



Green Belt for the Community

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 Enfield RoadWatch www.enfieldroadwatch.co.uk, a local action group dedicated to the continued preservation and enhancement of the Green Belt in Enfield and elsewhere. Our supporter base comprises over 1,200 people with access to thousands more via our Change.org petition, which now numbers over 34,300 signatures. The petition supporters come from all over the UK demonstrating the importance of this issue and the depth of feeling in the community. We work in collaboration with numerous local and national organisations whose goals with regard to the Green Belt align with our own.

This is our formal response to the Enfield's draft Local Plan 2039 under section 18 regulations which we will follow up at later stages of the process. We have previously submitted to the Regulation 18 Issues and Options consultation, the Blue and Green Strategy consultation, the Local Plan Vision Survey and others.

We maintain that **all** the sites in Enfield's Green Belt satisfy at least one of the five purposes of the Green Belt – usually more than one – and that the protection provided by the London Plan and NPPF should therefore be sufficient to retain the boundaries at the 2013 level. We also maintain that there are no exceptional circumstances present to allow for those protections to be removed at this time because there are clear alternatives on brownfield sites that have yet to be sufficiently explored or taken into account.

We are not against development and recognise the need for new homes, but there are other ways Enfield can deliver those goals and they should be exhausted before Green Belt development is even considered.



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We believe that the Green Belt is too important to lose because of the many benefits it provides towards health and well-being, environmental purposes such as controlling flooding, maintaining biodiversity and, in particular, helping to fight climate change, providing local food and local jobs, and diverse other benefits.

Our response will explore these statements in more detail.

2. CONTESTED STRATEGIC POLICIES – PL10, PL9, SA54, SA45, SA62, SS1, PL8, BG3, DEG, SA2, DM BG10, DMRE1, DMRE2

Strategic Policy PL10: Chase Park.

The farmland bordering Enfield Road is the finest countryside in the borough. The views of rolling topography, hedgerows, copses and long-distance vistas that appear as you leave the urban setting of Enfield and Oakwood behind are described by many as ‘a breath of fresh air’. The character and identity of western Enfield derive in very large part from the openness and countryside character of this land.

Suburban development in West Enfield in the 1930s reflected the openness and greenery around it. Even the houses of the Laing Estate [Lonsdale Drive, Merryhills Drive, Lowther Drive and the cross streets] were deliberately designed in the 1930s to reflect a countryside setting, with ample greenery, wide verges and mature trees in many gardens.

The proposed development on either side of the road would mean that the sense of separation between Oakwood and Enfield Town would be lost. The photograph below is taken looking west with south of Enfield Road on the left and Vicarage Farm on the right. The green corridor of Enfield Road is clearly shown and the contribution made by land on both sides of the road is very clear. Development on either side of the road would entail the loss of that distinctive character.



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In contrast the Council states in *Character Responsive to Context 4* that the existing townscape should only be ‘acknowledged’ and densities increased on the Chase Park development. *The design of new development should acknowledge the townscape of the 1930’s residential context but make more efficient use of land with a higher density, sustainable urban form which reflects its suburban location.*

Are these increased densities really appropriate in a countryside environment? We even question whether the ‘Place-Making’ for Chase Park is really place-making at all as it appears to have no reference to the special qualities of Enfield at all.

The Green Belt sites designated for Chase Park are strategically important. The Green Belt assessment commissioned by LBE states that release of much of this land would cause major harm to adjacent Green Belt. Green Belt purpose 3 - **To assist in safeguarding the countryside from encroachment** – is of particular importance here. The Green Belt study is unable to indicate any ways in which the harm could be mitigated in terms of design and layout. Far from being an ‘urban fringe’ development, the proposed development would be in actual countryside i.e. it would be in sharp contrast with the built-up areas. Green Belt purpose 4 – **To preserve the setting and character of historic towns** – is also very relevant. Local residents moving through the corridor on the bus, walking, cycling or driving find that experiencing the presence of the countryside on both sides is key to their identity and sense of place. This would be lost if the separation between Oakwood and Enfield Town disappears.



