



Fighting for Enfield's countryside and for affordable homes in the right places

Dear Supporters

We hope you enjoyed your summer break.

While everything appeared calm on the surface a lot was going on beneath:

- In June, Enfield's Planning Inspector released his [Post Hearing Letter](#), which, while not finding all the Green Belt development proposed in Enfield's Draft Local unsound, does offer a few glimmers of hope. It remains to be seen how his conclusions will mesh with all the planning changes listed below. At this point, Enfield Council is working with the Inspector on major modifications to the draft plan and the final plan should be ready for adoption early next year.
- In August, the revised National Planning Policy Framework [NPPF] was published, and it is not good news for the Green Belt. The new version removes a lot of protections from the Green Belt, includes a dangerous Grey Belt policy, and streamlines planning approvals within 800m of transport hubs and railway stations.
- The Government has also stripped local authorities of many of their planning powers. [\[Dispatch article\]](#)
- The London Plan sits between Enfield's Local Plan and the NPPF and all three are supposed to align. In June the Greater London Authority [GLA] published the draft London Plan, which allocates a lot of Enfield's Green Belt for development. A consultation is ongoing until October 15. More about this below.

While most of this news is disheartening, to put it mildly, we will continue to fight for the Green Belt. Especially after the repeated heat waves of this summer, it makes no sense to build on London's 'Climate Safety Belt' and many other organisations agree with us. Enfield's new Conservative administration is also working hard on this issue. The draft London Plan contains errors, omissions and inconsistencies that can all be challenged, and we will.

We urge you and each of your family members to participate in objecting to the draft London Plan and, as usual, we have tried to make it as easy as possible for you with specific instructions and suggested responses, all of which you will find below and on our [website](#). Once you have your responses drafted, the actual submission process does not take long.

The consultation is the equivalent of the Regulation 19 consultation that many of you participated in for Enfield's draft Local Plan. That means it is focused on whether the draft London Plan is sound or unsound, which are technical planning terms. Please don't let that put you off. By following our guidance, you don't need to address soundness. Several thousand of you responded to the Enfield consultation using our suggested responses, and we are providing equivalent arguments to key areas again. Please remember to put them in your own words, if possible. You are, of course, free to object to any of policies, not just the ones we suggest.

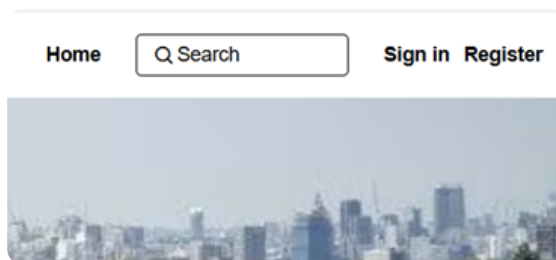
Thanks, as always, for your support.

Together we are stronger.

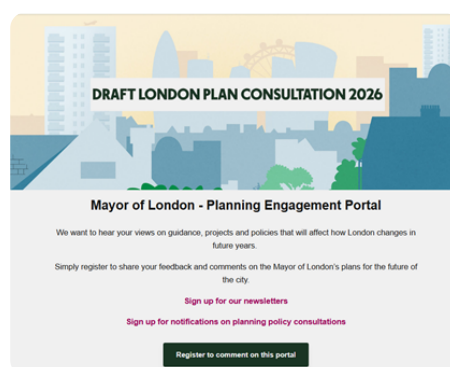
Ian D'Souza
Chair

Here are the steps for completing the consultation:

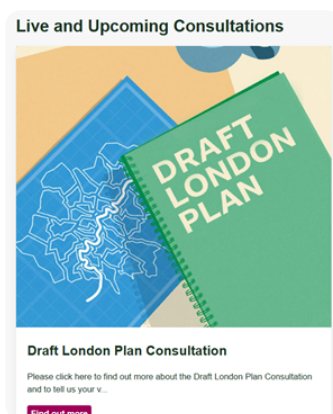
- 1 Go to: <https://consult.london.gov.uk/londonplan>
- 2 Register – you cannot complete the surveys without registering. Please write down your registration details as you will need them to log in again if you continue later with another survey.



- 3 Once you have registered, you will see this page



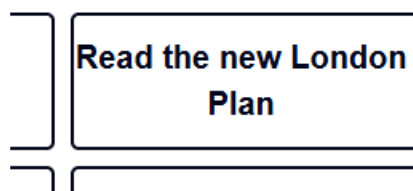
- 4 Scroll down and click on this box:



- 5 You are now on the main Draft London Plan Consultation page. Everything happens from this home page.



