

Dear Mayor,

## **A response to the Mayor's draft London Plan consultation**

Thank you for the opportunity to respond to this important consultation.

**Enfield RoadWatch** is an action group based in the London Borough of Enfield. We are working to protect parts of the borough's Green Belt from de-designation during the Local Plan revision process and beyond as well as promoting the benefits of Green Belt and open spaces overall. We have a local supporter base of over 1,000, much wider support nationally and we work closely with other local and national organisations, including the CPRE and the London Green Belt Council. We are primarily concerned with the protection and enhancement of Enfield's Green Belt, Metropolitan Open Land and urban open and green spaces, but we also have a wider interest in parks and open spaces, green infrastructure and compact development throughout London and adjoining areas.

We agree with and endorse the comments and proposed changes suggested by CPRE, London Green Belt Council, Woodland Trust and the Wildlife Trusts and would like to reinforce the following items.

### **Green Belt**

We welcome **Policy G2** and particularly the proposal in **Policy G2B** that 'de-designation' of Green Belt will not be supported. However, this policy needs to be enforced for it to be effective. The release of Green Belt land is being proposed in numerous locations across London and we are concerned that release will be proposed in Enfield's revised Local Plan. The GLA needs to be able to follow up on this commitment and to object effectively to any proposals for Green Belt release.

We suggest the following change to the wording of **G2B**:

**The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt.**

### **Metropolitan Open Land**

We are concerned about policy **G3C** which allows land swaps. The open nature and environmental qualities of MOL are constantly being eroded by damaging proposals for inappropriate development. Strong policies are therefore required to halt such speculation and opportunism, rather than policies which are likely to mean that that it is acceptable to build on this land even if lesser quality MOL is created an unspecified distance away.

- Land swaps undermine the 'essential characteristic' of permanence, as set out in paragraphs 79-92 of the National Planning Policy Framework (NPPF), which as stated in paragraph 8.3.2, applies to MOL as it does to Green Belt.
- The proposed policy states the MOL resulting from a swap should meet 'at least one of the criteria set out in Part D', which could easily be read as 'only one of the criteria'. This means the resulting MOL is highly likely to be qualitatively considerably less valuable.

- The principle of land swaps creates a loophole that will be exploited by developers and others in ways that reduce the contribution of MOL to quality of life in London.

We suggest the following changes to the relevant sections:

**Delete Policy G3C** and the sentence in paragraph 8.3.2 which reads: *The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy.*

**Amend Policy G3B** to read: **The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.**

## **Biodiversity**

The approach to biodiversity and access to nature outlined in **Policy G6** needs to be strengthened to avoid the loss of valuable habitats and wildlife. All Sites of Importance for Nature Conservation (SINCs) should receive the highest level of protection because it is not practically possible to offset their loss elsewhere.

We suggest the following change to policy **G6**.

**Delete** the second sentence in sub-section A and the whole of sub-section C. Insert the following sentence at the beginning of sub-section D **‘All new development should seek to enhance biodiversity.’**

## **Trees and hedgerows**

Mature trees are a vital part of London’s green infrastructure and there should be strict controls over felling them in **Policy G7**, along with recognition of the importance of established hedgerows. The environmental and ecological benefits of the older growth cannot be easily or quickly replaced.

We suggest the following changes to **Policy G7**.

**Subsection B 1)** should be amended to **give the strongest possible protection to veteran trees, mature hedgerows and ancient woodland, especially ...’**

The first sentence of **Policy G7(C)** should be amended as follows **“Development proposals should ensure that existing trees of quality, mature trees and hedgerows, and trees of value in terms of delivering eco-system services such as water or air quality management, are retained.**

We recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees (Woodland Trust, 2017, [woodlandtrust.org.uk/plannersmanual](http://woodlandtrust.org.uk/plannersmanual)).

## **Food Growing**

We support **Policy G8** but think it should be strengthened to encourage the productive use of existing agricultural land. Our borough, Enfield, has a considerable acreage of arable and grazing land, much owned by developers and all designated Green Belt, which has been left ‘deliberately’ unproductive. It should be returned to agricultural use with all the benefits that would bring in terms of food security, supporting the local economy, reducing transport emissions, addressing climate change and, with good stewardship, enhancing biodiversity. In addition there should be protection for the horticultural

industry, such as the nurseries at Crews Hill, also in the Green Belt, so that they can contribute more to the growth of local food.

We suggest the following changes to **Policy G8**

Add the following items to **G8 A**

- 3) **Encourage and facilitate food production and discourage unproductivity on agricultural land.**
- 4) **Ensure that horticultural sites are used for horticultural purposes only.**
- 5) **Promote, support and protect city farms.**

### **Making the Best Use of Land**

**Policy GG2** - We strongly support the intentions of making the best use of land. Land is a finite resource and the emphasis on making the best use of brownfield is applaudable. We also welcome the requirement for brownfield registers but would like to see more measures to ensure requirements are complied with consistently.

Overall, we are very pleased to see housing and other policies that support the protection of the Green Belt. We are also pleased to see the emphasis on Local Authorities needing to work together across boundaries when proposing changes which may impact on Sites of Importance and other designations across the wider London and South East Area.

We also welcome the Mayor's support for the London National Park City initiative which clearly demonstrates the diversity of our terrain and features. This includes distinct Areas of Natural Landscape which span several Local Authority areas. We would like to see a requirement for Local Authorities to consult with neighbouring bodies if any changes to these Natural Landscapes are proposed.

We would also like to see mention of Sites of Special Character in the body of the Plan. Whilst we appreciate that the designation of sites is the responsibility of individual Local Authorities, we would welcome some protection for these sites in the Plan. The sites are given designation for a purpose, whether for outstanding features, contribution to local landscape, protection of nature or Green corridors and recognition by Local Authorities of their importance should be formally encouraged.

We attended the sub-regional meeting in Enfield and felt that the GLA team successfully addressed concerns expressed by the LBE representative in terms of industrial land, mixed-use redevelopment of outdated retail sites, such as the retail park on the A10, and other issues. We trust that the GLA will require Boroughs to produce complete Sites Allocation documents and will follow up to make sure that policies are being adopted and followed.

I hope these comments are helpful.

Yours sincerely

Ian D'Souza and Carol Fisk

Chair and Vice Chair  
Enfield RoadWatch  
EN2 7JN