ENFIELD Council	**Enfield Local Plan 2019-2041** Regulation 19 Consultation Stage Representation Form	**Our Ref:** **(For official use only)**

Enfield Local Plan Regulation 19 Consultation	Public response form

Please return this form in .docx format to London Borough of Enfield by emailing to localplan@enfield.gov.uk by 11:59pm 20 May 2024. Please do not include pdfs.

This form has two parts
Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. *Please do not include any personal details on this sheet as this will invalidate your response.*

Part A: Personal Details

1. Personal Details*	**Trent Park Residents' Association**		2. Agent's Details (if applicable)
***Please note:** your name and response will be made publicly available but not your other personal details. This is in line with GDPR legislation and is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. Please note that if you do not submit contact details your representation will not be able to be considered by the Inspector.*			**If an agent is appointed, please complete only the Title, Name and Organisation in the boxes below but complete the full contact details of the agent in 2. Please submit in .docx format rather than PDF.*
First Name	Colin		Click or tap here to enter text.
Last Name	Malone		Click or tap here to enter text.
Job Title (where relevant)			Click or tap here to enter text.
Organisation (where relevant)			Click or tap here to enter text.
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Please note this form must be submitted as an MS Word document rather than a PDF.

Part B: Please use a separate sheet for each representation

2. Full Name or Organisation:

Trent Park Residents' Association

PLEASE NOTE: *DO NOT INCLUDE OTHER PERSONAL DETAILS SUCH AS YOUR ADDRESS OR OTHER IDENTIFICAITON IN THE SECTIONS BELOW OR YOUR RESPONSE WILL BE INVALID*

3. To which part of the Local Plan does this representation relate?
PLEASE NOTE: *THIS QUESTION IS REQUIRED AND SHOULD BE ANSWERED FOR EACH SEPARATE SHEET PROVIDED.*

Policy number e.g. TC3	*PL10*	**Paragraph number in policy**	Click or tap here to enter text.	**Site allocation reference e.g. SA1.1**	Click or tap here to enter text.

or please mark x instead if your response is not specific / relates to the whole plan. ☐

4. Do you consider the Local Plan is: ***please mark your response marking x in a box***

4.(A) Legally compliant	Yes	☐	No	☒
4.(B) Sound	Yes	☐	No	☒

5. Please give details of why you consider the Local Plan is not compliant with relevant legislation, or does not meet the tests of soundness set out in the NPPF, or fails to comply with the duty to co-operate. Please be as precise as possible making reference to specific aspects of the plan and relevant legislation and policy.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.
Please note this section must be submitted as an MS Word document rather than a PDF.

Legal compliance-

Objections

Trent Park Residents Association objects to the proposed developments at Vicarage Farm and the Trent Park Equestrian Centre because they are not 'sound' or in general conformity with the London Plan. We will demonstrate why the proposals for 'Chase Park' should be deleted from the Local Plan.

1. **A much-valued landscape**

Trent Country Park sits within the wider area of Enfield's Green Belt, all of which was part of the historic Enfield Chase. In particular, Vicarage Farm to the southeast and south of the park provides a historic setting for the listed park and gardens, allowing

long views to Enfield and Epping Forest and giving an idea of the extensiveness of the original Chase.

Policy PL9: Rural Enfield states the following: "1. New development should be designed to sensitively integrate physically and visually with Enfield Chase and the Lee Valley Regional Park, particularly in relation to open skylines, key entrance points, strategic views and valued landscapes." (page 85) The Chase Park proposals fail on all these measures: the key entrance points at Lakeside/Enfield Road, Fairview Road, Camp Road and Trentwood Side will all lose their special qualities; strategic views will be lost; and the rural background to long distance views will be lost. All of these are important to local residents and visitors making Vicarage Farm a valued landscape and, as such, protected by paragraph 180a of the NPPF and Policy GG1 of the London Plan.

2. **Trent Country Park in relation to the historic Enfield Chase**

Part 12h of the Policy PL10 states the following: "To realise the placemaking vision, development at Chase Park must demonstrate how it will contribute to make a good place in line with policy SPSS2: Making good places. This includes how it will…. respect the significance and setting of Trent Park and surrounding designated assets, the conservation area parkland and adjoining woodland, including Williams Wood and Shaws Wood."

The proposed Chase Park development will do the exact opposite of respecting the significance and setting of Trent Park. The view across the Merryhills Brook Valley/ Vicarage Farm is the only remaining visual connection between the park and the former Chase and the significance and setting would both be lost if Vicarage Farm were developed.

3. **Impact on the park's pedestrian gateways**

For residents and visitors alike walking into and around the park is a much-valued experience. The popular Merryhills Way and Lakeside gateways currently provide a countryside experience, following streams and with views of fields, paddocks and woods. They would both be urbanised, making their use much less appealing and encouraging car access instead to the car parks off Cockfosters Road and Hadley Road.

4. **Unsustainable**

As residents we have first-hand experience of living on former Enfield Chase land [adjacent to the proposed Chase Park site on Vicarage Farm] and we can attest to the fact that it is hard to manage without a car because of the topography and distance to public transport. In fact, its PTAL is 0 and our development was planned with a comparatively high London ratio of car parking – 1.85 per dwelling. Along with the promotion of walking and cycling paths, sales material highlighted driving distances to the M25 and Heathrow. [A ' 14 minute drive to M25 J24; 35 minutes to Heathrow Airport by car'.] Mitigation efforts to reduce car use have been largely ineffective. The car club consists of one car and is rarely used. The shuttle to Oakwood operates on a limited schedule. As a result, there is a common feeling that there is inadequate parking provision on site, especially for families.

