

# Appendix 1



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**Robert Wilson**

Hadley Wood Association

Hadley Wood Neighbourhood Planning Forum

10 September 2021

Our ref.: THP781

By Email only: [robert.wilson.consult@gmail.com](mailto:robert.wilson.consult@gmail.com)

Dear Robert,

**Draft Enfield Local Plan: Representations**

Thank you for asking Troy Planning + Design to prepare representations to the Enfield Local Plan on behalf of the Hadley Wood Association and the Hadley Wood Neighbourhood Planning Forum, and which forms a continuation of our work with you, having worked closely with the Forum over the past few years on production of the draft Neighbourhood Plan. The representations to the draft Regulation 18 version Enfield are now enclosed for submission to the Borough alongside your material.

The representations focus upon the proposed allocation of land at Camlet Way and Crescent Way in Hadley Wood (Site Allocation SA45), involving release of the site from the Green Belt. The representations consider the allocation against the purposes of the Green Belt as well as wider matters, including landscape impact, housing supply matters and, more generally, traffic considerations. Key points arising from the review of material are that:

- The rationale for release of the site from the Green Belt is not justified nor suitably evidenced. Indeed, Enfield Council's own studies indicate that the site contributes strongly to the purposes of the Green Belt and any development of the site would be considered to be harmful to the Green Belt.
- Release of the site is not justified in terms of housing supply. Enfield Council has not clearly established the future housing requirement for the Borough and until this is established it is inappropriate to consider Green Belt releases. Furthermore, Enfield Council has not fully considered and assessed all opportunities for development and intensification within existing built-up areas. Again, until this is undertaken, Green Belt releases cannot be justified. Additionally, there is little evidence to support the suitability or deliverability of the site, with the site information in the Enfield Council SHLAA being limited.

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- The rationale for identifying land at Camlet Way and Crescent Way as an opportunity for growth is based upon proximity to Hadley Wood railway station. However, proximity alone is not sufficient to justify growth and development. Existing public transport services are poor and with no improvements to services in the pipeline the 'sustainability' of the site as a location for development must be questioned. Development of this site as well as other Green Belt releases proposed in the Regulation 18 Local Plan, are likely to increase the volume of traffic and congestion in the borough, including that along Cockfosters Road, which already suffers congestion and where there are existing safety concerns, none of which the Local Plan appears to be addressing.
- The impact of development on the site on the adjacent conservation areas, in both Hadley Wood and Monken Hadley, as not been sufficiently considered. Indeed, the Green Belt assessment is restricted to land within the borough boundary, even though the conservation area at Monken Hadley immediately adjoins the conservation area and is important to the setting of the area. Furthermore, it does not appear that there have been any cross-boundary discussion or considerations when reviewing the Green Belt. The Hertsmere Green Belt review for example recognises the strong contribution that the site makes to the Green Belt and that it should not be released.
- The site is within an Area of Special Character, identified as recently as 2013, for its unique and historic landscape. There have been no changes since 2013 to suggest that these qualities have changed. Release of this site would conflict with and cause harm to its special qualities.

In summary, the representations support your view that the proposal to allocate the site is flawed, that it is neither evidenced nor justified, and that it should be removed from the draft Local Plan before the Regulation 19 version is published.