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We also note that the Chase Park area has been assessed in different sections that appear to have been artificially created, given that the land is under single ownership and that the entirety of the area is important for the integrity and coherence of historic Enfield Chase.

This land also makes an important contribution to the setting of Trent Country Park Registered Historic Park, which would be lost.

The Merryhills Way (a popular Public Right of Way from the Ridgeway to Trent Park) would be transformed from a unique countryside experience to a walk along an urban path between buildings. The Merryhills Way currently provides an outdoor opportunity for residents living in an area of deficiency in access to nature, Highlands Ward being one of only two with no park. We refer you to The Enfield Society survey of users on the Merryhills Way, which demonstrates the large number of users and the variety of activities documented in a single random day.

Far from being 'deeply green' and a 'sustainable urban extension' as described in the plan, the proposed development would see infrastructure including roads, foul sewage, surface water run-off, footways etc. replacing countryside farmland that sustains a wide range of resident and migrating birds and insects, in addition to other fauna and flora.

The farmland, it should be noted, was actively farmed until only a few years ago, most recently growing rapeseed, and could again contribute to Enfield's local food and local jobs. A recent report by Professor Jules Pretty of the University of Essex, *The Good Life and Low Carbon Living*, shows that eating local food helps to reduce an individual's annual carbon footprint more than planting ten trees. Surely a Council which has declared a climate emergency should be taking this data into account before destroying agricultural land?

Additionally, the proposed development would cause a large increase in traffic and related congestion, especially at Oakwood and at the Slades Hill/Windmill Hill junction with resultant pollution.

We suggest a better use for this land in all ways would be for it to be farmed and for it to be incorporated into Trent Country Park allowing for increased public access and the sustainable growing of local food.

Strategic Policy PL9: Crews Hill.

The proposed large-scale development in this area – described as a 'gateway settlement' - is in effect sprawl. The area has an open rural character and the current greenhouse uses are operating lawfully and are complimentary to that character. [Deviations from appropriate Green Belt activities are due to lack of enforcement, which should be improved]



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Despite the station, most travel would be car-dependent rendering it an unsustainable proposal. The added traffic would result in severe congestion at Botany Bay, Bulls Cross and Clay Hill and would severely harm the rural character of Whitewebbs Lane, East Lodge Lane and the Conservation Areas at Forty Hill and Clay Hill. Development of Crews Hill Golf Course – a successful golf club with a noted historic course - would remove opportunities for outdoor recreation and a place to experience far-reaching views across Enfield Chase.

Despite nominal attention to ‘food-growing areas’, development at Crews Hill would remove another opportunity to grow local food for local people. [See our earlier comments] It would also displace many small and large businesses, some supporting multiple generations, and overall employing a large number of people.

These businesses draw visitors from all over London and beyond, providing social value to the community. People visit with their relatives, children and friends. The access to plants and growing and gardening supplies provide mental health benefits in a friendly outdoor environment. All this is demonstrated in a two-day weekend survey conducted by Enfield RoadWatch over Bank Holiday weekend in August 2021.

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]



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Crews Hill is a distinct local asset and a tourist destination and it makes no sense to replace it with homes which, according to the plan, would create a gateway to a new tourist attraction – the disputed Enfield Chase National Park City location.

SA54 (Land East of Junction 24) would remove the green gateway to Enfield Chase and change it into a motorway interchange experience with traffic implications on the A111 and A1005 that would be hard to mitigate.

SA45 (Land Between Camlet Way and Crescent Way, Hadley Wood) would represent more sprawl into attractive open countryside.

