



To Whom It May Concern:

Response to the Blue & Green Strategy Consultation 2020 – Appendix to online survey

Enfield RoadWatch thanks you for the opportunity to respond to the Blue and Green Strategy Consultation. We have completed the survey referring you to this more detailed document. This submission represents the views of Enfield RoadWatch and our 1,200+ supporters, some of whom may also submit individually. Our comments are qualitative and expand on the quantitative responses in the survey, which does not allow sufficient room for full feedback.

In general the Blue and Green Strategy appears ambitious with some good goals. Nevertheless, on close reading there are some major issues with the overall strategy and with specific content.

In its present form, the ‘strategy’ is more of a presentation about parks and open spaces than a true strategy for the long-term preservation and enhancement of all the borough’s public and private green and blue assets and the impact of that strategy on the climate crisis. In fact, no long-term strategy is laid out, other than the desire to be the greenest borough.

In terms of the specific content, the devil is in the detail and what is not included. Our comments below fall into 10 areas of concern:

1. **Food Production** – The consultation home page includes ‘sustainable food production’ as one of the ten goals of the strategy but the strategy then includes food production only as a small-scale activity to encourage outdoor exercise and social interaction. Apart from brief mentions under Strengths [p26] and Opportunities [p27] there is no mention of commercial food-production, historically, now or in the future, on public or private farms or at Crews Hill. This aspect of the strategy needs to be expanded with input from the many organisations dedicated to sustainable farming. These include local experts such as those at Forty Hall Farm, Capel Manor and Organic Lea and national organisations such as CPRE and The Nature Friendly Farming Network.

2. **Farmland and Agriculture** – Enfield’s farmland is written off as poor quality without any source evidence. Experts now consider the ALC system as outdated and that agricultural land value should factor in more modern ways of evaluating soil, such as its organic structure and soil biology. Apart from a brief mention under Opportunities [p27] there is no apparent ambition for any of the public or private farms to be worked commercially or used as model sites for sustainable farming practices. All the council farms seem designated for woods or parkland. It is implied that the tenant farmers are all in agreement with this move. However, the Audit does not even look at the Council’s farms. There is no policy to work with private landowners [Vicarage Farm, etc.] although much of the private farmland is included in woodland and/or habitat expansion zones and the North-South B-line. An appendix should be added to the strategy document listing the farms in the borough, how they are currently used and what opportunities they offer for sustainable farming, agroforestry and other climate-friendly purposes.
3. **Crews Hill** is not mentioned, even historically as a centre for horticulture, and in the maps appears to have been removed from the Green Belt. Given the need for food security and a reduction in ‘food miles’ the strategy should include a vision to reinstate Crews Hill as a centre for local food and horticulture production.
4. **Expert Advice** – The Council has been without a Biodiversity Officer for some time and what environmental expertise remains is scattered in different departments. The documents talk about working with ‘practitioners and academics’ [P14] but list only two organisations and no other source material is referenced. It is hard to accept conclusions [for example, the quality of local soil] without knowing the source of the information. Please see item 2 for some suggested expertise, but there are many more.
5. **The emphasis on ‘fairer distribution’ and equality** is positive unless in practice it means levelling down across the borough. References to no net loss of green space and the possibility of selling council land to developers and agencies suggest taking green space away from the west to fund projects in the east, which would not be acceptable. A more detailed focus on greening the east of the borough is needed in the strategy with specific projects and timelines. There is a lot of green space on the eastern side of the borough and there are some simple solutions for linking to Epping Forest and the Lee Valley, which should be listed and targeted. There should also be an exploration of innovative ideas such as Tiny Forests in the east. And there should be a project to introduce water sports in the east of the borough.
6. **Events** in the parks have become a very controversial issue, especially very large-scale events such as Elrow in Trent Park, which caused havoc locally and probably

made very little money for the Council. It is hard to support this goal as part of the strategy without a better definition of the type, size and location of the proposed future events and a definition of terms like 'active management' of parks. Given the importance of the borough's parks and green spaces during this Covid year, it is to be hoped that any events will have public health and welfare and protection of our environmental assets as primary factors.

7. **Increased community engagement** – The consultation documents call for more public engagement in decision-making and design. A commitment to this goal written into the strategy would be welcomed. There is a wish list of projects, such as Enfield Sports Village, with no evidence that local stakeholders have been consulted. Community input seems to be lacking in general.
8. **Omissions** – While the overall strategy is wide-ranging and complex, there are many omissions, including:
 - a vision for Enfield's farms
 - a policy about front and rear gardens to prevent permeable green space and habitat being lost
 - a policy for the management of verges to benefit biodiversity
 - a commitment to introduce new footpaths [the Green Loop uses existing paths] and to register all footpaths in the borough by the 2026 deadline.
9. **Funding** - We have concerns that reliance on development fees and levies to fund the projects and relevant staffing will result in the de-designation of some Green Belt sites for development and Green Belt swaps from west to east, despite protection in the new London Plan.
10. **Borough-wide strategy projects** – All the projects are important, subject to appropriate local stakeholder consultation. However, initial funding and design and long-term maintenance could be an issue with most of them, especially given the Council's reduced staffing and expertise in certain areas.

With regard to **Enfield Chase Restoration**, it is an eye-catching project for the many and varied benefits it will bring, but it will require long-term management, which cannot come only from volunteers. The Council's parks staff are already stretched to maintain the existing portfolio of parks and open spaces and have been unable to keep up with habitat maintenance, such as that recommended in the Trent Country Park Habitat Survey 2017. They will need full-time experts added to their roster. As mentioned in item 2, it appears that most of the Council's farms are designated as future parkland as part of the Chase Restoration project. More information is needed about this plan – for instance, given the latest research about the importance of natural forest regeneration for carbon sequestration, will these areas

be re-wilded and allowed to regenerate naturally? What scientific expertise will be brought in to oversee the project long-term and keep up with scientific advances?

Finally a few comments about the **supporting appendices**: -

The **Biodiversity Action Plan Review** looks rigorous with some solid criticisms [such as data collection and sharing, maintenance, in-house expertise, etc.] and detailed guidance for future management and policy.

The **Blue and Green Infrastructure Audit** looks thorough except for the complete omission of the Council's farms or any overview of privately-owned farmland.

The **SINC Review** recommends the status quo with a couple of additions and appears sound.

We will look forward to a final strategy that incorporates our suggestions.

Regards

Ian D'Souza

Chair

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