



Sadiq Khan
Mayor of London
City Hall, Kamal Chunchie Way
London E16 1ZE

By email to: mayor@london.gov.uk

21st September 2023

Dear Mayor,

Re: Enfield Planning Application 22/01542/OUT Anglo Aquarium Plant, 30 and 32 Strayfield Road, Enfield, EN2 9JE. GLA reference: 2022/0660/S2.

CPRE London is a membership based charity with 2500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.

We are writing to express our strong objection to the above planning application which was recently granted permission by Enfield Council subject to GLA approval.

It is a Green Belt site, currently in horticultural use, targeted for housing. The LB Enfield officers analyse the application and objections in detail and conclude, we believe in error, that the applicants have made their case for Very Special Circumstances.

We request that the GLA planners reject the application for the following reasons:

1. **Permitting this development sends a direct message to developers and speculators that land in Crews Hill is available for development.** (1) This **creates extreme pressure** for land to end up with developers who will then simply continue to push for release. (2) This also **prejudices the Local Plan process** where the borough is seeking to release Green Belt here and elsewhere in the borough, despite availability of brownfield alternatives.
2. Stage 2 permission by the GLA for this site [which is not one of the Green Belt sites in the council's target list] would set a **dangerous precedent for all the other sites under threat in Enfield, and particularly in Crews Hill.** Once the housing need argument has been accepted once, it will be used in every case and the Green Belt will be lost.
3. The Very Special Circumstances case is accepted purely on the basis of **housing need**, which the officers claim outweighs all other considerations, however this is an **insignificant amount of housing (58) – super low density, making poor use of land, and car dependent – when compared to the great harm which will be caused to the Green Belt** – not least because it opens the doors to the wider development of Crews Hill – which is an isolated Green Belt conurbation of, largely, plant nurseries which have – because of lack of enforcement and no other reason – become permanent buildings. You will be aware that Enfield continues to promote a number of large Green Belt sites for development, over the objections of the GLA and TfL at the Reg 18 stage. Despite more than 7,000 responses at Reg 18, the majority critical of the council's plan, we understand the Green Belt sites will be brought forward again at Reg 19, despite the availability of brownfield PDL sites around the borough, for which housing capacity has been underestimated.



4. The officers in fact conclude that the development would cause **significant harm** to the openness of the Green Belt and would be **inappropriate development** within the Green Belt.
5. **We have only just been able to find the GLA Stage 1 report on the GLA website**, but the officers' summary indicates that the GLA considers the site previously-developed land. **The officers themselves disagree with this conclusion**, along with all the objectors. Agricultural buildings cover 97.6% of the site so only a very small percentage should be considered PDL.
6. Additionally, disappointingly, the GLA's Stage 1 report states that, despite being non-compliant with the London Plan, they would be content as long as certain adjustments are made, largely relating to transport. This is an extremely isolated area where car dependence is the norm and it is unrealistic to expect that the vast majority of trips will be made by any other mode than car – no matter what adjustments are made. We strongly believe the reality is that **this development will simply be car dependent** and for this reason alone should not be permitted.

We have appreciated your strong support for the Green Belt and your clear and direct criticism of the council's plans at the Reg 18 stage. We hope we can count on you to maintain that position on this single application, which could be seminal, and at the Reg 19 stage. Several civic groups and organisations in Enfield are collaborating to prove the council's plan unsound and provide alternative solutions to meeting housing need while preserving the Green Belt.

We'd be happy to provide any further information you require.

Yours sincerely,

Alice Roberts
Head of Campaigns
CPRE London