Yours sincerely,  
for Troy Planning + Design



**Jon Herbert**  
Director



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# Green Belt

## *Executive Summary*

<b>KEY POINTS RAISED</b>	
1.	Green Belt parcel EN3 attained ‘strong’ contribution scorings for four of the five NPPF Green Belt purposes and is therefore unsuitable for development
2.	Green Belt parcel EN3 also attained a ‘very high’ harm rating, as stated within the Executive Summary of the Green Belt and Metropolitan Open Land Study (2020), thus meaning that development on this parcel would lead to an unnecessary level of harm to the landscape.
3.	Green Belt parcel EN3 lies adjacent to the Hadley Wood Conservation Area and the parcel plays an important role in establishing the historic setting of the conservation area. With this in mind, the development of this site would lead to irrecoverable harm to local heritage. It should also be noted that the consultants commissioned to prepare the Enfield Green Belt study (LUC) were also commissioned to produce a Green Belt study for the neighbouring authority of the LB Barnet, and yet they have failed to take into account the wider context and neighbouring Green Belt significance when assessing parcels which are adjacent to administrative boundaries. This is important given the findings of their Green Belt study for LB Barnet, which notes the importance of the Green Belt in this location.
4.	The Monken Hadley Conservation Area in adjacent borough LB Barnet was not considered within the LB Enfield Green Belt and Metropolitan Open Land Study (2021). This is a flawed approach, as the removal of parcel EN3 would cause adverse effects to the character and intrinsic value of the Monkey Hadley Conservation Area. It should also be noted that the Monken Hadley Conservation Area includes a number of Grade II listed assets and any development would impact upon the setting of these and the Conservation Area.
5.	LB Enfield Council has not sufficiently demonstrated that exceptional circumstances have been met to warrant removal of the Green Belt, as, contrary to paragraph 141 clause (c) of the NPPF, no Statement of Common Ground (SoCG) between LB Enfield and neighbouring authorities has been submitted within the evidence base. Therefore, it cannot be considered that the Regulation 18 Local Plan has demonstrated that it has made “effective use of land” (as per paragraph 119 of the NPPF), as it is clear that other potential sources of supply have not been adequately assessed by LB Enfield Council. Furthermore, paragraph 121 of the NPPF makes it clear that Local Planning Authorities should take a “proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership”. There is no evidence to suggest this has been undertaken.
6.	LB Enfield Council has made presumptions regarding the sources of housing supply i.e., that Green Belt will need to be de-designated in order to

	accommodate housing need. As this is a Regulation 18 Local Plan, LB Enfield Council should be proactively assessing all alternative sources of supply.
7.	Each Green Belt parcel put forward should be assessed on a site-by-site basis. Therefore, sites such as EN3 which contribute more highly to the NPPF's Green Belt purposes should be assessed and weighed up against those which contribute comparatively weaker in Green Belt terms. It should be noted that LB Enfield Council extended the Green Belt designation of parcel EN3 to ensure it was included within the Hadley Wood Conservation Area during the previous Green Belt Review in 2013. There has been no change in the intervening period to suggest that circumstances have changed and thus the boundary should be altered again.
8.	Land to the west of parcel EN3 is considered to contribute strongly to Green Belt purposes within the LB Barnet's Green Belt and Metropolitan Open Land Study – Stage 1 Final Report (2018), therefore the removal of the parcel would cause adverse impacts to the landscape and contribution of the neighbouring Green Belt parcel. It should also be noted that the Study did not recommend that land to the west of parcel EN3 be taken forward for further consideration.
9.	The Stage One Green Belt Assessment (2016) <sup>1</sup> for Hertsmere applied a wider-than-district approach and considered parcel EN3 to contribute strongly to all NPPF Green Belt purposes. This Assessment recommended that parcel EN3 (and land to the west) should not be considered further.
10.	Development of this meadow in the Green Belt would be an incursion into a green area that has a greater visual impact and urbanising feel to the remainder of the Green Belt and affects the character of this pleasant historic settlement.

### ***Policy Context***

- 1.1. The National Planning Policy Framework (NPPF) attaches great importance and significant weight to Green Belts. Paragraph 138 of the NPPF states the following:
- “The Green Belt serves five purposes:*
- a) to check the unrestricted sprawl of large built-up areas;*
  - b) to prevent neighbouring towns merging into one another;*
  - c) to assist in safeguarding the countryside from encroachment;*
  - d) to preserve the setting and special character of historic towns; and*
  - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*
- 1.2. Importantly, paragraph 140 of the NPPF stipulates that *“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and*

<sup>1</sup> <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/New-LP-GB-Assessment-Report2016.pdf>

*justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”.*

- 1.3. The recently adopted London Plan (2021) aligns with protectionist stance of the NPPF. Policy G2 (London’s Green Belt) of the London Plan states that:

*“The Green Belt should be protected from inappropriate development:*

*1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist,*

*2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.*

*Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan”.*

### ***LB Enfield Regulation 18 Local Plan Site Allocation SA 45 (Land between Camlet Way and Crescent West, Hadley)***

#### Contribution to Green Belt purposes

- 1.4. The Regulation 18 Enfield Local Plan proposes to allocate one site adjacent to the built-up edge of Hadley Wood for residential development. As detailed in Strategic Policy SP H1 (Housing Development Sites), site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) is allocated for 160 residential units. This site is currently designated as Green Belt, as highlighted in the Regulation 18 Enfield Local Plan Policies Map extract below. It should also be noted that this site adjoins Green Belt land to the west in the neighbouring local authorities of LB Barnet and Hertsmere.

