

# Draft Enfield Local Plan 2019-2039

Response by

Hadley Wood Neighbourhood Planning Forum



September 2021

## Contents

	<u>Page</u>
1. Introduction	3
2. Hadley Wood	4
3. Legal & Policy	5
4. Green Belt	14
5. Sustainability	27
6. Environmental	38
7. Heritage	39
8. Amenity / Landscape	49
9. Transport	54
10. Housing	59
11. Other proposed developments on Green Belt land	63
12. Other policy changes	63
13. Conclusions	74
Appendix 1	Planning Report by Troy Planning
Appendix 2	Heritage Assessment by JB Heritage
Appendix 3	Landscape & Green Belt Appraisal by Enplan
Appendix 4	Walkability Index by Space Syntax
Appendix 5	Sustainability Audit by Hadley Property Consultancy
Appendix 6	Hadley Wood Heritage & Character Assessment by Aecom
Appendix 7	Draft Hadley Wood Neighbourhood Plan

## 1. Introduction

The Hadley Wood Neighbourhood Planning Forum (the “Forum”) was set up in 2015 and is an independent body, albeit connected to the Hadley Wood Association via cross committee membership. The Forum was recognised by the London Borough of Enfield through its original designation and redesignation in January 2021 under section 61F of the Town and Country Planning Act 1990, and as such has formal planning status.

After a number of local workshops with residents the draft Neighbourhood Plan was published in February 2019. Following further feedback from the community and a detailed response from Enfield Council, a revised version of the plan was issued in December 2019 and reviewed by a core group of committee members. A comprehensive edit was completed and published on the website in May 2020.

Covid has delayed progress but the Neighbourhood Plan will hopefully be the subject of formal (Regulation 14) community consultation in late 2021. After that the final draft Plan will be submitted to Enfield Council, who will arrange for independent examination. A full referendum of the entire local community to endorse the plan will follow.

The Strategic Objectives of the draft Local Plan are welcomed, as is the focus on place-making areas to help ensure a strategic approach and on fighting climate change. Policies on achieving good design, including of landscape, and on putting heritage at the centre of place-making should help apply those strategic goals. The Planning Forum want to work with the Council to promote sustainable development but it has to be recognised that Hadley Wood is a green and spacious suburb with special character developing around its Conservation Area core and being surrounding by the green belt.

However, **the Forum members are deeply concerned by aspects of the draft Local Plan and object to:**

- **All areas within 800m of stations being identified for intensification, without taking into account local public transport connections and amenities, as this would increase the number of car dependent residents.**
- **The release of the Land behind Camlet Way and Crescent West, Hadley Wood (site allocation “SA45”) from the Green Belt for the development of 160 new homes.**
- **various other aspects of the draft Local Plan (the “Plan”).**

**The key consideration in respect of these issues is that Hadley Wood is not, in the present set up, a sustainable development location. The proposed plan does not demonstrate sustainable growth for Hadley Wood. It will irretrievably damage the fundamental character and positive environmental contribution of Hadley Wood, contrary to the basic principles of the Neighbourhood Plan.**

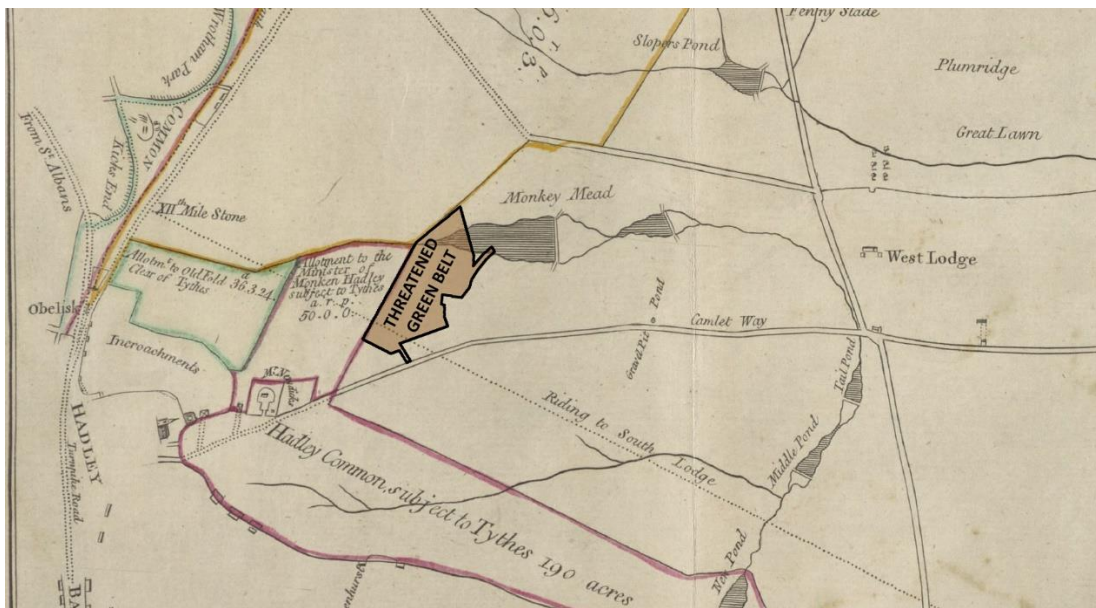
We would encourage Enfield to review the more granular approach to establishing sustainable development locations by, for example, the London Borough of Bexley in their Regulation 19 Local Plan. **The proposed plan development is not sustainable growth. It is unnecessary. It will irretrievably damage the fundamental character and positive environmental contribution of Hadley Wood, contrary to the basic principles of NPF and all good planning policy.**

To support this response, the Forum, in conjunction with the Hadley Wood Association, instructed specialist professional advisors to review the Council’s Local Plan policies and Evidence Base. These

include a Planning Policy appraisal by Troy Planning, Heritage appraisal by JB Heritage, a Landscape and Green Belt appraisal by Enplan, a Walkability Index by Space Syntax, a Sustainability Audit by Hadley Property Consultancy. The reports form part of this response and are attached as Appendices.

## 2. Hadley Wood

- The area in which Hadley Wood resides is part of the historical hunting grounds of Enfield Chase and the fields that make up site SA45 have been owned by the Sovereign since 1399.
- The Act of Disenchantment of 1777 divided Enfield Chase into plots for sale as agricultural leases. In 1885 the Duchy of Lancaster converted the leases around the proposed new railway station of what would become Hadley Wood into building leases, but retained site SA45 as rough pasture – site superimposed on the disenchantment map:-



- Hadley Wood remains characterised by green and open spaces, with Green Belt (in LB Enfield, LB of Barnet and Hertsmere) surrounding the built-up area – the red arrow indicates site SA45:



- The landscape character of this area is recognised in a multitude of documents, including the Hertfordshire Landscape Character Study (Herts County Council), the Enfield Characterisation Study (LB

Enfield) and the Hadley Wood Heritage and Character Assessment (prepared for the Neighbourhood Plan).

- The draft Hadley Wood Neighbourhood Plan, expected to go to consultation late 2021 - having been delayed due to Covid - states that ***“The ‘setting’ of Hadley Wood, surrounded by Green Belt farmland and mature woodlands, is to be treasured and deserves continued protection. The open space within our boundary provides areas for recreation and wildlife. Together they form a major part of local character, play a key role in flood mitigation, and contribute to some of the cleanest air quality in South-East England.”***
- The draft neighbourhood Plan furthermore notes 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.



Figure 18: Flooding in Parkgate Crescent, 2015

### 3. Legal, Process & Policy

#### **Objection: Process was flawed and policy/legal considerations overlooked**

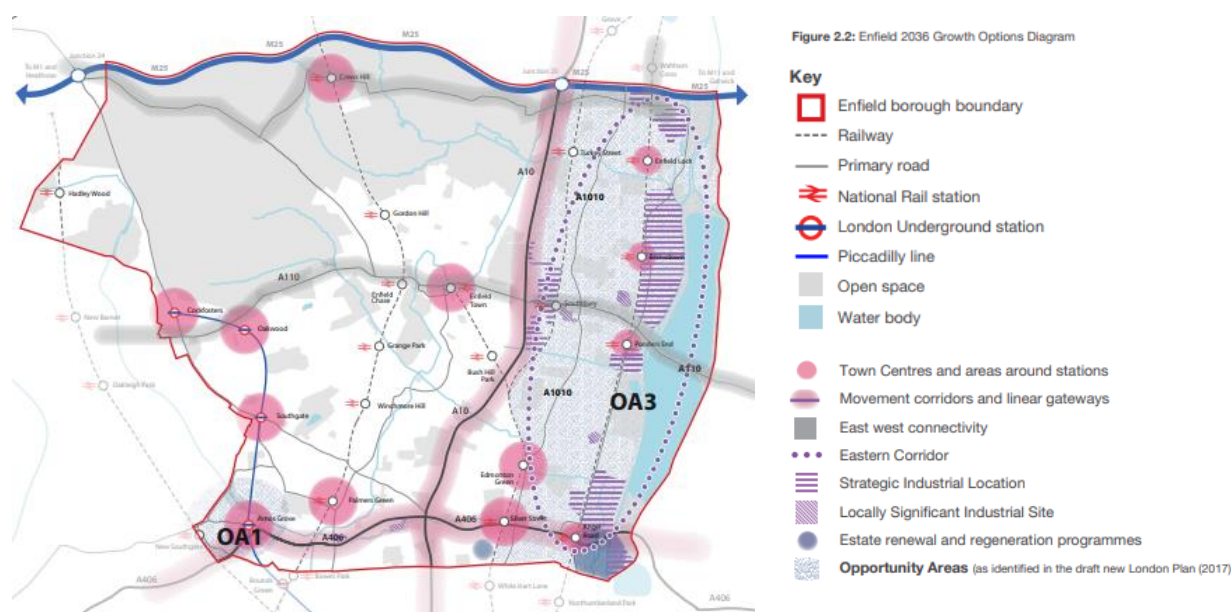
##### **i. Lack of consultation with the Hadley Wood Neighbourhood Planning Forum**

The Hadley Wood Neighbourhood Planning Forum was set up and approved by Enfield Council in 2015 and redesignated in January 2021. Although the draft Local Plan acknowledges the Hadley Wood Neighbourhood Planning Area and the Statement of Community Involvement indicates that “early engagement with relevant groups and organisations will be undertaken”, there has been no consultation with the Forum concerning the Plan, other than one meeting in February 2019 which was in response to the previous Reg 18 “Issues and Options” public consultation.

The December 2018 consultation document did not highlight the area around Hadley Wood station as part of the growth options – see image below. Paras 2.7.2 and 2.8.5 of the document suggested that growth would focus on areas around stations that have at least ‘local shopping centres’ (Hadley Wood only has a ‘local parade’).

The 2018 consultation document also did not indicate that land in Hadley Wood could be released from Green Belt, even though the Duchy of Lancaster claims to have put the site forward two years earlier, in February 2016. At no point did the Council communicate with the Planning Forum regarding Green Belt release.

As part of the Green Belt review for this Local Plan the Council undertook a consultation exercise with a broad range of interested parties as set out in Appendix A of the Green Belt and MOL Study 2021. The omission of the Hadley Wood Neighbourhood Planning Forum from this consultation exercise is a surprising and major oversight. The Council, having commented on the draft Neighbourhood Plan, were fully aware that the release of Green Belt land and housing allocation at site SA45 was contrary to the draft Neighbourhood Plan, which emphasised the need to protect the Green Belt boundaries. The lack of consultation with the Planning Forum on this issue is a major flaw that cannot now be rectified.



**ii. Range of target housing numbers is too wide for actioning**

The plan quotes targets ranging from 1,246dpa to 4,397dpa. Until that number has been fixed, or at least the range has been narrowed, no meaningful strategy can be agreed and there can be no exceptional circumstances for green belt release. Covid and Brexit have had a major impact over the past 18 months. Covid will result in a shift to working from home, which will free up employment sites over the Plan period. Brexit has resulted in a reduction in the number of people from the EU living and working in London, and will continue to do so, which must in turn reduce the estimated population growth in the borough over the Plan period.

**iii. SHLAA/HELAA is considered invalid due to a lack of information**

The SHLAA/HELAA for site SA45 is considered invalid as insufficient viability, suitability and availability information has been provided, and there is therefore no robust justification as to why this site has been selected for development. In addition, the uncertainty regarding the housing requirement raises serious questions as to why this site has been pre-emptively selected for release from the Green Belt.

Further, the SHLAA details “access to local services” under *Site Information* rather than *Suitability*. As a result the access to local services, a key consideration for sustainable developments, is given no weight in Enfield’s site selection (for the Hadley Wood site the HELAA notes: “Located some distance from amenities”).

Also, harm to heritage assets not listed as a consideration for *Suitability* – the Hadley Wood site is surrounded by the Hadley Wood Conservation Area, the Monken Hadley Conservation Area and Grade II listed buildings, and the Plan acknowledges that the site overlaps the Conservation Area and that “large-scale development could adversely affect the setting of these heritage assets” (page 577 - <https://governance.enfield.gov.uk/documents/b22747/Item%203%20-%20Draft%20Regulation%2018%20Enfield%20Local%20Plan%20-%20Appendices%20A%20D%20and%20H%2009th-Jun-2021%2019.00%20Counci.pdf?T=9>).

#### iv. Flawed site selection

- The NPPF requires a strategic approach to planning and para 2.12.3 of Enfield’s 2018 Consultation document reflects this in the comment that “it is essential that there is a planned approach to any question of development of current Green Belt land”.
- Even though the Duchy of Lancaster claims to have put site SA45 forward for development in February 2016, Enfield did not reference the site in the 2018 Consultation document (<https://new.enfield.gov.uk/services/planning/enfield-draft-local-plan-2036-planning.pdf>), nor was it mentioned in the only meeting with the Hadley Wood Neighbourhood Planning Forum (in February 2019).
- The site was only included after the Duchy of Lancaster, as landowner, made its inclusion a condition of its support for the draft Plan. The astonishing submission (pg 15 - <https://new.enfield.gov.uk/services/planning/local-plan-other-consultee-responses-planning.pdf>) concludes with the statement that: “The Duchy supports the review of Green Belt boundaries provided it considers land around all stations and smaller site options, such as land at Hadley Wood station, as a reasonable alternative to Crews Hill”.
- The Duchy’s statement that developments such as the proposed 160 homes in Hadley Wood could provide “a reasonable alternative” to the 3,000 homes proposed in Crews Hill is clearly nonsensical. The input makes other wildly inaccurate statements - for example, it implies that Hadley Wood has adequate “schools, jobs and retail opportunities” with no evidence to justify such assertions, that it would be an “infill or rounding off”, and that Hadley Wood would be able to provide affordable homes and sustainable development.
- The draft Local Plan’s supporting documents suggest anything but a strategic approach with respect to the site. For example, the SHLAA/HELAA suggests the site is “Located some distance from amenities”, the Green Belt and MOL Study assesses the Harm of Releasing the site as “Very High” (table 8.1 of Green Belt and MOL Study 2021) and the site assessment provided to the Councillors to approve the draft Plan for public consultation states that that “large-scale development could adversely affect the setting of [the adjoining] heritage assets”.
- The insistence on inclusion of the Hadley Wood site is a disingenuous move by the Duchy of Lancaster to facilitate release of Green Belt land it owns (at Hadley Wood) rather than land it does not own (at Crews Hill). The inclusion of the site, however flawed, suited Enfield Council, as it reduced pressure on the Council to include land within its ownership for development.

- The updated Plan includes the Hadley Wood site but fails to evidence what alternatives were considered to the release from the Green Belt of the site. The Inspector’s Examination of the East Herts Local Plan makes it clear that justification must be provided for each site, and notes that East Herts Council’s Review was at a strategic level - so as to justify large parcels as a whole - with its applicability to small sites adjacent to urban areas being debatable. Enfield has made that same mistake. ([https://www.welhat.gov.uk/media/12878/EX39-Green-Belt-review-note-December-2017/pdf/ED39\\_Green\\_Belt\\_review\\_note\\_Dec\\_2017.pdf?m=636489409149570000](https://www.welhat.gov.uk/media/12878/EX39-Green-Belt-review-note-December-2017/pdf/ED39_Green_Belt_review_note_Dec_2017.pdf?m=636489409149570000))

**v. Failure to consider all possible sites**

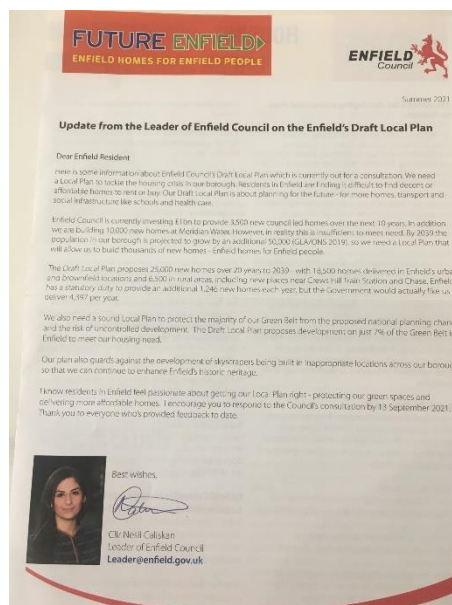
- Enfield have failed to comply with policy H1 of the London Plan by not adequately assessing the development potential from alternative supply sources, such as car parks, low density retail parks and supermarkets, under-utilised Strategic Industrial Land (SIL) sites, surplus utilities and public sector owned sites and industrial sites.
- Enfield’s Capacity Study Site Identification omitted publicly owned sites that were in alternative uses, breaching London Plan policy H1 and NPPF paragraph 120d).
- That same Capacity Study failed to assess the potential housing supply from industrial sites classified as “wider areas of search”, i.e. sites that are not in the development pipeline. This breaches the Mayor of London’s Draft Module A of the Good Quality Homes for all Londoners Guidance, which promotes the intensification and co-location of uses, as well as the Mayor of London’s Draft Industrial Intensification Primer, which states that consideration must be given as to “how industrial areas can be used more intensively and how industry can be integrated in residential areas”. The Council refused to consider or assess SIL sites (which might be suitable for mixed use development) and instead opted for easier Green Belt sites.
- Contrary to NPPF paragraph 141(c), no Statement of Common Ground between Enfield and neighbouring authorities has been submitted.

**vi. Lack of settlements hierarchy**

- The NPPF requires that development takes place outside the Green Belt development as much as possible:
  - Para 137 – The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
  - Para 140 – Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.
  - Para 142 – 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” A) makes as much use as possible of suitable brownfield sites and underutilised land; B) optimises the density of development... ; and C) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.



- Para 142 – When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account [...]. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well served by public transport.
- It is accepted that Enfield has a housing need, although the 20% increase is highly debatable as Enfield’s own projections only expect a 10% increase in population between 2015 and 2032 (<https://new.enfield.gov.uk/healthandwellbeing/wp-content/uploads/2017/03/Enfield-People.pdf>). The new census data due out shortly should be used to form the basis of the housing need and targets for the next 20 years. It should also be noted that Brexit and Covid have led to a decrease in London’s population over the past year.
- The courts have held that the simple existence of a housing need does not in itself amount to the “exceptional circumstances” referred to in the NPPF. In spite of this, the Plan does not evidence, as required under NPPF para 141, that all other reasonable options have been examined. For example, only half of the 10,000 projected homes at Meridian Water have been included in the 20 year Plan, even though that project has been in the works for over 10 years. A leaflet (see below) on the draft Local Plan from the leader of the Council in Summer 2021 implied there will be 10,000 new homes built at Meridian Water, which we agree is realistic but not what the draft Local Plan contains – it only allocates 5,000 new homes there in the Plan period.



- Furthermore, a study by CPRE London and Enfield Roadwatch, “Space to Build, Enfield” (Jan 2019), identified a significant number of brownfield sites for development, very few of which appear to have been incorporated into the Local Plan. ([https://www.london.gov.uk/sites/default/files/ad\\_84\\_space\\_to\\_build\\_enfield\\_report\\_final.pdf](https://www.london.gov.uk/sites/default/files/ad_84_space_to_build_enfield_report_final.pdf))
- Additionally, whilst the NPPF does not explicitly require that a sequential approach be applied, in *Compton Parish Council v Guildford Borough Council* (2019) the High Court indicated that a sequential assessment of sites is a reasonable approach when deciding whether the requisite exceptional circumstances for Green Belt release exist.

- In October 2020 Richard Langham QC, opined in the matter of the emerging Welwyn Hatfield Local Plan that, where the justification of the release of a Green Belt site is simply the need to provide housing, the Inspector was well within his or her rights to insist on evidence that there are no preferable alternatives to the sites to be proposed to be released from the Green Belt. ([https://www.welhat.gov.uk/media/17455/1029778-Save-Symondshyde-Matter-3-Appendix-1-Legal-Opinion-.pdf/1029778\\_Save\\_Symondshyde\\_Matter\\_3\\_Appendix\\_1\\_Legal\\_Opinion\\_.pdf?m=637400375824330000](https://www.welhat.gov.uk/media/17455/1029778-Save-Symondshyde-Matter-3-Appendix-1-Legal-Opinion-.pdf/1029778_Save_Symondshyde_Matter_3_Appendix_1_Legal_Opinion_.pdf?m=637400375824330000))
- NPPF para 175 states that “plans should [...] allocate land with the least environmental or amenity value”. Enfield’s Local Plan makes no reference to this important guidance.
- Policy H1 of the London Plan (Increasing housing supply) lists sites that should be considered to meet the housing targets. This does not include Green Belt sites but instead requires boroughs to focus on, for example:
  - ❖ Encouraging development on additional windfall sites;
  - ❖ Optimising potential development on brownfield sites;
- An increasing number of Local Plans incorporate an explicit hierarchy of sustainability of settlements. Rutland have included the following helpful table (<https://www.rutland.gov.uk/resources/assets/attachment/full/0/95690.pdf>):

<b>NPPF</b>	<b>Service or Facility Indicator Used</b>
NPPF Paragraph 103 (Promoting Sustainable Transport) <i>Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.</i>	<ul style="list-style-type: none"> <li>• Public Transport Provision</li> </ul>
NPPF Paragraph 92 (Promoting Healthy and Safe Communities)  <i>To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</i>	<ul style="list-style-type: none"> <li>• General Store</li> <li>• Community facility</li> <li>• Public House</li> </ul>
<ul style="list-style-type: none"> <li>- <i>plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open spaces, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</i></li> <li>- <i>ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.</i></li> </ul>	<ul style="list-style-type: none"> <li>• Employment Opportunities</li> </ul>
NPPF Paragraph 94 (Promoting Healthy and Safe Communities)  <i>It is important that a sufficient choice of school places is available to meet the needs of existing and new communities.</i>	<ul style="list-style-type: none"> <li>• Primary School</li> <li>• Secondary School</li> </ul>

<p>NPPF Paragraph 96 (Promoting Healthy and Safe Communities)</p> <p><i>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.</i></p>	<ul style="list-style-type: none"> <li>• Sports Recreation Ground</li> <li>• Children's Play Area</li> </ul>
<p>NPPF Paragraph 8 (Achieving Sustainable Development)</p> <p><i>Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</i></p>	<ul style="list-style-type: none"> <li>• General Medical Facility</li> <li>• Library</li> <li>• Post Office</li> </ul>
<p><i>- a social role – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;</i></p>	

- Sevenoaks use the following:

<u>Criteria Used</u>	<u>Justification</u>
<b>The population of a settlement</b>	The given population of a settlement is a good indication of its size. This can then be used proportionally against the other criteria to determine the position of a settlement in the hierarchy.
<b>The range of facilities and services available in the settlement for the community to meet its day-to-day requirements</b>	The range of facilities and services available in each settlement given an indication to how sustainable a settlement is. It also gives an indication as to whether some settlements depend on other settlements to provide facilities and services for its residents.
<b>The settlement's access to education</b>	Access to education is considered as a key service for a settlement and the local community. Access to education encompasses all forms of education provision (i.e. primary, secondary, higher education such as colleges).
<b>The settlement's access to health services</b>	Access to health services is an important service within a community. Therefore, this is identified as a facility that contributes to a sustainable settlement.
<b>The settlement's connectivity and access to public transport</b>	It is important that that a settlement is connected by public transport and other allows greater choice/opportunities for residents to travel. Therefore, public transport and connectivity with surrounding settlements is important when looking at sustainability.

