



Enfield Conservative Group

RESPONSE TO ENFIELD COUNCIL'S DRAFT LOCAL PLAN

SEPTEMBER 2021

September 2021

Response to the Draft Local Plan

Introduction

The Draft Local Plan contains in our view, several flaws, the most significant of which we attempt to deal with in the following paragraphs. In addition, there are several inaccuracies in the text which we know have already been picked up by other respondents and so do not require further repetition. On the whole, however, it must be said that as a Plan for the next twenty years, it is sadly lacking in foresight of significant changes that are likely to happen over the Plan period as a consequence of Brexit, climate change and changed ways of working which have already seen a major shift in people's choice of lifestyle leading to a redistribution of the population.

Population Growth

- Strategic Policy SP SS1: Spatial Strategy, Table 2.2: Spatial Strategy Options [page 26] states that the preferred option is to plan for 25,000 properties. However, the plan has been prepared both before and during the Coronavirus pandemic and therefore does not consider the population shift during the last eighteen months. Six hundred children are no longer attending Enfield schools. Over three thousand residents who currently have European status have not applied through the EU Settlement Scheme to remain in the United Kingdom [Executive Director for Finance, General Purposes Meeting, July 2021]. The three thousand figure is just the number of people with EU status that have engaged with the council and therefore the number of people who might leave (or have already left) the borough could be much higher.
- During the pandemic people moved out of London and it is uncertain whether they will ever return.
- In addition, the pandemic has undoubtedly changed the way people think about work and quality of life and there is every reason to believe that the change is both profound and likely to be long term.
- The projected requirement for 25000 new homes assumes a population growth well in excess of the national projections of the ONS which assume a 5% increase over the Plan period.
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2018based>
- The UK population's growth rate from mid-2018 to mid-2019, at 0.5%, was slower than any year since mid-2004. It then fell further the following year to 0.4% for mid-2019 to mid-2020.
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/latest>
- All of this therefore calls into question whether the proposed 25,000 homes figure is an accurate assessment; the need might well be lower, and this has not been explored in the document.
- The Conservative Group requests that the favoured 25,000 homes approach is reassessed in light of the impacts of the pandemic and changed work/lifestyles

Lack of housing delivery

- Strategic Policy SP H1 and H4. We challenge the emphasis of providing 25,000 new homes primarily on large sites (over 125 units) over the next 20 years. We believe that if the Local Plan as Drafted is adopted then the character of Enfield as a mostly green, suburban area will be damaged irrevocably.
- Too little attention has been paid to redeveloping "brownfield" sites, large and small.

- We welcome the emphasis in H4 of the contribution that small sites (under 0.25 hectares) can make to increasing the number of much needed homes in the borough (7,000 units over 20 years). This figure seems at variance with the figures in Table 8.2 for unidentified small windfall and other miscellaneous sites.
- We also think Meridian Water has the potential to create between 5,000 and 10,000 new homes over the plan period, and that delivery of this development needs to be accelerated. (The lower figure is quoted in Table 8.1. whilst the higher figure is quoted in PL5). The proposed 3,500 new homes on council owned sites programme will also make a significant contribution to housing supply in the borough
- Building a more realistic number of homes on small sites, council and RPI led development over the next 20 years would significantly reduce the need to develop on larger sites, including the Green Belt, envisaged in the Draft Local Plan.
- Para 8.1.15 comments that 16% of all permitted housing schemes in Enfield are not implemented and subsequently lapsed. The government is under pressure from MPs and others to introduce measures to prevent developers from gaming the planning system and not building schemes out. The 25,000 - housing target in the Draft Local Plan could be substantially reduced were such measures to be introduced. The Council should urgently consider measures that it itself could take to mitigate this problem.

