



Saving Enfield's Green Belt

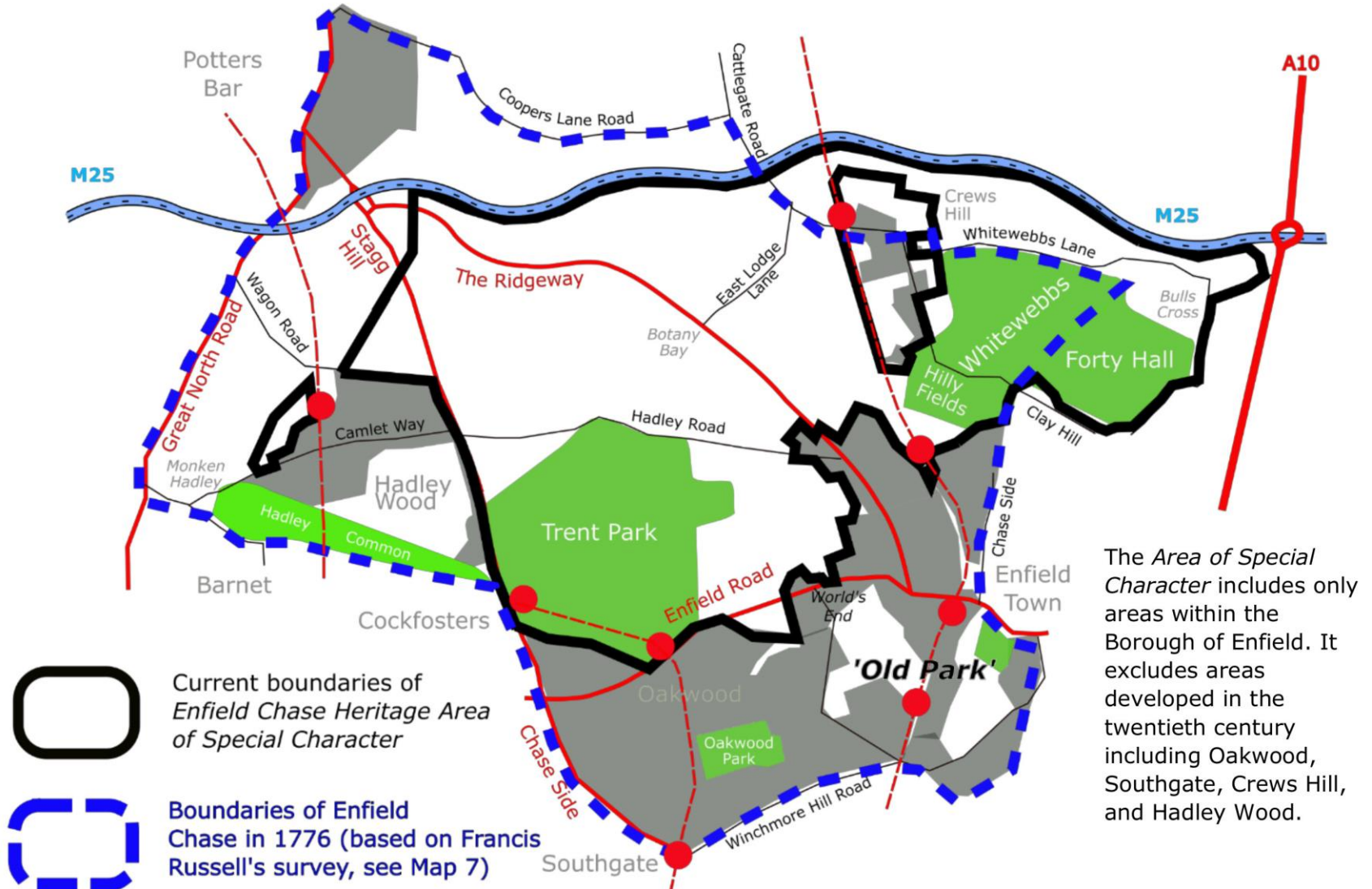
Andrew Lack, The Enfield Society

enfieldsociety.org.uk

Carol Fisk, Enfield RoadWatch

enfieldroadwatch.co.uk

