



Enfield Climate Action Forum

Tackling the climate emergency

Response to LBE consultation

Draft Enfield Local Plan 2039

Main issues and preferred approaches

June 2021

<https://new.enfield.gov.uk/services/planning/draft-new-local-plan/>

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1. INTRODUCTION

This is a response from EnCaf 's Land Use Working Group. EnCaf, <https://www.encaf.org/>, is a local civil society forum of over 100 community organisations locally; an action group created to confront the emergency that climate change imposes on us all.

This is our formal response to Enfield's draft Local Plan 2039 under Section 18 regulations which we will follow up, if and when the Section 19 regulation proceeds, as formal consultees.

EnCaf's Land Use Working Group is concerned with the way in which our three most precious assets (air, water and land) are safeguarded, whilst used sustainably, for the benefit of Enfield's diverse communities and visitors.

The principles underpinning our views about land use were established in our response to Enfield's Blue Green Strategy [here](#) .

The seven parts of the Appendix declare our priorities though not in priority order as this varies from partner to partner within our organisation.

In the summary we provide links to a more detailed response about each of our seven priorities.

2. SUMMARY

Enfield Council's draft Local Plan 2039 will shape Enfield's urban and green landscape, its economy, jobs, homes and prosperity for generations to come.

<https://new.enfield.gov.uk/services/planning/draft-new-local-plan/>

The consultation paper is 400+ pages long and accompanied by 66+ pieces of documentary evidence, difficult both to scrutinise and summarise.

The summary leaflet [here](#) makes clear that underpinning the plan is a handful of key priorities: delivering 25,000 homes "for Enfield people", a commitment to 50% genuinely affordable homes, being "deeply green" and avoiding skyscrapers in inappropriate locations. Furthermore, residents are reassured that the Local Plan will protect Enfield from "uncontrolled development" all over the Green Belt.

We cannot deny these laudable aims. However our view, informed by a detailed evaluation of the evidence provided, is that the proposed plan will not realise its goals. At the heart of the plan are too many contradictions, uncertainties and questions.

How is building on the green belt, with the inevitable increase in motorised transport, "deeply green"? **GREEN BELT** [here](#)

What is "genuinely affordable"? **AFFORDABILITY** [here](#)

How is replacing viable agricultural land at Vicarage Farm, and a prosperous gardening centre at Crews Hill, with 6000+ homes helping Enfield adapt to the challenges of climate change ? **CLIMATE EMERGENCY** [here](#)

Crews Hill (3,500 homes) is currently a thriving regional hub for private and commercial gardeners providing jobs and contributing significantly to the local economy with potential to resume its traditional role as a local source of sustainable fresh food. <https://enfieldroadwatch.co.uk/>.

How can the proposals for 3000 homes on "Chase Park" (actually Vicarage Farm), ending centuries of protected access to the historic Enfield Chase and public rights of way such as Merryhills Way, preserve our heritage ? **HERITAGE** [here](#)

Vicarage Farm is currently owned by Comer Brothers who have already proposed a 5,000 housing estate.

<https://enfieldsociety.org.uk/explore-vicarage-farm/>

Developers already own, or have taken options on, all of this land. How much “control” can the council exercise in assuring that the homes built can be afforded by the families of 5,000 children in temporary accommodation?

The Council states that it’s “*a stark choice between packing people into small units in dense towers with a lack of access to open space and supporting infrastructure, or using a small amount of rural areas for high-quality affordable housing with access to gardens and extensive public space*”.

<https://enfielddispatch.co.uk/environmental-charity-slams-councils-misleading-green-belt-rationale/>

Our calculations, based on the council’s own data, reveal serious discrepancies between Enfield’s local plan and the London Plan 2021 and underestimations of brownfield site housing numbers.

BROWNFIELD [here](#)

Our view is that there are sufficient brownfield sites which can and should be used to deliver the family housing so desperately needed and that developing these sites will help improve access to green space across the borough . **MEETING THE HOUSING NEED** [here](#)

*We are convinced that building in Green Belt areas will **not** deliver **affordable** housing for Enfield’s families in need.* **HEALTH, WELLBEING AND EQUALITY** [here](#)

3. RESPONDING TO THE CONSULTATION

Enfield Council offers three ways of responding to the consultation:

1. Online using the bespoke consultation platform – which the council says is “*the quickest and easiest way to respond*” <https://letstalk.enfield.gov.uk/localplan>
2. Via email at: Localplan@enfield.gov.uk using the subject “Draft Local Plan” in the title. If you don’t mind, please cc encaflanduseworkinggroup@gmail.com. Thank you.
3. Via post to: Strategic Planning & Design, Enfield Council FREEPOST NW5036 EN1 3BR

Our advice is that the easiest way to respond is by email or letter as the online survey can feel restrictive – closed yes / no answers and on occasions only 255 characters with which to respond to important areas.

However, we have completed the online survey. Our responses can be found under section 5, “HAVE YOUR SAY” [here](#)

We hope that, should you prefer to use the bespoke online platform, you will find our responses to “HAVE YOUR SAY” helpful. You can skip sections should you wish, as we have done, and if you disagree with a proposition or a policy you have an option to explain.

4. APPENDICES

MEETING THE HOUSING NEED

The draft Local Plan is “designed to create homes for future generations⁴” but we asked ourselves to what extent the Local Plan meets the **current** housing needs, especially of the most disadvantaged families in Enfield who are without homes.

- 5,000 children in Enfield are in temporary accommodation.
- In the last three years, Enfield Council has built just 370 homes for local residents¹.
- Enfield has delivered an average 56% of the housing against the target over the last 3 years. As Enfield has failed to meet 75% of their housing targets it has been placed in the government’s category of “presumption in favour of sustainable development”²
- Temporary accommodation is unsuitable³ and costs Enfield Council millions of pounds each year.
- 4,500 residents are on the housing needs register⁴

The Borough [Profile](#) reveals

- As at October 2020, the number of empty dwellings was estimated at 3,103 (or 2.5% of dwelling stock).
- The supply of social housing in Enfield is very limited.
 - In the period April 2020 to March 2021, 458 social rented properties (a combination of Council and Housing Association homes) were let to households on the council’s housing register.
 - Of these, 392 lettings were to General Needs applicants (ie those without the need for sheltered or specially adapted homes).
 - Properties of three bedrooms (family homes) or more are in very short supply: only 79 such homes were let during this period.
 - By contrast, there are around 5,000 households on the council’s Housing Register.
 - From April 2019 to March 2020 Enfield’s Housing Options and Advice Team dealt with 2,008 applications for homelessness prevention or relief.
 - of which 1,965 households were assessed as owed a duty for assistance.
 - As at March 2020, 3,497 households were in temporary accommodation – the second highest number of all English authorities (behind Newham, with over 5,500).

By its own admission Enfield Council accepts there is an acute housing crisis⁴; these headlines reveal the reality.

Our conclusion is that the draft Local Plan does **not** meet the needs of the most disadvantaged families without homes. Neither does it recognise the needs of low income families whose housing

¹ Letter from Cllr Caliskan to Labour party members in Enfield

² <https://governance.enfield.gov.uk/mgAi.aspx?ID=50446>

³ <https://www.lgo.org.uk/information-centre/news/2020/sep/enfield-family-left-in-unsuitable-accommodation-for-three-years>

⁴ Leaflet circulated to Enfield Residents wk beg 18 August 2021

needs are not acute but who cannot afford the housing that's available. The local plan does not help this group at all and the plan must provide for London Living Rent homes.

Enfield Council's Draft Local Plan proposes 25,000 new homes over 20 years to 2039 - 18,500 homes delivered in Enfield's urban and brownfield locations and 6,500 in rural areas, including new places near Crews Hill train station. The council "commits to delivering 50% of new homes as genuinely affordable to rent or to buy – to meet Enfield's needs"⁴.

We conclude that whilst the broad aims of the plan are laudable, they are wishful thinking because they don't stack up against the evidence of delivery or the figures provided in the plan, and its accompanying evidence base.

Our view is that the Local Plan **does not** meet the existing need.

Furthermore we feel that the implication that the Local Plan will **increase the delivery of larger/family homes with gardens and of affordable housing in the Green Belt is cruelly misleading to low income families and those in temporary accommodation.**⁵

For example:

- There is no clarity about what "affordable" means.
 - If the Trent Park development on the Green Belt is indicative, affordable means shared ownership. Shared ownership requires a deposit of at least £6,000 and annual incomes of £56,000 - £90,000 + solicitors fees.
- The figure of 50% is fluid, to say the least.
 - The Whole Plan Viability Assessment says that "**up to 50%**" affordable housing could potentially be delivered on some greenfield sites, but also says that this estimate **will depend on individual site assessments** and, further, that **the assessment does not include the infrastructure costs** associated with building on Green Belt sites **and** that these costs could **impact the deliverability of housing on these sites**.
- Even if 25 000 new homes are built in the next 20 years, the total number of homes available at social, or truly affordable rent, by 2039 will not meet the needs of families now, or then.
 - Enfield's latest Local Housing Needs Assessment (LHNA) estimates that between 1,415 and 2,797 new Social Rent homes **per year** need to be built in Enfield to make up for previous shortfalls and to respond to the increasing demand for this type of housing⁶
- So, $20 \times 1415 = 28,300$ truly affordable homes would need to be built to meet the need, exceeding the total number (25,000) planned. That is unless the council meets its targets for social rent within the 5 year period of the LHNA. Such a likelihood needs to be weighed up in the light of performance so far.
- Chapter 8 is entitled "Homes for All" but there are no policies in Enfield's Local Plan that explicitly deal with homelessness; the homeless are barely mentioned.

⁵ Draft New Local Plan Consultation p190, p194 (3c) p196 (8.2.9) **and** delivery of family homes with gardens described as a "risk" on p12 in the public reports pack presented to council on 9 June.

⁶ 2020 Local Housing Needs Assessment <https://new.enfield.gov.uk/services/planning/enfield-strategic-housing-market-assessmentplanning.pdf> / <https://new.enfield.gov.uk/services/planning/evidence-base/>

AFFORDABILITY

In the words of the Leader of the Council in a leaflet to all residents distributed week beginning 17 August 2021 Enfield's draft Local Plan 2039 *"commits to delivering 50% of new homes as genuinely affordable to rent or buy"*.

That one sentence reveals the difficulty of responding meaningfully to the intentions behind the Local Plan insofar as "affordability" is concerned.

What, exactly, does that sentence commit to?

Half the homes built might be "genuinely affordable" to rent OR they might be "genuinely affordable" to buy.

If "genuinely affordable to buy" means shared ownership, it's not affordable. See "Shared ownership homes should not be classed as [affordable](#)"

And if "genuinely affordable" to rent does not mean at social rent, it's not affordable either. However, such is the complexity of housing policy that it is possible to have affordable intermediate rents (London Living Rent) so, at the very least, far more clarity is needed in public documentation.

Or will half the homes built be a combination of the two, leaving the developers to choose the housing mix on the basis of what they consider viable⁷ i.e. profitable: *"When determining the amount of affordable housing acceptable on the site, regard will be given to the economics and financial viability of the development including any particular costs associated with it"*.

And what is "genuinely affordable" ?

And, in any case, the remaining 50% will be at market rents or market purchase, neither of which is affordable when the average home in Enfield costs 14 times the median household income⁴.

Homes in the Green Belt fetch far, far more than this and are out of most people's reach. We are left reflecting on what *"50% affordable housing in all areas of the Green Belt, including the proposed rural place making areas at Crews Hill and Chase Park"* means in reality.

The 8.2 Strategic Policy SP H2: Affordable housing p 194 is non-committal:

- "The Council will **seek to maximise** the delivery of affordable housing in the Borough **and aim to secure** 50% of all new homes across the plan period as **genuinely affordable**."
- Proposals that involve the loss or demolition of existing affordable housing floorspace (including estate regeneration schemes) **will be expected to deliver at least** an equivalent amount of affordable housing floor space and, **where possible**, achieve an uplift in provision.
- Estate regeneration schemes **will be expected** to reflect the existing mix of affordable and family housing.