Affordable Housing

- SP, H2 and H3. We generally welcome the approach taken to encourage the provision of more affordable housing in the borough, although greater recognition is needed of the potential role of housing associations working in partnership with the Council.
- We agree with Para. 8.2.15 that affordable housing contributions from developers should be calculated on the number of habitable rooms per unit and gross floor space and that contributions will continue to be assessed based on the financial viability of the schemes in question up to a maximum of 50%.
- Policies H5 and H6 in the Affordable Housing section of the London Plan set out clear targets on the level and types of affordable housing to be provided by developers on individual schemes. These targets have not been met by a wide margin on a number of recent planning applications for large schemes such as Arnos Grove and Cockfosters Tube Station and they need to be highlighted as a crucial feature in the new Draft Local Plan. H2 Para.4 in the draft is unclear in this respect and needs to be changed in line with the London plan.
- There is a widespread problem in the borough of developers providing too many one bed and two bed homes. We suggest that a similar approach as above be taken in the Local Plan to achieve the desired dwelling size priorities in table 8.1. in section DM H3 so that under the Local Plan developers are required to meet prescribed targets for different unit sizes for specific tenures to overcome the persistent under provision of larger units by developers.
- Surprisingly, no reference is made in para 8.2.5 of Section H2 to the new affordable discounted housing for sale product known as First Homes being introduced by government. This product will be delivered through s.106 contributions and may replace other forms of affordable housing, such as shared ownership. Although, this product is still only being piloted through the Affordable Homes Programme, some specific reference to the Council's response to this new initiative from a policy and planning perspective is in our view required in the Draft Local Plan document.

Meridian Water (PL 5)

- Strategic Policy PL5. The Council was told at the Examination in Public in 2018 by the Inspector that the Strategic Industrial Land within the Meridian Water site to the east of the River Lee (about a third of the site) cannot be released for housing

and therefore the housing and employment targets in the original Edmonton Leaside Area Action Plan (10,000 new homes and 6,000 new jobs) could not be sustained. The Council responded by revising its targets downwards to 5,000 new homes and 1500 new jobs.

- Para 3.5.6 in PL5 still refers to the original targets as an aspiration. The SIL at Meridian Water may be de-designated by the GLA at some future date, but this is speculation on the Council's part, and this should be made clear in the explanatory paragraphs and the consequences of this not occurring spelt out.
- No reference appears to be made in PL5 to the target levels for affordable housing to be achieved by phase and overall, nor to the desired dwelling size priorities to be achieved. There is also no guideline to the maximum housing densities to be achieved. The section on Meridian Water in the Draft Local Plan is basically a vague outline giving the Council carte blanche to develop whatever it thinks is expedient. No reference appears in this section to the revised ELAAP.
- We recognise that the future shape of the retail sector is unclear at the moment, particularly as respects traditional high street retail, but a development the size of Meridian Water involves the creation of a whole new community of potentially more than 10,000 people, which is going to need some retail provision. This is not dealt with adequately, or at all, other than by vague references in the document to the location, provision of retail, and other employment uses at Meridian Water. Clear proposals appropriate to this large-scale residential development should be spelt out in the Draft Local Plan.

Green Belt release

- The Draft Local Plan proposes de-designation of large areas of Enfield's Green Belt including the following sites:
 - (Policy SP PL9, pages 77-80 and Concept Plan Figure 3.10); Land at Crews Hill. The proposals according to the document will deliver 3000 homes.
 - (Policy SP PL 10, pages 80-87, and Figure 3.11); Land between Hadley Road & Enfield Rd, EN2, Bramley Road, London, N14 4UW. The proposals according to the document will deliver another 3000 homes.
 - (SA45: Land Between Camlet Way and Crescent Way, Hadley Wood, page 364); proposed delivery of 160 homes.
 - Industrial and office development in the Green Belt near Rammey Marsh (SA52 page 372).
 - 11 hectares of new industrial and storage and distribution use at what is currently agricultural land east of Junction 24 of the M25 at part of new Cottages and Holly Hill Farm within Enfield Chase (SA54, page 374);
- The Conservative Group strongly **opposes** the policies above and does not support the de-designation of the Green Belt for the reasons set out below.

