

Enfield Local Plan Consultation

Objection to the Enfield Draft Local Plan of June 2021

By

The Directors and 553 Members of

Crews Hill Golf Club

August 2021

Crews Hill Golf Club (CHGC) wishes to register its objection to the London Borough of Enfield's (LBE) Draft Local Plan (PLAN) and specifically:

PL9 which is contained in section 3.9 "Crews Hill" on pages 75 to 80 (inclusive).

CHGC has 553no members (at 16th August 2021) and makes itself open to members of the public to book and play in accordance with the requirements of its lease with LBE.

Of CHGC members around 75% live in the LBE area. The Club provides highly regarded opportunities to walk and enjoy leisure and sports time within well maintained Green Belt land.

We are losing Golf Courses everywhere and during the recent lease offering to outside interests by the LBE of Whitewebbs Park (Golf Course and Woodlands), the LBE closed Whitewebbs Golf Course and stated in their publicity that CHGC was a place where those golfers displaced by the closure could play golf. So it begs the question, where is the logic of LBE using CHGC to enhance their reasons for selling-off the lease at Whitewebbs then in this PLAN trying to remove the same facility upon which they rely?

As the Council owns the freehold of the land at Whitewebbs Park, why have they chosen to offer a 25 year lease for sale on all of the Park land including 43.05 hectares of Golf Course which is now fully closed? The LBE are seeking payment from Private interested parties and not considering building homes, why? They appear to be very close to a deal with Tottenham Hotspur plc whose training facilities adjoin Whitewebbs Park. I smacks of serious double standards when they could have included this land in their PLAN to build many homes. We at CHGC would stress we are totally against any such development within the Green Belt but the question must be asked of the LBE - why have they not included this within the PLAN if they truly feel they need Green Belt land for housing?

In a report commissioned by the LBE with Land Use Consultants (LUC) "*Review of Sites of Importance for Nature*" initially drafted 6th November 2020 and issued as a Final Report on 1st April 2021, CHGC is noted as a Borough Level Site of Importance for Nature Conservation (SINC) with a recommendation to be Upgraded from Borough to Metropolitan SINC as:

“The site supports unique relict grassland habitat which has previously been considered to be one of the best examples in the borough and is of distinct value in London. This habitat is particularly rare in London and is considered irreplaceable.

Given the size and location of the site Crews Hill Golf Course is considered to be of considerable strategic value in the north of the borough.

In addition, the ridge and furrow indicate the historical nature and value of the site.

Due to the value of this grassland habitat present, as well as the ecological importance of the location, it is considered that this site should be upgraded to a metropolitan SINC site.”

Unbelievably, the LBE draft PLAN proposes building houses on CHGC, an area of Green Belt land which is said by the LUC report to be:

“ unique rare irreplaceable of considerable strategic value of historical nature and value and having ecological importance” .

To propose building houses on the CHGC land is therefore utter madness and goes against professional advice given to them by LUC.

Metropolitan and Borough SINC sites as noted within this LUC report are said to be of the highest priority for protection: the LBE should take note of this.

The LBE are and any Inspector will be aware that Green Belt land is protected under the National Planning Policy Framework (NPPF). CHGC site is a Borough SINC with proposal to be raised to Metropolitan status, it lies within the protected Green Belt and provides sports and leisure facilities.

CHGC provides access to our Green Belt Countryside for all:-

- To long established public footpaths through the golf course lands,
- To the Course lands for the Public and Members,
- To hundreds of large and specimen trees, shrubs and unique grasslands helping in the fight against climate change.
- To beautiful views across this irreplaceable countryside

To destroy this for housing-led development would be an act of pure vandalism and would stand against all National, London and Local Policies. The Mayor of London is completely opposed to any use of Green Belt land for development and has already voiced his stated view and trusts that any appointed Inspector will fully take his views and objections on-board during their review of the LBE’s PLAN.

The London Plan dated March 2021 states:

The London Mayor (Sadiq Khan) strongly supports the continued protection of London's Green Belt. The NPPF provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. London's Green Belt makes up 22 per cent of London's land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for recreation. It also provides the vital function of containing the further expansion of built development. This has helped to drive the re-use and intensification of London's previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment. Brownfield sites may cost more to develop as over the years these sites have been allowed to pollute the land upon which they stand – this remediation and clean-up of such sites is essential and we have a responsibility to do this to improve our environment.

Openness and permanence are essential characteristics of the Green Belt, but, despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and climate resilience. The [London] Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt.

In the draft LBE PLAN, Figure 3.9 sets out the LBE "place making vision". This shows substantial areas of Green Belt and Metropolitan Open Land (MOL) being destroyed for housing-led schemes throughout the Borough but with an emphasis to the North West of Enfield including Crews Hill & "Chase Park".