SA62 [Land at Tottenham Hotspurs Football Club Training Ground]

We object to the allocation of 42.5 hectares of Green Belt for “professional sport, recreation and community sports/leisure uses” At present the Whitewebbs Golf course is open land, well-used and enjoyed by the public for outdoor recreation. We also have concerns that fencing off portions of this site would impact the openness of the Green Belt. The existing Spurs facility already includes a number of inappropriate built structures in the Green Belt and there appears to be potential for more inappropriate structures on the former Whitewebbs Golf Course.

Strategic Policy SS1: The Spatial Strategy.

This policy protects Strategic Industrial Land at the cost of Enfield’s Green Belt and historic landscapes such as Enfield Chase which are integral to the history and character of the borough.

While we question the housing target [see below], we believe Medium Growth Option 2 better serves the needs and future of the borough and that the pros and cons have been manipulated to produce the result favoured by the Council. The Council’s assessment of the options is technically flawed but a political decision has been made to proceed with the Green Belt option, which fails to take into account or even address the level of local objection in the previous Issues and Options responses and in the pre-2018 consultation, where 82% of respondents did not want to build on the Green Belt.

Insufficient effort has been made to drive better use of brownfield land (of which Enfield has huge areas that are operating highly inefficiently). The case for exceptional circumstances and using Green Belt as the preferred option is technically flawed.



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We also have concerns about part 2 of this policy and object to parts 7, 8, 9, and 11 relating respectively to Chase Park, Crews Hill, warehousing in the Green Belt east of Junction 24 of the M25 of the Ridgeway, and housing in the Green Belt at Hadley Wood.

Strategic Policy PL8: Rural Enfield – leading destination in the London National Park City.

This policy justifies the loss of large parts of the most beautiful and strategically important Green Belt countryside by proposing ‘improvements’ elsewhere on the Green Belt paid for by development. The Green Belt is not there to be ‘traded’. If the Council is serious about being ‘deeply green’ the entire Green Belt would be protected and enhanced.

The proposed improvements would make marginal difference to the rural area and would in no way compensate for the loss of beautiful open, historic countryside that is valued so highly by residents.

The plan would also remove commercial food-growing as a viable option and would fail to compensate for the Major Harm inflicted by development on the targeted Green Belt sites.

We believe that the policy misappropriates and misrepresents the ‘National Park City’ concept to justify dedesignation of Green Belt and harmful development and are aware that the National Park City Foundation has been very critical of the attempt to justify development in the countryside by reference to the National Park City concept.

The ‘rewilding’ of Enfield Chase ignores the fact that the Green Belt areas targeted for development are equally parts of historic Enfield Chase and are irreplaceable. While improving access to the countryside is a laudable goal, this policy appears to treat Enfield’s Green Belt as a countryside theme park, rather than a functional eco-system, with a patchwork of habitats that are vital for wildlife and the potential to once again provide local food for local people.

Strategic Policy BG3: Biodiversity Net Gain, rewilding and offsetting.

We are concerned that this policy is being used to justify development that would be highly damaging to the environment. There are irreplaceable priority habitats within Enfield Chase lying within a non-recreatable historic setting. Development would destroy or fragment these important assets. No amount of developer contributions to ‘rewilding’ or offsetting can compensate for damage to these aspects of the countryside. Also Vicarage Farm is located on the Buglife B-line (part 3c of the policy) and should be protected, rather than destroyed by development in an area great for wildlife, insects and birds.



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Policy DEG: Tall Buildings. We include this policy because tall buildings are being played off against the Green Belt in plan documents and information sessions. We dispute the contention that it is necessary to either build up or to build further out or that inappropriate tall buildings will spring up if the proposed plan does not pass. The Council decides where tall buildings may be built and how high they can be. The Council also admits that alternative building forms, such as mid-rise mansion blocks, can achieve a similar number of homes as tower blocks. *7.6.4 For instance, mansion blocks, terraces or stacked maisonettes can achieve the same number of homes or floor space without excess height. These buildings can offer advantages in terms of better amenity and less costly maintenance.*

Policy SA2: Palace Gardens Shopping Centre. 350 dwellings on this site would require buildings much too tall for the Conservation Area. The visual impact on the character of the Conservation Area would be very harmful and it would have an adverse impact on the setting of many listed buildings as well as the Town Park.