London Plan

- Chapter 3, paragraph 3.12 states that "the place-making policies have been prepared in the context of the NPPF and the London Plan". The quote is not accurate, the Mayor of London's, London Plan has been signed off by the Secretary of State for Housing, Communities and Local Government to deliver homes in London whilst keeping Green Belt boundaries that are currently in place. The Administration by proposing Green Belt release has therefore not prepared a plan in the context of the London Plan.
- Section 24, Planning and Compulsory Purchase Act 2004 requires that "Local development documents for a London borough must be in general conformity with the spatial development strategy i.e. the London Plan. Section 24 also requires a London borough to seek confirmation from the London Mayor that the (draft) Local Plan is in conformity with the London Plan. It is surprising therefore that the Draft Local Plan makes no mention whatsoever of these statutory requirements, still less whether Enfield Council has complied with them <https://www.legislation.gov.uk/ukpga/2004/5/section/24>

- The National Planning Policy Framework (NPPF) at para 141 states "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans".
- Policy G2 of the London Plan (London's spatial strategy) reiterates this saying exceptional circumstances are required to justify de-designation of the Green Belt. The fact is that there are no exceptional circumstances as to why the Administration requires Green Belt release. The London Plan was signed off and published as recently as 2 March 2021 while this Local Draft Plan was being prepared. The London Plan is a strategic policy document that proposes delivery of the necessary homes the Capital requires whilst explicitly keeping Enfield's Green Belt boundaries in place. Given the timing of the two documents the Conservative Group is forced to conclude that exceptional circumstances do not exist, and if it is asserted that they do, it is a reasonable presumption that they were considered by the London Mayor in the course of preparation of his plan and dismissed by him as being unexceptional.
- Indeed, this is supported by an argument that the Mayor of London has himself used. In February 2019, GLA Officers, on behalf of the Mayor, sent a response to the consultation on an earlier draft.
- The response stated that The Mayor did not support proposals for Green Belt release. The document said that "*he does not support the release of the Green Belt as set out in Draft New London Plan Policy G2... The Mayor, in his Draft new London Plan has set out a strategy for London to meet its housing need within its boundaries without encroaching on the Green Belt or the loss of industrial capacity and therefore there are no exceptional circumstances to warrant a Green Belt review*". This approach has continued through to the adopted London Plan
- The Administration has not only ignored the strategic authority's views but expanded its proposals for Green Belt release in its latest document which is plainly not in conformity with the London Plan and thus potentially contravenes section 24 of the 2004 Act, and it cannot be supported.

Number of homes

- Notwithstanding the Conservative Group's outright opposition to any release of Green Belt Land, we are bound to make the following observations on this section:
 - The document is ambiguous when it comes to potential development within the Green Belt. For example, we know that a developer has already created plans for over 5500 homes for the site at Vicarage Farm alone, in anticipation that the area will be released.
 - The Draft Local Plan states what planners believe could be built within the life of the plan, not what individual sites could eventually deliver. There is an obvious disconnect between the two which would strongly suggest that the release of such sites on the scale proposed is not required.
 - This disconnect impacts all the sites proposed for development within the whole plan. If the non- Green Belt sites can deliver more homes once built out, that of itself seriously challenges the document's argument for Green Belt release.
 - The Conservative Group, despite opposing all de-designation proposals for sites within the Green Belt calls for greater transparency in relation to the number of homes these sites will deliver, not just the number within the plan period.

Lack of transport infrastructure

- The Draft Local Plan promotes the view that there are strong sustainability arguments in favour of developing Green Belt land at Crews Hill. One of the main arguments used is that it has a railway station which provides links into central London and can be considered as a potential transport hub so it is argued, it must

be the logical place for more development. This assertion is curious not least because Transport for London (the Strategic Transport Authority) wrote in response to the earlier Draft of the Local Plan that:

- "The area around Crews Hill station has a Public Transport Accessibility Level (PTAL) ranging from only 1a to 1b (on a scale of 1a – 6b, with 6b being the highest), with the wider area recording a PTAL of zero. Crews Hill station is currently served by Great Northern services between Hertford North and Moorgate, with a maximum of three trains per hour in the peak. There are no bus services serving this area. With such a low level of public transport connectivity either current or planned, the development of this area must inevitably be car dependent. The focus for large-scale mixed-use development should be on growth corridors where there is planned investment in the public transport network. TfL recommends the Council look at stations with higher public accessibility levels, for example those near retail parks."
- The above analysis by TfL has not altered.
- Greater infrastructure at Crews Hill is not planned any time soon either by Network Rail or TfL if it took over the line in the future.
- If TfL, whose *raison d'être* is to promote the use of public transport, does not believe the area is suitable for development due to the limited transport infrastructure, then it calls into question the entire plan for Green Belt release at Crews Hill and surrounding areas
- The Crews Hill and Botany Bay areas are served by relatively narrow "B" grade and less country roads which are extremely busy carrying the current population and visitors. They also suffer from traffic jams particularly when Junction 25 of the M25 is closed as people use Junction 24 as an alternative turn off or increasingly since the removal of the hard shoulder between the two junctions, following shunts and more serious accidents. Congestion would increase if the existing roads were left unimproved to cater for an expanded population, visitors and vehicles coming off the M25, making it increasingly difficult for people to get around the area. Such increased congestion would adversely affect pollution levels while doing nothing to mitigate carbon emissions
- Roads such as The Ridgeway and East Lodge Lane would likely have to be widened and converted into dual carriageways to cope with an expanded population which is not planned by national, regional or local government. It would certainly not be supported by current residents either.
- Developing rural and semi-rural areas such as Crews Hill can only result in more traffic, not just for the reasons above, but also because given the proximity of Crews Hill to the M25 and thus access to all of the UK's Motorway network, it's almost axiomatic that the occupiers of the new housing on these proposed sites would have one or more cars per unit, and the now rapid change to electric or other zero emission fuels while addressing pollution will certainly not reduce the demand for vehicles in such locations, with the consequent pressure on road capacity, plainly not foreseen by the draft Plan.

Blue and Green Strategy

- The document states in Chapter 6, paragraph 6.1.5 that Enfield's long-term ambition is to become the greenest borough in London at the cornerstone of London's national park city (as outlined in the Council's recently adopted Blue and Green Strategy)
- The proposals contained within the Draft Local Plan document certainly do not match the statement above as they propose the removal of green spaces.
- Chapter 6, paragraph 6.1.6 says *Development proposals will be expected to deliver improvements to open spaces, sustainable drainage systems, river corridors, green chain links and ecological networks in line with the principles of environmental gain set out in the government's 25 Year Environmental Plan.* It is hard to fathom how building all over Crews Hill Golf Course, Vicarage Farm, the

new Cottages and Holly Hill Farm, land between Camlet Way and Crescent Way and Rammey Marsh will deliver any environmental gain.

- The plans to de-designate large parts of the Green Belt will not assist Enfield becoming London's greenest borough as it will remove large swathes of its greenest parts. The proposals to allow development in the Green Belt will set the borough back in its goal to become London's Greenest Borough.
- The Conservative Group does not support the proposed de-designation of sites within the Green Belt as it would positively impede the goal of making Enfield the "greenest borough in London" which is a key part of the recently adopted Blue and Green Strategy.

Climate Change

- Enfield Council declared a Climate Change Emergency in 2019. The Green Belt in Enfield, including the sites identified for de-designation, provide part of the environmental infrastructure required to help achieve net zero carbon.
- The United Kingdom was the first major country in the world to have written into legislation that it will become carbon neutral by 2050. Enfield Council believes the borough can become carbon neutral by 2040.
- Green Belt land naturally tackles climate change through carbon storage, cooling the "heat island" effect of cities and providing flood protection. The proposals to build on green spaces will therefore make it harder to become carbon neutral by the target date, and for the reasons given above in relation to transport, potentially exacerbate the problem.
- The recent flash flooding due to the impacts of climate change highlights how land such as the Green Belt sites identified for de-designation play a part in our fight against climate change. Sites such as Crews Hill Golf Course and those fronting Enfield Road act as a defence against flooding for the local area. The proposals say little on what would happen in those areas once they are built on.