Enfield Chase is the historic remains of a Royal Hunting Ground



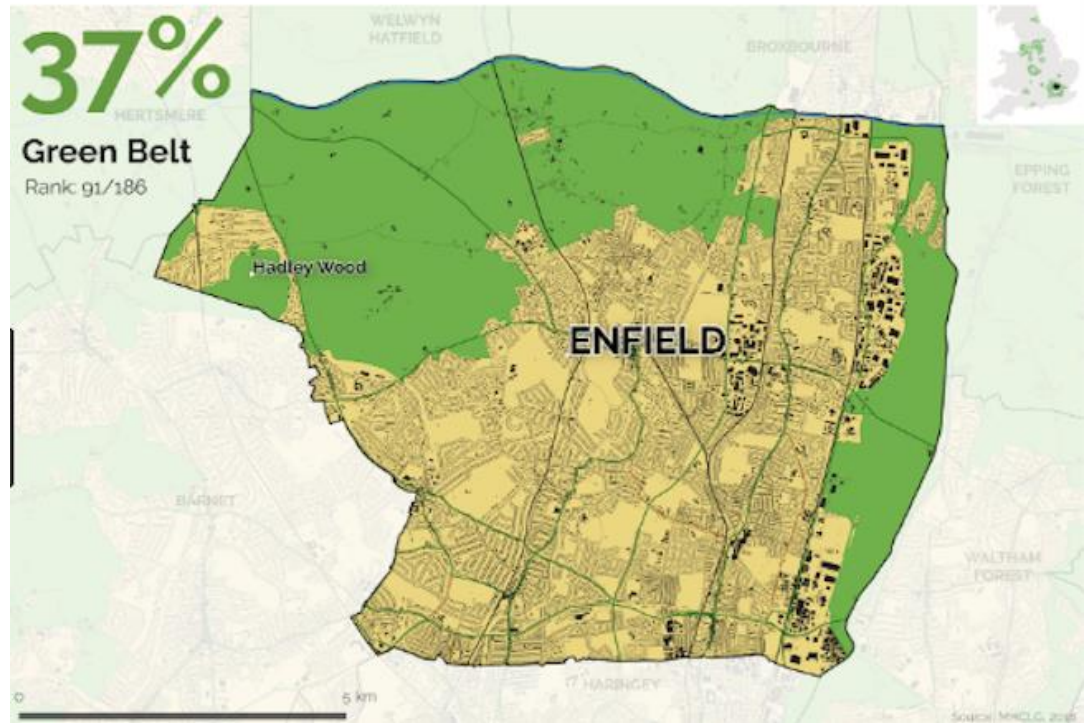
The Chase today gives Enfield its rural character, in the same way as Richmond Park and Hampstead Heath