Policy DM BG10 Burial and Crematorium Spaces. We object to the use of Metropolitan Open Land [MOL] for new crematoria, specifically SA58 Alma Road Open Space, SA59 Firs Farm Recreation Ground (part) and SA61 Church Street recreation ground. These sites are too important to the health and well-being of Enfield residents and are afforded the same level of protection as Green Belt.

Policy DM RE1: Character of the Green Belt and Countryside. Paragraph 11.1.2 suggests that this policy is about 'compensation' for harmful developments such as Chase Park. It is not possible to compensate for the irreplaceable wildlife and heritage benefits of Enfield Chase at Vicarage Farm. The justification is hollow and we object to this policy and the way in which it is presented.

Policy DM RE2: Improving access to the countryside and green corridors. Part 1d refers to 'important viewing points'. Many of the most important 'viewing points' in the Green Belt are visible from the Merryhills Way at Vicarage Farm. The Merryhills Way is close to local people and is highly valued for the physical and mental health benefits it provides, principally because of the openness of the landscape. This policy, like the proposal for destruction of the countryside at Chase Park (PL10) fails to recognise that. We note that Enfield Golf Course is shown as a green corridor on the Proposals Map and suspect that the Council intends that this route would somehow compensate for harm to the Merryhills Way caused by development at Vicarage Farm, given the poor access to open space for residents in the area. We question the safety of allowing pedestrians to cross the fairways on the golf course.



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3. THE IMPORTANCE OF THE GREEN BELT AND GREEN SPACES

The stated purposes of Green Belts are:

- To prevent unrestricted urban sprawl
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of urban land

London's Green Belt was put in place primarily to stop London sprawling into the surrounding countryside. Without it continuous development around London would likely now extend from Brighton to Cambridge. The proposed development on Enfield's Green Belt would not be 'deeply green' or a 'gateway settlement'. It would be sprawl, plain and simple. **Urban sprawl** comes with multiple economic costs, including increased travel costs; decreased economic vitality of urban centres; increased tax burdens due to more expensive road and utility construction and maintenance; increased car use leading to higher air pollution and increased health care costs for diseases like asthma, and loss of productive farmland and natural lands that support tourism.

Recreation, sport, health – Enfield's Green Belt has played a vital role during the ongoing epidemic, allowing residents and others to enjoy open land and countryside. Science and medicine have now proved that access to peaceful green spaces reduces stress and mitigates some physical conditions. Removing up to 10% of the borough's Green Belt and replacing it with thousands of homes and related infrastructure would not only remove many hectares from these valuable roles but also increase load on the remaining green areas and reduce their health benefits as well.

Eco-system benefits and Climate Change – Enfield's Green Belt is made up of different types of open land providing multiple eco-system benefits. These include urban cooling, improved air quality, flood protection and carbon absorption (especially the woodland areas), as well as local food production. The natural capital of these functions should be valued more highly in the plan as they play an important role in fighting climate change.

Agriculture – Enfield's Green Belt farms are a vital economic resource for food security and soil protection. The proposed plan makes only nominal mention of 'food growing areas' when agriculture should be considered an important land-use and a job creator and a tool in fighting climate change.

The Draft Local Plan is clearly out of alignment with the London Plan and the National Planning Policy Framework with respect to delivering housing on the Green Belt. In fact, the London Plan



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places the utmost importance on the protection of the Green Belt and the Mayor also has a strong commitment to protect the Green Belt.

We are disappointed that the draft plan presents unnecessary stark choices between building on the Green Belt or skyscrapers, building on the Green Belt or rampant uncontrolled development, building on the Green Belt or government control. Instead it should present a creative vision for a borough that is made greener, cleaner and healthier for all residents by embracing and working with nature and the environment. This is no longer a luxury but an absolute necessity given the possible calamity of climate change. The vision should start with protecting and improving the environment including all the borough's existing green spaces and then creative green solutions employed to meet housing, employment, community, health and other needs.

