

Draft Enfield Local Plan 2019-2041 Regulation 19 consultation

Representation by the Hadley Wood Neighbourhood Planning Forum



May 2024

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Executive Summary

This submission follows our extensive representation in the Regulation 18 Local Plan consultation and has been written with the help of legal counsel and other expert advisors, whose detailed reports are attached to this representation.

- i. As LB Enfield have not incorporated most of the issues that we, and many local residents, commented on, our concerns are largely **unchanged** from our 2021 Regulation 18 representation.
- ii. The primary focus of this paper is the objection to the proposed release from the **Green Belt** of 11ha of land in Hadley Wood for the development of 160+ new homes (Site RUR.02), but many of the issues equally apply to the other proposed Green Belt allocations. Our representation also details other issues that we think must be addressed, with the **proposed modifications** listed in Appendix A.
- iii. The new draft Local Plan's most notable change from the Regulation 18 version is a 34% increase in the **housing target**, introduced without prior consultation. The housing strategy is neither positively prepared nor justified because, for the period after 2029, the housing target is based on sites put forward for development by their owners (including those of high value Green Belt sites), i.e. **capacity-based**, without establishing the number of new homes that are actually needed and without planning the necessary infrastructure improvements.
- iv. The approach is contrary to **paragraph 4.1.11** of the London Plan, which expressly requires the involvement of the GLA; there is no evidence of the GLA being supportive of the Green Belt allocations. The approach furthermore does not meet the plan-making requirements and is especially flawed for sites that are currently in the Green Belt, which should only be allocated as a last resort.
- v. The Plan is not justified, as the **exceptional circumstances** for the release of large areas of Green Belt land have not been adequately evidenced. Developing over 9,400 new homes on current Green Belt land, in areas with poor public transport, will harm biodiversity, exacerbate traffic congestion and add to air pollution, while the absence of an appropriate sustainability appraisal for the Green Belt allocations renders the Local Plan unsound and legally non-compliant. The Council should not be using so-called 'viability constraints' of urban sites as justification for Green Belt release. Additionally, the Exceptional Circumstances Topic Paper makes only very limited reference to Site RUR.02.
- vi. Our strong objection to the release for development of **Site RUR.02** is based on:
 - a. The **exceptional circumstances** have not been evidenced.
 - b. The **Green Belt** and MOL Study¹ scores Site RUR.02 '**strong**' in four out of the 5 purposes of the Green Belt, and the Final Report² rates the **harm** that development would cause as '**very high**', noting the "*site is isolated*". This has been entirely ignored in the assessment.
 - c. The site should have been ranked in the lowest category of sites and dropped at an early stage, with the **Integrated Impact Assessment**'s ratings for site RUR.02 actually supporting its retention in the Green Belt.
 - d. The site is **not a sustainable development location**. There are very limited local amenities, it has very low PTAL public transport accessibility score of 1b and the area is highly car-dependent, with insufficient infrastructure and no planned improvements.
 - e. The **landscape** and **heritage** impacts have not been adequately considered. The site is an Archaeological Priority Area that lies between two Conservation Areas and adjacent to several Listed Buildings. The site is part of the Enfield Chase Area of Special Character, designated by Enfield Council following the recommendations of the Countryside Commission, English Nature, English Heritage and the London Ecology Unit, based on its combined landscape, historical and nature conservation interests.

- f. The centuries-old grassland is a carbon sink with significant **biodiversity** and **wildlife** benefits, and parts are a Site of Borough Importance for Nature Conservation and Flood Zone 3.
- g. The site would only deliver housing after **more than 10 years**, i.e. beyond the period for which reliable housing need numbers have been established.
- vii. None of the above impacts have been considered in the **Sustainability Appraisal**. If they had, the Council would have reached a different conclusion and would not have allocated the site and/or lowered the overall housing requirement that the Borough can meet.
- viii. The Local Plan is not justified, as the Council has failed to take a proactive role in identifying and helping to bring forward all suitable alternative and **brownfield** sites to their full capacity. Further, the capacity of **SIL** sites has not been fully assessed and the viability and densification assumptions for redevelopment of the urban area are not robust.
- ix. The Plan lists and describes specific locations in the borough, ensuring policies can be applied in those areas in a way that takes into account their particular character and circumstances, and it advocates creating **placemaking strategies** for areas of major change. Hadley Wood is noticeable by its absence from both of these building blocks.
- x. The Plan is not consistent with national policies and legislation, as the Council failed to take into account the **1,000 Regulation 18 representations** submitted by local residents and the Hadley Wood Neighbourhood Planning Forum's extensive submission, supported by detailed expert reports. The Council rejected the Forum's request for the Consultation Statement - which fails to reflect the scale of opposition to allocation of the Hadley Wood Green Belt land and does not mention the Forum's extensive submission in the section on site RUR.02 - to be updated.
- xi. We have already been copied on over **2,000 Regulation 19 representations** by residents, which compares with approximately 1,000 households in Hadley Wood, objecting especially to the proposed allocation of Site RUR.02. The doubling of the representations compared with the Regulation 18 consultation reflects the community's feeling that the Council has ignored their views. We note that most residents used the simplified online form that we set up, as the Council's Word form was excessively cumbersome – our (attached) form with proposed modifications comprises a staggering 64 pages, compared with only 4 pages in Appendix A of this paper...
- xii. The Local Plan and its policies are based on **decisions made years ago**, before active engagement with communities and other planning bodies, and before relevant evidence was gathered. The Evidence Base contains a mass of over 16,000 pages across disjointed reports that were drafted to fit those decisions and policies, or whose assessments and conclusions were dismissed.
- xiii. There has been no consultation with the Hadley Wood Neighbourhood Planning Forum, despite Hadley Wood having the only adopted Neighbourhood Plan in the borough. The Local Plan and supporting documents make only minor references to the **Hadley Wood Neighbourhood Plan**, and have failed to take the NP's policies and aspirations into account; we note that Aspiration HW (iii) states that *"This Neighbourhood Plan proposes that Green Belt boundaries within and surrounding Hadley Wood remain unchanged"*.
- xiv. Based on the above we consider the Plan as drafted **neither sound nor legally compliant**. However, we believe it can be made sound and legally compliant with the **modifications** listed in **Appendix A**.

Detailed Representation

- **Process has been flawed from beginning to end, with predetermined outcomes.**
- **Housing target increased by 34% without consultation.**
- **Evidence Base has been written to fit the chosen policies, not to produce them.**

1. London Borough of Enfield (**LBE**) released its pre-draft Local Plan 2019-2041 (**ELP**)¹ on 6th December 2023, with the intention of a full Council meeting on 6th March 2024 approving the ELP for Regulation 19 Public Consultation. The Hadley Wood Neighbourhood Planning Forum (**HWNPF**), via its legal representation, wrote to the Council to request a delay to the vote as neither the Councillors nor the public had seen the key Topic Papers that evidence the ELP. The Council agreed to postpone the meeting and during the following two weeks released dozens of documents, including the:
 - Green Belt Exceptional Circumstances Topic Paper (March 2024);
 - Spatial Strategy and Overall Approach Topic Paper (March 2024);
 - Site Allocation Topic Paper (March 2024);
 - Enfield Housing Topic Paper (March 2024);
 - Enfield Employment Topic Paper (March 2024).
2. These key Papers were only published after 6th March, i.e. after the Council were due to vote on the Plan and after the publication of the pre-draft ELP. We are therefore concerned that these Topic Papers have been written to fit chosen policies, not to gather objective evidence on which to base them.
3. On 19th March 2024 the Council approved the ELP for Regulation 19 consultation from 28th March to 20th May 2024. As of 19 May 2024 we had been copied on over 2,000 representations submitted by residents in response to the draft Plan, objecting in particular to the proposed allocation of Site RUR.02. The large number of submissions relative to the approximately 1,000 homes in Hadley Wood reflects the residents' strong belief that their views had been ignored and that the allocation of especially site RUR.02 is wrong.
4. This representation refers, as appropriate, to the National Planning Policy Framework (**NPPF**). That was updated in December 2023 and paragraph 230 makes clear that it applies to the examination of Plans that reach the Regulation 19 stage after 19th March 2024. References in this document are therefore to relevant sections of that most recent version of the NPPF.
5. The Regulation 19 ELP has materially increased the new homes target compared to the Regulation 18 version², from 24,920 to 33,280 (= +34%). The increase came without consultation or discussion, and the target is based on inaccurate application of guidance which, together with a failure to fully assess the full range of sites available, has resulted in an unsound Plan that proposes more than 9,400 new homes on land that is to be released from the Green Belt but for which the exceptional circumstances have not been adequately evidenced.
6. The plan-making process has been inadequate from beginning to end – from the lack of consultation and positive engagement with key stakeholders and local residents to the unsound housing target, flawed site assessments, weak exceptional circumstances evidence and inadequate information provided. As a result, and contrary to NPPF paragraph 35, the ELP fails most of the soundness tests, as

¹ <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan>

² <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan#local-plan-issues-and-options-consultation-2018>

well as legislation, especially as it relates to Site RUR.02 in Hadley Wood that is to be released from the Green Belt for development of 160+ homes:

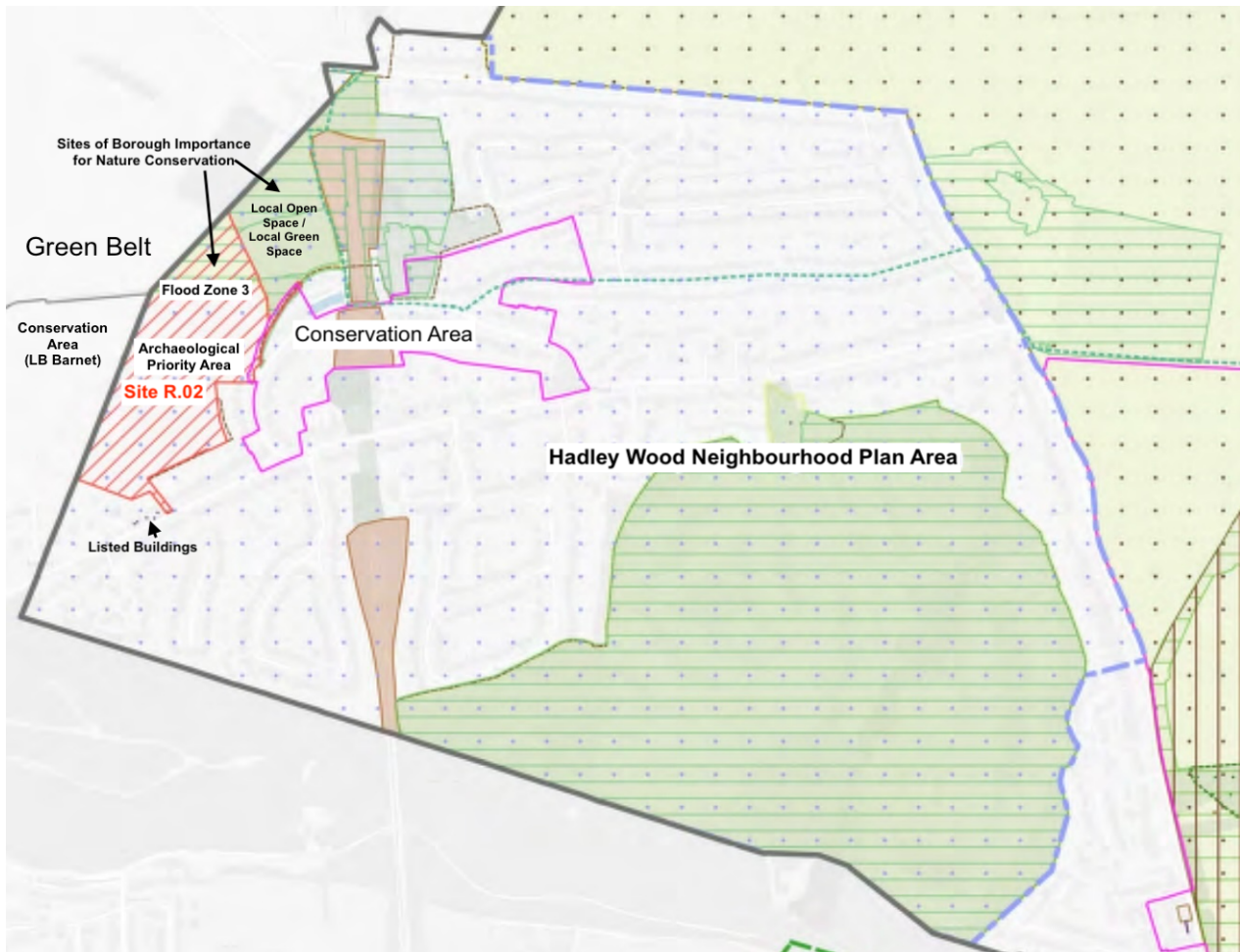


Figure 1: Map showing site RUR.02 and surrounding area (source: HWNPF)

Not Positively Prepared

- Housing target is capacity-based, i.e. sites put forward for development, not need.
- Extending the ELP to 2041 means there is no London Plan housing requirement.
- Not consistent with para 4.1.11 of London Plan and therefore Capacity-based approach is not justified.

7. Contrary to NPPF paragraph 35, the ELP is not positively prepared because it cannot be concluded that the proposed strategy will meet the objectively assessed needs.

7.1. After the GLA criticised LBE's new homes target methodology in its Regulation 18 consultation representation³, the ELP now states (in paragraph 8.5) that, as the London Plan only sets out housing targets to 2029, whereas national policy requires the Council to plan for 15 years, LBE has taken a capacity-based approach to set its target post-2029. The Council claims this is done in line with paragraph 4.1.11 of the London Plan, which states that:

³ https://www.enfield.gov.uk/_data/assets/pdf_file/0018/12681/Statutory-Consultee-Responses-Planning.pdf

If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.”

