



The Enfield Society & Enfield RoadWatch
in partnership with
Friends of Trent Country Park
Trent Park Conservation Committee and
Western Enfield Residents' Association

Response to House of Lords Built Environment Committee, Module Two: Inquiry into new towns and expanded settlements.

About the respondents

1. The Enfield Society was formed in 1936 and has a long history of working with the local authority to preserve and enhance the heritage and natural environment of the London Borough of Enfield. It has around 1,600 members.
2. Enfield RoadWatch was formed in 2015 to oppose plans to build on Green Belt to the south of Enfield Road. Since then it has had a very active history representing residents in western Enfield through numerous public consultations regarding the Green Belt and the Registered Historic Park of Trent Country Park.

**Response to Question 1: If new towns are to be built in
i) inner urban, ii) edge of urban, and iii) rural locations:
a. How should the principles of good placemaking
adapt in order to build viable places with a positive
character and identify?**

3. The New Towns Taskforce has suggested Crews Hill and Chase Park (better known as Vicarage Farm) and land in between and surrounding these two areas in the London Borough of Enfield for a potential new town of 21,000 homes. This whole area is part of London's Green Belt. Within the three categories listed, the area could qualify as ii) edge of urban in that it lies to the north of Enfield's built-up area (although edge of suburban would be more appropriate given the low-density residential area to its south and east) and iii) rural in that it consists of rolling landscape, which includes tenanted working farms and horticultural businesses.
4. The New Towns Taskforce Crews Hill proposal relates uncomfortably to the Council's draft Local Plan, which is currently the subject of a Local Plan Examination by the Planning Inspectorate (Inspector Stephen Lee). The draft Local Plan proposes development separately at Crews Hill (approx. 9,000 homes) and Chase Park/Vicarage Farm (approx. 4,000 homes). The New Town proposal, which is vague at present in terms of its boundaries, appears to encompass a much larger development area than the Local Plan proposal.
5. The New Towns Taskforce Report to Government [8] describes the area as 'poor quality land' and 'low value land comprising commercial nurseries, garden centres, a golf course and lower quality greenfield land' (page 37). Considerable expert evidence to the contrary has been submitted by local interest groups during the Local Plan Examination. It therefore seems that this evidence was not shared with the Taskforce nor did they conduct any independent analysis or they would have come to a different conclusion about the suitability of the area. We summarise this evidence below and the original reports are listed in the bibliography and included with this submission.

Response to Question 1: If new towns are to be built in i) inner urban, ii) edge of urban, and iii) rural locations: b. What are the current barriers to good placemaking in these different locations, and how can they be overcome?

Historic Enfield Chase

6. The character of the northern part of the London Borough of Enfield is to a large extent bound up with its history and the pattern of development around the open spaces of Enfield Chase. Enfield Town centre originated as a small settlement on the edge of the Old Park deer park in Anglo-Saxon times. From the 12th century, Enfield Chase was a large and important hunting preserve, initially after the Norman Conquest owned by leading nobles and from 1419 by the monarch through the Duchy of Lancaster. It is originally thought to have been administered from Camlet Moat (a scheduled ancient monument now in Trent Country Park) at its geographic centre. The Chase was divided into three 'Walks' each administered from a Lodge (West, South and East Lodge). The names of these lodges still exist in the area. Many of the borough's heritage assets and Conservation Areas relate in some way to the Chase. Details of the Chase and its history have been submitted to the Planning Inspector as part of ongoing Examination of Enfield's Local Plan [1].
7. The historic structure of the Chase is still extant because it was preserved by the advent of Green Belt legislation and the far-sighted decision of the Middlesex County Council in 1936 to purchase large areas of land for the specific purpose of preserving the historic Chase as open land in perpetuity. The Chase was enclosed in 1777 and the post-enclosure farmland landscape is historically as important as the pre-enclosure history. The Enfield Characterisation Study (2011) produced by the Council, describes the 'Farmland Ridges and Valleys' as the 'most important' landscape character type in the borough, which is 'a major asset' to the Borough [2] (p120), and which is of both local and regional importance'.
8. As part of the Local Plan Examination, The Enfield Society commissioned ACTA, Historic Landscapes Consultants to produce The Enfield Chase Statement of Heritage Significance [1]. Their report comments "Enfield Chase as an institution has spanned a period of at least 800 years, can still be traced on the ground and is exceptionally well documented for 600 years. The same cannot be said for the majority of other chases, so Enfield is of high significance in this respect." "Many chases just faded away in the eighteenth and nineteenth centuries. Waltham Chase for instance was the hunting ground of the bishops of Winchester, but is now just the name of the nearby village. However, Enfield Chase became a new landscape of small fields with hedges, hedgerow trees and small blocks of

woodland. It has its own character and serves a wide range of purposes. We think that the enclosure landscape has been undervalued and this is reflected in the following text”

“There are two noteworthy features here. The first is the survival of such a large area of enclosure landscape on the edge of London with a completely different character to its historical one. Chases are a common enough feature in the west and north and are largely in rural areas. A number are now woodlands of nature conservation importance such as Cannock Chase. Others such as Pensett, Needwood and Waltham have been absorbed into the surrounding landscape. Enfield Chase may not be the only example of its type, but it has been difficult to find another. We suggest that it survived because of the many vested interests in the common grazing, its importance as a source of fuel near the capital and the intractability of the clay and gravel soils...The second is the survival of the idea of the chase in everyday life in Enfield—few if any others have their own railway station.” ACTA also explained that the Chase is of Medium to High significance for its Group Value in understanding a range of heritage assets related to it.

