



Enfield Climate Action Forum

Tackling the climate emergency

Response to LBE consultation

Draft Enfield Local Plan 2039

Main issues and preferred approaches

June 2021

<https://new.enfield.gov.uk/services/planning/draft-new-local-plan/>

Contents

1. INTRODUCTION
2. SUMMARY
3. RESPONDING TO THE CONSULTATION
4. APPENDICES
 - MEETING THE HOUSING NEED
 - AFFORDABILITY
 - GREEN BELT
 - BROWNFIELD
 - HERITAGE
 - CLIMATE EMERGENCY
 - HEALTH, WELLBEING AND EQUALITY
 - CREWS HILL SURVEY

1. INTRODUCTION

This is a response from EnCaf 's Land Use Working Group. EnCaf, <https://www.encaf.org/>, is a local civil society forum of over 100 community organisations locally; an action group created to confront the emergency that climate change imposes on us all.

This is our formal response to Enfield's draft Local Plan 2039 under Section 18 regulations.

EnCaf's Land Use Working Group is concerned with the way in which our three most precious assets (air, water and land) are safeguarded, whilst used sustainably, for the benefit of Enfield's diverse communities and visitors.

The seven parts of the Appendix declare our priorities though not in priority order as this varies from partner to partner within our organisation.

In the summary we provide links to a more detailed response about each of our seven priorities.

2. SUMMARY

Enfield Council's draft Local Plan 2039 will shape Enfield's urban and green landscape, its economy, jobs, homes and prosperity for generations to come.

<https://new.enfield.gov.uk/services/planning/draft-new-local-plan/>

The consultation paper is 400+ pages long and accompanied by 66+ pieces of documentary evidence, difficult both to scrutinise and summarise.

The summary leaflet [here](#) makes clear that underpinning the plan is a handful of key priorities: delivering 25,000 homes "for Enfield people", a commitment to 50% genuinely affordable homes, being "deeply green" and avoiding skyscrapers in inappropriate locations. Furthermore, residents are reassured that the Local Plan will protect Enfield from "uncontrolled development" all over the Green Belt.

We cannot deny these laudable aims. However our view, informed by a detailed evaluation of the evidence provided, is that the proposed plan will not realise its goals. At the heart of the plan are too many contradictions, uncertainties and questions.

How is building on the green belt, with the inevitable increase in motorised transport, "deeply green"? **GREEN BELT** [here](#)

What is "genuinely affordable"? **AFFORDABILITY** [here](#)

How is replacing viable agricultural land at Vicarage Farm, and a prosperous gardening centre at Crews Hill, with 6000+ homes helping Enfield adapt to the challenges of climate change? **CLIMATE EMERGENCY** [here](#)

Crews Hill (3,500 homes) is currently a thriving regional hub for private and commercial gardeners providing jobs and contributing significantly to the local economy with potential to resume its traditional role as a local source of sustainable fresh food. <https://enfieldroadwatch.co.uk/>.

How can the proposals for 3000 homes on "Chase Park" (actually Vicarage Farm), ending centuries of protected access to the historic Enfield Chase and public rights of way such as Merryhills Way, preserve our heritage? **HERITAGE** [here](#)

Vicarage Farm is currently owned by Comer Brothers who have already proposed a 5,000 housing estate.

<https://enfieldsociety.org.uk/explore-vicarage-farm/>

Developers already own, or have taken options on, all of this land. How much "control" can the council exercise in assuring that the homes built can be afforded by the families of 5,000 children in temporary accommodation?

The Council states that it's "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".

<https://enfielddispatch.co.uk/environmental-charity-slams-councils-misleading-green-belt-rationale/>

Our calculations, based on the council's own data, reveal serious discrepancies between Enfield's local plan and the London Plan 2021 and underestimations of brownfield site housing numbers.

BROWNFIELD [here](#)

Our view is that there are sufficient brownfield sites which can and should be used to deliver the family housing so desperately needed and that developing these sites will help improve access to green space across the borough . **MEETING THE HOUSING NEED** [here](#)

We are convinced that building in Green Belt areas will **not** deliver **affordable** housing for Enfield's families in need. **HEALTH, WELLBEING AND EQUALITY** [here](#)

3. RESPONDING TO THE CONSULTATION

Enfield Council offers three ways of responding to the consultation:

1. Online using the bespoke consultation platform – which the council says is "the quickest and easiest way to respond" <https://letstalk.enfield.gov.uk/localplan>
2. Via email at: Localplan@enfield.gov.uk using the subject "Draft Local Plan" in the title. If you don't mind, please cc encaflanduseworkinggroup@gmail.com. Thank you.
3. Via post to: Strategic Planning & Design, Enfield Council FREEPOST NW5036 EN1 3BR

Our advice is that the easiest way to respond is by email or letter as the online survey can feel restrictive – closed yes / no answers and on occasions only 255 characters with which to respond to important areas.

4. APPENDICES

MEETING THE HOUSING NEED

The draft Local Plan is "designed to create homes for future generations⁴" but we asked ourselves to what extent the Local Plan meets the **current** housing needs, especially of the most disadvantaged families in Enfield who are without homes.

- 5,000 children in Enfield are in temporary accommodation.
- In the last three years, Enfield Council has built just 370 homes for local residents¹.

¹ Letter from Cllr Caliskan to Labour party members in Enfield

- Enfield has delivered an average 56% of the housing against the target over the last 3 years. As Enfield has failed to meet 75% of their housing targets it has been placed in the government’s category of “presumption in favour of sustainable development”²
- Temporary accommodation is unsuitable³ and costs Enfield Council millions of pounds each year.
- 4,500 residents are on the housing needs register⁴

The Borough [Profile](#) reveals

- As at October 2020, the number of empty dwellings was estimated at 3,103 (or 2.5% of dwelling stock).
- The supply of social housing in Enfield is very limited.
 - In the period April 2020 to March 2021, 458 social rented properties (a combination of Council and Housing Association homes) were let to households on the council’s housing register.
 - Of these, 392 lettings were to General Needs applicants (ie those without the need for sheltered or specially adapted homes).
 - Properties of three bedrooms (family homes) or more are in very short supply: only 79 such homes were let during this period.
 - By contrast, there are around 5,000 households on the council’s Housing Register.
 - From April 2019 to March 2020 Enfield’s Housing Options and Advice Team dealt with 2,008 applications for homelessness prevention or relief.
 - of which 1,965 households were assessed as owed a duty for assistance.
 - As at March 2020, 3,497 households were in temporary accommodation – the second highest number of all English authorities (behind Newham, with over 5,500).

By its own admission Enfield Council accepts there is an acute housing crisis⁴; these headlines reveal the reality.

Our conclusion is that the draft Local Plan does **not** meet the needs of the most disadvantaged families without homes. Neither does it recognise the needs of low income families whose housing needs are not acute but who cannot afford the housing that’s available. The local plan does not help this group at all and the plan must provide for London Living Rent homes.

Enfield Council’s Draft Local Plan proposes 25,000 new homes over 20 years to 2039 - 18,500 homes delivered in Enfield’s urban and brownfield locations and 6,500 in rural areas, including new places near Crews Hill train station. The council “commits to delivering 50% of new homes as genuinely affordable to rent or to buy – to meet Enfield’s needs”⁴.

We conclude that whilst the broad aims of the plan are laudable, they are wishful thinking because they don’t stack up against the evidence of delivery or the figures provided in the plan, and its accompanying evidence base.

Our view is that the Local Plan **does not** meet the existing need.