7.2. The Council claims to have drawn on:

- a) the 2017 London SHLAA (for large sites);
- b) rolling forward the London Plan’s housing capacity assumptions (for small sites);
- c) additional capacity resulting from committed transport infrastructure improvements; and
- d) identifying further local capacity.

7.3. However, there is nothing in the Evidence Base to suggest the Council have consulted with the GLA in the context of paragraph 4.1.11. during the Regulation 18 consultation the GLA objected to the proposed Green Belt releases and there is no evidence to suggest they have changed their view since then. Furthermore, paragraph 4.1.11 does not supersede or negate the general plan-making requirements including Green Belt policy. It may be possible to roll forward some housing numbers from the 2017 SHLAA, but that is not the same as justifying, on an iterative, fully reasoned, basis, the amount of Green Belt release now being proposed. The Council have misidentified paragraph 4.1.11 for the entire test.

7.4. However, the new homes target - which is central to the ELP and evidenced in the Housing Topic Paper (2024)⁴ - remains fundamentally flawed:

7.4.1. Sites that can potentially be developed are an important consideration, but the formal target number of new homes to be built should not be exclusively derived from possible supply, as the ELP does for the period 2029-2041. It does not necessarily follow that a site - such as RUR.02 - being put forward by the landowner renders its development needed, let alone does it provide a sound basis for release from the Green Belt, as the ELP proposes for a quarter of its new homes target.

7.4.2. Paragraph 4.1.11 of the London Plan states that, when the 2017 SHLAA findings and any local evidence of identified capacity are included, that should happen “*in consultation with the GLA*”.

- Paragraphs 2.37-2.54 of the Housing Topic Paper (2024) fail to reference this consultation requirement and such consultation having taken place.
- The Duty to Cooperate Statement (2024)⁵ refers to meetings with the GLA, but not in support of this aspect.
- The Mayor of London has strongly opposed LBE’s release of land from the Green Belt⁶ at Regulation 18 stage and it would therefore be most surprising, and inconsistent, for the GLA to support a housing target being derived from Green Belt sites that have been put forward for development by their owners.

7.4.3. Paragraph 4.1.11 of the London Plan furthermore states that plans “*should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements*”⁷.

⁴ https://www.enfield.gov.uk/_data/assets/pdf_file/0022/54526/Enfield-Housing-Topic-Paper-2024.pdf

⁵ https://www.enfield.gov.uk/_data/assets/pdf_file/0034/54979/Duty-to-Cooperate-Statement-Planning.pdf

⁶ https://www.enfield.gov.uk/_data/assets/pdf_file/0018/12681/Statutory-Consultee-Responses-Planning.pdf

⁷ https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

- Paragraph 2.52 of the Housing Topic Paper (March 2024) explicitly states that “As of now, no transport schemes have been identified within the plan period to provide additional capacity that could be applied as part of the 4.1.11 assessment”.
- Paragraph 7.26 of the Spatial Strategy and Overall Approach Topic Paper (2024)⁸ states that “Policy SS1 emphasises the importance of ensuring that new and improved infrastructure is delivered alongside new development. The infrastructure needed to support the Spatial Strategy and associated site allocations is set out in the Infrastructure Development Plan”. It is unclear whether this should read “Infrastructure Delivery Plan”, but neither the Infrastructure Development Plan⁹ nor the Infrastructure Delivery Plan¹⁰ (the Evidence Base only has an emerging draft of the latter) identifies infrastructure developments that impact Hadley Wood.
- The Integrated Impact Assessment states that “Areas such as Hadley Wood, Botany Bay and Crews Hill in the northwest are some of the least connected areas and the lowest PTALs in the Borough. It is possible that new services and facilities and transport links such as bus routes or cycle paths will be provided as part of new developments, particularly at larger sites, but this was not assumed in assessing site options.”¹¹

Not Justified

- Exceptional circumstances for Green Belt allocations not evidenced.
- Site RUR.02 assessment is superficial and flawed, with extensive reasons to support continued Green Belt designation.
- RUR.02 is a strongly performing site by reference to the Green Belt purposes.
- RUR.02 is an isolated and unsustainable development location.
- No ranking of Green Belt sites applied to inform the outcome of site allocations.
- Sustainability Appraisal did not factor in the degree of Green Belt impact/harm.
- Obvious SIL and brownfield sites not proactively explored, with reliance on Calls for Sites.
- Examples of PTAL 3-4 brownfield sites with potential for 3,500 housing units that were not considered.

8. Contrary to NPPF paragraph 35, the ELP’s strategy is not justified.

8.1. NPPF paragraph 145 states that ‘there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified’. The sequence of events associated with preparing the ELP clearly shows that decisions to release large areas from the Green Belt were made several years ahead of evidence being prepared to justify such a move. Furthermore, the evidence does not demonstrate that

⁸ https://www.enfield.gov.uk/_data/assets/pdf_file/0020/54515/ELP-spatial-strategy-and-overall-approach-topic-paper-Planning.pdf

⁹ https://www.enfield.gov.uk/_data/assets/pdf_file/0036/54999/Infrastructure-Development-Plan-Transport-Planning.pdf

¹⁰ https://www.enfield.gov.uk/_data/assets/pdf_file/0035/54998/Emerging-Infrastructure-Delivery-Plan-Planning.pdf

¹¹ F.38 on page F-24 of https://www.enfield.gov.uk/_data/assets/pdf_file/0014/55040/ELP-REG19-IIA-and-appendices-Planning.pdf

the exceptional circumstances have been met. Under the NPPF, the Council is not required to release Green Belt sites if it cannot meet its requirement. Therefore, before the Council concludes such land must be released it is necessary for them to consider all possible alternatives to meeting the need, as well as the Green Belt impacts, etc. That should have been done in a transparent way within the Sustainability Appraisal. As this is not the case the plan is unsound and fails the legal test.

- 8.2. The position here is clearly contrary to the correct application of the NPPF and is not in general conformity with the Local Plan requirements. This can be seen in the statement in the Housing Topic Paper paragraph 2.34: *“the housing requirement figure after 2029 is merely a sum of the allocations, insofar as they are judged to produce dwellings in the Plan Period.”*
- 8.3. The ‘exceptional circumstances’ test is a high bar/threshold that must be achieved, similar to the ‘very special circumstances’ that development in the Green Belt requires. Housing need alone is not sufficient to justify Green Belt release for housing. The Council claims it has evaluated all sites within the Borough and has identified neither sufficient brownfield land to meet its housing need nor sufficient previously developed land in the Green Belt. This is their justification for releasing Site RUR.02 (Land between Camlet Way and Crescent West) from the Green Belt for development of 160 homes. As detailed in paragraph 8.9 below, NPPF paragraph 125 requires local planning authorities to proactively seek sites. In essence, the Council is saying they cannot find any further brownfield sites in the Borough that could take 160 homes. Per paragraph 8.27 below, we believe that position to be untenable.
- 8.4. It is simply incorrect for the Council to state that sustainable development cannot be achieved without Green Belt release. The harm from the release of Site RUR.02 to that land and adjoining Green Belt land in the boroughs of Barnet and Hertsmere is far greater than the benefit of delivering just 160 homes. A site taking just 160 homes, representing a mere 0.48% of the 33,000 new homes to be built, cannot be described as a ‘Strategic Site’ that warrants Green Belt release. The Sustainability Appraisal did not factor in the degree of Green Belt harm/impact when assessing the various sites, and it is unclear what methodology the Council used in selecting the Green Belt sites to be released for development.
- 8.5. The fact that research and supporting evidence were developed to fit decisions made years earlier is demonstrated by the fact that the areas to be released from the Green Belt for development of over 9,400 new homes, in Crews Hill, Chase Park and Hadley Wood, were already detailed in the 2021 Regulation 18 draft ELP, three years before the Green Belt Exceptional Circumstances Topic Paper was published. There was no Green Belt Exceptional Circumstances Topic Paper published for the Regulation 18 draft ELP.
- 8.6. The Council is proposing to release vast areas of greenfield land from the Green Belt to compensate for its inability to facilitate sufficient housing development on brownfield land, such as the flagship Meridian Water project. The Green Belt allocations were not scaled back when additional potential urban capacity was identified, or after the 2023 NPPF update that gives local planning authorities the option of not releasing Green Belt land.
- 8.7. Paragraph 6.19 of the Spatial Strategy and Overall Approach Topic Paper (2024) states that *“given the growing demand for employment space and the low vacancy levels in several key locations, it was concluded that no land should be released from employment use to non-employment uses”*. This is contrary to paragraphs 124.d and 146 of the NPPF, London Plan policy H1 and the Mayor of London’s draft Good Quality Homes for All Londoners Guidance and draft Industrial Intensification Primer. These policies are breached more broadly as the Capacity Study Site Identification¹², which has not been updated since 2020, shows that LBE has failed to

¹² https://www.enfield.gov.uk/_data/assets/pdf_file/0026/4589/enfield-capacity-study-site-identification-2020.pdf

fully examine all other reasonable options for meeting its identified need for development, including:

- a) Publicly owned sites that are in active alternative use;
- b) vacant sites that are not in the development pipeline;
- c) industrial sites classed as “wider areas of search”; and
- d) Underutilised SIL sites in sustainable locations which could be developed for mixed uses to retain employment uses and provide housing.

8.8. The above is given emphasis in the NPPF. Paragraph 146 states that *‘before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority [i.e.: LB Enfield] should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.’* The NPPF makes clear that the examination of the Plan will consider whether as much use as possible is being made of previously developed land and under-utilised sites, and whether opportunities to optimise the density of development, particularly in town and city centres, have been pursued. Plainly, these steps have not been taken, as **the Enfield Capacity Study has not been updated since 2020 and there is no evidence of the alternative sources of supply having been fully assessed.** Until such a time as this has been undertaken LBE cannot reasonably conclude that exceptional circumstances exist to justify changes to the Green Belt boundaries.

8.9. The Green Belt Exceptional Circumstances Topic Paper (2024) published by LBE states, in paragraph 4.10, that it has *‘conducted multiple call for sites exercises to seek to identify as many potential development sites as possible’* and it has therefore *‘made as much use as possible for suitable brownfield sites and underutilised land’*. This argument is fundamentally flawed, as there is no guarantee that the Call for Sites process will result in landowners putting forward previously developed land or under-utilised sites. Responsibility for identifying and unlocking such sites lies with the Council, as reflected in NPPF paragraph 125, which states that:

‘Local planning authorities, and other plan-making bodies, 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, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.’

8.10. There is no evidence that LBE has taken such a proactive approach. Paragraph 4.15 of the Green Belt Exceptional Circumstances Topic Paper claims that the Urban Capacity Study [sic] is a *‘deep dive’*. It is not. The 2020 Capacity Study itself acknowledges that it is only *‘a snapshot in time’* and the report states that it will be gradually superseded in the Evidence Base underpinning the emerging Local Plan (paragraph 3)¹³. However, in the four years since the Study was published that has not happened and there is no evidence that the site categories outlined in paragraph 8.7 above have been fully explored.

8.11. Paragraph 4.17 of the Green Belt Exceptional Circumstances Topic Paper references LBE’s Small Sites Research¹⁴, issued in response to the housing target in the draft London Plan. Paragraph 1.6 of that document states that the Council *‘is not prepared to accept the target unless there is compelling evidence that it could be achieved’*. This position is to be noted, as it is the

¹³ https://www.enfield.gov.uk/_data/assets/pdf_file/0024/4794/enfield-capacity-study-policy-review-2020-planning.pdf

¹⁴ https://www.london.gov.uk/sites/default/files/ad_75_enfield_small_sites_research_2018_31_january_2019.pdf

contention of the HWNPF that LBE has not applied the same rigour to itself and has not produced the necessary evidence in support of its own Local Plan.

8.12. The Green Belt Exceptional Circumstances Topic Paper outlines that the Council's exceptional circumstances case for reviewing Green Belt boundaries at the strategic level is based on:

8.12.1. The need to identify an appropriate growth and spatial strategy, having considered other reasonable alternatives. We note that the Regulation 18 ELP already proposed to release the same Green Belt sites, even though the housing need was a significantly lower at 25,000 new homes. The rationale provided was that there was insufficient brownfield land. The Regulation 19 ELP has increased the housing target to 33,280 and, even though the Council found additional brownfield sites, they are still looking to release the same Green Belt sites.

8.12.2. The need to identify sufficient land to meet housing needs, including in terms of the provision of more family and more affordable homes. The HWNPF objected to the release of Site RUR.02 during the Regulation 18 consultation, on the basis that the Council had not considered all alternative sites that would have easily accommodated the 160 homes and avoided the need to release the Green Belt site. We continue to contend that the Council has omitted a number of obvious brownfield sites in sustainable locations that could provide substantially more than 3,500 homes in the Local Plan period. These sites are set out in paragraph 8.27 below.

8.12.3. The need to promote sustainable patterns of development, make best use of existing infrastructure, and ensure that new development is supported by the provision of new infrastructure. Having a mainline railway station does not make Hadley Wood a sustainable location. The PTAL of Site RUR.02 in Hadley Wood is 1b, the second lowest possible rating. The railway service runs into central London, but all other stops except New Southgate are outside the Borough. The bus service only runs once an hour between 10am to 2pm Monday to Saturday and only goes to Barnet High Street, which is again outside the Borough. There is no bus service on Sunday.