What we're fighting for

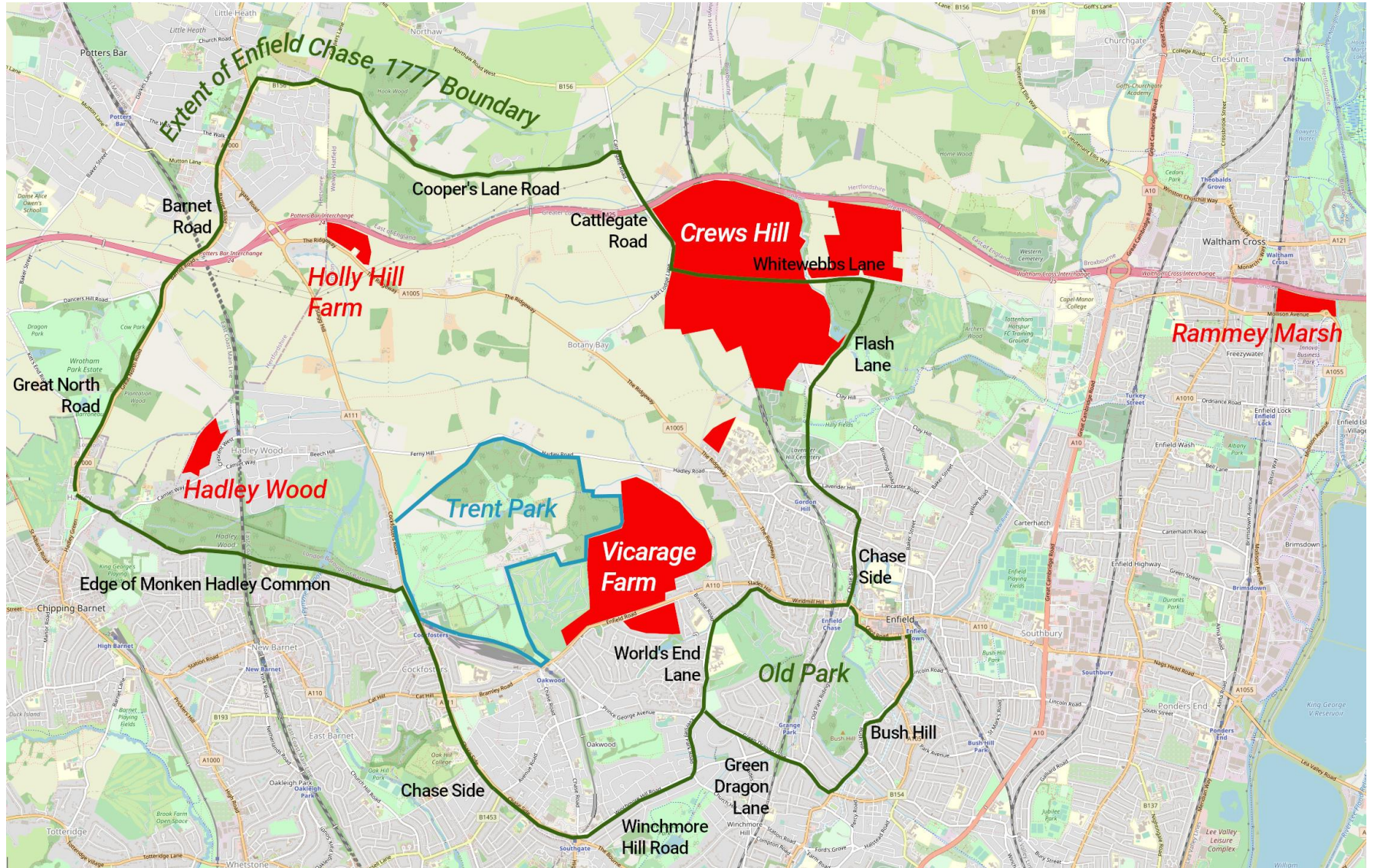
- The London Borough of Enfield is about 37% Green Belt, most of it in the northwest of the borough adjacent to Hertfordshire.
- Much of the Green Belt is owned by the Council and consists of tenanted farms, used mostly for grazing with some arable.
- One large farm, Vicarage Farm, is owned by developer, Comer Homes
- There are also several parks in the Green Belt.
- An extensive area of garden centres, known as Crews Hill, also lies within the Green Belt under permitted horticultural use.
- Most of the Green Belt is accessible via a network of footpaths.

Enfield



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Areas in red show the proposed development in Enfield's Green Belt



What is a Local Plan?

- Every Local Authority must have a Local Development Plan (LDP)
- The Local Plan outlines future development in a local authority area, including how to use land, build homes, and create jobs.
- The plan is created by a local planning authority in consultation with the community.
- The plan is developed in stages with two or more public consultations, known as Regulation 18 and Regulation 19, along the way.



The banner features a background of white icons on a light green field, including symbols for zero waste, houses, trees, and recycling. A red curved line is at the bottom. The text reads: **Enfield's New LOCAL PLAN 2019-2041**, REGULATION 19 - for consultation, MARCH 2024. To the right are three illustrations: a modern apartment building, a street scene with a bicycle, and a person walking on a path with a tree.

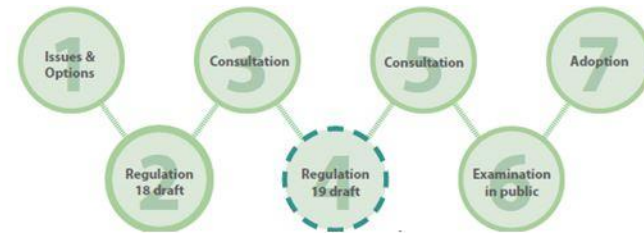
www.enfield.gov.uk

ENFIELD
Council 



Enfield's Local Plan Timeline

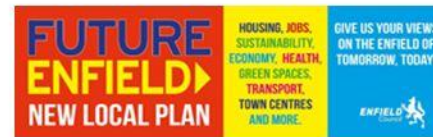
- The process started in **2016** with an Issues and Options consultation. **82%** of respondents were against building on the Green Belt.
- A second Issues and Options consultation was held in **2018**.
- In **2021**, a more detailed draft plan was released for the **Regulation 18** consultation.
- We were surprised by the sudden inclusion of Vicarage Farm, 140 hectares of rolling Green Belt, a remnant of the historic Enfield Chase.