As already stated, Green Belt land is protected from development by the NPPF. NPPF Section 13 covers Green Belt land and the whole of this section is relevant. Paragraph 133 which states that *"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*.

The NPPF at para. 141 goes on to state *"local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land"*

The Inspector should accept that CHGC provides a perfect example of a beneficial use within the Green Belt, providing outdoor sport and recreation for the local community which was established in 1916. CHGC is registered as a Community Amateur Sports Club (CASC) member. The lands are accessible to the public and are extensively used and enjoyed by all.

Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries,

having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

Paragraph 143 and 144 state that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances...”*

Therefore, it is an absolute precedent that the LBE, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account whether their stated strategy:

- a. makes as much use as possible of suitable brownfield sites and underutilised land;
- b. optimises the density of development in line with the policies in chapter 11 of the NPPF, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

Taking into account the requirements of the NPPF, it is our view that the LBE have failed in the drafting of the PLAN to make as much use as possible of other, available, useable sites.

As evidence to this, we attach a document titled **“Space to Build, Enfield”** dated January 2019 and compiled by:

Enfield RoadWatch, The Enfield Society and CPRE London. ([Space Survey](#))

This Space Survey maybe 2 years old but is still current and a detailed and in depth report of the entire Borough of Enfield, ward by ward, to establish a list of sites which could provide space to build without the need to use Green Belt land. The sites listed currently make poor use of space and which could be intensified and put to better use. These range from some very large sites to hundreds of ‘micro’ sites. In total this Survey details that over 37,000 homes could be built on these sites, more than satisfying the numbers stated as needed within the PLAN.

Within the Survey, a document has been created for each of the 21 wards in Enfield which lists and provides images of each and every site and for completeness the sites are also all listed in a spreadsheet.

Sites identified within this Space Survey are not properly considered within the PLAN. The Space Survey shows many other options are available with existing and more accessible, transport served areas and it forms a powerful case for the LBE to be more thorough in their search for suitable sites for housing-led and possible further industrial development in urban areas without the need to use any Green Belt land.

CHGC forms a vitally important part of the Green Belt in the North of the Borough. However, within the PLAN at PL9 - Crews Hill, pages 75 to 80, CHGC is never actually mentioned by name in the text. Why is that? It takes closer examination of the PLAN document to see that it is affected in a major way. Within the PLAN at Figure 3.9 titled 'Rural Enfield Place making Vision' (page 71) shows approximately 80% of the 109 acres of CHGC being proposed as an *"Indicative location for Housing-Led areas – Crews Hill.."*

Figure 3.10 titled 'Crews Hill concept plan' makes no real sense to ourselves at CHGC as there is no legend to explain the marking and philosophy behind this so called 'concept plan'. Are we supposed to guess? Surely that is not the point of the PLAN document. It should be providing clear and understandable draft proposals.

To confirm, the LBE have made no approach to CHGC regarding the PLAN. We have only had to take information from the PLAN document itself. We are tenants of the LBE with 30 years & 8 months left on our Lease (at 22nd August 2021) and the Lease has no break clause – so you think the LBE would have had the decency to at least inform us of their PLAN in advance.

The LBE are and any Inspector will be aware that within the PLAN, the LBE make many references to the London National Park City as some sort of reason for the use of Green Belt land, such as CHGC, for development.

National Park City Foundation on 14th July 2021 wrote a letter (copy attached) to LBE Council leader Nesil Caliskan (copied to all councillors) heavily criticising the way the council had used the charity's London National Park City (LNPC) concept as "a bargaining chip to justify loss of Green Belt".

The LBE has apparently, via the Press, denied claims it used the name of a London environmental project to "mislead" people about its Green Belt homebuilding plans.

The charity's chair Paul de Zylva and founder Daniel Raven-Ellison claimed the LBE had "misread" LNPC as a project only focused on parks and green spaces rather than the whole of London. They wrote: *"It is therefore misleading for Enfield [Council] to refer to London National Park City in writing or verbally as part of justifying its proposals for the loss of Green Belt."*

LNPC is mentioned several times in the PLAN, published in June 2021. The PLAN includes a new policy called *"Rural Enfield – a leading destination in the London National Park City"* which sets out plans for placing part of the borough under the LNPC banner *"to bring many sustainable rural activities together to create a unique and exemplary destination"* and adding that it *"has the potential to achieve a net increase of 25% green cover in Enfield"*.

