

Hadley Wood Neighbourhood Planning Forum  
Representation to Regulation 19 Enfield Local Plan

## **Attachment 5**

### **Sustainability Audit**

# Sustainability Audit of RUR.02: Land between Camlet Way and Crescent West

Draft Enfield Local Plan 2019-2041

**Hadley Wood Neighbourhood Planning Forum**

March 2024

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# 1. INTRODUCTION

- 1.1 The 'Enfield Local Plan Regulation 19' consultation document includes three policies that are predicated on sustainability grounds. These are:
- (a) proposed residential allocation RUR.02: Land between Camlet Way and Crescent West;
  - (b) Policy DE6 Tall Buildings; and
  - (c) Policy H4 Small Sites and Smaller Housing Development.
- 1.2 This Sustainability Audit provides a review of current social infrastructure, community facilities and services in Hadley Wood. In particular, it highlights those facilities in close proximity to site RUR.02.
- 1.3 The purpose of this Sustainability Audit is to consider the level of local services and facilities provided in the locality concerning education, healthcare, open space, shopping, sports and leisure and community services and to consider how the social and community infrastructure needs of the rising population can be met.

## **Site Context and Allocation**

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- 1.4 Proposed residential allocation RUR.02 comprises 11.05 hectares of agricultural land to the north of Camlet Way and west of Crescent West, in Hadley Wood. It is located within the Cockfosters Ward of the London Borough of Enfield ('LB Enfield') and is indicatively allocated for an estimated 160 homes. The site is located within the Green Belt and according to the Environment Agency Flood Map for Planning, especially the area around Monken Mead Brook is located within Flood Zone 3. The site is furthermore adjacent to the Hadley Wood Conservation Area and the Monken Hadley Conservation Area, is within the setting of various Grade II heritage assets and is in an Archaeological Priority Area.

**Figure 1: Site Location**



## **Methodology**

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- 1.5 This assessment combines analysis of the provision and capacity of the local community facilities and services within approximately 800m from the site. The National Design Guide<sup>1</sup> (NDG) defines “Walkable: Local facilities are within walking distance, generally considered to be no more than a 10-minute walk (800m radius)”. Note that, following the example of LB Bexley’s Local Plan, distance is measured following actual pavements/roads, rather than ‘as the crow flies’.
- 1.6 The document incorporates an audit of the following facilities and the regular activities undertaken within these facilities:
- **Educational facilities** – Early years and childcare, primary, secondary, further education;
  - **Healthcare facilities** – GP surgeries, dental practices, hospitals;
  - **Community facilities** – Community halls/centres, youth centres, libraries, places of worship, fire and police services;

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<sup>1</sup> National Design Guide (updated January 2021) - Ministry of Housing, Communities & Local Government

- **Leisure facilities** – Sports facilities, play space and open space;
- **Retail** - Shops, banks, cafes, restaurants, public houses and post offices;
- **Green Infrastructure** – Play space, Sports facilities, Open-space, Allotments; and
- **Sustainable transport provision** – Bus, underground services, railway services, walking and cycling routes.

### **Assumptions and Limitations**

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1.7 Both assumptions and limitations are highlighted where relevant throughout this assessment. Government and Local Authority data has been used to inform this assessment, including the Indices of Multiple Deprivation (2019), and the following published datasets and documents:

- LB Enfield data, policy documents and strategy documents;
- EduBase Public Portal for education facilities;
- NHS Choices for healthcare facilities; and
- Sport England’s Active Places Power database for sports facilities.

1.8 The sources used are referenced throughout. Furthermore, while the latest available data has been used, it should be noted that many data sources are frequently updated and could be subject to change since the time of drafting.

## 2. PLANNING POLICY CONTEXT

2.1 This section briefly reviews the policy context relating to community infrastructure at the national and local levels.

### National Planning Policy

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#### National Planning Policy Framework (2023)

2.2 The Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework (NPPF) in December 2023. Section 8 of the NPPF highlights how planning policies and decisions should aim to achieve healthy, inclusive and safe communities through promoting social interaction, providing safe and accessible neighbourhoods and enabling and supporting healthy lifestyles.

2.3 Paragraphs relevant to this Sustainability Audit are:

- **Paragraph 8** - considers the important social role that planning plays to secure sustainable development.
- **Paragraph 9** - plans and decisions need to take local circumstances into account so that they respond to different opportunities for achieving sustainable development in different areas.
- **Paragraph 11** – plans and decisions should promote apply a presumption in favour of sustainable development. For plan-making this means that all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- **Paragraph 96** - planning policies and decisions should promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for multiple connections within and between neighbourhoods, and active street frontage;
- **Paragraph 97** - planning policies and decisions should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services;

- **Paragraph 99** – highlights it is important to provide sufficient choice of school places to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meet this requirement; and
- **Paragraph 103** – highlights existing open space provision should not be built on unless the proposed assessment would provide a replacement that is equivalent or better in terms of quantity and quality.
- **Paragraph 123**- planning policies and decisions should promote effective use of land in meeting the need for homes and other uses while safeguarding and improving the environment and ensuring safe and healthy living conditions.

### **National Design Guide (2021)**

2.4 The Ministry of Housing, Communities and Local Government published the new National Design Guide in October 2019 and it was most recently updated in January 2021. This guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice.

Definitions relevant to this sustainability audit are:

- **Accessibility:** The ability of people to move around an area and reach places and facilities, including older and disabled people, those with young children and those carrying luggage or shopping.
- **Walkable:** Local facilities are within walking distance, generally considered to be no more than a 10-minute walk (800m radius).
- **Destinations:** Places or facilities that people want to visit. In a neighbourhood, these may be transport hubs, open spaces, local services such as schools, shops, healthcare or community facilities.

### **Regional Planning Policy**

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#### **The London Plan (2021)**

2.5 The new London Plan was published and formally adopted by the mayor on 2<sup>nd</sup> March 2021 and sets out the new spatial development strategy for London.

- **Policy GG1 Building Strong and Inclusive Communities** outlines that developments must provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities.



- **Policy GG2 Making the best use of Land** echoes the previous policy by stating that sites should be priorities that are well-connected by existing public transport, jobs, services, infrastructure and amenities.
- **Policy D2 Infrastructure requirements for sustainable densities** states that where there is the insufficient capacity of existing infrastructure to support proposed densities, Boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time.
- **Policy S1 Developing London’s social infrastructure** states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.
- **Policy T1 Strategic approach to transport** draws upon the mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. Therefore, new developments should make the most effective use of land, reflecting the connectivity and accessibility by existing and future public transport routes.
- **Policy T2 Healthy Streets** follows on from the previous policy by stating that development proposals should demonstrate how they will deliver improvements that support the ten healthy street indicators that reduce the dominance of vehicles on London’s streets.

### **Social Infrastructure SPG (2015)**

- 2.6 The 2015 adopted Social Infrastructure SPG provides guidance on a wide range of services that contribute to the quality of life such as health, education, community, cultural, faith, recreation, and sports facilities. As echoed in the London planning policy, the accessibility of social infrastructure to all sections of society is stressed as is the location of facilities being made accessible by walking or public transport.
- 2.7 The guidance emphasizes the need for planning across services to ensure social infrastructure meets the broader built environment aims of the London Plan.

### **Local Planning Policy**

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#### **Enfield Local Plan – Regulation 19 consultation version (2024)**

- 2.8 This version of the Local Plan 2019-2041 was published for consultation in March 2024 and provides the Council’s proposals for where and when this growth and enhancement can be delivered.