- 6 If you want to read the complete plan click "Read the new London Plan".



7 This will take you to a page where they give a number of ways to read/ download the complete plan.

Read the new London Plan

Each chapter of the new London Plan contains a number of policies. We have listed and summarised the Policies contained in each chapter in this section, and provided a link to the chapter so that you can read the original document. We have also provided a link to the entire new [draft London Plan document](#).



We have also produced a PDF of the draft London Plan that you can download [here](#).

Please note two minor corrections were made to the draft London Plan document on 27 July, one minor correction on 1 September, and one minor correction on 11 September. You can view these [here](#).

[Making best use of land](#)

[Delivering the homes and neighbourhoods Londoners need](#)

[Growing London's economy in a way that benefits all](#)

[Creating a greener, resilient and healthy city](#)

[Place visions and place-based approaches](#)

8 Each time you leave the main page, you can return to it by clicking “About this consultation”. Or by going back to: <https://consult.london.gov.uk/londonplan>

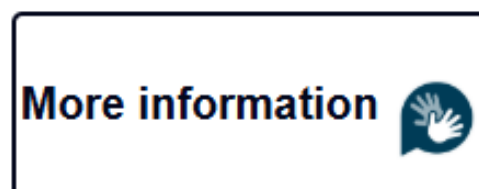


9 All the evidence documents can be found at: <https://www.london.gov.uk/programmes-strategies/planning/london-plan/next-london-plan/london-plan-evidence>

10 It is a good idea to download the consultation questionnaires/ surveys before trying to complete them because you cannot save a partially completed response. The consultation website advises:

Please note that it is not possible to save a partial response made through our questionnaires and return to it at a later date but it may be helpful to prepare your response separately using our downloadable questionnaires, and paste your responses in when ready. See the tab ‘More information’ for downloadable questionnaires. We anticipate that each questionnaire would take around 15 minutes to complete, depending on the amount of feedback you have and the number of policies you wish to comment on.

To access the downloadable questionnaires, click “More information” and scroll down.



You will see **FIVE** separate chapters [Chapters 2 to 6] which can each be downloaded separately.

We have also downloaded these documents to our website and you can find them [here](#).

[Note: You do not have to complete all the chapters before you submit. Submitting individual chapters as you complete them is fine. You do not have to complete each chapter.]

Survey - Chapter 2: Making best use of land and achieving good growth
366.63 KB PDF

Survey - Chapter 3 - Delivering the homes and neighbourhoods (HN) Londoners need
365.56 KB PDF

Survey - Chapter 4 – Growing London's economy
400.68 KB PDF

Survey - Chapter 5 - Creating a greener, resilient and healthy (GHR) city
392.66 KB PDF

Survey - Chapter 6 - Place visions and place-based approaches
337.50 KB PDF

11 Once you have rehearsed your responses and know what you want to say, proceed with the surveys. [Select the chapters that you want to respond to. You do not have to complete every survey.] First click on 'Tell Us Your Views' and you will see this:



Tell us your views

You can reply by completing our surveys, which should take no more than 15 minutes to complete. There are separate surveys for each chapter of the draft London Plan which contains policies; where there is no survey for a chapter of the Plan, that is because that chapter does not contain policies for you to review and comment on.

Make a representation - Chapter 2 - Making best use of land and achieving good growth

Make a representation - Chapter 3 - Delivering the homes and neighbourhoods (HN) Londoners need

Make a representation - Chapter 4 - Growing London's economy

Make a representation - Chapter 5 - Creating a greener, resilient and healthy (GHR) city

Make a representation - Chapter 6 - Place visions and place-based approaches

12 Click on the relevant chapter – we are using Chapter 2 as an example. Each survey starts the same way:

- Questions 1 – 3 are about you and the overall process. Complete them as appropriate [Probably Q1 - member of the public; Q2 - community and resident groups; and Q3 - Yes] Please note: the layout and question numbers are different from the practice version. Online the comment boxes only appear if you click certain options and Q4 is Q3
- The online survey itself will also look different from the downloaded practice version, because the comment boxes aren't evident. Don't worry. Once you click No or Don't Know a comment box allowing up to 20,000 characters will appear.

4. MBUL1: Spatial Strategy

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- ☐ Yes
- ☒ No
- ☐ Don't know

5. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness. You may want to consider the following questions as part of those reasons:

- Does the Plan identify the key needs of the area appropriately?
- Are there additional needs that should be addressed?
- Is the draft policy supported by proportionate and appropriate evidence?
- Have reasonable alternatives been considered? Our IIA is here [Draft London Plan consultation resources | London City Hall](#)
- Are there alternatives you think should have been assessed?
- Can the Plan be delivered?
- What barriers may affect implementation?
- Do you consider the Plan is consistent with national policy? If not, what are the areas of inconsistency?