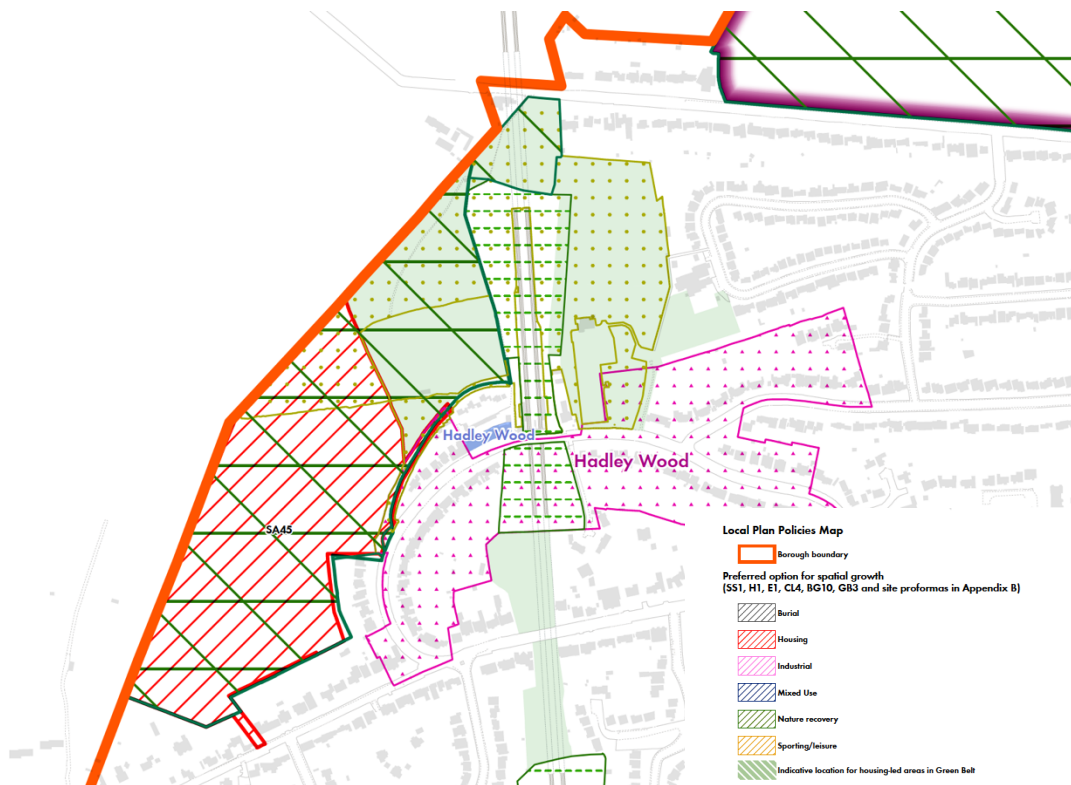


Figure 1: Enfield Draft Local Plan Policies Map highlighting policies relevant to Hadley Wood

- 1.5. In response to national and regional policy, LB Enfield has published a Green Belt and Metropolitan Open Land Study (published in June 2021 by LUC on behalf of LB Enfield) as a Local Plan evidence document. The purpose of this document is to assess Green Belt parcels within the borough against the NPPF’s five purposes (as above) and to identify the level of harm to each associated Green Belt parcel if the land was to be de-designated as Green Belt.



- 1.6. The Green Belt Study refers to the site allocation as EN3, as shown on the map below. Table 1 presents the contribution findings for parcel EN3.

