

Objection to – Strategic Policy SP PL9: Crews Hill.

Principle

1. **Single choice for provision of housing:** The principle of placing mass housing in the very precious Green Belt (once gone – permanently gone) is an egregious folly. That proposal only gives us, the residents of the Borough, the opportunity to comment on that particular and singular way of solving the need for housing. Therefore, it does not afford of any other solution – any solution which will preserve the green belt. The preservation of the precious Green Belt in its entirety is essential, and to profess that the new hard urban development can be melded with enhanced 'parkland' style development, is, frankly 'Green Washing' designed to obfuscate and disguise the true effect of what is proposed.
2. **Alternative solution to the housing need:** The eminently researched January 2019 report – 'Space to Build, Enfield', produced by a combination of Enfield Roadwatch + The Enfield Society + CPRE, gives lie to the draft Local Plan proposal, that the only way to meet the required housing provision is to pillage the Green Belt. That report sets out in full detail the alternative way of meeting the housing need. In fact, the construction and conclusion of that report is what the Council itself should have done. The draft local plan could, instead of presenting an almost fait accompli of injuring the Green Belt, could actually, and more sensibly and more honestly, offer the two options to the Borough's residents to decide upon: (a) trash the Green Belt or (b) use other, much less environmentally valuable land situated throughout the Borough where the requisite transport and supporting community facilities already exist. In the case of (b) above the Town & Country Planning Acts provisions for developer contribution in the form of planning gain legal agreements, would then also distribute urban renewal benefits to parts of the Borough which have no earthly prospect of getting enhancement through other means. **Thus, a double win for the Borough and the many communities within it.** This would mean – Borough -wide regeneration + satisfying the emerging housing needs.
3. **Preciousness of the Green Belt:** The Green Belt is a once only gift commanded by the Council. There are 6,000 acres, of which 4,000 are owned by the Council. How land is developed is not in the gift of a developer, it is the prerogative of the landowner – the developer follows on from the wishes of the landowner. How much of the currently proposed sites for housing are owned by the Council? Could this be another and overriding reason why the Council is anxious to only offer the Green Belt housing development solution? The other solution (b) above would not give such an easy enhancement of the Council's financial situation. The current Administration needs to seriously consider that it has this responsibility to hang on to the totality of the Green Belt in its ownership – nay, Stewardship, despite any financial difficulties it may have in its budgetary situation, current and on-going. This is not a responsibility that the Council should take lightly and presenting various green development credentials in the local plan to augment the hard built development which could be created anyway without the decimation of the green belt and wider area caused by mass housing, is not the correct approach and is, frankly inappropriate.
4. **What is the Council doing currently, either within or without the LP to reappraise its stewardship of the Green Belt land that it owns?** There should be an on-going process of its holdings in order to make them more sustainable and climate worthy. This should also be firmly incorporated in the LP and not just as a

provision of grand environmental access projects – more a grass roots approach for change in farming practices – there are very good examples nationally of radical and achievable revision of them.

Summary.

As the local plan will permanently remove large areas of the Green Belt and will set the Borough's development pattern for many years to come, and therefore have huge consequences, the principle itself should be debated, and alterable. It is not in any way appropriate to present the public with a fait accompli of one solution to the housing needs, and the draft local plan is a very inadequate document in not doing so. That is not withstanding any precursor consultations that have been carried out prior to the issue of this DLP. The Council must rethink this approach if it wants to serve residents properly and with integrity. It is absolutely not sufficient justification for the council to hide behind earlier iterations of this local plan asking for sites to be forwarded. The CPRE London+ Enfield RoadWatch + The Enfield Society January 2019 Report – 'Space to Build' gave the Council a viable and thoroughly researched and practical alternative. This has not been presented for discussion now.

Detail

1. **Food producing horticultural industries including glasshouse plant production – absolutely untrue and deliberately misleading:** The draft local plan categorises, inter alia, the area of Crews Hill as being one of 'greenhouses' and 'food production'. The inclusion in this argument that Forty Hall and Capel Manor are part of this 'food and horticultural' producing industries is actually nonsense. There is no longer any food and horticultural' producing industry in the area – that statement harks back to an earlier era. Capel manor and Forty Hall (the part of the latter which grows things) is an educational establishment to train people in horticulture and is not a 'food producing' enterprise. In addition, there are actually no glass house food producing business in the Crews Hill area. The question is – why has the LP said that there is such? This is actually and factually untrue. It therefore suggests that the author of the plan is not actually aware of the land use pattern there. This is a gross error and suggests that the Council itself is, strangely, also not aware. The historic origins of the hard land uses in that part of the countryside may have been 'glasshouse food production', but they are absolutely not so now. They consist of businesses purporting to be garden nurseries. Examination of any/all of them will easily reveal that virtually none of them grow plants on site and green material is brought in by pantechnicon, often from abroad. The other side of these uses is that they do not even display green material as their main uses. Instead of the other non-green uses being ancillary to plants, they are, in fact, the primary uses and the businesses (presumably with council approval – tacit or otherwise), the businesses are masquerading as garden centers. So, we have a plethora of absolutely unacceptable uses in the particular area – uses which are essentially non-conforming uses and should not be there at all. The list is endless – furniture; bathrooms; weddings; building materials; pet stores; etc., etc. Browns village is one of the worst offenders. At the very least, the local plan must, must correct this glaring untruth, as it is hugely and deliberately misleading.