² <https://governance.enfield.gov.uk/mgAi.aspx?ID=50446>

³ <https://www.lgo.org.uk/information-centre/news/2020/sep/enfield-family-left-in-unsuitable-accommodation-for-three-years>

⁴ Leaflet circulated to Enfield Residents wk beg 18 August 2021

Furthermore we feel that the implication that the Local Plan will **increase the delivery of larger/family homes with gardens and of affordable housing in the Green Belt is cruelly misleading to low income families and those in temporary accommodation.**⁵

For example:

- There is no clarity about what “affordable” means.
 - If the Trent Park development on the Green Belt is indicative, affordable means shared ownership. Shared ownership requires a deposit of at least £6,000 and annual incomes of £56,000 - £90,000 + solicitors fees.
- The figure of 50% is fluid, to say the least.
 - The Whole Plan Viability Assessment says that “**up to 50%**” affordable housing could potentially be delivered on some greenfield sites, but also says that this estimate **will depend on individual site assessments** and, further, that **the assessment does not include the infrastructure costs** associated with building on Green Belt sites **and** that these costs could **impact the deliverability of housing on these sites.**
- Even if 25 000 new homes are built in the next 20 years, the total number of homes available at social, or truly affordable rent, by 2039 will not meet the needs of families now, or then.
 - Enfield’s latest Local Housing Needs Assessment (LHNA) estimates that between 1,415 and 2,797 new Social Rent homes **per year** need to be built in Enfield to make up for previous shortfalls and to respond to the increasing demand for this type of housing⁶
- So, $20 \times 1415 = 28,300$ truly affordable homes would need to be built to meet the need, exceeding the total number (25,000) planned. That is unless the council meets its targets for social rent within the 5 year period of the LHNA. Such a likelihood needs to be weighed up in the light of performance so far.
- Chapter 8 is entitled “Homes for All” but there are no policies in Enfield’s Local Plan that explicitly deal with homelessness; the homeless are barely mentioned.

AFFORDABILITY

In the words of the Leader of the Council in a leaflet to all residents distributed week beginning 17 August 2021 Enfield’s draft Local Plan 2039 “*commits to delivering 50% of new homes as genuinely affordable to rent or buy*”.

That one sentence reveals the difficulty of responding meaningfully to the intentions behind the Local Plan insofar as “affordability” is concerned.

What, exactly, does that sentence commit to?

Half the homes built might be “genuinely affordable” to rent OR they might be “genuinely affordable” to buy.

If “genuinely affordable to buy” means shared ownership, it’s not affordable. See “Shared ownership homes should not be classed as [affordable](#)”

⁵ Draft New Local Plan Consultation p190, p194 (3c) p196 (8.2.9) and delivery of family homes with gardens described as a “risk” on p12 in the public reports pack presented to council on 9 June.

⁶ 2020 Local Housing Needs Assessment <https://new.enfield.gov.uk/services/planning/enfield-strategic-housing-market-assessmentplanning.pdf> / <https://new.enfield.gov.uk/services/planning/evidence-base/>

And if “genuinely affordable” to rent does not mean at social rent, it’s not affordable either. However, such is the complexity of housing policy that it is possible to have affordable intermediate rents (London Living Rent) so, at the very least, far more clarity is needed in public documentation.

Or will half the homes built be a combination of the two, leaving the developers to choose the housing mix on the basis of what they consider viable⁷ i.e. profitable: *“When determining the amount of affordable housing acceptable on the site, regard will be given to the economics and financial viability of the development including any particular costs associated with it”*.

And what is “genuinely affordable” ?

And, in any case, the remaining 50% will be at market rents or market purchase, neither of which is affordable when the average home in Enfield costs 14 times the median household income⁴.

Homes in the Green Belt fetch far, far more than this and are out of most people’s reach. We are left reflecting on what *“50% affordable housing in all areas of the Green Belt, including the proposed rural place making areas at Crews Hill and Chase Park”* means in reality.

The 8.2 Strategic Policy SP H2: Affordable housing p 194 is non-committal:

- “The Council will **seek to maximise** the delivery of affordable housing in the Borough **and aim to secure** 50% of all new homes across the plan period as **genuinely affordable.**”
- Proposals that involve the loss or demolition of existing affordable housing floorspace (including estate regeneration schemes) **will be expected to deliver at least** an equivalent amount of affordable housing floor space and, **where possible**, achieve an uplift in provision.
- Estate regeneration schemes **will be expected** to reflect the existing mix of affordable and family housing.

8.4 Policy DM H4 proposes that “small sites and small housing development **seek to achieve** the London Plan target of 353 new homes per year on sites of less than 0.25 hectares”, a not insignificant number. And yet there are no specific targets for affordability in developments of 10+ homes and should be

The commitments to affordability are vague.

Below we examine precedent and conclude that the commitments to affordability are not borne out in practice either.

- The number of affordable Social Rent homes built in Enfield has been lower than the number lost (e.g. demolished).⁸
- The building of Social Rent homes in Enfield has not kept up with demand and Enfield is now approximately 1,600 homes short of its 2011-2020 housing target for Social Rent homes⁹.
- And yet the delivery of Social Rent housing in Enfield has declined recently. As this chart shows, since 2018 more Social Rent housing was demolished/lost in Enfield than built¹⁰.

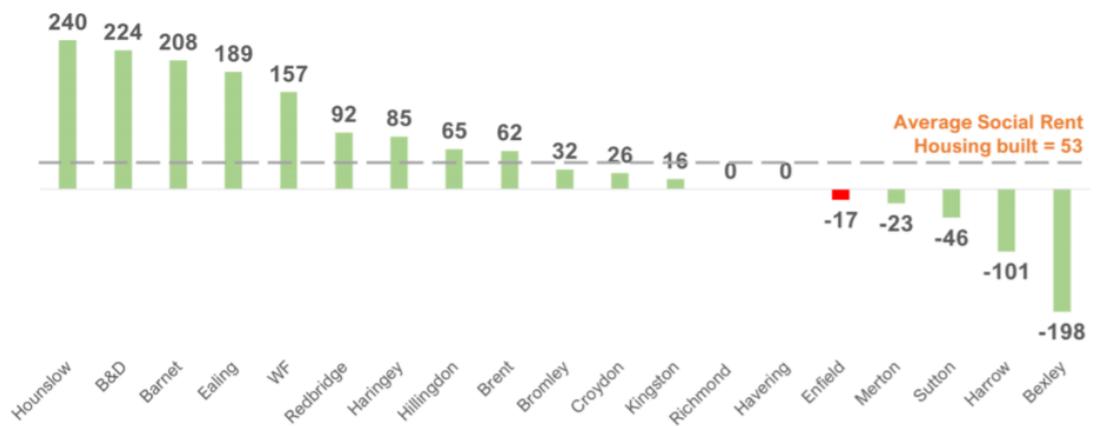
⁷ P197 Local Plan 2039 consultation document

⁸ Sources: MHCLG Housing Delivery Test 2020, GLA Planning London Datahub

⁹ Shortfall is the difference between the GLA reported figures for Social Rent Housing and the targets for Social Rent housebuilding set by Enfield in its Core Strategy 2010-2025.

¹⁰ Evidence of need can be seen on 2015 SHMA and 2020 Local Housing Needs Assessment
<https://new.enfield.gov.uk/services/planning/enfield-strategic-housing-market-assessmentplanning.pdf/>
<https://new.enfield.gov.uk/services/planning/evidence-base/>

Social Rent Housing Built in 2018-2021



Source: <https://data.london.gov.uk/dataset/planning-london-datahub>

- See “Less than Zero” - The Decline of [Social Rent Housing](#) in Enfield
- Over the last 10 years 1740 additional units came from minor developments, 36% of all additional units in Enfield, a significant element of housing delivery in Enfield, but not necessarily affordable as there is no requirement for them to be so.