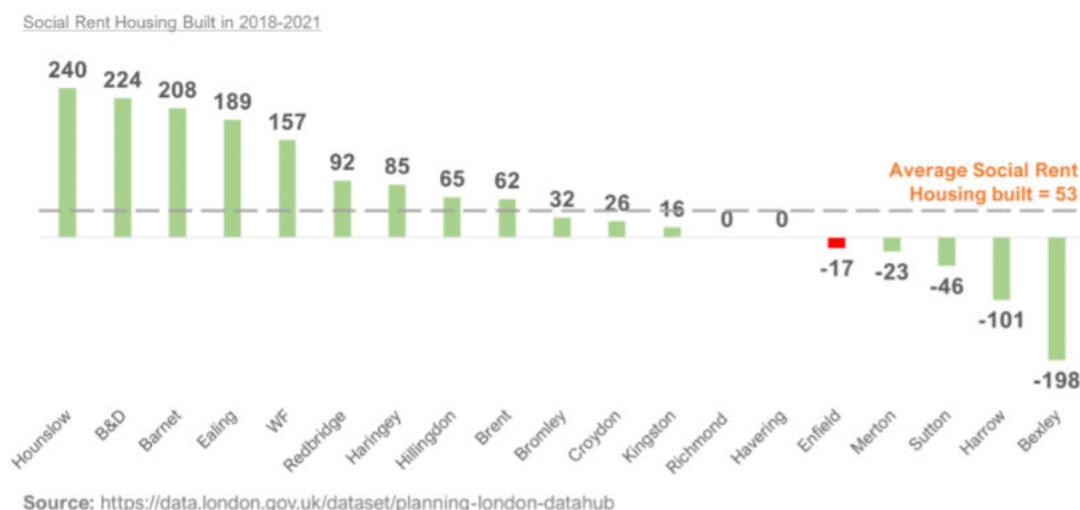
8.4 Policy DM H4 proposes that "small sites and small housing development **seek to achieve** the London Plan target of 353 new homes per year on sites of less than 0.25 hectares", a not insignificant number. And yet there are no specific targets for affordability in developments of 10+ homes and should be

The commitments to affordability are vague.

⁷ P197 Local Plan 2039 consultation document

Below we examine precedent and conclude that the commitments to affordability are not borne out in practice either.

- The number of affordable Social Rent homes built in Enfield has been lower than the number lost (e.g. demolished).⁸
- The building of Social Rent homes in Enfield has not kept up with demand and Enfield is now approximately 1,600 homes short of its 2011-2020 housing target for Social Rent homes⁹.
- And yet the delivery of Social Rent housing in Enfield has declined recently. As this chart shows, since 2018 more Social Rent housing was demolished/lost in Enfield than built¹⁰.



- See “Less than Zero” - The Decline of [Social Rent Housing](#) in Enfield

GREEN BELT

The relevant references here are PL9 (Crews Hill), PL10 (Chase Park aka Vicarage Farm) and PL8 (Rural Enfield).

PL9 and PL10 propose unprecedented and radical changes to the Green Belt in Enfield, with plans to create two massive housing developments of between 6,000 and 8,000 dwellings, depending on the figures provided by the council or the developers (Comer Brothers).

The proposals are underpinned by Enfield’s 2021 Green Belt and Metropolitan Open Land Study (2021 GB/MOL) by LUC consultants which seeks to justify de-designation of substantial areas of the Green Belt in Enfield, following a Green Belt Boundary Review in 2013 which makes no such recommendation.

In this study the authors indicate that their judgements “*inform only part of a necessary ‘exceptional circumstances’ case for making alterations to Green Belt and / or MOL boundaries*”. The analysis consists of assessing the “*greatest contribution to the greatest number of Green Belt purposes*” set out in the National Planning Policy Framework (NPPF) though acknowledging that

⁸ Sources: MHCLG Housing Delivery Test 2020, GLA Planning London Datahub

⁹ Shortfall is the difference between the GLA reported figures for Social Rent Housing and the targets for Social Rent housebuilding set by Enfield in its Core Strategy 2010-2025.

¹⁰ Evidence of need can be seen on 2015 SHMA and 2020 Local Housing Needs Assessment
<https://new.enfield.gov.uk/services/planning/enfield-strategic-housing-market-assessmentplanning.pdf> /
<https://new.enfield.gov.uk/services/planning/evidence-base/>

“Green Belt land only needs to contribute to one of the Green Belt purposes to be of value in Green Belt terms”.

Thus the case for “exceptional circumstances” is not fully made in this lengthy and comprehensive judgment. Since the rationale for de-designation is not made explicitly anywhere else, the policy contradictions, uncertainties and unanswered questions in the proposed Local Plan are sufficient to undermine any justification for de-designation.

“Chase Park” is Vicarage Farm, a large area of open countryside, traversed by Merryhills Way, designated a public right of way by Enfield Council in 2011 and which, under the proposals, would be surrounded on both sides by housing. The Enfield Society illustrates this [here](#). There can be no justification for this under the NPPF, and no exceptional circumstance. Indeed the proposal is explicitly undermined by these policies in the Local Plan consultation document. Further, the health imperative identified in policies Sc1 and Sc2 strongly argue in favour of walking in green spaces for health and wellbeing.

In fact there is already a deficit of green space in the wards adjacent to Chase Park i.e. Town and Highlands wards. A green space deficit is anything under 2.15ha open land per 1,000 residents – the current ratio in Town is 0.33 and in Highlands 0.90 (see Blue and Green Strategy Audit), as such residents rely on this area for open space, relaxation, green prescribing etc.

The council asserts that the acute housing problems of the borough can only be solved by building on the Green Belt. We refute this (see above).

Strategic Policy SP BG2: Protecting nature conservation sites
Strategic Policy SP BG3: Biodiversity net gain, rewilding and offsetting
Strategic Policy SP BG4: Green Belt and Metropolitan Open Land
Strategic Policy SP BG5: Green Belt and edges of the countryside/urban areas
Policy DM BG6: Protecting open space

Amongst the “lowest contributing Green Belt within the borough” according to the 2021 GB/MOL study, is the “inappropriate

developments associated with the commercial and industrial estates adjacent to the insert urban area of Crews Hill”.

Notwithstanding the well documented failure of enforcement by the local authority in this area, the proposed local plan fails to recognise the contribution of Crews Hill to the local economy, leisure and tourism, health and wellbeing and the climate emergency in relevant local plan policies. An historic

9. Economy

Strategic Policy SP E1: Employment and growth
Strategic Policy SP E1: Employment and growth – options
Strategic Policy SP E2: Promoting jobs and inclusive business growth
Strategic Policy SP E3: Employment locations and managing change
Strategic Policy SP E4: Supporting offices
Strategic Policy SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites
Policy DM E6: Redevelopment of non-designated sites
Policy DM E7: Providing for workspaces
Policy DM E8: Local jobs, skills and local procurement

centre for market gardening, providing food for Londoners post war, the potential for Crews Hill to be a hub for a sustainable local food supply, “green” jobs (with links to local Capel Manor College for training and apprenticeships)

and tourism is immeasurable.

And yet not even the most superficial cost benefit or SWOT analysis has been performed on the potential for this area, as part of SIL for instance to alleviate the pressures on SIL elsewhere with the potential to release land for homes in the heart of communities, not distant from public transport, community amenity and social networks.

The topic papers on PL9 Crews Hill and PL10 Chase Park (Vicarage Farm) provide assessments of PTAL and estimates of travelling time to transport hubs that are wholly unrealistic in terms of a demographic (65+) that is growing faster than any other, the fact that 25% of the working-age population have a disability and the families with young children for whom the housing estates are

allegedly being built. PL9 Crews Hill and PL10 Chase Park (Vicarage Farm) will increase domestic car ownership and journeys as the homes will be too distant from railway stations which is neither promoting sustainable transport nor active transport. Quite the contrary. And will, further, make the homes inaccessible in terms of transport as well as price for those families which desperately need them.

The claims of these papers are also undermined by the findings of transport assessments in the evidence base

Policy BG9 refers to “Allotments and Community Food Production” but restricts itself to “roof gardens, allotments and community orchards”. Enfield is described in this policy as “a leading centre in the development of sustainable food production and horticulture” something of an exaggeration which could become true but only if the ill-conceived policy (PL9) is abandoned and PL8 (Rural Enfield) is re-conceived.

A policy on Rural Enfield is welcome. This is the wrong one and wholly ill conceived.

Crews Hill is a vibrant local and regional hub for horticulture, equestrianism and, in recent years, retail. Whilst other town centres in Enfield are receiving attention because they are declining (TC1 and TC2), Crews Hill is flourishing with visitors from many miles away as evidenced by Enfield Roadwatch’s [survey](#)

CL2 Leisure and Tourism recognises the importance of visitors to the rural economy but fails to recognise Crews Hill, or indeed Enfield’s agricultural heritage as contributory. Indeed, RE4 (Farm diversification and rural employment) indicates a policy direction **away** from agriculture which is, in the light of potential food insecurity due to climate emergency, retrograde.

DMCL2 explains that the Council “*considers that the leisure and visitor experience in the borough has the potential to contribute significantly to Enfield’s economic growth. It can contribute to enhancing quality of life through delivering experiences for visitors and a greater variety of jobs and training opportunities. Importantly, it can help support regeneration, and diversify and develop the rural economy*”.

The Integrated Impact Assessment (IAA) Chapter 12 identifies as an issue “the need to protect valued landscapes, including designed landscapes and extensive semirural landscape character areas in the north of the borough, and avoid loss of Green Belt that contributes to the established Green Belt purposes”

PL9 and PL10 are totally antithetical to this ambition.

BROWNFIELD

Our calculations, based on the council’s own data, reveal serious discrepancies between Enfield’s draft Local Plan and the London Plan and underestimations of brownfield site housing numbers.

Our view is that there are sufficient brownfield sites which can and should be used to deliver the family housing so desperately needed. **MEETING THE HOUSING NEED** [here](#)

Just four examples suffice to illustrate this.

1. SA2 Palace Gardens: Between 600 and 1,200 homes will be built in Enfield Town at Palace Gardens / Palace Exchange, yet only 350 are included in the Draft Local Plan
2. PL5 Meridian Water: 5000 in the Draft Local Plan, elsewhere 10 000

3. SA49 Brimsdown, Land to the south of Millmarsh Lane, Brimsdown Industrial Estate: 0 in Local Plan, but *Areli Developments “is providing strategic planning and development advice toward the creation of a whole new town for London on 65 acres of riverside land” for 7500 homes in Brimsdown London.* [Brimsdown](#)
4. SA15 Joyce Avenue & Snells Park Estate N18 2SY 1217 homes in Local Plan. The homes are already in the pipeline but designated in a 10 year window. The [Council Minutes](#) acknowledge that the scheme would be expensive but it would create **over 2000 new affordable homes.**

More detailed data can be found [here](#) under these headings

1. [Homes built on small sites: Serious discrepancies between the London Plan and Enfield Council’s draft Local Plan](#)
2. [Enfield Council’s draft Local Plan undercounts the number of homes that could be built on brownfield sites](#)
3. [Homes built in Green Belt areas: Building in Green Belt areas will not deliver the affordable housing Enfield Council claims](#)
4. Homes for families: Brownfield sites can and should be used to deliver more family housing (awaiting publication)

These papers explain why 25,000 homes can be built on areas outside the Green Belt, and the benefits of taking this approach.

HERITAGE

Enfield Town is an ancient market town. Its market was established by Royal Charter from King Edward 1st in 1303.

The many historic buildings built in the 7 centuries since make Enfield Town a rich conservation area.

Enfield Chase was a royal hunting ground established by the Plantagenet kings in the middle ages. Critically, it was closely connected with Enfield Old Park, which is even older and appears in the Domesday book. Deer were raised in the Old Park and released into the Chase for hunting. Currently 1,500 hectares of undeveloped former Chase land, currently designated Green Belt, lies east of the Hertford Loop railway line.

This land is designated as an Area of Special Character and also as Enfield Chase and Camlet Moat Archaeological Priority Area.

Dr John Langton, Emeritus Professor St John’s College, Oxford writes [that](#) “*Enfield is the only surviving example of a chase, within which rights to game and over vegetation varied slightly from those in forests. Thus, Enfield possesses an extremely rare and very valuable landscape asset*”.

A failure of due diligence in determining the scope of Chase Restoration [Project](#) has already destroyed an important historic, education and cultural link between Rectory Farm, a publically accessible commercial wheat farm adjacent to the London Loop, and [Wrights](#) Flour Mill in Ponders End. There has been a mill at Ponders End for 900 years and the present mill, owned by members of the Wright family since 1867, is Enfield’s oldest working industrial building.

Rectory Farm is now grassland awaiting tree planting; the immediacy of local food production, and views of rolling wheatfields enjoyed by thousands of visitors, especially during lockdown, ruined.