2.9 Policies relevant to this Sustainability Audit are:

- **Policy SS1 Spatial strategy** – States that the overarching spatial strategy for the Borough is to provide sustainable growth with supporting infrastructure. Therefore, development should be high quality, well designed with a focus on urban areas.
- **Policy SS2 Making good places** – Echoes the previous policy by outlining that all developments should positively contribute towards sustainable development that enhances the Borough's character. All developments should be inclusive, accessible and make a positive contribution to the lives of Enfield's communities.
- **Policy SE1 Responding to the climate emergency**- Outlined in this policy is the Council's aim to use all the planning tools available to meet the 2040 net-zero carbon borough commitments as set out in the Climate Action Plan.
- **Policy SC1 Improving health and wellbeing of Enfield's diverse communities**- Proposal are expected to contribute to healthy and active lifestyles and include measures that will help to reduce health inequalities. Examples of how this can be achieved include access to sustainable modes of travel, access to green infrastructure and access to leisure and recreational facilities.
- **Policy SC2 Protecting and enhancing social and community infrastructure** - Seeks to secure the timely provision of new or enhanced community facilities in association with development to meet the changing demands and identified needs of the Borough's population, preferably towards the defined town centres.
- **Policy DE1 Delivering Well-designed, high quality and the resilient environment**- Stated in this policy is the need for all developments to be high quality and design-led. This includes development being accessible, inclusive, and well connected with other places. Developments should be people should be priorities over private vehicles and integrated with sustainable modes of transport.
- **Policy BG4 Biodiversity net gain, landscape restoration and offsetting**- development is considered against the need to protect the most valuable ecological features of the site and minimise harm to nature. A minimum 20% net biodiversity gain must be achieved.
- **Policy BG5 Green Belt and Open Land**- In conjunction with the NPPF, Enfield Green Belt and Metropolitan Open Land will continue to be protected from inappropriate development and, where possible, enhanced. Developments that are adjacent to the

Green Belt should not have a significant detrimental impact on the openness of the green belt and respect the character of the surroundings.

- **Policy BG8 Protecting Open Space-** Following Policy BG5, the Local Plan states that development involving the loss of designated open space will be resisted unless new outdoor spaces can be provided or provided essential ancillary facilities.
- **Policy T2 A healthy and connected Enfield-** Development will be expected to support the healthy street approach. Included within this are measures that encourage a shift to active transport modes and an increase in cycling and walking, particularly for journeys under 2km. Overall, the removal of road traffic and prioritising active travel measures over car journeys should be encouraged.

#### **Enfield Characterisation Study**

- 2.10 The 2011 Enfield Characterisation Study categorises Hadley Wood as a residential and large suburb that retains a rural character. The Study also notes the very low density of the area which is favourable to requiring a car. The lack of local shops and facilities is also noted as well as the poor pedestrian access.

### 3. SOCIAL INFRASTRUCTURE AUDIT

3.1 This section considers the current level of provision of education, shopping, healthcare services, open space, sport and recreation facilities and community facilities proximate to the application site. As set out above, an area of 800m surrounding the site has been assessed in this infrastructure audit, as it reflects a reasonable walking distance according to the National Design Guide.

#### Demographic Profile

3.2 Based on ONS 2019 mid-year population estimates, the total population of the Cockfosters Ward - where the Strategic Allocation is located - had a population of 14,373. This was 4.3% of LB Enfield’s total population.

#### Age Profile

3.3 **Figure 2** provides a comparison of the population age structure in the Cockfosters Ward and LB Enfield and London by five-year age bands. It shows that the proportion of people aged 50 and over is higher in the Cockfosters Ward (39.6%) than in the Borough (31.0%) and London (28.3%). Conversely, the Cockfosters area has fewer people aged under the age of 20 (22.9%) than the Borough (27.4%) and London (23.6%).

**Figure 2 Population Profile of the Strategic Allocation**



Source: ONS 2019 mid-year population

#### Strategic Allocation Estimated Population Yield

3.4 The Enfield Regulation 19 Local Plan outlines in the allocation of RUR.02 that the Site could provide 160 new homes. Assuming the strategic allocation follows the Enfield Regulation 19 Local Plan housing mix and tenure type, as outlined in **Policy H2 Affordable Housing** and

**Policy H3 Housing Mix and Type**, it is possible to estimate the population the allocation could generate via the GLA population Yield Calculator.

3.5 **Table 3.1** shows that the development would increase the population by approximately 460 people, 61 of whom would be considered 'early year children' (0 to 4 years old), 48 would be children of primary school age (5 to 11 years) and 37 would be secondary school age children (12 to 17 years old).

**Table 3.1 Estimated Population of the Strategic Allocation**

<b>Ages</b>	<b>Population Yield</b>
Ages 0,1,2,3 &4	61
Ages 5,6,7,8,9,10 &11	48
Ages 12,13,14 & 15	24
Ages 16 &17	13
Ages 18 - 64	307
Ages 65+	7
<b>Total Yield</b>	<b>460</b>

*Source: GLA Population Yield Calculator*

**Deprivation Profile**

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3.6 The English Indices of Multiple Deprivation (IMD) provides a ranking of local authorities to compare levels of deprivation across the country. The IMD combines information from nine domains - income, employment, education, health, crime, barriers to housing and services, living environment, income deprivation affecting children and income deprivation affecting older people - to produce an overall relative measure of deprivation.

3.7 The Site is located within Enfield 011D Lower Super Output Area (the boundary of this LSOA is shown in Figure 3 and Figure 4 below). This is ranked 27,233<sup>th</sup> out of the 32,844 LSOAs in the country, placing it within the 9<sup>th</sup> decile of deprivation (where the 1<sup>st</sup> decile is the most deprived and the 10<sup>th</sup> decile is the least deprived). **Table 3.2** provides the breakdown of the rank (out of 32,844 LSOA) and the decile (out of 10) for each of the seven domains of deprivations.

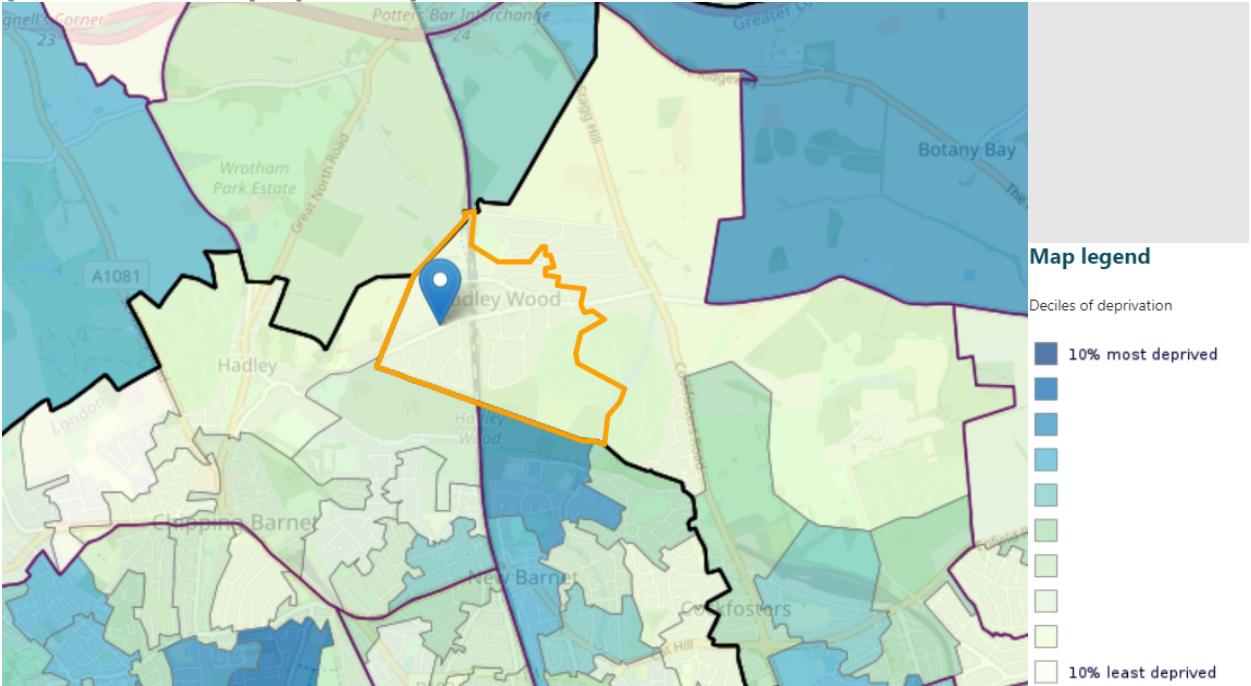
Table 3.2 The Domains of Deprivation for the LSOA Enfield 011D