Valued Landscape

9. The Enfield Society commissioned expert landscape consultants ENPlan to undertake an appraisal of the impacts of the proposed developments PL10 Chase Park and PL11 Crews Hill on the wider landscapes of Enfield Chase. “The overall character and appearance of the chase is strongly rural and a welcome sense of tranquillity and remoteness can be obtained even at a short distance from the urban area and the busier roads. However, the even more distinct perceptual quality is the chase’s high scenic value due to its good condition, largely unspoilt character, expressive rolling topography and mature landscape structure, and critically to this, its sense of space and visual openness.” [3], paragraph 4.25. ENPlan evaluated the landscape and concluded that it is a ‘Valued Landscape’ for the purposes of Paragraph 180 of the NPPF [3], para 4.33, page 38.

Topography

10. The topography of the Chase is influenced by the two small rivers crossing the area from west to east flowing towards the Lea Valley, Merryhills Brook to the south and Turkey Brook to the north. This topography has been highlighted during the Local Plan Examination as a barrier to active travel, should the area be developed. Analyses of both the Chase Park/ Vicarage Farm and Crews Hill sites show that they that cannot achieve LTN1/20 compliant gradients [4], [5].

Significant local views

11. There are significant local views across the area, including from the corner of Trent Country Park looking south-east across the Merryhills Brook Valley across the historic landscape of

the South Walk towards St Mary Magdalene Church. There are also the views across Kings Oak Plain from the Hertfordshire Chain Walk and from the Ridgeway there is a view across open fields to central London.

Environmental factors

12. Classifying the area as 'low quality land' and 'lower quality greenfield land' is true for only one criterion. The majority of the area is Grade 3b soil in the Agricultural Land Classification (ACL) system. However, historically and currently the farms have mostly been used for grazing, with some arable such as oil seed rape production. The area is still actively farmed.
13. The area is also rich in wildlife, particularly avian species. Enfield RoadWatch commissioned a Preliminary Ecological Assessment (PEA) of the Enfield Road fields (part of the Chase Park allocation) and the Friends of Trent Country Park commissioned a PEA of Vicarage Farm [also part of the Chase Park Allocation]. The Enfield Road fields PEA concludes that "The site would qualify as a Site of Local Importance for Nature Conservation (SLINC)" [6]. And the Vicarage Farm PEA concludes that Vicarage Farm exhibits "considerable potential with regards nature conservation value." [7]. Both sites have been put forward to the GLA as Local Nature Recovery Strategy sites.
14. Furthermore, large parts of Enfield Chase have benefitted from environmental enhancements, as part of the London Borough of Enfield's Landscape Restoration initiative. Funded by DEFRA, the GLA and Forestry Commission there has been extensive woodland planting, wetland creation and new footpaths installed. All this investment of national and regional funds and thousands of volunteer hours would be jeopardised by the proposed New Town.

Summary

15. The current barriers to placemaking in the proposed Crews Hill and Chase Park New Town are therefore:
 - The Green Belt designation and the continuing need to prevent London sprawling into towns and villages in Hertfordshire
 - The need to protect historic Enfield Chase as an area of heritage significance
 - The need to protect the adjoining Trent Country Park, a Registered Historic Park, (Grade II Listed on the national register)
 - The need to protect Enfield Chase as a 'valued landscape'
 - The need to protect significant and important local views
 - The need to safeguard the environmental work, tree planting etc. already carried out across Enfield Chase.

- The need to protect the biodiversity of the area, including the existing SINCs and proposed SINCs
 - The need to retain the recreational facilities in the Green Belt, walking, horse riding, cycling, bird-watching.
 - The need to retain significant local employment at the garden centres at Crews Hill
16. For all these reasons it is very difficult to see how much-valued Green Belt land can be developed in terms of good placemaking.

References

- [1] Enfield Chase Statement of heritage significance, ACTA, 2024
- [2] Enfield Characterisation Study, February 2011. Enfield Local Plan evidence base DES42 & DES43.
https://www.enfield.gov.uk/_data/assets/pdf_file/0017/61730/Document-library-Planning.pdf
- [3] Enfield Chase Landscape Appraisal, ENPlan, May 2024
- [4] Appendix to representations in respect of PL11: Crews Hill Assessment of Compliance with LTN1/20 Table 5.8
- [5] Appendix to representations in respect of PL10: Chase Park Assessment of Compliance with LTN1/20 Table 5.8
- [6] Glebe Fields, Enfield Road: Preliminary Ecological Appraisal, April 2023
- [7] Vicarage Farm, L B Enfield: Preliminary Ecological Appraisal, January 2024
- [8] New Towns Taskforce Report to Government, September 2025.
https://assets.publishing.service.gov.uk/media/68d694b79cb44667f7a1cee7/New_Towns_Taskforce_Final_Report.pdf