At best these policies put Enfield’s ancient heritage at risk:

- CL9 Crews Hill

- CL10 Chase Park
- PL1 Enfield Town

The [Integrated Impact Assessment](#) (IAA) scoping report proposes a heritage related objective to:

- Sustain and enhance the significance of heritage assets, support the integrity, special interest, character, appearance and historic setting of historic settlements and heritage assets, both designated and non-designated;
- facilitate enhancements to the fabric and setting of the historic environment;
- support access to, interpretation and understanding of the historic environment (including through investigations and studies which better reveal the significance of archaeological assets).

CL9 Crews Hill, CL10 Chase Park and PL1 Enfield Town do not do this.

CLIMATE EMERGENCY

EnCaf is dedicated to “tackling the climate emergency”. Reassuringly, the Local Plan has a section dedicated to this purpose, SE1: Responding to the climate emergency, with a raft of wholly appropriate ancillary policies, thus:

4. Sustainable Enfield

Strategic Policy SP SE1: Responding to the climate emergency
 Policy DM SE2: Sustainable design and construction
 Policy DM SE3: Whole-life carbon and circular economy
 Policy DM SE4: Reducing energy demand
 Policy DM SE5: Greenhouse gas emissions and low carbon energy supply
 Policy DM SE6: Renewable energy development
 Policy DM SE7: Climate change adaptation and managing heat risk
 Policy DM SE8: Managing flood risk
 Policy DM SE9: Protection and improvement of watercourses
 Policy DM SE10: Sustainable drainage systems

And

13. Movement and connectivity

Strategic Policy SP T1: Promoting sustainable transport
 Policy DM T2: Making active travel the natural choice

There are some good policies here, for example:

- The ban on new gas connections
- The endorsement of the circular economy approach to building design and construction
- Prioritising reuse and retrofit of existing buildings
- Monitoring energy use for five years
- The endorsement of passivhaus.

All this is good – though the timescale is often far too long. As an example – but a critical one – we see no reason why the passivhaus standard should not apply from 2023.

But are they policies that the council means to follow? That seems doubtful:

- Policy SE3 says the priority is to “*reuse and retrofit existing buildings wherever possible before considering the design of new buildings*”. But there’s little about planning for reuse. Instead we have plans to build 6,000 houses on the Green Belt and tower blocks in Enfield Town!
- Policy T2 is to *Make active travel the natural choice* yet we see almost no proposals for new active travel infrastructure or services. For instance, there’s only one proposal (on page 45) for a new cycle lane. Quieter neighbourhoods are also mentioned once, but as part of the

(many) conditions to be met by developers. No suggestion that the council has an overall plan or will take any initiative.

- Policy SE7 says that “Developments will be required to minimise overheating ... and optimise the layout ... and design of buildings ... to minimise any adverse impacts on internal and external temperature”. Tower blocks of the sort approved or planned for Enfield cannot satisfy this policy. Air conditioning will be required and this, like lifts, increases the energy requirements. This is not a route to sustainability.

And some are not good at all. Thus Policy SE5: “Temporary fossil-fuel primary heat sources must only be installed for a maximum of five years prior to connection to an approved low carbon heat source”. The problem here is that temporary exceptions tend to become permanent. Consider the gas-fired plant (up to 60MW gas boilers and up to 1,800kWe gas-fired combined heat and power plant) that will provide Energetik with heat until the new incinerator comes on line and as a standby for when it’s out of action that was given [planning permission](#) in July 2020. Will that really be turned off once the incinerator is working?

And then there’s the question of what isn’t there. For instance:

1. Most of the buildings that will be in use by 2050 – the government’s zero carbon target date – are both already in use and horribly inadequate. Yet there’s no mention of the huge retrofit programme that is urgently needed and thus no dates nor energy-efficiency targets.
2. Electric vehicle charging points are mentioned twice, and the commitment is heartening. But specific targets and a plan are necessary for the proposals to have credibility. Neither is present.
3. No plans for the Council to improve travel infrastructure or services.

The policies are admirably ambitious, but owe more to the easy rhetoric of word processing than to emergencies averted. With the inspiring exception of SE10 Sustainable Drainage Systems, SE8 and SE9, the reality, as evidenced by other policies in the Local Plan and the [response to the declaration of climate emergency](#) in 2019, is different.

The Local Plan does indeed “play an important role in helping the Borough respond to the climate emergency” and it’s encouraging to read in SE3 the priority to “*reuse and retrofit existing buildings wherever possible before considering the design of new buildings*”.

How does this admirable intention stack up against, for instance, PL9 Crews Hill and PL10 Chase Park and 6500+ homes in a brand new development on the Green Belt with no proposals for a supporting public transport infrastructure ?

And what of the implication of “new built form” in Enfield Town PL1 which, on the basis of the initial proposals, will require demolition of existing buildings to make way for tower blocks?

We feel there should be much more emphasis on [expanding and upgrading existing buildings](#)

And the further implication of the replacement, with a much larger construction, of the [waste incinerator](#) in Upper Edmonton, of which there is no mention in PL4 Angel Edmonton?

This incinerator is the very opposite of renewable energy (SE6) and the antithesis of a circular economy SE3 because of the embodied carbon associated with demolition and reconstruction. As stated in SE3 “*up to a fifth of carbon emissions associated with UK building stock comes from embodied emissions associated with new builds*”.

And then there are the carbon dioxide emissions which are not listed by London Energy as [emissions](#), though carbon dioxide emitted broadly matches that of oil, gas and coal fired power

stations. The policy to replace the incinerator blatantly ignores SE5 Greenhouse Gas emissions and low carbon energy supplies which says *“Any new energy networks should prioritise non-combustible, non- fossil fuel energy as the primary heat source. Temporary fossil-fuel primary heat sources must only be installed for a maximum of five years prior to connection to an approved low carbon heat source and interim emissions should be reflected in energy statements and subsequent calculations and offset payments”*.

The Local Plan, by virtue of 68 mentions and policy DE6 Tall Buildings, commits to “tall buildings”. Nowhere in the local plan is there an analysis of tall building design for adaptation to climate emergency, or reflections on concerns such as:

- lifts use electricity
- how shade is provided in tower blocks
- how 100 degree heat is mitigated in tower blocks
- air conditioning: which consumes electricity, emits heat and employs [refrigerants](#) that are greenhouse gases (GHG) more potent than carbon dioxide.

The highest building in Enfield, approved by the planning committee in September 2020, will be 29 storeys high, almost three times any existing buildings. The Local Plan envisages these heights:

Height (storeys)	Height (metres)	“appropriate locations”
26	78	Meridian Water
23	69	Edmonton Green
17	51	Enfield Town Station
16	48	Southbury Station, Silver Street, Brimsdown
15	45	Cockfosters station
13	39	Palace Gardens, Enfield, Southgate Circus
13	39	Enfield Civic Centre
11	33	Enfield Chase station, Palmers Green, Oakwood station
9	27	Arnos Grove

Electric vehicle charging points are mentioned twice, and the commitment is heartening, though specific targets are necessary for the proposals to have credibility. Numbers and energy-efficiency targets for a big retrofit programme are equally essential. Commitments even to setting more tangible, quantitative proposals would be more convincing.

And for residents keen to pursue their own electric vehicles, the lack of information about providing EV charging to existing properties with one street parking is discouraging.

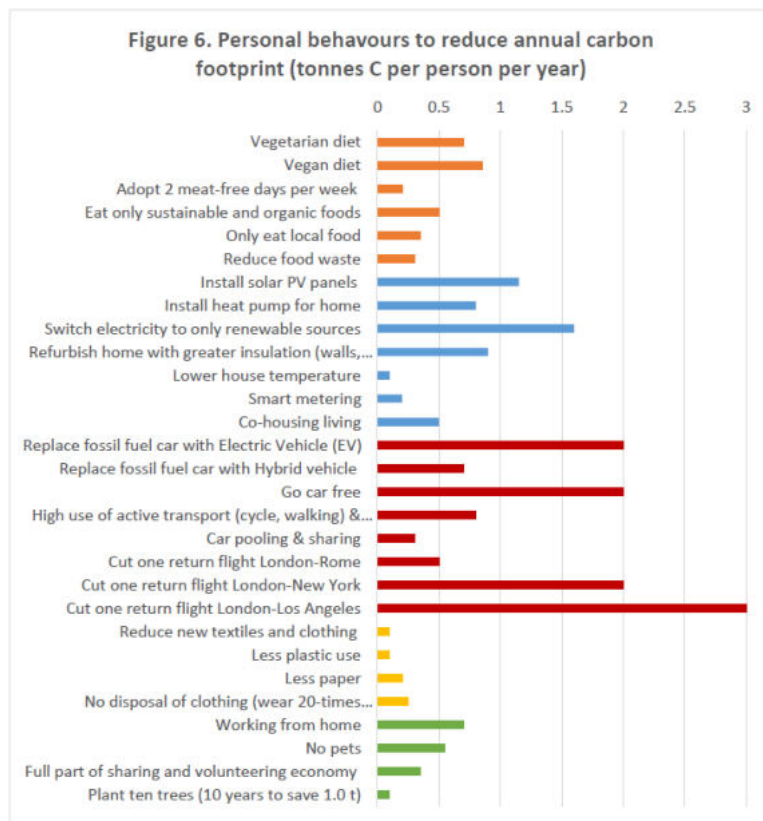
In Enfield’s Climate Emergency Action Plan the council makes a commitment to **“Influence residents to adopt zero carbon lifestyles and take low carbon decisions.”** Alongside the recognition of the important part that the Local Plan plays in helping the Borough respond to the climate emergency, it’s disappointing to read how limited the Council’s ambition to influence residents is.

Prof Jules Pretty¹¹ recently published a paper called [“The Good Life and Low Carbon Living”](#) which included this guide to personal behaviours to reduce annual carbon footprint, under the headings

¹¹ Professor of Environment and Society, University of Essex, February 2021

food, home, mobility, stuff, leisure (colour coded in the chart below). It's a useful guide to what will make a difference and should inform policy priorities.

The advice is this: don't try to do too much at once. Pick one choice, and implement; and then pick another. Enfield could do worse than follow the campaign of the Norfolk Association of Local Authorities, who urge "cut a tonne in '21." And provide the infrastructure to do it.



We need more confidence in the commitment to the principled policies on sustainability contained in the Local Plan.

HEALTH, WELLBEING AND EQUALITY

The relevant policy proposals are

5. **Addressing equality and improving health and wellbeing**
Strategic Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities
Strategic Policy SP SC2: Protecting and enhancing social and community infrastructure

Enfield's Borough Profile (p4 and p27) reveals the challenges to health facing Enfield in more depth than 2.1.8 in the Spatial Portrait (Chap 2).

Healthy streets and encouragement of active travel are important policy platforms but outwith robust policies to discourage motorised transport in the most polluted areas, encourage car sharing and hiring (Zipcar for instance) and improve public transport infrastructure, the proposals remain unconvincing. The council does not do enough to engage communities or use its influence; the introduction of Low Traffic Neighbourhoods being a good example of a wholly supportable policy which has proven highly controversial and divisive because of the means by which it was implemented.

Further, the health economy in Enfield is very fragile indeed. Provision of and access to primary health are both severely constrained; not the fault of GPs and primary healthcare providers, or Enfield Council, but of a decade of underinvestment and reliance on overseas trained professionals.

Our question is, does this Local Plan add to or diminish these pressures?

In respect of air quality, provision of green space and policies to address the fastest growing demographic i.e. Over 65s (likely to be most impacted by both air pollution and heat), Enfield's Local Plan will only add to the pressure on primary health.

The [Air Quality Appraisal](#) draws important conclusions. It says "Monitoring undertaken by the Council suggests that pollutant concentrations within the borough should now meet the objectives in most locations, **although the monitoring coverage is limited.**

It most definitely is, and EnCaf's Air Pollution Working Group has begun a project with [Global Action Plan](#) to deploy diffusion tubes to monitor pollution in pollution intensive areas such as the A406 (North Circular) and Bullsmoor Lane because of their concerns regarding air pollution in some areas.

The Air Quality Appraisal goes on "Modelling undertaken by the Greater London Authority for 2016 right across London highlights likely pollution hotspots within the borough. Particularly notable are areas alongside the M25, the A406 North Circular, the A10 Great Cambridge Road and the A1055 Bullsmoor Lane. These hotspots have been identified by the Greater London Authority as Air Quality Focus Areas".