Deprivation Domains	Rank (where 1 is the most deprived)	Decile (where the 1 <sup>st</sup> is most deprived 10% of LSOAs)
Income	31,696	10 <sup>th</sup>
Employment	31,513	10 <sup>th</sup>
Education, Skills and Training	30,926	10 <sup>th</sup>
Health Deprivation	31,679	10 <sup>th</sup>
Crime	27,584	9 <sup>th</sup>
Barriers to Housing and Services	1,210	1 <sup>st</sup>
Living Environment	24,447	8 <sup>th</sup>
<b>Overall IMD</b>	<b>27,233</b>	<b>9<sup>th</sup></b>

Source: Ministry of Housing, Communities and Local Government, 2019

3.8 **Figure 3** compares the Site’s LSOA Enfield 011D to the surrounding LSOAs. This shows that the adjacent LSOAs are also ranked in the least deprived LSOAs deciles. The exception is LSOA Barnet 002A, located to the south of allocation, which is ranked in the 30% of most deprived neighbourhoods.

Figure 3 Indices of Multiple Deprivation in LSOA Enfield 011D (orange boundary) - (location of site pinpointed)



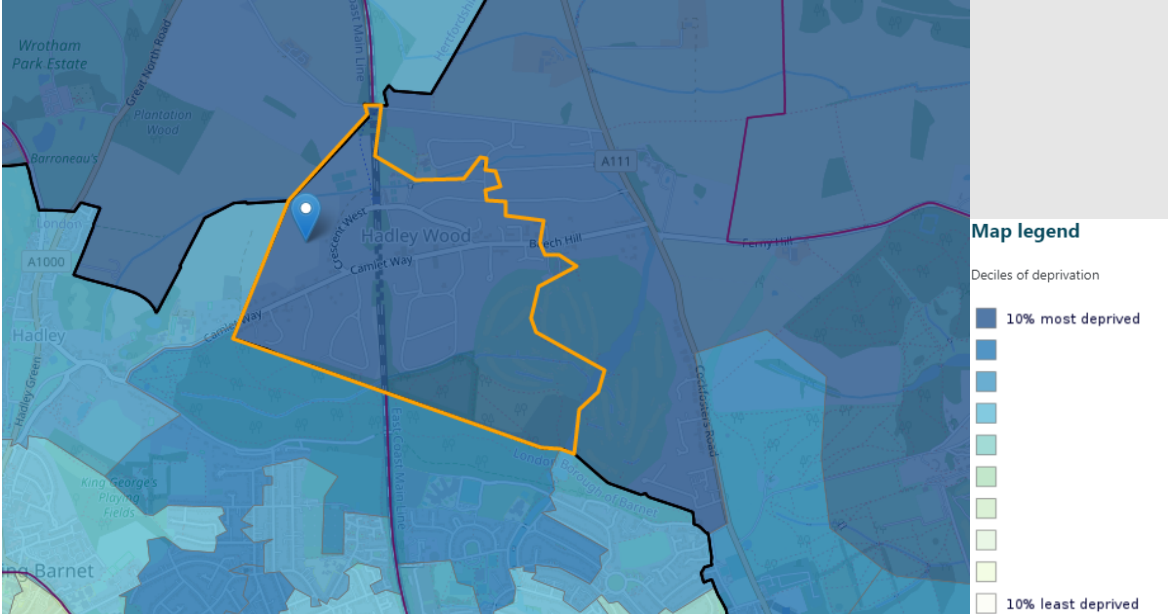
Source: English Indices of Multiple Deprivation 2019

3.9 Overall, the Site’s LSOA domains of deprivation are consistently within the least deprived. The exception to this is the ‘Barriers to Housing and Services Domain’ of the IMD that is ranked 1,210<sup>th</sup> out of 32,844 LSOAs in the country, which is 1<sup>st</sup> decile of deprivation.

3.10 This domain measures the physical and financial accessibility of housing and local services. Indicators fall into two sub-domains that relate to geographical barriers. The first is to the

physical proximity of local services and the second is related to 'wider barriers', which includes issues relating to access to housing, such as affordability.

**Figure 4 Indices of Multiple Deprivation - Barriers to Housing and Services Domain (location of site pinpointed)**



Source: English Indices of Multiple Deprivation 2019

### Education Profile

3.11 As the Local Education Authority, Enfield Council has responsibility for ensuring there are sufficient school places for every resident pupil that requires a school place. However, the strategic allocation site is located close to the boundary of the London Borough of Barnet. Therefore, the site is likely to be within the catchment areas of schools within both authorities.

### Early Years & Childcare

3.12 Early Years provision is provided in the borough through mostly privately run pre-schools and nursey groups, as well as a mix of nursey classes at local schools and children's centres. Most children's centres are in the east and south of the borough, whereas private nurseries are distributed evenly across the borough.

3.13 As outlined in the London Borough of Enfield, Childcare Sufficiency Assessment, 2018, the Cockfosters ward, where the strategic allocation is located, is within the top three wards where a waiting list was most frequently reported for 2-year-olds for all-day childcare. Equally, the

Enfield Draft Infrastructure Delivery Plan<sup>2</sup>, 2021, states that the Borough has below-average levels for achieving good cognitive development at age 5.

- 3.14 Within a walkable distance (800m) from the strategic allocation, two nursery schools provide early years care for 2- and 4-year-olds. The Ofsted reports for each of the early years facilities shows that there is the capacity for 8 more early years children at Hadley Wood Preschool whereas the Alphablocks Nursery is overcapacity. However, Hadley Wood Preschool and Playgroup will close down in summer 2024, with a replacement provider yet to be appointed.

**Table 3.3 Audit of early years provision**

<b>Name</b>	<b>Walking Distance (km)</b>	<b>Ofsted Rating (Date)</b>	<b>Age Range</b>	<b>Capacity</b>	<b>No. of pupils</b>	<b>Surplus or Deficit</b>
Hadley Wood Preschool and Playgroup	0.6	Good (2023)	2-4	46	38	+8 (closing in 2024)
Alphablocks Nursery School and Pre-Prep	0.8	Outstanding (2018)	2-4	32	33	-1
<b>Total</b>				<b>78</b>	<b>71</b>	<b>+7</b>

*Source: Ofsted Reports (2018-2023)*

- 3.15 The GLA population yield estimates that the strategic allocation could increase the demand for early years spaces by 61 spaces. Especially with over half of the capacity being uncertain after summer 2024, residents would have to consider facilities outside of a walkable distance, which would increase the reliance on car journeys to other facilities.

### **Primary School Provision**

- 3.16 The Emerging Infrastructure Plan for the Borough states that Enfield currently has a surplus of primary school places (5- to 11-year-olds), but there are spatial disparities in the level of supply across the borough and the primary schools that are increasing supply are not located in the vicinity of the strategic allocation.
- 3.17 One primary school is within the 800m walking distance from the strategic allocation Site. Using the Department of Education Database, Get Information about Schools, it shows that

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<sup>2</sup> Enfield Draft Infrastructure Delivery Plan (2021)



for the academic year 2019/2020 there were 210 primary school places offered. However, the school operated at 99% capacity level, with 1 space available.