Leisure

- The Green Belt provides areas in the borough for leisure activity.
- The document states that it would like the Green Belt to be more accessible. However, sites such as Crews Hill Golf Course already provide a leisure activity which can be used by any member of the public as it has a pay and play policy. It has also attracted more people from across the borough since Enfield Council closed Whitewebbs Golf Course which offered a similar facility.
- Sites such as Vicarage Farm and Crews Hill Golf Course have public footpaths through them making them accessible to all. The sites were heavily utilised during the recent COVID-19 lockdowns. The document does not give enough weight to the impact of the pandemic and the use of these sites during the lockdown periods nor any assurances that these public walking facilities would be maintained.
- It is disingenuous to suggest that the Green Belt is only used by affluent western Enfield residents. During pandemic lockdowns the Green Belt was enjoyed by residents from both the east and west of the borough. If it were built on, it would remove valuable amenity spaces for all residents and visitors to enjoy.

Businesses and Agriculture

- The loss of agricultural land proposed in the Draft Local Plan as part of the de-designation of Green Belt represents a serious loss of productive land at a time when the UK needs to invest in agriculture in order to deliver and enhance the necessary food supply. As such this runs contrary to para 174(b) of the recently revised NPPF which states –

*"174. Planning policies and decisions should contribute to and enhance the natural and local environment by:
recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the*

economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

- Businesses such as farms and nurseries are located on many of the Green Belt sites listed for de-designation.
- These businesses also provide employment for local people. The jobs would be lost if the locations were built on for development as proposed in the Draft Local Plan. The proposals would remove major parts of Enfield's agricultural and horticultural industries which would be a loss to the borough and London as a whole and as indicated, would not assist the much-needed drive to improve food production in the post Brexit situation.

Mental wellbeing

- For many people, lockdown brought a new appreciation of nature and what it means for our well-being. During the lockdown periods residents utilised the Green Belt for their exercise. The areas were busy, but due to the size of Enfield's Green Belt it was able to provide safe areas for people to visit.
- In the Foundation-led Coronavirus: Mental Health in the Pandemic Study, among a representative sample of adults in the UK, spending time outdoors has been one of the key factors enabling people to cope with the stress of the Covid-19 pandemic, with 45% of adults saying that visiting green spaces helped them to cope throughout the pandemic.
- Enfield's Green Belt areas were a lifeline for people's mental health, especially those living in overcrowded accommodation and in flats who were able to find some respite in our Green Belt settings.
- Enfield is blessed to have these areas and residents' value them more so now than probably ever before.
- These sites have long been used by people from within and out of the borough, but many more found solace in these spaces during the pandemic. If these areas listed are built on, people regardless of whether they live in the east or the west of the borough will lose the opportunity to use them for walking, exercise and positive mental health.

Tall Buildings

- The Draft Plan appears to suggest that by building on the Green Belt there will be fewer tall buildings, but tall buildings are being built, encouraged and approved as set out below, including on the council's own development site at Meridian Water.

| Height | 'Appropriate locations' |
|------------------|---|
| 26 storeys (78m) | Meridian Water |
| 23 storeys (69m) | Edmonton Green |
| 17 storeys (51m) | Enfield Town station |
| 16 storeys (48m) | Southbury station, Silver Street, Brimsdown |
| 15 storeys (45m) | Cockfosters station |
| 13 storeys (39m) | Palace Gardens Enfield, Southgate Circus |
| 11 storeys (33m) | Enfield Chase station, Palmers Green, Oakwood station |
| 9 storeys (27m) | Arnos Grove |