Please note that responses to this question are limited to 20,000 characters. If needed, you may attach a supporting document to the last question to provide additional details or expand on your response.

Maximum 20,000 characters

0/20,000

13 Paste your response into the comment box. The comment boxes don't carry over any formatting so will look like this:

Please note that responses to this question are limited to 20,000 characters. If needed, you may attach a supporting document to the last question to provide additional details or expand on your response.

I object to the proposed spatial strategy and associated policies.
1. Rail catchments and the proposed scale of development
The evidence supporting the use of a 1,200-metre walking catchment around rail stations identified for major residential growth is unclear, particularly in contrast to the 800-metre distance referred to in the LDDP.

Maximum 20,000 characters

3,753/20,000

14 Skip over any policies you are not responding to.

15 Q16 asks if you would like to attend the Examination in Public [It may be a different number in the different surveys but look for this question] Answer – No

16 At the end you have a chance to upload any evidence you would like to submit.

18. If you need to add any further information such as additional details or to expand on your response you can do so by attaching a document below.

 Upload file

17 Check that you are happy with what you've done and have completely finished this particular survey, then click Submit. The instructions state:

Please only hit 'Submit' once you have made all of the comments on this chapter that you wish to make. You will then be taken to a new page which will thank you for your submission. If you wish to comment on another chapter of the draft London Plan, please click the button on this page marked 'Back to project page'.

When you click 'Back to project page' you will need to click **Tell Us Your Views** again to access the surveys. Repeat for any other chapters you are responding to.

You will receive an email for each submission with your full response.

AND NOW TO THE SAMPLE ANSWERS.....

Sample responses to four key questions

We have chosen four questions from four different chapters that we think are important for you to object to. You don't have to do all of them [or you can respond to totally different ones] but they make important points about Enfield's Green Belt and the potential issues with its proposed development.

Please rephrase these samples in your own words, if you can, but keep the main points.

Chapter 2 - Making best use of land and achieving good growth

Policy MBUL 1 - Spatial Strategy

Q6 answer NO, then respond to Q7

Suggested wording:

I object to sections of this policy.

There needs to be a clear explanation for why a 1,200-metre walking catchment is being used for stations marked for major housing growth, when national policy uses 800 metres as the standard. The key question is whether there is solid evidence that people living further away (between 800m and 1,200m) will still use the train often enough to support higher-density, low-car development under Policy PV7.

This leads to a few important points:

1. What train service levels (now and in the future) have been assumed when predicting how people in this wider area will travel?
2. If extra capacity or more frequent trains are needed to make those assumptions realistic, how will those improvements be secured, funded and delivered?
3. And how will they be timed so that car-dependent travel patterns do not become established before the upgrades are in place?

This policy identifies J24 as suitable for industrial development. This directly contradicts the recent conclusion of Enfield's Planning Inspector in his post-hearing letter, where he states: *73. I do not consider this allocation is soundly based and the potential actions set out in document E9.2 would not alter that conclusion. The allocation would result in a very high degree of harm to Green Belt purposes and would, in effect, create an isolated 'hole' in the Green Belt near to Junction 24 of the M25. This would not extend the existing urban edge but rather create an entirely new pocket of built form in an area where there are currently only sporadic buildings. Notwithstanding the proximity of the motorway junction, the area retains a relatively rural character, particularly when heading into Enfield. 74. The introduction of large industrial or logistics buildings into this area would also result in a similarly high degree of harm to the character and appearance of the area.*

Additionally this policy states that Local Plans should: *(6) Help realise the identified strategic opportunities for nature recovery, enhanced access to green space, and cleaner, healthier waterways reflected in Environmental Opportunity Areas through site allocations, spatial policies and appropriate developer contributions that secure connected and multi-functional green and blue infrastructure.*

This policy fails to embed protection of **existing** biodiversity and habitats in the spatial strategy itself, relying instead on mitigation through BNG and other measures to foster nature recovery. As has become evident, BNG has too many loopholes, resulting in slow rollout of green and blue infrastructure or none at all. The Statutory Biodiversity Metric undervalues the complex interactions of habitats, so what is lost is not replaced. And given that many habitats can take 30 years or more to reach maturity, this omission in the policy could work against Nature Recovery instead of helping it.

Chapter 3- Delivering the homes and neighbourhoods Londoners need

Policy HN1 Increasing London's housing stock

Q6 answer NO, then respond to Q7

Suggested wording:

I agree that more homes are needed, but the numbers proposed for Crews Hill and Chase Park are not well-evidenced and do not appear realistic or achievable.