- Hadley Wood would score low under the above parameters.

- Enfield’s 2018 Consultation Document noted that residents had expressed the view that brownfield sites should be exhausted before Green Belt land was released (<https://new.enfield.gov.uk/services/planning/enfield-draft-local-plan-2036-planning.pdf>) :
- In spite of this the Enfield Local Plan does not appear to be using any form of prioritisation, and Green Belt sites with very limited amenities may therefore be developed before, for example, brownfield sites near town centres are considered. That approach is deeply flawed and contrary to the views expressed by Enfield residents.



**vii. Exceptional circumstances are not assessed per site.**

Enfield uses housing shortage as a catch all justification for the Green Belt land releases and appears to have made the same mistake as East Herts. The Inspector’s Examination of the East Herts Local Plan makes it clear that justification must be provided for each site, and notes that East Herts Council’s Review was at a strategic level - so as to justify large parcels as a whole - with its applicability to small sites adjacent to urban areas being debatable.

([https://www.welhat.gov.uk/media/12878/EX39-Green-Belt-review-note-December-2017/pdf/ED39\\_Green\\_Belt\\_review\\_note\\_Dec\\_2017.pdf?m=636489409149570000](https://www.welhat.gov.uk/media/12878/EX39-Green-Belt-review-note-December-2017/pdf/ED39_Green_Belt_review_note_Dec_2017.pdf?m=636489409149570000))

**viii. Inconsistencies with London Plan**

The draft Enfield Local Plan has some inconsistencies with the 2021 London Plan. For example:

- Pg 15 of the Character & Growth Report states that PTALs are deemed to be inaccurate and all areas near stations are treated as the equivalent of PTAL 4 or higher. Enfield’s arbitrary approach contradicts the London Plan and has a material impact on Hadley Wood, which is in a PTAL 1a/b zone (<https://new.enfield.gov.uk/services/planning/character-of-growth-report-stages1.2.3a-planning.pdf>) :

Factor	Method	Assessment + Assumptions
PTAL and planned improvements	<p>Overlay of latest TfL PTAL data and GIS analysis.</p> <p>Check where a typology is within 800m (a ten minute walk) of a station.</p>	<p>The following values are assigned (Ptal 0-1= low, 2-3 = medium, 4-6b = high)</p> <p>Where a urban typology is within 10 minutes or directly adjacent to the a station the force of change will be High regardless of PTAL - this is to account for inaccuracies within PTAL and irregularities where highly connected places are not represented (Meridian Water station and surrounds).</p>

- Enfield’s Policy DM BG 8 protection of trees of landscape and biodiversity value is materially weaker than the London Plan Policy G7, which protects all trees by stating 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”.
- Enfield’s Policy DM DE6 requires that proposals involving tall buildings must not harm the significance of heritage assets, including their settings and protected views. London Plan policy D9 states that additionally that: “proposals resulting in harm require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh the harm”. The requirement to prove that alternatives have been explored provides important additional protection.

**ix. Omission of Areas of Special Character designation**

Current policy DMD84 restricts development in Areas of Special Character and requires that features or characteristics which are key to maintaining the quality of the area must be preserved and enhanced.

The draft Local Plan is silent on Areas of Special Character, presumably because both the Hadley Wood and Chase Park sites have that designation and their release from the Green Belt – to allow development - would be indefensible.

NPPF para 174 states, inter alia, that “planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes [... ] recognising the intrinsic character and beauty of the countryside”.

NPPF para 101 states that “the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them”.

The Areas of Special Character designation, or an equivalent, must be retained and the protections afforded to the spaces must continue.

**x. Failure of Duty to Co-Operate and lack of coordination with neighbouring local authorities**

The Evidence Base does not indicate that the Council has complied with the Duty to Co-Operate.

Furthermore, site SA45 is bordered by both the LB Barnet and Hertsmere Borough. Aside from the lack of statement of common ground, referred to above, the 2017 Green Belt Assessment for Hertsmere applied a wider-than-district approach and considered the site that includes SA45 to make a “Strong” contribution to the Green Belt and therefore recommended that the land should not be considered further for development.

Furthermore, Hadley Wood residents rely for most of the amenities on services provided by local authorities other than Enfield – examples in: schools (Barnet), GP (Hertsmere), hospital (Barnet), dentists (Barnet), library (Barnet), gym/leisure centre (Barnet). There is no evidence to indicate that Enfield have consulted the neighbouring local authorities whose services would be used to establish capacity and impact on residents of those boroughs.

Barnet Council are probably not even aware that by allocating Site SA45, Enfield Council are seeking to utilise Barnet’s key public services and amenities for future Enfield residents, so they won’t have to provide them themselves. This is not our definition of sustainable development.

#### 4. Green Belt

**Objection: Adversely impacts valuable and valued landscape**

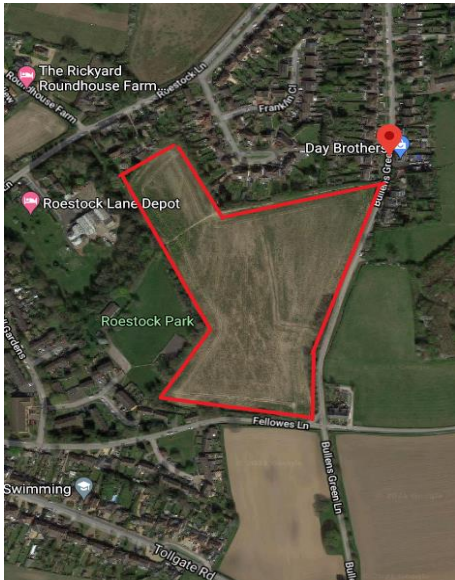
**Objection: Hadley Wood Green Belt is flawed site selection**

- The Plan suggests the removal of 11ha of land between Camlet Way and Crescent West (site SA45) from the Green Belt to allow construction of 160 new homes:



- Troy Planning have, on behalf of the Forum and HWA, undertaken a detailed assessment of the Green Belt policies contained in the draft Local Plan and have raised a number of concerns which are set out in their report, attached in Appendix 1.
- Development on former Green Belt land is impacted by various policies and regulations, including:
  - The Plan calls for 50% of the homes to be affordable housing (half social rented and half intermediate tenure);
  - Development proposals must:
    - maintain the local distinctiveness as per the area's Characterisation Study;
    - enhance wildlife and biodiversity (or follow the mitigation per the London Plan);
    - be set back at least 8 metres from watercourses;
    - conserve and enhance the significance of heritage assets (incl. conservation areas);
  - Developments adjacent to the Green Belt must not have a detrimental impact on the visual amenity or open character of the Green Belt, and must retain and enhance existing features of landscape, through tree-planting, etc.
  - Para 137 of the NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl and by keeping land permanently open". Land can be released, but only if there are exceptional circumstances. The desire to protect the Green Belt is further reflected in the London Plan, and the Mayor of London has publicly denounced Enfield's proposals.

- Development has been previously allowed on Green Belt land to meet housing need, such as at Bullens Green Lane, Colney Heath – Welwyn Hatfield (left below). However, that plot was largely an “infill”, surrounded by existing housing, whereas the Hadley Wood site (right below) only has existing development on one side, and would thus encroach open Green Belt land.



**i. Destroys part of the Green Belt**



- Although there is generally a presumption in favour of development in planning, for Green Belt land the presumption is reversed and the onus is on the Council to prove that exceptional circumstances exist to de-designate and permit development.
- Removal of land from the Green Belt goes against the stated objective of the Mayor of London and many local, regional and national policies. Recent Local Plan examinations, such as that for Cheshire East, have suggested that a *sequential approach*, whereby Green Belt land is only used after other sources have been exploited, should be used (<https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Local-plan-examination-2018/APP22-Report-on-the-Examination-of-the-Cheshire-East-Local-Plan-Strategy-DPD.pdf>).

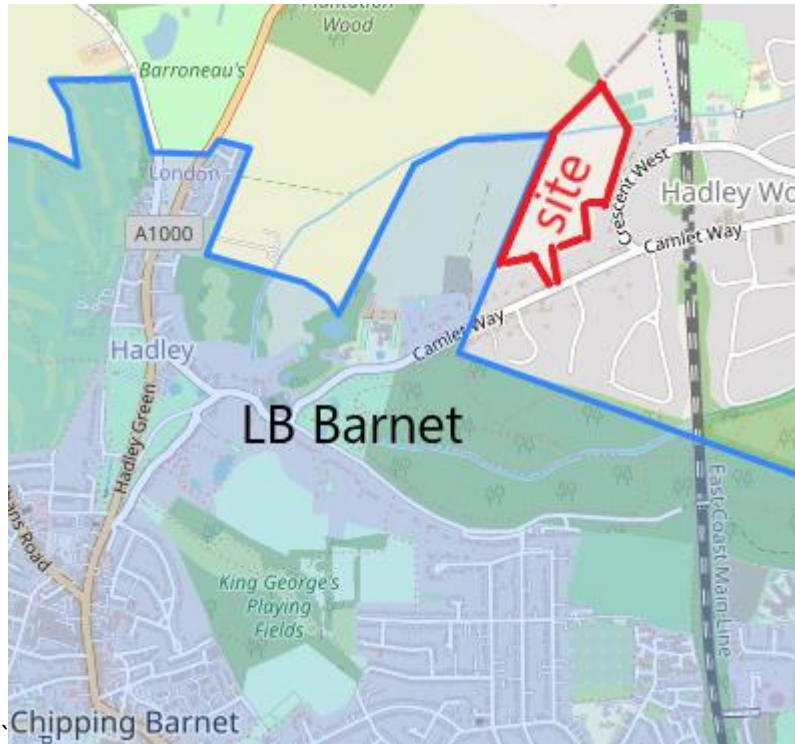
- Enfield declared a Climate Emergency in 2019 and subsequently introduced an Action Plan. Its vision states: “By 2030, we will have a natural environment that enhances biodiversity, provides significant protection against flooding and which helps to mitigate overheating in London. By 2040 we will have achieved a net increase in green infrastructure of 25% compared to today” and “The Greenbelt will play an enhanced role in biodiversity, carbon off-setting and in helping facilitate low-carbon living”.
- The Local Plan contains Strategic Objectives around three key aims: A nurturing place, a deeply green place and the workshop of London. The lack of a settlements hierarchy, and allowing Green Belt land to be built on before brownfield sites have been used, is fundamentally incompatible with the key aim of creating ‘A Green Place’.
- The NPPF stresses that *permanence* is a key feature of the Green Belt. The fields making up site SA45 have been unchanged for centuries, and the Plan does not evidence a need to develop them for housing.
- The Enfield Characterisation Study (2011, <https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf>) refers to the Farmland Ridge and Valleys as follows:
  - *“This is a very attractive undulating agricultural landscape;*
  - *It is an important area of high quality open landscape with a special character which is highly valued;*
  - *The area of this landscape extends from Hadley Wood...;*
  - *Long views from the north towards the urban edge of the borough;*
  - ***The Farmland Valleys and Ridges landscape type is the borough’s most important landscape type and forms a special area of landscape character which is a major asset for the borough. It is of both landscape and historic significance;***
  - *The designation of the area as Green Belt has meant that the landscape has been well protected from 20th century built development;*
  - *The designation, protection and promotion of areas within this landscape type as part of a ‘Special Landscape Area’ should be considered; [note: this was subsequently approved]*
  - ***The existing Green Belt boundary should be retained and protected, and future development and land use changes resisted.”***
- The *Green Belt and MOL Assessment* concludes in respect of the Hadley Wood site that the Harm of Releasing Whole Assessment Area is “Very High” (table 8.1) ([https://new.enfield.gov.uk/services/planning/green-belt-and-mol-assessment\\_final-report-luc-2021-planning.pdf](https://new.enfield.gov.uk/services/planning/green-belt-and-mol-assessment_final-report-luc-2021-planning.pdf)).

## ii. Contribution to purposes and openness of Green Belt

- The NPPF notes that the Green Belt serves five purposes: checking urban sprawl, preventing neighbouring towns merging, safeguarding the countryside from encroachment, preserving the setting and special character of historic towns and assisting in urban regeneration.



- Enfield's Green Belt and MOL Study indicates that the Hadley Wood site attained "Strong" contribution scores for four of the five purposes (the highest score possible). The only purpose on which it scored "Moderate" was Purpose 2 – preventing neighbouring towns from merging into one another. However, the supporting comments only refer to Potters Bar, whereas the site largely borders the borough of Barnet, and this purpose should be assessed against that built up area, not Potters Bar:-

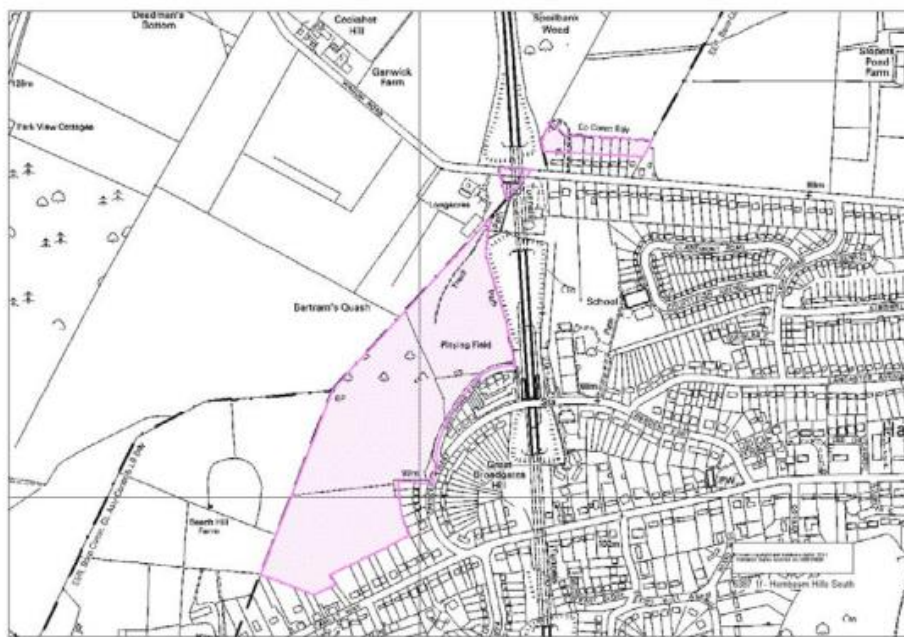


- New Strategic Policy SP DE1 states that developments must be design-led and decisions will be based on Characterisation Studies. Enfield's Characterisation Study (2011) explicitly refers to the fields as: "Although a small area within the borough, this landscape character area is part of an important area of Green Belt and is in good condition. The Green Belt area is clearly defined by Bartram's Lane and the rear boundaries of properties on Camlet Way, Crescent West." - <https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-5-6-february-2011.pdf>
- The proposed development site was added to the Hornbeam Hills South Area of Special Character following Enfield's 2012 review, with the Evidence Base stating - <https://new.enfield.gov.uk/services/planning/planning-policy-information-area-of-special-character-boundary-review.pdf>.

4.26 The Hornbeam Hills South Character area is the south eastern corner of a larger landscape character area identified in the Landscape Character Assessment for Southern Hertfordshire (HCC,2000) The area has a strong undulating arable landscape with a geometric pattern of large fields. This area is similar to the wider area to the west and is an attractive landscape of agricultural land with long distance views to the woods of Wrotham Park to the west. The character area is part of a larger area of significant Green Belt which separates Potters Bar from Hadley Wood.

**4.27 Protected Characteristic traits:** Sloping valley landforms | Geometric field pattern | Mainline railway in cutting/tunnel | Potters Bar and M25 to North West | Limited rights of way.

4.28 Map of Hornbeam Hills South ASOC – subject to consultation through the Draft DMD (May-August 2012)



- Enfield's policy DMD 84 states that "new development within the Areas of Special Character will only be permitted if features or characteristics which are key to maintaining the quality of the area are preserved and enhanced" and explains that Areas of Special Character "are important for their historic landscape character and rural character".
- The draft Local Plan does not have a section equivalent to said DMD84, presumably to allow the release of, and development on, the Green Belt land in Hadley Wood and Chase Park without having to undertake any landscape assessments. However, NPPF para 101 states that the designation of Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them, and NPPF para 174 states, inter alia, that "planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes ... , recognising the intrinsic character and beauty of the countryside". The Areas of Special Character must be therefore reinstated in the new Local Plan.
- Plan Policy DM RE1 states that development adjoining or within close proximity to the Green Belt will only be permitted where, amongst others, "views and vistas" from the Green Belt into

urban areas and vice versa ... are maintained". The 2018 Hadley Wood Heritage and Character Assessment for the Neighbourhood Plan

([http://www.hadleywood.org.uk/uploads/1/4/5/7/14571008/hadley\\_wood\\_heritage\\_character\\_assessment\\_2018.pdf](http://www.hadleywood.org.uk/uploads/1/4/5/7/14571008/hadley_wood_heritage_character_assessment_2018.pdf)) stated that the site provides "important views" from the Conservation Area:

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



An important view from the conservation area by the entrance to Bartrams Lane over the neighbouring fields

- The same Heritage and Character Assessment notes that: *"There are positive aspects of character which should be sustained, reinforced or enhanced. These include:*
  - ❖ *Views with a verdant backdrop are visible across the area, particularly from the higher ground along Camlet Way and the roads descending into the valleys of Monken Mead and Green Brook to the north, east and south.*
  - ❖ *Surrounding landscape with semi-natural, or agricultural character which acts as a buffer separating Hadley Wood from other urban areas."*
- Enfield Characterisation Study (2011, <https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf>) states that lessons to be learned from past mistakes include, inter alia:
  - ❖ *"Recognising the high landscape quality and historic value of the borough's Green Belt, and the local and regional significance of the rural areas of the borough and the importance of preserving a clear interface with adjoining urban neighbourhoods; The need to protect and enhance the borough's landscape and ensure against the risk of poor land management practices and their resulting impact on local character.*
  - ❖ *Adopting policies which will address the issues of biodiversity and climate change adaptation affecting the built form of the borough.*
  - ❖ *The importance of protecting the urban-rural fringe and immediate interface in order to support high quality gateways into and out of the borough, and avoid the detrimental impact of creeping development at the edges of the urban area."*
- The June 2021 Green Belt and MOL Assessment refers to the Hadley Wood Conservation Area appraisal noting the "attractive breaks occur in the street frontage on the north side of the Crescent West, where houses give way to open country, with views out to the northwest of hills and woods". The Assessment admits in para 3.34 that "The Conservation Area Appraisals make no reference to the importance of the Green Belt to the setting and special character of the

designations; however, the inclusion of portions of the Green Belt within designations suggests that the openness of the Green Belt has some historic value in these locations”.

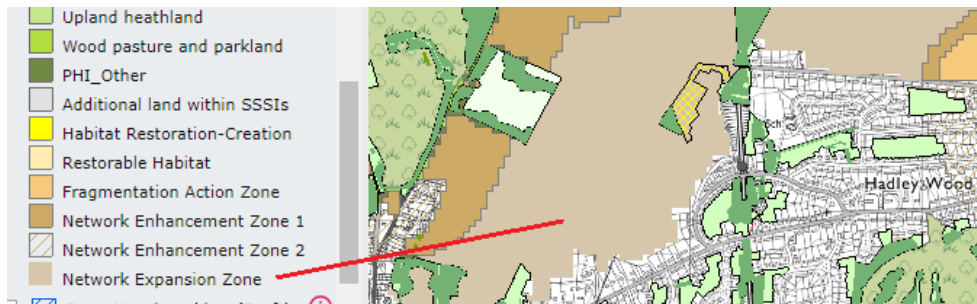
- Openness of the Green Belt is a major consideration in both planning appeals and Local Plans.
  - The Inspector’s examination of the North East Derbyshire Local Plan removed some sites because of the adverse effect on the openness of the Green Belt - <https://www.dronfieldcivicsociety.org.uk/wp-content/uploads/2019/03/Press-release-DCS-DGBRG-1.0.pdf>
  - In respect of planning appeal APP/Z3830/W/20/3256072 the Inspector concluded that the development of 55 dwellings on undeveloped land used for horses would diminish the level of openness that provides an attractive setting for the village of Hartwell – left below. The situation is very similar to the proposal in Hadley Wood – right below:



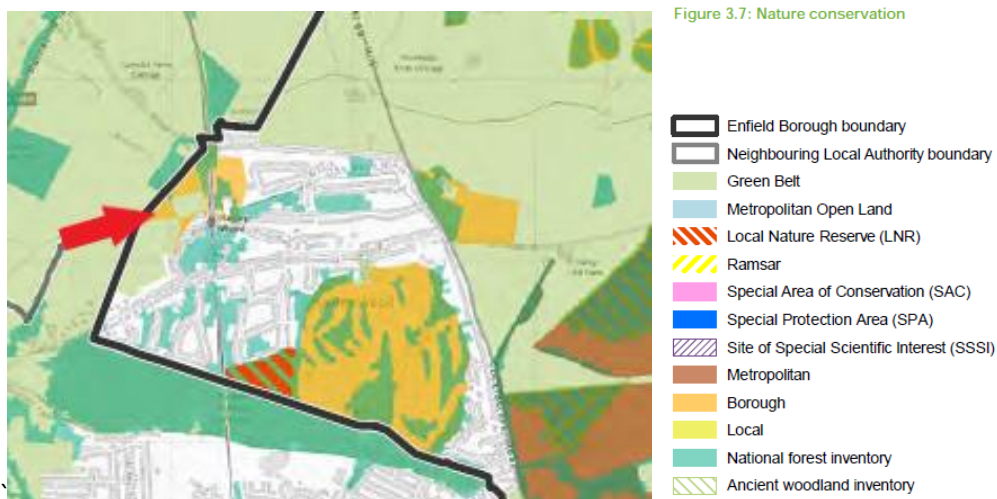
### iii. Impacts biodiversity and wildlife

- The Government’s 2011 Natural Environment White Paper outlined the objective as: “to be the first generation to leave the natural environment in a better state than it inherited”. It led to the establishment of the Natural Capital Committee, whose 2015 report called for the creation of 250,000 hectares of woodland and 100,000 hectares of wetland close to urban areas, and the Government’s 25 year Environment Plan.
- The NPPF builds on the foregoing by including an environmental objective: “to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change”.
- NPPF para 174 states that “plans should [...] allocate land with the least environmental or amenity value”. Enfield’s Local Plan makes no reference to this important guidance.
- The Local Plan contains various policies that aim to protect wildlife and biodiversity:
  - SP SS2 – development proposals must enhance wildlife and biodiversity, and actively include opportunities for nature recovery;
  - SP BG1 – the borough’s habitat and wildlife resources must be protected and enhanced;

- SP BG3 – measures will be sought to increase or improve biodiversity;
  - SP BG4 – development within or adjacent to the Green Belt should not have a significant detrimental impact on its openness and respect the character of its surroundings.
- Defra’s maps indicate that the site is a Network Expansion Zone, i.e. suitable for habitat creation, as well as home to grey partridges and lapwings.