4. MEETING HOUSING NEED

Please apply these comments to Chapter 2

Enfield RoadWatch recognises the housing crisis and the pressure for additional homes and we support the development of well-designed homes in appropriate locations. However, the Plan relies heavily on the London Plan requirement for 1,246 dwellings per annum whereas the demographic 'need' for housing growth is relatively small - 678 per year compared to a target of 1,246 for total need. The issue is the backlog in demand and need for affordable housing. The draft Local Plan is "designed to create homes for future generations" when its primary purpose should be to meet **current** housing needs, especially those of the most disadvantaged families in Enfield who are without homes.

Enfield Council's Draft Local Plan proposes 25,000 new homes over 20 years to 2039 - with 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 and the Council "commits to delivering 50% of new homes as genuinely affordable to rent or to buy – to meet Enfield's needs".

We query the soundness of the Council's housing figures. Housing targets should be based on an assessment of both housing needs and housing land availability. The Council has assumed potential capacity in Green Belt sites without giving appropriate material weight to the Green Belt designations as a constraint. This should be reassessed with an emphasis on unlocking the capacity of brownfield sites.

The case has not been made for needing 25,000 homes. Population growth forecasts are very uncertain after Brexit, Covid and Levelling-up policies. SP SS1 is proposing a 20% increase in the number of households in Enfield, four times the population growth forecasted nationally by the ONS. The Local Plan needs to look forwards not at outdated statistics. Removing the development



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planned on the Green Belt would allow for circa 18,000 homes to be built over the plan period, which still represents a 14% growth increase over the plan period.

Homes built on the London Green Belt are rarely affordable [by any definition of the word] and those that are nominally affordable are actually shared ownership. Shared ownership requires a deposit of at least £6,000 and annual incomes of £56,000 - £90,000 + solicitor fees. Also the figure of 50% is a goal not an absolute. The Whole Plan Viability Assessment says 'up to 50%' but that figure is followed by caveats and does not include infrastructure costs.

The implication that the proposed Local Plan will increase the delivery of affordable housing is misleading especially to low income families and those in temporary accommodation.

The majority of homes built on Crews Hill and Vicarage Farm would not be affordable and would be unlikely to support many of the low income families in temporary accommodation, as demonstrated by the recent development at Trent Park.

The plan should focus first on providing truly affordable homes for the 4,500+ residents on the housing needs register on sites such as Meridian Water and estate regeneration locations. These can and should include family homes. The plan seems to suggest that family homes and gardens can be provided only on the Green Belt. That is patently untrue and examples of mansion blocks with shared gardens, terraces with gardens and other building forms that can provide a range of unit sizes including smaller units and family homes combined with outdoor space can be found all over the UK and beyond.

In summary, we do not believe that the proposed plan will deliver the housing that most local people need. What Enfield needs are affordable homes in areas with existing public services and good transport links, not unaffordable and sprawling executive homes in rural locations that use land inefficiently and increase car-dependency. The Council should refocus its objectives on building high quality mid-rise homes, in a range of unit sizes including family homes, in non-Green Belt locations across the borough. In particular, the Council should prioritise high quality development in under-utilised brownfield sites, that includes new high quality private and public open space.

5. BROWNFIELD/ PREVIOUSLY-BUILT LAND

Please apply these comments to Chapter 2: Spatial Strategy.

The Plan publicity states that 'Enfield Council is already maximising housebuilding on brownfield sites'. We dispute this statement and maintain that the Council is not fulfilling its statutory duty to examine 'all other reasonable options' to meet development needs or to use 'as much brownfield



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land as possible, optimising development densities’ [email response from the office of Robert Jenrick, MP] before considering Green Belt release.

