

Better Homes Enfield

26th July 2021

By email

Dear 

We are writing to you to express our concerns about the Local Plan Consultation.

Our main concerns are as follows:

- The consultation has been running for five weeks, yet key information is still missing. This makes it impossible to give a fully considered response to important elements of the Plan. For example, figures 6.1, 6.2, 6.3, 6.4 and 9.1 are all missing.
- Despite several requests, the missing information has still not been provided. It is frustrating that you are aware of this issue and know that we require these maps, but you and your team have still not provided any of the missing information.
- Key information is presented in a way that appears designed to prejudice the consultation responses. For example, the 'pros' and 'cons' of the alternative spatial options have been set out in the Plan (e.g. at Tables 2.2 and 8.3), but these have not been presented in an objective and even-handed manner. There are 'cons' missing from the council's preferred option, whilst 'pros' are missing from the alternative options.

Presenting key information in this way appears to be an attempt to influence and lead public opinion towards supporting the council's preferred option, which undermines the validity of the consultation process.

- There are significant inconsistencies in the documents. For example, claims made in the Integrated Impact Assessment regarding the sustainability of the Vicarage Farm site are contradicted by the Transport Assessment in the Evidence Base. There are lots of other examples. These inconsistencies regarding fundamental aspects of the Plan are troubling and call into question the Plan's legitimacy and undermines the public consultation process.
- Key elements of the Plan are inaccurate. For example, the Growth Topic Paper says that Development of the Green Belt allows the borough to deliver **at least** 50% of housing on Green Belt sites as affordable housing products. This is incorrect. The Whole Plan Viability Assessment says **up to** 50% could be achieved and caveats this estimate (e.g., it does not include site specific infrastructure costs, which could be significant). "Up to" 50% with caveats is very different to "at least" 50%.



- The Plan includes a lot of jargon and acronyms, which reduces the potential for public engagement and understanding. Here is one example: the IIA says “*As explained later in this chapter, the SA, SEA, HIA, EqlA and CSIA have been undertaken together as part of the IIA. Therefore, **for simplicity** within this report we mostly refer just to the IIA, which should be taken as incorporating SA, SEA, HIA, EqlA and CSIA.*” There are lots of other examples.
- The questions within the consultation itself are poorly drafted, full of planning speak and are hard to understand. They appear to be designed to put the general public off responding, rather than to encourage positive engagement.
- The sheer volume of information is overwhelming and off-putting and reduces the potential for meaningful public engagement. There are now more than 65 documents to review, many of which are several hundred pages in length.
- Important documents have been added to the evidence base, weeks after the consultation started. This is happening without notification or correspondence with people signed up to receive updates about the Local Plan.
- Maps provided within the main consultation document are of such poor quality that key information cannot be read. For example, the indicative maximum heights on Figure 7.4, (which is referred to eight times in the Local Plan), is illegible. This makes it impossible to understand what is being proposed.
- Information on some maps is incorrect. For example, in Figure 3.1 Enfield Town is labelled as Southbury, and New Southgate is labelled as Enfield Town. There are numerous other examples of this type of inaccuracy. These errors create confusion, make the Plan difficult to understand and undermine confidence in the Plan.
- Comments in the Plan and supporting documents give the impression that the authors do not know Enfield. For example, the Growth Topic Paper says the University of Middlesex campus is located in Trent Park, which it vacated in 2012. Inaccuracies about basic local information undermines confidence in the Plan and the Plan’s authors. It also highlights the importance of meaningful early engagement with local people who have valuable local knowledge
- Information shown on some maps is inconsistent with other documents in the Evidence Base. For example, the Local Plan Policies Map shows SIL intensification areas within Southbury that are not shown in the Map of Southbury within the Local Plan itself (Figure 3.3). This makes it impossible to understand what is actually being proposed.
- The Plan includes misinformation. As you are aware, the London National Park City Foundation has written to Enfield Council to say that references made to them in the Plan about the Foundation’s aims and objectives are “incorrect” and “misleading”.

It is troubling that the council has so frequently referred to the London National Park City Foundation in the Plan, without first seeking the charity’s approval. ‘National Park City’ is mentioned at least 38 times in the Plan and many more times in the Evidence Base documents (e.g. a further five times in the Growth Topic Paper and six times in the Chase Park Placemaking Study).

We believe that the extent and nature of this misinformation goes far beyond what might be considered reasonable ‘human error’ and calls into question the validity of both the Plan and the consultation.



The issues identified by the London National Park City Foundation have not been rectified. This needs to happen so that the public are not provided with misinformation.

These are just a few examples of some of the issues we have encountered so far whilst attempting to write a considered response to the Local Plan consultation. We have identified many more issues than those given above.

We were also very concerned to read the council's recent response to the letter from the London National Park City Foundation, which was reported by Enfield Dispatch last week.

The council says in its response that "***We reject any suggestion we have linked the National Park City concept with the draft Enfield Local Plan preferred option ...***". This response is nothing short of extraordinary and seems to us to be highly misleading.

The council has clearly linked the National Park City concept with its preferred option in the draft Plan. For example, in Table 2.2 of the Plan the National Park City is listed as a "key detail" of the council's preferred option, but not of any of the alternatives. It is also referred to repeatedly in the "Placemaking Vision" and within Strategic Policy PL8 (Strategic Policy SP PL8: Rural Enfield – a leading destination in London's National Park City). The National Park City concept is also directly linked with the council's preferred option in the Growth Topic Paper (see Table 5.1,) but not with any of the other 12 spatial options shown.

Furthermore, the council's claim that unless the Green Belt is built on, people will be packed "*into small units in dense towers with a lack of access to open space and supporting infrastructure*" is inaccurate and misleading. The use of emotive language appears to be an attempt to scaremonger. It is notable that even the Plan itself contradicts this claim, for example at 7.6.4 of the Plan it states that tall buildings are not the only solution to delivering high quantities of housing and refers to the benefits of viable alternatives.

In short, the council's public response to the letter from the London National Park City Foundation appears to be an attempt to distort reality, mislead the public and prejudice the consultation process.

The nature and extent of the issues we have encountered are serious, and it is our firm opinion that the Local Plan consultation documents in their current form are not fit for purpose.

It is also our opinion that the consultation is not being conducted positively and in good faith. It appears to us that the Reg 18 consultation process is being managed in order to achieve the council's desired outcome.

We will be providing a full response to the Local Plan policies in due course.

Yours sincerely,

Better Homes Enfield



CC.

Sadiq Khan, Mayor of London

Tom Copley, Deputy Mayor for Housing and Residential Development

Ian Davis, LBE Chief Executive

LBE, Local Plan email