- The lessons of the 1960s tall buildings have not been learnt as invariably such sites, when used for social housing without individual outside play and amenity space, leads to poor:
 - living conditions
 - health outcomes
 - educational attainment
- Tall buildings placed in low rise areas inevitably impact negatively on the landscape, street scene, homes and lives of those already living there, both visually and environmentally. Where tall buildings are placed in or within sight of conservation areas, listed buildings and the Green Belt there is a significant detrimental impact on the legacy from previous generations; this impact is significant and permanent. This plan demonstrates no recognition of the historic landscape and existing conservation areas. It effectively takes a wrecking ball to the Enfield that residents presently know and value particularly for our Green Belt, conservation areas and market feel to town centres like Enfield Town.
- The Draft Local Plan proposes to allow buildings at Southgate Circus to be 13 storeys high. This is despite the fact that recent planning applications for tall buildings in the area have been robustly opposed by residents. The plans to allow tall buildings at Southgate Circus are not supported and the strength of feeling shown by residents against recent planning applications should have been considered prior to going out to consultation.
- The London Assembly Planning and Regeneration Committee found in its recent COVID-19, Housing Typologies and Design in London review that there is a growing evidence base demonstrating that tall buildings are less sustainable than those which provide a similar quantum of development in other configurations. It particularly believes the development of towers should only happen after robust evidence has been presented about how their social impacts will be mitigated. [2 September 2021, Letter to Councillors, from Andrew Boff AM, Chair of Planning and Regeneration Committee]
- Professor Philip Steadman told the London Assembly Planning and Regeneration about a study conducted by UCL a couple of years ago into tall office buildings, mostly in London that found the increase in storeys from six storeys to 20 doubles the energy intensity per square metre. [2 September 2021, Letter to Councillors, from Andrew Boff AM, Chair of Planning and Regeneration Committee]
- Overall, the Planning and Regeneration Committee at the London Assembly believes that high density housing can be achieved by approaches that are more suitable for families, more in keeping with London's traditional form and are less intrusive on the skyline without encroaching on the Green Belt. [2 September 2021, Letter to Councillors, from Andrew Boff AM, Chair of Planning and Regeneration Committee]

Conservation Areas/Historic Landscape

- The Draft Local Plan, contrary to para 190 of the NPPF, appears to have little or no regard for conservation areas and the historic landscape, this is particularly seen in the proposal for Chase Park where 3,000 new homes are planned to ignore the rich history of Enfield Chase and its historic importance. This would be against both Green Belt Policy, the London Plan and fails to recognize the benefits this space brings to the urban community. Proposals to build tall buildings at Charles Holden's listed underground stations undermining their architectural integrity and changing the historic views of and from the stations is a shocking piece of vandalism which apparently is to be repeated at every station in the borough.
- Conservation areas are impacted by the proposals for tall buildings and the Draft Local Plan makes no attempt to justify the "special circumstances" that need to be demonstrated to achieve such changes when they impact upon a conservation area. For example, a tall building in the middle of the Enfield Town Conservation

Area would impact on the whole area, listed buildings, church, market square and the character of what remains a market town. This is repeated throughout the plan.

Strategic Industrial Land/Industrial land

- The Conservative Group notes with interest that the Draft Local Plan document proposes the de-designation of sites within the Green Belt but fails to put forward any plans to change the use of Strategic Industrial Land and industrial areas of land not designated as SIL. We note the importance of SIL within the London Plan. However, there is more flexibility for land not classified as SIL.
- Enfield's industrial corridor is adjacent to and within the Meridian Water area. It would be sensible to follow Meridian Water and build on brownfield sites along the River Lee/Meridian Way.
- It is surprising that as it is the long-term aim of the Labour Administration to obtain change of use from SIL to residential for certain sites within the Meridian Water area, that de-designation of SIL and industrial sites that are not classified as SIL is not at the heart of this Draft Local Plan.
- We know that if Crossrail 2 were to go ahead the entire Meridian Way/River Lee corridor would be very likely to become available for residential, commercial, and industrial uses, which Enfield Council supports. But Crossrail 2 is uncertain and cannot be relied upon to deliver this much needed regeneration.
- The Labour Administration has simply not done enough to argue the point that this area should be utilised for residential/mixed use development with or without Crossrail 2 as the existing railway line that runs from Liverpool Street is a good service and is better than train lines in the west of the borough including Crews Hill.
- If Crossrail 2 were to happen the whole Local Plan would have to alter.
- The Local Plan document does not put sufficient emphasis on the fact that whilst years ago industrial sites were mainly on one level modern industrial sites no longer follow that model thus freeing up more land. Moreover, the GLA is not against such a policy.
- The area along the River Lee/Meridian Way could provide fantastic waterside living for our current and future residents and already has the infrastructure in place. Instead of pursuing the pointless and detrimental policy of de-designation of Green Belt sites, the Administration should strenuously pursue one that releases non SIL industrial land for mixed use development.