The A406 North Circular is the site of the proposed enlarged waste incinerator in Upper Edmonton. Increasingly questions are being asked about microparticle emissions and their [impact on health](#) including guidance from DEFRA to [Directors of Public Health](#) which states "There is no safe level for particulate matter (PM10, PM2.5), while NO2 is associated with adverse health effects at concentrations at and below the legal limits". The Local Plan fails to mention this, or the increased vehicular movements associated with the intention to import waste from beyond the boundaries of the North London Waste Authority.

The conclusion of the Air Quality Appraisal is also concern:

It was found that an estimated 14,806 residential units across 18 site allocations would potentially be exposed to relatively poor air quality; about 60% of proposed units. 38 sites near Air Quality Focus Areas are, potentially, at risk of a “significant negative effect” from air quality. It goes on, “Site allocations with potentially poor air quality would require measures to protect new residential population from poor air quality.”

It isn't clear what these measures might be but we would expect, under the circumstances, the Local Plan to at least address the potential impact of the proposed incinerator on health. It doesn't.

Heatwaves, or heat and hot weather that can last for several days, can have a significant impact on society, including a rise in heat-related deaths. [“Heatwaves are among the most dangerous of natural hazards.”](#)

The lack of woodland and appropriate green space for shade in the East of the borough is a major health concern given the changes in climate and the mid-summer temperatures that we're already experiencing. The urban heat island (UHI) effect is considerable in those areas and areas of green space and woodland of sufficient size are known to alleviate the issue and lower temperatures.

The [Integrated Impact Assessment](#) Appendix A 4.26 explains the UHI and illustrates how Enfield is affected by summer heating in comparison to the rest of London. It concludes that the east of the borough is more adversely affected by heat and, that since poorer Londoners will be more adversely affected by UHI, and that heat is more of an issue in the east of the borough, LBE will “need to carefully consider the spatial distribution of development, its impacts on heat and the social and economic east/west divide in the borough” .

It's well established that UHI is exacerbated by dark surfaces and that increasing the proportion of white surfaces (eg on roofs) can alleviate the heating effect. The draft Local Plan does not address these sorts of solutions that are being adopted elsewhere, for instance regarding the impact of tarmac in large quantities or the increase in the UHI arising from two massive housing developments in Chase Park PL9 and Crews Hill PL10. These areas currently have relatively low land surface temperatures and should remain that way.

Reporting that the Met Office is predicting hotter and drier summers with London being located in the driest region of the UK, the IAA considers that drought is as significant a concern as flooding. Whilst the policy response to flooding in the draft Local Plan is admirable, drought isn't mentioned at all.

The environmental impacts of drought may include low flows in rivers and impacts on wetlands. This can also cause a reduction in water quality and damage to aquatic ecosystems. Further with a rising population the water resource gap could be over 100m litres per day by 2040.

The IAA objective in respect of climate change is

- to ensure resilience to climate change particularly mindful of the likelihood of climate change leading to **problematic high temperatures**, worsened flood risk and **increased risk of drought**.

The draft Local Plan does not do this.

The [unpublished report into Meridian Water Environment Strategy](#) by the majority of Enfield's Environment Overview and Scrutiny Panel raised “serious questions” about the environmental impact of the proposed Meridian Water development.

Reports from Better Homes for Enfield reveal, on the basis of data provided by Enfield, that [“Meridian Water will deliver a lower proportion of open green space than Hong Kong”](#) and in “Meridian Water – Greenspace, Health, and Inequality” that the redevelopment will have a detrimental impact on the existing local community’s [greenspace provision](#).

The Local Plan could address this by planning for green space and woodlands where they are most needed to address health and social inequalities ~ in the east of the borough in the form of “tiny forests” e.g. in existing parks and playing fields (e.g. Durrants, Jubilee, Albany, Bullsmoor Lane, Bellmore playing fields, school playing fields, in the two new small parks (Edmonton Marshes and Brooks) or as a continuous swathe across Lee Valley to Epping Forest. CPRE proposes Banbury Reservoir Park as one of [Ten New Major Parks for Enfield](#), adjacent to Meridian Water.

Over 65s are the fastest growing demographic in Enfield, which already has a disproportionate number of care and nursing homes relative to the size of the population. Primary Care funding for Enfield, based on a demographic profile decades out of date, is insufficient to this need.

[The Integrated Impact Assessment](#) (LUC consultants) Appendix scopes the challenges and notes that “there are significant pressures on health infrastructure” namely:

- Too few GP practices on estates;
 - An ageing GP service with inadequate facilities, 50% of practices are in old residential properties;
 - There is a struggle to match adult social care availability with hospital out patients, resulting in delayed discharge;
 - Uneven distribution of private and public care homes between the west and the east of the borough respectively;
- and
- Cross boundary movement of patients is putting increased pressure on facilities, in particular Chase Farm Hospital

The intention of the Council to support the provision of appropriate housing to meet the specialist and supported needs of vulnerable people in Enfield, including specialist housing for elderly people is welcome (H5 Supported and Specialist Housing).

H5 further states that by 2039:

- there will be an increasing need for specialist housing for older, disabled or vulnerable people in Enfield;
- the number of older person households aged 75 and over, who are most likely to move into specialist older persons housing, will increase by 56 per cent over the plan period;
- the overall need for residential care (C2 use class) between 2020 and 2036 is projected to increase by 755 units and specialist older person by 1,242 units.

(Though the London Plan sets an annual benchmark of 195 specialist older persons housing, but this is up to 2029).

Additional care homes (~ 300 beds) are already in the planning pipeline and more are envisaged in the Local Plan:

- PL10 Chase Park SA29 Arnold House (60+ homes)
- SA41 Albany Leisure Centre (30+ homes)
- Chase Park Topic Paper HIC6 and HIC 10 are promoted as sites for extra care or older age housing.

It is hard to see how the crumbling primary health infrastructure will be able to cope with the demands of poor air quality, excessive heat and an ageing population; but health, wellbeing and equality in Enfield will undoubtedly suffer.

CREWS HILL SURVEY

Signatories to a letter about the Local Plan collected over 2 day period at Crews Hill, outside Thompsons of Crews Hill. The survey shows the number of visitors to Crews Hill from outside Enfield and that residents from all parts of Enfield visit Crews Hill.

Summary

TALLY FOR FIRST DAY		TALLY FOR SECOND DAY	
Enfield postcodes	39	Enfield postcodes	78
EN non-Enfield	31	EN non-Enfield	40
IG	2	IG	4
Misc	2	Misc	7
HA	6	HA	4
NW	5	NW	3
RM	3	RM	2
WD	3	WD	6
LU	2	LU	0
AL	5	AL	10
HP	3	HP	0
E	9	E	9
N non-Enfield	18	N non-Enfield	22
SG	5	SG	7
CM	9	CM	6
CO	0	CO	2
TOTAL	142	TOTAL	200 [weekend total 342]

CREWS HILL - 28-29/8/21	
EN postcodes outside Enfield	
EN5 4PP	X
EN5 4PP	X
EN4 8QZ	x
EN6 4EJ	It would be a shame for gardening centres to disappear for greedy developers
EN6 4JR	I've been coming to Crews Hill for 50 years for the plants and lovely nurseries to have coffee, etc. with my husband at weekends. [Cuffley]
EN9 3AU	Been coming here for years and love the garden centres [Waltham Abbey]
EN4 8PA	New to the area – however shops made a huge impact on my garden, etc. Would love to continue to shop in this area.
EN4 8PA	Need to keep places like this in business!
EN8 0AS	X [Cheshunt]
EN10 6PE	X [Broxbourne]
EN9 3DE	X [Waltham Abbey]
EN10 6HH	X [Broxbourne]
EN10 6EA	X [Broxbourne]
EN10 6LF	X [Broxbourne]
EN7 5SL	X [Goffs Oak]

EN10 6FX	Best place for garden centres and pet stores locally and flowers [Broxbourne]
EN10 6FX	X [Broxbourne]
EN11 9FS	I visit Crews Hill regularly and would not want to lose this important area for shopping [Hoddesdon]
EN11 9FS	I visit Crews Hill regularly, and would not like to see businesses have to shut and people lose this lovely space. [Hoddesdon]
EN7	Great to shop. Good cafes. Great for the kids. [Cheshunt]
EN7 5JJ	Great place to visit. Come weekly. [Goffs Oak]
EN7 6NZ	x
EN8 9QY	X [Cheshunt]
EN8 9QY	X [Cheshunt]
EN6 2JH	We use Crews Hill businesses all the time. We would hate to lose all the lovely shops. [Potters Bar]
EN6 2JH	x
EN4 9AJ	I love coming to Crews Hill. I have been coming since I was little.
EN11 6AR	I work in the garden centre in Crews Hill [Cheshunt]
EN8 8BS	x
EN5 2BL	x
EN5	X [Potters Bar]
EN5	X [Potters Bar]
EN5	X [Potters Bar]
EN9 1LN	X
EN7 6JP	X
Hemel Hempstead	X
EN11 8PY	X [Hoddesdon]
EN8 0LN	X
EN7 6WA	X [Cheshunt]
EN9 1LN	X
Elstree	Been coming here for years from Elstree – unique area!
EN9 3EW	X
EN8 7QT	x
EN8 0DE	X
EN6 2DH	Keep the Green Belt – once gone it will be lost forever!
EN6 2DH	x
EN6 5DE	X
EN6 5EG	It's a lovely area and such a nice and welcoming place and so many shops and places
EN7 5QD	Independent shops are great and one of a kind area around here
EN8 9JX	X
EN9 3BW	X
EN6 6JL	X
EN6 6JL	X
EN10 6JL	X
EN8 0UN	X
EN8 0UN	X
EN6 4NP	Only garden centre in area
EN8 9HS	Only garden centre in area
EN10 6LF	Love coming garden centre and lunch
EN8 9QG	Been visiting for many years!

EN6 hHX	X
EN5 5QX	X
EN9	X
EN6 5HW	X
EN4 8HY	X
EN5 5DA	X
EN6 4DL	X
Cuffley	Only place I came out to during lockdown
EN10 6PG	Been coming here for over 50 years. Disgraceful to think it will be taken away
EN4 0QS	X
EN6 1NN	The area forms a vital part of the local economy
[71]	
ENFIELD postcodes	
N9 9PY	These garden centres are used by people from all over London and Herfordshire
N9 9PY	Garden centres are very useful
EN2 6NF	Great to bring grandson to and get all our garden supplies
EN2 8DP	I like the plants [9 years old]
EN2 8DP	I like plants
EN2 8DP	I am 17 years old and I love the plants
N14 4EY	We have been coming here forever and cannot imagine Enfield without it. People come from everywhere to visit.
EN2 8DP	This is the place where we have been coming as a family to get the things we need for our garden.
EN1 4AA	x
EN1 4AA	x
EN1 3UQ	x
N14 6QW	x
N21 3AJ	x
EN3 5HR	x
EN3 6SN	x
EN1 3SE	x
EN1 3NB	Only garden centre – fantastic shops
EN1 4PS	Garden centres and open spaces.
EN1 4PS	Only garden centres for miles – lots of surrounding green space – once it's gone for development it won't be available to rewild.
N13 5AR	Nice area surrounded by land and spaces. Excellent oasis to visit with family. No developments thank you.
EN1 3TZ	Crews Hill is a great place for all our garden needs.
EN1 3QY	x
EN3 4AZ	x
EN3 4AZ	x
N14 6QS	A wonderful place for all our needs
N21 2AP	We would be lost without it.
EN1 4QZ	x
EN2 0LR	x

EN2 8LB	x
EN3 6BN	x
EN3 6BN	x
EN3 6BN	x
EN2 0LS	x
EN2 0LS	x
EN2 9BL	x
EN2 0HH	x
EN2 8ED	Please save the green belt. It is vital for peoples well being, and JOBS
EN2 8ED	x
N14 7HD	x
EN1 3DS	x
N13 5NR	x
N13 5NR	x
N9 7PU	x
EN2	x
EN1	x
N9 9TP	x
EN2 9JE	The whole development plan is contrary to [1] the Mayor or London's directive and [2] your own plan to keep the Green Belt and to make it more accessible to all. By removing it and developing on it you make it accessible to no one!!
EN2 0JY	The green belt plans disgust me. We live in this area as its so green. SHAME ON YOU!!!
EN2 9UE	X
EN2 0DX	X
EN2	X
N13 5QQ	X
N13 5AJ	X
N13 5AJ	X
N18 2NB	X
N13 5AJ	X
EN2	X
EN3 7LE	X
EN3 7LD	X
EN2 7PA	Greenbelt is for the residents of Enfield and beyond to enjoy. Save it.
EN2 7HD	KEEP ENFIELD GREEN. THE GREEN SPACES HAVE BEEN ESSENTIAL FOR MY MENTAL HEALTH DURING LOCKDOWN.
EN2 7HD	X
EN2 9BZ	X
EN2 9BZ	X
N21 2SE	X
N9 0NB	X
EN2 0ED	I am against the redevelopment of Crews Hill and losing the garden centres and other businesses.
EN2 0LS	X
EN2 0BJ	X
EN2	x
EN2 0LJ	X
EN2 0BJ	X