We commissioned Space Syntax to prepare a Walkability Index for Hadley Wood - a copy of their report can be found at Attachment 4. The Walkability Index is an analytic measure using a Space Syntax's proprietary Integrated Urban Model (IUM). The IUM combines street, pedestrian, cycle and public transport networks with land use. Each individual property is analysed in terms of the mix of uses located within a 15 minutes' walk. Their report concludes that the average Walkability rating in Hadley Wood was 7.8, materially below the Enfield Borough average of 24 and the London average of 60. This is due to the poor public transport connections, as well as inadequate cycle and pedestrian infrastructure.

As detailed in paragraph 9.2 below, Site RUR.02 cannot be considered a sustainable development location.

8.12.4. The capacity and other restrictions on meeting housing and employment needs. The Council has chosen to impose its own restrictions on the type of sites it has considered suitable for development. We have detailed 11 sites in paragraph 8.27 below, that could accommodate up to 3,500 homes. The Council has chosen to ignore all SIL sites, even though these sites encompass non-employment uses and could be redeveloped for mixed uses including residential, as has been done in other London boroughs.

8.12.5. *An assessment of the overall harm caused by the releases from the Green Belt.* The Council’s own Green Belt and MOL Study¹⁵ assesses Site RUR.02 as follows:

Contribution to Green Belt purposes:		
Purpose 1	<i>Check the unrestricted sprawl of large built-up areas</i>	Strong
Purpose 2	<i>Prevent neighbouring towns merging into one another</i>	Moderate
Purpose 3	<i>Assist in safeguarding the countryside from encroachment</i>	Strong
Purpose 4	<i>Preserve the setting and special character of historic towns</i>	Strong
Purpose 5	<i>Assist in urban regeneration, by encouraging the recycling of derelict and other urban land</i>	Strong
Harm of release:		
<i>Impact on distinction of adjacent Green Belt land</i>		Moderate
<i>Harm</i>		High
<i>Harm Scenarios</i>		High

The Final Report of the Green Belt and MOL Study states in respect of Site RUR.02 (then referred to as ‘LP465’):

Site Reference and Location	Assessment Reference	Assessment Area Justification	Harm of Releasing Whole Assessment Area
<i>LP465 – Land between Camlet Way and Crescent West</i>	<i>LP465</i>	<i>Site is isolated, adjacent to inset urban area and has clearly recognisable field boundaries.</i>	<i>Very High</i>

Site RUR.02 therefore scores ‘High’ on 4 of the 5 purposes of the Green Belt and on 2 of the 3 assessments of harm. The overall Harm of releasing the site is rated as ‘Very High’, and it is considered ‘isolated’. Even by the Council’s own assessment this site should remain part of the Green Belt and it is obvious that, contrary to the Council’s claim, the harm that would be caused by development was not considered.

8.12.6. *The opportunities available to help increase the beneficial use of the remaining Green Belt, including interventions that meet green infrastructure and biodiversity net gain objectives.* There is no Green Belt land adjoining Site RUR.02 within the Borough, as the site borders the boroughs of Barnet and Hertsmere.

In conclusion, the Council have not demonstrated that exceptional circumstances exist to remove Site RUR.02 from the Green Belt for housing development.

8.13. Paragraph 5.13 of the Spatial Strategy and Overall Approach Topic Paper (2024) misleadingly states that “*The IIA process has been iterative, with the Regulation 18 consultations allowing the Council time to properly explore the issues for the ELP, and the options for addressing these issues*”. LBE made virtually no noteworthy changes to the ELP based on the approximately 1,000 Regulation 18 representations submitted by Hadley Wood residents and the HWNPF’s extensive submission, supported by detailed expert reports. It is furthermore noted that:

¹⁵ https://www.enfield.gov.uk/data/assets/pdf_file/0027/54675/Green-belt-and-MOL-assessment-2023-Appendix-B1-Planning.pdf

- the Forum asked LBE to update the Statement on Regulation 18 Consultation¹⁶, as that fails to reflect the representations with respect to site SA45 (now: RUR.02) in a fair and balanced manner, with the Forum’s extensive comments not even being mentioned. The Council rejected the Forum’s request (note that unidentified changes have increased the Consultation Statement from 266 to 340 pages since July 2023).
 - The Statement on Community Involvement¹⁷ makes no reference to the Forum or neighbourhood planning bodies and there was no local engagement in Hadley Wood.
- 8.14. Paragraph 3.44 of the Housing Topic Paper (2024) states that “*the implications of releasing land from the Green Belt for development have been carefully evaluated through an Integrated Impact Assessment (IIA)*”. Per Appendix A of this document, some of the IIA scoring was unduly generous or plain wrong, but even the Council’s own IIA scores would lead a reader to conclude that Site RUR.02 should remain in the Green Belt.
- 8.15. Although published alongside the Regulation 18 version of the ELP, the Growth Topic Paper (2021)¹⁸ has not been updated to reflect the Council’s further research and the extensive representations, and Site RUR.02 remains identified and allocated for development.
- 8.15.1. The Paper links the release of Green Belt land with the need to meet development needs, with paragraph 6.16 stating that:
- ‘The level of growth is such that the Borough has had to rely on limited areas of the Green Belt to meet development needs, particularly if housing needs are to be met in full. This has resulted in the strategy directing growth in Crews Hill (an existing settlement) and Chase Park as an extended area of Enfield Chase; a new burial and memorial ground with associated facilities at Sloemans Farm for natural burials; and three sites for employment related uses. Whilst in Green Belt, these locations still support a pattern of planned and sustainable growth that offer opportunities for mitigation and compensatory improvements’.*
- 8.15.2. Paragraph 6.28 makes minor reference to development of Site RUR.02 helping to support ‘*a continuation of town-wide transformational changes and renewal*’. This statement is included without context or evidence. There are no changes or initiatives in Hadley Wood and the size of the proposed development is highly unlikely to generate the critical scale of mass and developer contributions necessary to support any ‘*transformational changes*’.
- 8.15.3. Section 8 of the Paper does not mention Site RUR.02 in the 18 pages on the approach to Green Belt land, whereas sites such as Crews Hill and Chase Park are extensively commented on.
- Put simply, there have not been, and are not planned to be, any transformational changes or renewal projects in Hadley Wood, and justification for release of the site from the Green Belt is not provided. Furthermore, the absence of supporting comments for release of the site suggest that it is not relied upon, and therefore not necessary, to meet the growth set out in the Local Plan.
- 8.16. Paragraph 2.28 of the ELP states that “*Caselaw precedent sets out that housing need in itself can constitute an exceptional circumstance*”. This statement is incorrect and is contradicted by

¹⁶ https://www.enfield.gov.uk/_data/assets/pdf_file/0012/53103/Enfield-local-plan-reg-18-consultation-statement-Apr-23-Planning.pdf

¹⁷ https://www.enfield.gov.uk/_data/assets/pdf_file/0018/38025/Statement-of-Community-Involvement-Revised-2023-Final-Planning.pdf

¹⁸ https://www.enfield.gov.uk/_data/assets/pdf_file/0008/12140/Growth-topic-paper-LBE-2021-Planning.pdf

paragraph 6.25 of the Spatial Strategy and Overall Approach Topic Paper, which correctly refers to ‘*site-specific exceptional circumstances*’, said to be evidenced in the Green Belt Exceptional Circumstances Topic Paper (note: per paragraph 8.18 below, that comment is incorrect as the Exceptional Circumstances Topic Paper in turn points to the Site Allocation Topic Paper).

- 8.17. However, the Green Belt Exceptional Circumstances Topic Paper¹⁹ only references Site RUR.02 twice and simply states that that the site is ‘*sustainably located*’, without providing supporting evidence. This is important to note: the rationale provided by LBE for Green Belt releases at Crews Hill and Chase Park is extensive; by contrast, the almost complete lack of reference to Site RUR.02 supports the HWNPF’s position that the exceptional circumstances for the release of this land from the Green Belt have not been evidenced. This is equally the case for the Growth Topic Paper (2021) – see paragraph 8.15 above.
- 8.18. Paragraph 5.1 of the Green Belt Exceptional Circumstances Topic Paper states that there are “*local exceptional circumstances specific to each proposed allocation. The details are provided in the Site Allocation Topic Paper*”.
- 8.19. The Site Allocation Topic Paper²⁰ briefly comments on Site RUR.02:

“Although the site sits within the Green Belt, it is at the edge of the urban area, and has excellent access to public transport – being directly adjacent to Hadley Wood station. There are also a number of local amenities/facilities located around the station. Green Belt land will be required to help ensure the Council can meet its housing targets. The viability of many of the urban sites is marginal, and evidence suggests they will not help meet needs – particularly in respect of family and affordable housing. Therefore, Green Belt release is also required to help meet the target. Findings from technical evidence indicate there may be viability constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required. The site is at the edge of the urban area and has good access to public transport being around 5 minutes walk from Hadley Wood Station and local bus routes. The site has the potential to deliver larger family sized homes through mansion blocks houses, housing.

The site has the potential to deliver improvements to north-south pedestrian and cycle connections with access points from Camlet Way and Crescent West, a to create a new pedestrian bridge over the Monken Mead Brook, and an improved connection to the station, whilst retaining the area North of the Monken Mead Brook as open space, as well as new publicly accessible open space. These benefits balanced with the strategic level exceptional circumstances set out above mean that the local level exceptional circumstances have been met for the site.”

- 8.20. The brief comments do not provide justification as to why Green Belt land will be required for the Council to meet its housing targets and the conclusion that “*These benefits balanced with the strategic level exceptional circumstances set out above mean that the local level exceptional circumstances have been met for the site*” is wholly unfounded, especially as even the comments are largely wrong:

8.20.1. “*the viability of many of the urban sites is marginal and evidence suggests they will not help meet needs, particularly in respect of family and affordable housing*” – wrong and unsupported statement:

- contradicts the Mayor of London’s CIL viability work undertaken to set the MCIL levels, and the work LBE have undertaken to set their own CIL levels.

¹⁹ https://www.enfield.gov.uk/data/assets/pdf_file/0032/54995/Exceptional-Circumstances-Topic-Paper-Planning.pdf

²⁰ https://www.enfield.gov.uk/data/assets/pdf_file/0028/54955/Site-allocation-topic-paper-for-regulation-19-Planning.pdf

- Applicants can submit a viability assessment to justify a lower level of affordable housing than policy, to ensure housing developments can be viably delivered in urban locations.
- The Council should not be looking to allocate Green Belt sites for housing due to viability, as national, London and Local Plan policies give adequate scope to ensure development is viable.
- The Council cannot look to release Green Belt sites by claiming that these are the only sites capable of delivering family housing, as many other sites can deliver such homes, and other councils around the country are able to meet the need through urban sites.
- The Whole Plan – Viability Update (2023) did not test the viability of sites producing 160 family homes on sites such as RUR.02, with the largest development being 35 homes, including flats and smaller terraced homes.
- Does not address the local need, as identified in the Hadley Wood Neighbourhood Plan, which stated that *“developers are encouraged to engage with the local community, who have expressed a need for downsizing opportunities and sheltered housing”*.

8.20.2. *“it has excellent access to public transport”* – false; the site is a PTAL 1b location, the lowest public transport accessibility score. The Integrated Impact Assessment acknowledges the issue, stating that *“Areas such as Hadley Wood, Botany Bay and Crews Hill in the northwest are some of the least connected areas and the lowest PTALs in the Borough”*.

8.20.3. *“directly adjacent to Hadley Wood railway station”* – false; the site is 400-650m from the station (via what would become the site’s entrance).

8.20.4. *“around 5 minutes walk from Hadley Wood station and local bus routes”* – false; only approximately 20% of the site is within a 5 minute walk/400m from the station, and the only bus route is the 399 that runs once an hour between 10am and 2pm Monday to Saturday - to a small shopping centre in Barnet that is half-vacant. The Webcat plan below shows the areas within 15 minutes’ public transport travel, which does not include Barnet or Cockfosters.

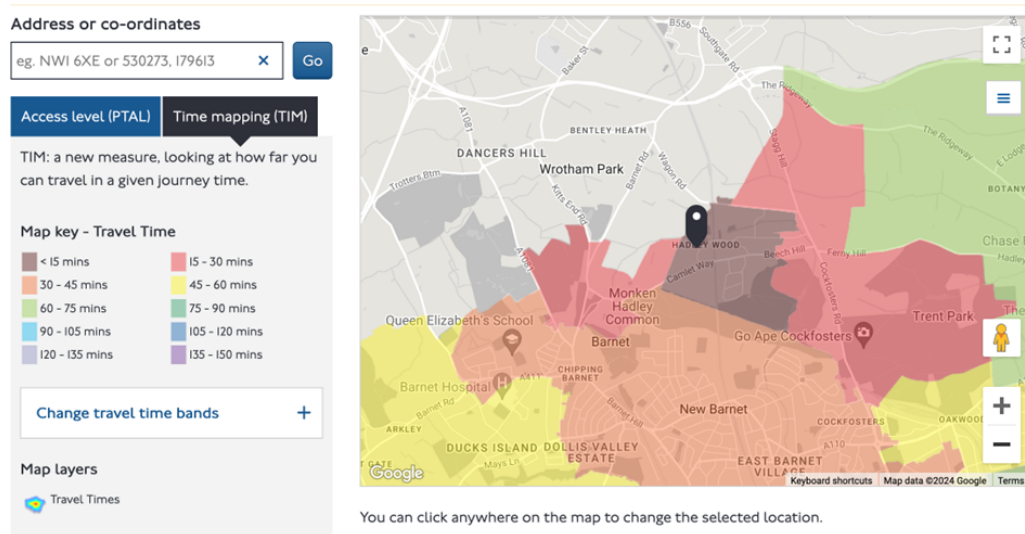


Figure 2: Map showing Time mapping (source: TfL)