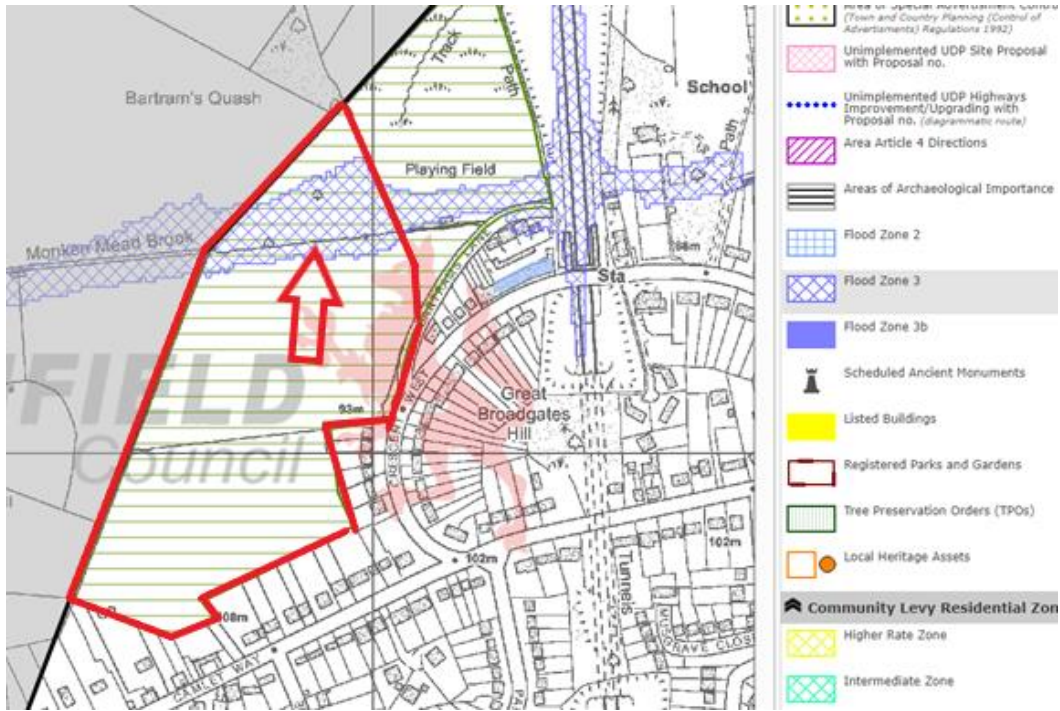
- The Council’s June 2021 Green Belt and MOL Assessment recognises that the Hadley Wood fields are a Nature Conservation site of Borough importance, and the proposed development of these sites is therefore surprising:



- Building on Green Belt land has been proven to be an inefficient use of land because of relatively low density (14dpa vs 31 for urban), and the destruction of habitats and biodiversity should only be contemplated if no other solution is available; the Local Plan fails to evidence that the release of Green Belt land is unavoidable.

**iv. Increases flood risk**

- The Plan contains misleading information. Page 364, which details the proposal for the Hadley Wood Green Belt land, indicates that it is in a Flood Zone 1. However, the HELAA correctly notes that 20% of the site is in Flood Zone 3, as reflected on Enfield Planning’s interactive map, which shows a sizeable area around Monken Mead Brook as Flood Zone 3:



- The top field is therefore unsuitable for housing and lacks rationale for removal from the Green Belt. The middle field is also partly Flood Zone 3, and is covered by Policy DM SE8 which, per the standard Environment Agency requirement, stipulates that developments must be set back a minimum 8 metres from watercourses (Monken Mead Brook is a designated 'Main River').
- Flood risk has already increased substantially in Hadley Wood, due to sewers and flood drains not having been enhanced in line with incremental housing development – between 2000 and 2018 the number of housing units increased by 35% without any investment in upgrading sewers and drains. This has resulted in pavements and roads being flooded by overflowing sewers and drains when it rains:





- Flooding is recognised as a substantial risk in the area and the Enfield Chase Restoration Project aims to plant 100,000 trees to help fight climate change and flooding. It is indefensible that the Council spends significant amounts of tax-payers’ money on planting trees while at the same time releasing nearby parts of the Green Belt for development.

**v. Site merits continued Green Belt protection**

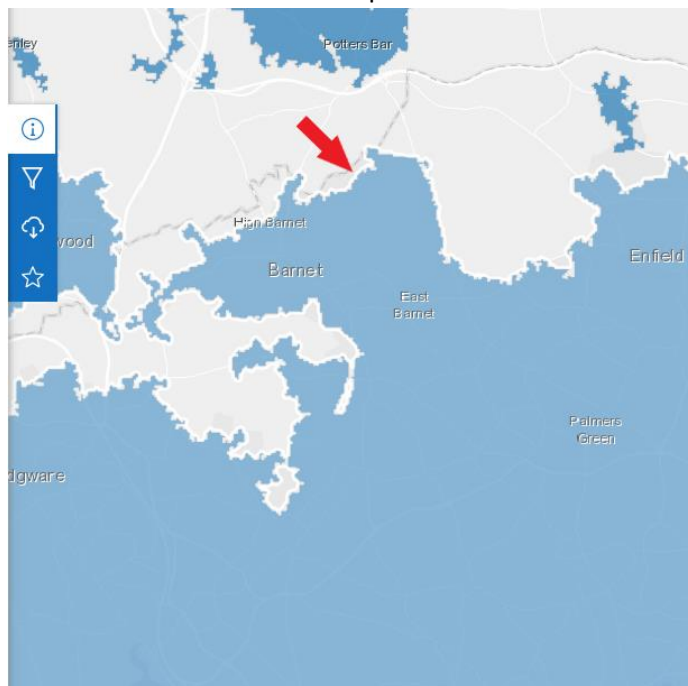
- Para 137 of the NPPF states that: “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.
- The *Enfield Characterisation Study* refers to a “very attractive undulating agricultural landscape”, “an important area of high quality open landscape with a special character which is highly valued”, “long views from the north towards the urban edge of the borough”, “The general layout was established following the 1800 and 1801 enclosure acts... most of this historic field pattern remains intact today”.
- As noted in the Green Belt and MOL Assessment, the Inspector’s interim findings of Durham City Council’s Local Plan clarified that assessment against Green Belt purposes should form the basis of any justification for releasing land from the Green Belt.
- The Green Belt and MOL Study produced for LB Enfield confirms that the Hadley Wood site is open, being formed of agricultural fields, and performs very well against the key purposes of the Green Belt:

Purpose	Score *	Green Belt and MOL Study Comments
Prevent sprawl	<b>Strong</b> (highest possible score)	Adjacent to the large built-up area of Greater London. The site is open, being formed of agricultural fields, and there is strong distinction between the site and the urban area.
Prevent neighbouring towns merging into one another	Moderate	The site is peripheral to a gap between Greater London and Potters Bar to the north. It is open, formed of agricultural fields and there is strong distinction between the site and the urban area.
Assist in safeguarding the countryside from encroachment	<b>Strong</b> (highest possible score)	The site is formed of open fields and so is countryside and there is strong distinction between the site and the urban area.
Preserve the setting and special character of historic towns	<b>Strong</b> (highest possible score)	The site lies directly adjacent to the Hadley Wood Conservation Area, which is contiguous with, and therefore forms part of, historic London. The CA Appraisal notes “attractive breaks occur in the street frontage on the north side of Crescent West, where houses give way to open country, with views out to the northwest of hills and woods”. The fields can be viewed from the conservation area.
Assist in urban regeneration	<b>Strong</b> (highest possible score)	All Green Belt land is considered to make an equally strong contribution to this purpose.

\* Scores per Green Belt and MOL Study prepared for LB Enfield.

➤ Preventing sprawl

The *Office for National Statistics* map of built-up areas shows that the Hadley Wood site is on the edge of the Greater London built up area:



The proposed development site is not an ‘infill’; it would be part of contiguous urban growth, pushing the built-up area beyond the current building line into the countryside:



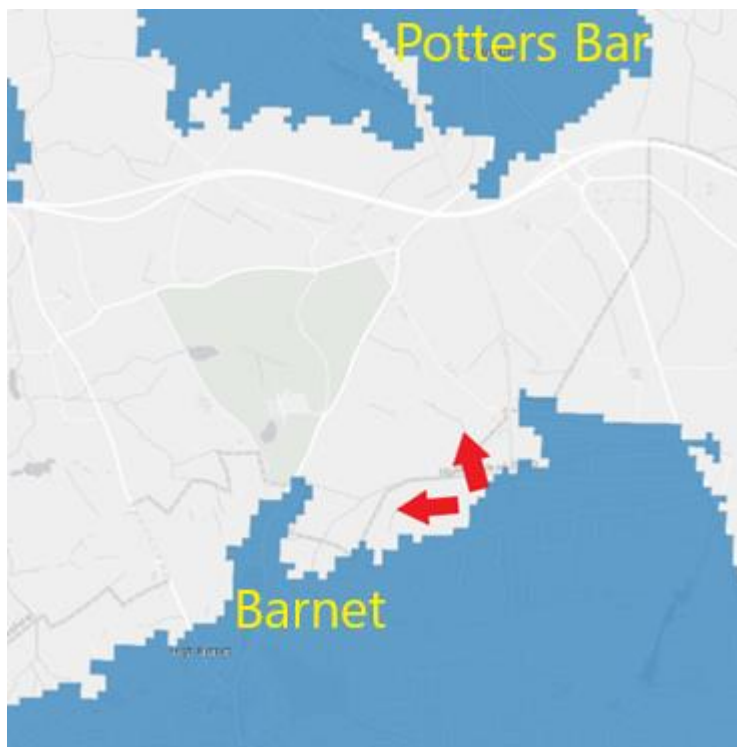


Being immediately adjacent to the built-up area amplifies the role that this land plays in the first purpose of the Green Belt.

➤ Prevent neighbouring towns merging into one another

The Green Belt and MOL Study that supports the Local Plan rates site SA45's contribution to preventing neighbouring towns merging into one another as "moderate", compared with "strong" for the other four purposes.

The surprising result reflects that the comments only consider Potters Bar, whereas the greater risk is merging with the built-up area of Barnet, where the borough boundary adjoins site SA45:



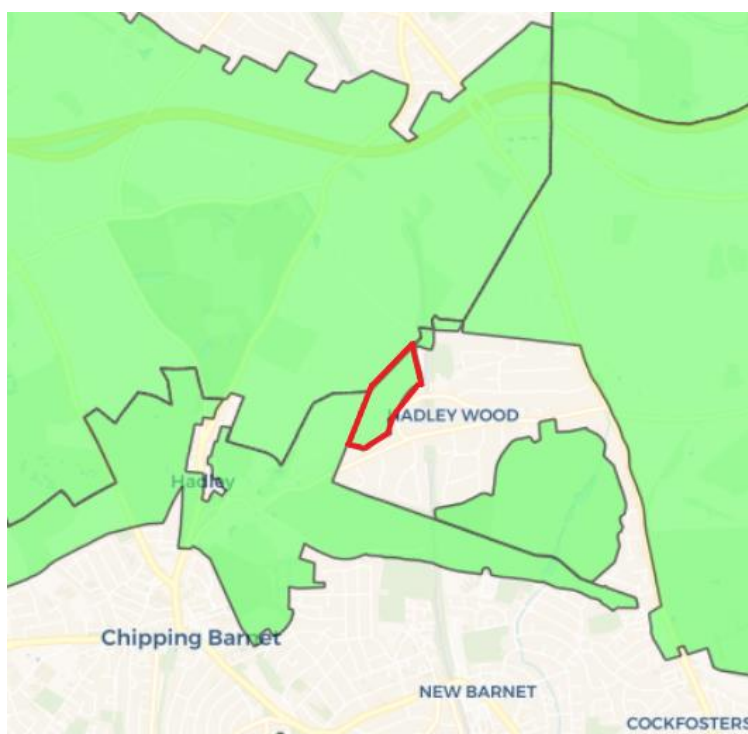
*Office for National Statistics*

Site SA45 is bordered by both the boroughs of Barnet and Hertsmere.

The Stage 1 Green Belt Assessment for Hertsmere applied a wider-than-district approach and considered the area that includes the Hadley Wood site to make a “Strong” contribution to the Green Belt. It therefore recommended that the Hadley Wood site and the land to the west should not be considered further for development.

LUC, the Council’s consultant who produced the Green Belt and MOL Study, undertook a similar study for the London Borough of Barnet for their Local Plan in November 2018. This is highly relevant as the Monken Hadley Conservation Area Appraisal highlights that the field boundaries bordering the site are long established, and therefore any development within the bounds of site allocation SA45 could cause substantial harm to the character and landscape value of the Monken Hadley Conservation Area. This again highlights that site SA45 is part of a valued landscape which should be assessed in the context of its wider setting.

The *Heritage and Character Assessment (2018)* (Appendix 6) notes that the “surrounding landscape with semi-natural or agricultural character acts as a buffer separating Hadley Wood from other urban areas” and a “self-contained village surrounded by Green Belt, isolated within the rural landscape despite proximity to substantial urban areas, namely Barnet, Cockfosters and Potters Bar”.



➤ Assist in safeguarding the countryside from encroachment

The ONS map of built-up areas further above shows that the proposed development site is on the fringe of the urban area, with various documents highlighting that the Green Belt boundaries are clearly defined. *Enfield’s Places Characterisation Study (2011)* explicitly mentions the fields:

“Although a small area within the borough, this landscape character area is part of an important area of Green Belt and is in good condition. The Green Belt area is clearly defined by Bartram’s Lane and the rear boundaries of properties on Camlet Way, Crescent West.”

The *Characterisation Study* furthermore states that “The designation of the area as Green Belt has meant that the landscape has been well protected from 20<sup>th</sup> century built development” and **“The existing Green Belt boundary should be retained and protected, and future development and land use changes resisted.”**

- The requirement for Green Belt developments to provide 50% affordable housing, which by definition comprises higher density and lower cost builds, conflicts with SP BG5, which requires the siting, scale, height and bulk of developments adjacent to the Green Belt to be compatible with the primary aim of preserving the openness of the Green Belt, with high standards of design and landscaping etc. DM RE2 also requires that these developments must not have a detrimental impact on the visual amenity and landscape of the Green Belt, maintain view to the Green Belt from urban areas, and improve the character of the Green Belt and landscape through tree-planting etc. Financial viability will in practice result in these design requirements being watered down, to the detriment of the Green Belt.
- The development would also breach proposed Strategic Policy DE1, which requires developments to be well-designed places that, inter alia, “create viable places that respond to local needs”.

## 5. Sustainability

### **Objection: Wrong location for sustainable development**

### **Objection: Not Good Growth**

#### **i. Good Growth / NPPF**

- The Local Plan notes that ‘*Good Growth*’ is based on six objectives:
  - Building strong and inclusive communities;
  - Making the best use of land, accommodate growth while protecting the Green Belt;
  - Creating a healthy city, which is determined by the environment;
  - Provide a range of high quality, well-designed and accessible homes;
  - Growing a good economy;
  - Limit the impact on climate change.
- The Plan’s lack of a clearly defined settlements hierarchy tied to the above objectives, which would allow a more targeted plan to produce sustainable developments, is a material oversight.
- Paragraph 141 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”.

- The July 2021 NPPF update clarified, in para 11, that all plans should promote a sustainable pattern of development that seeks to:

- i. *Meet the development needs of their area;*

Hadley Wood has an elderly population and needs downsizing opportunities and sheltered accommodation for existing residents, as well as homes for children who grew up here. We are told by developers that, to be financially attractive, the requirement to have 50% affordable housing (half social rented and half intermediate), will result in the remainder of the development to be luxury dwellings, as have been built elsewhere in Hadley Wood. The housing will therefore not address an unmet local need - similar to the refused planning appeal in Blisworth, detailed further below.

- ii. *Align growth and infrastructure;*

- Enfield's HELAA notes under the heading *Access to local services* that the Hadley Wood site is "Located some distance from amenities".
    - Public transport links are poor, as reflected in the site's a PTAL 1a/b. The only bus route (399) travels from Hadley Wood station to Barnet, 2.3km away; there is no tube station; train services are limited, especially off-peak, with the next stop north being Potters Bar (Hertsmere) and the next stop south being New Barnet (LB Barnet). There is no train service to Enfield or Cockfosters.
    - There are no easy walking routes – the only town centre reachable by foot is Barnet, which is a 40 minutes' walk from Hadley Wood station. Enfield town centre would be a 2 hour walk.
    - A Walkability Index study prepared by Space Syntax (attached in Appendix 4) shows that Hadley Wood obtained an average score of 7.8, which is significantly below the average scores of 24 for Enfield and 60 for London.
    - Cycling is unrealistic because of the dangerous roads, gradients and lack of any cycle route alongside roadways.
    - A Sustainability Audit prepared by Hadley Property Consultancy (attached in Appendix 5) shows the following:
      - a. There are no walkable early year facilities for children aged under 2 in Hadley Wood. The nearest facility is a private facility in Monken Hadley.
      - b. Based on GLA data, the development would increase demand for early years schooling by 61 spaces, which significantly exceeds the 10 spaces available "locally" (including LB Barnet) according to the 2017-18 Ofsted reports.
      - c. The single entry form local Hadley Wood primary school is already oversubscribed - 33 children were refused a place for the 2021 start and in 2020 the school had 50 children on a waiting list across the different year groups.
      - d. There are no secondary schools within walkable distance. The nearest non-religious co-educational comprehensive school is East Barnet School, 4.4km away (in LB Barnet) and which already had a deficit of 71 spaces.
      - e. There are no sixth form colleges within walking distance of Hadley Wood.

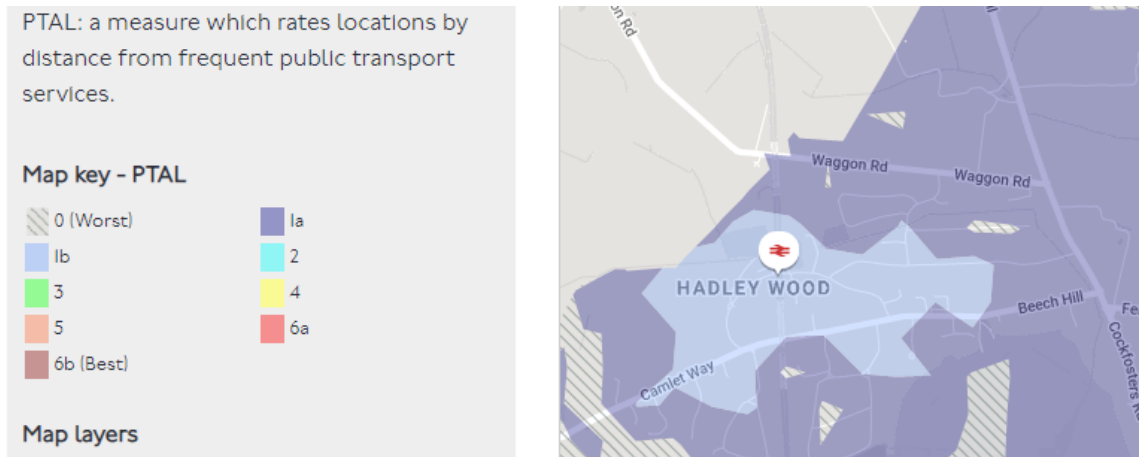
- f. There are no GP facilities within walkable distance. The nearest GP's are outside LB Enfield (Barnet and Potters Bar), who already operate below the recommended GP to patients benchmark.
  - g. The nearest hospital, in Barnet, is an hour's journey away on public transport, and was rated as requiring improvement particularly in the areas of safety and responsiveness.
  - h. There are no NHS dental practices within walkable distance. The three closest practices are all in Barnet.
  - i. There are no libraries within walkable distance. The nearest library is a 40 minute walk away, in Barnet.
  - j. There are no police stations near Hadley Wood. The police station serving Hadley Wood is in Edmonton, 11.4km away.
  - k. There are no gyms within walkable distance (nearest is in Barnet).
  - l. There is one local small convenience store, but no supermarket.
  - m. There is no post office, bank or pub within walkable distance (nearest is in Barnet).
- There is virtually no local employment and only 19% of journeys to work in Outer London are by national rail; the railway station is therefore of very limited use (<https://www.gov.uk/government/statistical-data-sets/tsgb01-modal-comparisons>).
  - Hadley Wood already experiences frequent flooding as sewers and drains have not been updated in line with the increase in housing and significant investment is required.
- iii. *Improve the environment;*
- Building on Green Belt land is almost inevitable harmful to the environment, and to do so before all brownfield sites have been used is irresponsible and unacceptable.
- iv. *Mitigate climate change and adapt to its effects.*
- The development would exacerbate climate change as car use is unavoidable in the relatively isolated location, and the destruction of the grassland eradicates a carbon sequestration resource.
- In light of the above it is unclear how the Housing Topic Paper can conclude that the "Site is located in the Greenbelt, but is in a highly sustainable location". The paper does not elaborate, and the HELAA notes under the heading Access to local services that the Hadley Wood site is "Located some distance from amenities". The Integrated Impact Assessment (IIA) also does not suggest such a conclusion – see below (<https://new.enfield.gov.uk/services/planning/integrated-impact-assessment-2021-planning.pdf>).
  - The Sustainability Audit (Appendix 5) prepared in support of this submission reviewed the Council's assessment scores in the IIA, and suggested a stronger negative outcome:-