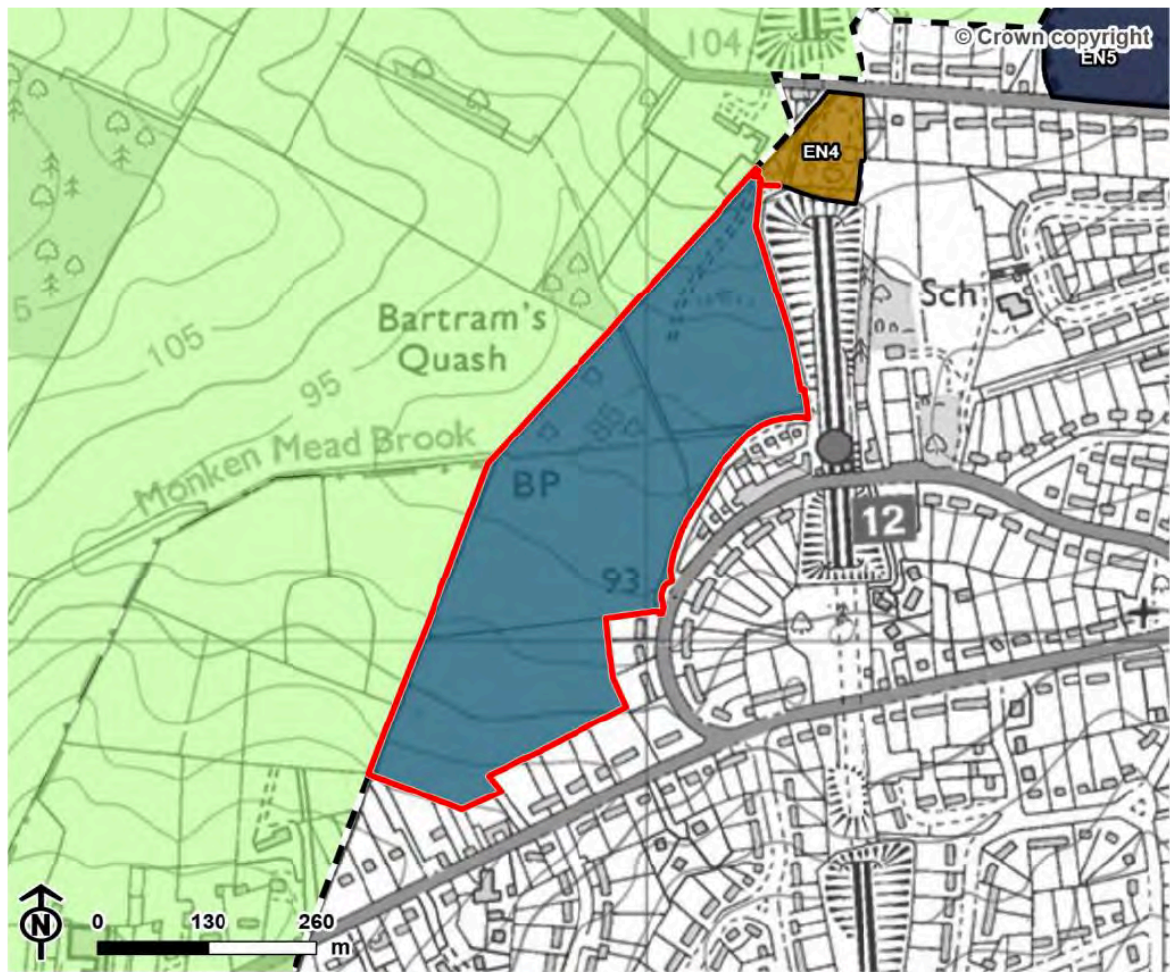


Figure 2: Green Belt parcel EN3 (highlighted in red) (source: Appendix 2 of the LB Enfield Green Belt and Metropolitan Open Land Study, 2021)

PURPOSE	CONTRIBUTION SCORE	ASSESSMENT PROFORMA EN3 PURPOSE SUMMARIES
Purpose 1: to check the unrestricted sprawl of large built-up areas	Strong (highest possible contribution score)	Land is adjacent to the large built-up area of Greater London. The Land is open, being formed of agricultural fields and there is strong distinction between the parcel and the urban area.
Purpose 2: to prevent neighbouring towns merging	Moderate	Land is peripheral to a gap between Greater London and Potters Bar to the north. It is open, formed of agricultural fields and there is strong distinction between the parcel and the urban

into one another		area.
Purpose 3: to assist in safeguarding the countryside from encroachment	Strong (highest possible contribution score)	Land is formed of open fields and so is countryside and there is strong distinction between the parcel and the urban area.
Purpose 4: to preserve the setting and special character of historic towns	Majority of parcel is strong (highest possible contribution score), small section of parcel weak/no	The land lies directly adjacent to the Hadley Wood Conservation Area which is contiguous with and therefore forms part of historic London. The Conservation Area Appraisal notes “attractive breaks occur in the street frontage on the north side of Crescent West, where houses give way to open country, with views out to the northwest of hills and woods”. The three southernmost open fields have views into or can be viewed from the conservation area. The northernmost field is screened by woodland from the conservation area and therefore is not considered to make a contribution to purpose 4.
Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Strong (highest possible contribution score)	All Green Belt land is considered to make an equally strong contribution to this purpose.