Issues and options consultation 2016

Issues and options consultation 2018

Preferred approaches Regulation 18 consultation 2021



Draft Local Plan Regulation 19 consultation 2024

The Local Plan documents were submitted to the Secretary of State for examination on Tuesday 6 August 2024

Enfield Local Plan (Regulation 24) 2024 – Examination in Public – Stage 1 Hearings - January 22 – 20, 2025

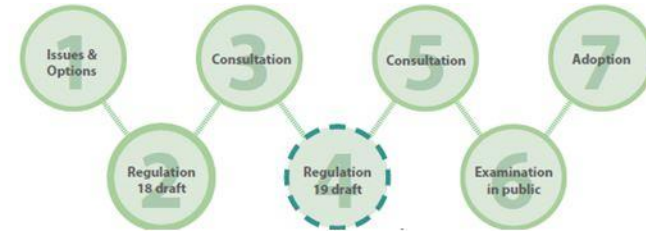


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Enfield's Local Plan Timeline

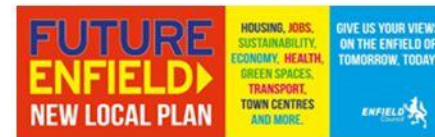
- **98%** of a random sample of responses were against building on the Green Belt.
- The 2021 housing target was **25,000** homes with approx. **7,000** on Green Belt at Vicarage Farm and Crews Hill.
- **2023-24** saw the **Regulation 19** consultation with a new housing target of **32,800** – still with approx. **7,000** on Green Belt. [
- Evidently they had found more brownfield in between!



Issues and options consultation 2016

Issues and options consultation 2018

Preferred approaches Regulation 18 consultation 2021



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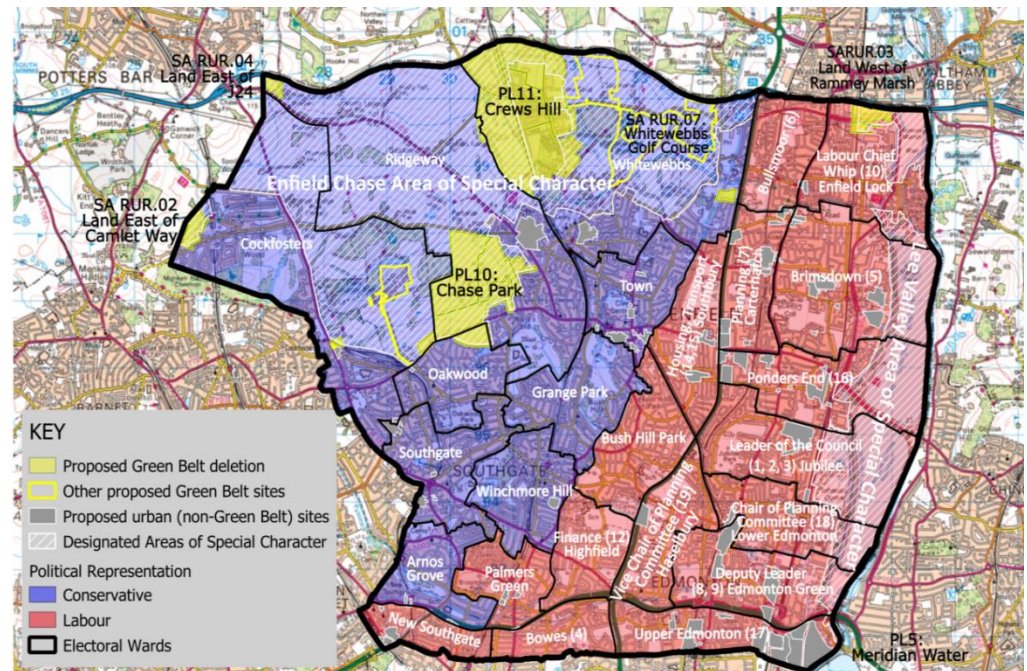


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The political dimension

- The borough is divided into two very different halves.
- The east, made up mostly of Edmonton, is more densely-populated, more deprived and contains most of the brownfield.
- It is also represented by the majority Labour party.
- The west, formerly Enfield Chase and Southgate, is more affluent and contains most of the Green Belt.
- It is strongly Conservative.
- **Nearly all the Green Belt allocations are in Wards represented by the opposition Conservative councillors.**



How can a Local Plan be challenged?