Objective	Enfield Integrated Impact Assessment Score	Sustainability Audit Review
IIA1: Climate Change Mitigation	Negligible Effect	Significant Negative
IIA2: Climate Change Adaptation	Negligible Effect	Minor Negative
IIA3: Housing	Significant Positive	Significant Positive
IIA4: Health and Wellbeing	Minor Positive and Minor Negative	Minor Positive and Minor Negative
IIA5: Services and Facilities	Minor Positive	Significant Negative
IIA6: Social Inclusion	Negligible Effect	Negligible Effect
IIA7: Crime and Community Safety	Negligible Effect	Negligible Effect
IIA8: Road Safety	Negligible Effect	Minor Negative
IIA9: Economy	Minor Negative	Minor Negative
IIA10: Town and Local Centres	Minor Positive	Minor Positive
IIA11: Air Pollution	Minor Negative	Minor Negative
IIA12: Sustainable Transport	Significant Positive and Significant Negative	Significant Negative
IIA13: Biodiversity	Significant Negative	Significant Negative
IIA14: Historical Environment	Minor Negative	Significant Negative
IIA15: Landscape and Townscape	Uncertain Significant Negative	Significant Negative
IIA16: Efficient use of Land and Materials	Uncertain Significant Negative	Significant Negative
IIA17: Flooding	Minor Negative	Minor Negative
II18: Water	Uncertain Significant Negative	Significant Negative

ii. **Site SA45**

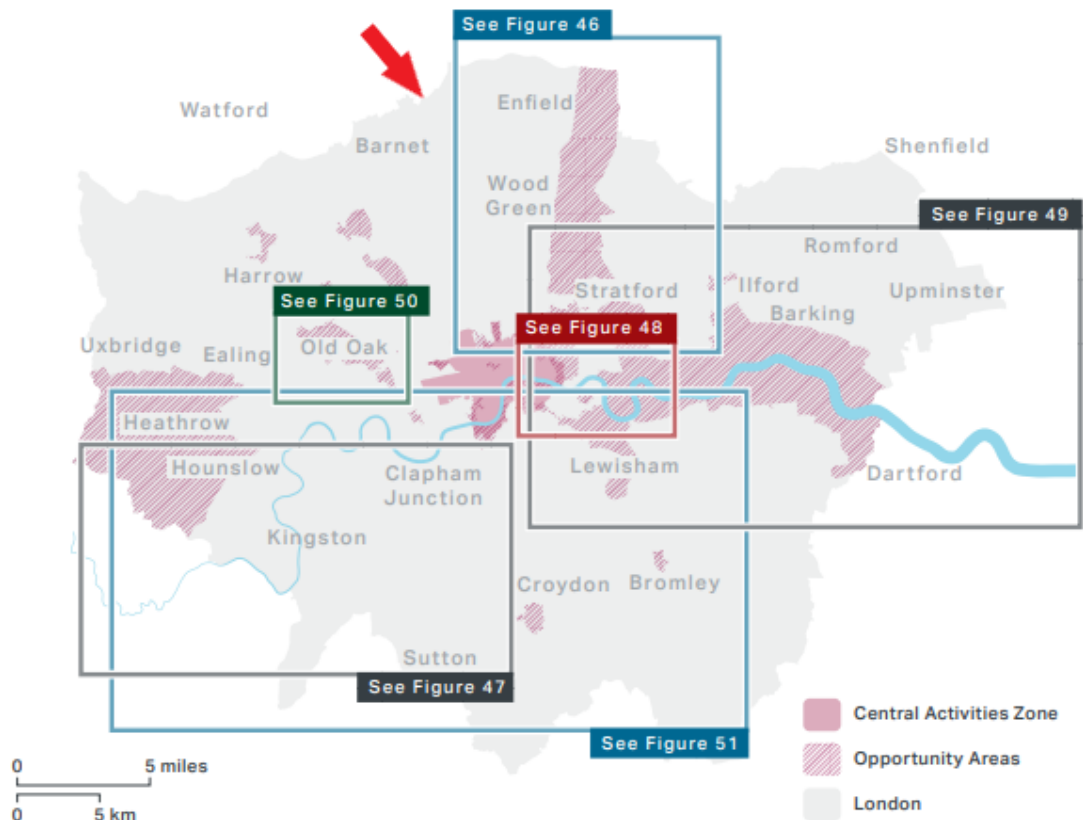
- The actual outcome of the IIA assessment for the 18 outcomes should have been:
  - 7 x Significant Negative scores
  - 5 x Minor Negative scores
  - 1 x Minor positive and minor negative score
  - 3 x Negligible impact scores
  - 1 x Minor positive score
  - 1 x significant positive score
- This highlights that the proposed major development at site SA45, without a commensurate investment in improvement in amenities such as public transport, healthcare, schooling, shopping and leisure, does not represent sustainable development.
- The Local Plan, and the London Plan, have taken an overly simplistic approach, focusing exclusively on the existence of a railway station. The assumption that the proximity to the

railway station equates to good public transport accessibility fails to recognise the reality of suburban/semi-rural locations. In the case of Hadley Wood, trains only run north-south, with infrequent services, especially off-peak and at weekends (with no service to Enfield Town or Cockfosters). Other public transport services are extremely limited, as reflected in the PTAL:



- Hadley Wood was chosen for growth as viability was supported by the arbitrary discounting of PTALs, as outlined in the Character of Growth report. Page 15 of the report states that “where a urban [sic] typology is within 10 minutes or directly adjacent to a station the force of change will be High, regardless of PTAL – this is to account for inaccuracies within PTAL”. No evidence backing up this astonishing claim is provided, and the approach is contrary to the London Plan, which uses the PTALs as published.
- Strategic Policy SP T1 states that new developments will be required to be car-free, however, that is wholly unrealistic in a PTAL 1a/b location. The current level of infrastructure cannot cope with the addition of 160 new homes and the scheme would not warrant the level of investment needed to make a difference. The London Mayor’s Transport Strategy shows that Hadley Wood is not earmarked for improvement (site SA45 marked) <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>:-

**FIGURE 45: 'FOCUS AREAS': WHERE TRANSPORT IS THE ENABLER OF SIGNIFICANT CHANGE TO AN AREA**



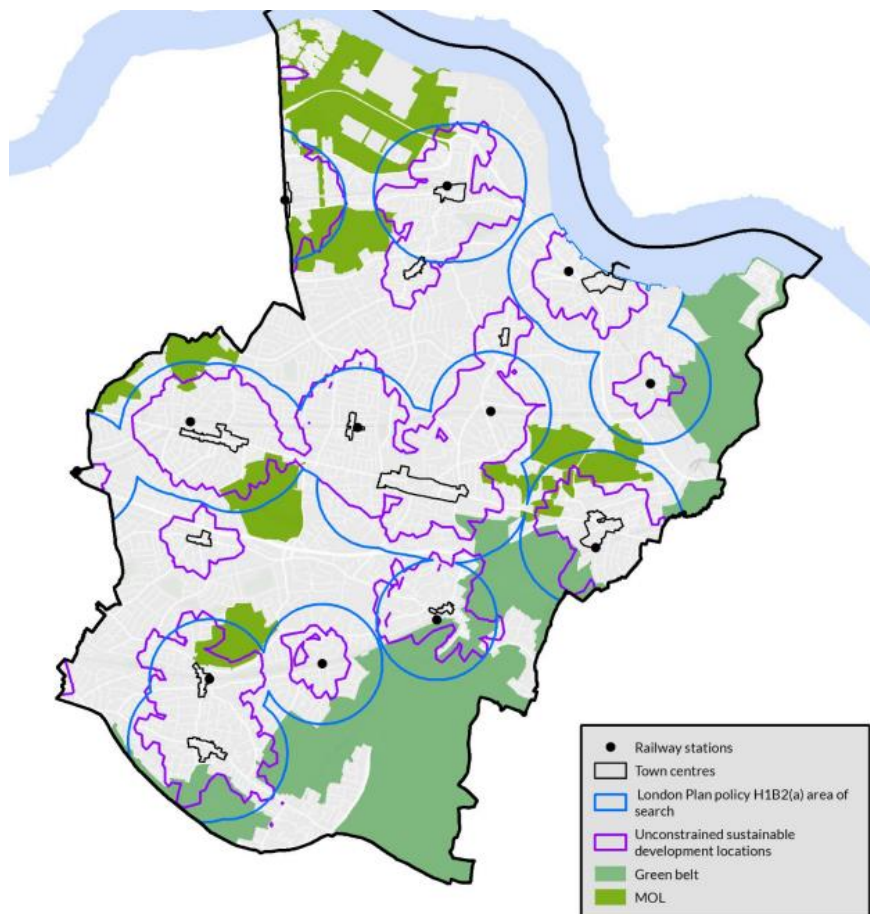
- A 2019 report by The Countryside Charity suggests that, during 2015 to 2019, affordable housing accounted for only 13% of housing completed on greenfield land removed from the Green Belt ([https://www.cpre.org.uk/wp-content/uploads/2019/11/Space\\_to\\_Breathe.pdf](https://www.cpre.org.uk/wp-content/uploads/2019/11/Space_to_Breathe.pdf)). It furthermore highlights that “housing development in the Green Belt is just 14 dwellings per hectare, far below that needed to support sustainable communities” and a significantly less efficient land use than the 31 affordable dwellings per hectare outside the Green Belt. The 160 units proposed for the 11.05ha site in Hadley Wood equates to 14.5 dwellings per hectare, which aligns with the aforementioned density finding.

### iii. Intensification near stations

- Hadley Wood not being a sustainable development location impacts not only the proposed large development on current Green Belt land, but also the proposed intensification elsewhere in Hadley Wood.
- Policy DM H4 states that housing delivery and intensification on small sites will be particularly supported in the following locations:
  - Sites with good public transport accessibility (PTAL 3-6);
  - Sites within 800m of a station or a town centre;
  - Sites with good local infrastructure; and
  - Places with planned infrastructure improvements.



- The above reflects the London Plan. However, that wording was not updated to reflect the consultations and discussions, which revolved around good public transport accessibility and within 800m of a station and good local infrastructure.
- The oversight has resulted in a nonsensical situation, where proximity to a station is in itself deemed sufficient to allow intensification and development, even when there is only a train station that does not provide good local public transport accessibility and the absence of good local infrastructure renders a location unsuitable for sustainable development.
- We strongly encourage Enfield to follow the example set by, for example, the London Borough of Bexley. Their thoughtful approach to establishing sustainable development locations comprises (<https://www.bexley.gov.uk/sites/default/files/2021-05/Spatial-strategy-technical-paper.pdf>):
  - The starting point is London Plan Policies D1 and H1, which focuses small site developments on areas within 800m of a station or town centre, or that are in PTAL 3-6;
  - As pavements and paths do not follow straight lines the (blue) 800m circles are replaced with (purple) 10 minute actual walking distances; where there are only 'local shopping areas' the max walking distance is reduced to 400m;
  - Green Belt/MOL land is excluded;

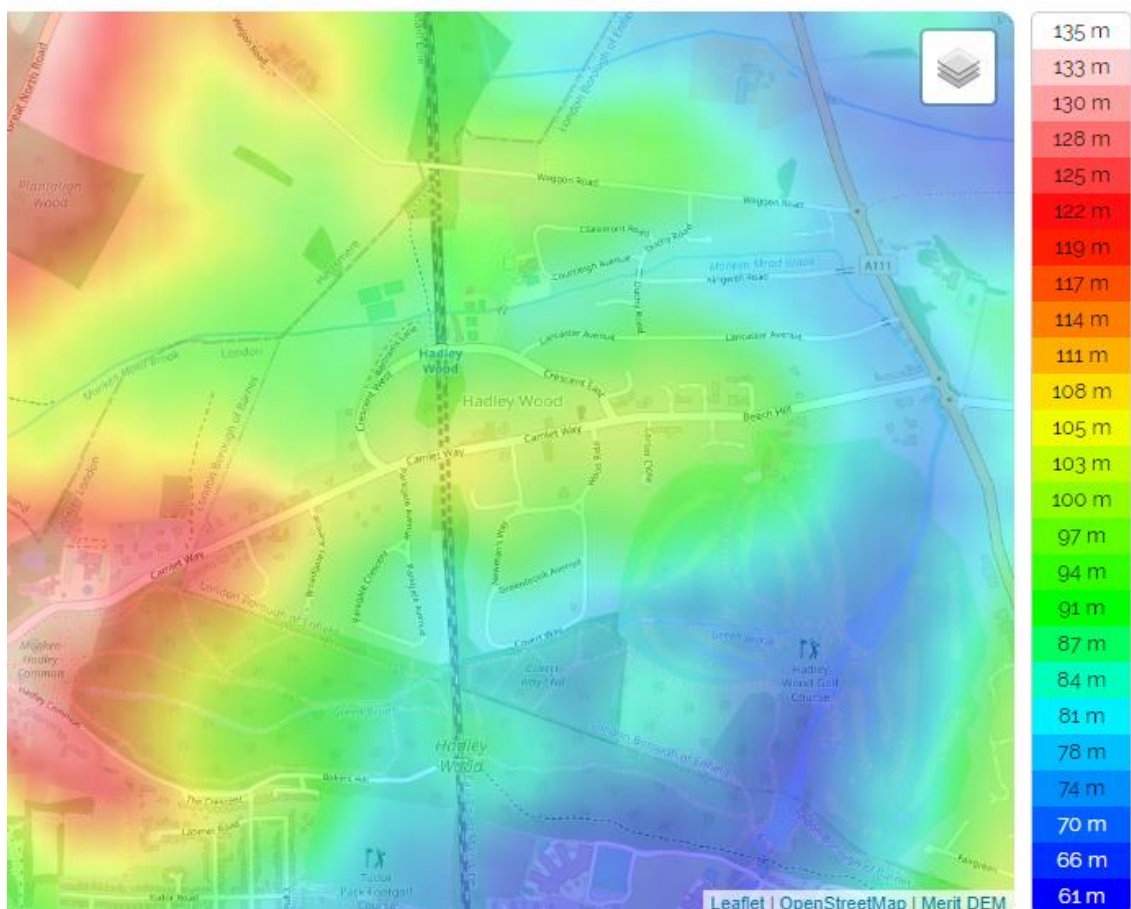


Development proposals outside of these areas will only be supported where they demonstrably contribute to sustainable development, respect local character and are supported by the required infrastructure.

- Although the draft Local Plan measures distances “as the crow flies”, para 7.6.2, which deals with Tall Buildings, acknowledges the better approach by (incorrectly) referring to the 800m being measured based on ‘actual walking route’:

public transport access and amenities. Tall buildings might be considered in close proximity to town centres if within a short walking distance (up to 800m as measured along the actual walking route) and appropriate within the context where this does not adversely impact on the visual hierarchy of the location; and

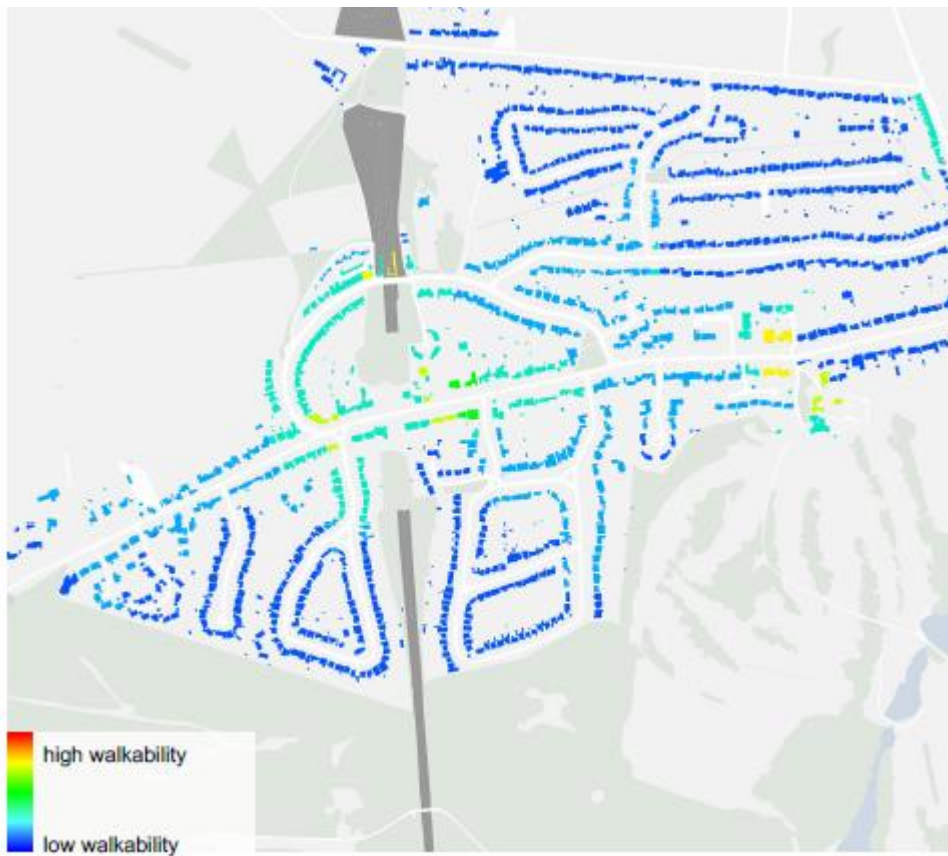
- The use of walking times is very relevant to Hadley Wood not only because of the road lay out, but also because of the meaningful gradients and topography:



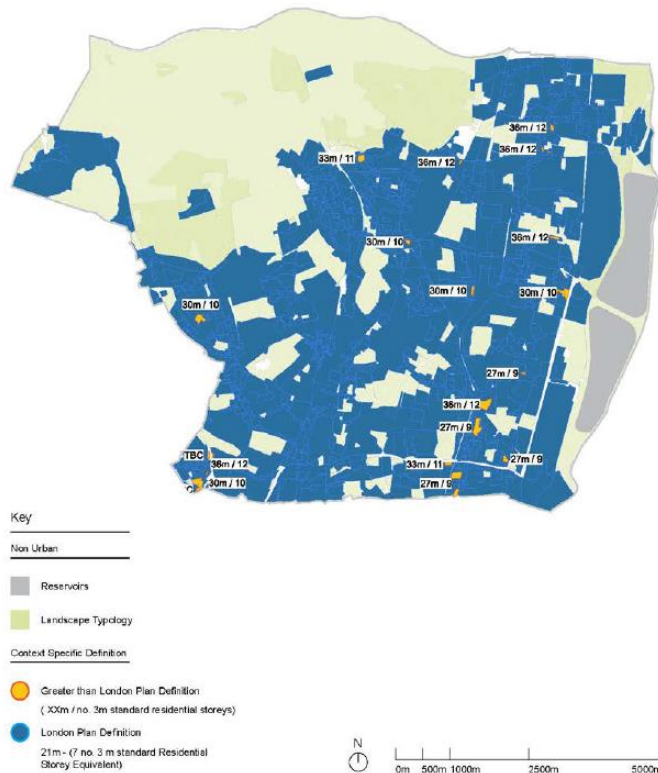
- Using the approach of LB Bexley highlights that only a small part of Hadley Wood can be considered a sustainable development area. The map below highlights the housing within 400m from the station:



- Space Syntax's Walkability index reviewed the broader "walkability" in Hadley Wood, reflecting the amenities within easy walking distance:-



- The Walkability Index assessment reflects the very limited local amenities:
  - The most walkable area in Hadley Wood with an index score of 27 is Crescent West. This is marginally above the average for LB of Enfield;
  - 13 out of the 26 roads in Hadley Wood, i.e. 50% of the roads scored 0;
  - The average walkability index score for Hadley Wood is 7.8, significantly below the average score of 24 for LB of Enfield and 60 for Greater London and 300 for Camden;
  - The low walkability score reflects that, despite the railway station and single bus service, Hadley Wood is not a sustainable development location - necessities, services and amenities are more than two miles away, beyond routine walking distance and therefore require the use of a car.
  - Most of the residential roads in Hadley Wood are disconnected cul-de-sacs or loops that oblige the residents to extra distance to get to their destination; significantly, there is very little that can be done to improve this walkability;
  
- The unsustainability of Hadley Wood as a development location also arises where increased density is pursued through increased building heights. Figure 7.3 (below), relating to tall buildings, is open to misinterpretation and imply that 21m building height is deemed acceptable in all blue areas:-



London Plan para 3.9.3 explicitly states that it is not automatically acceptable for any building to be up to the height threshold for Tall Buildings and that buildings must not lead to unacceptable impacts on the area. Enfield's draft Plan does not make a similar statement, and policy SP DE1 should explicitly state that building heights must reflect the design and sustainability of the locality to ensure that the buildings do not lead to unacceptable impacts on the area.

It is worth noting that in order to help residents and developers LB Bexley's Regulation 19 Plan explicitly states that buildings shall in most of the borough normally not exceed 15 metres' height:-

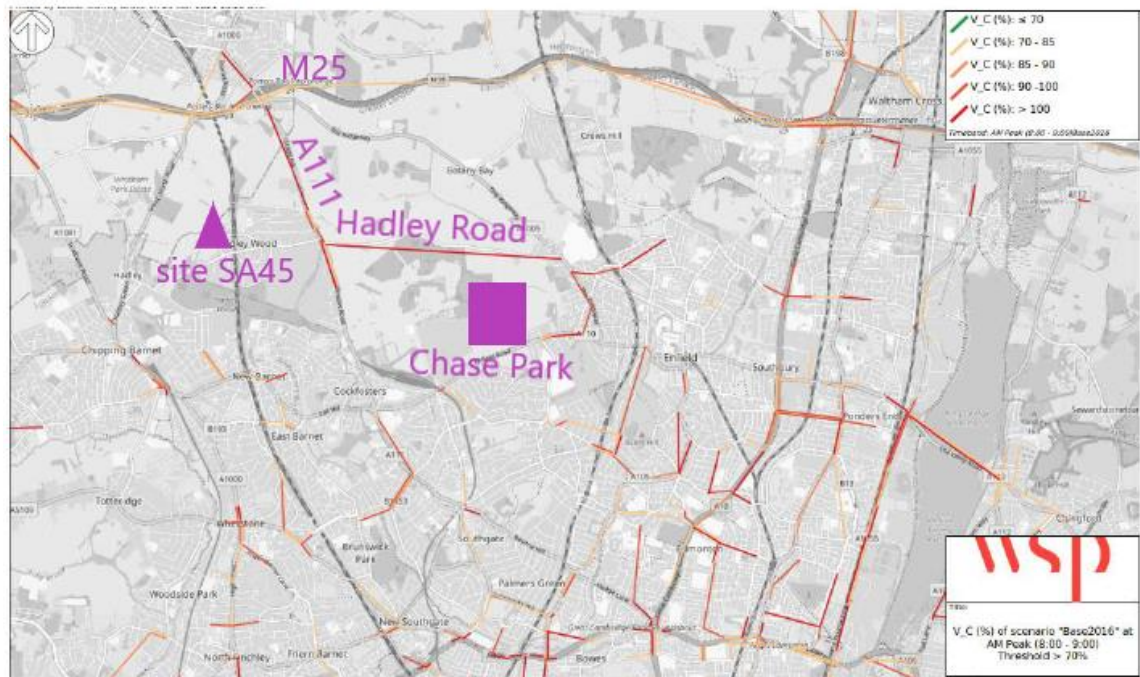
**DP12 Tall buildings and building heights**

**Borough-wide building heights**

1. Typically, the maximum height of buildings shall not normally be more than:
  - a) 45 metres within and near the town centres of Abbey Wood Village and Lower Belvedere, as set out in Part 2 of this policy;
  - b) 25 metres in sustainable development locations as identified on the key diagram (Figure 1) outside of Part 3a of this policy; and,
  - c) 15 metres across the rest of the borough.

- Due to the very limited amenities and poor public transport links Hadley Wood is a car dependent location (see also Transport section below), and additional housing, both in the immediate locality and at Chase Park, will exacerbate the congestion on the A111 (Cockfosters Road/Stagg Hill) and Hadley Road. The Baseline Transport Review for Enfield Council indicates these roads already operate at >100% of capacity, and the material increase in housing, and thus cars, will cause more congestion and air pollution (<https://new.enfield.gov.uk/services/planning/transport-baseline-review-report-wsp-2021-planning.pdf>):-

**Figure 3-11 - Volume/Capacity - AM Peak**



- The above comments highlight that, contrary to NPPF paragraph 105 and London Plan policy T1, Hadley Wood is not a sustainable location for significant development.
- The considerations apply not only to the development at site SA45 but also to the small sites intensification (draft Policy DM H4) and the proposed increased building height (draft Policy DM DE6). The residents fully support good growth and good developments, however, a significant increase in the number of residents would add pressure on the very limited local amenities.