- 8.20.5. *“a number of local amenities/facilities located around the station”* – false; the HELAA (2021)²¹ states that the site is *“located some distance from amenities”*. There are no NHS GP or dentist, pharmacy, secondary school, supermarket, indoor leisure facility, public house, restaurant, etc within active travel distance.
- 8.20.6. *“potential to deliver improvements to the north-south pedestrian and cycling connections”* – false; there are no amenities within walking distance, which explains why the western half of Waggon Road does not even have a pavement, and the steep inclines from the site make cycling difficult. Also, the access to the field north of Monken Mead Brook would be a planning requirement, not a new benefit.
- 8.20.7. *“affordable housing”* – false; we are not aware of any affordable housing in Hadley Wood and it would be difficult to service any affordable units given it is a car-dependent location with very limited local amenities.
- 8.21. The exceptional circumstances have not been evidenced for Site RUR.02 and, like the Growth Topic Paper (2021) discussed in 8.14 above, paragraph 3.44 of the Housing Topic Paper (2024)²² fails to mention the Hadley Wood site in its conclusion that *“The Council believes that there are the necessary exceptional circumstances to justify the release of the required land from the Green Belt to accommodate the planned development at Crews Hill and Chase Park”*.
- 8.22. It is noted that the compensatory improvements to the remaining Green Belt, referred to in the Green Belt Exceptional Circumstances Topic Paper, do not contribute evidence for the exceptional circumstances, and are directed to other parts of the borough.
- 8.23. NPPF paragraph 69(b) makes clear that there is no need for specific sites to be identified in years 10+ of a Local Plan period, with PPG 68-019-20190722 stating that, where sites in the 10+ year period are included, then *“plan-makers will need to demonstrate that there is a reasonable prospect that they are likely to come forward within the timeframe envisaged”*. Appendix E to the 2023 HELAA indicates that site RUR.02 is “potentially” suitable and “potentially” achievable, and concludes that it is “potentially” developable. The requirements are therefore not met.
- 8.24. The arguments to protect Site RUR.02 by retaining it in the Green Belt are compelling:
- 8.24.1. Paragraph 146 of the NPPF allows Green Belt boundaries to be changed to meet a development need if exceptional circumstances are evidenced. LBE have failed to meet either condition:
- Appendix C²³ to the ELP shows that Site RUR.02 is only available in 10+ years. The ELP has established its housing target for the period after 2029 based on capacity/supply, i.e. sites put forward for development. The housing need has not been determined after 2029, when the site will become available. This could therefore be dealt with at the next Local Plan review, when there will be more certainty on the actual housing need.
 - As detailed in paragraphs 8.14, 9.2.4 and 8.19 above, the Integrated Impact Assessment, Green Belt Exceptional Circumstances Topic Paper and Site Allocation

²¹ https://www.enfield.gov.uk/_data/assets/pdf_file/0016/12562/Housing-and-economic-land-availability-assessment-2021-Planning.pdf

²² https://www.enfield.gov.uk/_data/assets/pdf_file/0022/54526/Enfield-Housing-Topic-Paper-2024.pdf

²³ https://www.enfield.gov.uk/_data/assets/pdf_file/0031/55669/ELP-Reg19-Appendix-C-Site-Allocations-Planning.pdf

Topic Paper all fail to evidence the exceptional circumstances that could legitimately support release from the Green Belt.

8.24.2. LBE's Green Belt and Metropolitan Open Land Study scores the site 'strong' on four of the five purposes of the Green Belt²⁴ and rates the harm that development would cause as 'high'²⁵, with the Final Report²⁶ rating the overall harm of releasing the site as "very high" and stating "Site is isolated".

8.24.3. We commissioned Enplan to undertake a Landscape and Visual Appraisal of site RUR.02. A copy of their detailed Appraisal can be found at Attachment 2. Their conclusion (in Section 6) was that:

"The published Evidence Base includes a review of the Green Belt boundaries but no similar review of the Area of Special Character (AOSC), although policy DE11 of the draft plan imposes certain requirements on development proposals that affect AOSC.

AOSCs were first designated in the 1994 Unitary Plan, although the Hornbeam Hills South area was not included at that time. Through the Enfield Characterisation Study of 2011 and the Development Management Document 2014, the AOSCs were refined and expanded to include the Hornbeam Hills South area, including the potential allocation. The Council can, of course, decide not to bring forward AOSCs in the emerging plan, although the plan as drafted does make passing references to AOSCs, but such an approach would require justification and would not accord with the findings of the characterisation work. This assessment has found that the landscape to the north-west of Hadley Wood is of moderate to high value, of clear borough and countywide importance, and should be considered a valued landscape for the purposes of Paragraph 180 of the NPPF. It would, therefore, be appropriate to be included as or as part of landscape designation and accordingly afforded a higher level of protection, as envisaged by the NPPF.

LUC's Green Belt study for the Council finds that the contribution of the potential allocation to the Green Belt is strong and that harm of releasing it to Green Belt land would be at least High, possibly Very High, if corrected as this assessment proposes. Nevertheless, the Regulation 19 Consultation plan proposes allocation of the land. This assessment concludes that the potential visual effects on the publicly accessible locations within the countryside demonstrate that the development of the potential allocation would have an adverse visual effect on visual receptors enjoying the Local Open Space / Local Green Space and countryside to the west, north and north-east. A substantial magnitude of effect would be experienced by users of the Local Open Space / Local Green Space, in which the development's presence would detract from the attractive countryside and strongly contrast with the existing urban edge. The potential magnitude of the landscape effect would be a substantial adverse one, in which the development would become a prominent new characteristic feature of the landscape, would be seen to contrast with the existing attractive rurality and would stand out starkly against the existing leafy, low density urban edge.

²⁴ Page 2 of https://www.enfield.gov.uk/_data/assets/pdf_file/0029/54677/Green-belt-and-MOL-assessment-2023-Appendix-D-Planning.pdf

²⁵ Table 8.1 of https://www.enfield.gov.uk/_data/assets/pdf_file/0027/54675/Green-belt-and-MOL-assessment-2023-Appendix-B1-Planning.pdf

²⁶ https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf

Release of this land for development would have significant landscape and visual harms and that the harm to the Green Belt would be High, possibly Very High.”

- 8.24.4. Development of the land would increase the surface water flood risk to the railway line (see Appendix B).
- 8.24.5. The land is part of in the Farmland Valleys and Ridges, which LB Enfield’s Characterisation Study (2012)²⁷ described as “*a major asset for the borough. It is of both landscape and historical significance*” and states that “*The existing Green Belt boundary should be retained and protected, and future development and land use changes resisted*”.
- 8.24.6. The HELAA (2021)²⁸ notes that the site is Grade 3 agricultural land, and it is locally unique as it has not been cultivated or sprayed with chemicals. It has for centuries been used for grazing and much of it has a high sensitivity to change. Development of the site would cause material harm to biodiversity and, contrary to the Council’s Climate Action Plan, destroy a valuable carbon sink.
- 8.24.7. The land lies in the Enfield Chase and Camlet Moat Archaeological Priority Area, as designated by Historic England²⁹. It also classes the plot as ‘*High Risk*’, which “*means developments likely to cause harm to heritage assets of archaeological interest and fairly likely to cause significant harm*”.
- 8.24.8. We commissioned JB Consulting Heritage Ltd to undertake a Heritage Appraisal of site RUR.02. A copy of the Heritage Appraisal can be found at Attachment 3. The Appraisal concludes (in Section 7) that:

“At the local level, Enfield Council has prepared and adopted a heritage strategy for the positive ongoing management of the historic environment within the borough: ‘Making Enfield: Enfield Heritage Strategy 2019-2024’. This was adopted in 2019 and is therefore a material consideration in decision-making. It establishes a series of objectives and aims, including 010 which states:

Continue to manage the Borough’s heritage and its setting as appropriate to its significance through regulatory and planning functions and develop the instrumental value of heritage in place-making.

The ‘task’ to achieve the objective makes clear that this includes decision-making at the strategic planning stages:

Encourage sustainable and creative decision-making to conserve and enhance historic assets and their settings through strategic planning, Development Management and regulatory services.

The output makes clear the weight to be given to heritage assets at the strategic planning stages:

Ensure that substantial weight is given to heritage assets and their settings in decision-making and strategic planning and through creative approaches to growth.

The Council has identified in its own assessments at the Regulation 78 and 79 stages the potential for an adverse impact on designated heritage assets, rating the site ‘amber’.

²⁷ https://www.enfield.gov.uk/_data/assets/pdf_file/0011/6113/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf

²⁸ https://www.enfield.gov.uk/_data/assets/pdf_file/0016/12562/Housing-and-economic-land-availability-assessment-2021-Planning.pdf

²⁹ <https://historicengland.org.uk/content/docs/planning/apa-enfield-pdf/>

This is reinforced by the findings of potential harm in the assessment by LUC undertaken on behalf of the Council at both the Regulation 78 and 79 stages. In line with the Council's own adopted heritage strategy, substantial weight must be given to heritage assets and their settings at the strategic planning stage. As made clear in London Plan Policy HC7, it is important that the strategy is informed by an understanding of the heritage significance of those assets potentially affected and their settings.

The assessment undertaken in this report has identified the potential for an adverse impact that is unlikely to be capable of being mitigated to a degree such that it would avoid harm. On this basis, the appraisal set out above has demonstrated that the proposed development of this site would not contribute to a positive strategy for the conservation and enhancement of the historic environment. It would fail to sustain or enhance the significance of heritage assets, most likely giving rise to a series of harms impacting, at a minimum, two conservation areas and three listed buildings.

For the purposes of national planning policy, these are designated heritage assets. In decision-taking, the NPPF makes clear that great weight must be given to their conservation, irrespective of whether any potential harm amounts to substantial harm or less than substantial harm (paragraph 205).

The allocation of this site is not therefore considered to meet the NPPF's tests for soundness on historic environment grounds."

8.24.9. Development of the site would cause material harm to the immediately adjacent Hadley Wood and Monken Hadley Conservation Areas and listed buildings; one of the proposed development's entrances will actually be in the Hadley Wood Conservation Area and the other in the narrow gap immediately adjacent to a Grade II listed building. Paragraph 4.51 of the Green Belt and MOL Study (2023) states that "*the Green Belt land within and in key views out from the Registered Parks and Gardens and the Conservation Areas of Trent Park, Clay Hill, Enfield Lock and Ponders End and Hadley Wood are considered to have physical and/or visual relationships with Enfield's Green Belt*".

8.24.10. We prepared a Sustainability Audit for site RUR.02 a copy of which can be found at Attachment 5. The purpose of the Audit is to ascertain whether the redevelopment of site RUR.02 would be considered sustainable development and whether the mere presence of a railway station, irrespective of PTAL rating, is sufficient for the location to be assumed to be sustainable.

The audit 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.

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.

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 on the allocated site would put schools over capacity levels, and in doing so increase car usage, as residents are required to travel further to access schools.

There is no healthcare infrastructure within a walkable distance of the allocated site. The open and recreational space in the area is limited, but there are several large areas of open space within a walkable distance. Equally, the area provides a tennis club, but no gyms or indoor leisure centres, such as a swimming pool.

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 the inadequate cycle and pedestrian infrastructure, there would inevitably be an increase in private car trips to reach community infrastructure.

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. 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.

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 would adversely impact the environmental benefits of the area. The sustainability audit confirmed the IMD rating of high level of deprivation of barriers to housing and services. It shows 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.

Overall, the proposed residential allocation of RUR.02 would not be considered a sustainable location for development and the allocation should be removed from the Local Plan.

- 8.24.11. Proximity to a railway station alone does not make the site a sustainable development location; Hadley Wood lacks educational and leisure facilities, shopping, NHS GP and dentist practices, pharmacy, public house or restaurants, and employment, with the PTAL 1b score confirming poor public transport accessibility. Hadley Wood is car-dependent, as explicitly recognized by TfL in its representation in the Regulation 16 consultation of the Hadley Wood Neighbourhood Plan. Large scale development will add to the cumulative adverse traffic impact and air pollution, which is contrary to the Council's Climate Action Plan. The Baseline Transport Review indicates that Hadley Road and Cockfosters Road already operate at >100% of capacity during peak hours³⁰, with the proposed development of over 9,200 new homes in nearby Chase Park and Crews Hill adding very material additional congestion.

³⁰ See Figures 3-11 and 3-12 of https://www.enfield.gov.uk/_data/assets/pdf_file/0010/12142/Transport-baseline-review-WSP-2021-Planning.pdf

- 8.24.12. The GLA stated³¹ that exceptional circumstances for the release of Green Belt land could not be justified, that the locations for release were unsustainable, did not contribute to meeting housing need, and undermined the delivery of previously developed land.
- 8.24.13. The Duty to Cooperate statement does not reference the Green Belt, even though site RUR.02 is on the border of LB Enfield with LB Barnet and Hertsmere. Both authorities are concerned about the harmful impact of development on the Green Belt and heritage assets. LB Barnet notes in the Statement of Common Ground³² that it “*is concerned that any development on this site should not have a significant detrimental effect on the openness of the Green Belt*”. Also, as the site is adjacent to the Monken Hadley Conservation Area, it adds that “*The Council will resist proposals which have a harmful impact on the Conservation Area’s character and appearance, including its setting*”.
- 8.24.14. Development of Site RUR.02 is contrary to Placemaking and Design policies, as well as numerous other ELP policies, which state that:
- PL9 – *the open and historic character of rural Enfield (as shown on the Policies Map [...]) will be protected and enhanced in line with Green Belt and MOL policies.* Note that the Policies Note identifies Site RUR.02 as an Area of Archaeological Priority.
 - RE1 – *development adjoining the Green Belt will only be permitted where it does not have a detrimental effect on the visual amenity of the landscape and openness of the Green Belt, vies and vistas into urban areas and vice versa, especially at important access points, are uninterrupted and maintained, and it reinforces and better reveals the character, appearance and significance of heritage assets and the historic landscape.*
 - SS2 – *development should create places where active travel modes predominate and where everyday services are within easy walking and cycling distances.*
 - DE13 – *new residential development will only be supported if it is appropriately located, taking into account the surrounding area and access to local amenities.*
 - T3 – *a Transport Assessment should identify key local services, including shopping, education, healthcare, and green spaces within a 20 minute active travel zone from the development site. Larger developments should contain all key local services to further reduce the need for travel on existing, often congested networks. Developments should have minimal impact on existing transport networks, particularly residential neighbourhoods.*
 - D3 – *applicants must demonstrate that sufficient infrastructure capacity exists or will be made available to support the development over its lifetime.*
 - H4 – *new development must avoid harm to the amenity of surrounding properties, and not have an unacceptable adverse impact on biodiversity and green infrastructure.*
 - ENV1 – *proposals must be designed to minimise the adverse impacts of light pollution on adjacent occupiers and natural habitats, biodiversity and the ecology of watercourses.*
 - BG2 – *development affecting a Site of Importance for Nature Conservation will only be supported where the mitigation strategy per the London Plan has been applied; it*

³¹ https://www.enfield.gov.uk/_data/assets/pdf_file/0018/12681/Statutory-Consultee-Responses-Planning.pdf

³² <https://www.barnet.gov.uk/sites/default/files/LB%20Enfield%20SCG.pdf>

will protect, restore, enhance and provide appropriate buffers around wildlife and geological features; and the benefits of the proposed development would clearly outweigh the adverse impact on biodiversity and geodiversity.