LNPC is also mentioned in a section of the PLAN outlining how 3,000 homes could be built on current Green Belt land at Crews Hill. It states: *"In order to support its emergence as a gateway to the London National Park City and the green and rural north of Enfield for new*

and existing residents, development at Crews Hill should incorporate high-quality public realm and green links to surrounding landscapes.”

In their letter to Cllr Caliskan, Paul de Zylva and Daniel Raven-Ellison wrote: *“Serious application of London National Park City thinking can and should lead elected members, officers and others to make better decisions, but it cannot make up for political decisions which require the loss of green space.*

“Enfield and all local authorities in London should be examining the entire urban fabric and avoid using National Park City as a bargaining chip to justify loss of Green Belt and green space.”

It would appear that the LBE is somewhat in ‘denial’ over its use of the LNPC as a reason for the loss of Green Belt land. As at mid-August 2021 Paul de Zylva told the *Enfield Dispatch* (local free paper) that he had yet to receive a reply from the LBE. The LNPC charity’s chair said his *“door was open”* and added: *“We don’t have any problem with Enfield Council mentioning London National Park City but we don’t think it is right that it should be used as part of making the case to erode something [Green Belt] we don’t think should be eroded.*

“It is there in black and white – it’s interesting if they (LBE) have rejected it [the letter from the National Park City Foundation] before speaking to us. I suspect they need to read their own policies.”

CHGC totally agree with Carol Fisk, from the Enfield Road Watch group who are campaigning to protect the Green Belt, when she commented that the row between the council (LBE) and National Park City Foundation was *“symptomatic of the shoddy reasoning behind the plan”*.

As an important background, apparently a LBE Council spokesperson did issue a statement denying this was how LNPC had been used by the council in its Local Plan, saying Enfield Council is a keen supporter of the National Park City concept, LBE rejected any suggestion they had linked the National Park City concept with the draft Plan preferred option to release a limited section of the Green Belt having made every effort to look at brownfield first.

Any appointed Inspector will be aware from all the evidence provided, that the LBE’s draft PLAN has been shown by the Space Survey to have ignored large developable areas of Brownfield and under-utilised areas within the Borough. There is sufficient urban land available within the Borough and the LBE’s own lack of action in moving the vast Meridian Water site forward at an earlier stage has compounded their housing numbers problem.

LBE goes on to say that the PLAN, *“... includes transforming many largely forgotten and neglected rural parts of the borough into accessible and vibrant destinations for Enfield’s residents, where they can enjoy nature, recreation, sporting excellence and eco-tourism”*. By this statement it is untrue to say these areas are forgotten, they are not [proof positive by their use].

The Inspector must decide why the LBE feel that by the removal of areas of established, irreplaceable Green Belt land which currently provides nature, recreation, sporting facilities and climate protection from nature itself, the same can be provided by allowing development of the land in such a way as to increase pollution from increased traffic and occupation, remove nature at its best and to take away sporting and recreational facilities which are available to all and extensively used by the general public. Again, this just does not make any sense.

The LBE make a serious misjudgement by suggesting available urban areas do not have supporting infrastructure – the infrastructure is already in place, there will be requirements for upgrading yes but these areas provide a far superior option than trying to build new settlements in remote Green Belt areas which in truth will not provide affordable housing and do not have the services nor transport infrastructure which are essential.

The LBE has stated this means “..... a stark choice between packing people into small units in dense towers with a lack of access to open space and supporting infrastructure, or using a small amount of rural areas for high-quality affordable housing with access to gardens and extensive public space.” If this were really the case, we would point any Inspector to examine why has LBE granted permission for a 29 storey housing tower to be built at the Colosseum Retail Park at the junction of the main A10 and Southbury Road?

On this very issue, Alice Roberts the Head of Campaigns at CPRE London, sent an email to Cllr. Caliskan Leader of Enfield Council on 21st July 2021 and we copy this herewith, in full, as it raises many valid matters and backs-up much of the evidence we have provided in our objection, she wrote:

Alice Roberts 21 July 2021 at 10:29

To: "cllr.nesil.caliskan@enfield.gov.uk" Cc: Carol Fisk - Enfield RoadWatch Action Group , John Sadler, Neil Sinden , "joanne.mccartney@london.gov.uk"

Dear Cllr Caliskan,

“Packing people into small units in dense towers” comment in Enfield Dispatch

We are writing to ask the council to retract comments made by Enfield Council in yesterday’s Enfield Dispatch article where a council spokesperson is quoted as saying “insufficient urban land means a stark choice between packing people into small units in dense towers with a lack of access to open space and supporting infrastructure, or using a small amount of rural areas for high-quality affordable housing with access to gardens and extensive public space” because this presents a false choice using emotive and inflammatory language which appears designed to prejudice consultation responses.