Also, major investment would be required in, for example, drains and sewers, as well as the A111 to reduce congestion and thus air pollution.

- The draft Local Plan has taken a more thoughtful approach to other locations. For example, the Crews Hill Placemaking Study states that: “Working with partners, growth provides the potential to seek future funding to deliver new and improved community and strategic transport infrastructure”.
- The Crews Hill quote above highlights that infrastructure investments are required not only in respect of transport, but also for other community services that are currently lacking (Hadley Wood currently lacks a secondary school, library, shopping, leisure, healthcare, community places, etc). Meaningful investment in these services is not realistic for 160 new homes and the location is not a sustainable development.
- The NPPF, National Model Design Code and National Design Guide all call for good design, with local design codes and policies that are based on character appraisals set out a vision for areas. The draft Plan indicates that a Borough Wide Design Guide will be produced. Because of the importance of the document a draft should have been included in this Regulation 18 Consultation.

## 6. Environmental

### **Objection: Contrary to Climate Change Action Plan**

- Enfield Council declared a Climate Emergency in 2019, and a year later issued a Climate Change Action Plan. The first point of the Vision states that this will mean “More green and blue infrastructure across the borough, with examples including green roofs,, new parks and better access to waterways, with high levels of carbon sequestration.”
- However, Strategic Policy SP SE1 of the draft Local Plan, on Responding to the Climate Emergency, fails to mention the natural environment. The surprising absence of this key consideration is presumably to avoid highlighting the obvious contradiction with the proposal to build a quarter of all new homes on Green Belt land.
- The August 2021 IPCC Report highlights the urgent need to address climate change. To be successful we must both cut emissions and capture & store the carbon dioxide that has been emitted (=sequestration).
- Peat/bog land holds by far the most carbon, followed by woodlands (especially older and slower-growing trees). However, grassland is also a very good ‘carbon sink’, with most held in the roots/soil. (<http://publications.naturalengland.org.uk/publication/5419124441481216>)
- The EU references grasslands in their climate plans (<https://www.reuters.com/world/europe/eu-drafts-plan-grow-carbon-sinks-climate-change-fight-2021-07-06/>), but Enfield’s Green Belt and MOL Study only has one passing reference to carbon sinks, and that only mentions trees:

<b>Climate change mitigation and adaptation</b>	Tree planting and re-wilding projects can create new carbon sinks. Furthermore, increasing the density and biodiversity of the Borough’s flora can combat the urban heat island effect of the large built up areas and flood risk.
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- The fields are not heavily fertilized with nitrogen, so carbon absorption has not been reduced, and they are only lightly grazed and stored carbon has therefore not been released back into the atmosphere. (<https://www.rothamsted.ac.uk/news/grasslands-stopped-fighting-climate-change-over-century-ago>).
- In April 2021 Natural England, the government’s adviser for the natural environment, issued a report on carbon storage and stated: “Whilst creating new heathlands and semi-natural grasslands may not be the top priority for carbon, it is important to protect old established sites due to their importance for biodiversity, as well the carbon stocks they hold, as both may have taken centuries to accumulate”. (<https://naturalengland.blog.gov.uk/2021/04/20/natural-england-publishes-major-new-report-on-carbon-storage-and-sequestration-by-habitat/>)
- The destruction of the Hadley Wood Green Belt land, that has only ever been grassland, is therefore entirely inappropriate and contradicts the local and national policies.

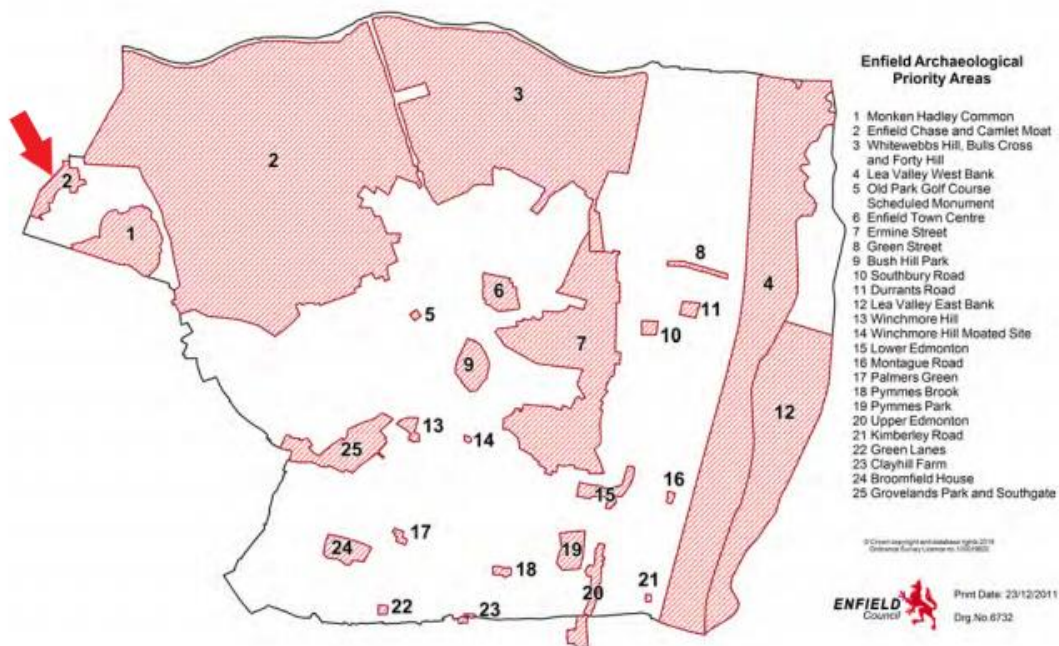
## 7. Heritage

### **Objection: harm to designated heritage assets**

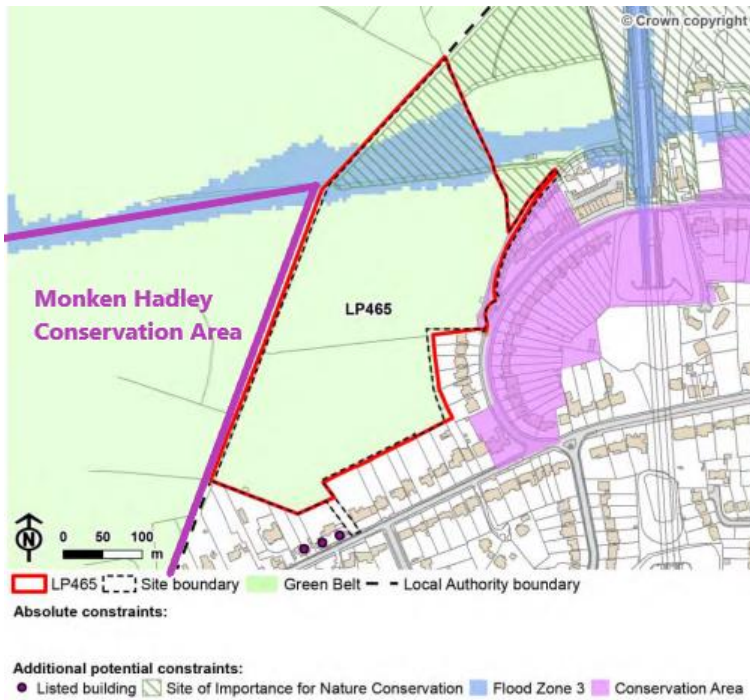
- JB Heritage have, on behalf of the Forum and HWA, produced a Heritage Appraisal on site “SA45 Land at Camlet Way and Crescent West which is attached at Appendix 2 and forms part of this Objection.
- The site is part of the Enfield Chase and Camlet Moat Area of Archaeological Importance. By 1154 the area known as Enfield Chase had become a royal hunting ground and the Hadley Wood site (red arrow below) contained, amongst others, fish ponds to feed visitors.

### 15.1 Areas of Archaeological Importance

Map 15.1 Archaeological Priority Areas



- The site (red outline below) is bordered, and overlooked, by the Hadley Wood Conservation Area and Monken Hadley Conservation Area, as well as Grade II listed buildings.
- **None of the Local Plan documents appears to acknowledge the Monken Hadley Conservation Area.** The Conservation Area was added on the map below, taken from the *Green Belt and MOL Assessment* prepared for Enfield Council. The omission is a significant error, as LB Barnet's Green Belt and MOL Study considered the site to make a "Strong" contribution to the purposes of the Green Belt and development of the Hadley Wood site would adversely impact its character and intrinsic value to the Monken Hadley Conservation Area:



- The SA 45 allocation plan suggests that one of the two entrances to the site would be off Camlet Way, adjacent to Grade II listed buildings, which would be wholly inappropriate:







- Page 366 of the Plan notes that the site is “immediately adjacent to the Hadley Wood Conservation Area. Within immediate setting of Grade II Listed Buildings. Within wider setting of numerous other heritage settings, including ...”. (As mentioned, the adjacent Monken Hadley Conservation Area is not mentioned).
- The Plan acknowledges that the site overlaps the Conservation Area and that “large-scale development could adversely affect the setting of these heritage assets” (pg 577 - <https://governance.enfield.gov.uk/documents/b22747/Item%203%20-%20Draft%20Regulation%2018%20Enfield%20Local%20Plan%20-%20Appendices%20A%20D%20and%20H%2009th-Jun-2021%2019.00%20Counci.pdf?T=9>).
- The Hadley Wood Conservation Area Character Appraisal (Appendix 6) note that (<https://new.enfield.gov.uk/services/planning/heritage-conservation-countryside-information-hadley-wood-caa-sept-2016.pdf>):
  - ❖ It is “surrounded by the open land of the Green Belt to the west, north and east”;
  - ❖ “More attractive breaks occur in the street frontage on the north side of Crescent West, where houses give way to open country, with views out to the northwest of hills and woods” [note: this references the land which is to be developed].
- Policy DM DE5 requires development to “positively contribute to the setting and integrity of important local views (..) and shorter-distance local views (as identified in conservation area character appraisals”. The Hadley Wood Heritage and Character Assessment (Appendix 6) highlights the proposed development site as having “important views”

([http://www.hadleywood.org.uk/uploads/1/4/5/7/14571008/hadley\\_wood\\_heritage\\_character\\_assessment\\_2018.pdf/](http://www.hadleywood.org.uk/uploads/1/4/5/7/14571008/hadley_wood_heritage_character_assessment_2018.pdf/)).

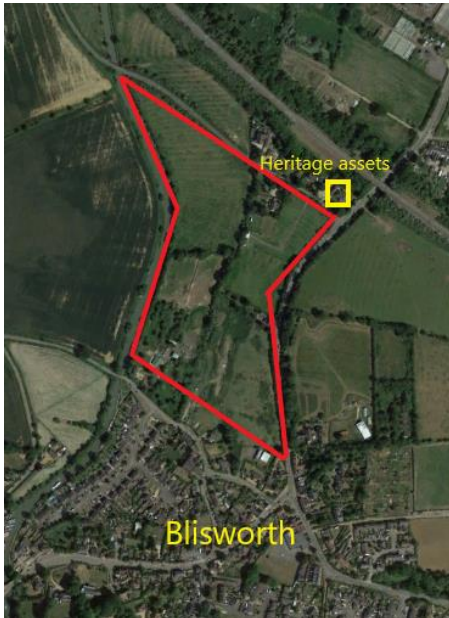
The Hadley Wood Conservation Area Character Appraisal included important views down the tree lined Lancaster Avenue, Crescent West and Crescent East and out over the rural landscape of Hornbeam Hills South Area of Special Character to the northwest from the junction of Crescent West and Bartrams Lane.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



An important view from the conservation area by the entrance to Bartrams Lane over the neighbouring fields

- The adverse effect on the Conservation Areas and Grade II listed buildings breaches various policies:
  - draft Local Plan DM DE10 – development proposals must conserve and enhance the significance of heritage assets;
  - draft Local Plan SP DE4 – heritage must be placed at the centre of Place Making.
  - Para 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 – special attention must be given to preserving or enhancing the character or appearance of the area.
- The development would adversely impact the openness of the area, as already referred to in a.ii) above. The underlying issues are similar to refused planning appeal APP/Z2830/W/20/3265715.

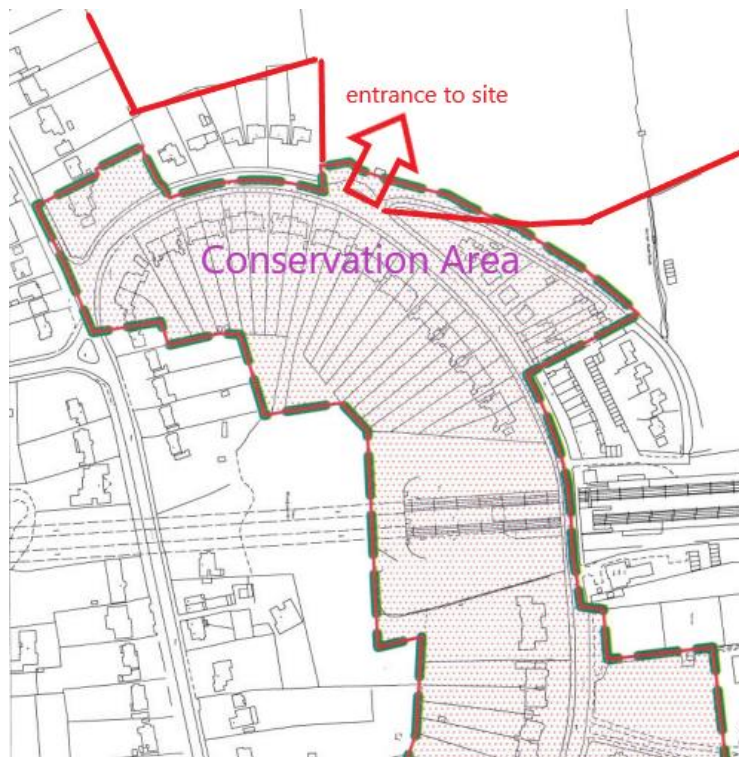
That development proposed 35 dwellings on grassed paddock land with two listed cottages bordering one side. The Inspector found that they were appreciated as sitting within the rural environs of the countryside. The mature planting obscured the views to the development site, but this would be different when the trees were not in leaf. Even with additional planting the rural surroundings would be eroded, and the Inspector concluded there was *less than substantial harm*. The fact that 50% of the new dwellings would be affordable homes carried significant weight, however, as with the appeal at Paulerspury, there was no evidence the housing would alleviate an unmet need within, or close to, Blisworth. As a result the public benefits did not outweigh the harm to the heritage assets.



- Preserve the setting and special character of historic towns -

The Green Belt and MOL Assessment prepared for the Council quotes Historic England’s input: “we agree with the proposed approach to consider London a historic town”. Hadley Wood is part of the Greater London area (and falls under the London Plan).

Part of the site, notably the proposed entrance land, is part of the Conservation Area. The broader site is adjacent to, and overlooked by, the Hadley Wood Conservation Area, the Monken Hadley Conservation Area and several Grade II listed buildings.



The *HWCA Character Appraisal* states: “More attractive breaks occur in the street frontage to the north side of Crescent West, where houses give way to open country, with views out to the northwest hills and woods”.

The *HW Heritage and Character Assessment* describes: “Hadley Wood is a compact settlement and its urban structure is strongly influenced by the rolling underlying topography and rural landscape setting” and “Glimpsed views out of the settlement towards the surrounding rural landscape are a key feature. The elevated position and undulating topography provide many viewpoints to the surrounding Green Belt and to the skyline of central London. Views over the surrounding Green Belt both to the north and south of the ridge are possible..”.

The *Monken Hadley Conservation Area Appraisal* states: “The whole Conservation Area was historically rural, with built development being introduced mainly as residences for the Georgians and Victorians. Later, Green Belt policy has also helped to preserve the agricultural landscapes” and “The land to the north of the properties in Camlet Way and area five [note: this borders the proposed development site] is almost completely undeveloped agricultural land, included in the Green Belt.

- The Enfield Characterisation Study (2011, <https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf>) states, in ‘Rural Green Space – Farmland Ridge and Valleys’, amongst others, that:
  - ❖ “This is a very attractive undulating agricultural landscape;
  - ❖ It is an important area of high quality open landscape with a special character which is highly valued;
  - ❖ The area of this landscape extends from Hadley Wood....;
  - ❖ Long views from the north towards the urban edge of the borough;
  - ❖ **The Farmland Valleys and Ridges landscape type is the borough’s most important landscape type and forms a special area of landscape character which is a major asset for the borough. It is of both landscape and historic significance;**
  - ❖ The designation of the area as Green Belt has meant that the landscape has been well protected from 20<sup>th</sup> century built development;
  - ❖ The designation, protection and promotion of areas within this landscape type as part of a ‘Special Landscape Area’ should be considered; [note: this was subsequently approved]
  - ❖ **The existing Green Belt boundary should be retained and protected, and future development and land use changes resisted.”**
- JB Heritage have prepared a Heritage Appraisal for SA45 Land at Camlet Way and Crescent West on behalf of the Forum and the HWA (attached in Appendix 2).

The NPPF (2021) sets out clear guidance for plan-making with reference to the historic environment. Paragraph 190 states that Local Plans should set out a positive strategy for the conservation of the historic environment that should take account of the desirability of sustaining and enhancing the significance of heritage assets.
- Historic England’s Advice Note 3 “The Historic Environment and Site Allocations in Local Plan” also provides guidance of the process for allocating sites for development in Local Plans. This sets out a five-step process to follow:

**STEP 1 Identify the heritage assets affected**

The site borders the Hadley Wood Conservation Area (LB Enfield) and the Monken Hadley Conservation Area (LB Barnet). Enfield Council did not identify the Monken Hadley Conservation

Area when undertaking this Step 1, which is a major error. If Step 1 is wrong subsequent Steps 2 to 5 will be incorrectly applied.

There is also a cluster of three listed buildings adjacent to the site on Camlet Way:

- Number 83 and attached wall, gatepier and gate (Grade II), NHLE 1079464.
- Number 85 Pegasus (Grade II) NHLE 1358748.
- Number 87 and attached wall, gatepier and gate (Grade II), NHLE 1241164.

**STEP 2 Understand the contribution the site makes to the significance of the heritage assets**

The significance of a heritage asset is the sum of its archaeological, architectural, artistic and historic interest. Significance derives not only from the heritage interests of the asset itself, but also from the contribution made by its setting, defined in the NPPF as:

*“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”*

Hadley Wood was designated as a conservation area in 1989, with the Conservation Area Character Appraisal being approved in 2015 and amended in 2016. The appraisal summarises the special interest of the conservation area as:

- The historic significance of the area in the development of the Borough of Enfield – Hadley Wood provides physical evidence of the transformation of Enfield from a largely rural area to a suburban one in the late 19th and early 20th centuries. It is also of interest in itself as an example of an exclusive, high-status development.
- The original vision of Charles Jack – Jack’s vision, of a prestigious, leafy suburb, consisting of high-quality, well-built properties set around a new station, survives largely intact.
- Street greenery – The abundance of street trees and the well-planted front gardens of many properties give the area a pleasant, green and leafy atmosphere, which is enhanced by the informal treatment of boundaries.
- The spacious feel of the area – This is attributable to the wide roads with open sky above, a set-back building line and generous front gardens.
- The discipline provided by the planned layout of the area – Despite the significant amounts of greenery and informal architectural style of most of the buildings, a clearly conceived layout is evident in the regular building line and relatively consistent size and height of the houses, which provides the area with an overall sense of order and gentle discipline.
- The architectural style of the buildings – The consistent architectural style within each of the principal roads gives a strong sense of cohesion. At the same time, subtle variations in detailing and massing add visual interest to the area.
- The design quality of the buildings – The properties are generally carefully designed and well built, with interesting massing and handsome, well proportioned façades. Strong and lively rhythms are set up by the repetitive use of features such as bays and gables.

- The quality of architectural detailing and materials – Most of the properties, and particularly their joinery, are detailed to a very high standard, and they are built of good quality materials that significantly enhance their appearance.

The Appraisal makes specific reference to the relationship that the conservation area shares with its wider rural surroundings where it states *“Initial impressions of the area are of spaciousness and informality, created by the gently winding roads, variety of house types and the ever-present greenery. This consists of a variety of mature street and garden trees and patches of open land punctuating the housing with occasional views to the open countryside, giving the area a pleasant, leafy ambience. Generous roads and pavements complement the feeling of spaciousness and the lack of traffic and the small number of pedestrians lend the area a quiet, almost serene, atmosphere”*.

The character of the site therefore as open countryside makes an important contribution to the significance of the conservation area by reinforcing the character of having housing within a rural setting and contributing to its sense of greenery.

The Monken Hadley Conservation Area Character Appraisal Statement was adopted in January 2007. It states that:

- *“Monken Hadley is still very green and leafy in character and remains at a low built density. Its special character stems from development in the 18th and 19th centuries”*.
- *“Over half the Conservation Area is open fields and recreational land, which is also covered by the designation of Green Belt.”*
- *“The whole Conservation Area was historically rural with built development being introduced mainly as residences for the Georgians and Victorians. Later Green Belt policy has also helped to preserve the agricultural landscapes.”*

It is therefore clear from the Appraisal Statement that part of its significance is derived from the vestiges of open space and agricultural land.

The Appraisal Statement also describes the area immediately adjacent to the western boundary of the allocation site as *“The land to the north of the properties in Camlet Way and area five is almost completely undeveloped agricultural land, included in the Green Belt. There are clear field boundaries seen in area six to the northern-most tip of the Conservation Area. Rectory Farm (which is to the rear of the Convent school) has become derelict and indeed at the time of writing contains a series of dilapidated sheds and outbuildings. An assessment of the landscape around the farm has shown that this is historic, characterised by ponds and small fields. The field boundaries are long established, as evidenced by hedgerows and hedgerow oaks. It is likely that the field patterns reflect early enclosure which makes them of considerable historical significance. There are also extensive areas of Tree Preservation Orders around Rectory Farm.”*

The character of the allocation site shares many of the same attributes as the land within the conservation area, with historic field boundaries and having the character of pastoral grazing land. Its undeveloped, rural character reinforces the rural character of the land within the conservation area, and can only be considered to be a positive element of the setting that contributes to an understanding and appreciation of Area Six of the Monken Hadley Conservation Area.

The significance of the listed buildings is derived principally from its architectural and historic interest as an example of domestic architecture in the Vernacular Revival Style which was fashionable towards the end of the 19th century. This is augmented further by their historic interest as cottages serving one of the nearby estates, providing evidence for the growth of Hadley Wood as a prestigious suburb.

The listed buildings form a clear group through their spatial arrangement as well as their shared architectural detailing. They were one of the first group of houses to be constructed on this section of Camlet Way, being originally surrounded by open land on all sides. Over the course of the 20th century, Camlet Way has become lined with detached houses which now creates a suburban character to this aspect of their setting. To the rear, their historic setting survives. The properties give way to open land comprising the draft allocation site with further rolling countryside beyond. The open character of this land is a historic survival of their formerly rural location and aids an understanding of the development of this area in the Georgian and Victorian periods as a prestigious and high-status suburb on the periphery of London. The rural character also complements the Vernacular Revival architectural design, reinforcing and making sense of their cottage-like character. The attributes of the site therefore make a positive contribution to an understanding and appreciation of the significance of the heritage assets.