**Table 3.4 Audit of early years provision for the academic year 2019-2020**

Name	Walking Distance (km)	Ofsted Rating (date)	Age	Capacity	No. of pupils	Surplus or Deficit
Hadley Wood Primary School	0.7	Good (2022)	4 – 11	210	209	+1

Source: Department of Education Data, 2022

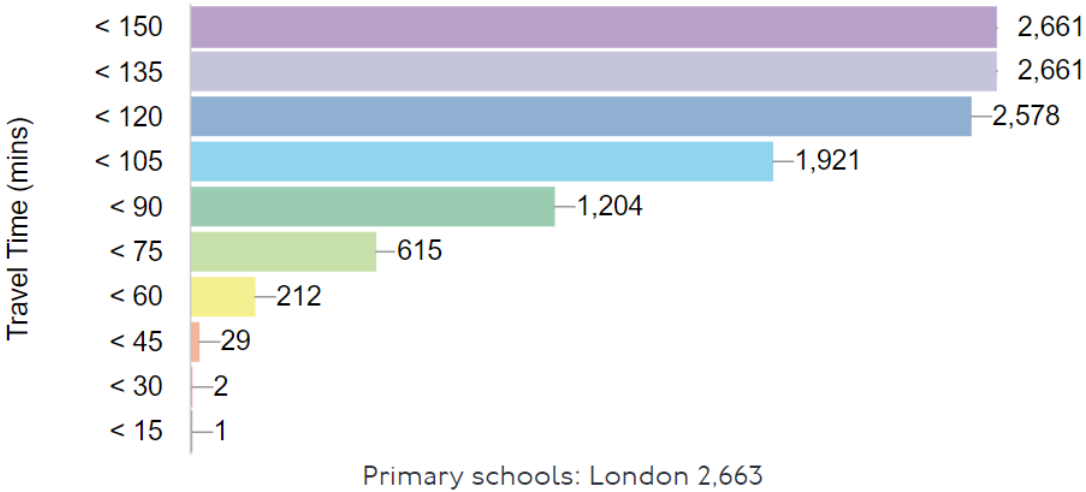
- 3.18 A more recent review of the Enfield Admission to Reception Classes, September 2023 Report<sup>3</sup>, shows that Hadley Wood Primary School had a total of 117 applications as at 17 April 2023, for only 30 admission places. We also understand from the school that in addition to the usual annual in-take, there is currently an additional waiting list to gain entry into the school of approximately 50 pupils.
- 3.19 As demand grows, the situation will likely worsen in the next few years. Moreover, it is anticipated, per paragraph 3.5 above, that there would be a further 48 primary school-aged children in the Area if Site RUR.02 is allocated and developed.
- 3.20 With no plans to expand the school, children from any new development in the area would be required to travel further to primary schools outside a walkable distance, causing an increase in car use at peak times as there is a very poor bus connection in the local area (the 399 route only runs once an hour between 10am and 2pm, Monday to Saturday, and only goes to the nearby Barnet Spires).
- 3.21 This is confirmed through the Transport for London (TFL) WebCAT time mapping planning tool that estimates from the strategic allocation travelling to a primary school via public transport<sup>4</sup> would take less than 30 minutes to reach 3 primary schools, but up to 45 minutes to reach 29 primary schools. This is a significant deterrent for parents/guardians accompanying their children to school and will likely, therefore, travel by car.

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<sup>3</sup> Admission to Reception, Autumn Term (2021) information about Waiting Lists, Appeals and Breakdown of Allocations for Community Schools, Academies and Free Schools In Enfield.

<sup>4</sup> TFL define all mode of public transport as the use of bus, bike or walking.

**Figure 5 TFL Travel time to primary school from the strategic allocation**



Source: TFL, 2021

**Secondary School Provision**

- 3.22 The Emerging Infrastructure Plan for the Borough outlines that there is a large and growing primary school population in the borrow, which will create pressure on secondary school provision, which it expected to become 'critical' in 2021. The Borough is therefore planning to open more entry forms at secondary schools, especially in the west of the borough, but there are no plans for additional schools near Hadley Wood.
  
- 3.23 There are no secondary schools within a walkable (800m) distance from the Strategic Allocation.
  
- 3.24 The closest Secondary School is the Jewish Community Secondary School (JCoSS) which is located a 3km walk to the south within the London Borough of Barnet. For the previous academic year, the school had an additional capacity for 27 secondary school-aged children. The nearest non-religious, co-educational, established comprehensive school<sup>5</sup> is East Barnet School located approximately 4.4km south in the London Borough of Barnet. According to Ofsted, the school is significantly over capacity<sup>6</sup>. The nearest non-religious, co-educational,

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<sup>5</sup> Located c. 3km from the Site is the Queen Elizabeth School for Girls, equally there is the Ark Pioneer School located 3.5km which is a new school and currently only provides secondary school spaces for Years 7 and 8. The East Barnet School is the closest non-religious, co-educational secondary school for school years 7 to 13.

<sup>6</sup> <https://reports.ofsted.gov.uk/provider/23/136658>

established comprehensive school within the London Borough of Enfield is Southgate School located approximately 4.5km to the southeast, and is operating at over 98% capacity<sup>7</sup>.

**Table 3.5 Audit of Secondary School Provision**

<b>Name</b>	<b>Walking Distance (km)</b>	<b>Ofsted Rating (Date)</b>	<b>Age Range</b>	<b>Capacity</b>	<b>No. of pupils</b>	<b>Surplus or Deficit</b>
Jewish Community Secondary School	3	Good (2022)	11-18	1,360	1,335	+25
East Barnet School	4.4	Good (2022)	11-18	1,350	1,421	-71
Southgate School	4.3	Good (2019)	11-18	1,531	1,515	+16
<b>Total</b>						<b>-30</b>

*Source: Department of Education Data, 2019-2022*

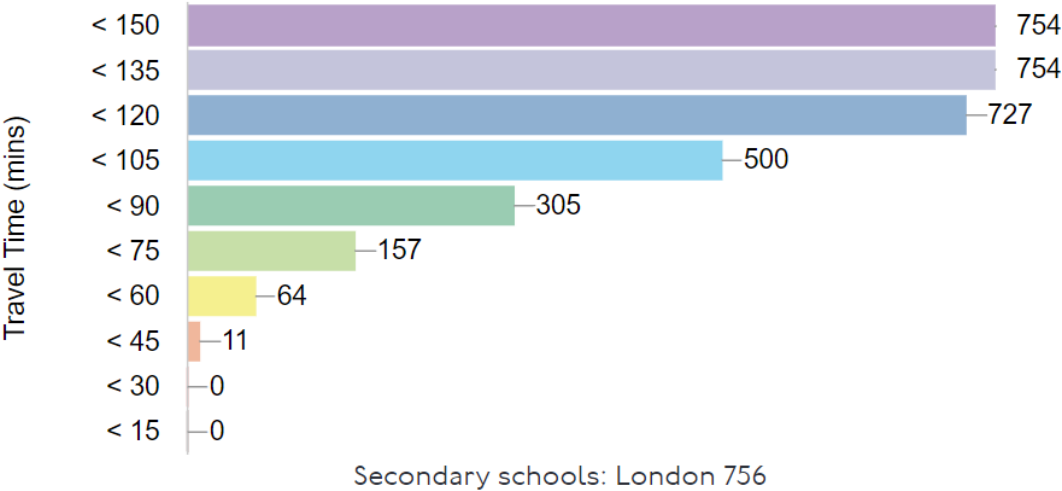
3.25 Per paragraph 3.5 above, the Strategic Allocation is anticipated to add 37 secondary school-aged children to the area. Therefore, this would put secondary schools in the area further over pupil capacity levels. In doing so, this will increase the already long journey time for secondary school-aged children, as they will have to travel even further to go to secondary school, which would inevitably generate more trips via cars. Not all parents will want their children going to a religious school and may prefer a non-religious co-ed school instead. Enfield Council would also be relying on LB Barnet to provide secondary education facilities for children living in the borough of Enfield.