- The **Regulation 19 consultation** is the first time during the Local Plan process that representations/objections are considered by an independent expert outside the Local Authority.
- After the Regulation 19 consultation, the plan is submitted to the Secretary of State and an independent government Planning Inspector is appointed.
- The Local Authority **must** provide the Inspector with **every** representation submitted within the consultation period.
- However, representations and objections must relate back to regional and national planning policy, so it's a technical consultation and expert planning advice is needed.

Part B: Please use a separate sheet for each representation

2. Full Name or Organisation:

PLEASE NOTE: DO NOT INCLUDE OTHER PERSONAL DETAILS SUCH AS YOUR ADDRESS OR OTHER IDENTIFICATION IN THE SECTIONS BELOW OR YOUR RESPONSE WILL BE INVALID

3. To which part of the Local Plan does this representation relate?

PLEASE NOTE: THIS QUESTION IS REQUIRED AND SHOULD BE ANSWERED FOR EACH SEPARATE SHEET PROVIDED.

Policy number e.g. TC3	Paragraph number in policy	Site allocation reference e.g. SA1.1

or please mark x instead if your response is not specific / relates to the whole plan.

4. Do you consider the Local Plan is: please mark your response marking x in a box

4.(A) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(B) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>



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How can a Local Plan be challenged?

The Inspector will decide if the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is '**sound**'.

To be found **sound** the plan must be:

positively prepared [Is it making a genuine effort to meet development needs?]

effective [Is it likely to meet development needs?]

justified [Does the evidence agree, having considered sensible alternative strategies] and

consistent with the National Planning Policy Framework [NPPF] and, in London, the London Plan

A plan can be challenged on any of these technical issues and objections are discussed at the examination hearing sessions.



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How we challenged the Local Plan

- Local interest groups collaborated throughout the Local Plan process.
- The Enfield Society and Enfield RoadWatch were particularly active at each stage.
- Leading up to Regulation 19, several local groups collaborated on a petition under the umbrella of **Action for Enfield's Future**.
- We asked the Council to allow sufficient time for people – including the councillors - to read the many thousands of pages of the local plan – and for there to be a council debate and public vote before moving to the Regulation 19 consultation.
- Over 4,000 people signed the petition!
- As a result the draft local plan was pre-published for 12 weeks before the official consultation period. This was important.

ENFIELD COUNCIL IS DRAWING UP THE LOCAL PLAN

This is a crucial document that will affect all of our lives in Enfield from now to 2039. It will affect:

- What gets built where - new homes, tower blocks, industry, shopping facilities, roads, footpaths and cycle lanes.
- Quality of life - jobs, housing, air quality, open spaces, parks and sports & recreation facilities.
- Climate change - managing risks of pollution, flooding and overheating.
- What gets preserved for future generations - historic buildings & landscapes, countryside, wildlife and biodiversity.
- Green Belt

#DEBATE ENFIELD'S LOCAL PLAN

Our petition requests that Enfield Council honours its promise of 9 June 2021, and brings its revised Local Plan to the Council for a full debate and vote before the plan is submitted to the Government's National Planning Inspectorate.

HAVE YOUR SAY, SIGN THE PETITION BEFORE JULY 31st

Search for **Enfield Petitions** on google or go to these sites for more information and links to the petition.

- <https://enfieldroadwatch.co.uk/>
- <https://enfieldsociety.org.uk/2022/06/10/local-groups-petition-council-for-local-plan-debate/>
- <https://whitewebbspark.org.uk/enfield-local-plan-petition/>

The petition's aim is to make sure that we and our councillors have a realistic opportunity to read the plan. We can then feed back to them before they vote on the plan in a roll call. **BUT we need at least 3,124 signatures** to present the petition to the Council, so every signature counts. To find, and sign, the petition scan the QR code on your smartphone.



WHO'S LEADING THE CAMPAIGN TO SIGN THE PETITION?

Lots of people are concerned about the Local Plan and how it gets approval. Familiar names like Enfield RoadWatch, EnCaf, The Enfield Society, Friends of Whitewebbs and Better Homes Enfield have joined together with others to organise the petition to ensure the Council gives meaningful consultation to the people of Enfield.