Table 1: Parcel contribution scores for Green Belt parcel EN3 (source: Appendix 2 of the LB Enfield Green Belt and Metropolitan Open Land Study, 2021)

- 1.7. Green Belt parcel EN3 (otherwise referenced as LP465 within the Green Belt and Metropolitan Open Land Study, 2020) attained ‘strong’ contribution scorings for four of the five NPPF Green Belt purposes and scored a ‘very high’ harm rating. The justification provided states that the *“site is isolated, adjacent to the inset urban area and has clear readily recognisable field boundaries”*.
- 1.8. Given that parcel EN3 received ‘strong’ contribution and a ‘very high’ harm rating, it is entirely unclear as to why Policy SA 45 (Land between Camlet Way and Crescent West, Hadley) has been allocated as a site for residential uses within the Regulation 18 Enfield Local Plan. A key feature of parcel EN3 is its strategic relationship with the wider Green Belt to the northwest. As noted in Table 1, parcel EN3 is considered

important due to the distinction it makes between the built-up edge of Greater London and wider Green Belt land.

- 1.9. The above conflicts with claims made by the site promoters within the 'Land at Camley Way, Hadley Wood' Further Supporting Information document (2016), who state that *"Duchy's land at Camlet Way could be sensitively developed to form a natural 'rounding off' of the settlement without undermining the wider purposes of the Green Belt"*. The promoters add that *"development of this relatively modest Green Belt site that has clear boundaries and would not result in urban sprawl will assist the Council in meeting its need for new housing without resulting in the need for a major review of the Green Belt at this location"*. This is not the case, as it is clear that the development of this parcel would, as contrary to paragraph 138c) of the NPPF, result in the encroachment of the countryside. Furthermore, the Hadley Wood Heritage and Character Assessment (2018) states that:

*"the Hadley Wood Conservation Area Character Appraisal included important views down the tree lined Lancaster Avenue, Crescent West and Crescent East and out over the rural landscape of Hornbeam Hills South Area of Special Character to the northwest from the junction of Crescent West and Bartrams Lane. This particular view is partially screened by scrub, ivy and trees."*

- 1.10. This statement provides further compelling evidence to highlight that the development of this site would lead to the encroachment of the countryside.



Figure 3: View northwest off Bartrams Lane (screenshot taken 50m north of Hadley Wood Station)

- 1.11. It is also acknowledged within the Green Belt and Metropolitan Open Land Study (2021) that parcel EN3 lies adjacent to the Hadley Wood Conservation Area and the

parcel plays an important role in establishing the historic setting of the conservation area, providing landscape views north of Crescent West. Therefore, parcel EN3 also plays a significant role in preserving the historic setting of the conservation area, as per paragraph 138d) of the NPPF. With this in mind, the promoter's statement cannot be deemed valid as, whilst the tree-lined western boundary will to some degree reduce the impact on the openness of the Green Belt, it is clear that the development of this site allocation would adversely impact the local historic setting and would significantly undermine the overall landscape value of the surrounding countryside.

'Exceptional circumstances' case

- 1.12. With the above in mind, it is evident that LB Enfield has failed in the first instance to protect Green Belt land, as per Chapter 13 of the NPPF. In reaching its conclusion, The Regulation 18 Local Plan justifies its approach to site allocations by stating that *"ELP's preferred approach is set out in policy SS1: Spatial strategy, which proposes the provision of 24,920 new homes within the Borough in strategic locations with some release of the Green Belt due to the exceptional circumstances identified in this Local Plan"*. This justification falls short of the expectations set out in paragraph 140 of the NPPF, as, due to the lack of referenced evidence, the above supporting text cannot in any way be considered *"fully evidenced and justified"*.
- 1.13. To justify 'exceptional circumstances', LB Enfield is required to adhere to paragraph 141 of the NPPF, which asserts that to adequately justify the de-designation of Green Belt, strategic policy-making authorities must evidence that *"it has examined fully all other reasonable options for meeting its identified need for development"*. This includes the following:
- "a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."*
- 1.14. Matters related to housing land supply are covered in the accompanying paper. In terms of Green Belt release, LB Enfield has not sufficiently demonstrated that exceptional circumstances have been met, as, contrary to paragraph 141 clause (c) of the NPPF, no Statement of Common Ground (SoCG) has been submitted within the evidence base. It is evident that LB Enfield Council has not engaged with

neighbouring authorities to ensure that “*cross-boundary strategic matters have been dealt with rather than deferred*”. As such, the Regulation 18 Local Plan does not comply with paragraph 35c) of the NPPF. On this basis, the Regulation 18 Local Plan’s proposal to release Green Belt for residential purposes is not valid and cannot be justified as an ‘exceptional circumstance’. Matters relating clauses a) and b) of paragraph 138 of the NPPF are covered in further detail within our note on housing supply matters.