The Council’s assessment of the potential availability and capacity in industrial areas and therefore of the options is flawed and should be revisited. In the Plan, the capacity of many brownfield sites is underestimated, viable sites are not included and calculations do not tally.

We also believe that there are opportunities to release strategic industrial land [as in Waltham Forest]. There are large areas of underutilised areas of industrial space in Enfield that could be redeveloped to provide capacity for both the preservation of industry and jobs and to release suitable sites for mixed use and housing development. For example, in Brimsdown, Meridian Water and Harbet Road.

The consultation was a missed opportunity to kick-start positive planning for the derelict and semi-derelict Harbet Road area. The Council has discounted the Meridian Water East Bank because it is Strategic Industrial Land (SIL) but Harbet Road Industrial Area is under-used industrial land. The designated Strategic Industrial Land is south and west of Harbet Road but there is also semi-derelict land north of Harbet Road.

To the north and west of Harbet Road is an area of land designated as Green Belt, but part of which is industrial/derelict in character and could be incorporated within a wider masterplan for the area.

Below: Green Belt land north of Harbet Road, Meridian Water East Bank





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There is also potential for the Council to accelerate the delivery of its own flagship scheme at Meridian water, to deliver additional housing on this brownfield site within the plan period.

6. THE CONSULTATION PROCESS

Please apply these comments to Chapter 2 question 1

We do not think that the Council has selected the right spatial strategy and we think that the choice of spatial strategy to put development in large areas of attractive countryside was based on a flawed process and that the decision does not have a sound evidentiary basis for meeting the policy tests required for a sound local plan.

Enfield Roadwatch attended the Extraordinary Council meeting on 9 June, at which a vote was taken as to whether to proceed to public consultation on the draft Local Plan. At the meeting each Councillor was given an opportunity to read out their prepared speeches about the Local Plan. All the Labour Councillors who were present, based primarily in the east and south of the borough, voted in favour of the Plan. All the Opposition Councillors, including Conservatives and Independents, voted against it. Given the Labour majority on the Council, the outcome was predictable. The voting patterns are set out in the table below, based on minutes of the meeting produced by the Council.

The plan had not been prepared in a collaborative cross-party way so the policies were not the results of workshops with councillors and residents over a period of time. Neither does it reflect public input at earlier stages. The Councillors were given only a few days to read and assess the hundreds of pages of the consultation document, so we question how many of the councillors knew what they were voting for or whether their constituents would support the policies.

There are 63 Ward Councillors in 21 wards.



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24 voted against, 34 for, and 5 did not vote. Voting patterns by Ward and political group as shown below.

24 Members of the Council voted against the draft Local Plan as follows:

	Council Ward	Name	Political Group	For/against	
1	Chase	Dino Lemonides	Independent - Community First	Against	
2	Southgate	Charith Gunawardena	Green Party - Community First	Against	
3	Southgate	Derek Levy	Independent - Community First	Against	
4	Southgate	Daniel Anderson	Independent - Community First	Against	
5	Southgate Green	Anne Brown	Independent - Community First	Against	
6	Winchmore Hill	Dinah Barry	Independent - Community First	Against	Leader - Community First Group
7	Cockfosters	Alessandro Georgiou	Conservative	Against	
8	Cockfosters	Elaine Hayward	Conservative	Against	
9	Cockfosters	Edward Smith	Conservative	Against	



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10	Chase	Andrew Thorpe	Conservative	Against	
11	Southgate	Stephanos Ioannou	Conservative	Against	
12	Highlands	Lee David-Saunders	Conservative	Against	
13	Highlands	Joanne Laban	Conservative	Against	Leader of the Opposition and the Conservative Group
14	Highlands	Glynis Vince	Conservative	Against	Conservative Group Whip
15	Winchmore Hill	Maria Alexandrou	Conservative	Against	
16	Grange	Chris Dey	Conservative	Against	
17	Grange	Andy Milne	Conservative	Against	
18	Grange	Terence Neville	Conservative	Against	
19	Bush Hill Park	Clare da Silva	Conservative	Against	
20	Bush Hill Park	James Hockney	Conservative	Against	
21	Town	Lindsay Rawlings	Conservative	Against	
22	Town	Michael Rye	Conservative	Against	
23	Town	Jim Steven	Conservative	Against	
24	Ponders End	Ayfer Orhan	Labour	Against	