We're calling ourselves "**Action for Enfield's Future**". We're non-political and inclusive. Please support us by signing the petition - and displaying the poster overleaf in your window or on a notice board wherever you can.



Enfield RoadWatch



How we challenged the Local Plan

- Posters
- Leaflets
- Banners
- Social media
- e-mail

Enfield Local Plan

Six weeks to save our Green Belt



Get the facts...
Respond to Enfield's Local Plan



Enfield RoadWatch

The Enfield Society and Enfield RoadWatch: enfieldsociety.org.uk/localplan

How we challenged the Local Plan

We created a bespoke PHP form which “simplified” making comments at Regulation-19

Form used: 4753

Representations: 8151

People submitting: 3416

Policy PL10: 2187

Policy PL11: 1946

Policy SA10.1: 970

Policy DE6 AREA 2: 772

Policy DE6 AREA 1: 326

Policy SA RUR.04: 314

Policy SA RUR.02: 294

Policy SA URB.03: 280

Policy DE6 AREA 8: 277

Policy DE6 AREA 6: 258

```
66 } else {
67 > > savePartB();
68 > > }
69 > > }
70 > > break;
71 > > case "replaceB":
72 > > $polnum = strtoupper( $_POST['PolicyNumber'] );
73 > > //echo "<p>Replacing policy $polnum</p>";
74 > > // find the policy number in the SESSION
75 > > $found_pol = 0;
76 > > $partBindex = 0;
77 > > foreach( $_SESSION['PartB'] as $pol ) {
78 > > > if( $pol[0] == $polnum ) {
79 > > > > $found_pol++;
80 > > > > break;
81 > > > > }
82 > > > > $partBindex++;
83 > > > > }
84 > > if( $found_pol == 0 ) {
85 > > > > echo "<p>Fatal error: cannot located policy \"\$polnum\" in the SESSION</p>";
86 > > > > } else {
87 > > > > $newB = array();
88 > > > > array_push( $newB, $pol[0] );
89 > > > > array_push( $newB, $_POST['PolicyComment'] );
90 > > > > array_push( $newB, $_POST['participate'] );
91 > > > > array_push( $newB, $_POST['Reason'] );
92 > > > > // replace PartB
93 > > > > //echo "<p>Must replace PartB array index $partBindex with", var_dump( $newB ), "</p>";
94 > > > > $_SESSION['PartB'][$partBindex] = $newB;
95 > > > > }
96 > > > > break;
97 > > > > case "removeB" :
98 > > > > $polnum = strtoupper( $_POST['PolicyNumber'] );
99 > > > > $yesno = $_POST['deleteYN'];
100 > > > > //echo "<p>Request delete policy $polnum</p>";
101 > > > > // find the policy number in the SESSION
102 > > > > $found_pol = 0;
103 > > > > $partBindex = 0;
104 > > > > foreach( $_SESSION['PartB'] as $pol ) {
105 > > > > > if( $pol[0] == $polnum ) {
106 > > > > > > $found_pol++;
107 > > > > > > break;
108 > > > > > > }
109 > > > > > > $partBindex++;
110 > > > > > > }
111 > > > > if( $found_pol == 0 ) {
112 > > > > > > echo "<p>Fatal error: cannot located policy \"\$polnum\" in the SESSION</p>";
113 > > > > > > } else {
114 > > > > > > if( $yesno == "yes" ) {
115 > > > > > > > //echo "<p>SESSION before remove:" var_dump( $_SESSION['PartB'] ); "</p>";
```