3.26 This is confirmed in the TFL travel time establishments, which estimates that travel time via public transport to a secondary school would take 45 minutes from the strategic allocation.

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<sup>7</sup> <https://reports.ofsted.gov.uk/provider/23/142727>

**Figure 6 TFL Travel time to secondary school from the strategic allocation**



Source: TFL, 2021

3.27 Overall, this analysis indicates that there would not be sufficient secondary level education provision to accommodate needs.

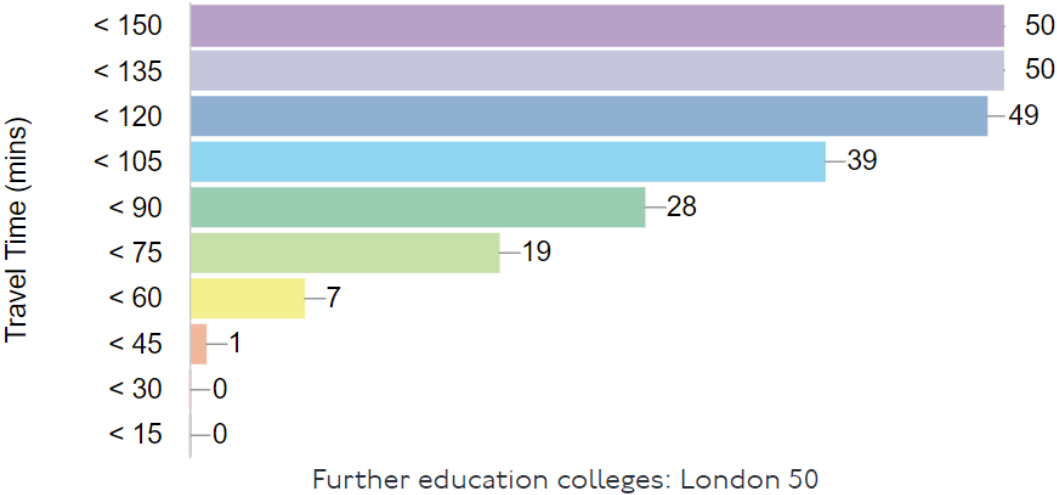
**Further Education Provision**

3.28 There are 17 sixth forms across the borough. As outlined in the Borough’s Emerging Infrastructure Plan, across London there is a rise in demand for further education as children move up from secondary school. Going forward, the borough will expand its further education through sixth form colleges, academies, and secondary schools to meet the forecast demand over the plan period.

3.29 The Barnet Southgate College is the only further education college in the area providing education for over 16-year-olds. Located over four campuses, the closest campus to the strategic allocation is the Wood Street facility that is located 2.1km away. This site offers A-Levels, Art and Design courses, Business and Travel, Childcare and Education, English and Maths as well as Science. The college pledges to offer guarantee every applicant a place on a suitable course, however, some courses are based on entry grade requirements.

3.30 Using the TFL travel time, it is anticipated that Barnet and Southgate College would take be a 45-minute journey time from the allocated site if using public transport. Again, Enfield Council will be relying on LB Barnet to provide this form of education to students living in the borough of Enfield.

**Figure 7 TFL Travel time to a further education college from the strategic allocation**



Source: TFL, 2021

**Healthcare**

3.31 Healthcare services are covered by the North Central London Clinical Commissioning Group, which is the statutory NHS body responsible for the planning and commissioning of health care services in the area.

**GP Surgery Provision**

3.32 Data provided by Public Health England show that across the Borough, there is an average of 1 GP serving 1,979 patients. This is above the recommended maximum of 1,800 patients per full-time equivalent GP which indicates there is insufficient capacity.

3.33 Within a walkable 800m radius of the Strategic Allocation, there are no GP facilities.

3.34 Parkfield Medical Centre in Potters Bar (4km distance away) is the closest GP practice within the patient boundary for Hadley Wood<sup>8</sup>. The surgery has 7 GPs serving 7,000 patients.

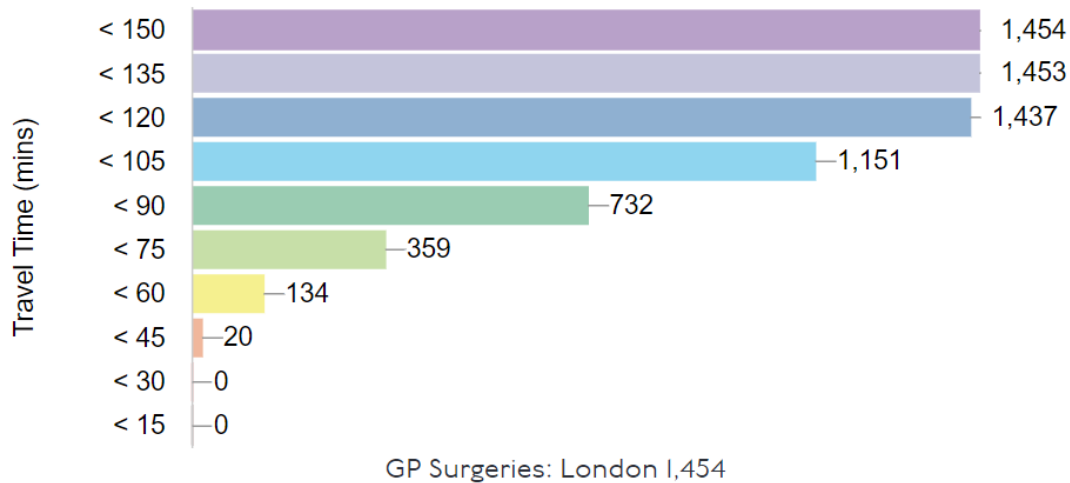
3.35 However, the proposed development is anticipated to add a further 460 people to the GP patients waiting list in the area. In doing so, this is increasing the pressure of GP practices and increasing waiting times.

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<sup>8</sup> The Addington Medical Centre (2km away) and The Old Court House Surgery (2km distance) are closer in distance but outside of the patient boundary catchment area for Hadley Wood.

3.36 Furthermore, the GP practices would increase car dependency in the area, due to poor public transport connections from the allocated site. TFL planning tool suggests that the nearest GP facilities are up to 45 minutes away when using public transport.

**Figure 8 Travel times to GP Surgeries from the strategic allocation**



Source: TFL, 2021

### Hospital Provision

3.37 The Strategic Allocation Site is 3km from Barnet Hospital. The Hospital offers acute medical services, including paediatrics, dermatology, and orthopaedics. The last Care Quality Commission Report conducted in 2021, stated that the Hospital requires improvement, particularly in the areas of safety and responsiveness.

3.38 TFL anticipates it would take over 1 hour to reach the nearest hospital using public transport.

### Dental Surgery

3.39 There are no NHS dental practices that are within a walkable distance from the strategic allocation.

3.40 The three closest NHS dental practices are all in the London Borough of Barnet and include Grove Dental Practice, approximately (2.0km distance), Barnet Dental Practice (2.2km distance) and Mona Lisa Smiles (2.8km distance).

### Community Facilities

3.41 This section explores the availability of community facilities on offer proximate to the site.

### **Places of Worship**

- 3.42 Within a walkable distance to the strategic allocation, there are three places of worship: Saint Paul's Evangelical Church (0.7km from the Site), Hadley Wood United Synagogue (0.7km from the Site) and Church House Monken Hadley (0.8km from the Site).

### **Community Halls**

- 3.43 Hadley Wood Association provide a village hall that can be rented out as a function venue. The association also act as a hub for the local community events, such as fireworks day celebrations and maintenance of the centres that provide the tennis club, pre-school (contract with existing provider terminated effective summer 2024, with no new provider appointed as yet, and bridge clubs.

### **Libraries**

- 3.44 There are no libraries that are within a walkable distance from the strategic allocated site. The closest library is Chipping Barnet Library (in LB Barnet) which is c.2.4km from the Site. As well as offering the books to loan, the library also provides computer use.