GREEN BELT

The relevant references here are PL9 (Crews Hill), PL10 (Chase Park aka Vicarage Farm) and PL8 (Rural Enfield).

PL9 and PL10 propose unprecedented and radical changes to the Green Belt in Enfield, with plans to create two massive housing developments of between 6,000 and 8,000 dwellings, depending on the figures provided by the council or the developers (Comer Brothers).

The proposals are underpinned by Enfield’s 2021 Green Belt and Metropolitan Open Land Study (2021 GB/MOL) by LUC consultants which seeks to justify de-designation of substantial areas of the Green Belt in Enfield, following a Green Belt Boundary Review in 2013 which makes no such recommendation.

In this study the authors indicate that their judgements “*inform only part of a necessary ‘exceptional circumstances’ case for making alterations to Green Belt and / or MOL boundaries*”. The analysis consists of assessing the “*greatest contribution to the greatest number of Green Belt purposes*” set out in the National Planning Policy Framework (NPPF) though acknowledging that “*Green Belt land only needs to contribute to one of the Green Belt purposes to be of value in Green Belt terms*”.

Thus the case for “exceptional circumstances” is not fully made in this lengthy and comprehensive judgment. Since the rationale for de-designation is not made explicitly anywhere else, the policy contradictions, uncertainties and unanswered questions in the proposed Local Plan are sufficient to undermine any justification for de-designation.

“Chase Park” is Vicarage Farm, a large area of open countryside, traversed by Merryhills Way, designated a public right of way by Enfield Council in 2011 and which, under the proposals, would be surrounded on both sides by housing. The Enfield Society illustrates this [here](#). There can be no justification for this under the NPPF, and no exceptional circumstance. Indeed the proposal is explicitly undermined by these policies in the Local Plan consultation document. Further, the health

imperative identified in policies Sc1 and Sc2 strongly argue in favour of walking in green spaces for health and wellbeing.

In fact there is already a deficit of green space in the wards adjacent to Chase Park i.e. Town and Highlands wards. A green space deficit is anything under 2.15ha open land per 1,000 residents – the current ratio in Town is 0.33 and in Highlands 0.90 (see Blue and Green Strategy Audit), as such residents rely on this area for open space, relaxation, green prescribing etc.

The council asserts that the acute housing problems of the borough can only be solved by building on the Green Belt. We refute this (see above).

Strategic Policy SP BG2: Protecting nature conservation sites
Strategic Policy SP BG3: Biodiversity net gain, rewilding and offsetting
Strategic Policy SP BG4: Green Belt and Metropolitan Open Land
Strategic Policy SP BG5: Green Belt and edges of the countryside/urban areas
Policy DM BG6: Protecting open space

Amongst the “lowest contributing Green Belt within the borough” according to the 2021 GB/MOL study, is the “inappropriate

developments associated with the commercial and industrial estates adjacent to the insert urban area of Crews Hill”.

Notwithstanding the well documented failure of enforcement by the local authority in this area, the proposed local plan fails to recognise the contribution of Crews Hill to the local economy, leisure and tourism, health and wellbeing and the climate emergency in relevant local plan policies. An historic

9. Economy

Strategic Policy SP E1: Employment and growth
Strategic Policy SP E1: Employment and growth – options
Strategic Policy SP E2: Promoting jobs and inclusive business growth
Strategic Policy SP E3: Employment locations and managing change
Strategic Policy SP E4: Supporting offices
Strategic Policy SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites
Policy DM E6: Redevelopment of non-designated sites
Policy DM E7: Providing for workspaces
Policy DM E8: Local jobs, skills and local procurement

centre for market gardening, providing food for Londoners post war, the potential for Crews Hill to be a hub for a sustainable local food supply, “green” jobs (with links to local Capel Manor College for training and apprenticeships)

and tourism is immeasurable.

And yet not even the most superficial cost benefit or SWOT analysis has been performed on the potential for this area, as part of SIL for instance to alleviate the pressures on SIL elsewhere with the potential to release land for homes in the heart of communities, not distant from public transport, community amenity and social networks.

The topic papers on PL9 Crews Hill and PL10 Chase Park (Vicarage Farm) provide assessments of PTAL and estimates of travelling time to transport hubs that are wholly unrealistic in terms of a demographic (65+) that is growing faster than any other, the fact that 25% of the working-age population have a disability and the families with young children for whom the housing estates are allegedly being built. PL9 Crews Hill and PL10 Chase Park (Vicarage Farm) will increase domestic car ownership and journeys as the homes will be too distant from railway stations which is neither promoting sustainable transport nor active transport. Quite the contrary. And will, further, make the homes inaccessible in terms of transport as well as price for those families which desperately need them.

The claims of these papers are also undermined by the findings of transport assessments in the evidence base

Policy BG9 refers to “Allotments and Community Food Production” but restricts itself to “roof gardens, allotments and community orchards”. Enfield is described in this policy as “a leading centre in the development of sustainable food production and horticulture” something of an exaggeration which could become true but only if the ill-conceived policy (PL9) is abandoned and PL8 (Rural Enfield) is re-conceived.

A policy on Rural Enfield is welcome. This is the wrong one and wholly ill conceived.

Crews Hill is a vibrant local and regional hub for horticulture, equestrianism and, in recent years, retail. Whilst other town centres in Enfield are receiving attention because they are declining (TC1 and TC2), Crews Hill is flourishing with visitors from many miles away as evidenced by Enfield Roadwatch's [survey](#)

CL2 Leisure and Tourism recognises the importance of visitors to the rural economy but fails to recognise Crews Hill, or indeed Enfield's agricultural heritage as contributory. Indeed, RE4 (Farm diversification and rural employment) indicates a policy direction **away** from agriculture which is, in the light of potential food insecurity due to climate emergency, retrograde.

DMCL2 explains that the Council *"considers that the leisure and visitor experience in the borough has the potential to contribute significantly to Enfield's economic growth. It can contribute to enhancing quality of life through delivering experiences for visitors and a greater variety of jobs and training opportunities. Importantly, it can help support regeneration, and diversify and develop the rural economy"*.

The Integrated Impact Assessment (IAA) Chapter 12 identifies as an issue "the need to protect valued landscapes, including designed landscapes and extensive semirural landscape character areas in the north of the borough, and avoid loss of Green Belt that contributes to the established Green Belt purposes"

PL9 and PL10 are totally antithetical to this ambition.

BROWNFIELD

Our calculations, based on the council's own data, reveal serious discrepancies between Enfield's draft Local Plan and the London Plan and underestimations of brownfield site housing numbers.

Our view is that there are sufficient brownfield sites which can and should be used to deliver the family housing so desperately needed. **MEETING THE HOUSING NEED** [here](#)

Just four examples suffice to illustrate this.

1. SA2 Palace Gardens: Between 600 and 1,200 homes will be built in Enfield Town at Palace Gardens / Palace Exchange, yet only 350 are included in the Draft Local Plan
2. PL5 Meridian Water: 5000 in the Draft Local Plan, elsewhere 10 000
3. SA49 Brimsdown, Land to the south of Millmarsh Lane, Brimsdown Industrial Estate: 0 in Local Plan, but *Areli Developments "is providing strategic planning and development advice toward the creation of a whole new town for London on 65 acres of riverside land" for 7500 homes in Brimsdown London.* [Brimmsdown](#)
4. SA15 Joyce Avenue & Snells Park Estate N18 2SY 1217 homes in Local Plan. The homes are already in the pipeline but designated in a 10 year window. The [Council Minutes](#) acknowledge that the scheme would be expensive but it would create **over 2000 new affordable homes.**

More detailed data can be found [here](#) under these headings

1. [Homes built on small sites: Serious discrepancies between the London Plan and Enfield Council's draft Local Plan](#)

2. [Enfield Council's draft Local Plan undercounts the number of homes that could be built on brownfield sites](#)
3. [Homes built in Green Belt areas: Building in Green Belt areas will not deliver the affordable housing Enfield Council claims](#)
4. Homes for families: Brownfield sites can and should be used to deliver more family housing (awaiting publication)

These papers explain why 25,000 homes can be built on areas outside the Green Belt, and the benefits of taking this approach.