- 1.15. Furthermore, it is considered that local housing need alone is not a valid justification for the removal of land from the Green Belt. Chapter 2.2 of the Regulation 18 Local Plan explicitly states that a key spatial issue within the borough is as follows:

*“How to strike the right balance between meeting development needs through intensification within urban areas and allowing the limited release of Green Belt land?”.*

- 1.16. Given that the current plan preparation stage of the Enfield Local Plan is Regulation 18, this should (our emphasis added) be flexible and should present ideas on how development needs can be met throughout the Plan period. This is enshrined within Regulation 18 of The Town and Country Planning Act (Local Planning) (England) Regulations 2012<sup>2</sup>, which states that “*a local planning authority must a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain*” (our emphasis added). Keeping in mind the earlier point at paragraph 1.12 regarding key spatial issues, the remark regarding the spatial distribution of proposed development (including the release of Green Belt) is considered to be purely presumptive and uncooperative. To rectify this issue, LB Enfield should in the first instance engage with neighbouring authorities to address the issue of unmet housing need, as per paragraph 35a) of the NPPF. If this need cannot be met, LB Enfield should apply a sequential approach that is based on proportionate evidence.

- 1.17. The requirement to make an effective use of land through application of sequential testing is set out in paragraph 120 of the NPPF. Paragraph 120 places significant weight on the usage of suitable brownfield land in addition to the development of under-utilised buildings. Paragraph 120 also supports opportunities to use the airspace above existing residential and commercial premises.

- 1.18. Once the above sources of supply have been exhausted, Green Belt may be considered for development. However, it is critical to note that each Green Belt parcel considered for development should be thoroughly appraised on a site-by-site basis. This notion was recently affirmed by the Inspector (Melvyn Middleton) of the Welwyn Hatfield Local Plan Examination, who, in a letter to Welwyn Hatfield

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<sup>2</sup> <https://www.legislation.gov.uk/uksi/2012/767/regulation/18/made>

Borough Council’s Planning Policy & Implementation Officer (dated June 2021)<sup>3</sup> stated that *“having arrived at that in general numerical terms, you will then need to comparatively assess the weight of evidence determining exceptional circumstances to remove land from the green belt on a site-by-site basis in the different locations. Those sites that cause least harm to the green belt’s openness and purposes whilst at the same time favouring those that score best from a sustainability perspective should be chosen.”*

- 1.19. Given that site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) scored ‘very high harm’ and was classified as “open” within the Green Belt and Metropolitan Open Land Study (2021), it is very evident that this parcel should not be allocated within the Regulation 18 Local Plan. To further evidence its unsuitability, Figure 4 below highlights that site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) is just one of six Green Belt sites which scored ‘very high harm’, with all other Green Belt sites assessed scoring comparatively lower in terms of harm.