- DE11 – *proposals will be expected to take account of the quality, distinctiveness, and the sensitivity of the Borough’s Areas of Special Character and other areas of landscape character, and restore, conserve and enhance that.*
- SE1 – *the Council will work with partners to reduce all sources of flood risk; safeguard the role of the natural environment as a biodiverse resource and as a carbon sink; and maximise the role of the natural environment in delivering measures to reduce the effects of climate change, with green infrastructure playing an important role.*
- SE7 – *new development must prevent the loss of areas of soft landscaping and maximise the use of blue-green infrastructure as potential sources of flood storage.*
- DE10 – *great weight will be given to the conservation of heritage assets. Enfield Council will support development which responds to the setting heritage assets in a positive manner which conserves and enhances those elements of setting which make a positive contribution to significance.*
- SC2 – *Contributions will be sought towards new school places to meet the needs arising from new housing development, taking account of available capacity within existing schools and the number of pupils it will generate, from early years through to secondary education.*
- E9 – *proposals for 10 or more residential units will be required to secure local employment at both the construction and end-use phases.*

8.24.15. The Hadley Wood Neighbourhood Plan, adopted in November 2023, did not release any Green Belt land and was approved at a public referendum by 95% of the votes cast. The Plan makes clear its intent to reinforce the Green Belt around Hadley Wood and the special qualities of this in terms of its setting, contribution to local character and identity, historic importance and relationship with the built form.

8.24.16. The August 2023 examiner’s report for the Hadley Wood Neighbourhood Plan³³ acknowledged (in paragraph 4.11) that the HWNPF had put forward robust reasons for its opposition of development of the site. The examiner furthermore noted the considerable number of objections and the Mayor of London’s representation, which contended that there was sufficient capacity without allocating Green Belt sites, the exceptional circumstances had not been established, the areas offer very low public transport accessibility and more car-dependent development risks undermining the Mayor’s Good Growth objective.

8.25. Paragraph 146 of the NPPF states that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This has not occurred. The Council has omitted a number of brownfield sites that could come forward within the Local Plan period and has ignored all SIL sites, so as to be able to release easy Green Belt greenfield land for development.

8.26. In the 2024 ‘London Plan Review, a Report of Expert Advisers’³⁴, there is a recommendation that the London Plan be altered so there is “a strong presumption in favour of granting planning

³³ https://www.enfield.gov.uk/_data/assets/pdf_file/0014/42800/HWNP-Examiners-Report-August-2023-Planning.pdf

³⁴ <https://www.gov.uk/government/publications/housebuilding-in-london-london-plan-review-report-of-expert-advisers#:~:text=The%20report%2C%20received%20by%20the,in%20favour%20of%20brownfield%20development>

permission for proposals which comprise or include residential development on Brownfield (Previously Developed) land.” However, the authors were unable to agree unanimously whether sites within Strategic Industrial Locations (SILs) should be excluded from the presumption. The competing opinions on the issue were summarised as follows:

- Should be excluded, because of the critical economic importance of SIL and the potential amenity and agent of change considerations of introducing residential development into SILs; OR
- Should be included, because any harm which would arise from proposed residential development within a SIL, e.g. in terms of the loss of a site which would or could otherwise contribute to London’s ‘main reservoir of land for industrial, logistics and related uses’ and/or any amenity/agent of change issues, would be considered in the assessment of applications. If any such harm significantly and demonstrably outweighed the benefits of providing new homes, permission should be refused.

Being unable to agree, the authors have left it to the Secretary of State to decide whether the presumption should apply to sites within SILs. A decision by the Secretary of State is expected by this summer. If she or he decides that the presumption should apply to sites within SILs there will be zero justification for Site RUR.02 to be removed from the Green Belt, as the Council will be able to find substantially more than 160 homes from SIL sites.

- 8.27. We have identified at least 11 brownfield sites with a PTAL rating of 3 or 4 that could in aggregate deliver up to **3,500 housing units** but that the Council did not include in their assessment, or incorrectly ruled them out. If one or more of these were delivered within the Plan period it would remove the need to allocate site RUR.02 for development of 160 units.

The brownfield sites are set out below, together with our assessment of how many homes they could potentially deliver:

Royal Mail Sorting Office Savoy Parade, Enfield EN1 1AA

This site is situated in Enfield Town centre, immediately next to the Tesco store which is allocation site 1.3 (Tesco, Southbury Road). The Royal Mail site extends to 0.39 hectares and has a PTAL rating of 3. The site would be available within 5-10 years, given the industry is moving to larger, more modern, sorting offices that cater more for parcels than letters. Using the same density of development as allocation site 1.3, of 174 units per hectare, the site would be able to deliver 67 housing units.

ASDA, 130 Chase Side, London N14 5PW

This site was excluded from the process on the basis that, whilst the Council own the freehold interest, the property was leased out to ASDA on a long lease. This would be no different to ASDA owning the freehold and deciding to redevelop the site. The site extends to 1.5 hectares and has a PTAL rating of 4. There are numerous examples of residential development above supermarkets in London. This would be a prime candidate and could be facilitated by the Council in 10+ years. Using a reduced development density of 75 homes per hectare, the site could deliver 112 housing units.

M&S, 21 Winchmore Hill Rd, London N14 6AQ

This site was excluded from the process on the basis that it wouldn’t come forward within 15 years. It is located on the other side of the underground line to site allocation 6.1 (Southgate Office Village). The Local Plan goes out to 2041 and the site would therefore be capable of being

delivered within the Plan period. The site extends to 0.46 hectares and has a PTAL rating of 4. There are numerous examples of residential development above supermarkets in London. Using the same development density, of 392 homes per hectare as site 6.1, the site could deliver 182 housing units in 10 years +.

Southgate Leisure Centre, Winchmore Hill Rd, London N14 6AD

This site was not assessed. The site is owned by the Council, who operate the leisure centre and is sited adjacent to the M&S mentioned above. The site extends to 0.56 hectares and has a PTAL rating of 4. The site could be redeveloped into a new leisure centre with residential apartments above that. Using the same development density, of 392 homes per hectare as site 6.1, the site could deliver 220 housing units in 5-10 years.

De Mandeville Gate Retail Park, 333 Southbury Rd, Enfield EN1 1TW

This site was not assessed and immediately adjoins allocation site 2.3 (Morrisons Southbury Road). The site comprises four retail warehouse units and uses the same access road as the Morrisons allocation. The site extends to 1.47 hectares and has PTAL ratings of 3 and 4. The future of retail is changing and this property will be ripe for redevelopment. Using the same development density as site 2.3, of 240 homes per hectare, the site could deliver 352 housing units in 5-10 years.

DFS, Great Cambridge Rd, London EN1 1UJ

This site was not assessed and immediately adjoins allocation site 2.3 Morrisons Southbury Road. The property comprises a retail warehouse unit with rear storage. The site extends to 0.81 hectares and has a PTAL rating of 3. The future of retail is changing and this property will be ripe for redevelopment. Using the same development density as site 2.3, of 240 homes per hectare, the site could deliver 195 housing units in 5-10 years.

Furniture Village and Sofology, 98 Great Cambridge Rd, Enfield EN1 1UJ

This site was not assessed and immediately the DFS (see previous site), which adjoins allocation site 2.3 (Morrisons Southbury Road). The property comprises two retail warehouse units. The site extends to 0.74 hectares and has a PTAL rating of 3. The future of retail is changing and this property will be ripe for redevelopment. Using the same development density as site 2.3, of 240 homes per hectare, the site could deliver 178 housing units in 5-10 years.

Stephen James BMW, Lincoln Rd, Enfield EN1 1SW

This site was not assessed and is located immediately adjacent to Furniture Village (see previous site), which, together with the DFS, adjoins allocation site 2.3 (Morrisons Southbury Road). The property comprises a motor dealership with large forecourt sales areas. The site extends to 0.94 hectares and has a PTAL rating of 3. The future of car dealerships is changing and this property will be ripe for redevelopment to include a car showroom at ground level and housing above. Using the same development density as site 2.3, of 240 homes per hectare, the site could deliver 224 housing units in 5-10 years.

Enfield Retail Park, Great Cambridge Rd, Enfield EN1 1TH

This retail park site is situated immediately adjacent to site allocation 2.6 (Sainsburys Crown Road). The property comprises a retail park with a very large car park. The site extends to 4.62 hectares and has a PTAL rating of 3. This retail park could be redeveloped to provide the retail

at ground floor level, with housing above. Using the same development density as site 2.6, of 222 homes per hectare, the site could deliver 1,027 housing units in 10+ years.

British Car Auctions, 620-640 Great Cambridge Rd, Enfield EN1 3RL

This property comprises a large hardstanding area, which is used for the storage of cars, and is sited next to the Enfield Retail Park (see previous site). It used to house a live car auction, but the auctions are now held online and the cars are only stored at the site while awaiting collection. The site partly sits in a SIL area and was therefore dismissed. This is not a good use of SIL land and could be redeveloped into mixed uses to allow for the parking of vehicles at ground level, with housing development above, so the employment use would continue but the site would also contribute to housing supply. The site extends to 3.77 hectares and using the same development density as site 2.6, of 222 homes per hectare, the site could deliver 837 housing units in 5-10 years.

Builders Depot, Station Rd, Arnos Grove, London N11 1QJ

This site was not assessed and immediately adjoins allocation sites 7.1 (Former Gasholder, New Southgate) and 7.2 (Aldi, New Southgate). The property comprises a large builders' merchants, with outside storage. The site extends to 1.19 hectares and has a PTAL rating of 4. The property will be ripe for redevelopment within the same period as the other two adjoining allocations. Using the same development density as sites 7.1 and 7.2, of 148 homes per hectare, the site could deliver 177 housing units in 5-10 years.

Not Consistent with National Policies and Legislation

- **RUR.02 is not a sustainable development location.**
- **ELP was not shaped by early, proportionate and effective engagement between plan-makers and communities and local organisations.**
- **ELP does not take into account the Regulation 18 representations and the policies and aspirations of the recently adopted Hadley Wood Neighbourhood Plan.**
- **ELP is based on decisions made before evidence was compiled, with the mass of documents not linking up and failing to provide sound evidence for proposals.**

9. Contrary to NPPF paragraph 35, the ELP is not consistent with national policies, and with legislation.
 - 9.1. Contrary to NPPF paragraph 11, the ELP proposal to develop 160+ homes on Site RUR.02 does not represent a viable pattern of development, as it:
 - 9.1.1. *Does not meet the development needs of the area.* The development needs are already being met in the area, and will continue to be met, with more than the 160 homes required per policy SS1 being delivered in Hadley Wood within the Plan period, without any Green Belt release.
 - 9.1.2. *Does not align growth and infrastructure.*

- The HELAA (2021)³⁵ stated that Site RUR.02 is *“Located some distance from amenities”*;
- Site RUR.02 is in a PTAL 1b location, reflecting poor public transport accessibility:
 - Only approximately 20% of the site is within 400m / 5 minute walking distance from the railway station;
 - The railway line is useful for travel into central London, but is of no use for local east-west travel to Barnet and Enfield town centres;
 - Only 16% of Outer London journeys to work are by national rail according to the Government’s Modal Comparisons data;
 - Only one bus route - an hourly service between 10am and 2pm Monday to Saturday – crosses Hadley Wood on its short journey to Barnet Spire;
 - TfL’s Regulation 16 representation to the Hadley Wood Neighbourhood Plan states that *“As noted, the area is very car-dependent and this mitigates against bus service improvements”*.
 - Paragraph 2.52 of the Housing Topic Paper (March 2024) explicitly states that *“As of now, no transport schemes have been identified within the plan period to provide additional capacity that could be applied as part of the 4.1.11 assessment”*.
 - Per paragraph 0.-1010237262.859364425.³⁶ above, neither the Infrastructure Delivery Plan nor the Infrastructure Development Plan identifies infrastructure improvements that would help Hadley Wood.
- The Regulation 18 representation submitted by the HWNPF³⁶ noted that *“between 2000 and 2018, the number of housing units in Hadley Wood increased by 35% and now comprises over 900 homes. This growth has occurred without local amenities being improved, thus increasing car-dependency. Also, the increase in homes, hardstandings and outbuildings has resulted in frequent floodings, as sewers and drains have not been improved”*. It is noted that the increase in housing units occurred without any Green Belt release.