HERITAGE

Enfield Town is an ancient market town. Its market was established by Royal Charter from King Edward 1st in 1303.

The many historic buildings built in the 7 centuries since make Enfield Town a rich conservation area.

Enfield Chase was a royal hunting ground established by the Plantagenet kings in the middle ages. Critically, it was closely connected with Enfield Old Park, which is even older and appears in the Domesday book. Deer were raised in the Old Park and released into the Chase for hunting. Currently 1,500 hectares of undeveloped former Chase land, currently designated Green Belt, lies east of the Hertford Loop railway line.

This land is designated as an Area of Special Character and also as Enfield Chase and Camlet Moat Archaeological Priority Area.

Dr John Langton, Emeritus Professor St John's College, Oxford writes [that](#) "*Enfield is the only surviving example of a chase, within which rights to game and over vegetation varied slightly from those in forests. Thus, Enfield possesses an extremely rare and very valuable landscape asset*".

A failure of due diligence in determining the scope of Chase Restoration [Project](#) has already destroyed an important historic, education and cultural link between Rectory Farm, a publically accessible commercial wheat farm adjacent to the London Loop, and [Wrights](#) Flour Mill in Ponders End. There has been a mill at Ponders End for 900 years and the present mill, owned by members of the Wright family since 1867, is Enfield's oldest working industrial building.

Rectory Farm is now grassland awaiting tree planting; the immediacy of local food production, and views of rolling wheatfields enjoyed by thousands of visitors, especially during lockdown, ruined.

At best these policies put Enfield's ancient heritage at risk:

- CL9 Crews Hill
- CL10 Chase Park
- PL1 Enfield Town

The [Integrated Impact Assessment](#) (IAA) scoping report proposes a heritage related objective to:

- Sustain and enhance the significance of heritage assets, support the integrity, special interest, character, appearance and historic setting of historic settlements and heritage assets, both designated and non-designated;
- facilitate enhancements to the fabric and setting of the historic environment;
- support access to, interpretation and understanding of the historic environment (including through investigations and studies which better reveal the significance of archaeological assets).

CL9 Crews Hill, CL10 Chase Park and PL1 Enfield Town do not do this.

CLIMATE EMERGENCY

EnCaf is dedicated to “tackling the climate emergency”. Reassuringly, the Local Plan has a section dedicated to this purpose, SE1: Responding to the climate emergency, with a raft of wholly appropriate ancillary policies, thus:

4. **Sustainable Enfield**
 - Strategic Policy SP SE1: Responding to the climate emergency
 - Policy DM SE2: Sustainable design and construction
 - Policy DM SE3: Whole-life carbon and circular economy
 - Policy DM SE4: Reducing energy demand
 - Policy DM SE5: Greenhouse gas emissions and low carbon energy supply
 - Policy DM SE6: Renewable energy development
 - Policy DM SE7: Climate change adaptation and managing heat risk
 - Policy DM SE8: Managing flood risk
 - Policy DM SE9: Protection and improvement of watercourses
 - Policy DM SE10: Sustainable drainage systems

And

13. **Movement and connectivity**
 - Strategic Policy SP T1: Promoting sustainable transport
 - Policy DM T2: Making active travel the natural choice

There are some good policies here, for example:

- The ban on new gas connections
- The endorsement of the circular economy approach to building design and construction
- Prioritising reuse and retrofit of existing buildings
- Monitoring energy use for five years
- The endorsement of passivhaus.

All this is good – though the timescale is often far too long. As an example – but a critical one – we see no reason why the passivhaus standard should not apply from 2023.

But are they policies that the council means to follow? That seems doubtful:

- Policy SE3 says the priority is to “*reuse and retrofit existing buildings wherever possible before considering the design of new buildings*”. But there’s little about planning for reuse. Instead we have plans to build 6,000 houses on the Green Belt and tower blocks in Enfield Town!
- Policy T2 is to *Make active travel the natural choice* yet we see almost no proposals for new active travel infrastructure or services. For instance, there’s only one proposal (on page 45) for a new cycle lane. Quieter neighbourhoods are also mentioned once, but as part of the (many) conditions to be met by developers. No suggestion that the council has an overall plan or will take any initiative.
- Policy SE7 says that “Developments will be required to minimise overheating ... and optimise the layout ... and design of buildings ... to minimise any adverse impacts on internal and external temperature”. Tower blocks of the sort approved or planned for Enfield cannot satisfy this policy. Air conditioning will be required and this, like lifts, increases the energy requirements. This is not a route to sustainability.

And some are not good at all. Thus Policy SE5: “Temporary fossil-fuel primary heat sources must only be installed for a maximum of five years prior to connection to an approved low carbon heat source”. The problem here is that temporary exceptions tend to become permanent. Consider the gas-fired plant (up to 60MW gas boilers and up to 1,800kWe gas-fired combined heat and power plant) that will provide Energetik with heat until the new incinerator comes on line and as a standby

for when it's out of action that was given [planning permission](#) in July 2020. Will that really be turned off once the incinerator is working?

And then there's the question of what isn't there. For instance:

1. Most of the buildings that will be in use by 2050 – the government's zero carbon target date – are both already in use and horribly inadequate. Yet there's no mention of the huge retrofit programme that is urgently needed and thus no dates nor energy-efficiency targets.
2. Electric vehicle charging points are mentioned twice, and the commitment is heartening. But specific targets and a plan are necessary for the proposals to have credibility. Neither is present.
3. No plans for the Council to improve travel infrastructure or services.

The policies are admirably ambitious, but owe more to the easy rhetoric of word processing than to emergencies averted. With the inspiring exception of SE10 Sustainable Drainage Systems, SE8 and SE9, the reality, as evidenced by other policies in the Local Plan and the [response to the declaration of climate emergency](#) in 2019, is different.

The Local Plan does indeed "play an important role in helping the Borough respond to the climate emergency" and it's encouraging to read in SE3 the priority to "*reuse and retrofit existing buildings wherever possible before considering the design of new buildings*".

How does this admirable intention stack up against, for instance, PL9 Crews Hill and PL10 Chase Park and 6500+ homes in a brand new development on the Green Belt with no proposals for a supporting public transport infrastructure ?

And what of the implication of "new built form" in Enfield Town PL1 which, on the basis of the initial proposals, will require demolition of existing buildings to make way for tower blocks?

We feel there should be much more emphasis on [expanding and upgrading existing buildings](#)

And the further implication of the replacement, with a much larger construction, of the [waste incinerator](#) in Upper Edmonton, of which there is no mention in PL4 Angel Edmonton?

This incinerator is the very opposite of renewable energy (SE6) and the antithesis of a circular economy SE3 because of the embodied carbon associated with demolition and reconstruction. As stated in SE3 "*up to a fifth of carbon emissions associated with UK building stock comes from embodied emissions associated with new builds*".