### **Emergency Services**

- 3.45 There is no police station in the area of the Strategic Allocation. The police station that serves Hadley Wood is located in Edmonton which is 11.6km away from the Site.
- 3.46 Barnet Fire Station is the nearest fire station located c.2.4km from the proposed Site. There is also an ambulance with a station located at this site.
- 3.47 The Emerging Infrastructure Plan states that there will be a further 3 ambulance stations in Edmonton, Ponder End and Chase Farm Hospital, as well as police, fire and rescue service provided at Enfield Town, Edmonton and Southgate.

### **Green Infrastructure**

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- 3.48 This section explores the accessibility to open space, sport and recreation facilities on offer near the site.

### **Open Space**

- 3.49 Contained with the Enfield Blue and Green Infrastructure Audit 2020, the Borough has set accessibility standards for residents to access open space. A Metropolitan Park should be no more than 3.2km away, a district park 1.2km and a local park 400m away. Local children's play space provision should be no more than 400m away, with allotments or community gardens being 800m away.

3.50 There are five areas of large open spaces within the accessibility standards of the strategic allocated site. There are children’s playgrounds on the HWA’s open space, next to the Primary School.

**Table 3.6 Audit of open space provision**

Name	Walking Distance (km)	Proposed Standard <sup>9</sup> (km)	Type of open space
HWA Open Space	0.6	0.4	Local park
Covert Way Nature Reserve	0.8	0.4	Local natural open space
Monken Hadley Common	0.9	0.4	Local natural open space
Hadley Green	1.3	3.2	Metropolitan Park
King George’s Field	1.3	0.4	Local natural open space

Source: Google Maps, 2021

### Sports Facilities

3.51 A review of the Active Power Places tool, which supplies data from Sports England, identifies a limited range of commercial sport and recreation facilities within an 800m walkable radius of the Site. Contained within this distance is Hadley Wood Tennis Club, providing 7 outdoor tennis courts.

3.52 Notably, the HWA have a sports pitch in their Open Space, which is used on an informal basis, but mainly by Mount House private school. The closest swimming pool and leisure centre is 1.6km away, in New Barnet Leisure Centre.

**Table 3.7 Audit of sports provision**

Name	Walking Distance (km)	Facilities
Hadley Wood Tennis Club	0.5	7 outdoor tennis courts

Source: Active Power Places, 2021

### Retail Facilities

3.53 There is one small convenience store in Hadley Wood, approximately 0.3km from the Strategic Allocation. The Londis shop sells a range of own-brand groceries, as well as off licence. There is a cluster of small food stores within Chipping Barnet, approximately 2.6km walk from the Site. This includes supermarket brands such as Iceland and Waitrose.

<sup>9</sup> Enfield Blue and Green Infrastructure Audit, 2020



- 3.54 Located adjacent to the Londis along the Crescent West Local Parade is a hair salon, interior design shop, a café, an estate agent and a private personal trainer facility.
- 3.55 The closest post office, bank and pub are also located in the Chipping Barnet High Street, which is approximately 2.6km walk away.

### **Sustainable transport provision**

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- 3.56 The site has a Public Transport Accessibility Level (PTAL) rating of 1, indicating very poor access to public transport infrastructure<sup>10</sup>.
- 3.57 Around 20% of the Site is within 400m from Hadley Wood Train Station, with the remainder up to 200m further away. Great Northern Trains provide two trains every hour going to Moorgate and Welwyn Garden City. There is no east-west train service to Enfield or Barnet town centres, or to Cockfosters.
- 3.58 The nearest Underground station is High Barnet Tube Station which is approximately a 3.2km walk away. This is on the Northern line and provides access into central London. Cockfosters tube station is the nearest tube station in the borough, and this is situated 3.5km away and provides service to Central London and Heathrow via the Piccadilly Line.
- 3.59 There are bus stops for the 399 bus located on Camlet and Crescent West. The bus only runs once an hour between 10am and 2pm, Monday to Saturday, to its end stop at the small Barnet Spires shopping centre in Chipping Barnet. Half of the Spires' stores are vacant and its owner has gone into liquidation.
- 3.60 There is a single file footpath that connects the Hadley Wood to Monken Hadley, with no footpath on the western half of Waggon Road, to the north of the Site. There are no designated cycle paths in Hadley Wood.
- 3.61 A Walkability Index study has been undertaken for the Hadley Wood Neighbourhood Planning Forum by Space Syntax. It finds that Hadley Wood has an average walkability score of 7.8, which is below the average for Enfield (24) and significantly below the average for London

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<sup>10</sup> TfL - <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

(60). The factors contributing to the low walkability score in Hadley Wood are identified as being:

- A street network made up of disconnected streets,
- Large urban blocks that increase distances to walk; and
- A narrow mix of land uses creates few reasons to walk locally.

### **Summary**

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3.62 The audit provides an overview of social and community infrastructure near the site. **Table 3.8** provides a summary of the findings.

**Table 3.8 Summary of Baseline Audit**

<b>Service / Infrastructure</b>	<b>Sufficient provision</b>	<b>Explanation</b>
Early Years Education		Within a walkable distance, there are two early year facilities, which currently show capacity for 10 more places. However, the proposed development is anticipated to add a further 61 early years children hence there will be a deficit of 51 early years places.
Primary Education		There is one primary school within a walkable distance from the allocated site. Current capacity levels show that the school has been operating at 99% capacity level. However, more recent data indicates there is a long waiting list for Hadley Wood Primary School. The strategic site is estimated to increase the primary school need in the area by a further 48 children, hence requiring travelling outside a walkable distance to attend primary school.
Secondary Education		There are no secondary schools within a walkable radius. The closest secondary school is operating at 98% capacity, therefore the addition of a further 37 secondary school-aged children would put the schools at increased overcapacity. Any secondary school-aged children at the allocated Site would be required to travel even further to school, increasing car reliance.
Further Education		There are no walkable further education facilities. There is one college that provides post-16 education located 2.1km away.
Healthcare facilities		There are no NHS GP practices or dental facilities within a walkable distance from the allocated Site.
Community facilities		There is a variety of places of worship in Hadley Wood and there is a community hub provided through the Hadley Wood Association. However, there are no libraries or emergency services provided in the vicinity of the allocated site.
Open space and sports		There are five areas of open space that are accessible from the allocated site. There is a playground for young children. Equally, aside from an outdoor tennis club in the area, there is minimal sports provision, unless a car journey is taken to a sports facility.
Retail		There is a small cluster of shops (local parade) around Crescent Parade, proving a small convenience store, a hair salon, a café, and an estate agent. Overall, there is limited provision to support the current and estimated 460 additional residents of Hadley Wood.
Transport		The PTAL rating of 1 indicates very poor transport provision. Within a walkable distance, there is Hadley Wood Train Station and a bus stop (providing one very limited bus route). There is poor pedestrian and cycling infrastructure in Hadley Wood.

## 4. INTEGRATED IMPACT ASSESSMENT

- 4.1 Enfield Council has published an Integrated Impact Assessment<sup>11</sup> (IIA) which incorporates a Sustainability Appraisal, Strategic Environmental Assessment, Health Impact Assessment, Equalities Impact Assessment, Community Safety Impact Assessment and Habitats Regulations Assessment of the Enfield Regulation 19 draft Local Plan.
- 4.2 It includes a framework of 18 objectives which the Strategic Allocation Site has been profiled against, based on the 11.05 hectare Site providing 160 dwellings. Against each of the objectives, a colour coding effects symbol has been given as shown in **Figure 9**.
- 4.3 As some of the ratings appear too generous we have added our 'Audit Score' next to the IIA's ratings.

