For approval at Full Council 15/05/2024

DRAFT Objection to Enfield Local Plan

Dear Sir

Regulation 19 representation Enfield Local Plan

This representation is made by Northaw and Cuffley Parish Council and follows on from our Regulation 18 representation made by Richard Buxton solicitors as our agent in 2021.

We can confirm that if invited by the appointed Plan Inspector we would wish to make representations in person to the Inspector.

Our concerns and comments focus on the proposals at Crews Hill, Local Plan policy PL11,as set out below.

Highway Impact

No assessment has been made of the impact on the local highway network from the proposed development at Crews Hill nor mitigation measures that may be required and how these might be funded. There will inevitably be a significant impact on roads through both Cuffley and Northaw as traffic from the Crews Hill development makes its way to the A1 and M25. The local road network is currently heavily congested during rush hours and these proposals can only make a bad situation far worse.

The Inspector appointed for the recent Welwyn Hatfield Local Plan commented on the level of congestion currently being experienced in Cuffley. The Highway Authority also agreed that mitigation measures would be required soon.

Research shows that in Northaw and Cuffley only circa 18% of residents travel to work by public transport with circa 70% using the car. There is no reason to believe that this modal split will be significantly different for a new community at Crews Hill, this being the case there will be heavy reliance on the car to access urban centres in all directions resulting in a significant rise in traffic across a wide area.

Rail Capacity

The Enfield plan takes a very simplistic approach to this issue in relation to the rail line at Crews Hill. To increase capacity, it is claimed all that is needed is a few extra trains during peak periods. This ignores the key issue that the Moorgate line is already over capacity and the problem is getting worse.

The separation time between trains on the Moorgate line is governed by the logistics of arrivals and departures at Moorgate together with the line being a shared track with the Welwyn Branch which merge at Alexander Palace which makes it impossible to put on extra trains at rush hours. These technical problems were highlighted in our regulation 18 representation but have still not been addressed within the plan.

The rational for the development at Crews Hill is the rail station, this supposedly makes it a sustainable location. However, the whole rationale is undermined by the

simple fact that there is no rail capacity, and it would be uneconomic or impossible to create the additional capacity that would be required in rush hours. In addition local analysis indicates there will be heavy reliance on the car as the preferred mode of transport.

Harm to the Greenbelt

Development at Crews Hill will include greenbelt sites between the M25 and Rail Bridge, this will include the golf course and grazing and farming land. A considerable loss of greenbelt land which Enfield consider to be of low to moderate value whereas it should be more appropriately be considered moderate to high value.

Closure of the Gap between Enfield and Northaw and Cuffley

Development up to the M25 bridge at Crews Hill will close the gap between built development in Enfield and Northaw and Cuffley something that the greenbelt was meant to preserve. Development at Crews Hill should not extend beyond the railway bridge with the rail line becoming a natural existing boundary.

Sustainability

The proposals at Crews Hill are in a remote rural location and a significant distance from current urban centres. The Plan intends that this location disadvantage would be overcome by making it a self-contained community through establishing a critical mass.

The proposals at Crews Hill will create a new community significantly larger that the combined communities at both Northaw and Cuffley with a population similar to Potters Bar. The travel characteristics of the new community will be broadly similar to those of the current community in Northaw and Cuffley with travel to work patterns being public transport 18% and car 70%.

There are no significant nearby employment areas, and it is unrealistic to assume that the residents of Crews Hill will work and shop within the proposed development. The development at Crews Hill will be highly dependent on the car and it is inappropriate to consider the proposals at Crews Hill to be sustainable.