
As residents of Enfield for over 40 years we are disappointed and dismayed at the Council's Draft Local Plan, both in content and presentation, in particular:

The absence of any Executive Summary – the draft plan is hundreds of pages long, difficult to navigate and full of jargon such as “placemaking” and “blue/green” which appears designed to mask the impact of major house building in currently green areas. If the consultation is meant effectively to engage with local people it should at the very least have been accompanied by a comprehensible summary. This is very poor practice on the part of the Council.

The plans to build on green belt – including on part of the historic area of Enfield Chase - a rare and valuable landscape asset and one whose loss would cause permanent harm to the Green Belt and the character of the borough. Such policies are contrary both to the London Mayor's own plan and to Government policy: see for example this statement from the Ministry of Housing , Communities and Local Government reported on the BBC News on 31 Aug: *"Protecting the green belt is a priority and our national planning policy reinforces regenerating brownfield sites and prioritising urban areas."*

The Draft Plan is far from persuasive in its arguments for building on green belt land, and the Council's arguments are not helped by the sorts of crass comment attributed to the Council Leader along the lines that *'if dense development is appropriate around Edmonton Town station, why not also for Crews Hill station?'* The two situations simply cannot be compared.

Furthermore, proposed housing on the green belt close to the Ridgeway ('Chase Park') would not deliver the affordable family housing that Enfield needs – witness what has happened with housing development on the Trent Park site. And it would rob local people of access to open space that is much valued and well used.

Misleading information - for example:

- among Enfield's attractions, the Draft Plan cites its location *"within easy reach of the open countryside and central London . . . [offering] unrivalled access to sporting attractions, including golf courses (e.g. Whitewebbs Park)"* (page 178, 12.4.1). But as we know the Council itself has already closed Whitewebbs golf course!!
- the statement that *"Enfield Council has a statutory duty to provide 1,246 dwellings each year"*. In fact there is no statutory duty to provide any fixed number of homes each year. Notwithstanding the London Plan, the actual number of homes to be provided has to take account of constraints and opportunities, as well as the implications for the character of local areas.

- claims in the recent leaflet from the Council Leader *that “Our plan also guards against the development of skyscrapers being built in inappropriate locations across our borough, so that we can continue to enhance Enfield’s historic heritage.”* On the contrary, the Draft Plan contains proposals for a whole series of high rise developments scattered inappropriately across the Borough including, worryingly, ones that would threaten the Enfield Town Conservation Area and the historic market place.

Lack of depth – it is hard to find any realistic assessment in the Draft Plan of the displacement effects of proposed development over station and supermarket car parks, either in terms of how those businesses would be expected to survive during development, or where current customers/users would go once those businesses/car parks were no longer available.

There also seems to be little attention given in the Draft Plan to how the Council have addressed the need for support services - schools, health services, transport etc - to meet the needs of new housing development, especially on green field sites. That is particularly true of any proposed development at Crews Hill, where the Plan is silent about the extent to which the thriving horticultural businesses there would be adversely impacted or perhaps driven away completely.

Comments on Specific Policies

In the light of these general comments, we are writing to object to the following policies in the Draft Plan:

- All the Policies (listed below) which propose the **de-designation of Green Belt for housing** and other purposes.
 Policy SP PL10 (ps.80-87) and Figure 3.11 re. housing development ('Chase Park') on open Green Belt countryside either side of the A110 (Enfield Road) between Oakwood and Enfield town;
 Policy SP PL9 (ps.77-80 and Concept Plan Figure 3) as regards a proposed settlement of 3,000 homes at Crews Hill, with more to come;
 Policy SA45 (p.364) regarding green belt at Hadley Wood, and between Camlet Way and Crescent Way, Hadley Wood;
 Policy SA54 (p.374) regarding development of agricultural land east of M25 Junction 24, part of new Cottages and Holly Hill Farm;
 Policy SA62 (p.383) and SP CL4 (ps.277-279) regarding development of Whitewebbs Park.
- Policies SA62 (p.383) and SP CL4 (pp.277-279) which would result in the transfer of part of **Whitewebbs Park**, a public amenity, into private management, and reduction in public access. The Council’s analysis that Whitewebbs Golf Course was losing money is flawed and the closure of the golf course was carried out without proper consultation.
- Policies relating to **tall buildings** (ps.156-160, Figure 7.3, Figure 7.4 and Policy DE6, and SA2 Palace Gardens Shopping Centre (p.321). Tall towers

are not necessary in these locations and these policies would result in buildings on a scale that would be out of keeping in their local area.

A copy of this response goes for information to all our Councillors in Chase Ward.