And then there are the carbon dioxide emissions which are not listed by London Energy as [emissions](#), though carbon dioxide emitted broadly matches that of oil, gas and coal fired power stations. The policy to replace the incinerator blatantly ignores SE5 Greenhouse Gas emissions and low carbon energy supplies which says "*Any new energy networks should prioritise non-combustible, non-fossil fuel energy as the primary heat source. Temporary fossil-fuel primary heat sources must only be installed for a maximum of five years prior to connection to an approved low carbon heat source and interim emissions should be reflected in energy statements and subsequent calculations and offset payments*".

The Local Plan, by virtue of 68 mentions and policy DE6 Tall Buildings, commits to "tall buildings". Nowhere in the local plan is there an analysis of tall building design for adaptation to climate emergency, or reflections on concerns such as:

- lifts use electricity
- how shade is provided in tower blocks

- how 100 degree heat is mitigated in tower blocks
- air conditioning: which consumes electricity, emits heat and employs [refrigerants](#) that are greenhouse gases (GHG) more potent than carbon dioxide.

The highest building in Enfield, approved by the planning committee in September 2020, will be 29 storeys high, almost three times any existing buildings. The Local Plan envisages these heights:

Height (storeys)	Height (metres)	“appropriate locations”
26	78	Meridian Water
23	69	Edmonton Green
17	51	Enfield Town Station
16	48	Southbury Station, Silver Street, Brimsdown
15	45	Cockfosters station
13	39	Palace Gardens, Enfield, Southgate Circus
13	39	Enfield Civic Centre
11	33	Enfield Chase station, Palmers Green, Oakwood station
9	27	Arnos Grove

Electric vehicle charging points are mentioned twice, and the commitment is heartening, though specific targets are necessary for the proposals to have credibility. Numbers and energy-efficiency targets for a big retrofit programme are equally essential. Commitments even to setting more tangible, quantitative proposals would be more convincing.

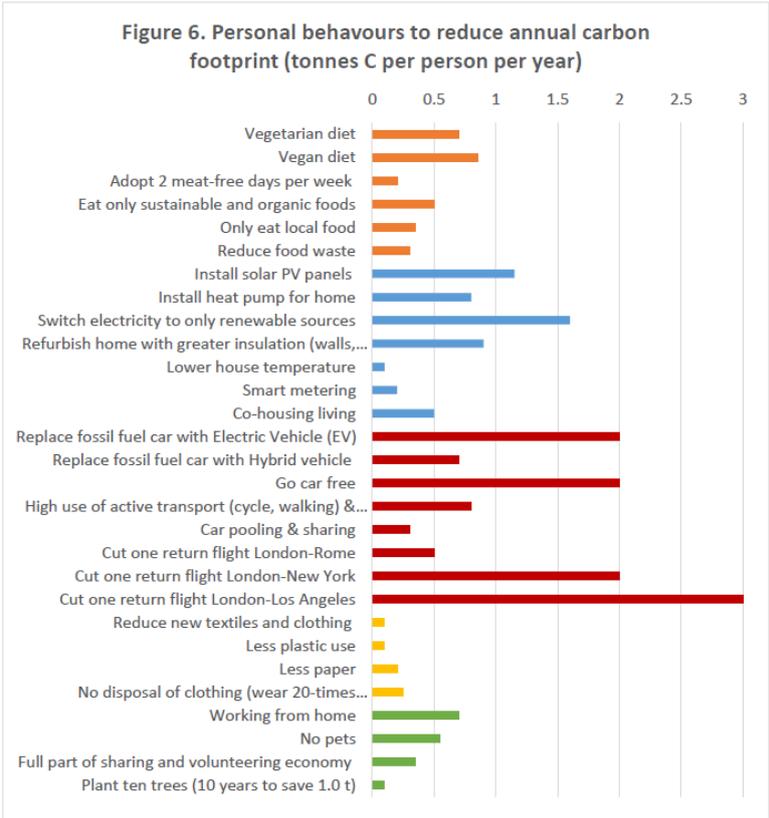
And for residents keen to pursue their own electric vehicles, the lack of information about providing EV charging to existing properties with one street parking is discouraging.

In Enfield’s Climate Emergency Action Plan the council makes a commitment to **“Influence residents to adopt zero carbon lifestyles and take low carbon decisions.”** Alongside the recognition of the important part that the Local Plan plays in helping the Borough respond to the climate emergency, it’s disappointing to read how limited the Council’s ambition to influence residents is.

Prof Jules Pretty¹¹ recently published a paper called [“The Good Life and Low Carbon Living”](#) which included this guide to personal behaviours to reduce annual carbon footprint, under the headings food, home, mobility, stuff, leisure (colour coded in the chart below). It’s a useful guide to what will make a difference and should inform policy priorities.

The advice is this: don’t try to do too much at once. Pick one choice, and implement; and then pick another. Enfield could do worse than follow the campaign of the Norfolk Association of Local Authorities, who urge *“cut a tonne in ’21.”* And provide the infrastructure to do it.

¹¹ Professor of Environment and Society, University of Essex, February 2021



We need more confidence in the commitment to the principled policies on sustainability contained in the Local Plan.

HEALTH, WELLBEING AND EQUALITY

The relevant policy proposals are

5. **Addressing equality and improving health and wellbeing**
Strategic Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities
Strategic Policy SP SC2: Protecting and enhancing social and community infrastructure

Enfield's Borough Profile (p4 and p27) reveals the challenges to health facing Enfield in more depth than 2.1.8 in the Spatial Portrait (Chap 2).

Healthy streets and encouragement of active travel are important policy platforms but without robust policies to discourage motorised transport in the most polluted areas, encourage car sharing and hiring (Zipcar for instance) and improve public transport infrastructure, the proposals remain unconvincing. The council does not do enough to engage communities or use its influence; the introduction of Low Traffic Neighbourhoods being a good example of a wholly supportable policy which has proven highly controversial and divisive because of the means by which it was implemented.

Further, the health economy in Enfield is very fragile indeed. Provision of and access to primary health are both severely constrained; not the fault of GPs and primary healthcare providers, or Enfield Council, but of a decade of underinvestment and reliance on overseas trained professionals.

Our question is, does this Local Plan add to or diminish these pressures?

In respect of air quality, provision of green space and policies to address the fastest growing demographic i.e. Over 65s (likely to be most impacted by both air pollution and heat), Enfield's Local Plan will only add to the pressure on primary health.

The [Air Quality Appraisal](#) draws important conclusions. It says "Monitoring undertaken by the Council suggests that pollutant concentrations within the borough should now meet the objectives in most locations, **although the monitoring coverage is limited.**

It most definitely is, and EnCaf's Air Pollution Working Group has begun a project with [Global Action Plan](#) to deploy diffusion tubes to monitor pollution in pollution intensive areas such as the A406 (North Circular) and Bullsmoor Lane because of their concerns regarding air pollution in some areas.

The Air Quality Appraisal goes on "Modelling undertaken by the Greater London Authority for 2016 right across London highlights likely pollution hotspots within the borough. Particularly notable are areas alongside the M25, the A406 North Circular, the A10 Great Cambridge Road and the A1055 Bullsmoor Lane. These hotspots have been identified by the Greater London Authority as Air Quality Focus Areas".

The A406 North Circular is the site of the proposed enlarged waste incinerator in Upper Edmonton. Increasingly questions are being asked about microparticle emissions and their [impact on health](#) including guidance from DEFRA to [Directors of Public Health](#) which states "There is no safe level for particulate matter (PM10, PM2.5), while NO2 is associated with adverse health effects at concentrations at and below the legal limits". The Local Plan fails to mention this, or the increased vehicular movements associated with the intention to import waste from beyond the boundaries of the North London Waste Authority.