34 Members of the Council voted for the draft Local Plan as follows:

	Council Ward	Name	Political Group	For/against	
1	Chase	Hass Yusuf	Labour	For	
2	Southgate Green	Claire Stewart	Labour	For	
3	Winchmore Hill	Ian Barnes	Labour	For	Deputy Leader of the Council
4	Southbury	Mahmut Aksanoglu	Labour	For	
5	Southbury	Ayten Guzel	Labour	For	
6	Southbury	Nneka Keazor	Labour	For	Cabinet Member for Community Safety & Cohesion
7	Turkey Street	Rick Jewell	Labour	For	Cabinet Member for the Environment
8	Turkey Street	Gina Needs	Labour	For	Cabinet Member for Social Housing
9	Turkey Street	Sabri Ozaydin	Labour	For	Mayor
10	Bowes	Tolga Aramaz	Labour	For	
11	Bowes	Katherine Chibah	Labour	For	Associate Cabinet Member (Enfield West)
12	Bowes	Achilleas Georgiou	Labour	For	
13	Enfield Lock	Birsan Demeril	Labour	For	



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	Council Ward	Name	Political Group	For/against	
14	Enfield Lock	Elif Erbil	Labour	For	
15	Enfield Highway	Ergun Eren	Labour	For	
16	Enfield Highway	Christine Hamilton	Labour	For	Deputy Mayor
17	Ponders End	Susan Erbil	Labour	For	
18	Ponders End	Doug Taylor	Labour	For	
19	Jubilee	Chinelo Anyanwu	Labour	For	
20	Jubilee	Nesil Caliskan	Labour	For	Leader of the Council
21	Jubilee	Alev Cazimoglu	Labour	For	Cabinet Member for Health & Social Care
22	Lower Edmonton	Sinan Boztas	Labour	For	
23	Lower Edmonton	Guney Dogan	Labour	For	Cabinet Member for Commercial Services
24	Lower Edmonton	Margaret Greer	Labour	For	
25	Edmonton Green	Tolga Aramaz	Labour	For	
26	Edmonton Green	Mahym Bedekova	Labour	For	
27	Upper Edmonton	Huseyin Akpinar	Labour	For	
28	Upper Edmonton	Kate Anolue	Labour	For	
29	Upper Edmonton	Mahtab Uddin	Labour	For	Cabinet Member for Children's Services
30	Haselbury	Mustapha Cetinkaya	Labour	For	Associate Cabinet Member (Enfield South-east)
31	Haselbury	Saray Karakus	Labour	For	
32	Haselbury	George Savva	Labour	For	Cabinet Member for Licensing and Regulatory Services
33	Palmers Green	Tim Leaver	Labour	For	
34	Palmers Green	Mary Maguire	Labour	For	Cabinet Member for Finance & Procurement

5 Members of the Council who did not vote

	Council Ward	Name	Party	For/against	
1	Bush Hill Park	Peter Fallart	Conservative	Did not vote	
2	Enfield Lock	Guner Aydin	Labour	Did not vote	
3	Enfield Highway	Ahmet Hassan	Labour	Did not vote	Associate Cabinet Member (Enfield North)



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4	Edmonton Green	Ergin Erbil	Labour	Did not vote	Associate Cabinet Member (non-geographical)
5	Palmers Green	Ahmet Oykener	Labour	Did not vote	

Source: Agenda Item 9 (Roll Call, Update to Minutes of the 9th June 2021) Enfield Council

Problems with the consultation process

Many people have expressed their concern to us about the consultation process. We share their concern. The current Statement of Community Involvement [SCI] approved in 2020 sets such a low bar that it appears that the Council does not want residents to engage with them on this extremely important topic.