EN2 0LS	X
EN2 0LS	X
EN2 0LS	X
EN2 0LS	X
EN2 0LS	X
EN2 0LS	X
EN2 0LS	X
EN2 8EQ	X
N21 3ES	It's appalling that Enfield Council is planning to build on green belt land when there is enough brownfield land available. <u>USE IT</u>
EN2 7NF	x
EN1 2AL	Leave us along
EN2 0TU	X
EN3 5LA	X
N21 1NX	It's the only garden centre I use
EN1 4TN	It's the only local place for plants, etc. [good variety]
EN2 9BX	X
EN2 9BX	X
EN2 0UG	X
EN2 9JQ	X
EN3 6GP	X
EN2 9JQ	X
EN3 5QL	X
EN2 0NS	X
EN2 0NS	X
	x
EN3 5UH	X
EN3 6XA	X
EN3 6XA	X
EN1 1QG	X
EN2 9BZ	X
EN2 9BZ	X
EN2 9BZ	X
EN2 9BZ	X
EN2 8BJ	I have lived in Enfield 70 years and I am passionate that my children and grandchildren can enjoy the beautiful green belt that I enjoyed as a child and now.
EN1 4LZ	X
EN2 7BS	X
EN1 1QG	X
EN1 3RE	X
EN2 9DB	X
EN2 7JN	X
EN1 2JA	Have a business in Crews Hill – which brings people to the area from all over North London and surrounds.
EN2	Losing of jobs unexceptable
N9 9JE	Enfield's green spaces should be protected for the future
EN2 7JN	x
[117]	

HA postcodes	
HA8 8TA	I come to this area not only for the lovely garden centres but for its nature and beauty that I can no longer find on my doorstep
HA9 6LY	X [Wembley]
HA9 6LY	x
HA9 8LZ	The garden centre are great. Don't build homes here! [Wembley]
HA4 0SG	Excellent shops. Fantastic garden centres. Nothing else like it. [Ruislip]
HA8	Best garden centres and shopping [Edgware]
HA3 0HN	X
HA3 0HN	x
HA8 5TA	X
HA7 2RT	x
[10]	
IG postcodes	
IG3 7HN	X [Ilford]
IG9 5TR	X [Buckhurst Hill]
IG10 1DZ	X [Loughton]
Loughton	Retain Green Belt land and excellent gardening facilities
Loughton	We have been coming up to Crews Hill for 30 years. It is so beautiful
IG10 1BL	Such a shame that this beautifully country place will be no more.
[6]	
HP postcodes	
HP3 0QH	X [Bovingdon]
HP3 0QH	x
HP1 3NN	Come here for all my garden needs. Plus grandchildren come for Christmas Santa. [Hemel Hempstead]
[3]	
CM postcodes	
CM16 6NF	X [Epping]
CM16 6NF	We visit here 7 times a year. [Epping]
CM20	Handy place to visit for all kinds of stuff [Harlow]
CM22 6TN	x
CM4 9AR	Always visiting the many garden centres at Crews Hill for plants, fish and social occasions. People need places like this to visit. [Ingatestone]
CM22 7FH	I visit Crews Hill often [Hatfield]
CM22	I visit Crews Hill regularly [Hatfield]
CM17 9MG	I visit Crews Hill on a regular basis. It would be devastating to build house on the Green Belt. [Harlow]

CM17 9RG	More space required, not more housing. [Harlow]
CM19 5HW	Lovely place to browse
CM19 5HW	X
CM17 9GP	X
CM22 6RH	X
CM3 6DE	X
CM23 3RE	Have been coming here for years, from child to adult
[15]	
NW postcodes	
NW4 4XB	Crews Hill is a hub for gardening. Shame for it to be gone.
NW4 2TH	I work in the area. The development of Enfield will affect negatively my job and career.
NW1 2BU	X
NW6 5FL	x
NW6 5FL	x
NW3 3HA	X
NW11 7 TH	This place is used by hundreds and thousands! Keep it going!
NW9 8DS	x
[8]	
N postcodes outside Enfield	
N12 9LE	x
N12 9HP	Long time visitor. Best garden centres around.
N12 9HP	This is the only place I can come to purchase plants, etc. in the North London area. Have been coming here for over 60 years.
N11 3BY	x
N17 7BJ	x
N12 7DE	X [Barnet]
N16 5SC	X [Stoke Newington]
N15 6HH	Crews Hill is a good place to find fun plants for the whole commute around
N20 0PL	It gives green space to London and we don't have much.
N4 3RT	I visit Crews Hill Garden Centres regularly.
N22 7XG	x
N20 0UU	x
N20 0UU	x
N7 7JY	I am a frequent recreational visitor to Enfield. I can use my Oyster car to visit Crews Hill also. I do a lot of walk around here. It's a lovely resource for inner London residents.
N22 5RD	x
N11 3BY	Have lived in this area for all my life. Would be very sad to see it go.
N17	X
N22 5RD	x

N11 1FQ	X
N11HN	We love coming here for supplies of our little green oasis. It would be a shame if these centres would close. We need nature around us for our well-being and mental health.
N22 8PW	X
N1 1HN	The garden centres are an important part of Enfield! Please don't re-develop these areas!!
N2 0TE	X
N19 5YJ	X
N5 2SU	X
N5 2SU	Like to visit every Sunday to shop and eat.
N4 4ST	Been coming to Crews Hill for a number of years for fish and gardening supplies.
N4 4ST	X
Tufnell Park	x
N11 1HN	X
N18 2RT	X
N8	Too important to local people for all sorts of reasons
N8 7NE	X
N8 9LU	The place has been our lifeline ever since I've discovered it. There is nothing else like it where you can shop for your garden, kitchen and home and look after your well-being too!
N9 7PL	Enfield Council. You are a disgrace thinking getting your hands on green space. Where are the wildlife going to go? Tut
N11	A disgrace. Such a great area for visiting with family.
N17 6AH	Been visiting since I was 5. Sad that my kids will not be able to visit my childhood pastimes.
N18 1XD	Open space, suitable for younger generation
N20 0AJ	X
N20 0AJ	x
[40]	
E postcodes	
E4 8AD	Many years of visiting open spaces would be a shame to see this go!
E7 0UE	x
E7 0JE	We so enjoy coming here to purchase the flowers/ plants + for the cemetery. It is much needed.
E17 7FE	x
E17 7FE	x
E4 9LR	We love to come to CrewsHill. An oasis of fresh air and green space.
E4 9LR	x
E3 4QF	I've been coming to Crews Hill for over 30 years and it's a beautiful place
E3 3EU	A lovely place to visit
E4 8HU	X
E4 6LH	x
E4 7HU	Crews Hill should remain as it's the best facility in the area
E4 7HU	X

E4 7ER	X
E4 7ER	X
E17 6AS	X
E7 8HE	X
E3 2NX	x
[18]	
AL postcodes	
AL7 4DT	Super convenient, perfect location and plenty of other place to build! [Welwyn Garden City]
AL7 4DT	x
AL4 OPS	This is our favourite place!! How very dare you!! [Colney Heath]
AL9 6HB	X [Essenden]
AL10 OPF	Supports local community [Hatfield]
AL2 1LQ	Lots of variety, have bought lots here over the years. [London Colney]
AL4 OPH	X
AL4 OOH	Local, child friendly, reasonable priced
AL2 3JC	X
AL4 9LY	X
AL4 9LY	X
AL10 9HP	X
AL10 9HP	X
AL7 4RY	X
AL8 7AL	X
AL7 2JA	x
[15]	
RM postcodes	
RM9 6NB	X [Dagenham]
RM6 5TJ	The variety of outlets mean choice unavailable elsewhere
RM1 4NS	I have been coming here to the garden centres for many years and would be very upset to see them go to make way for more homes. [Romford]
RM11 5JS	X
RM8 2XH	Only good garden centre
[5]	
SG postcodes	
SG2 0LX	A great selection of garden centres which enables competitive prices [Stevenage]
SG6 3HQ	Good for garden centres [Letchworth]
SG13 7QN	Garden Centers, best fish stores [Hertford Heath]

SG1 5PY	I work in the garden centre Crews Hill [Stevenage]
SG6 2LJ	X [Letchworth]
SG4 8UD	It would be a massive loss of local amenities
SG8 6GH	X
SG8 6GH	X
SG4 8UD	x
SG2 9DA	X
SG1 1BN	X
SG13 8RA	In my view Cattlegate Rd provides essential local shopping.
[12]	
WD postcodes	
WD6 1SZ	Crews Hill is a fantastic place to shop and it will disgrace to remove it. [Boreham Wood]
WD6 5JS	X [Borehamwood]
WD6 5JS	x
WD25 9SD	X
WD5 0JB	x
WD5 0JB	X
WD6 4PL	The Green Belt should be exactly as it says – Green Belt. There is too much development of such land.
WD6 3JU	This is a wonderful area for families to enjoy. It would be a shame to destroy something so important to the community
WD24 5NJ	To keep shops open to continue to replant and help climate
[9]	
LU postcodes	
LU5 4EM	We travel every weekend to visit the shops in this area. People enjoy this community all friendly. Do not take it away.
LU5 4EM	This area is important to us and the local economy. An excellent selection of niche shops and a breath of fresh air just outside London. Development would ruin this place. [Dunstable]
[2]	
CO Postcodes	
CO16 0HD	X
CO16 7HD	x
[2]	
MISC	
OX13 6DD	Brilliant garden centres [Wootton, Oxon]
Welwyn Garden City	x
SS15 6AW	x

SS15 6AW		Must not lose more green space
W1W 5DF		x
UB6 8HB		x
RG2 6AL		x
CV8 1FQ		X
CV8 1FQ		x
[9]		
TALLY FOR FIRST DAY		TALLY FOR SECOND DAY
Enfield postcodes	39	Enfield postcodes 78
EN non-Enfield	31	EN non-Enfield 40
IG	2	IG 4
Misc	2	Misc 7
HA	6	HA 4
NW	5	NW 3
RM	3	RM 2
WD	3	WD 6
LU	2	LU 0
AL	5	AL 10
HP	3	HP 0
E	9	E 9
N non-Enfield	18	N non-Enfield 22
SG	5	SG 7
CM	9	CM 6
CO	0	CO 2
TOTAL	142	TOTAL 200 [weekend total 342]

5. HAVE YOUR SAY

CHAPTER 2 GOOD GROWTH IN ENFIELD

ARE THERE KEY ASPECTS OF THE BOROUGH THAT THE COUNCIL HAS NOT CAPTURED IN THE SPATIAL PORTRAIT? A SPATIAL PORTRAIT DESCRIBES THE GEOGRAPHICAL CHARACTERISTICS OF THE BOROUGH, SETTING OUT WHERE THINGS ARE LOCATED IN ENFIELD.

Yes

(please specify)

- *Small shopping centres aren't mentioned and yet add to the local economy with small and medium enterprises (SME).*
- *Crews Hill is a thriving regional centre for gardening and retail and contributes to the local economy.*
- *The National Park [City](#) initiative is misunderstood.*

- *Farmland, farming and agriculture receive scant attention. There are thriving farms and this isn't mentioned.*
- *Equestrian sport not mentioned.*
- *The demographic description is limited and the risk is that this then undermines the strategic priorities*
 - *There were, for instance, 44.5k age 65+ residents in Enfield in 2019 projected to 53.8k in 2030, a 25% increase.*
 - *The borough profile is much clearer and more helpful than the spatial portrait*
 - <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/borough-profile-2021-your-council.pdf>
 - *The spatial portrait was repetitive, inaccessible and full of jargon, frustratingly so.*
 - *The office for national statistics has indicated that most output data from the 2021 census will not be released until March 2023. This might have been a good basis on which to plan.*
 - *Census data reveal that, compared to the average for London boroughs, Enfield had a slightly smaller white UK group (at 40.5% of total population), and relatively large numbers in the 'other white' group (18.2%) and in black groups (17.2%). It's surprising that this isn't reflected in the spatial portrait.*
 - *2.1.8 the policy [map](#) is incomprehensible.*

ARE THERE ANY KEY OPPORTUNITIES AND CHALLENGES FACING THE BOROUGH THAT THE COUNCIL HAS NOT IDENTIFIED?