9.1.3. Does not improve the environment.

- Construction of a large housing development on high performing Green Belt grassland inevitably has a material adverse effect on the environment, wildlife and biodiversity.
- On 12 May 2024 the CEOs of the National Trust, RSPB, Wildlife Trust and Woodland Trust voiced their alarm over the decline of the UK’s natural environment, with one in six species now at risk of extinction, and asked that the issue plays a key role in this year’s general election.
- Contrary to NPPF paragraphs 124 and 165-171, building large scale housing on this undeveloped land will increase the surface water flood risk downstream, most notably to the railway line, which is in a Flood Zone 3 – see Appendix B.

³⁵ https://www.enfield.gov.uk/_data/assets/pdf_file/0016/12562/Housing-and-economic-land-availability-assessment-2021-Planning.pdf

³⁶ <https://www.hadleywoodnp.co.uk/green-belt-local-plan>

9.1.4. *Does not mitigate climate change (including by making effective use of land in urban areas).*

- Destruction of 11ha of centuries old grassland that serves as a valuable carbon sink inevitably adversely affects the fight against climate change.
- The ELP fails to make full effective use of land in urban areas. For example, it is unclear how many of the repeatedly stated ‘10,000’ new homes in Meridian Water are included in the Plan period and, similar to our own review, the State of Brownfield 2019 report³⁷ by the Campaign to Protect Rural England identified brownfield sites in LBE that could accommodate over 37,000 new homes, more than ten times the 2,170 that were on the Council’s most recent report at the time (Dec 2017).
- The release for development of Site RUR.02, being on the edge of the Green Belt and poorly serviced by public transport, is contrary to NPPF paragraph 147.

9.2. Contrary to NPPF paragraph 16, the ELP’s proposal to develop 160+ homes on Site RUR.02 would not represent sustainable development:

9.2.1. The ELP documents do not define ‘sustainable development’ locations, and it is therefore unclear on what basis the Housing Topic Paper (2021) concludes in respect of Site RUR.02 (then referred to as SA45): *“Site is located in the Greenbelt, but is in a highly sustainable location”*.

9.2.2. NPPF paragraph 7 states that *“the objective of sustainable development can be summarized as meeting the needs of the present without compromising the ability of future generations to meet their own needs”*. NPPF paragraph 11 outlines what the presumption in favour of sustainable development means for plan-making. Section 9.1 above details why allocation of Site RUR.02 for development does not comply with the sustainability parameters contained in said NPPF paragraph 11.

9.2.3. As stated in the HELAA (2021), Site RUR.02 is *“Located some distance from amenities”* and the Green Belt and MOL Study states *“Site is isolated”*, and none of the following are within walking distance:

- Early years facilities for ages 0-4. Based on GLA data the development of Site RUR.02 would increase demand for early years schooling by 61 spaces, which significantly exceeds the 7 spaces available ‘locally’ (including in LB Barnet) according to 2018-2023 Ofsted reports.
- Primary school places; the single entry form Hadley Wood primary school is already oversubscribed and the school operates a waiting list.
- Secondary school.
- Sixth-form college.
- NHS GP or dental practice.
- Pharmacy.
- Hospital (nearest, in Barnet, is a 36 minutes’ journey by public transport).
- Police station (nearest, in Edmonton, is 11.4km away).
- Library.

³⁷ https://www.cpre.org.uk/wp-content/uploads/2019/11/State_of_Brownfield_2019.pdf

- Gym.
- Indoor leisure facilities.
- Post office or bank branch.
- Shopping.
- Public house, bar or restaurant.
- Employment.

9.2.4. Site RUR.02 was treated inconsistently and should have been dropped early in the Site Assessment Process (SAP), as summarised in Table 1 of Appendix 1 of the Site Allocation Topic Paper (2024)³⁸.

9.2.5. Stage 2 of the SAP is detailed in Appendix A, section 4 of the Housing Topic Paper (2021)³⁹.

- Sites were allocated a priority rating, based on classifications listed in Table 2:

Priority	Description	Approach to allocation
4	greenfield sites in accessible, lower performing Green Belt location	Potential allocation less likely, unless exceptional circumstances
5	greenfield sites in accessible, moderately performing Green Belt location	
6	greenfield sites in accessible, high performing Green Belt locations	
7	brownfield in isolated location	No allocation, unless exceptional circumstances
8	greenfield in isolated low or moderately performing Green Belt location	

- It is unclear why there is no 'Priority 9', for Greenfield in isolated high performing Green Belt locations.
- It is equally unclear how the priority ratings were used, but the Site Allocations Topic Paper states that "**Sites where analysis suggests the land makes an important contribution to the purposes of the Green Belt will generally be deemed unsuitable**". (The comment is repeated in Appendix C of the 2023 HELAA.)
- Furthermore, the priority score for each site does not appear to be published; we submitted a FOI request, but the reply did not provide the information. However, as mentioned in paragraph 9.2.1 above, Site RUR.02 (then labelled 'SA45') was included in the list of sites to be allocated (per Appendix B) with the simple comment: "*Site is located in the Greenbelt but is in a highly sustainable location*".
- As stated in paragraph 9.2.1 above, it is unclear why Site RUR.02/SA45 was considered to be in a '*highly sustainable location*', and we note that Appendix C shows the similarly positioned 'Land to the North of Crews Hill Station' as excluded because "*The site is high performing Green Belt and is an isolated location*". Although sustainability was not defined, the comments on the Crews Hill site prove that proximity to a railway station was not determinant.
- Furthermore, the '*Land north of Waggon Road*' in Hadley Wood, which is close to Site RUR.02, was excluded because of its '*isolated location*'.

³⁸ https://www.enfield.gov.uk/_data/assets/pdf_file/0028/54955/Site-allocation-topic-paper-for-regulation-19-Planning.pdf

³⁹ https://www.enfield.gov.uk/_data/assets/pdf_file/0029/11999/Housing-Topic-paper_all-appendices-2021-Planning.pdf

In summary, the priority ranking of sites was flawed, and it is unclear how the rankings of Green Belt sites informed the site selection, or indeed the housing target.

9.2.6. The IIA (2024)⁴⁰ states in paragraph 2.53 that all ‘*Isolated Green Belt Sites*’ were excluded in Stage 2 of the Site Assessment Process and notes on page 31 of Appendix A - in response to the HWNPF’s representation in the ELP’s Regulation 18 consultation - that “*The Green Belt and Metropolitan Open Land Study Informed Stage 2 of the Site Selection Process*”.

9.2.7. The Green Belt and MOL Study (2023)⁴¹ repeats the comments contained in the 2021 draft, and states in:

- Paragraph 4.35 - “*Although there is a narrow physical connection between Hadley Wood and the main metropolitan area, it is relatively small and thus Hadley Wood can be perceived as a separate settlement within its own setting*”.
- Table 8.1 – states in respect of Site RUR.02: “*Site is isolated*”.

9.2.8. As an isolated Green Belt location, Site RUR.02 should have been dropped in Stage 2 of the Site Assessment Process. The allocation, when the ‘*Land north of Crews Hill Station*’ and the ‘*Land north of Waggon Road*’ were both excluded on the basis of their isolated location, is inconsistent and reflects LBE’s determination to ignore evidence and pursue its foregone conclusion, reached years earlier, that Site RUR.02 should be released from the Green Belt for development.

9.3. Contrary to NPPF paragraph 16, the ELP was not shaped by early, proportionate and effective engagement between plan-makers and communities and local organisations:

9.3.1. Contrary to the government’s Consultation Principles 2018⁴² and the Consultation Principles detailed in LB Enfield’s Statement of Community Involvement 2023⁴³, LBE have failed to engage with the HWNPF.

9.3.2. Contrary to section 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, LBE have, especially with respect to Site RUR.02, failed to take into account the objections and representations submitted by almost 1,000 local residents, the Forum and the Mayor of London, which were acknowledged in the examiner’s report on the Hadley Wood Neighbourhood Plan. Paragraph 6.27 of the Spatial Strategy and Overall Approach Topic Paper is therefore misleading in stating that “*the [Regulation 18] consultation feedback was considered in preparing the publication draft ELP*”.

9.3.3. The undated ‘*Statement on Regulation 18 Consultation*’⁴⁴, as published on the Council’s website, has been increased from 266 to 340 pages since July 2023. Changes have not been identified, but page 29 and further add comments on how (Regulation 18) representations have allegedly been taken into account. However:

- Only minor wording and drafting changes were incorporated.

⁴⁰ https://www.enfield.gov.uk/_data/assets/pdf_file/0014/55040/ELP-REG19-IIA-and-appendices-Planning.pdf

⁴¹ https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf

⁴² https://assets.publishing.service.gov.uk/media/5aafa4f2e5274a7fbc4fbac/Consultation_Principles_1.pdf

⁴³ https://www.enfield.gov.uk/_data/assets/pdf_file/0018/38025/Statement-of-Community-Involvement-Revised-2023-Final-Planning.pdf

⁴⁴ https://www.enfield.gov.uk/_data/assets/pdf_file/0012/53103/Enfield-local-plan-reg-18-consultation-statement-Apr-23-Planning.pdf

- Material comments and objections were not commented on, simply noted and/or dismissed with vague statements – see next point.
- For example, page 86 states: *“Objection noted in relation to Hadley Wood and the impact of development on social infrastructure, particularly in relation to GPs and education provision. However, the Local Plan seeks to create a positive framework for managing growth over the plan period, in line with the NPPF. The Council will use the Community Infrastructure Levy to fund strategic infrastructure necessary to deliver the vision set out in the Local Plan, including the ambitions outlined within the Place-specific policies, where appropriate, and with the priorities identified in the Council’s Infrastructure Delivery Plan”*. LBE’s comments do not reflect the complexities associated with the delivery of new infrastructure such as health services, which are mostly funded through general taxation and NI contributions. S106 agreements and CIL can contribute towards improvements but cannot guarantee that new services can and will be provided. We furthermore note that neither the place-specific policies nor the Emerging Infrastructure Delivery Plan indicate any improvements planned for Hadley Wood.

9.3.4. Contrary to section 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Statement on Regulation 18 Consultation failed to reflect the representations with respect to site SA45 (now: RUR.02) in a fair and balanced manner. The HWNPF’s request for that to be corrected was rejected by the Council.

9.3.5. Contrary to PPG 61-006-20190723, LBE have not considered the Hadley Wood Neighbourhood Plan⁴⁵ that was made on 22nd November 2023 and which:

- extensively comments on the Green Belt in and around Hadley Wood and states in Aspiration HW-iii that *“This Neighbourhood Plan proposes that Green Belt boundaries and designations within and surrounding Hadley Wood remain unchanged”*;
- through Policy HW-5, extends the duty to care to protect and enhance to non-statutory heritage assets. The Policies Map that accompanies the ELP shows Site RUR.02 being an Archaeological Priority Area, reflecting Historic England’s designation. The latter’s website states that development of an area exceeding 2ha (Site RUR.02 is 11ha) would be classed as ‘High Risk’, which *“means developments likely to cause harm to heritage assets of archaeological interest and fairly likely to cause significant harm”*.

9.4. Contrary to NPPF paragraph 21, the ELP does not make it sufficiently clear that the policies of the recently adopted Hadley Wood Neighbourhood Plan on, inter alia, building height, tree replacement, front gardens, roof shapes and apartments, will continue to apply in the Neighbourhood Plan Area. Paragraph 1.17 of the ELP states that *“development proposals within the Hadley Wood area will be assessed using the new ELP, as well as the Neighbourhood Plan”*, however, as detailed in paragraphs 10.13 and 10.14 below, LBE’s Planning team have not been applying the new Neighbourhood Plan’s policies as expected, and an unambiguous statement should therefore be added to the ELP – see paragraph 10.15 below.

9.5. Contrary to NPPF paragraph 31, topics and issues are dealt with across an unwieldy mass of documents that are almost incomprehensible to follow and in some instances are contradictory. The impression is of stand-alone documents that were developed in isolation by different workstreams and consultants. This is again reflected in separate consultations currently taking

⁴⁵ https://www.enfield.gov.uk/_data/assets/pdf_file/0025/37762/HW8-HWNP-Composite-Version-Planning.pdf

place on LBE’s Transport Strategy and Place-Shaping Framework. The issues covered by those consultations are crucial to shaping the future of the borough and should have been dealt with before, with the resulting proposals feeding into the Regulation 19 draft ELP.

- 9.6. The full Council meeting to approve the Regulation 19 draft ELP was delayed after our legal counsel highlighted various concerns, including the failure to publish crucial Topic Papers that Councillors reasonably required in order to make an informed decision; some papers were reportedly not even finalised. During the following week dozens of additional documents were released, and the ELP plus supporting evidence now totals 289 documents containing thousands of pages.
- 9.7. However, despite - or perhaps because of - the mass of reports, and contrary to NPPF paragraph 145, the exceptional circumstances for the release of Site RUR.02 from the Green Belt have not been evidenced. The very limited arguments are superficial and fail to meet the necessary threshold:
 - 9.7.1. The Green Belt Exceptional Circumstances Topic Paper (2024) only states that the site is ‘sustainably located’, without providing comments or evidence (see 8.17).
 - 9.7.2. The Site Allocation Topic Paper (2024) mostly comments on a high level housing need and urban capacity, and the brief comments specific to the Site are largely wrong (see 8.19).
 - 9.7.3. The Integrated Impact Assessment ratings actually support retention of the Site in the Green Belt (see Appendix A).
 - 9.7.4. The Growth Topic Paper (2021) comments extensively on Crews Hill and Chase Park, but only mentions the Hadley Wood site once in passing (see 8.14 above).
 - 9.7.5. The Housing Topic Paper (2024) also comments extensively on Crews Hill and Chase Park, including in its conclusion that exceptional circumstances exist, but makes no mention of the Hadley Wood site (see 8.21 above).
 - 9.7.6. The reasons for retention of the Site as part of the Green Belt are compelling (see 8.24).
 - 9.7.7. Development of Site RUR.02 would be contrary to numerous ELP policies (see 8.24.14).
- 9.8. Strategic Policy SS1 Spatial Strategy establishes a minimum new housing requirement of 160 homes for the Hadley Wood Neighbourhood Plan Area.
 - 9.8.1. LBE have acted unreasonably by setting a minimum requirement that entirely relates to, and depends on, the disputed release of Site RUR.02 from the Green Belt for development more than 10 years in the future. The target is therefore driven by capacity, not a requirement. No other evidence or context has been produced to justify this 160 number, and we note that the ELP identifies a supply of 34,710 homes, representing an excess of 1,430 over the 33,280 that are deemed to be ‘required’.