The ELP_2039 Reg 18 for consultation document is too long and complicated for most residents to follow, while the thousands of pages of documents in the evidence base [many added during the consultation process] make it virtually impossible for anyone but a planning expert to understand what they are consulting on and how the [sometimes conflicting] evidence does or doesn't make a case for the Council's preferred option.

More than two months into the three-month consultation window, the Council finally sent a leaflet to [we assume] all residents. The leaflet propagates the same misinformation that is contained in many of the plan documents and promotes only the Council's preferred option, so does not allow residents to consider alternatives. We note also that the leaflet only provides one way to respond to the consultation – via the letstalk platform – which disenfranchises residents, many of them elderly or more deprived, who do not have access to the internet. Not until you get onto the platform, do you learn that you can also respond by letter, a preferred option by many people.

Enfield RoadWatch has worked hard to fill the gaps left by the SCI, using social media, leafletting, newspaper ads and other means to inform as many people as possible about the consultation and what the preferred option would mean for the future of Enfield.

Many people have questioned whether it is worth their time responding to the consultation. The previous Issues and Options consultation also suggested building on the Green Belt – as now before any appropriate evidence was in place to make the case for it – and people responded clearly, telling the Council that they were against Green Belt development and offering preferred alternatives of industrial land and other town centre and accessible locations. There has been a lack of transparency by the Council on this and a failure to take these views into account and properly address them.



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Many people who knew about the consultation were too confused or intimidated by the amount of documents to attempt a response. Many more people had no idea the consultation was even happening, why the Draft Local Plan is important or what it contains. As a result we have been contacted by hundreds of people requesting help to respond to the consultation and we have provided guidance on our website, via email, social media and even post, to those without internet access.

At the time of this submission, we have been copied on over 100 email responses and have been entrusted with over 1,100 response letters which have been delivered to the Local Plan team.

Considering all these issues, we challenge the validity of the consultation process so far and believe that the Council should return to the issues and options stage with the appropriate evidence available. There should be a reconsideration of the alternatives. The Council also needs to take into account and address the strength of opposition to Green Belt development.

Unlike the 2019 Issues and Option consultation, this time there is no consultation portal, which allows respondents to view other people's responses. Enfield RoadWatch would like to see the Council publish responses to the draft Local Plan consultation promptly and in full, rather than simply publishing a summary together with Council responses on the eve of the Regulation 19 consultation.

8. CONCLUSION

Enfield RoadWatch welcomes the opportunity to comment on the Local Plan. We support the need for additional housing, especially for those on the housing list, and we applaud attempts to create a greener more sustainable Borough for all residents. However, we believe that the Council's preferred option would be a disaster for Enfield's residents, now and in the future. Despite the rhetoric, there are alternatives to building on the Green Belt, which is a community asset valued by residents all over the borough. The Green Belt provides benefits for everyone and will play an increasingly important role as we face more environmental and other challenges in the years ahead.

Contrary to the arguments being made in favour of the preferred option, there are brownfield sites available, where housing and other needs can be met while improving deprived areas and introducing new green spaces at the same time. This does not mean packing people into skyscrapers, but creating the density needed through high quality human scale development with plentiful green space, as has been achieved successfully in many other places.

We do not believe that the Council has adequately demonstrated that exceptional circumstances exist to justify changes to the Green Belt boundaries, as required per paragraph 141 in the NPPF. It has not examined fully all other reasonable options for meeting its identified need for development such as



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making as much use as possible of suitable brownfield sites and underutilised land or optimising the density of development

By making the correct decisions now, Enfield can be a model for other local authorities and somewhere our children's children will be proud to live. If Green Belt is removed, that will not be the case. The Council should go back to the drawing board on brownfield/ industrial options, then re-run the issues and options consultation. Without doing this we do not believe the process can progress to a sound plan.

Ian D'Souza
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