Yes (please specify)

- *Opportunities exist*
 - *in higher education (Capel Manor College)*
 - *in farming, agriculture and horticulture as well as mixed woodland and farmland (agroforestry) that is gaining in popularity*
 - *in building on Crews Hill as a tourist attraction, not a housing development, and siting the tourist information and environmental interpretation centre there.*
- *Challenges*
 - *The lack of shade and green space in the east of the borough isn't recognised and important potential adaptations to the climate emergency as well as opportunities to address mental and physical health inequalities are overlooked*
 - *"Tiny [Forests](#)" are opportunities that should be grasped in the east of the borough, on larger recreation grounds and playing fields where there is little shade.*
 - *CPRE London's suggestion of Banbury Reservoir [Park](#) in the South East of Edmonton, adjacent to Meridian Water, also.*
 - *The older population is growing fastest of all and this isn't addressed as a strategic priority*

ARE THERE ANY KEY SPATIAL ISSUES THAT HAVE NOT BEEN CONSIDERED? SPATIAL ISSUES ARE THE SPECIFIC ECONOMIC, ENVIRONMENTAL AND SOCIAL ISSUES AFFECTING THE BOROUGH.

Yes (please specify) - see above and these observations on the 4 options:

- Option A - A lower target of 17,000 is justified and appropriate and these homes can be delivered on brownfield land without reducing industrial land
- Option B - Notwithstanding A, 25,000 homes could be built on viable and sustainable brownfield sites, without harm to the urban environment (with all the advantages this brings e.g. to urban greening, investment where it is needed etc.)
- Option C - The council's preferred option is itself flawed as it does not account for existing industrial uses at Crews Hill and the Green Belt housing sites are not sustainable and will not deliver either the type or quantum of affordable housing they suggest + multiple other issues with building on these GB sites (heritage, sprawl, biodiversity etc.), as well as being unnecessary (see A and B)
- Option D - Notwithstanding A-C, the scale of housebuilding put forward on GB sites is unnecessary. Furthermore, based on the draft LP, the sites themselves would not be utilised efficiently, which would unnecessarily increase urban sprawl, and increase the possibility of the need for further GB release in the future

CHAPTER 3 PLACE

HAVE WE INCLUDED ALL APPROPRIATE PLACEMAKING AREAS IN THE URBAN AREA TO ACCOMMODATE GROWTH?

ENFIELD TOWN

SOUTHBURY

EDMONTON GREEN

ANGEL EDMONTON

MERIDIAN WATER

SOUTHGATE

NEW SOUTHGATE

RURAL ENFIELD – A LEADING DESTINATION IN LONDON’S NATIONAL PARK CITY

CREWS HILL

CHASE PARK

No (please specify)

Brimsdown Areli Developments “is providing strategic planning and development advice toward the creation of a whole new town for London on 65 acres of riverside land” for 7500 homes in Brimsdown London. Yet this isn’t mentioned

ARE THERE ANY PROPOSED PLACEMAKING AREAS WE HAVE PROPOSED THAT YOU BELIEVE SHOULD NOT BE INCLUDED?

Yes (please specify)

Rural Enfield,

Chase Park

Crews Hill

Crews Hill and Chase Park are not “urban areas” and have no place in “accommodating growth”. They are designated Green Belt (see maps p 10 – 15 and appendices) and should not be de-designated as proposed.

The “vision” for Rural Enfield is wholly ill-conceived.

ENFIELD TOWN

DOES THE VISION FOR ENFIELD TOWN SET OUT AN APPROPRIATE VISION FOR ITS FUTURE? IF NOT, WHAT COMPONENTS DO YOU THINK SHOULD BE CHANGED OR ARE MISSING?

No

(please specify)

- *The carbon emissions in demolition and rebuilding are unacceptable in a climate emergency, especially in buildings that are only a few decades old.*
- *Why are we urged to recycle, repair, reuse, repurpose domestically but not in our town centres?*
- *<https://www.ribaj.com/intelligence/news-catch-up-lacaton-and-vassal-pritzker-prize-destination-bootle-ellis-williams-architects-sefton-planning-climate-emergency-antepavilion-spheron-architects-southwark-diversity>*
 - *We should be adapting existing buildings wherever possible, building upwards perhaps, as has already been done in Lytchett way, Southbury ward.*

WILL THE PROPOSED ENFIELD TOWN PLACEMAKING POLICY HELP TO ADEQUATELY DELIVER THE ASPIRATIONS SET OUT IN THE VISION? IF NOT, WHAT PROPOSED CHANGES, OMISSIONS OR ADDITIONS ARE REQUIRED IN THE POLICY TO HELP DELIVER THE VISION?

No *(please specify)*

- *see above.*
- *The policy is profoundly limited, as is the vision.*
- *Enfield Town is a conservation area and yet the policy speaks of "new built form" .*
 - *Tall buildings and other high-density developments are envisaged. But what does this mean ?*
 - *The tall buildings policy is ambiguous.*
 - *Words like "appropriate" are subjective.*
 - *Where is the policy on e.g. mansion blocks ?*
 - *Where is an analysis of building design for adaptation to climate emergency ?*
 - *Lifts use electricity.*
 - *How is shade provided in tower blocks ?*
 - *How is 100 degree heat mitigated ?*
 - *What's the policy on air conditioning which consumes electricity and emits heat ?*
- *The old magistrates court is marked as a development site but not mentioned in the site allocations*
- *The plan doesn't seem to address practical elements of retail and a major destination shopping area*
 - *e.g. car parking provision and servicing,*

- recognition that Enfield Town will become the main shopping destination, especially when they build on all the out of town shopping areas - “varied retail” is meaningless .
- “Greening” the town e.g.
 - encourage innovative growing projects on car park roofs?
 - aiming for a greener high street (a true national park city approach)?
 - encouraging more street trees
 - incentives for green business and ventures that promote sustainability.
 - a cycle route will be created in the edge of the Golf Club and around the Town Park – no bad thing but we wonder if cyclists would not just take a short cut across the park?

SOUTHBURY

DOES THE VISION FOR SOUTHBURY SET OUT AN APPROPRIATE VISION FOR THE FUTURE OF THIS PLACE? IF NOT, WHAT COMPONENTS DO YOU THINK SHOULD BE CHANGED OR ARE MISSING?

No (please specify)

- *A master plan for the area would properly inform residents of what is proposed and prospective developers could reasonably be expected to play their part in formulating this in exchange for their potential profits. Eg [Uplands](#) Business Park, Blackhorse Rd, Waltham Forest*
- *The map is confusing as there are areas and zones highlighted as Site Allocations, but no further information has been given about these (e.g. are these for SIL or housing?). There are 7 sites allocated on the map, but just 5 mentioned in the Explanation.*
- *Other maps show other areas will be designated as SIL, yet this is not articulated in the vision or on the map provided here e.g De Mandiville Retail Park and Enfield Retail Park. These inconsistencies are confusing.*
- *The map shows a Green Link running the length of Southbury Road – however “Green Link” is not defined in the Glossary, and it is unclear how a “Green Link” along Southbury Road would be implemented in practice.*
- *Major housing has been proposed without proper access to greenspace on the east side of the A10, meaning residents, including children will need to cross a very busy major road to access a proper park. A more specific vision is needed regarding how crossing the A10 can be improved for pedestrians and cyclists e.g. new bridges, underpass etc. Furthermore, a few tokenistic pocket parks are a wholly inadequate response to the level of residential building envisaged for the area, not to mention other needs e.g. growing spaces, allotments etc.*
- *The “Enhanced access to blue/green infrastructure” appears to be not much more than an exercise in sticking green stars on existing park entrances*
- *Cycle routes are proposed for almost every pedestrian pathway across Bush Hill Park and Enfield Playing Fields. Whilst encouragement of cycling is welcome this should be balanced*

with the needs of other park users e.g, those on foot. Why are pedestrian footpaths being allocated as cycle paths?

- *New cycle lanes are envisaged in both directions, despite there already being cycle lanes in both directions - why can't existing cycle infrastructure be improved?*

WILL THE PROPOSED PLACEMAKING POLICY FOR SOUTHBURY HELP TO ADEQUATELY DELIVER THE ASPIRATIONS SET OUT IN THE VISION? IF NOT, WHAT PROPOSED CHANGES, OMISSIONS OR ADDITIONS ARE REQUIRED IN THE POLICY TO HELP DELIVER THE VISION?

No (please specify) - see above

EDMONTON GREEN

DOES THE VISION FOR EDMONTON GREEN SET OUT AN APPROPRIATE VISION FOR THE FUTURE OF THIS PLACE? IF NOT, WHAT COMPONENTS DO YOU THINK SHOULD BE CHANGED OR ARE MISSING?

No (please specify)

- *as per Enfield Town, general principles regarding adapting to climate emergency*
- *additionally, no mention is made of the impact of the proposed Edmonton incinerator on*
 - *house prices*
 - *the environment*
 - *pollution*
 - *health.*
- *nothing is included about adaptation to climate provision e.g. trees for shade*
- *As with Southbury, the Green Links appear to be nothing more than dots on a map, but there seems to be no clarity about how this vision could be implemented in practice*
- *There seem to be a large number of "intensification opportunities" highlighted on the map, but it is unclear what these actually are. What is an "intensification opportunity" exactly – there is no definition in the glossary?*

WILL THE PROPOSED PLACEMAKING POLICY FOR EDMONTON GREEN HELP TO ADEQUATELY DELIVER THE ASPIRATIONS SET OUT IN THE VISION? IF NOT, WHAT PROPOSED CHANGES, OMISSIONS OR ADDITIONS ARE REQUIRED IN THE POLICY TO HELP DELIVER THE VISION?

No (please specify)

- *as per Enfield Town, general principles regarding adapting to climate emergency as above*

ANGEL EDMONTON

DOES THE VISION FOR ANGEL EDMONTON SET OUT AN APPROPRIATE VISION FOR THE FUTURE OF THIS PLACE? IF NOT, WHAT COMPONENTS DO YOU THINK SHOULD BE CHANGED OR ARE MISSING?

No (please specify)

- *as above, but more so as The Angel Edmonton is in the shadow of the incinerator*

WILL THE PROPOSED PLACEMAKING POLICY FOR ANGEL EDMONTON HELP TO ADEQUATELY DELIVER THE ASPIRATIONS SET OUT IN THE VISION? IF NOT, WHAT PROPOSED CHANGES, OMISSIONS OR ADDITIONS ARE REQUIRED IN THE POLICY TO HELP DELIVER THE VISION?

No (please specify) - **as all previous**

MERIDIAN WATER

DOES THE VISION FOR MERIDIAN WATER SET OUT AN APPROPRIATE VISION FOR THE FUTURE OF THIS PLACE? IF NOT, WHAT COMPONENTS DO YOU THINK SHOULD BE CHANGED OR ARE MISSING?