Transport assessment across the plan

- The Integrated Impact Assessment has not set out the reality of the proposals on Enfield's roads.
- The transport appendices state that there will be an increase of 17,755 cars owned in the borough if the chosen option of 25,000 homes is agreed. That equates to 0.7 cars per new dwelling.
- This completely contradicts Policy SP T1: Promoting sustainable transport and the IIA assessment that the plan having a significant positive effect in relation to IIA1: Climate change mitigation because the policy promotes car free or low level of parking provision schemes in the borough, which will be supported by further development of local public transport networks and sustainable modes of travel such as well-designed public realm walking and cycling routes including green chains and links.
- Proposals to improve and increase the transport infrastructure in the borough are barely mentioned in terms of roads. The proposed 0.7 cars per household maybe an aspiration but it will not be the reality.
- The proposed 25,000 plan option if agreed would potentially increase the number of cars by 36,000 as many households own two cars in the borough. TfL has said that the sites proposed for development within the Green Belt would be car dependent and that is why these sites were not supported.

Crematorium

- 6.10 Policy DM BG10: Burial and crematorium spaces proposes Firs Farm Recreation Ground as a site for an additional crematorium.
- The Conservative Group opposes this proposal due to the investment in the Firs Farm Wetlands project, the future plans for improved facilities and the fact that it is a much-used recreation facility.
- The Conservative Group is angered by the fact that Enfield Council staff have been working with the Friends of Firs Farm on future improvement projects for the park whilst at the same time, the Labour Administration creates a Draft Local Plan that proposes to use part of the site for a crematorium. It was very poor that the Friends Group had to hear of the plans from reading the consultation document.

Supermarket Development

- SPTC2 states that the Borough's town centres should be developed to make them vibrant and economically successful hubs. At the same time the draft Local Plan identifies a wide range of car park sites in Palmers Green, Winchmore Hill, Southgate etc for housing development. The draft Plan also identifies a number of supermarket car park sites for housing development. It should be obvious that removing car parking from town centres and supermarkets will kill these areas stone dead and shoppers will simply move to other areas outside Enfield where it is easier to find parking.

Consultation

- The Conservative Group notes that a Local Plan Drop-In consultation event was not held at Town Library.
- The Administration held a consultation event at all hub libraries except Town Library
- Residents who live in central Enfield did not benefit from an opportunity to attend a nearby Local Plan Drop-In consultation event.
- It is telling that residents who live in areas that will be affected by proposals to de-designate sites within the Green Belt had to travel long distances to meet with a representative from Enfield Council to explain the plans face to face.
- When Opposition councillors requested an event at Town Library, the officers refused even though vast areas of central Enfield were without a nearby drop in event.
- The Administration has not written direct to residents in our rural areas to inform them of the Local Plan consultation. Residents who live in these locations do not necessarily receive leaflets via paid for door to door delivery due to difficulties accessing properties.

Conclusion

In conclusion, the Conservative Group opposes the Draft Local Plan. The proposed 25,000 homes option needs to be reassessed considering the impacts of the pandemic, leaving the European Union and the use of older growth projections as part of the drafting process.

We wish to emphasise our opposition to de-designating sites within the Green Belt. Councillors have been inundated with emails/letters and comments by residents who do not favour building on Enfield's Green Belt and countryside. The proposals to remove green space for homes, industrial units and a crematorium make a mockery of the Labour Administration's response to the climate emergency.

The Draft Local Plan appears to suggest that by proposing to build on the Green Belt there will be fewer tall buildings, but tall buildings are being proposed including on the council's own development site at Meridian Water. Planning applications for tall buildings

have not been supported by residents so a major increase in tall buildings would unlikely to be endorsed by the community.

Finally, the jewel in Enfield's crown has always been its mix of town and countryside. It is the reason why many people choose to make Enfield their home. The proposals within the Draft Local Plan put that at huge risk and therefore cannot be supported.