**STEP 3 Identify the impact the allocation may have on that significance**

The Council's own conservation area appraisal highlights the importance of the green, rural character of the site to the setting of the Hadley Wood Conservation Area. The site is specifically referenced in the supporting text as well as in the townscape analysis map, which identifies the view outwards from the conservation area boundary from Crescent West across the site as a key view. It must therefore be considered to contribute positively to the setting of the conservation area.

The proposed development of the SA45 site, from a quantum and scale of development being proposed, would ruin the rural character of the site, including the rural outlook identified to be of importance to the conservation area in the Appraisal. It would replace the grazing land character with one of dense housing development, giving rise to a major fundamental change in the character of a substantial proportion of the last remaining area of open land immediately abutting the conservation area. This major change would neither sustain nor enhance the special interest of the Hadley Wood Conservation Area. In fact, it would erode the green outlook in these views outwards from Crescent West, as well as the remaining evidence of the 19th century transformation of Hadley Wood from rural land to prestigious suburb.

We can therefore only conclude that the development of this proposed allocated site for housing would cause harm to the special architectural and historic interest of the properties and the conservation area that would neither preserve nor enhance its character or appearance.

A significant proportion of the Monken Hadley Conservation Area is open, rural and has been determined by the London Borough of Barnet to contribute to its special architectural and historic interest. The allocated site shares these same attributes and contributes positively to an understanding and appreciation of the green, rural character of the land. Therefore, in its current form it must be considered a positive attribute of its setting. Enfield Council have not taken this into account, as they forgot to include the Monken Hadley Conservation Area in any assessment. The erosion of its rural character in place of concreting over the fields would

neither sustain nor enhance a positive attribute of the setting of this conservation area, but instead, would result in substantial harm.

Whilst there are no views of the allocated site from the public highway through the Grade II listed buildings, the contribution that the setting makes to the significance of heritage assets does not depend on there being public rights or an ability to access or experience that setting. Therefore, the fact that the site cannot be seen through the listed buildings is not considered a determinant in whether or not it contributes to their significance.

There is no convincing case that development on the allocated site would sustain the significance of the listed buildings. The open character of the site is a vestige of their once rural setting which contributes positively to their significance as estate cottages in the Vernacular Revival style. The introduction of built form of this scale would result in harm by virtue of the erosion of the rural character of the site and its replacement with a concrete housing estate.

#### **STEP 4 Look to maximise enhancements to avoid harm**

The impact of the development of the site for a housing estate would result in the loss of the existing green and open character of the land. Whilst developers may propose mitigation measures to lessen the severity of the impact, the delivery of 160 units will have a significant adverse impact by virtue of the fundamental loss of its undeveloped character.

#### **STEP 5 Determine whether the proposed site allocation is appropriate**

The NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. This strategy should take into account the desirability of sustaining and enhancing the significance of heritage assets; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place. This is reinforced in the London Plan.

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:

- 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 assessment the potential for an adverse impact, rating the site 'amber' in the initial assessment. In line with the Council's own adopted heritage strategy, substantial weight must therefore be given to heritage assets and their settings at the strategic planning stage.

Given the level of harm being proposed, the Council should not be seeking to allocate the land for development, but should retain Site SA45 as Green Belt.

## 8. Amenity / Landscape

### **Objection: valuable landscape and setting must be protected**

- Troy Planning have, on behalf of the Forum and HWA, produced a Landscape report (attached in Appendix 1) and forms part of this objection. In addition, Enplan have produced a Landscape and Green Belt Appraisal, which is attached in Appendix 3 and also forms part of this objection.
- Site SA45 is part of the Hornbeam Hills Area of Special Character. There has been no change in circumstances since its designation in 2013 to suggest the nature and/or quality of the landscape has changed.
- The landscape character of this area is recognised in a multitude of documents, including the Hertfordshire Landscape Character Study (Hertfordshire County Council), the Enfield Characterisation Study (LB Enfield), and the Hadley Wood Heritage and Character Assessment (Appendix 6). All point to the important setting of the landscape, field pattern and views. In the absence of a landscape character assessment for the site it is not possible to deduce whether its development would cause harm to the landscape, and therefore whether it is deliverable.
- The historic importance of site SA45 extends to the immediately adjacent Hadley Wood Conservation Area and Monken Hadley Conservation Area. The area of land forms part of the setting of both conservation areas, and needs to be considered in that light.
- The Hadley Wood Conservation Area Heritage and Character Assessment was updated in 2015 and notes that views out across the open countryside comprise one of the key characteristics. This would be undermined by any development of site SA45, causing harm to the Conservation Area.
- The field patterns, hedgerows and views are considered important to the Monken Hadley Conservation Area and these would be put at risk through development of site SA45.
- The Enfield Characterisation Study also makes specific reference to the site and classifies it as part of the 'Farmland Ridge and Valleys' character area. As outlined in the previous section, this area is referred to as "the borough's most important landscape type" and "the existing Green Belt boundary should be retained and protected, and future development and land use changes resisted".
- Enplan have prepared a Landscape and Visual Appraisal (attached in Appendix 3) for a 'high-level' assessment of site SA45. The appraisal sets out an assessment of the landscape character, value,

susceptibility and sensitivity of the landscape context of the site. It defines in broad terms the existing landscape conditions, assesses the character and quality of the landscape and analyses the potential landscape effects of the proposal and their significance, against the existing landscape baseline. The appraisal also considers the potential visual effects of the development at the site, using key viewpoints, and assesses the overall significance of these potential effects.

As part of the evidence base for the Development Management Document, the Enfield Characterisation Study, February 2011, identified twelve landscape character areas for the Borough's rural Green Belt, including Area 1F: Hornbeam Hills South, an area including the potential allocated site and Local Open Space. Also, as part of the same evidence base, the Area of Special Character Review, March 2013, recommended that subject to the draft Development Management Document consultation, the AOSCs first designated in 1994 be separated into 9 distinct areas and be refined to exclude some areas but also to include new areas, such as the Hornbeam Hills South landscape character area. In so doing, the review identified that "This area is similar to the wider area to the west and is an attractive landscape of agricultural land with long distance views to the woods of Wrotham Park to the west"

Policy DMD 84 of the Adopted Development Management Document, November 2014, states that "New development within the Areas of Special Character will only be permitted if features or characteristics which are key to maintaining the quality of the area are preserved and enhanced". The justification and guidance include that the borough has a rich and diverse range of landscape types, and its unique character is strongly influenced by its topography.

The relevant published national and borough landscape character data and assessments include the following:

- National Character Area Profiles: Northern Thames Basin (NCA 111); and
- London Borough of Enfield Characterisation Study 2011.

### **National Landscape Character Area**

The potential allocation lies within the Northern Thames Basin NCA111. This character area consists of four sub-character areas including the Hertfordshire Plateaux and River Valleys. The key characteristics of the Hertfordshire Plateaux and River Valleys relevant to this assessment are displayed as:

- "A diverse landscape with a series of broad valleys containing major rivers Ver, Colne, Lea and extensive areas of broadleaved woodlands being the principal features of the area. The landform is varied with a wide plateau divided by the valleys.....
- Smaller, intimate tree-lined valleys supporting red brick villages provide a contrast to the more heavily developed major river valley floodplains. Within these river valleys, organic field shapes are common, defined by water courses and the legacy of woodland clearances rather than formal enclosure patterns....."

The landscape character of the Hertfordshire-London fringe ".....comprises much transitional countryside as rural Hertfordshire merges into northern London suburbs. It is often despoiled by urban activity, particularly the motorways and associated services, power lines and so on. However,

there is much local landscape diversity and interest characterised by a patchwork pattern of fields and woodlands”.

### **Borough Landscape Character Areas**

The London Borough of Enfield published the Enfield Characterisation Study: Final Report in February 2011 as part of the evidence base for the preparation of the Development Management Document 2014. This identified two character areas relevant to this application (refer to Figure 3). As detailed below, the potential allocation lies outside the urban area and within Character Area 1F: Hornbeam Hills South. This incorporates the allocation in the south-east corner of the character area with the remainder stretching to the borough boundary along Barnet Road to the west and up to and over the M25 to the north. To the east is Character Area 1A: South Salmon’s Brook Valley. This runs north to The Ridgeway.

The key characteristics and distinctive features of the Hornbeam Hill South character area are as follows:

- “Sloping valley landforms
- Geometric field pattern
- Mainline railway in cutting/tunnel
- Potters Bar and M25 to the north-west
- Limited Rights of Way”

The character description highlights that this character area is the south-eastern corner of a larger landscape character area defined in the Landscape Character Area for South Hertfordshire (2000). Also, it specifically refers to a “small corner of this character area comprising four fields and an adjacent track (Bartram’s Lane).....”, visible from the public layby on Crescent Way, as being an “attractive landscape of agricultural land with long distance views to the woods of Wrotham Park to the west.” This is a reference to the fields comprising site SA45 and the Local Open Space. Key issues include that: although only a small area, this character area is part of an important wider area of Green Belt and is in good condition; that the Green Belt boundary is clearly defined by Bartram’s Lane and the rear boundaries of properties on Camlet Way and Crescent Way; and highlights the importance of the local open space. Under the heading ‘Implications’ it is noted that the existing character and pattern of uses, and hedgerows should be retained and managed.

The key characteristics and distinctive features of the Salmon’s Brook Valley character area are described as:

- “Frequent small woodland blocks;
- Valley drained by Salmon’s Brook with undulating valley sides;
- Geometric fields of mainly pastoral farmland with some arable fields;
- Mature hedgerows with frequent large mature hedgerow trees (mainly oak);
- Secluded with few roads;
- Views across the valley from Ferny Road/Hadley Road and the Ridgeway;
- Views south towards Enfield Chase and Hadley Wood;
- Wrest Lodge Park and Beale Arboretum;
- Electricity pylons in the north east corner of the area;

- Scattered farms.”

Under ‘Key Issues’ the study identifies the long views across the area as being valued and worthy of protection, identifying that “In some areas, recent development is prominent, for example, the northern edge of Hadley Wood and detracts from the quality of these views”. The area’s protection by Green Belt policy is noted, as is the fact that the south-west boundary of the area at Hadley Wood is “well-defined” by Cockfosters Road and Waggon Road and that “Proposals for development on the north side of Waggon Road and east side of Cockfosters Road should be strongly resisted to ensure that the Green Belt remains a clear and enduring boundary.”

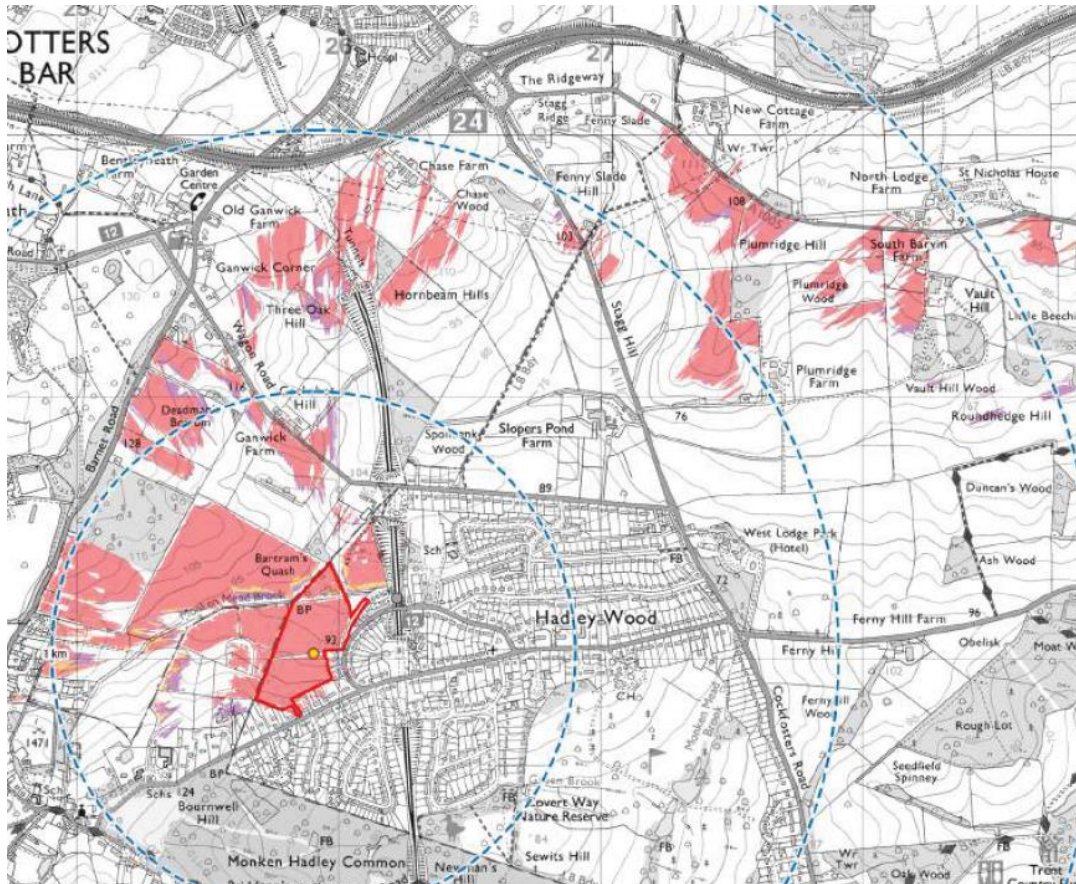
In evaluating landscape value, it is appropriate to consider a range of factors (as defined GLVIA310) to understand the specific attributes of value which a landscape may have to a greater or lesser degree. Such aspects include, in turn, whether the landscape is afforded any national, regional or local designation and/or any management policies which recognise particular values, its landscape condition, scenic quality, rarity, representativeness, conservation interests, recreation value, perceptual aspects and, also, its associations, typically in art or literature. It is also important to define the area being considered. In this case, the appropriate area is the immediate landscape context of the potential allocation plus the site itself (as described in paragraphs 4.13 to 4.15 above); this is a triangular area bounded by the urban edge of Hadley Wood, Barnet Road to the west, and the railway line and tunnel to the north-east. The table below sets out the assessment of landscape value against the criteria above.

Landscape Unit	Landscape Designation	Landscape Value aspects	Assessment (overall evaluation highlighted)
Immediate Landscape Context including the potential allocation (as identified above)	Designated as an Area of Special Character in Development Management Document 2014	Landscape Condition	<b>Good-Very Good</b> , active mixed farming uses and well-tended.
		Scenic Quality	<b>Moderate-High</b> , attractive rolling and mature countryside, with sparse, inconspicuous development.
		Rarity	<b>Not rare</b> but largely consistent with both landscapes to the west (outwith the borough) and east (within the borough).
		Representativeness	<b>Strongly characteristic</b> of wider landscape context both within and outwith the borough.
		Conservation Interests	<b>Moderate</b> and related predominantly to the pasture, hedges and woodland.
		Recreation Value	<b>Moderate-High</b> , not especially accessible but it includes the designated Local Open Space with playing field and informal recreational area of grassland and woodland.

		Perceptual Aspects	<b>Moderate</b> sense of tranquility and remoteness, which is unexpected given the proximity to the urban area.
		Associations	Understood to be <b>relatively limited</b>

The assessments are broadly consistent with the findings of the Enfield Characterisation Study, 2011, description for the Hornbeam Hills South landscape character area, which recognises the attractiveness of this area of countryside. It is considered that the landscape context of the potential allocation and the site itself, is of a moderate to high level overall and of clear borough and countywide importance. Its current designation as an Area of Special Character, through the Development Management Document 2014, recognises this value. Paragraph 174 of the NPPF requires that planning policies and decisions should protect and enhance “valued landscapes”. This assessment concludes that this landscape is a valued landscape for the purposes of Paragraph 174.

- The Zone of Theoretical Visibility produced as part of the landscape assessment (Appendix 3) that informed this objection indicates that the development of site SA45 would result in:
  - slightly longer distance visibility from Barnet Road to the west and north-west;
  - Broad, Close range visibility from the Conservation Area to the south and the Local Open Space to the north-east;
  - Mid distance visibility from Wagon Road in the north;
  - Mid and long range visibility from The Ridgeway to the north-east; and



- The adverse impact on the visual amenity of the Local Open Space that is adjacent to site SA45 would be very material, especially if buildings were to comprise more than two floors (as appears to be the plan).
- The impact on the rural character views from Wagon road to the north would also be very meaningful.
- The landscape is highly sensitive to change and the proposed development would be in stark contrast to the leafy, low density urban edge. The substantial adverse effect on the landscape and the visual harms, together with the very high harm to the Green Belt – as identified in the Green Belt and MOL Study – should result in the site being retained as Green Belt.

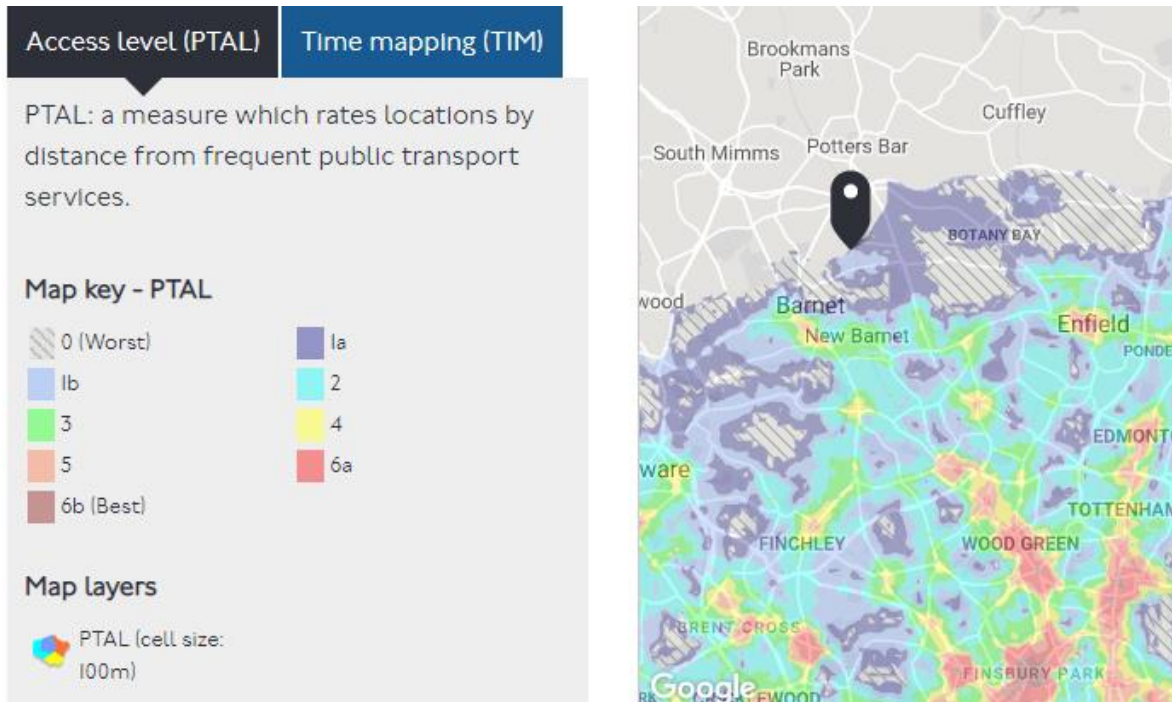
## 9. Transport

### Objection: Car-dependent location is not sustainable development

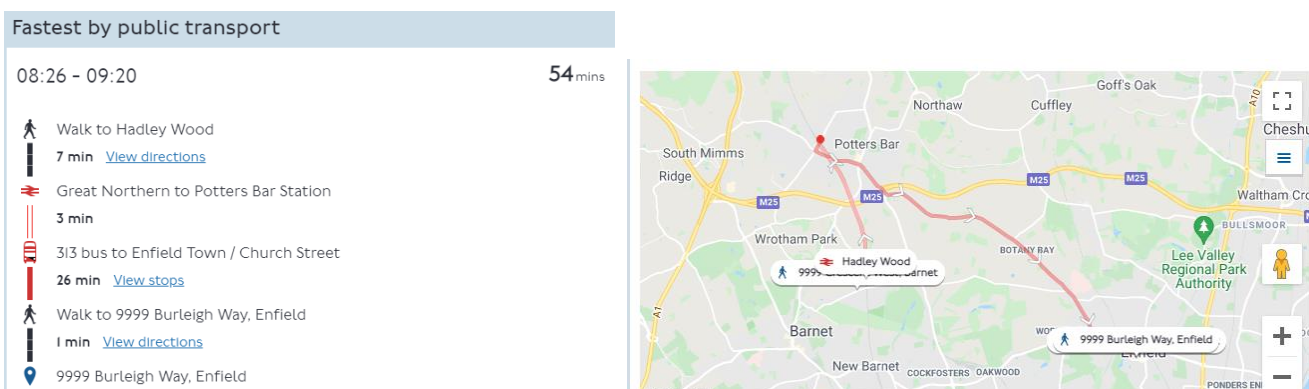
- Troy Planning on behalf of the Forum and HWA have produced a report on the Transport impacts of the draft Local Plan (attached at Appendix 1) and forms part of this objection.
- The Enfield Characterisation Study (2011, <https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf>) categorises Hadley Wood as a residential, perimeter block, Large Suburb and states that:
  - ❖ “It retains an almost rural character”;

- ❖ “Very low density areas both favour and require the car. The sparseness of the population is not able to sustain local shops and facilities in easy walking distance. Pedestrians can be poorly provided for, with a footway on one side of the road only or very narrow provision, as found on Waggon Road in Hadley Wood”.