No (please specify)

- *Absolutely not. The vision says that "It will be a place where Enfield residents and Londoners can afford to live" - this is untrue. The nature of the homes proposed means that a limited number will be affordable to Enfield residents - the majority will not be affordable to Enfield residents. The scheme needs to deliver more social rent family housing and more London Living Rent family housing. There is currently far too much emphasis on private properties, built to rent and shared ownership (none of which address local housing needs)*
- *It is notable that a part of the vision is that "there will be a burgeoning economy for makers and creators", which is precisely what the council is proposing removing at Crews Hill.*
- *The vision says "Meridian Water will be a model for sustainable neighbourhoods with exceptional environmental credentials," however, this is not true. The scheme fails to deliver a suitable level of usable greenspace and the impact of air pollution from the incinerator and major roads (A406, Meridian Way) have been almost completely ignored. We are aware that the council has stopped the publication of a scrutiny committee report that examined the environmental credentials of the scheme.*
- *Furthermore, the residential properties in Phase 1 and Phase 2 will be severed from greenspace as a result of the council's vision not to develop the east bank areas for housing.*
- *The suggestion that greenspace should be measured as a % of the entire area is highly problematic. Greenspace should be based on the ratio of people to greenspace (as the council itself admits elsewhere in the Local Plan), to change the rules for Meridian Water is unacceptable and will lead to a poor provision of greenspace for future residents, in an area that already has a significant deficit of greenspace.*
- *Very little, if anything, is said about how the scheme will connect existing communities in Edmonton with the Lee Valley Regional Park and new greenspaces. Previous iterations of the scheme looked to remedy this by incorporating new bridges into the scheme, which would reduce severance caused by the railway, roads, and river. These benefits now seem to have been removed in this latest vision.*
- *Not including the Harbet Road (east bank) into the site allocations and vision is a huge mistake. This needs to be dealt with now. If this area is not going to be de-designated then the scheme must change to reflect this now. Calling this "safeguarding" is highly misleading and shows a complete lack of understanding about the consequences of this approach.*
- *The vision talks about net gains in biodiversity, yet does not address the impact of the scheme on the existing greenspaces, such as Tottenham Marshes.*
- *Furthermore, many tall buildings are envisaged for Meridian Water, despite evidence to show the negative impact of tall tower blocks on affordability, the environment, mental health and the ability to deliver the type of child friendly housing needed.*

- *It is infuriating that so much underused greenspace surrounding Meridian Water is completely ignored in this vision - Why isn't the CPRE vision for Banbury Reservoir park being considered?*
- *Shockingly, the vision makes no mention of the existing employers and employees on the site. Many jobs with the existing employers on the site will be lost as a result of the development and part of the vision must be ensuring that these jobs are protected, or that alternative suitable sites and solutions are offered. This is especially important as many of the job losses will impacted groups with protected characteristics.*
- *previous with special concern for sufficient green space per capita, family homes and proximity to the incinerator.*
- **WILL THE PROPOSED PLACEMAKING POLICY FOR MERIDIAN WATER HELP TO ADEQUATELY DELIVER THE ASPIRATIONS SET OUT IN THE VISION? IF NOT, WHAT PROPOSED CHANGES, OMISSIONS OR ADDITIONS ARE REQUIRED IN THE POLICY TO HELP DELIVER THE VISION?**

No (please specify) - as previous

RURAL ENFIELD

DO YOU SUPPORT THE DESIGNATION OF RURAL ENFIELD AS A LEADING TRANSFORMATIVE DESTINATION WITHIN LONDON NATIONAL PARK CITY?

No (please specify)

The London National Park City [Foundation](#) have expressed a view on this with which we agree

DO YOU FEEL THE POLICY COVERS THE RIGHT AREA OF THE BOROUGH? IF NOT, WHAT CHANGES WOULD YOU MAKE?

No (please specify)

- *It's an inappropriate use of this national initiative.*

DO YOU FEEL THE POLICY COULD BE IMPROVED?

Yes (please specify)

- ***A policy on Rural Enfield is welcome. This is the wrong one and wholly ill conceived.***

CREWS HILL

DOES THE VISION FOR CREWS HILL SET OUT AN APPROPRIATE VISION FOR THE FUTURE OF THIS PLACE? IF NOT, WHAT COMPONENTS DO YOU THINK SHOULD BE CHANGED OR ARE MISSING?

No (please specify)

- *The "vision" for Crews Hill should build on what exists...*
 - *heritage,*
 - *economy,*
 - *skills*
 - *to provide a market garden centre providing local sustainable food for Enfield.*
- *Access to existing woodlands (the natural burial site at Sloeman's farm for instance) would help as would opportunities for energy generation (wind and solar) providing local skilled jobs and perhaps a small housing settlement around the station, council or housing association (not developer) led and demonstrably affordable (social rent)*

WILL THE PROPOSED PLACEMAKING POLICY FOR CREWS HILL HELP TO ADEQUATELY DELIVER THE ASPIRATIONS SET OUT IN THE VISION? IF NOT, WHAT PROPOSED CHANGES, OMISSIONS OR ADDITIONS ARE REQUIRED IN THE POLICY TO HELP DELIVER THE VISION?

No (please specify) –

- *The “vision” is ill conceived. See above.*
- *It's a rural area on the outskirts of London, a unique, regionally popular and well known, economically successful hub for gardening and gardeners.*
- *Why change it into (yet) another exclusive housing estate like the one at Trent Park ?*
 - *We understand Berkeley Homes (developers of Trent Park executive housing estate) either own or have taken options on large areas of Crews Hill.*
- ***Crews Hill should be removed as a place making area growth accommodation area.***

CHASE PARK

DOES THE VISION FOR CHASE PARK SET OUT AN APPROPRIATE VISION FOR THE FUTURE OF THIS PLACE? IF NOT, WHAT COMPONENTS DO YOU THINK SHOULD BE CHANGED OR ARE MISSING?

No (please specify)

- *It's Green Belt.*
- *It's a farm.*
 - *Climate emergency is likely to lead to food insecurity.*
- *It's a beautiful rural area criss-crossed with public rights of way.*
- *It has a history and a heritage going back centuries.*
- *Why would anyone turn it into an executive housing estate that will not be affordable for families who need homes ?*
- *There is no infrastructure and when this is included in the viability assessment the developers will negotiate “affordable homes” out of existence.*
- *It is open space that is important to the wellbeing of residents in surrounding wards that are already known to have significant deficiencies in greenspace provision i.e. Town and Highlands wards.*

WILL THE PROPOSED PLACEMAKING POLICY FOR CHASE PARK HELP TO ADEQUATELY DELIVER THE ASPIRATIONS SET OUT IN THE VISION? IF NOT, WHAT PROPOSED CHANGES, OMISSIONS OR ADDITIONS ARE REQUIRED IN THE POLICY TO HELP DELIVER THE VISION?

No (please specify)

- ***Chase Park should be removed as a place making policy area.***

CHAPTER 4 SUSTAINABLE ENFIELD

RESPONDING TO THE CLIMATE EMERGENCY

ARE THERE ANY OTHER MEASURES THAT SHOULD BE INCLUDED IN THE LOCAL PLAN TO HELP TACKLE THE CLIMATE EMERGENCY?

There is a character limit of 255 in this section. Our response is necessarily succinct.

- *Good in principle.*

- Contradictory of other elements of the plan (building on green belt, no shade, insufficient green space in east, farming overlooked).

SUSTAINABLE DESIGN AND CONSTRUCTION

IS THIS THE RIGHT WAY TO SUPPORT SUSTAINABLE DESIGN AND CONSTRUCTION? HAVE WE ADDRESSED THE NECESSARY KEY CONSIDERATIONS?

No (please specify)

- no consideration given to re-using existing buildings. See earlier.
<https://www.theguardian.com/artanddesign/2021/mar/16/lacaton-vassal-unflashy-french-architectures-pritzker-prize>

GREENHOUSE GAS EMISSIONS AND LOW CARBON DEVELOPMENT

IS % OVER PART L THE RIGHT MEASURE FOR REDUCING GREENHOUSE GAS EMISSIONS?

No (please specify)

- it isn't clear anywhere in the proposal what "**% over part L**" means. It doesn't appear in the text, only the question.

RENEWABLE ENERGY DEVELOPMENT

IS THIS THE RIGHT APPROACH TO PROPERLY MANAGING THE POTENTIAL IMPACTS OF RENEWABLE ENERGY DEVELOPMENT?

Yes

CLIMATE CHANGE ADAPTION AND MANAGING HEAT RISK

DOES THIS POLICY SET OUT A ROBUST FRAMEWORK FOR MANAGING HEAT RISK?

No (please specify)

- Actually, yes, but the response needs qualifying. The policy seems inconsistent with other policies eg on high rise, Meridian Water (sufficiency of green space per capita).
- In any case, how much weight will this policy carry with developers?
- And how effective will the council be on enforcement when it hasn't satisfactorily enforced against breaches of Green Belt in Crews Hill for instance.

CHAPTER 5 ADDRESSING EQUALITY

AND IMPROVING HEALTH AND WELLBEING

HOW BEST CAN THE ENFIELD LOCAL PLAN PROVIDE FOR OUR FUTURE COMMUNITY NEEDS TO SECURE A SUSTAINED HIGH QUALITY OF LIFE AND WELL-BEING HAVING REGARD TO FUTURE GROWTH?

- Policies SP SC1 and SP SC2 are sound.
- However the borough profile says that among working-age people (aged 16-64 years), 53,000 had some level of disability – around 25% of the working-age population.
- The over 65s are the fastest growing demographic.

- *Explicit policy provision should be made for these groups if their needs are to be met to make this a truly inclusive plan for “**more homes, transport and social infrastructure and health care**” as stated in the summary of the local plan circulated to all homes.*

ARE THERE ANY SPECIFIC ISSUES REGARDING EDUCATIONAL PROVISION THAT YOU CONSIDER NEED TO BE ADDRESSED WITH RESPECT TO NEW DEVELOPMENT?

- *Capel Manor College is London’s only specialist environmental college, and world class but its potential for the future is not recognised.*
- *It offers specialist education in areas that are crucially relevant to the climate emergency.*
- *Yet the economic importance of land based projects, agriculture, viticulture, horticulture, animal husbandry, agroforestry, to name a few, are not addressed.*

HOW DO YOU CONSIDER THAT HEALTH ISSUES SHOULD BE ADDRESSED IN THE LOCAL PLAN? HOW CAN NEW DEVELOPMENT ENCOURAGE HEALTHY LIFESTYLES?

- *The policies are sound as far as they go.*
- *The fragile nature of Enfield’s health economy (arising from demographic changes since the allocation formula was set) isn't considered.*
- *Policies that encourage increased population and disproportionate numbers of care homes add to the demands of primary health.*

DO YOU HAVE ANY OTHER ISSUES/COMMENTS?

- *The borough [profile](#) (p9 – 13) estimates*
 - *35% of Enfield residents are White British.*
 - *26% Other White ethnic groups.*
 - *Black ethnic groups are estimated at 18%,*
 - *Asian 11%.*
 - *Black ethnic groups are more numerous than any other groups and yet are not mentioned, though Greek and Turkish speaking groups are singled out for special mention. Why ?*

CHAPTER 6 BLUE GREEN ENFIELD

HOW BEST DO WE PROTECT AND ENHANCE OUR BLUE AND GREEN NETWORK IN THE FACE OF INCREASING GROWTH AND DEVELOPMENT PRESSURES?

- *by fully exploring and utilising brownfield for housing. Exploiting opportunities in the East of Enfield that provide land for woodlands and parks. "Tiny forests", increasing green space in MW to an appropriate per capita value. Banbury reservoir park*
- *retain the green belt in its entirety*
- *redevelopment of brownfield sites should be prioritised, and part of any redevelopment must be the provision of adequate greenspace e.g. parks, allotments, playing pitches, street trees, tiny forests etc. In short, really delivering against the objectives of the London National Park City Foundation.*

DO YOU AGREE WITH OUR APPROACH TO ENCOURAGE FOOD PRODUCTION?

No (please specify)

- *At a time of climate emergency when food security could become a serious and significant issue, sustainable food production should not be peripheral "food growing spaces, such as roof gardens, allotments and community orchards" but central to the local plan and deserving of its own policy and strategy.*
- *Allotments, roof gardens, community orchards are not the answer to food production.*
- *It's really not about building developer-led housing estates or planting woodland on farmland but about consulting seriously with experts and the community to create innovative solutions to the imminent challenge of food security eg agro-forestry, market gardening, hydroponics etc*

CAN YOU GIVE US PRACTICAL EXAMPLES OF HOW WE WORK WITH OTHER STAKEHOLDERS, FUNDING BODIES AND DEVELOPERS TO IDENTIFY OPPORTUNITIES TO PROMOTE AND ENHANCE THE NATURAL ENVIRONMENT, AND INCORPORATE NET GAINS FOR BIODIVERSITY?

- *EnCaf's Land use working group published a [response](#) to the council's blue green strategy in December 2020.*
- *Thames Water owns significant tracts of underused green and blue spaces, which could be enhanced to help promote the natural environment.*

IS POLICY BG10 BURIAL AND CREMATORIUM SPACES THE RIGHT APPROACH TO MEET OUR NEEDS?

No (please specify)

- *We chose "No" because otherwise there is no opportunity to comment. The natural burial ground on Sloeman's Farm is a good idea. SA59 Firs Farm we don't think should be used for a crematorium adjacent to a nature reserve.*
- *SA61 – Church Street Recreation Site should be changed to Churchfield Recreation Ground. The former is well used, in an area of deficit in terms of greenspace, the latter is not well used and the recreation fields themselves are in disrepair.*
- *SA58 – Alma Road Open Space - this area should be used as part of a network of green spaces, incorporating a bridge over the train tracks to help improve access to the Lee Valley regional Park and Lee River walkway. This could possibly be accommodated alongside cemetery use*
- *Generally speaking burial needs could be a way to use some Green Belt areas, and existing green areas in urban areas should be protected and improved.*

DO YOU THINK IT IS ACCEPTABLE TO PLAN FOR A SHORTFALL OF SPACE WITHIN THE BOROUGH BOUNDARY AND PROMOTE CROSS BORDER EXPANSION INSTEAD?