The conclusion of the Air Quality Appraisal is also concern:

It was found that an estimated 14,806 residential units across 18 site allocations would potentially be exposed to relatively poor air quality; about 60% of proposed units. 38 sites near Air Quality Focus Areas are, potentially, at risk of a “significant negative effect” from air quality. It goes on, “Site allocations with potentially poor air quality would require measures to protect new residential population from poor air quality.”

It isn't clear what these measures might be but we would expect, under the circumstances, the Local Plan to at least address the potential impact of the proposed incinerator on health. It doesn't.

Heatwaves, or heat and hot weather that can last for several days, can have a significant impact on society, including a rise in heat-related deaths. [“Heatwaves are among the most dangerous of natural hazards.”](#)

The lack of woodland and appropriate green space for shade in the East of the borough is a major health concern given the changes in climate and the mid-summer temperatures that we're already experiencing. The urban heat island (UHI) effect is considerable in those areas and areas of green space and woodland of sufficient size are known to alleviate the issue and lower temperatures.

The [Integrated Impact Assessment](#) Appendix A 4.26 explains the UHI and illustrates how Enfield is affected by summer heating in comparison to the rest of London. It concludes that the east of the borough is more adversely affected by heat and, that since poorer Londoners will be more adversely affected by UHI, and that heat is more of an issue in the east of the borough, LBE will “need to carefully consider the spatial distribution of development, it's impacts on heat and the social and economic east/west divide in the borough” .

It's well established that UHI is exacerbated by dark surfaces and that increasing the proportion of white surfaces (eg on roofs) can alleviate the heating effect. The draft Local Plan does not address these sorts of solutions that are being adopted elsewhere, for instance regarding the impact of tarmac in large quantities or the increase in the UHI arising from two massive housing developments in Chase Park PL9 and Crews Hill PL10. These areas currently have relatively low land surface temperatures and should remain that way.

Reporting that the Met Office is predicting hotter and drier summers with London being located in the driest region of the UK, the IAA considers that drought is as significant a concern as flooding. Whilst the policy response to flooding in the draft Local Plan is admirable, drought isn't mentioned at all.

The environmental impacts of drought may include low flows in rivers and impacts on wetlands. This can also cause a reduction in water quality and damage to aquatic ecosystems. Further with a rising population the water resource gap could be over 100m litres per day by 2040.

The IAA objective in respect of climate change is

- to ensure resilience to climate change particularly mindful of the likelihood of climate change leading to **problematic high temperatures**, worsened flood risk and **increased risk of drought**.

The draft Local Plan does not do this.

The [unpublished report into Meridian Water Environment Strategy](#) by the majority of Enfield's Environment Overview and Scrutiny Panel raised “serious questions” about the environmental impact of the proposed Meridian Water development.

Reports from Better Homes for Enfield reveal, on the basis of data provided by Enfield, that [“Meridian Water will deliver a lower proportion of open green space than Hong Kong”](#) and in [“Meridian Water – Greenspace, Health, and Inequality”](#) that the redevelopment will have a detrimental impact on the existing local community’s [greenspace provision](#).

The Local Plan could address this by planning for green space and woodlands where they are most needed to address health and social inequalities ~ in the east of the borough in the form of “tiny forests” e.g. in existing parks and playing fields (e.g. Durrants, Jubilee, Albany, Bullsmoor Lane, Bellmore playing fields, school playing fields, in the two new small parks (Edmonton Marshes and Brooks) or as a continuous swathe across Lee Valley to Epping Forest. CPRE proposes Banbury Reservoir Park as one of [Ten New Major Parks for Enfield](#), adjacent to Meridian Water.

Over 65s are the fastest growing demographic in Enfield, which already has a disproportionate number of care and nursing homes relative to the size of the population. Primary Care funding for Enfield, based on a demographic profile decades out of date, is insufficient to this need.

[The Integrated Impact Assessment](#) (LUC consultants) Appendix scopes the challenges and notes that “there are significant pressures on health infrastructure” namely:

- Too few GP practices on estates;
 - An ageing GP service with inadequate facilities, 50% of practices are in old residential properties;
 - There is a struggle to match adult social care availability with hospital out patients, resulting in delayed discharge;
 - Uneven distribution of private and public care homes between the west and the east of the borough respectively;
- and
- Cross boundary movement of patients is putting increased pressure on facilities, in particular Chase Farm Hospital

The intention of the Council to support the provision of appropriate housing to meet the specialist and supported needs of vulnerable people in Enfield, including specialist housing for elderly people is welcome (H5 Supported and Specialist Housing).

H5 further states that by 2039:

- there will be an increasing need for specialist housing for older, disabled or vulnerable people in Enfield;
- the number of older person households aged 75 and over, who are most likely to move into specialist older persons housing, will increase by 56 per cent over the plan period;
- the overall need for residential care (C2 use class) between 2020 and 2036 is projected to increase by 755 units and specialist older person by 1,242 units.

(Though the London Plan sets an annual benchmark of 195 specialist older persons housing, but this is up to 2029).

Additional care homes (~ 300 beds) are already in the planning pipeline and more are envisaged in the Local Plan:

- PL10 Chase Park SA29 Arnold House (60+ homes)
- SA41 Albany Leisure Centre (30+ homes)
- Chase Park Topic Paper HIC6 and HIC 10 are promoted as sites for extra care or older age housing.

It is hard to see how the crumbling primary health infrastructure will be able to cope with the demands of poor air quality, excessive heat and an ageing population; but health, wellbeing and equality in Enfield will undoubtedly suffer.

CREWS HILL SURVEY

Signatories to a letter about the Local Plan collected over 2 day period at Crews Hill, outside Thompsons of Crews Hill. The survey shows the number of visitors to Crews Hill from outside Enfield and that residents from all parts of Enfield visit Crews Hill.

Summary

TALLY FOR FIRST DAY		TALLY FOR SECOND DAY	
Enfield postcodes	39	Enfield postcodes	78
EN non-Enfield	31	EN non-Enfield	40
IG	2	IG	4
Misc	2	Misc	7
HA	6	HA	4
NW	5	NW	3
RM	3	RM	2
WD	3	WD	6
LU	2	LU	0
AL	5	AL	10
HP	3	HP	0
E	9	E	9
N non-Enfield	18	N non-Enfield	22
SG	5	SG	7
CM	9	CM	6
CO	0	CO	2
TOTAL	142	TOTAL	200 [weekend total 342]

CREWS HILL - 28-29/8/21	
EN postcodes outside Enfield	
EN5 4PP	X
EN5 4PP	X
EN4 8QZ	x
EN6 4EJ	It would be a shame for gardening centres to disappear for greedy developers
EN6 4JR	I've been coming to Crews Hill for 50 years for the plants and lovely nurseries to have coffee, etc. with my husband at weekends. [Cuffley]
EN9 3AU	Been coming here for years and love the garden centres [Waltham Abbey]
EN4 8PA	New to the area – however shops made a huge impact on my garden, etc. Would love to continue to shop in this area.
EN4 8PA	Need to keep places like this in business!
EN8 0AS	X [Cheshunt]
EN10 6PE	X [Broxbourne]
EN9 3DE	X [Waltham Abbey]
EN10 6HH	X [Broxbourne]
EN10 6EA	X [Broxbourne]
EN10 6LF	X [Broxbourne]
EN7 5SL	X [Goffs Oak]
EN10 6FX	Best place for garden centres and pet stores locally and flowers [Broxbourne]
EN10 6FX	X [Broxbourne]
EN11 9FS	I visit Crews Hill regularly and would not want to lose this important area for shopping [Hoddesdon]
EN11 9FS	I visit Crews Hill regularly, and would not like to see businesses have to shut and people lose this lovely space. [Hoddesdon]
EN7	Great to shop. Good cafes. Great for the kids. [Cheshunt]
EN7 5JJ	Great place to visit. Come weekly. [Goffs Oak]
EN7 6NZ	x
EN8 9QY	X [Cheshunt]
EN8 9QY	X [Cheshunt]
EN6 2JH	We use Crews Hill businesses all the time. We would hate to lose all the lovely shops. [Potters Bar]