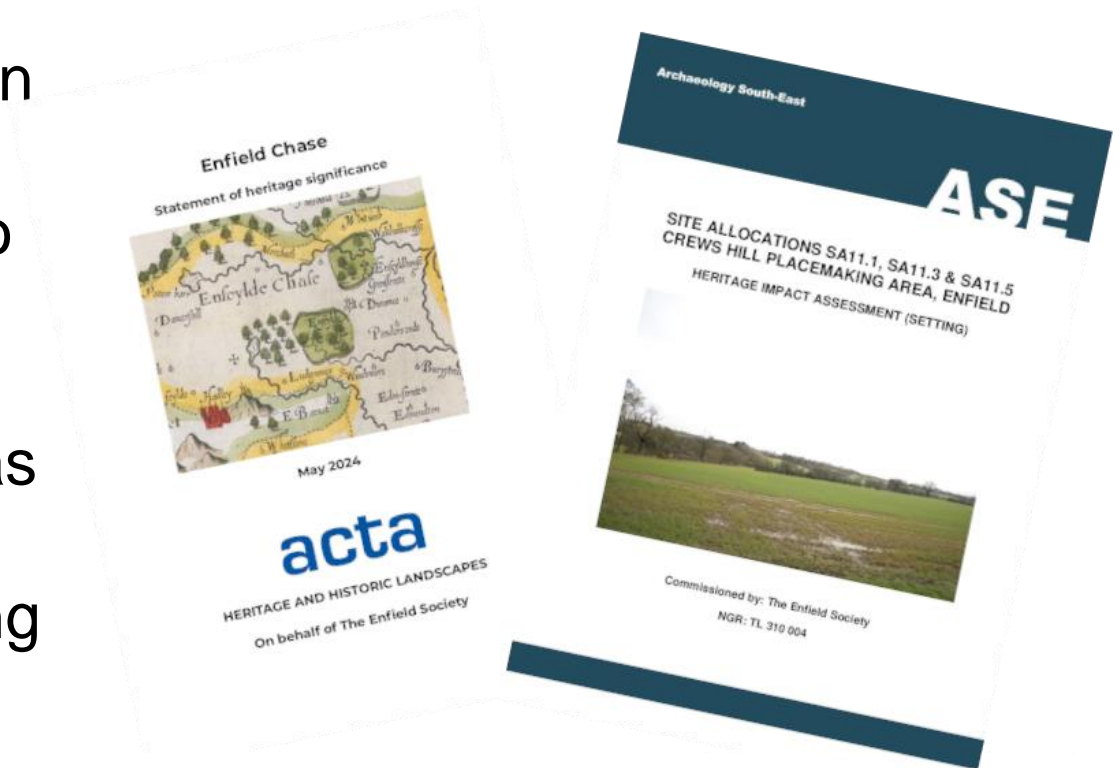


Enfield RoadWatch



How we challenged the Local Plan

BUT challenging a Plan is complicated
We have been lucky to have had professional advice at no cost
The Enfield Society has spent over £30,000 on consultants and printing



Viewpoint 3: Hadley Road

How we challenged the Local Plan

- The representations were followed up by hearing statements from each group.
- The hearing statements responded to specific questions from the Planning Inspector
- With expert help, we were able to reinforce and expand on the arguments made in our representations.
- And we attended the hearing sessions, where we were able to argue these points in person.
- The GLA and TfL contributions were confusing. More on these later.

Stage 1 Hearing Statements

Matter 1

- [London Borough of Enfield Council \(E7.M1\) \(PDF, 570.33 KB\)](#)
- [Berkeley Homes/Lichfields \(H1\) \(PDF, 152.87 KB\)](#)
- [Better Homes Enfield \(H63\) \(PDF, 211.25 KB\)](#)
- [Comer Homes/Savills \(H2\) \(PDF, 94.05 KB\)](#)
- [David Harbott \(H3\) \(PDF, 137.27 KB\)](#)
- [EnCaf Land Use Working Group \(H4\) \(PDF, 267.74 KB\)](#)
- [Enfield Over 50's Forum \(H5\) \(PDF, 1466.66 KB\)](#)
- [Enfield Road Watch \(H6\) \(PDF, 11156.55 KB\)](#)
- [Enfield Society \(H7\) \(PDF, 4203.63 KB\)](#)
- [Friends of Trent Country Park, Trent Park Conservation Committee and Western Enfield Residents Association \(H8\) \(PDF, 5874.42 KB\)](#)
- [Historic England \(H9\) \(PDF, 96.43 KB\)](#)
- [Hadley Wood Neighbourhood Planning Forum \(H10\) \(PDF, 282.8 KB\)](#)



Enfield RoadWatch



What was challenged?

Numerous issues were identified in the draft Local Plan and noted by the Inspector. Here are some highlights:

Soundness and Green Belt release

- The plan is being examined under the 2023 NPPF and the current London Plan so any Green Belt release requires proof of Exceptional Circumstances.
- The council is justifying the release by using a capacity housing target, which considerably exceeds the London Plan target.
- They are also claiming that they have included all available brownfield sites. This is being challenged with good evidence.
- The two largest Green Belt 'Placemaking Areas' have issues with their viability evidence and, in particular, with their sustainability. They are likely to be car-dependent and meeting the affordable housing targets is questionable.