Enfield's Local Plan expects about 3,445 homes to come forward in these areas between 2027/28 and 2036/37. The draft London Plan, however, assumes 7,000 homes in the same period. This increase is hard to justify given concerns expressed by the GLA and TfL during Enfield's local plan examination about poor public transport access, the likelihood of car-dependent travel, and the major infrastructure upgrades that would be needed to make development sustainable.

There is also a wider risk. Building large amounts of Green Belt housing at the same time as major brownfield regeneration could divert investment, developer capacity and transport funding away from better-connected urban sites. The GLA raised this issue during Enfield's Local Plan process, but it does not seem to have been addressed here.

For these reasons, the GLA should explain what new evidence supports the proposed 7,000-homes and show that it can be delivered without harming brownfield housing delivery. If this cannot be demonstrated, the volume or timing of development at Crews Hill and Chase Park should be reconsidered.

Chapter 5 - Creating a greener, resilient and healthy city

Policy GR6 - Trees, biodiversity and geodiversity

Q21 answer NO, then respond to Q22

Suggested wording:

I want to see nature protected and restored, but the draft London Plan has not shown that the amount of development proposed for Crews Hill and Chase Park fits with that aim. If building at this scale would damage sensitive land, then the locations and the amount of development need to be reconsidered.

These areas are not empty pieces of Green Belt. They include valuable habitats, recognised nature sites (SINCs), woodland, hedgerows, grassland and watercourses. Enfield Council's own ecological studies, as well as commissioned professional reports and evidence submitted by local groups, highlight the biodiversity importance of these places. The Inspector reviewing Enfield's Local Plan has already asked for stronger protection for SINCs at Crews Hill. This cannot be ignored.

Despite this, the draft London Plan assumes 7,000 homes can be built at Crews Hill and Chase Park by 2036/37, which is roughly double the number Enfield expects over the same period. Before relying on such a large increase, the GLA needs to show clearly how this level of development could happen without causing unacceptable harm to existing habitats or breaking up SINCs. The priority should be protecting the nature that already exists, not assuming that any loss can simply be replaced later with new planting or biodiversity projects somewhere else.

As has become evident since its inception, BNG has too many loopholes, resulting in slow rollout of green and blue infrastructure or none at all. The Statutory Biodiversity Metric undervalues the complex interactions of existing habitats, so what is lost is not replaced. And given that many habitats can take 30 years or more to reach maturity, this omission in the policy could work against Nature Recovery instead of helping it.

Chapter 6 - Place visions and place-based approaches

Policy PV7 - Sustainable development and enhancement of the Green Belt

Q24 answer NO, then respond to Q25

Suggested wording:

I do not think PV7 is sound in its current form. A large Green Belt site should not be labelled "sustainable" just because one small corner happens to be close to a station. Crews Hill and Chase Park face major transport and environmental challenges. These areas include recognised nature sites (SINCs), important habitats, woodland, hedgerows, watercourses and open countryside utilised as an asset by the community. Evidence gathered through Enfield's Local Plan has already shown that some parts of these sites are too sensitive for development and need stronger protection. This has also been supported by the Local Plan.

Despite this, the draft London Plan assumes 7,000 homes can be built here by 2036/37, compared with around 3,445 in Enfield's own housing trajectory.

Before accepting such a large increase, the GLA needs to show two things clearly:

- That this level of development can be supported by genuinely sustainable transport delivered before car use becomes embedded, and
- That it can happen without damaging or breaking up important habitats and designated nature-conservation areas.

The Plan should set out which areas of land are environmentally sensitive and must be safeguarded. It should not rely on the idea that biodiversity loss can simply be “made up for” somewhere else with new planting or green space.

All this information is also available on our website at <https://enfieldroadwatch.co.uk/draft-london-plan-consultation-deadline-october-15/> in case it's easier for you to use it there.

Thank you for doing your part!

Links to some of our partner organisations:

[The Enfield Society](#)
[CPRE-London](#)
[Enfield Climate Action Forum](#)
[London Green Belt Council](#)
[Better Homes Enfield](#)
[Action for Enfield's Future](#)

Please stay in touch via our social media [buttons below] and keep up to date via our website. www.enfieldroadwatch.co.uk. If you haven't already signed, please join the thousands of people who have signed our [Change.org](#) petition. Go to: [Change.org](#) [then search for Protect Enfield]

Thanks for your continued support.



Enfield RoadWatch
info@enfieldroadwatch.co.uk



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