- Hadley Wood is in a PTAL 1a/b zone (site SA45 marked), reflecting poor public transport availability:

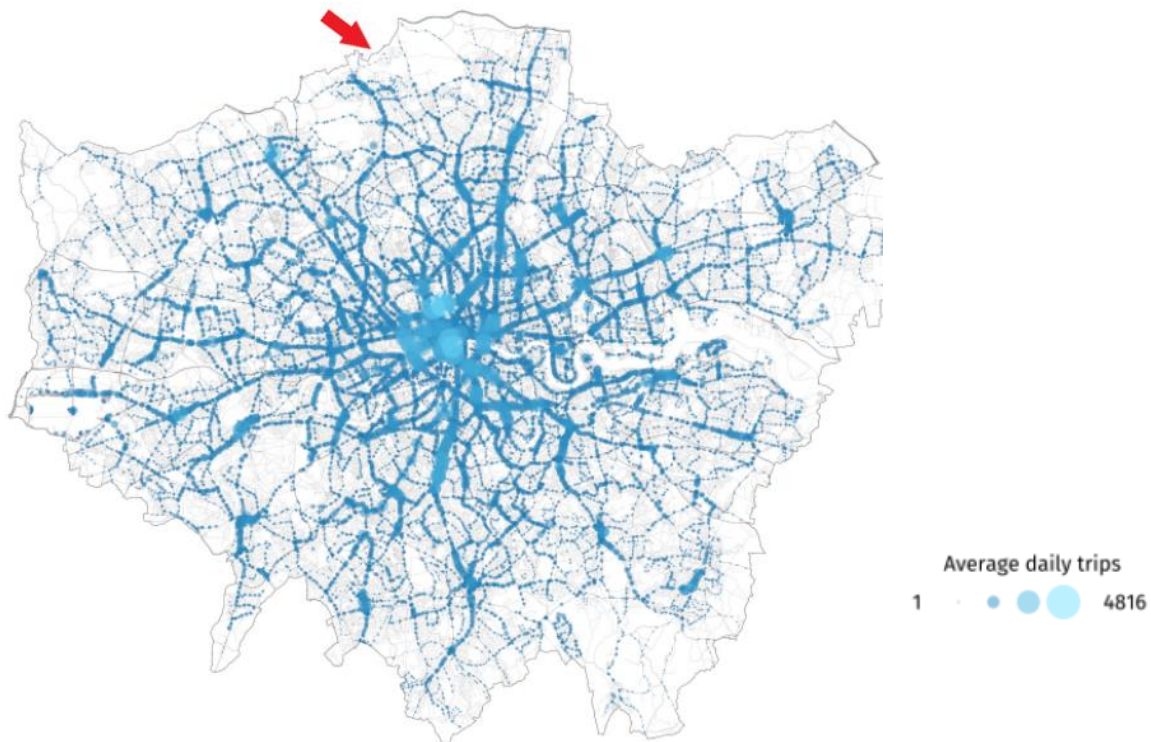


- There is virtually no east-west public transport and, for example, the quickest way to travel by public transport to Enfield town centre (54 minutes) is to catch a train north and catch a bus outside the Greater London area:-



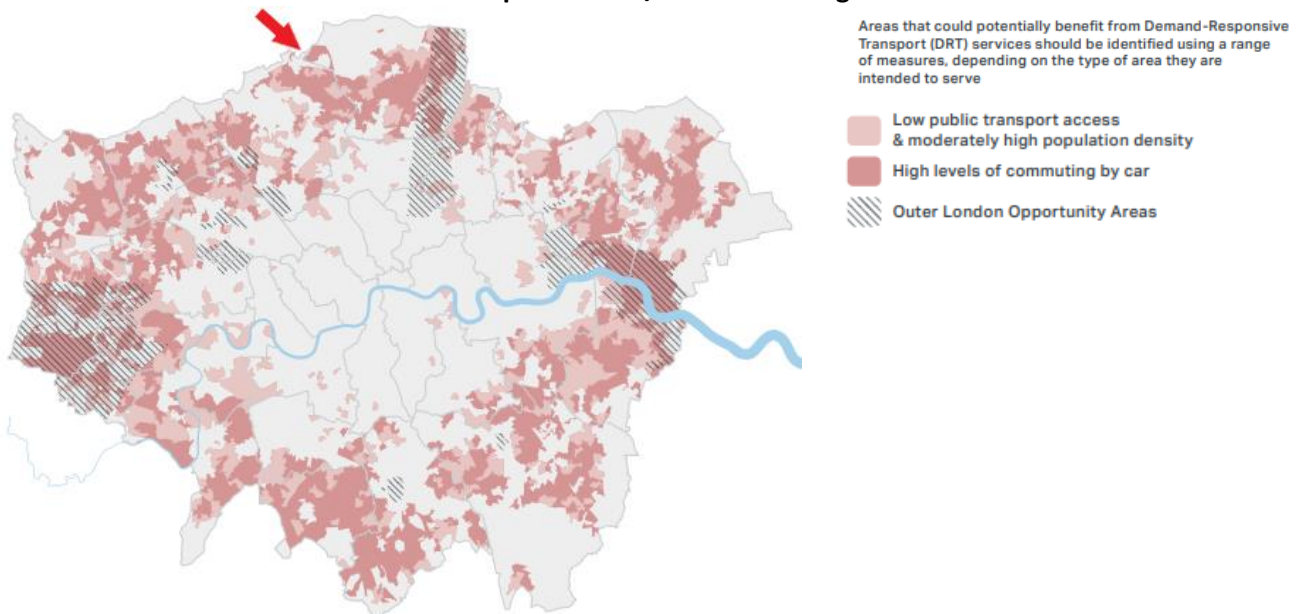
The map below, taken from the London Mayor’s Transport Strategy, confirms that, as a result, there is very limited use of public transport (<https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>):-

**Public transport – weekdays**



- The car-dependency is also reflected in the Urban Mobility Index (<https://urbanmobilityindex.here.com/city/london/>):

**Public transport access / Car commuting**

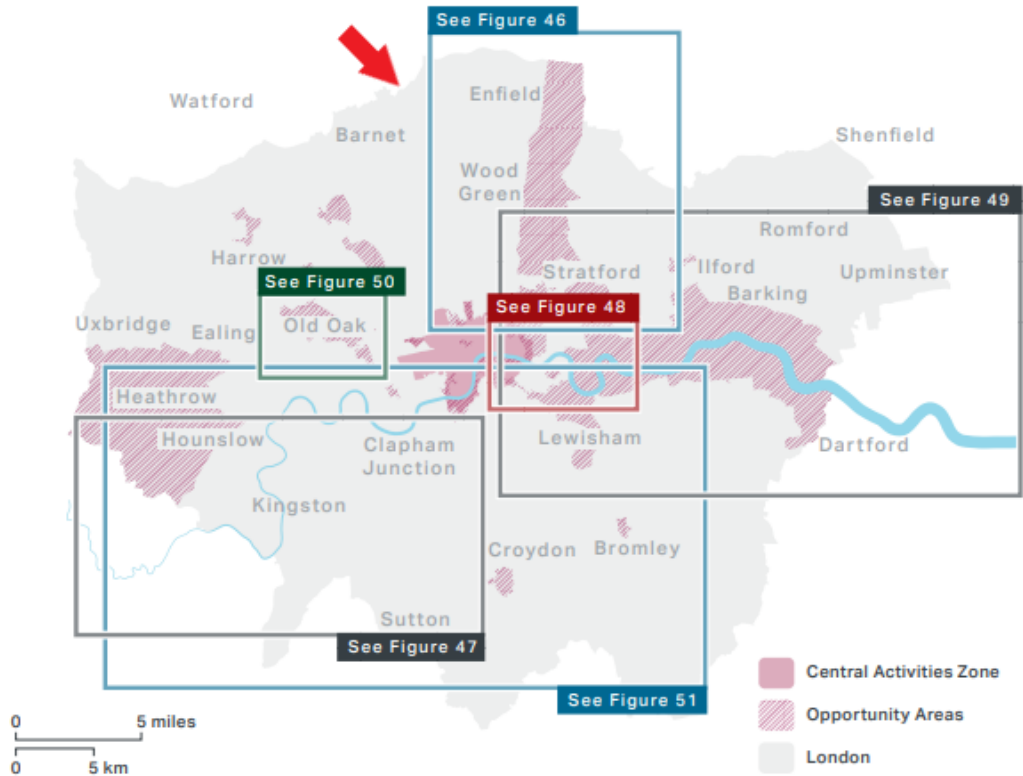


- In order to improve the sustainability of Hadley Wood as a development location public transport would have to be improved. However, neither the 160 homes proposed for site SA45 nor the intensification/small sites policies would be sufficient to warrant the huge investment in



infrastructure needed to improve the situation, and the London Mayor’s Transport Strategy does not suggest Hadley Wood (red arrow) is in an area of focus:

**FIGURE 45: ‘FOCUS AREAS’: WHERE TRANSPORT IS THE ENABLER OF SIGNIFICANT CHANGE TO AN AREA**

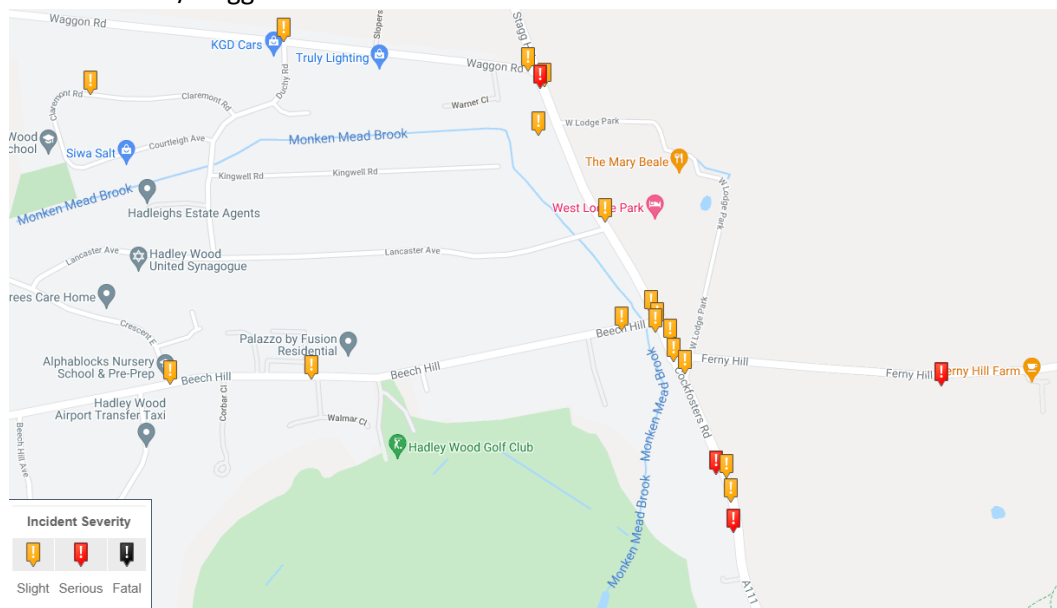


- Hadley Wood will therefore remain a car-dependent location, and additional housing, both in the immediate locality and at Chase Park, will exacerbate the congestion on the A111 Cockfosters Road/Stagg Hill and Hadley Road. The Baseline Transport Review for Enfield Council indicates these roads already operate at >100% of capacity, and the material increase in housing, and therefore cars, will cause more congestion and thus air pollution (<https://new.enfield.gov.uk/services/planning/transport-baseline-review-report-wsp-2021-planning.pdf>):-

**Figure 3-11 - Volume/Capacity - AM Peak**



- The increase in traffic is also likely to increase the already worrying number of accidents on the A111 Cockfosters Road/Stagg Hill:



- The above comments highlight that, contrary to NPPF paragraph 105 and London Plan policy T1, there is no proof that Hadley Wood is a sustainable location for development.

## 10. Housing Numbers

- Troy Planning have, on behalf of the Forum and HWA, produced a report on the housing need and site selection process as set out in the draft Local Plan (attached in Appendix 1).
- The NPPF seeks to ensure that a sufficient supply of homes are delivered. Paragraph 68 addresses how land for homes should be identified and states:

“strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan”.

Paragraph 119 of the NPPF is also relevant as it states that “planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.

The recently adopted London Plan (2021) ascribed Enfield with a ten-year housing target (net housing completions) of 12,460 homes over the period 2019/20 to 2028/29.

Policy H1 of the London Plan details how London boroughs can achieve their respective ten-year housing targets by:

“allocating an appropriate range and number of sites that are suitable for residential mixed-use development and intensification”;

“encouraging development on other appropriate windfall sites not identified in Development Plans”; and

“Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:

- a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary;
- b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets;
- c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses;
- d) the redevelopment of surplus utilities and public sector owned sites;
- e) small sites;
- f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London’s economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.”

Quite rightly, this policy recommends that boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.

With regards to other sources of supply, clause (A) of Policy H9 (Ensuring the Best Use of Stock) of the London Plan states that “boroughs should promote efficient use of existing housing stock to reduce the number of vacant and under-occupied dwellings”.

There are currently circa 3,000 vacant residential properties in the London Borough of Enfield. This equates to 12% of the supposed 25,000 housing need and if just 160 of these vacant homes could be brought back into use there would be no requirement to build on the Green Belt in Hadley Wood. The Council should be promoting policies to get these 3,000 vacant homes back into use and counting these homes within their housing supply figures, as these homes should all be capable of being brought back into use within a 5 year period.

As summarised within the Enfield Housing Numbers Paper (2021), the ‘roll over’ approach (whereby the GLA requires boroughs to roll forward their assessment of supply [derived from the GLA SHLAA 2017]) results in a post-2029 annual need figure of around 500 dwellings per annum (dpa). This significantly contrasts with the 1,246dpa London Plan figure (up to 2029) and the Standard Method figure of 1,744dpa (2019 PPG version). The reasoning for these discrepancies is underpinned by the GLA 2017 SHLAA methodology, which, as explained in the Enfield Housing Numbers Paper (2021), took account of strategic policy constraints – which in LB Enfield’s case includes the high proportion of the borough which is designated as Green Belt, whereas the ‘policy off’ approach of the Standard Method and the London Plan 10-year housing need target do not consider any potential supply constraints. Therefore, the GLA SHLAA (2017) derived figure of around 500dpa is almost exclusively a product of the small sites element of the GLA SHLAA (2017) needs assessment.

Given the above, it is noted within the Enfield Housing Numbers Paper (2021) that the post-2029 local annual housing need figure should be established by taking the GLA SHLAA (2017) as a baseline figure and supplementing this with additional evidence of local need.

The Enfield Strategic Housing Land Availability Assessment (SHLAA) (2020) summarises that:

“Enfield’s current assessment of need based on the Standard Methodology set out in the NPPG is 4,397 dwellings per annum [...]. The Publication London Plan (Dec 2020) contains a target for Enfield of 1,246dpa. Although this plan has been subject to Examination it still remains the subject of disagreement between the Mayor of London (and GLA) and the Secretary of State (SoS). It is not known at this stage whether or not the Plan will eventually be adopted. There is also some considerable uncertainty as to what the implications of the Standard Methodology are for the next iteration of the London Plan and the requirement on Enfield post 2026. Further uncertainty has been introduced by the Planning White Paper, which puts forward proposals for the Government to set binding housing requirement figures for individual local plans that would take into account supply, policy and environmental factors. These provisions do not yet exist and are unlikely to do so for some time [...] in view of the high level of uncertainty the council will continue to use a range from 1,246-4,397dpa when considering its housing requirements”.

Given the vast differences in housing target figures, it is deemed entirely unjustifiable to find supply which aligns with the rolled over Standard Methodology figure (as set out in the PPG), as existing Green Belt policies within both the London Plan and NPPF conclude that removal of Green Belt land can only be justified in ‘exceptional circumstances’. Furthermore, once adopted, the emerging revised Standard

Methodology will take account of local constraints on delivery to produce binding local housing targets at local authority level (White Paper [2020], as cited in Planning Resource article [2021] ). This revised Standard Method would take account of delivery constraints such as Green Belt designations, the availability of brownfield land and the need for other alternative uses.

In the absence of any justifiable local housing need figure, the Regulation 18 Local Plan's strategy of releasing large areas from the Green Belt is not justified and does not align with paragraph 137 of the NPPF and Policy G2 (London's Green Belt) of the London Plan. Linked to this, it is also considered that LB Enfield has failed in their duty to objectively assess all sources of housing supply, as alternative sources of supply such as brownfield SIL sites have not been assessed and phasing of development at Meridian Water extends beyond the Plan period when instead, the Council could, and should, be facilitating delivery of this strategic site as a flagship scheme that has been in planning and development for well over a decade. Development there should be expedited, rather than releasing Green Belt sites.

The above also demonstrates that LB Enfield Local Plan conflicts with the London Plan, which states that "boroughs proposing changes through a Local Plan to Green Belt or MOL boundaries (in line with Policy G2 London's Green Belt and Policy G3 Metropolitan Open Land) to accommodate their London Plan housing target should demonstrate that they have made as much use as possible of suitable brownfield sites and underutilised land, including – in exceptional circumstances – appropriate industrial land in active employment use. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged." As such, it is evident that LB Enfield Council has failed to demonstrate how all alternative sources of supply have been considered.

The Council Owned Land and Buildings Register includes 457 entries classified as either (as in accordance with the criteria listed above in Policy H1 of the London Plan) a car park, depot, garages, industrial, lorry parks or retail units. Whilst further site details have not been made public by the Council, it is clear that there is a failure to assess the potential longer-term untapped supply from these Council-owned (publicly owned) sites, as the Capacity Study Site Identification (2020) does not clarify exactly which publicly owned sites were assessed, and states that "the Council is a significant landowner in the borough and provided AECOM with data on LBE landownership. However, not all land owned by the Council is or will be available for residential development, for example if it is in active alternative use".

This is a clear dereliction of duty by the Council, as it has failed to objectively assess all sources of supply.

A further flaw of the Capacity Study Site Identification (2020) is that it failed to adequately assess the housing supply potential of industrial areas. Whilst the Study did state that it took account of both the Enfield Industrial Intensification Study and the Phase 2 Green Belt/MOL Study, this review was incredibly limited, as the LB Enfield Capacity Study Site Identification (2020) Study omitted all identified wider areas of search within the aforementioned studies. This was justified as follows:

"As determining site availability was within the scope of neither the Industrial Intensification Study nor the Phase 2 Green Belt/MOL review, the remaining areas of search were considered to be unavailable in the absence of evidence to the contrary and were thus excluded from further assessment in the Capacity Study. However, this does not exclude the possibility that they may represent possible options for growth should availability be established in the future, for example through a change in local

planning policy. As standalone sources, therefore, neither the Industrial Intensification Study nor the Phase 2 Green Belt/MOL review yielded any further unique, available, sites for suitability assessment.”

This omission conflicts with the Mayor of London’s Draft Module A Good Quality Homes for All Londoners Guidance (2020), which promotes the intensification and co-location of uses and the Mayor of London’s Draft Industrial Intensification Primer (2017) which acknowledges the growing pressure on London’s industrial land and states that consideration must be given as to “how industrial areas can be used more intensively and how industry can be integrated in residential areas”. Indeed, and despite not reviewing these sources, the extract above makes clear that there is likely to be capacity for growth in the employment areas. Before Green Belt land is proposed for release these sources should be fully assessed.

It is clear that the LB Enfield Capacity Study Site Identification (2020) has failed to proactively explore opportunities for the co-location of residential and industrial uses on wider areas existing industrial land which are not currently in the development pipeline. As a result, the adopted approach of the Study is reductionistic and contrary to Policy E7 (Industrial Intensification, Co-Location and Substitution) of the London Plan, as the Regulation 18 Local Plan has not explored opportunities to promote “mixed-used development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses”.

The individual site assessment (in Appendix D [Full Assessment of Potential Sites] of the LB Enfield SHLAA (2020) for ‘Land between Camlet Way and Crescent Way’ (COC8) states that the availability period for the site is in years 11-15 of the Local Plan. However, Appendix D (Full Assessment of Potential Sites) of the LB Enfield SHLAA (2020) has failed to provide any information on the site’s availability or achievability.

Evidence to justify its deliverability (of which information on the availability of the site is required) is a clear pre-requisite of the NPPF for ‘sites allocated in a development plan’, as Annex 2 (‘Deliverability’ definition [clause B] within Glossary) of the NPPF states that allocated sites “should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”. To clarify this definition, the Secretary of State (2020) states that “the proper interpretation of the definition is that any site which can be shown to be ‘available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years’ will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available.”

We are aware that the site has been let on a long lease with circa 9 years to expiry and the current Tenant would like to extend their lease. The site should therefore not be classed as being available and deliverable. Surely, the council can find 160 new homes in the next 10 years from brownfield sites to avoid having to build on this valuable green belt site.

## 11. Other proposed developments on Green Belt land

- The Plan also suggests the release from Green Belt of large plots of land at Chase Park, Crews Hill and at junction 24 of the M25.
- Many parts of these sites are high quality, undeveloped Green Belt with poor public transport access.
- As per the previous section:
  - the Plan fails to demonstrate that brownfield sites have been exhausted and fully developed.
  - Meridian Water, first discussed as a regeneration site over 10 years ago, only delivers 5,000 homes out of the total capacity of 10,000 in the 20 year Plan period. Full development of Meridian Water would cover most of the housing planned for Green Belt sites.
  - The Plan fails to respond to other potential brownfield sites, as identified in ‘Space to Build in Enfield’ a joint report from CPRE and the Enfield Society.
  - The Plan fails to respond to the opportunities in high streets and offices left vacant following dramatic changes to shopping and working habits as a result of the Covid 19 pandemic.
  - Identified sites at Chase Park and Crews Hill are in areas of poor public transport access (PTAL 1a and 1b), and with poor road access and limited public services. These car dependent locations are not suitable for Good Growth.
  - The *Green Belt and MOL Assessment* concludes in respect of the site at Junction 24 of the M25 that the Harm of Releasing Whole Assessment Area is “Very High” (page 79, [https://new.enfield.gov.uk/services/planning/green-belt-and-mol-assessment\\_final-report-luc-2021-planning.pdf](https://new.enfield.gov.uk/services/planning/green-belt-and-mol-assessment_final-report-luc-2021-planning.pdf)).
  - The new developments at Chase Park and Crews Hill will also be car-dependent, and in particular the former will materially increase congestion on the A111 Cockfosters Road. The Baseline Transport Assessment indicates that Cockfosters Road (and Hadley Road) already operate at over 100% of capacity, and the proposal to add thousands of homes whose occupiers will be using these roads is nonsensical.
  - Especially the new Chase Park development will be at a greater distance from tube and railway stations than the Mayor of London’s Good Growth principles set out.

## 12. Other policy changes

- The Plan states that it will replace, amongst others, the Core Strategy and Development Management Document. It is not clear whether supplementary documents will contain further details, or whether certain concepts and requirements/restrictions have been consciously removed.
- The policies are significantly less definitive, with wording such as “where appropriate” giving Case Officers more discretion to decide what is acceptable. Given the surprising frequency of approvals of applications with material breaches of policies, the lack of transparency of the decision-making process and the absence of a right of appeal by interested parties, the Case Officer discretion is a major cause for concern.

- Below are comments on the draft Local Plan policies, as well as responses to the requests for input:

## **Section 2 – Good Growth in Enfield**

- Pg 20 – Monken Mead Brook is a designated Main River and should be added to point 11, as it is a major resource in the prevention of flooding in Hadley Wood.
- Pg 21 – it is misleading to state in point 18 that “new homes are supported by high quality infrastructure, including education, health, sports, cultural facilities and digital infrastructure” when the proposed development of 160 homes on Green Belt land in Hadley Wood, where transport links are poor and amenities largely non-existent, is not accompanied by a plan to improve (and finance) the requisite infrastructure upgrades.
- Strategic Policy SP SS1, point 9, indicates that “a new logistics hub close to Junction 24 of the M25 will provide for a significant amount of the Borough’s employment needs”. That is presumably an erroneous statement as the 30,000m<sup>2</sup> of new space at that location only represents 12% of the total projected 251,000m<sup>2</sup> increase in industrial and logistical floorspace.

Furthermore, para 9.2.1, which references the London Long Term Labour Market Projections, appears to suggest that the aim is to create 10,000 new jobs by 2041. If, per above, “a significant amount” of that is to come from the land by Junction 24, how are these workers meant to get to the PTAL 1a location where public transport connectivity is almost non-existent? Staff will rely on car use, with the 6,000+ additional homes on Green Belt land in Chase Park, Hadley Wood and Crews Hill also largely using the same roads (A111 and A1005) to access the M25 at the same Junction 24.

Traffic jams are already a frequent occurrence, with the development at Cockfosters station adding to congestion caused by pedestrians crossing the road at the tube station. All this will cause an unacceptable increase in air pollution and contradicts the aims of the Climate Change Action Plan. The Local Plan contains unacceptable extensive use of Green Belt land for new housing, without a realistic and deliverable plan for making these sustainable developments with requisite amenities that are accessible via realistic public transport and walking/cycling.