2. **Employment potential for the new settlement:** The other misleading element presented in the local plan is that these uses will provide a substantial core of quality employment for the residents of the new housing. This is highly misleading and hypothetical and optimistic. Firstly, the positions on offer there are already filled, without the proposed 10,000 (to start) residents of the new houses. Secondly, they are mostly likely to be low-paid, gig economy jobs. The businesses are not substantial or stable and are constantly changing, again, e.g., Browns Village. They do not represent a well of employment possibilities to serve the proposed new community and they certainly do not provide community facilities. The LP allocations for the new settlement will not provide for the new jobs that will be required for the new residents as there would need to be new employment land allocated – the existing nonresidential uses in the area will be inadequate.
3. **Concomitant employment will reduce vehicular traffic generation:** The local plan seems to proffer the idea that the well of employment there will be an efficient aid to reducing car journeys as residents will not need to travel out of the new housing zone to work. Because of the above lack of variety, quality and stability of the existing business base in the area, the LP contention is highly speculative and very unlikely to achieve any of the LP objectives. The Council and the authors of the draft local plan know this to be the case and it is an unacceptably misleading conclusion.
4. **Inappropriate businesses in the Green Belt and for the ambiance of the new settlement:** Even worse than any of the above, are the really inappropriate businesses such as the scrap metal dealers + the skip business + other similar ones in the area. In doing nothing to remove these businesses, but instead ‘cementing’ them in via the local plan as acceptable designations, the Council is consigning the new residents to pretty obnoxious environmental conditions – quite inappropriately so, when it is at the same time presenting its green, environmental and urban design credentials. The Council is aware of the huge industrial land resources that it has in eastern Enfield, top to bottom of the borough – Brimsdown, etc., so, it is massively ironic that through the one initiative of the LP it chooses not to separate the future land uses in Crews Hill. Presumably the Council proposes that the employment offered by those businesses will be very good for the new residents – skip lorry drivers and scrap metal sorters! This attitude is also at odds with its heavy concentration on how pleasant the new green environment will be after being created by the LP initiatives. Parks and country walks next to skip businesses and scrap metal uses! Oh please; Really?
5. **Creation of new ‘green environmental facilities’:** The overriding point is that if one wants to promote parks and green environmental uses, don’t try and use new housing within them as a cover for creating them – do it anyway, do it now – the Council is in the unique position of owning the land – it can do whatever it wants without reference to any other Authority.
6. **Social housing provision:** It is an abiding truth of the developer relationship with the planning system, that social housing will not be top of their agenda to facilitate, it will be their top priority to resist it as much as possible. The LP policies must be as strong as it can possibly be to (a) give a robust base to oppose developer opposition to social housing and (b) make realistic contributions to the provision of social housing and new green facilities. Also, Enfield Council has been quite entrepreneurial in building its own housing schemes – how much of that will infiltrate the LP policies in Crews Hill? After all

the Council own much of the land and could purchase other parts in a similar entrepreneurial way and side-step grudging developer attitudes. Does the LP consider that in any effective way?

7. **Clay Hill road system – destruction of:** The Clay Hill Conservation area is downstream from the proposed new housing development at Crews Hill. The Council purport to think that this is an important local environment, to the extent that development control and planning policy makes a great fuss over the type of replacement front doors, etc. – minor details, so much so that it has imposed an Article 4 Direction to control the development in the conservation area. **It is already a fact that the Council knows how busy and difficult the road system through the conservation area is, and even acknowledges that the extra vehicle traffic will have to come through it. So, some 3,000 (minimum starting level) extra domestic cars will be routed through the conservation area along with all of the extra commercial traffic that will be required. This extra traffic will destroy the ambience of the conservation area totally and the lives of the residents lining the route. The LP is very quiet on how the existing road pattern will be remediated to prevent that situation. Para. 3.9.3 of the LP states that: ‘Road access to the area is of limited capacity – how will this capacity issue be addressed – the LP is virtually silent on the issue.**
8. **Folly of the notion that new settlements can be created in an area which is not already well served with the necessary infrastructure:** The development of the Enfield Island site for housing should have taught the Council that such an isolated settlement as the proposed Crews Hill housing area will never get the euphemistically promised community facilities that it would need, despite the contention that it would only get permission after the production of a Master Plan as SPD. Developers don’t do that kind of thing and the council and other organisations don’t do so now either. So, the housing development will become a desert site with a great need to drive to the necessary community facilities. The presence of the railway station and the bus service will not be sufficient to supply the necessary transport links/conduits to any necessary facilities.
9. **Reduction of vehicular use – electric cars:** On the subject of car use, the LP seems to be putting a lot of store in electric cars as proving the necessary reduction in pollution from the new housing. There is no evidence that car journeys will be reduced by the emergence of the mass adoption of electric cars. Users will think that the global warming problem has been solved and therefore it will be fine to drive as much as one wants.
10. **Be sensible and bold – don’t reach for the worst solution just because it seems easier:** The alternative Borough-wide brownfield sites approach would remove problems that the current proposal is going to create. The LP will be creating new problems in the Crews Hill area to solve the housing problems said to exist in the Borough. The answer is to cure the real problem in a sustainable way – don’t set off on a course destined to be hugely destructive and then walk away from the avoidable debris. Returning to the development in principle comments above, if the LP did return to the borough-wide distribution/dispersal of new housing allocations, then all the above negative issues would disappear.

Summary.

The many detailed issues flowing from any decision to create a new settlement at Crews hill will not be able to be resolved satisfactorily and, in truth, what would actually happen is that the developers would only be

interested in building housing and any other necessary community facilities would not follow from that interest – they would be resisted. This is standard developer's practice. This particularly includes transport – the presence of the railway station and a bus service would not fulfil any substantive access needs. The Council would be totally impotent to provide any proper access from the new settlement to Enfield town or elsewhere and the certain result will be an exponential increase in vehicular traffic using the existing and inadequate route through Clay Hill. The abiding need, because of climate change imperatives, to reduce road traffic, should be the uppermost priority of the Council – the installation of so much new traffic generation in Crews Hill will do exactly the opposite.