EN6 2JH	x
EN4 9AJ	I love coming to Crews Hill. I have been coming since I was little.
EN11 6AR	I work in the garden centre in Crews Hill [Cheshunt]
EN8 8BS	x
EN5 2BL	x
EN5	X [Potters Bar]
EN5	X [Potters Bar]
EN5	X [Potters Bar]
EN9 1LN	X
EN7 6JP	X
Hemel Hempstead	X
EN11 8PY	X [Hoddesdon]
EN8 0LN	X
EN7 6WA	X [Cheshunt]
EN9 1LN	X
Elstree	Been coming here for years from Elstree – unique area!
EN9 3EW	X
EN8 7QT	x
EN8 0DE	X
EN6 2DH	Keep the Green Belt – once gone it will be lost forever!
EN6 2DH	x
EN6 5DE	X
EN6 5EG	It's a lovely area and such a nice and welcoming place and so many shops and places
EN7 5QD	Independent shops are great and one of a kind area around here
EN8 9JX	X
EN9 3BW	X
EN6 6JL	X
EN6 6JL	X
EN10 6JL	X
EN8 0UN	X
EN8 0UN	X
EN6 4NP	Only garden centre in area
EN8 9HS	Only garden centre in area
EN10 6LF	Love coming garden centre and lunch
EN8 9QG	Been visiting for many years!
EN6 hHX	X
EN5 5QX	X
EN9	X
EN6 5HW	X
EN4 8HY	X
EN5 5DA	X
EN6 4DL	X
Cuffley	Only place I came out to during lockdown
EN10 6PG	Been coming here for over 50 years. Disgraceful to think it will be taken away
EN4 0QS	X
EN6 1NN	The area forms a vital part of the local economy
[71]	
ENFIELD postcodes	
N9 9PY	These garden centres are used by people from all over London and Herfordshire
N9 9PY	Garden centres are very useful
EN2 6NF	Great to bring grandson to and get all our garden supplies
EN2 8DP	I like the plants [9 years old]
EN2 8DP	I like plants
EN2 8DP	I am 17 years old and I love the plants
N14 4EY	We have been coming here forever and cannot imagine Enfield without it. People come from everywhere to visit.
EN2 8DP	This is the place where we have been coming as a family to get the things we need for our garden.
EN1 4AA	x
EN1 4AA	x
EN1 3UQ	x
N14 6QW	x
N21 3AJ	x
EN3 5HR	x
EN3 6SN	x

EN1 3SE	x
EN1 3NB	Only garden centre – fantastic shops
EN1 4PS	Garden centres and open spaces.
EN1 4PS	Only garden centres for miles – lots of surrounding green space – once it's gone for development it won't be available to rewild.
N13 5AR	Nice area surrounded by land and spaces. Excellent oasis to visit with family. No developments thank you.
EN1 3TZ	Crews Hill is a great place for all our garden needs.
EN1 3QY	x
EN3 4AZ	x
EN3 4AZ	x
N14 6QS	A wonderful place for all our needs
N21 2AP	We would be lost without it.
EN1 4QZ	x
EN2 0LR	x
EN2 8LB	x
EN3 6BN	x
EN3 6BN	x
EN3 6BN	x
EN2 0LS	x
EN2 0LS	x
EN2 9BL	x
EN2 0HH	x
EN2 8ED	Please save the green belt. It is vital for peoples well being, and JOBS
EN2 8ED	x
N14 7HD	x
EN1 3DS	x
N13 5NR	x
N13 5NR	x
N9 7PU	x
EN2	x
EN1	x
N9 9TP	x
EN2 9JE	The whole development plan is contrary to [1] the Mayor or London's directive and [2] your own plan to keep the Green Belt and to make it more accessible to all. By removing it and developing on it you make it accessible to no one!!
EN2 0JY	The green belt plans disgust me. We live in this area as its so green. SHAME ON YOU!!!
EN2 9UE	X
EN2 0DX	X
EN2	X
N13 5QQ	X
N13 5AJ	X
N13 5AJ	X
N18 2NB	X
N13 5AJ	X
EN2	X
EN3 7LE	X
EN3 7LD	X
EN2 7PA	Greenbelt is for the residents of Enfield and beyond to enjoy. Save it.
EN2 7HD	KEEP ENFIELD GREEN. THE GREEN SPACES HAVE BEEN ESSENTIAL FOR MY MENTAL HEALTH DURING LOCKDOWN.
EN2 7HD	X
EN2 9BZ	X
EN2 9BZ	X
N21 2SE	X
N9 0NB	X
EN2 0ED	I am against the redevelopment of Crews Hill and losing the garden centres and other businesses.
EN2 0LS	X
EN2 0BJ	X
EN2	x
EN2 0LJ	X
EN2 0BJ	X
EN2 0LS	X

EN2 0LS	X
EN2 0LS	X
EN2 8EQ	X
N21 3ES	It's appalling that Enfield Council is planning to build on green belt land when there is enough brownfield land available. <u>USE IT</u>
EN2 7NF	x
EN1 2AL	Leave us along
EN2 0TU	X
EN3 5LA	X
N21 1NX	It's the only garden centre I use
EN1 4TN	It's the only local place for plants, etc. [good variety]
EN2 9BX	X
EN2 9BX	X
EN2 0UG	X
EN2 9JQ	X
EN3 6GP	X
EN2 9JQ	X
EN3 5QL	X
EN2 0NS	X
EN2 0NS	X
	x
EN3 5UH	X
EN3 6XA	X
EN3 6XA	X
EN1 1QG	X
EN2 9BZ	X
EN2 8BJ	I have lived in Enfield 70 years and I am passionate that my children and grandchildren can enjoy the beautiful green belt that I enjoyed as a child and now.
EN1 4LZ	X
EN2 7BS	X
EN1 1QG	X
EN1 3RE	X
EN2 9DB	X
EN2 7JN	X
EN1 2JA	Have a business in Crews Hill – which brings people to the area from all over North London and surrounds.
EN2	Losing of jobs unexceptable
N9 9JE	Enfield's green spaces should be protected for the future
EN2 7JN	x
[117]	
HA postcodes	
HA8 8TA	I come to this area not only for the lovely garden centres but for its nature and beauty that I can no longer find on my doorstep
HA9 6LY	X [Wembley]
HA9 6LY	x
HA9 8LZ	The garden centre are great. Don't build homes here! [Wembley]
HA4 0SG	Excellent shops. Fantastic garden centres. Nothing else like it. [Ruislip]
HA8	Best garden centres and shopping [Edgware]
HA3 0HN	X
HA3 0HN	x
HA8 5TA	X
HA7 2RT	x
[10]	
IG postcodes	
IG3 7HN	X [Ilford]
IG9 5TR	X [Buckhurst Hill]
IG10 1DZ	X [Loughton]
Loughton	Retain Green Belt land and excellent gardening facilities
Loughton	We have been coming up to Crews Hill for 30 years. It is so beautiful