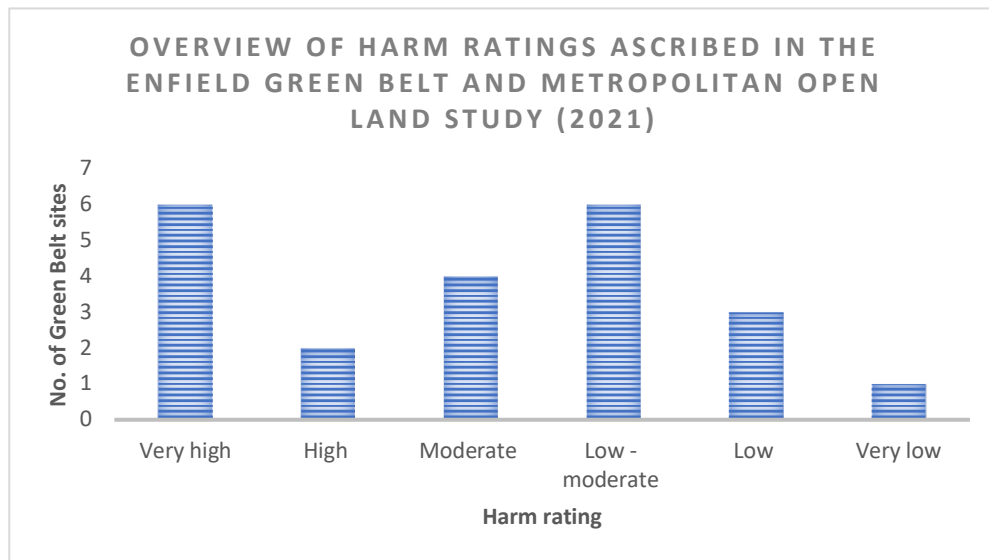


Figure 4: Overview of harm ratings ascribed in the Enfield Green belt and Metropolitan Open Land Study (2021)

- 1.20. With the above in mind, the decision to allocate SA 45 (Land between Camlet Way and Crescent West, Hadley) also conflicts with paragraph 142 of the NPPF, as the site has not been previously developed and is only moderately served by public transport (the entirety of Hadley Wood achieves a PTAL score of either 1a or 1b<sup>4</sup> – the lowest scoring possible in relation to public transport accessibility across London).

<sup>3</sup> [https://www.welhat.gov.uk/media/19167/EX271-Letter-to-WH-re-Stage-9-docs/pdf/EX271\\_Letter\\_to\\_WH\\_re\\_Stage\\_9\\_docs.pdf?m=637613767572330000](https://www.welhat.gov.uk/media/19167/EX271-Letter-to-WH-re-Stage-9-docs/pdf/EX271_Letter_to_WH_re_Stage_9_docs.pdf?m=637613767572330000)

<sup>4</sup> <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?Input=Hadley%20Wood%2C%20Barnet%2C%20UK&locationId=ChIJ2xrSJRgYdkgRCmlhnErCKbU&scenario=Base%20Year&type=Ptal>

### Wider consideration for Green Belt

- 1.21. The Green Belt and Metropolitan Open Land Study (2021) study is deemed to be flawed on the basis that it does not take account of Green Belt considerations outside the borough boundary. Given that the western site boundary of site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) lies adjacent to the boundary of LB Barnet, it is entirely inappropriate for the study to not assess adjacent planning constraints and landscape features in relation to Enfield's Green Belt parcels. For example, in the case of site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley), the EN3 Green Belt parcel lies adjacent to the Monken Hadley Conservation Area, which is also located within the Green Belt within the LB Barnet. This is particularly relevant, as the Monken Hadley Conservation Area Assessment highlights that the field boundaries bordering the site are long established, and therefore any development within the bounds of site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) would likely cause adverse harm to the character and landscape value of the Monken Hadley Conservation Area.
- 1.22. It is also important to note that the Green Belt Harm Assessment Proforma (Appendix B) of the Green Belt and Metropolitan Open Land Study (2021) fails to recognise the likely effects to Green Belt land beyond the "*consistent boundary to the west*" within LB Barnet, as evidenced by the below extract:
- "Release of the parcel would result in a minor impact on the distinction of adjacent Green Belt land due to the presence of the inset urban edge to south, east and northeast and the availability of a regular and consistent boundary to the west. However, small parcels of land immediately beyond the parcel to the east and north bound by trees and mature hedgerows would be much closer to the urban edge."*
- 1.23. The Green Belt land to the west (also designated as the Monken Hadley Conservation Area) scored 'strongly' against four of the five Green Belt purposes in the LB Barnet's Green Belt and Metropolitan Open Land Study – Stage 1 Final Report (2018)<sup>5</sup>. This is particularly concerning given that the LB Barnet Green Belt and Metropolitan Open Land Study – Stage 1 Final Report (2018) was undertaken by the same consultant (LUC) as the LB Enfield Study. This provides further evidence to suggest that the land to the west of SA 45 is a valued landscape which should be assessed in relation to its wider setting.
- 1.24. Hertsmere District Council also sits adjacent to site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley). Importantly, the Stage One Green Belt Assessment (2016)<sup>6</sup> for Hertsmere applied a wider-than-district approach, meaning that parcel 16 of this study incorporates site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley Wood), as shown in Figure 5. The Assessment concluded that, overall, parcel 16 contributes strongly to Green Belt purposes and

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<sup>5</sup> [https://www.barnet.gov.uk/sites/default/files/barnet\\_green\\_belt\\_and\\_metropolitan\\_open\\_land\\_study\\_part\\_1\\_2018.pdf](https://www.barnet.gov.uk/sites/default/files/barnet_green_belt_and_metropolitan_open_land_study_part_1_2018.pdf)

<sup>6</sup> <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/New-LP-GB-Assessment-Report2016.pdf>

summarised that *“there are no readily identifiable sub-areas for consideration and the parcel should not be considered further”*. This entirely contradicts LB Enfield’s Green Belt and Metropolitan Open Land Study (2021) and as such severely undermines the overall suitability of site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley Wood) for development purposes.