It is the strong opinion of ourselves, and many Enfield and London stakeholders, based on carefully collated evidence and data, that no such ‘stark choice’ exists:

*There is enough brownfield land in Enfield to build enough new homes at appropriate density (not packing people into small units in dense towers) and provide for other development needs
Green Belt developments do not deliver affordable housing:*

a recent CPRE report showed the average percentage of all new housing in the Metropolitan (London) Green Belt that was classed 'affordable' is 7% for the most recent year data was collected

'Access to open space and supporting infrastructure' must – and can – be planned wherever housing development takes place: the implication that it is only possible to provide 'open space and supporting infrastructure' in a rural setting is false. In fact, unless new shops, schools, surgeries and bus routes are provided, residents in new Green Belt developments would need to travel by car to reach existing amenities elsewhere in Enfield.

Developments in urban settings, on the other hand, can take advantage of existing infrastructure like sewers, electricity mains, buses and shops; other supporting infrastructure can be provided as part of the development; and people can live close to jobs and amenities thereby reducing the need to travel. And derelict green space can be brought back into use as we have shown in relation to land to the east of Meridian Water.

The statement fails to mention the lack of supporting transport infrastructure in Green Belt developments where evidence shows the vast majority of trips will be made by car, whereas in urban settings homes can be built 'car free' or using car share schemes, so reducing congestion and pollution and enabling people to adopt healthy lifestyles – using public transport, walking and cycling to travel (a central tenet of the London Mayor's Transport Strategy and the London Plan). More generally, this statement does not mention the negative impact of building on London's Green Belt or the critical role London's Green Belt is increasingly playing in managing the climate and nature crises, and providing local food growing opportunities.

As you know, it is the council's duty to investigate brownfield opportunities and present evidence via the Local Plan Development process to make a case for land allocation. At a minimum, given there are a large number of well-informed and well-respected stakeholders who believe there is no need to build on Enfield's Green Belt, and that doing so would in fact be the worst possible option, we believe the council should be giving brownfield options more serious consideration.

Instead it has put forward its own opinion publicly, in a way which is itself prejudiced and, in using emotive language, appears designed to prejudice responses to the Local Plan consultation. We ask that you retract the comments publicly and engage with ourselves and other stakeholders to create a Local Plan framework which can support the delivery of genuinely sustainable development in Enfield. I look forward to hearing from you.

*Yours sincerely
Alice Roberts
Head of Campaigns CPRE London*

In summary,

The PLAN, as it stands, goes against all issued Planning Policies including the NPPF and even more so now that the NPPF has been update as of July 2021; due to this Councils will have to re-think there Local Plans.

CHGC provides access to the Countryside, Recreation & Sport for all.

CHGC is an outstanding area SINC importance recommended for further upgrade of importance

The PLAN is flawed as there are more than sufficient alternatives for further homes to be built within urban areas with existing Infrastructure including established transport links

Local and National groups have voiced their views against this PLAN

Central Government have stated they are against the use of Green Belt land for development

It is so important to remember that the Green Belt land in this area of North Enfield, of which CHGC is a major part, provides the opportunity for all members of the public to improve both their physical and mental health. It is open land with footpaths and small country roads giving space, time and solace to all for access to some of the loveliest countryside with far reaching views across to the Ridgeway with the beautiful trees and fields changing in colour and nature as each season comes and goes. Theobalds Park Road then Cattlegate Road serve the area, together with the narrow East Lodge Lane down to its junction with The Ridgeway at Botany Bay; these roads could not possibly cope with the extra traffic from a 3,000 home estate built right at the top of the Crews Hill 'ridge' at CHGC.

The land upon which CHGC stands is part of our heritage having been designed by one of the greatest ever Golf Course designers, Harry Colt. It was designed 105 years ago to blend and enhance the beautiful fields and trees across this area which once formed the Royal hunting grounds at En-felde, the clearing in the forest. We have no right to take this away. We have a responsibility to future generations to keep this land, our Countryside, for them and the climate resilience it provides.

By this PLAN, the Council just seem to be looking at the easy option, the developers' dream i.e. building in the Green Belt. This will not produce social/affordable homes, this will not reduce the traffic on our roads and this will not improve our environment. It will set about the absolute opposite, the destruction of our countryside upon which we depend as the 'lungs' of our towns and cities.

Presented by Crews Hill Golf Club (1920) Limited

Kevin Lynskey
Chairman of Management Committee

ENCS.

- Land Use Consultants (LUC) "Review of Sites of Importance in Nature" including Appendices A & C
- "Space to Build, Enfield" dated January 2019
- National Park City Foundation letter to LBE Council dated 14th July 2021