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What was challenged?

Legal and Procedural - Public Engagement.

The plan was submitted in early August but, by late January when the hearings started, there were still omissions from the representation database and errors in the consultation statement, which summarises the comments.

Duty to Cooperate

Local Authorities are required to cooperate with neighbouring authorities and statutory consultees on issues such as housing numbers and sites for Gypsies and Travellers. There were gaps in the evidence trail showing how the Council had fulfilled this requirement.

Enfield Local Plan (Regulation 24) 2024 – Examination in Public

We've added a .csv file for people who don't use MS Excel. Since .csv files cannot include clickable links because they don't support formatting, we're also providing an .xls version.

View the Regulation 19 Enfield Local Plan consultation responses individually, or a summary through the:

- [representation database \(CSV, 12698.54 KB\)](#) - last updated: 15 Jan 2025 5:32pm
- [representation database \(XLSX, 1542.44 KB\)](#) - last updated: 15 Jan 2025 5:32pm

The update on 15 January 2024 includes the upload of 117 new representations (reference numbers 00385 to 00722), and the correction of one existing representation. These changes were reported by the Enfield Society.



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The GLA and TfL contributions. What do they mean for the future?

- TfL and the GLA both consider that the proposed Green Belt release makes the draft plan unsound based on **current** London Plan policies.
- However, in their hearing statement, acknowledging the new NPPF and higher housing targets, TfL suggested releasing **even more** of Enfield's Green Belt for **even higher density** development because it is close to two tube stations.
- This would include a large area of Trent Country Park – inside a conservation area and including rare acid grassland habitat.
- Does this mean that any London parks near public transport will be at risk? How about the Royal Parks?

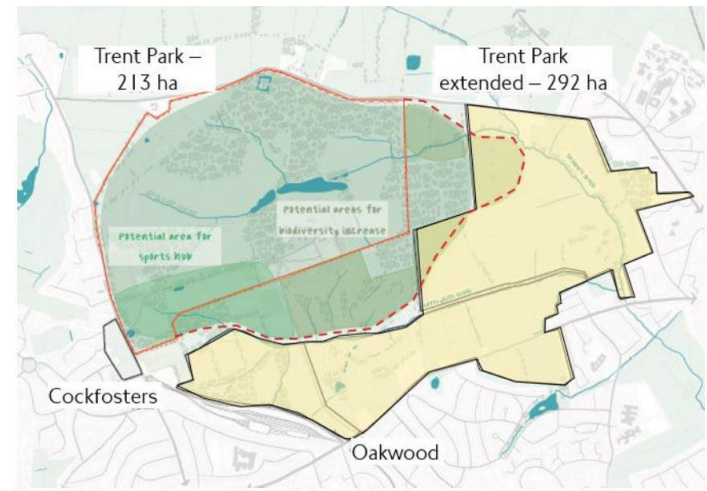


Figure 4: Potential area of Green Belt and development considering land near Oakwood and Cockfoster stations



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The GLA and TfL contributions. What do they mean for the future?

- A delegated statement from the Mayor reinforced the TfL hearing statement.
- It acknowledged the plan's unsoundness under the current London Plan, but two of the proposed remedies were to release the larger area of Green Belt or to build an Area Action Plan into the local plan, working towards the same end.
- Quote: *the rationale for looking at locations well-served by public transport first is that they give more 'bang for your buck' or more homes for the amount of green belt released and therefore a greater contribution towards meeting London's mandatory, nationally-established housing need.*
- We continued to argue that releasing Green Belt in Enfield before the Mayor's London-wide Green Belt review would be premature.
- The Inspector confirmed that he is examining the plan as submitted and not the additional releases – **at this point.**



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The Inspector's Stage 1 letter

- We are now midway through examination with Stage 2 likely to happen in May/ June.
- The Inspector is asking for more evidence on several issues by March 31.
- He has questions about Duty to Cooperate, Engagement, the housing requirement, viability, employment land, site selection and more.
- Basically, the letter holds the Council to account and puts them on notice.
- **He is reserving judgement on the soundness issue.**
- He also questions whether the plan policies as written would allow for the Spurs women's training academy to be built on Whitewebbs Park.



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Questions?