Excluding Site RUR.02 and protected Local Open Space/Local Green Space, the Neighbourhood Plan Area only measures 1.4km² and has a Conservation Area at its centre. In spite of the limited land area, there have been, and continue to be, a number of developments in the area which will provide the 160 homes in Hadley Wood without requiring any Green Belt release.

Since 2019 the following schemes have been built out or approved:

Address	Redevelopment of	New housing
381 Cockfosters Road	1 house	9 apartments
383 Cockfosters Road	1 house	14 apartments

385 Cockfosters Road	1 house	9 apartments
397 Cockfosters Road	1 house	11 apartments
25 Camlet Way	1 house	7 apartments + 2 houses
39A Camlet Way	garden	3 additional houses
56 Camlet Way	1 house	3 houses
90 Camlet Way	1 house	9 apartments + 1 house
19 Beech Hill	garden	2 additional houses
22 Beech Hill	1 house	9 apartments
29 Beech Hill	1 house	2 additional houses
42 Beech Hill	Golf club lodge	2 houses
31 Beech Hill Avenue	1 house	2 houses
15 Parkgate Crescent	1 house	2 houses
37 Lancaster Avenue	1 house	6 apartments
66 Kingwell Road	1 house	2 houses
Net additions since 2019		82 housing units

These developments represent 82 net additions, over half of the 160 that policy SS1 states as the minimum number of new homes for Hadley Wood to be delivered during the 2019-2041 Plan period. Therefore, if there is a need for 160 homes in Hadley Wood these can be delivered without the need for any Green Belt release.

Other issues

- **Issues and proposed modifications unrelated to Site RUR.02.**

10. The above comments relate specifically to Site RUR.02, as residents have expressed grave concerns regarding the development proposal. However, the ELP raises various other issues, many of which were already included in our representation during the Regulation 18 consultation but which have not been addressed.
 - 10.1. Our **proposed modifications** are listed in Appendix A.
 - 10.2. A number of the concerns relating to RUR.02 equally apply to the proposed developments on current Green Belt land at **Chase Park and Crews Hill**.
 - 10.3. A 30,000m² logistics hub is proposed on current Green Belt land near junction 24 of the M25 (site **RUR.04**), close to Hadley Wood. Together with a similar development near junction 25 of the M25 (RUR.05) these developments “*will provide for a significant amount of the borough’s employment needs in the Plan period*”. RUR.04 is in an isolated PTAL 1a location, and workers will inevitably commute by car. Also, being in a far corner of the borough, it will mostly provide employment for residents of the neighbouring borough of Hertsmere, most notably Potters Bar, than LB Enfield. The development proposal is purely driven by a financial motive.
 - 10.4. **Policy H4** of the ELP calls for intensification by way of development of, inter alia, sites within 800m of a station. This is inconsistent with the London Plan (2021) policy H1, which calls for optimization of such areas around stations, as well as on small sites, etc only in respect of brownfield sites. In the absence of justification for the deviation, and the far-reaching impact that Enfield’s much broader policy could have, without the implications having been assessed,

the ELP must be amended so as to be consistent with the London Plan and apply the intensification, including near stations, only to brownfield land.

- 10.5. ELP **paragraph 6.32** is weaker than the NPPF. The ELP states that ‘very special circumstances’ require the applicant to prove *“that the exceptional nature of the proposal outweighs the harm it might have on the Green Belt”*. This is weaker than NPPF paragraph 153, which states that *“‘very special circumstances’ will not exist unless the potential harm to the Green Belt [...] is clearly outweighed by other considerations”* (our underlining). The ELP also does not make it clear whether paragraph 6.33 relates to ‘very special circumstances’ proposals.
- 10.6. Some ELP references to the NPPF are out-of-date. For example, section 2 of policy **BG5** references NPPF paragraph 149, but should read paragraph 154.
- 10.7. Furthermore, to avoid misunderstandings, “and” should be inserted before *“are of high quality design”* in that same section 2 of policy **BG5**.
- 10.8. ELP policy **BG2** must also protect Areas of Special Character, which the updated ELP covers in policy DE11.
- 10.9. ELP policy **BG9** should differentiate based on the designation of the watercourse, e.g. Main River, Ordinary Watercourse, etc.
- 10.10. Policy **BG10** must be strengthened to bring it in line with London Plan policy G7, which states that *“if planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed”*.
- 10.11. Table 7.1 in policy **DE5** should include the views from the A111/Stagg Hill and Wagon Road (Ganwick Farm) as ‘important views’.
- 10.12. Section 7 of policy **DE6** should be enhanced along the lines of London Plan policy D9, which states that *“Proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification demonstrating that alternatives have been explored and that there are clear public benefits that outweigh the harm. The buildings should positively contribute to the character of the area”*.
- 10.13. Section 4.a.iii) of ELP policy **DE15** states that rooflights must be located *“not visible from the highway, with their placement, size and number being considered so as to relate to the style, proportions and arrangement of the lower elevation and the prevailing roofscape of the locality”*. We mirrored this proposed ELP policy in policy HW-12 of the recently adopted Hadley Wood Neighbourhood Plan, however, LBE’s Planning Decisions team have been unwilling to enforce the policy on the basis that rooflights are Permitted Developments. As the Planning Inspectorate have refused appeals for rooflights on front-facing roofslopes the department’s stance is incomprehensible and we would ask for assurance that these rooflight policies will be enforced.
- 10.14. Section 2.a.i) of ELP policy **DE15** uses the term ‘locality’ in *“which is out of character with the locality”*. That term needs to be defined and, similar to the previous point, we would ask for assurance that it will be enforced, as we have found LBE’s Planning Decisions team unwilling to enforce restrictions pursuant to Neighbourhood Plan policies that use terms such as ‘visible immediate locality’. The Planning Decisions team consider the ‘locality’ to comprise the entirety of Hadley Wood. We have, in vain, explained that the interpretation completely undermines the policy as there are precedents for almost any form of development, especially as the Planning Decisions team are also disregarding the Neighbourhood Plan’s policy that requires precedents to have been approved under the same planning framework (a principle that reflects Appeal decisions).

- 10.15. Although **paragraph 1.17** of the ELP states that *“development proposals within the Hadley Wood area will be assessed using the new ELP, as well as the Neighbourhood Plan”*, in light of the implementation issues outlined in the above two points we propose that the following explicit statement is added to paragraph 1.17: *“All the Neighbourhood Plan’s policies are in conformity with the strategic policies of the ELP and continue to apply.”*
- 10.16. The ELP references the LBE’s **Character of Growth Study** (2021) in various places. That document is fundamentally flawed as it states on page 15 that PTALs are noted but overridden, *“to account for inaccuracies within PTAL”*. No evidence is provided and the arbitrary manipulation of results is unacceptable. Also, it uses 400/800m distances ‘as the crow flies’, which does not reflect reality. LB Bexley should serve as an example of a more thoughtful approach, which measures distances following actual footpaths and roads.⁴⁶
- 10.17. ELP paragraph **13.2** states that LBE is committed to meeting the Mayor of London’s Transport Strategy objectives to achieve an 80% more share for active and sustainable travel by 2041. The ELP’s extensive proposals for developments in Green Belt locations with low public transport accessibility – such as RUR.02, RUR.04, Crews Hill and Chase Park – without committed transportation and infrastructure improvements, are contrary to that stated objective.
- 10.18. The ELP **weakens** a range of existing DMD policies to such an extent that the new policies are meaningless. Examples include:
- ELP policy BG6 states that garden developments are allowed if *“the loss of such space can be compensated and the development has overriding planning benefits”*. This vague wording renders the policy worthless.
 - ELP policy DE15 contains similar wording to current DMD 11, but the insertion of the caveat *“where appropriate”* before *“secure a common alignment of rear extensions”* renders the policy worthless.
 - ELP policy BG1 has materially weaker wording than current DMD 78, as it merely requires developments to *“contribute”* to the blue and green network, whereas the current policy states that, for example, developments along wildlife corridors will only be permitted if they protect and enhance the corridor. The new policy similarly weakens nature conservation and ecological enhancements. The term *“contribute”* is so vague as to be worthless.
 - ELP policy BG8 has materially weaker wording than current DMD 80, as it merely says that developments that involve harm to trees will be *“resisted”*, as opposed to the current *“refused”*. The term *“resisted”* is in practice worthless.

Exceptions to policies can always be considered, and wording must be more definitive. The above examples will simply result in policies being ignored in the assessment of planning applications.

Conclusions

11. We do not consider the draft ELP to be legally compliant and sound.

- 11.1. LBE have failed to take into account the extensive representations submitted during the Regulation 18 consultation.

⁴⁶ <https://www.bexley.gov.uk/sites/default/files/2021-05/Spatial-strategy-technical-paper.pdf>

- 11.2. The ELP's methodology used to establish the housing target post-2029 is flawed, as it is based on capacity, i.e. sites put forward for development by their owners, without establishing how many homes are actually needed and without the necessary accompanying infrastructure improvements. Especially for sites that are currently in the Green Belt that approach is deeply troubling.
- 11.3. The Council's approach is not consistent with paragraph 4.1.11 of London Plan.
- 11.4. Not only would Site RUR.02 only produce housing in more than 10 years' time, i.e. beyond the period when reliable housing need numbers are available, but the evidence supporting the proposed release from the Green Belt falls materially short of the required exceptional circumstances, and fails to take account of the site's designations, isolated location and that it is not a sustainable development location. The site should therefore remain in the Green Belt. Similarly, the proposed allocations of Green Belt land in Crews Hill and Chase Park look to be inadequately justified.
- 11.5. LBE have failed to fully assess all available alternative and brownfield sites, and to prioritise development of those before Green Belt land is released and developed.
- 11.6. Section 7 above and Appendix A list a number of broader policy and wording issues that need to be addressed and/or corrected.
- 11.7. To avoid further difficulties in the implementation of the recently adopted Neighbourhood Plan the ELP should explicitly state that the NP's policies align with the ELP and remain valid. Leaving aside site RUR.02, the HWNPF is particularly keen to ensure that the Neighbourhood Plan's policies on front gardens, tree replacement, building height and parking spaces are unaffected.
- 11.8. We wish to participate in the examiner's hearings and may be accompanied or represented by legal counsel.

Appendix A – Proposed Modifications

	Policy / Para	Proposed Modification	Rationale
1	RUR.02	Delete allocation and retain site in the Green Belt.	Housing target methodology is flawed, exceptional circumstances not evidenced, isolated PTAL 1b location, not a sustainable development location, no infrastructure improvements and adverse environmental impacts.
2	RUR.04	Delete allocation and retain site in the Green Belt.	Isolated PTAL 1a location, so workers will commute by car, but A111 already operates at >100% of capacity. Will provide employment to residents from outside the borough.
3	PL10	Delete Chase Park allocation and retain in Green Belt.	Housing target methodology is flawed, exceptional circumstances not evidenced, not a sustainable development location and adverse environmental impacts. Hadley Road and A111 already operate at >100% of capacity.
4	PL11	Delete large part of Crews Hill allocation and retain in Green Belt.	Housing target methodology is flawed, exceptional circumstances not evidenced, not a sustainable development location and adverse environmental impacts.
5	SS1	Reduce the overall housing target for borough. Remove RUR.04, PL10 and PL11.	Housing target methodology is flawed, exceptional circumstances not evidenced, isolated PTAL 1 locations, not sustainable development locations, no infrastructure improvements and adverse environmental impacts.
6	SS1	Remove the 160 minimum housing target for the Hadley Wood Neighbourhood Plan Area. At the very least reduce it a lower number that is appropriately evidenced.	The 160 homes is simply based on the suggestion of the owner of one site, who would not be developing the site themselves. This representation extensively details why the site should not be developed. Based on the lack of supporting evidence the target is inappropriate.
7	H4	Paragraph 2 to apply only to brownfield land.	Current wording is inconsistent with London Plan policy H1.
8	H4	Paragraph 2 to apply only to brownfield sites that are all of: in a PTAL 3-6 zone, <u>and</u> are within 800m of a station, <u>and</u> have good infrastructure.	Current wording does not ensure the development location is sustainable, which breaches NPPF.
9	BG1	Redraft paragraph 1 so that the need to “protect and enhance” applies to all of a) through to k).	Current wording is open to misinterpretation, as sub-clauses use terms such as protect, enhance, contribute, improve, maximise, etc, suggesting different strategies/aims.

