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Dear Consultation Team,

I am responding to your consultation on the revised version of the National Planning Policy Framework (NPPF).

I am writing on behalf of Enfield RoadWatch, an action group based in the London Borough of Enfield. We have a local supporter base of over 1,200, much wider support nationally via our Change.org petition and we work closely with other local organisations and national organisations such as the countryside charity, Campaign to Protect Rural England (CPRE).

We have serious concerns about several sections of the revised NPPF. Thank you for the opportunity to respond to this important consultation. Our thoughts are as follows:

Question 133: *Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. Please provide your reasons, particularly if you disagree.*

Strongly disagree.

We oppose changes to Green Belt policy contained in draft policy GB7 to allow more development on the basis that it is close to a railway station.

Enfield is fortunate to be well-connected with stations throughout the borough, and in many cases regeneration around some of those stations would be welcomed. However, this policy change would also encompass some areas of Green Belt where development would significantly harm the borough. In particular:

Trent Country Park - a large area of Trent Country Park is bordered on the west by the Piccadilly Line running between Oakwood and Cockfosters stations, and some popular sporting facilities. Within the proposed 800m radius from the station, development would result in the loss of the following public green space, sporting facilities and biodiversity:

- A large area of Trent Country Park, which is visited by about a million people a year from all over the region.
- The target area consists mostly of acid grasslands, which are a rare and irreplaceable habitat in London
- Trent Park Golf Course, which is one of the few golf courses accessible by tube in London. Trent Park Golf Course is a public course and very popular with players of all levels from all over London
- Trent Park Equestrian Centre, which is also just a short walk from the station, and which draws riders of all levels from a wide area.

- High-density development in this area would also put pressure on two Sites of Importance for Nature Conservation (SINCs) and would threaten the biodiversity of the rest of the park, which is known for its birdlife, rare fungi and more.

Although the intention would be for car-free or car-lite development, we can use the example of the Trent Park residential development by Berkeley Homes to show that this is unlikely to be the case in our outer London borough. Parking is restricted in the Trent Park development, but this has suppressed sales and residents have ignored the restrictions, parking wherever they can. New residents in a car-free/ car-lite development would no doubt do the same, spreading their vehicles onto neighbouring residential streets and exacerbating the current traffic congestion.

Building on the Green Belt within 800m of Oakwood and Cockfosters stations would also contradict policy GB5 on the beneficial uses of Green Belt land, by making open countryside less accessible for both existing residents and also for people accessing it by tube.

Enfield Chase Landscape Restoration project – Crews Hill station sits on the edge of the Crews Hill settlement, which exists within the Green Belt, operating under the horticultural exception. There are farms and open Green Belt to the north, west and south of the station. More than 1,000 hectares of the open Green Belt are included in the Enfield Chase Landscape Restoration project and millions of pounds of government and other grants [Defra, Forestry Commission, GLA, etc] and many thousands of volunteer hours have already been devoted to tree-planting, habitat restoration and improved public accessibility in the project area. Permitting development within 800m of the station would destroy much of this investment. Also, within the 800m radius are productive farmland and horticultural businesses and a popular heritage golf course, which contains a SINC. The station, with a line that runs from Hertfordshire into the city, would be unable to satisfy the transportation needs of any future residents, even with an increased service, and the development would by necessity become car dependent, putting immense strain on both the rural road network and the main roads nearby, including the M25.

We support a policy that encourages more housing development on previously developed or brownfield land close to railway stations in towns, as this would help regenerate existing towns.



Question 136: Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. Please provide your reasons, particularly if you disagree.

Strongly disagree.

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an increased service, and the development would of necessity become car dependent, putting immense strain on both the rural road network and the main roads nearby, including the M25.

Green Belt policy has been one of the most successful planning policies since its inception, preventing sprawl and encouraging urban regeneration. In recent years, the importance of protected green spaces has become even more important in response to climate change and food security and nature depletion. **It is very short-sighted to consider developing areas of Green Belt at this time.** There are other solutions to the housing crisis, which must be prioritised, including the Government’s brownfield first policy, which should be given more resources to remove the barriers to much needed urban regeneration.



Question 145: Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree.

We continue to have major concerns about the ‘grey belt’ provisions introduced into Green Belt policy in the December 2024 NPPF. The definition is so imprecise that almost any land can be put forward as grey belt, and that is already happening. Despite claims made by the Prime Minister and others that the policy would only lead to the loss of supposedly ‘poor quality’ Green Belt land, much productive countryside is being lost. In December 2025, the Campaign for the Protection of Rural England (CPRE) reported that, of 1,250 homes submitted as part of applications on ‘grey belt’ land, 88% will be built on previously undeveloped countryside. Far from ‘disused petrol stations’ and ‘abandoned car parks’, the NPPF is allowing development on unspoilt rural landscapes.

In Enfield, a developer, Comer Homes, owns the formerly productive arable Vicarage Farm and is claiming it is grey belt because it is infill, which it is clearly not. But the vague grey belt definition allows Comer Homes to argue that case. Also in Enfield, both the Local Authority and the Government are claiming that a vibrant rural settlement, Crews Hill, home to multiple garden centres, that are operating under the horticultural exception in the Green Belt, and a major employment area, is grey belt.

We believe that ‘grey belt’, rather than being widened, should be removed from national planning policy, with major development only being allowed in the Green Belt if it is agreed through the new spatial development strategies. At the very least, the policy should be narrowed to exclude productive farmland and local wildlife sites from being designated as grey belt, and grey belt development should not be allowed on appeal against local refusals of planning permission.



Question 181: Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. Please provide your reasons, particularly if you disagree.

Partly agree and partly disagree.

We are concerned that the new policy N2 will be insufficient to protect valued aspects of our rural landscapes, especially those outside nationally protected landscapes which are covered by Policy N4. Valued aspects of landscapes are currently protected under paragraph 187 of the current NPPF. We therefore ask for N2 paragraph 1(a) to be amended to refer to 'landscape character and value'.

In Enfield, the last remnants of [historic Enfield Chase](#) are under threat from proposed development in the Local Authority's draft local plan, (currently under examination), and by a New Towns Taskforce proposal for a new town on 884 hectares of the historic, valued landscape. Not only is the Enfield Chase Green Belt 'highly valued' in planning terms, but also by the residents of the borough and people who visit it for exercise, relaxation, to pick fruit and vegetables at Parkside Farm, bird-watching or simply driving through, enjoying the long views of London across rolling farmland.

We also do not believe that protection for our highest quality farmland is strong enough. Campaign to Protect Rural England (CPRE) reports that, between 2010 and 2022, we lost over 14,000 hectares of prime agricultural land to development, including 287,864 houses — equivalent to the productive loss of around 250,000 tonnes of vegetables and enough to provide nearly two million people with their 5-a-day for an entire year. We call for policy N2 paragraph 1(b) to be changed to state a firm presumption against development of the highest quality (grades 1-3) farmland and, in areas where grade 3b predominates, presumption against development on the basis of food security and food miles. For example, in Enfield, wheat is grown on Rectory Farm and travels only 5 miles to Wrights's Ponders End Mills, and yet Rectory Farm is under threat.

We welcome the new policy protections for established trees and hedgerows in policy N2 paragraph (1) (d), but call for the words 'wherever possible' to be removed as this will encourage non-compliance. Developers should be required to retain hedgerows where new development takes place.