5. Loss of tranquillity

In recent years, and especially since the Covid epidemic, the number of visitors to Trent Country Park has increased significantly. The park is a regional attraction so the majority of visitors arrive by car and park at the Cockfosters Car Park or the secondary car park at Hadley Road. The western end of the park contains the Cockfosters Car Park, Go Ape, the café and toilet block, with large numbers of people walking along Limes Avenue to the Mansion and back, and significant numbers continuing on to the lakes, Water Garden and up to the obelisk. In addition, the number of residents in our Berkeley Homes development continues to increase, further adding to footfall in the park.

However, at 413 acres, Trent Country Park can still offer some rural tranquillity away from the crowds and most-used areas. Williams Wood lies away from car parks and main footpaths, adjacent to Vicarage Farm. There are few areas in London that are perfectly tranquil but Williams Wood comes close with birdsong very noticeable.

National Planning Policy Framework 185 is relevant here. It states that:

Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:…..
b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;

Williams Wood forms part of the Metropolitan Site of Importance for Nature Conservation (SINC) and, as such, is afforded the highest levels of protection within London. A habitat survey by the Friends of Trent Country Park demonstrated that recreational pressure on much of the Trent Country Park SINC is becomingly increasingly intense, particularly within easy walking distance of the main public car parks at Hadley Road and Cockfosters Road. This makes Williams Wood and Shaws Wood even more important and critical parts of the Metropolitan SINC. The proposed development on Vicarage Farm immediately adjacent to the Woods would harm the habitats and jeopardise the current tranquillity.

6. Harm to the natural environment

Here we will share the information submitted by the Friends of Trent Country Park and the Trent Park Conservation Committee, drawing on the same information and objections.

London Plan Policy G6: Biodiversity and access to nature

A Sites of Importance for Nature Conservation (SINCs) should be protected.

B Boroughs, in developing Development Plans, should:

1. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks

2. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
3. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans

C Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

1. avoid damaging the significant ecological features of the site
2. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
3. deliver off-site compensation of better biodiversity value.

In 2017 the Friends of Trent Country Park commissioned a qualified ecologist to carry out a Habitat Survey of Trent Country Park which has since been used by Enfield Council as a guide to habitat management. In September 2023 the Friends commissioned the same ecologist, as being very familiar with the area, to do an ecological appraisal of Vicarage Farm. The ecologist appraised the proposals for Chase Park as contained within the December 2023 Pre-Publication draft of the Regulation 19 Local Plan.

We will focus on his headline findings as they relate to Trent Country Park:

Ecological Appraisal of Vicarage Farm (Denis J Vickers)
Conclusions (pages 41-2)
a) "This report views the development the Chase Park Placemaking Area as inappropriate and contrary to conserving biodiversity in Enfield and maintaining the quality of its landscape.

h) The type and level of public activity expected at Trent Country Park (particularly the eastern end near the CPPA) and Royal Enfield Rifles and Woodland at Vicarage Farm, would be elevated. The overall impact would be negative, moderate but ongoing. Dog walking is likely to be the most popular pursuit. Dog faeces and urine will lead to soil eutrophication and the growth of vigorous nitrophilous / phosphophilous plants to the detriment of slower growing species. The increase in use of the site by people, dogs and cats (from surrounding properties) would, without doubt, result in the disturbance of wild birds, mammals and some invertebrates. This would be particularly disruptive during the breeding season (spring-early summer). The proximity of housing, improved access and increased footfall would be highly likely to result in significant trampling, giving rise to soil compaction and vegetation erosion. Consequently, less vigorous species of plant would likely give way to trample resistant types (generally of lower conservation value). Occasional fire-setting is likely to take place in more vulnerable areas of grassland and scrub. Such habitats may recover relatively quickly although the fauna they support may not. A certain degree of vandalism could be expected with respects open space infrastructure such as fencing,

signage and heritage interpretation."
This would not be in general conformity with London Plan Policy G6A.

7. **Trent Park Equestrian Centre**

Horse-riding has been an integral part of the area since Medieval times and earlier when it was a hunting chase. Although equestrian facilities exist on Hadley Road, they are currently only livery services and not accessible by public transport. The loss of Trent Park Equestrian Centre would break the equestrian connection to the past for the public and diminish the setting of the listed park in yet another way.

The equestrian centre is a thriving business, drawing riders of all levels from near and far because of its proximity to Oakwood Station. It is one of few equestrian centres so accessible by public transport. It is especially important for grassroots activity, encouraging beginners to try out the sport and its loss would diminish the country's standing in the sport. Also, horses assist with mental health and disabilities and this beneficial aspect would be lost to the area.

Conclusions

The residents of Trent Country Park, represented by the Trent Park Residents Association, are more than happy to share the park with visitors from near and far but we have serious concerns that the proposed Chase Park development would:

1. remove a much-valued landscape that provides the listed park with its historic setting
2. Discourage active travel into the park by urbanising the pedestrian gateways
3. Be unsustainable
4. Destroy the park's tranquillity and
5. Harm the natural environment

(please continue on a separate sheet /expand box if necessary)

Please note this form must be submitted as an MS Word document rather than a PDF.

6. **Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.**

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note this section must be submitted as an MS Word document rather than a PDF.

Modifications-

The policy is not sound and should be removed from the Local Plan.

(Continue on a separate sheet /expand box if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please mark your response marking x in a box

☒	**No**, I do not wish to participate in hearing session(s)	☐	**Yes**, I wish to participate in hearing session(s)

Please note: that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note this section must be submitted as an MS Word document rather than a PDF.

Hearing sessions-

Click or tap here to enter text.

Please note: *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*