10	BG4	Mitigation hierarchy to be detailed.	Current wording (“ <i>avoid, mitigate and compensate</i> ”) leaves it unclear what is required or acceptable, thus giving Planning Officers total discretion to apply the policy as they want.
11	BG5	In paragraph 2, insert “ <i>and</i> ” before “ <i>are of high quality design</i> ”.	To avoid misinterpretation.
12	BG5	References must be updated to reflect the updated NPPF.	For example, paragraph 2 of policy BG5 refers to NPPF 149, which became 153 in the 2023 NPPF update.
13	BG8	In paragraph 1, replace “ <i>resisted</i> ” with “ <i>refused</i> ”.	The term “ <i>resisted</i> ” is in practice worthless. Breaches require valid and appropriate rationale.
14	BG8	In paragraph 3, replace “ <i>unless the loss of such space can be compensated and the development has overriding planning benefits</i> ” with “ <i>unless the loss of such space can be compensated with replacement open land and the development does not adversely affect the amenity of neighbouring properties</i> ”.	Current wording is so vague that it is useless.
15	BG9	Policy must differentiate between differently designated watercourses, e.g. Main Rivers, Ordinary Watercourses, etc.	To ensure commensurate protection.
16	BG10	In paragraphs 4 and 5, replace “ <i>resisted</i> ” with “ <i>refused</i> ”.	The term “ <i>resisted</i> ” is in practice worthless. Breaches require valid and appropriate rationale.
17	BG10	Add: “ <i>If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed</i> ”.	Align ELP with London Plan policy G7.
18	DE5	Add views from A111 / Stagg Hill and from Ganwick Farm on Wagon Road to list of important views to Table 7.1.	Long distance views over London (as far as the City and Canary Wharf) are more spectacular than, for example, view #5 – The Ridgeway.
19	DE6	Add: “ <i>Proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification demonstrating that alternatives have been explored and that there are clear</i> ”.	Align ELP with London Plan policy D9.

		<i>public benefits that outweigh the harm. The buildings should positively contribute to the character of the area</i> ”.	
20	DE10	In paragraph 5, replace “ <i>resisted</i> ” with “ <i>refused</i> ”.	The term “ <i>resisted</i> ” is in practice worthless. Breaches require valid and appropriate rationale.
21	DE11	Add “ <i>protect</i> ” before “ <i>restore, conserve and enhance</i> ”	Ensure Areas of Special Character, referenced in policy DE11, are protected, per NPPF para 180 a).
22	DE15	LBE to confirm that paragraph 4a) iii) of policy DE15, regarding front-facing rooflights, will be enforced.	Similar policy in Hadley Wood Neighbourhood Plan is not being applied, even though appeal refusals evidence that Inspectorate will enforce these types of design policies.
23	DE15	“ <i>Locality</i> ” in paragraph 2a) i) of policy DE15 to be defined as the “ <i>area that is visible from the development location</i> ”.	Planning Officers have interpreted the term “visible immediate locality” in the Hadley Wood Neighbourhood Plan as including dwellings that are not visible from the development location (as evidenced by Google Street View), which undermines the aim of the policy.
24	DE15	Delete “where appropriate” before “ <i>secure a common alignment of rear extensions</i> ”.	Current wording renders the policy worthless.
25	CL5	In paragraph 2, replace “ <i>resisted</i> ” with “ <i>refused</i> ”.	The term “ <i>resisted</i> ” is in practice worthless. Breaches require valid and appropriate rationale.
26	6.32	Insert “ <i>clearly</i> ” before “ <i>outweighs the harm</i> ”.	Current wording is inconsistent with NPPF para 153.
27	3.20, 3.33, 7.43, 7.49, 8.40	All policies that are based on the Character of Growth Study, such as locations deemed suitable for tall buildings, should be reassessed as that document is fundamentally flawed.	The Character of Growth Study is fundamentally flawed as it states on page 15 that the PTALs are noted but overridden “to account for inaccuracies within PTAL”. The statement is provided without evidence and the arbitrary manipulation of results is unacceptable.
28	13.2	LBE cannot claim to be committed to meeting the Mayor of London’s Transport Strategy of achieving an 80% mode share for active and sustainable travel by 2041.	With a quarter of the new housing, as well the logistics hub (RUR.04), to be developed on current Green Belt land, which is in isolated PTAL 1 locations with very limited local amenities and no committed infrastructure development, this target is unachievable.
29	1.17	Add: “ <i>All the Neighbourhood Plan’s policies are in conformity with the strategic policies of the ELP and continue to apply. For ease of reference that has been reiterated in key policies.</i> ”	To ensure that Planning Officers continue to apply all policies of the Hadley Wood Neighbourhood Plan.
30	BG10	Add sidenote: “ <i>In addition, the Hadley Wood Neighbourhood Plan policies, including those on tree</i>	To ensure that Planning Officers continue to apply all policies of the Hadley Wood Neighbourhood Plan.

		<i>replacement and front gardens, continue to apply to the Hadley Wood Neighbourhood Plan Area”.</i>	
31	DE13	<i>Add sidenote: “In addition, the Hadley Wood Neighbourhood Plan policies, including those on tree replacement, front gardens, roofs and apartment developments, continue to apply to the Hadley Wood Neighbourhood Plan Area”.</i>	To ensure that Planning Officers continue to apply all policies of the Hadley Wood Neighbourhood Plan.
32	DE6	<i>Add sidenote: “In addition, the Hadley Wood Neighbourhood Plan policies, including on building height, continue to apply to the Hadley Wood Neighbourhood Plan Area”.</i>	To ensure that Planning Officers continue to apply all policies of the Hadley Wood Neighbourhood Plan.
33	T2	<i>Add sidenote: “In addition, the Hadley Wood Neighbourhood Plan policies, including on parking standards, continue to apply to the Hadley Wood Neighbourhood Plan Area”.</i>	To ensure that Planning Officers continue to apply all policies of the Hadley Wood Neighbourhood Plan.

Appendix B - Integrated Impact Assessment (IIA)

The updated (2023) IIA (https://www.enfield.gov.uk/_data/assets/pdf_file/0026/54197/11450-Enfield-IIA-Main-report-Reg19-Planning.pdf) provides more granular details than the 2021 version, but some of the scores for site RUR.02 appear highly questionable. The table below shows the ratings that the Sustainability Audit report (attached) considers more appropriate, alongside the IIA scores. Brief comments for changes are added, with full information provided in the Sustainability Audit report.

IIA Objective		IIA Score	Audit Score	Comment
1	Climate change mitigation	N/A	--	Very limited local amenities and poor public transport connectivity, exacerbated by centuries old pastureland, which is a carbon sink, being removed.
2	Climate change adaptation	N/A	-	Removal of centuries old grassland in an area known to be prone to flooding.
3	Housing	++	+	The proposed housing does not address the local need identified in the Neighbourhood Plan.
4a	GP surgeries	-	--	There is no GP practice within walking or cycling distance and the HELAA (2021) scored this as "Located some distance from amenities".
4b	Access to recreation	++	+	Recreation facilities are very limited and open air only (fields and tennis courts).
4c	Loss of recreation	--	--	
4	Health & wellbeing	-	-	
5	Services & facilities	+	--	Location is in lowest IMD rank of deprivation for barriers to housing and services in England. Additional residents would exacerbate the problem.
6	Social inclusion	0	0	
7	Crime & community safety	N/A	N/A	
8	Road safety	N/A	-	Active travel is materially hampered, with narrow roads and parked cars, steep inclines, and no pavement in, for example, the western half of Wagon Road (to the north of the site).
9a	Access to employment	-	-	
9b	Safeguarding employment land	0	0	
9c	Employment provision	N/A	-	There is no noteworthy employment in Hadley Wood.
9	Economy	-	-	
10	Town & local centres	+	+	
11a	NO2 pollution	-	-	
11b	PM10 pollution	0	-	Domestic combustion and road transport are significant sources of PM10 pollution.
11c	PM2.5 pollution	-	-	
11	Air pollution	-	--	The site is currently pastureland and is in a car-dependent location (with minimal active travel possibilities and PTAL 1b).
12a	Sustainable transport	--	--	

12b	Services & facilities	++	-	PTAL 1b location, no GP or NHS dentist, no supermarket or leisure centre, an oversubscribed primary school and no secondary school; HELAA (2021) scores this as “Located some distance from amenities”.
12	Sustainable transport	0	--	Active travel is very limited, the location is PTAL 1b and the site is car-dependent.
13a	Biodiversity & geodiversity assets	0	--	Building on centuries old pasture land is a significant negative.
13b	Designated wildlife sites, priority habitats	--	--	
13	Biodiversity	--	--	
14a	Proximity to historic assets - in settlements	N/A	--	The site is in an Archaeological Priority Area and is surrounded by two Conservation Areas and several listed buildings.
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	-	Too highly scored – part of the site is a flood zone 3.
17b	Surface water flood risk	--	--	
17	Flooding	--	--	
18	Water	--	--	

Out of the 39 items being assessed, the Integrated Impact Assessment scored RUR.02 as follows:

Effect		Occurrences	%
--	Significant negative	14	36%
-	Minor negative	7	18%
0	Negligible	6	15%
N/A	Not applicable	6	15%
+	Minor positive	2	5%
++	Significant positive	3	8%

Although we dispute some of the IIA’s scoring as overly generous, even that report rates only 5 out of the 39 items as positive, representing a mere 13% of the total. On the other hand, 54% of the items were rated negatively. Therefore, even the Council’s own assessment naturally leads to the conclusion that the site is not a sustainable development location and must therefore not be removed from the Green Belt for development.

Appendix C – Surface Water Flood Risk

Development of site RUR.02, currently comprising grassland, shrubs and trees, will increase the surface water flood risk to the railway line. The issue is shown below, on a map taken from the Government’s website - <https://www.gov.uk/check-long-term-flood-risk>

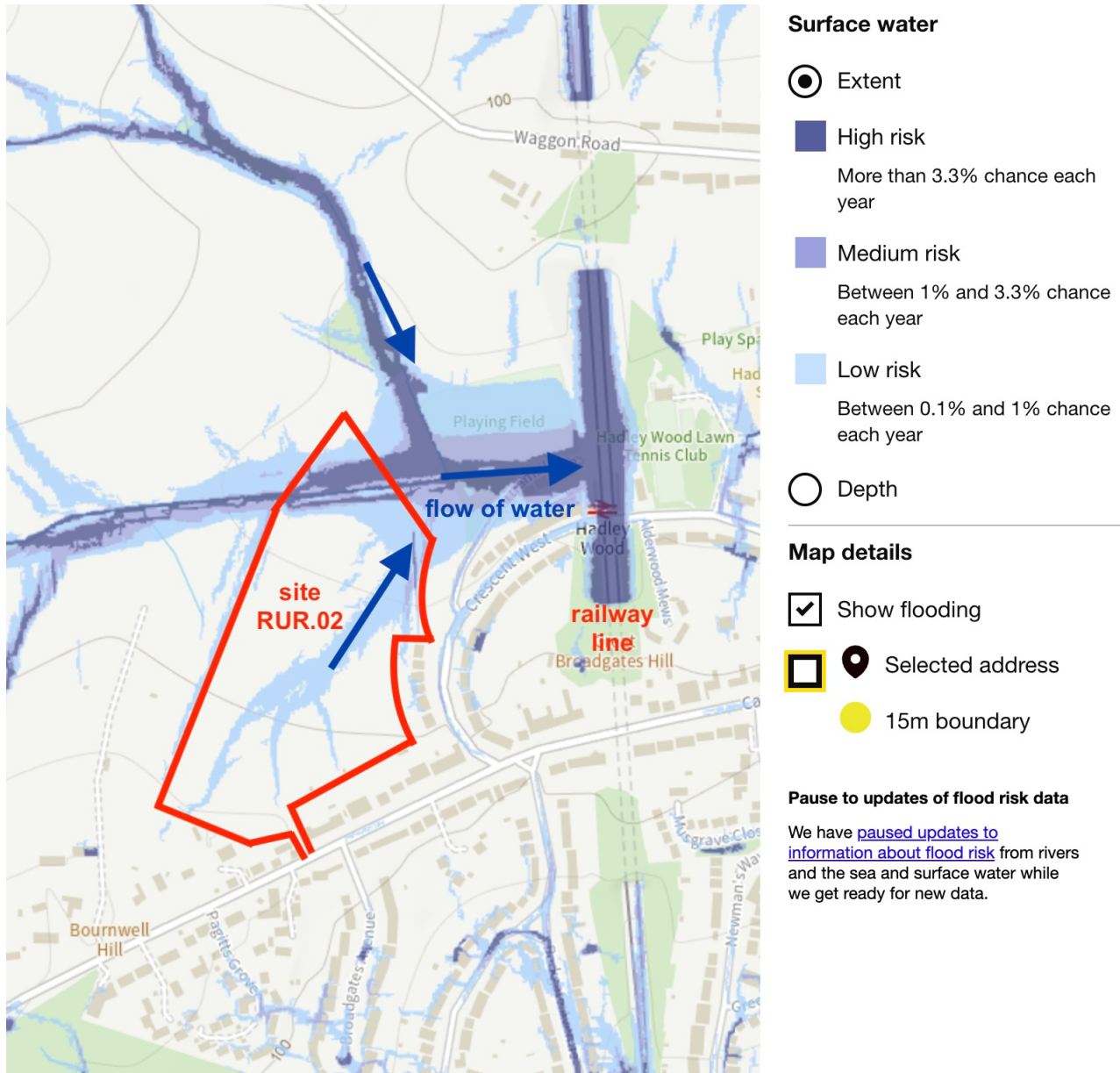


Figure 3: Map showing surface water flood risk (source: UK Government)

Attachments

1. Planning Report by Troy Planning;
2. Landscape & Green Belt Appraisal by Enplan;
3. Heritage Assessment by JB Heritage;
4. Walkability Index by Space Syntax;
5. Sustainability Audit by HWNPF;
6. Hadley Wood Heritage & Character Assessment by Aecom;
7. Hadley Wood Neighbourhood Plan.
8. Regulation 19 Consultation Representation Form