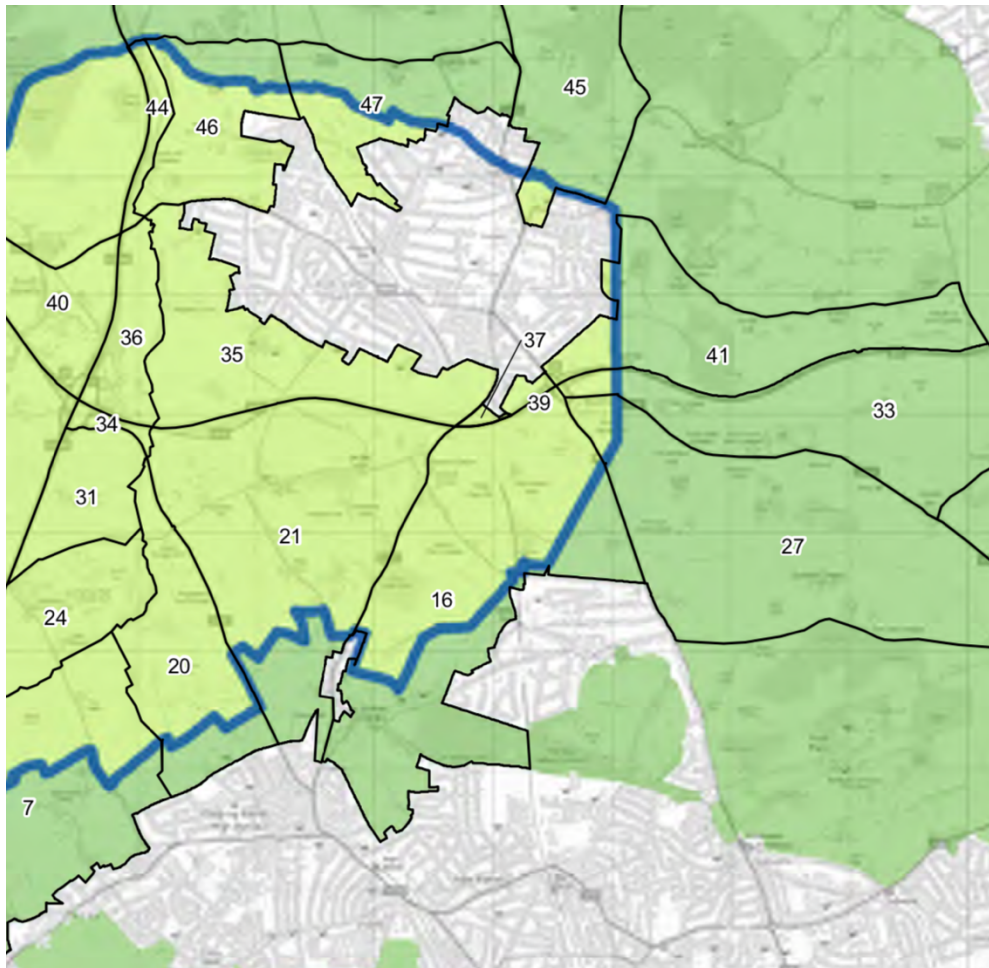


Figure 5: Parcel 16 of the Hertsmere Borough Council Stage One Green Belt Assessment (2016)

- 1.25. Therefore, it can be concluded that the failure to not assess beyond the borough boundary in the Enfield Green Belt and Metropolitan Open Land Study (2021) has resulted in inaccurate findings, as the surrounding landscapes are evidently sensitive to changes resulting from development. This methodological limitation conflicts with paragraph 16a) of the NPPF, as this evidence was not *“prepared with the objective of contributing to the achievement of sustainable development”*, as, as highlighted in paragraph 8c) of the NPPF, the environmental objective of *“contributing to protecting and enhancing our natural, built and historic environment”* has not been fulfilled.