IG10 1BL	Such a shame that this beautifully country place will be no more.
[6]	
HP postcodes	
HP3 0QH	X [Bovingdon]
HP3 0QH	x
HP1 3NN	Come here for all my garden needs. Plus grandchildren come for Christmas Santa. [Hemel Hempstead]
[3]	
CM postcodes	
CM16 6NF	X [Epping]
CM16 6NF	We visit here 7 times a year. [Epping]
CM20	Handy place to visit for all kinds of stuff [Harlow]
CM22 6TN	x
CM4 9AR	Always visiting the many garden centres at Crews Hill for plants, fish and social occasions. People need places like this to visit. [Ingatestone]
CM22 7FH	I visit Crews Hill often [Hatfield]
CM22	I visit Crews Hill regularly [Hatfield]
CM17 9MG	I visit Crews Hill on a regular basis. It would be devastating to build house on the Green Belt. [Harlow]
CM17 9RG	More space required, not more housing. [Harlow]
CM19 5HW	Lovely place to browse
CM19 5HW	X
CM17 9GP	X
CM22 6RH	X
CM3 6DE	X
CM23 3RE	Have been coming here for years, from child to adult
[15]	
NW postcodes	
NW4 4XB	Crews Hill is a hub for gardening. Shame for it to be gone.
NW4 2TH	I work in the area. The development of Enfield will affect negatively my job and career.
NW1 2BU	X
NW6 5FL	x
NW6 5FL	x
NW3 3HA	X
NW11 7 TH	This place is used by hundreds and thousands! Keep it going!
NW9 8DS	x
[8]	
N postcodes outside Enfield	
N12 9LE	x
N12 9HP	Long time visitor. Best garden centres around.
N12 9HP	This is the only place I can come to purchase plants, etc. in the North London area. Have been coming here for over 60 years.
N11 3BY	x
N17 7BJ	x
N12 7DE	X [Barnet]
N16 5SC	X [Stoke Newington]
N15 6HH	Crews Hill is a good place to find fun plants for the whole commute around
N20 0PL	It gives green space to London and we don't have much.
N4 3RT	I visit Crews Hill Garden Centres regularly.
N22 7XG	x
N20 0UU	x
N20 0UU	x
N7 7JY	I am a frequent recreational visitor to Enfield. I can use my Oyster car to visit Crews Hill also. I do a lot of walk around here. It's a lovely resource for inner London residents.
N22 5RD	x

N11 3BY	Have lived in this area for all my life. Would be very sad to see it go.
N17	X
N22 5RD	x
N11 1FQ	X
N11HN	We love coming here for supplies of our little green oasis. It would be a shame if these centres would close. We need nature around us for our well-being and mental health.
N22 8PW	X
N1 1HN	The garden centres are an important part of Enfield! Please don't re-develop these areas!!
N2 0TE	X
N19 5YJ	X
N5 2SU	X
N5 2SU	Like to visit every Sunday to shop and eat.
N4 4ST	Been coming to Crews Hill for a number of years for fish and gardening supplies.
N4 4ST	X
Tufnell Park	x
N11 1HN	X
N18 2RT	X
N8	Too important to local people for all sorts of reasons
N8 7NE	X
N8 9LU	The place has been our lifeline ever since I've discovered it. There is nothing else like it where you can shop for your garden, kitchen and home and look after your well-being too!
N9 7PL	Enfield Council. You are a disgrace thinking getting your hands on green space. Where are the wildlife going to go? Tut
N11	A disgrace. Such a great area for visiting with family.
N17 6AH	Been visiting since I was 5. Sad that my kids will not be able to visit my childhood pastimes.
N18 1XD	Open space, suitable for younger generation
N20 0AJ	X
N20 0AJ	x
[40]	
E postcodes	
E4 8AD	Many years of visiting open spaces would be a shame to see this go!
E7 0UE	x
E7 0JE	We so enjoy coming here to purchase the flowers/ plants + for the cemetery. It is much needed.
E17 7FE	x
E17 7FE	x
E4 9LR	We love to come to CrewsHill. An oasis of fresh air and green space.
E4 9LR	x
E3 4QF	I've been coming to Crews Hill for over 30 years and it's a beautiful place
E3 3EU	A lovely place to visit
E4 8HU	X
E4 6LH	x
E4 7HU	Crews Hill should remain as it's the best facility in the area
E4 7HU	X
E4 7ER	X
E4 7ER	X
E17 6AS	X
E7 8HE	X
E3 2NX	x
[18]	
AL postcodes	
AL7 4DT	Super convenient, perfect location and plenty of other place to build! [Welwyn Garden City]
AL7 4DT	x
AL4 OPS	This is our favourite place!! How very dare you!! [Colney Heath]
AL9 6HB	X [Essenden]
AL10 OPF	Supports local community [Hatfield]
AL2 1LQ	Lots of variety, have bought lots here over the years. [London Colney]
AL4 OPH	X
AL4 0OH	Local, child friendly, reasonable priced
AL2 3JC	X
AL4 9LY	X
AL4 9LY	X
AL10 9HP	X

AL10 9HP	X
AL7 4RY	X
AL8 7AL	X
AL7 2JA	x
[15]	
RM postcodes	
RM9 6NB	X [Dagenham]
RM6 5TJ	The variety of outlets mean choice unavailable elsewhere
RM1 4NS	I have been coming here to the garden centres for many years and would be very upset to see them go to make way for more homes. [Romford]
RM11 5JS	X
RM8 2XH	Only good garden centre
[5]	
SG postcodes	
SG2 0LX	A great selection of garden centres which enables competitive prices [Stevenage]
SG6 3HQ	Good for garden centres [Letchworth]
SG13 7QN	Garden Centers, best fish stores [Hertford Heath]
SG1 5PY	I work in the garden centre Crews Hill [Stevenage]
SG6 2LJ	X [Letchworth]
SG4 8UD	It would be a massive loss of local amenities
SG8 6GH	X
SG8 6GH	X
SG4 8UD	x
SG2 9DA	X
SG1 1BN	X
SG13 8RA	In my view Cattlegate Rd provides essential local shopping.
[12]	
WD postcodes	
WD6 1SZ	Crews Hill is a fantastic place to shop and it will disgrace to remove it. [Boreham Wood]
WD6 5JS	X [Borehamwood]
WD6 5JS	x
WD25 9SD	X
WD5 0JB	x
WD5 0JB	X
WD6 4PL	The Green Belt should be exactly as it says – Green Belt. There is too much development of such land.
WD6 3JU	This is a wonderful area for families to enjoy. It would be a shame to destroy something so important to the community
WD24 5NJ	To keep shops open to continue to replant and help climate
[9]	
LU postcodes	
LU5 4EM	We travel every weekend to visit the shops in this area. People enjoy this community all friendly. Do not take it away.
LU5 4EM	This area is important to us and the local economy. An excellent selection of niche shops and a breath of fresh air just outside London. Development would ruin this place. [Dunstable]
[2]	
CO Postcodes	
CO16 0HD	X
CO16 7HD	x
[2]	
MISC	

OX13 6DD	Brilliant garden centres [Wootton, Oxon]
Welwyn Garden City	x
SS15 6AW	x
SS15 6AW	Must not lose more green space
W1W 5DF	x
UB6 8HB	x
RG2 6AL	x
CV8 1FQ	X
CV8 1FQ	x
[9]	
TALLY FOR FIRST DAY	TALLY FOR SECOND DAY
Enfield postcodes 39	Enfield postcodes 78
EN non-Enfield 31	EN non-Enfield 40
IG 2	IG 4
Misc 2	Misc 7
HA 6	HA 4
NW 5	NW 3
RM 3	RM 2
WD 3	WD 6
LU 2	LU 0
AL 5	AL 10
HP 3	HP 0
E 9	E 9
N non-Enfield 18	N non-Enfield 22
SG 5	SG 7
CM 9	CM 6
CO 0	CO 2
TOTAL 142	TOTAL 200 [weekend total 342]