IF YOU THINK WE SHOULD MEET LOCAL NEEDS, WHERE SHOULD IT BE?

MORE BURIAL SPACE IN THE URBAN AREA – WHERE?

INTENSIFICATION OF SUBURBAN AREAS?

BUILD ON SOME PUBLIC OPEN SPACE?

RELEASE OF GREEN BELT LAND ON THE EDGE OF THE BOROUGH?

IF OTHER, PLEASE SPECIFY

- 255 characters is not sufficient to do justice to 5 questions, **and** make a comment.

CHAPTER 7 DESIGN AND CHARACTER

DO YOU HAVE ANY OTHER ISSUES/COMMENTS?

- 255 characters is insufficient to do justice to 40 pages and 15 policy statements. All that can be said is that policies on views, heritage, tall buildings, and more, are inconsistent with the proposals made elsewhere in the local plan.
- However we'd nevertheless observe that
 - we are pleased to see that the draft contains a policy to set out max building heights across the borough, although in many cases these are still relatively high compared to the surrounding environment.
 - The Local Plan does not safeguard against buildings taller than this, as the Local Plan as drafted would allow taller buildings if the benefits were considered to outweigh the harms. As a result the building height policy is at best flexible or possibly meaningless.
 - "appropriate locations" for tall buildings are shown in fig 7.4 p 158.
 - this shows the maximum building heights based on an allowance of 3m per floor. The storey heights for some of the locations are provided in the table below.
 - according to para 7.6.2 page 159 of the draft local plan [these heights are] "based on a rigorous assessment of townscape, character and the sustainability of the location for higher density development". For comparison, the current Enfield Civic Centre is 13 storeys (39m) high.
 - The London plan defines a tall building as anything over 21 m.

Height (storeys)	Height (metres)	"appropriate locations"
26	78	Meridian Water
23	69	Edmonton Green
17	51	Enfield Town Station
16	48	Southbury Station, Silver Street, Brimsdown
15	45	Cockfosters station
13	39	Palace Gardens, Enfield, Southgate Circus
13	39	Enfield Civic Centre
11	33	Enfield Chase station, Palmers Green, Oakwood station
9	27	Arnos Grove

CHAPTER 8 HOMES FOR ALL

AFFORDABLE HOUSING

DO YOU CONSIDER THAT, IF SUPPORTED BY VIABILITY EVIDENCE, THE TARGET FOR PROVIDING AFFORDABLE HOUSING ON HOUSING SITES SHOULD BE INCREASED? IF SO, WHAT PERCENTAGE OF AFFORDABLE HOUSING SHOULD THE COUNCIL BE SEEKING?

SHOULD THE COUNCIL SEEK TO USE THE THRESHOLD FOR AFFORDABLE HOUSING OF 10 DWELLINGS ON SITE? ARE THERE OCCASIONS WHEN IT MAY NOT BE APPROPRIATE AND IF SO, WHAT SHOULD THE THRESHOLDS BE?

- *With 5000 children in temporary accommodation the need for family housing, and the financial cost to the council, is so acute that all (100%) new housing should be affordable to the families in need and at social rent*
- *Shared ownership is not affordable.*
- *The priority is for truly affordable key worker housing and social rents.*
- *Developer-led housing estates subject to viability assessment consistently fail to deliver what's needed.*
- *The approach to the Local Plan as far as this is concerned is entirely ill-conceived.*
- *In order to meet the existing need for housing without putting a burden on the existing strained transport, health and social infrastructure, 100% need to be at social rent and on existing brownfield sites where the infrastructure exists.*

DO YOU AGREE WITH THE DRAFT POLICY APPROACH SET OUT IN H3 HOUSING MIX AND TYPE, H4 SMALL SITES AND SMALLER HOUSING DEVELOPMENT, H5 SUPPORTED AND SPECIALIST HOUSING, H6 COMMUNITY LED HOUSING, H7 BUILD TO RENT, H8 LARGE SCALE PURPOSE BUILT SHARED HOUSING AND H9 STUDENT ACCOMMODATION?

IF NOT, WHAT CHANGES WOULD YOU SUGGEST?

No (please specify)

- *No, not really. Some of the policies are sound in principle eg student accommodation. But overall the answer to Q44 stands.*
- *These policies tinker at the edges.*
- *Small sites are a good solution and historically contribute significantly to providing homes. However there is no stated requirement on affordability.*
- *Further this is just one question, seeking a response to 7 policy statements (H3 – H9). To follow are five questions on one policy statement. It's hard to respond meaningfully.*
- *However, it's worth noting that according to the Borough Profile*
 - *p20 Enfield is in the top 10% most deprived Average London boroughs on the "deprivation domain" described as "Barriers to Housing & Services".*
 - *As of February 2021, there were 48,562 resident households in the borough (around 37%) receiving state help with their housing rental costs:*
 - *23,618 were on Housing Benefit*
 - *24,944 were claiming the Housing element of Universal Credit, currently being rolled out to replace Housing Benefit*
 - *64% of all benefits for Housing costs are paid to households living in the Private Rented Sector.*
 - *The number of households receiving Housing costs support increased by nearly a quarter (23%) between February 2020 and February 2021 (p22).*
- *Regrettably, these policies don't address the acute need for affordable homes.*

GYPSY AND TRAVELLER ACCOMMODATION

- *There are five questions on this one policy, compared with one question on 7 policies previously.*

CHAPTER 9 ECONOMY

PROTECTING EMPLOYMENT LOCATIONS AND MANAGING CHANGE

IS THIS THE RIGHT WAY TO PROTECT INDUSTRIAL BUSINESSES IN THE BOROUGH?

No (please specify)

- *Crews Hill Garden Centres currently provide employment and add to the economy.*
- *An enlightened approach consistent with the demands of adaptation to the climate emergency would see it developed into a market gardening regional hub providing local sustainable food supply for local people with more skilled jobs.*
- ***Not** put in the hands of developers to become a housing estate that would add to population pressures on the social infrastructure (school, primary health) and increase domestic motorised transport and carbon emissions.*

POLICIES: RE1 CHARACTER OF THE GREEN BELT AND OPEN COUNTRYSIDE, RE2 IMPROVING ACCESS TO THE COUNTRYSIDE AND GREEN CORRIDORS, RE3 SUPPORTING THE RURAL ECONOMY AND RE4 FARM DIVERSIFICATION AND RURAL EMPLOYMENT

CHAPTER 11 RURAL ENFIELD

DO YOU AGREE WITH THE DRAFT POLICY APPROACH SET OUT IN RE1 TO RE4?

IF NOT, WHAT CHANGES WOULD YOU SUGGEST?

No (please specify)

- *RE1 states "Development adjoining or within close proximity to the Green Belt (as shown on the Policies Map) will only be permitted if 1a - 1f are not infringed."*
 - *PL9 Crews Hill and PL10 Chase Park (Vicarage Farm) breach these conditions.*
- *RE2 states that new developments will be expected to protect, maintain and improve Enfield's network of walking routes with 2a- 2f as a priority.*
 - *Merryhills Way through Vicarage Farm, a public right of way, and the associated view will be violated by PL10 Chase Park.*
 - *Further, RE2 states that the borough has a legal duty to protect rights of way. PL10 Chase Park will make that impossible.*
 - *RE3 is about supporting the rural economy.*
 - *RE4 indicates a policy direction from agriculture.*
 - *These policies are, in the light of potential food insecurity due to climate emergency, retrograde.*
 - *We should be enhancing and increasing agriculture and market gardening opportunities in Crews Hill and Vicarage Farm; reinforcing the rural economy, green*

jobs etc by building on what is there as explained in EnCaf's [response](#) to the Blue Green Strategy

- there should be no development adjoining or within close proximity to the green belt
- there should be no de-designation of the green belt
- the policy fails to protect and enhance the character of the landscape within or in close proximity to the green belt and should be abandoned
- there is a clear need post covid to improve access to the countryside and green corridors for pedestrians, equestrians, cyclists. But the policies that should complement policies about Rural Enfield do not:
 - failure to provide sufficient green space to the east of the borough
 - transformational initiatives eg cpre city parks initiative: banbury reservoir park, "tiny forests" are overlooked
 - there are no moves to improve public transport from east to west of Enfield to enable access to the largest green spaces.
- PTALs in Chase Park and Crews Hill are poor and an increase in motorised transport is inevitable across the green belt.

CHAPTER 12 CULTURE, LEISURE AND RECREATION

DO YOU AGREE WITH THE DRAFT POLICY APPROACH SET OUT IN CL1 TO CL6?

IF NOT, WHAT CHANGES WOULD YOU SUGGEST?

No (please specify)

- DMCL2 explains that the Council "*considers that the leisure and visitor experience in the borough has the potential to contribute significantly to Enfield's economic growth. It can contribute to enhancing quality of life through delivering experiences for visitors and a greater variety of jobs and training opportunities. Importantly, it can help support regeneration, and diversify and develop the rural economy*".
 - PL9 Crews Hill undermines this policy.
 - Crews Hill provides all of this and could, with enlightened policy, building on community strengths and capitalising on inward investment, do even more to enhance leisure and tourism.

CHAPTER 13 MOVEMENT AND CONNECTIVITY

DO YOU AGREE WITH THE DRAFT POLICY APPROACHES SET OUT IN T1 AND T2?

IF NOT, WHAT CHANGES WOULD YOU SUGGEST?

No (please specify)

- The topic papers on PL9 Crews Hill and PL10 Chase Park (Vicarage Farm) provide assessments of PTAL and estimates of travelling time to transport hubs that are wholly unrealistic in terms of
 - a demographic (65+) that is growing faster than any other
 - the fact that 25% of the working-age population have a disability

- *families with young children for whom the housing estates are allegedly being built*
- *PL9 Crews Hill and PL10 Chase Park (Vicarage Farm) will increase domestic car ownership and journeys as the homes will be too distant from railway stations.*
- *This is neither promoting sustainable transport nor active transport. Quite the contrary.*
- *And will, further, make the homes inaccessible in terms of transport as well as price for those families which desperately need them.*

CHAPTER 14 ENVIRONMENTAL PROTECTION

DO YOU AGREE WITH THE DRAFT POLICY? IF NOT, WHAT CHANGES WOULD YOU SUGGEST?

No (please specify)

- *ENV1 explains*
 - *"Whilst there is legislation to control emissions from polluting activities, the planning system has a complementary role in directing the location of development that may give rise to environmental protection problems. This can manifest itself either directly from the development or indirectly; for example, through the impact of potential traffic it generates.*
 - *There are two strands to all environmental policy; to ensure new development proposals do not generate issues which unduly impact on the surrounding environment, and to ensure they are not the recipients of existing issues.*
 - *Similarly, it is important that existing lawful uses do not become compromised by virtue of subsequent new development.*
 - *Environmental protection is linked with ELP's objectives to minimise impact of development on climate change and the environment and require new development to provide environmental improvements.*
 - *The Borough is committed to protecting existing environmental quality and where possible reducing adverse effects on the local and natural environment as a result of changes in activities or from new development".*
- *It's difficult to see how PL9 Crews Hill and PL10 Chase Park (Vicarage Farm) are consistent with this policy. By building housing estates on the green belt it drives a coach and horses through the environmental protection of those areas in respect of light pollution, air pollution (increased motor cars), and noise.*

DO YOU HAVE ANY OTHER ISSUES / COMMENTS

- *Key information is presented in a way that appears designed to prejudice the consultation responses. For example, the 'pros' and 'cons' of the alternative spatial options have been set out in the Plan (e.g. at Tables 2.2 and 8.3), but these have not been presented in an objective and even-handed manner.*
- *There are 'cons' missing from the council's preferred option, whilst 'pros' are missing from the alternative options.*

- *Presenting key information in this way appears to be an attempt to influence and lead public opinion towards supporting the council's preferred option.*
- *Some responses are limited to 255 characters. Some policy papers have up to 10 specific questions. In other cases as many as 7 policy papers are dealt with collectively in one question. This seems, at best, arbitrary and in the light of the above, partisan.*