**Figure 9 Integrated Impact Assessment Scores**

IIA Objective		IIA Score	Audit Score
1	Climate change mitigation	N/A	--
2	Climate change adaptation	N/A	-
3	Housing	++	+
4a	GP surgeries	-	--
4b	Access to recreation	++	+
4c	Loss of recreation	--	--
4	Health & wellbeing	-	-
5	Services & facilities	+	--
6	Social inclusion	0	0
7	Crime & community safety	N/A	N/A
8	Road safety	N/A	-
9a	Access to employment	-	-
9b	Safeguarding employment land	0	0
9c	Employment provision	N/A	-
9	Economy	-	-
10	Town & local centres	+	+
11a	NO2 pollution	-	-
11b	PM10 pollution	0	-

<sup>11</sup> Enfield Council (2021) Enfield Local Plan Integrated Impact Assessment

11c	PM2.5 pollution	-	-
11	Air pollution	-	--
12a	Sustainable transport	--	--
12b	Services & facilities	++	-
12	Sustainable transport	0	--
13a	Biodiversity & geodiversity assets	0	--
13b	Designated wildlife sites, priority habitats	--	--
13	Biodiversity	--	--
14a	Proximity to historic assets – in settlements	N/A	--
14b	Proximity to historic assets – outside settlements	--	--
14	Historic environment	--?	--
15a	Landscape & townscape	--	--
15b	Open space	--	--
15	Landscape & townscape	--	--
16a	Brown/greenfield land	--	--
16b	Agricultural Land	-	-
16	Efficient use of land	--	--
17a	Flood zones	0	-
17b	Surface water flood risk	--	--
17	Flooding	--	--
18	Water	--	--

Source: *Enfield Integrated Impact Assessment, 2023*

4.4 Overall, the IIA lists only one objective with a significant positive effect. in the delivery of housing. There are materially more negative effects, ranging from climate change to sustainable transport and historic assets.

4.5 The Sustainability Audit does not score any objective as a significant positive, with seven objectives scored lower than the IIA.

## **Review of RUR.02 against the Integrated Impact Assessment Objectives**

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### **IIA1: Climate Change Mitigation**

4.6 The IIA has scored the allocated site 'N/A' in relation to ensuring that Borough's minimises the CO2 emissions per capita and intends to become carbon neutral by 2040. Based on the baseline analysis, it would not be possible for the strategic allocation to contribute to achieving this goal.

4.7 The baseline analysis showed that within a walkable distance (800m) from the allocated site there is a deficit of amenities and services. Coupled with this, the area has poor public transport infrastructure, as shown through the PTAL rating of 1. Overall, this means that the allocated Site would increase the number of trips taken by car. In doing so, it would contribute to climate change and adversely affect the Borough's goal of becoming carbon neutral. Therefore, the outcome of the allocation would have a significant negative effect on achieving object 1 of the IIA.

### **IIA2: Climate Change Adaptation**

4.8 A negligible effect has been assigned in the IIA to ensuring that climate change adaptation is considered. This objective has a particular emphasis on the likelihood of higher temperatures and worsening flood risk.

4.9 On the one hand, the outcome of this objective is related to the design of the strategic allocation, however, on the other, the site is currently greenfield land and has been for centuries, with parts of the site are at risk of flooding. Therefore, the removal of open grassland will adversely impact the flood risk in the area and there will be a minor negative effect to the adaptation to climate change.

### **IIA3: Housing**

4.10 The IIA awards housing as a significant improvement to the area. The delivery of 160 homes will have a positive impact on achieving Enfield's housing target, although it remains to be seen how many affordable homes will be provided. The Audit score is only moderately positive as the proposed housing does not address the local need identified in the 2023 Neighbourhood Plan.

### **IIA4: Health and Wellbeing**

4.11 The allocated site has been given a mixed effect significance, with some positive and some minor negatives for the health and wellbeing objective. The analysis shows that within an accessible walking distance there are several areas of open space that help with both mental and physical health.

4.12 There are no NHS GP or dental practices, or hospitals, in Hadley Wood. Therefore, to access healthcare, residents are required to travel to neighbouring areas.

4.13 In the area of the allocated site there are very limited sports facilities, with Hadley Wood having a 7 outdoor court tennis club and a private members golf course. Recreational facilities

such as gyms and swimming pools are located out of Hadley Wood. There is a sports pitch which is used by a football academy and Mount House private school.

- 4.14 On balance, the mixed effect of some minor positive and negative health and wellbeing effects appears justifiable for the allocated Site.

#### **IIA5: Services and facilities**

- 4.15 A minor positive effect has been assigned in the IIA to the services and facilities at the allocated Site.
- 4.16 The IMD establishes that the neighbourhood of the allocated site is in the lowest rank (1<sup>st</sup> rank out of 10) of deprivation for the barriers to housing and services in England.
- 4.17 The baseline analysis has confirmed that there is both a limited supply and high demand for amenities that are accessible to the allocated Site. Coupled with this, the allocated Site would increase the residential population in the area by approximately 460 people, increasing the pressure on schools, healthcare facilities, amenities, and recreational facilities.
- 4.18 Based on the above, it is justifiable to change the level of effect the IIA provided for the Site from minor positive effect to significant negative effect.

#### **IIA6: Social Inclusion**

- 4.19 The allocated site has been assessed to have a negligible effect on social inclusion. This objective aims to reduce poverty and social exclusion, along with developing social cohesion through good urban design, using the health streets indicators and community spaces as a catalyst for community cohesion.
- 4.20 Overall, the analysis would agree that a negligible effect on social inclusion would be anticipated. This is because, while there is an established community group in the Hadley Wood Association, which has a community facility that provides a pre-school (provider's contract terminated effective summer 2024, with no new provider appointed as yet) and bridge clubs, the healthy streets' aim of reducing traffic would not be achieved at the allocated Site.

#### **IIA7: Crime and Community Safety**

- 4.21 Both the baseline analysis of the sustainability audit and the Enfield IIA agree that there will be a negligible effect on crime and community safety through the allocation of the strategic Site.

### **IIA8: Road Safety**

- 4.22 The baseline analysis showed that there is a pedestrian single-file walkway from Hadley Wood to neighbouring area Monken Hadley, but no walkway on the western part of Wagon Road, to the north of the Site. Also, there are no cycle paths in the surrounding area. There is one bus route that runs from Hadley Wood to the nearby Barnet Spires shopping centre (once an hour between 10am and 2pm Monday to Saturday) and a train station that provides twice-hourly train service to Moorgate and Welwyn Garden City. The A111 Cockfosters Road is already operating at over 100% capacity at peak times and increased traffic on this road from housing development being proposed in the Local Plan will lead to more traffic and accidents.
- 4.23 Therefore, when marked against the 10 indicators of the Health Street Approach, the allocated Site scores poorly on the two main indicators, 'pedestrians from all walks of life' and 'people who choose to walk, cycle and use public transport'.
- 4.24 The allocated Site will increase the number of cars on the road and therefore adversely impact road safety. For this reason, a minor negative effect should be expected. This is worse than the IIA, which concluded a negligible effect.

### **IIA9: Economy**

- 4.25 The strategic allocation is not providing any employment space; therefore it is agreed with the IIA that a minor negative effect will result from the allocated Site.

### **IIA10: Town and Local Centres**

- 4.26 Enfield's assessment of the allocated site on the town and local centres anticipates a minor positive effect from the allocated site. This is based on the enhancement of vitality and vibrancy of the town and local centre.
- 4.27 The baseline analysis showed that there is a very limited provision of commercial and community services within Hadley Wood. It can be anticipated that the positive effects of increased footfall from the allocated Site would be felt in Barnet, where there is a wider retail offering.



### **IIA11: Air Pollution**

- 4.28 As declared in the LB of Enfield Air Quality Action Plan<sup>12</sup> the entire Borough of Enfield is within an air quality management area. The IIA assigned a minor negative effect to the level of air pollution arising from the allocated Site.
- 4.29 The baseline analysis shows an increase in the number of car journeys that would be required, because of the poor transport links and limited services provision in Hadley Wood. As a result there will be an increase in air pollution caused by vehicles. Equally, the pedestrian infrastructure in the area is limited, which adds to the adverse effects on the health of residents in the area. A significant negative impact is therefore considered a more appropriate score.

### **IIA12: Sustainable Transport**

- 4.30 A mixed significant positive and significant negative effect has been assigned in the IAA to the sustainable transport at the allocated Site. Contained within this objective is the desire for the Site to provide safe and easy access to public transport and services, promote the use of electric cars and sustainable modes of transport and promote compact, mixed-use development, which encourages walking and cycling for short journeys. Above all else, the objective seeks to support a modal shift away from the private car.
- 4.31 The PTAL rating of 1 (the lowest outcome) for the location of the strategic allocation shows that there is very poor access to public transport infrastructure in the area. This is confirmed through the area having one very limited bus route and a train station that provides a twice-hourly train service. Equally, there is no cycle infrastructure in place in the area and a single file footpath linking Hadley to Chipping Barnet, with no footpath on Wagon Road, northwest of the Site.
- 4.32 The baseline analysis has shown that the area is dependent on the use of private cars. Therefore, the allocated site is unable to support the objective of sustainable transport, increasing the effect to be significantly negative.

### **IIA13: Biodiversity**

- 4.33 The greenfield Site is anticipated in the IIA to have a significant negative effect on biodiversity. Even though the design of the scheme would have to implement biodiversity net gain enhancements, the allocated site is currently undeveloped grassland and consequently

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<sup>12</sup> LB of Enfield Air Quality Action Plan (2001)

allocation will harm biodiversity. This goes against the objective aim of delivering biodiversity net gain at an ambitious scale and avoid/mitigate impacts to value habitats and ecological networks.

#### **IIA14: Historical Environment**

- 4.34 A questionable significant negative effect is predicted to the historical environment if the allocated site is developed. This has been assigned based on the objective's aim of supporting the heritage assets in the Borough that are both designated and non-designated. There will be an impact on the setting of the listed buildings backing onto the site and development will impact the setting of both Hadley Wood and Monken Hadley Conservation Areas. Furthermore, the Site itself is part of an Archaeological Priority Area.
- 4.35 With the removal of greenbelt land to make for the strategic allocation, significant negative effects would occur to the historical environment due to proximity to heritage assets.

#### **IIA15: Landscape and Townscape**

- 4.36 The landscape and townscape surrounding the allocated site are predicted to experience a significant negative effect from the proposed development. Based on the objective of protecting and enhancing the landscape and townscape through the appropriate location, layout and design, including the preservation of important open gaps and key views, the analysis from the sustainability audit would agree that a significant negative effect would be the outcome.

#### **IIA16: Efficient use of Land and Materials**

- 4.37 A significant negative effect is likely to occur to the efficiency of land and material use if the allocated Site is developed. This is because the allocated site is not a brownfield site, therefore, allocation will contribute to the loss of undeveloped open space.

#### **IIA17: Flooding**

- 4.38 The effects of flooding in the IIA have been assigned a significant negative effect as a result of the allocated Site. The Enfield Policy's map has shown the northern boundary of the allocated site to be in Flood Zone 3. This means that there is a 1 in 100 or greater annual probability of river flooding (Monken Mead Brook is designated as a Main River).
- 4.39 The effects of flooding will also be exacerbated by the site's removal of grassland, which reduces the natural drainage and increases the risk of surface water flooding due to increased run-off. In light of this, a significant negative effect of flooding can indeed be anticipated.

**IIA18: Water**

- 4.40 The IIA expects a significant negative effect if the allocated Site was to be developed. Although minimising water use is driven by the design of the site, deterioration of groundwater and surface water is anticipated as the site is removed from greenfield open space, and drainage is already inadequate in the area.

## 5. SUMMARY AND CONCLUSIONS

- 5.1 The purpose of this Sustainability Audit is to consider if the 'Enfield Regulation 19 draft Local Plan' consultation document, which includes the proposed residential allocation of **RUR.02: Land Between Camlet Way and Crescent West** for the development of 160 residential units would be considered sustainable development. Policy DE6 Tall Buildings and Policy H4 Small Sites and Smaller Housing Development also rely on the fact that Tall Buildings and intensification of sites can only occur around high PTAL areas or within 800m of a tube or railway station. The reason behind this was that these locations are assumed to be sustainable.
- 5.2 This audit has established the existing level of provision of community infrastructure (education facilities, healthcare provision, community facilities, sport and recreational facilities and open space and retail) in the locality.
- 5.3 This assessment is intended to respond to the NPPF requirement for achieving sustainable development, as well as the Draft Enfield Local Plan, which echoes the NPPF in **Policy SS1** through supporting developments that provide sustainable growth with supporting infrastructure. These policies ensure that new residential developments will be supported by essential infrastructure needs.
- 5.4 Using the GLA population yield calculator, it is possible to estimate that the 160 residential units the allocated site is proposing will increase the population by 460 people.
- 5.5 The audit demonstrates that the current and proposed community facilities that are within a walkable distance from the allocated site are very limited. This is reflected in the IMD score for the domain of barriers to housing and services that ranks the area where the allocated site is in the 1st rank of deprivation out of 10.
- 5.6 Within an 800m radius, there are two pre-schools (the future of one is uncertain beyond Summer 2024 as the provider's contract has been terminated) and one primary school but no secondary schools. However, all educational facilities are operating at or near capacity levels. The increased residential population of the allocated site would put schools over capacity levels, and in doing so increasing car trips as residents are required to travel further to access schools.
- 5.7 There is no healthcare infrastructure within a walkable distance of the allocated site.

- 5.8 The open and recreational space in the area is limited. There are several large areas of open space within a walkable distance. Equally, the area provides a tennis club but no gyms or swimming pools.
- 5.9 The allocated site has a PTAL rating score of 1, which reflects that there is very poor access to public transport infrastructure. This is also confirmed in the Walkability Index Study that was undertaken in Hadley Wood showing that the average walkability rating was 7.8, materially below the Enfield (24) and London average (60). Due to the poor public transport connections, as well as cycle and pedestrian infrastructure, there will inevitably be an increase in private car trips to reach community infrastructure.
- 5.10 The Enfield Integrated Impact Assessment assessed the strategic allocation against the objectives for the Borough. Overall, the assessment saw a positive benefit to the effect on housing and significant negative effects on water, efficient use of land and materials, biodiversity and landscape and townscape.
- 5.11 Based on the baseline analysis, this sustainability audit justified that sustainable transport, road safety, air pollution, services and facilities, biodiversity, climate change adoption and climate change mitigation should all be downgraded from the outcome given in the IIA.
- 5.12 This is mainly justified through the area's poor community infrastructure in the area, coupled with poor transport infrastructure, which would lead to an increase in the number of private care journeys that would need to occur if the strategic allocation went forward. This goes against the Enfield policy requirement of supporting a modal shift away from private car use. Equally, the Site is currently greenfield land and therefore any development will adversely impact the environmental benefits of the area.
- 5.13 The sustainability audit has confirmed the IMD rating of high level of deprivation of barriers to housing and services. It has shown that there is a lack of essential community infrastructure and sustainable transport links in the area. This goes against policy requirements for the delivery of homes in a sustainable location and reducing the need for car usage.
- 5.14 Overall, the proposed residential allocation of **RUR.02: Land Between Camlet Way and Crescent West** for the development of 160 residential units would not be considered a sustainable location for development and the allocation should be removed from the Local Plan. For the same reason, Hadley Wood is not deemed to be a suitable location for Tall Buildings and should be removed from DM DE6. Policy DM H4 Small Sites and Housing

Development requires sites to be highly sustainable and, even though Hadley wood has a railway station, this alone is not sufficient to make the area sustainable and therefore the policy should be amended so it is only applicable to proven sustainable locations.