## **Questions**

- Are there other key aspects of the spatial portrait?* The poor public transport links in many parts of the borough are not flagged or addressed.
- Are there other key opportunities and challenges?* How to increase and speed up the development of brownfield sites, and how to finance the infrastructure and amenities needed to establish sustainable developments.
- Are there other key spatial issues?* See above.
- Has the right spatial strategy option been selected?* No. The Plan must do better with respect to the development and prioritisation of brownfield sites. For example, only half of the 10,000 projected homes at Meridian Water have been included in the 20 year Plan, even though that development has been in the works for over 10 years. Furthermore, a study by CPRE London and Enfield Roadwatch identified a significant number of brownfield sites for development, very few of which appear to have been incorporated into the Local Plan.  
([https://www.london.gov.uk/sites/default/files/ad\\_84\\_space\\_to\\_build\\_enfield\\_report\\_final.pdf](https://www.london.gov.uk/sites/default/files/ad_84_space_to_build_enfield_report_final.pdf))
- Any proposed changes to the key diagram?* The intensification around stations is a blunt instrument that has been applied indiscriminately. It fails to consider whether locations are suitable for sustainable developments – for example, it ignores the PTAL (which Enfield has unilaterally decided



inaccurately reflects public transport availability, contrary to the London Plan) and the availability of local amenities.

- *Any proposed changes to the Spatial Strategy policy?* The overarching strategy, “to provide sustainable growth with supporting infrastructure across the Borough whilst facilitating nature recovery and improvements to green and blue spaces and access to them”, is a laudable aspiration but not delivered under the proposed Plan. For a quarter of the proposed new housing to be on Green Belt land, in locations with poor public transport links and amenities, is nonsensical if at the same time the Plan wants to increase green space. This is a waste of tax payers’ money, who will be paying twice – to build the entire infrastructure and amenities on greenfield land, and to replace lost green space and biodiversity, etc. Existing Green Belt should be retained, with development on brownfield sites prioritised.
- *Has the Council missed other Spatial Strategy options?* Yes. The required housing can be accommodated on brownfield sites and that option should be focused on.

### **Section 3 – Places**

#### **Questions**

- *Have all appropriate placemaking areas been included?* Yes.
- *Should any of the placemaking areas not have been included?* The Green Belt development in Chase Park especially should be excluded. Not only should brownfield sites be prioritised and focused on, but Enfield Chase and Trent Park are repeatedly mentioned as areas that must be protected.
- *Comments on placemaking areas?* No comments on most of the areas, but:
  - Meridian Water – it is unacceptable that Green Belt is being sacrificed for housing when, in spite of the Meridian Water project having been in the making for a decade already, only half of the 10,000 homes planned on this brownfield site will be delivered over the next 20 years.
  - Rural Enfield – the aspirations are laudable, however, it is contradictory to emphasise green space and re-wilding when 20% or more of the Green Belt in north of the borough will be concreted over.
  - Crews Hill – the Plan is vague on details of how a sustainable development will be realised in this isolated location. The required investment in transport links and amenities is vast but unspecified, and the risk of resulting car use, pollution and pressures on neighbouring areas is significant.
  - Chase Park – the proposals for this location are highly questionable. The site is part of the Green Belt and, in spite of the Plan repeatedly discussing the importance of Enfield Chase and Trent Park as an area to be treasured and protected, the Plan includes 3,000 homes (the developer’s website indicates 5,000) by Trent Park, in addition to the hundreds of homes already under construction. The location is wrong, not just for environmental reasons but also because traffic will all be directed to the A111, which is already congested (and which will already get worse with the development at Cockfosters station).

## **Section 4 – Sustainable Enfield**

- Strategic Policy SP SE1 is silent on the Natural Environment, even though that is one of the seven pillars of the Council's Climate Change Action Plan 2020. The surprising absence of this key consideration is also reflected in the proposal to build a quarter of all new homes on Green Belt land.
- Strategic Policy DM SE8 requires new developments to avoid and reduce the risk of flooding and not increase flood risk elsewhere. The policy must be expanded so as to require flood risk mitigation to be enhanced for existing developments, as the cumulative effects of decades of inappropriate development and climate change have elevated flood risks to an unacceptable level.

### Questions

- *SE1- Are there other measures to tackle the climate emergency?* The policy fails to mention the Natural Environment, biodiversity and green space. This omission may explain why the Plan considers it appropriate to build over 20% of the Green Belt land in the north of the borough, thus raising significant question marks over the green aspirations of the Plan.
- *SE2 - Are there other considerations to support sustainable design and construction?* The mere requirement to provide a statement (on sustainable design and construction) is pointless. Quantifiable limits and measurements that the actual construction must comply with are instead required.
- *SE3 - Is this the right way to reduce emissions and help the circular economy?* Brownfield sites must be prioritised over greenfield sites.
- *SE4- Is this the right approach to reduce space heating demand and energy consumption?* No comment.
- *SE5 - Is % over Part L the right measure for reducing greenhouse gas emissions?* No comment.
- *SE5 - Is this the right approach to incentivise on-site renewables?* No comment.
- *SE6 - Is this the right approach to manage the impacts of renewable energy development?* No comment.
- *SE7 - Does the policy set out a robust framework for managing heat risk?* No, the policy again highlights why development on brownfield land before greenfield and Green Belt is required.
- *The same questions as above should have been asked for policies SE8-10.*

## **Section 5 – Addressing equality, health and wellbeing**

### Questions

- *How best can the Plan provide high quality life and well-being?* This fundamental question should have been reviewed and addressed before the Plan was put out to consultation.
- *Are there specific education issues to be addressed in new developments?* The availability of all levels of education within easy reach without car usage, as well as the impact on existing pupils/parents, should have been assessed for all major proposed developments. For example, the proposed 160 new homes in Hadley Wood will cause major problems as there is no facility within walking distance for children under 2 years, no senior school and no sixth form college. There is only a single entry, oversubscribed primary school in the area, and the lack of good local public transport links will increase car use and pollution.

- *How should health issues be addressed?* As with education, the available of healthcare services should have been assessed for all major developments. For example, there are no healthcare services at all in Hadley Wood, with the nearest being mostly an hour or more away by public transport.

### **Section 6 – Blue & green Enfield**

- No questions are listed at the end of this Section.
- Strategic Policy SP BG1 – developments must ensure that “development protects and enhances significant ecological features” – how is that defined? Areas of Special Character, which includes the Hadley Wood site, must be protected.
- Para 6.1.5 states that “Enfield’s long-term ambition is to become the greenest borough in London”. This ambition is reflected throughout the ELP, however, the statements are entirely undermined by the proposals to build a quarter of all new housing on Green Belt land.
- Strategic Policy SP BG 2 must also protect Areas of Special Character to ensure consistency with NPPF paragraphs 101 and 174.
- Strategic Policy SP BG3 is significantly weaker than the London Plan which, in para 8.6.6 states that “this approach does not change the fact that losses [of biodiversity] should be avoided and biodiversity offsetting is the option of last resort”.
- Para 6.5.1 is looser than/inconsistent with the NPPF wording. For example, Enfield state that some Green Belt development that is not inappropriate “includes some forms of development on previously developed sites, limited infilling within existing settlements”. NPPF para 149.g) specifies that such developments must “not have a greater impact on the openness of the Green Belt than the existing development, or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need”.
- Policy DM BG 7 does not differentiate between the different types of watercourses. Greater protection should be provided to Main Rivers versus, for example, Ordinary Watercourses.
- Policy DM BG 8 provides weaker protection for trees than the London Plan Policy G7 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”.

### **Section 7 – Design & character**

- No questions are listed at the end of this Section.
- Table 7.1 should include the view from the A111/Stagg Hill as an important local view. Below is an example.



- Policy DM DE6 on tall buildings should stipulate the definition. The Character of Growth report explains that, although London Plan Policy D9 stipulates tall buildings must be no less than 18 metres or 6 storeys, that is measured to the floor of the top storey. Enfield’s 21m/7 floors overall height therefore makes sense, but the definition must be detailed in the policy to avoid misunderstandings.
- Policy DM DE6 must also 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”.
- **Policy DM DE11, section 1, omits the Hornbeam Hills South from the list of areas of landscape character. The area was included in the 2013 Area of Special Character Boundary Review, as well as the South Hertfordshire Landscape Character Assessment, and the Policy must be amended to reflect this.**

### **Section 8 – Homes for all**

- Strategic Policy SP H2 requires Green Belt land developments to provide 50% affordable housing, whereas other major housing developments only require 35%.
- Para 8.2.9 appears to justify this with the comment that rural areas of the Borough have high house prices and very limited supply of affordable homes. The forced requirement to provide affordable housing, without a commensurate investment in improvement of amenities, such as public transport, healthcare, schooling, shopping and leisure is nonsensical and create problems.
- The high proportion of affordable housing on Green Belt developments will add to the inefficient use of this valuable land. A report by The Countryside Charity highlights that “housing development in the Green Belt is just 14 dwellings per hectare, far below that needed to support sustainable communities” and a significantly less efficient land use than the 31 affordable dwellings per hectare outside the Green Belt (<https://www.cpre.org.uk/wp-content/uploads/2019/11/Space to Breathe.pdf>).

- The high proportion of affordable housing, which by definition is higher density and lower cost, conflicts with Strategic Policy SP BG5 requires the siting, scale, height and bulk of developments adjacent to the Green Belt to be compatible with the primary aim of preserving the openness of the Green Belt. They must also provide high standards of design and landscaping etc. DM RE2 furthermore requires that these developments must not have a detrimental impact on the visual amenity and landscape of the Green Belt, maintain view to the Green Belt from urban areas, and improve the character of the Green Belt and landscape through tree-planting etc.
- We are told by developers that the above will result in the Green Belt developments comprising affordable housing and luxury properties. This development will therefore not provide a broad range of properties and won't address the unmet local need (for downsizing opportunities and sheltered housing for existing residents, as well as housing for children who grew up locally).
- Para 8.4.6 refers to the Enfield Character of Growth Study to identify areas that are “positioned to facilitate an uplift in small housing development”. That document <https://new.enfield.gov.uk/services/planning/character-of-growth-report-stages1.2.3a-planning.pdf> is incomprehensible and could be construed as having worked backwards from desired outcomes. For example:
  - Pg 13 – Conservation Areas are generally recommended to see ‘Limited’ change and it is unclear how the final results on pg 21 recommend ‘Medium’ change.
  - **Pg 15 - PTALs are noted but overridden “to account for inaccuracies within PTAL”. This is inconsistent with the London Plan and no supporting evidence is provided. The arbitrary manipulation of results is unacceptable.**
  - Pg 16 – no legends are provided for the maps and no explanation is provided for the “area of large scale coordinated change” map, which appears to suggest that the entire area around Hadley Wood is recommended for such large scale change even though the area has a PTAL0-1 and very limited amenities and includes Green Belt land.
  - Pg 18 - the General Value Map is incomprehensible, partly as it uses only three colours for 22 different parameters.
  - Pg 27 –walking distances of 400m/800m are taken as the crow flies, which ignores that pavements and paths do not follow straight lines, and disregards gradients.
  - Pg 28 – the legend incorrectly states that the height (21m) is the London Plan definition. It is Enfield’s definition, which converts the London Plan definition to the top of the building (as opposed to the floor of the top storey).
- Para 8.4.8 is another example of the Council’s green credentials and ambitions appearing insincere. The statement that small housing development must not have an unacceptable adverse impact on biodiversity and green infrastructure is undermined by the statement that harm is acceptable as long as the impacts are minimised and mitigated, for example through the use of a green roof and birdboxes, and further encourages aggressive plans by opening the next para with “small site development forms a significant part of the Local Plan housing trajectory”.

#### Questions

- *Should target % for affordable housing in policy SP H2 be increased?* As commented above, the 50% threshold for Green Belt developments, vs 35% for other major developments, does not make sense.
- *Should the affordable housing threshold of 10 dwellings on site be applied?* It is not clear what specific policy or section this question relates to.
- *Do you agree with policies H3-9?* See comments on policy H4 (small sites) above.

- *Do you agree with the approach for gypsy and traveller sites (H10)?* The question for feedback is premature and nonsensical as the policy refers to the 'Gypsy and Traveller Local Plan', which is yet to be developed. The needs Assessment in the Evidence Base appears to suggest a requirement for 21 pitches (nil currently provided). This is a material increase from the need for 1 pitch identified in the 2008 needs assessment that is referenced in the latest London Plan, and the pitch requirement appears to reflect a desire rather than need. Furthermore, the Assessment does not discuss how the proposal the needs and interests of the broader community.

### **Section 9 – Economy**

- Para 9.4.1 indicates that 37,000m<sup>2</sup> of additional office floorspace is needed. The comments suggests that 2018 information is used and, in light of uncertainty regarding working practices post-Covid, no decisions should be made based on such stale information.
- Figure 9.1 is a placeholder for a diagram that will show areas of Strategic Industrial Location intensification. This unavailability of this important information is most unhelpful in a consultation process.

### **Questions**

- *E1 – is this the right approach for jobs and business growth?* It is too early to know the economic impact and changes caused by Covid and Brexit. There was no requirement to rush ahead with this Plan (St Albans still operates under a 1994 Local Plan), and for a 20 year plan the Council should have taken its time to understand the requirements.
- *E2 – is this the right approach for jobs and business growth?* Public transport links to important industrial locations is crucial, and should be addressed.
- *E3 – is this the right way to protect industrial businesses?* No comment.
- *E4 - Should new offices in town centres be encouraged?* No. Offices are better situated on the outskirts of urban areas, provided they have good public transport accessibility.
- *E4 – Should the loss of offices be resisted?* No. Working practices, and thus office requirements, change over time. Furthermore, the office market will be further impacted by Covid and Brexit. Abandoned offices should be used to address the housing shortage instead.
- *E5 – Do you support intensification to make better use of industrial areas?* Yes, provided the infrastructure is appropriate and the impact on the locality is acceptable.
- *E5- Should better placemaking and environmental improvements in industrial areas be required?* Yes. The Plan states that the vision is for Enfield to be a nurturing place, a deeply green place and the workshop of London. It would be nonsensical to have a totally different approach for industrial areas.
- *E6 – Is this the right approach for non-designated industrial sites?* No comment.
- *E7 – Is this the right way to support delivery of the required range of workspaces?* Yes.
- *E8 – Do you agree with the draft policy?* It makes sense to require at least a certain proportion of "local labour". However, that term must be defined, and compliance must be verified.
- *E9 – Is this the best way to manage the evening/night-time economy?* No comment.

- *E10 – Do you agree with the draft policy?* In the absence of a definition of “high quality digital connectivity services” the policy carries little weight. If Gigabit connectivity is implied then that should be specified.

### **Section 10 – Town centres & high streets**

- *TC1 – does the policy set the right framework to promote the town centres?* No comment.
- *TC2 – Is this the best framework for supporting the borough’s centres?* No comment.
- *TC3 – How else can the most be made of town centre properties?* Space above shops can also be used for leisure and entertainment ventures.
- *TC4 – Is this the right way of protecting and managing markets?* No comment.
- *TC5 – Is this the right way to encourage meanwhile uses?* No comment.
- *TC6 – Does the framework properly manage the impacts of various types of outlets?* It is unrealistic to require businesses such as food outlets to have no impact on neighbouring properties in terms of noise, smells, light pollution, parking, etc.

### **Section 11 – Rural Enfield**

- *Do you agree with the approach in policies RE1-4?* Yes, however, it is hard to see how these policies can be applied as the Plan proposes construction of thousands of new homes on Green Belt land - by definition neither the views to and from the Green Belt, nor the existing features of landscape, are then maintained.

### **Section 12 – Culture, leisure & recreation**

- *Do you agree with the approach in policies CL1-6?* No comments.

### **Section 13 – Movement & connectivity**

- The Plan states that “Enfield is committed to meeting the Mayor of London’s Transport Strategy objectives” to “achieve an 80% mode share for active and sustainable travel by 2041” through “minimising need to travel through good design and location”.
- Even a massive, and from a cost/benefit point of view unrealistic, infrastructure investment would not allow Hadley Wood residents to do 80% of their journeys by walking, cycling or public transport by 2041. The closest amenities are in Barnet, Potters Bar and Cockfosters, which are all further than the policy’s benchmark of 2km and would involve travel along/on the A111 or A1000.

### **Questions**

- *Do you agree with Policies T1 and 2?* The policies are laudable and make conceptually sense, however, for Hadley Wood, a suburban village in a semi-rural location, the policies are unattainable. Even if funding was available for the massive infrastructure investment that would be required, public transport investment would not be financially viable, distances are too great for walking, and

space lacking for cycling lanes needed to guarantee safety on narrow and busy roads (main locations with amenities require travel on A roads).

#### **Section 14 – Environmental protection**

- Para 14.5 references NPPF para 181, which should read para 185, and ‘agent of change’ is only mentioned in a different context, in para 187.
- *Do you agree with policy ENV1?* Much greater clarity and restrictive wording is required. For example, C.ii) states that “proposals must be designed to minimise the impact of light pollution on adjacent occupiers and natural habitats, biodiversity and on the ecology of watercourses”. Many new developments have very substantial windows and rooflights – one recent example a rear elevation that was 70% comprised of glass, which overlooked a wildlife corridor. Developers will simply argue that the absence of lighting directed away from the property makes it compliant with the need to “minimise the impact of light pollution”.

#### **Section 15 – Delivering & monitoring**

- Para 15.1 refers to neighbourhood plans but the Plan does not appear to indicate how conflicts between the Local Plan and neighbourhood plans are dealt with.
- Strategic Policy SP D1, section 3. Infrastructure can be provided off-site where it is shown to be unviable on-site. This provision should be tightened, so that off-site becomes the rare exception.
- Para 15.4.1 states that the Plan will cover the 15 year period from 2024 to 2039. This wording is inconsistent with the remainder of the Plan, which indicates 20 years from 2019 to 2039.

#### **Questions**

- *How can the Plan be effectively delivered in the face of limited resources?* Policies and rules should be clear and measurable. The Plan’s ambitions should also be altered – for example, the claim to want to be the ‘workshop of London’ smacks of delusions of grandeur, and the target to become ‘the greenest borough in London’ is undermined by wanting to build a quarter of all new homes on Green Belt land. Far greater focus must be placed on brownfield development; for example, it is unacceptable that only half of Meridian Water’s 20,000 homes will be delivered over the course of this 20 year Plan.
- *The second question is a statement, not a question.*
- *What should the priorities for project delivery be?* Climate change will increase costs and change our lives. The Green Belt must therefore be protected, with far greater focus to be placed on brownfield site development.
- *Should CIL tariffs be increased?* Yes. Developers are making millions from housing development and an increased contribution to the future prosperity of the borough is entirely warranted.
- It is not clear why the Policies Map marks the Hadley Wood site as *Housing* rather than *Indicative location for housing-led areas in Green Belt* (<https://new.enfield.gov.uk/services/planning/draft-policies-map-planning.pdf>).
- A comparison with the DMD suggests changes are required to ensure that some issues are addressed:



- DMD 6 – no comparable new policy; although new Policy DM DE13 covers some points, issues such as appropriate density are not covered. This must be addressed.
- DMD 7 – new Policy DM BG6 says garden developments are allowed if “the loss of such space can be compensated and the development has overriding planning benefits”. In practice this will result in all garden developments being approved and this must be changed.
- DMD 8 – although new Policy DM DE13 has similar wording, the insertion of “present and new occupiers” is confusing and it is unclear whether the wording covers properties adjacent or in the locality of the development. This must be amended.
- DMD 11 – new Policy DM DE15 has similar wording, but the insertion of the caveat “where appropriate” before “secure a common alignment of rear extensions” leaves too much to the discretion of the Case Officers and must be removed.
- DMD 11 – new Policy DM DE15 has no maximum angle for single storey extensions, and has 45 degrees for extensions above ground floor. This is materially more lenient than the current 30 degrees for above ground floor and 45 degrees for single storey. The often substantial height of single storey extensions can materially impact daylight and amenity value, and the max 45 degrees should be retained also for single storey extensions, as many boroughs do.
- DMD 43 – new Policy DM DE6 has weaker wording. For example, it refers to other policies, such as those related to heritage assets, without being specific. Wording must be amended in line with DMD 43, i.e. tall buildings are inappropriate in or adjacent to the Green Belt, as well as in or along the views of conservation areas.
- New policy DM DE6 - Figure 7.3 suggests the London Plan definition is 21 metres, whereas the London Plan actually states 18 metres, and Figure 7.4 does not make it clear whether Hadley Wood is deemed an appropriate location for tall buildings (the marker appears to point to HW station, which abuts the Conservation Area – refer to previous point). These points must be addressed.
- DMD 45 – parking spaces do not appear to be covered in the new policies? This must be addressed.
- DMD 61 – drainage strategies do not appear to be explicitly covered, with para 4.8.12 containing materially weaker wording than the DMD, as it merely states that development proposals “should” provide a sustainable drainage strategy”. Wording to be changed to “must”.
- DMD 68 – new Policy SP ENV1 has materially weaker wording, as it merely requires mitigation and minimising the effects of noise or light pollution. This wording must be strengthened.
- DMD 78 – new Policy SP BG1 has materially weaker wording, as it merely requires developments to contribute to the blue & green network, vs the current statement that developments along wildlife corridors will only be permitted if they protect and enhance the corridor. Similar weakening of nature conservation and ecological enhancements. Wording must be strengthened.
- DMD 80 – new Policy DM BG8 has materially weaker wording, as it merely says that developments that involve harm to trees will be “resisted”, as opposed to the current “refused”.
- DMD 84 – the draft Local Plan does not have an equivalent clause, and the removal of the protection given to “Areas of Special Character” is presumably to allow the release of Green Belt land for development in Hadley Wood and Chase Park. The current safeguards of DMD84 must be retained.

### 13. Conclusions

- ❖ The draft Local Plan targets a minimum of 1,246 new homes p.a. Even though that represents a reduction of a third compared with the 1,876dpa envisaged in the 2018 consultation document, the Plan proposes to build a quarter of all new homes on current Green Belt land. That is unacceptable.
- ❖ Furthermore, the Plan indicates that the housing target may be revised as high as 4,397 new homes p.a. but the census details that are to be released shortly may indicate a lower requirement. Until the number has been finalised no decisions on Green Belt release should be made, especially since, in the absence of a settlements hierarchy, this Green Belt land could be developed before brownfield sites have been used.
- ❖ Site SA45 was only included at the insistence of the high profile landowner. The draft Plan and supporting documents fail to evidence the "exceptional circumstances" to justify the release of the site, or the alternatives considered to meet the OAN that could result in no or a lesser degree of harm to the Green Belt and/or would cause less harm when considered against all the other wider policy considerations set out in the NPPF in respect of the need to achieve sustainable development.
- ❖ It is inconceivable that, for example, Meridian Water, under discussion for over a decade, cannot provide 160 homes when the 20 year plan only includes 5,000 of the 10,000 homes planned for this brownfield development.
- ❖ There is no indication that the Council has complied with the Duty to Co-Operate and the proposals will exacerbate rather than reduce the negative effects of Climate Change.
- ❖ The Plan uses a highly questionable and arbitrary approach to select site SA45 for development. For example, the Character & Growth Report overrides the PTAL (1a/b for Hadley Wood) to the equivalent of PTAL 4 for all sites within 800m of any station, without providing supporting evidence. Further, local amenities and harm to heritage assets are not considered for Suitability, the Area of Special Character designation has been dropped and carbon sequestration has been ignored.
- ❖ In order to meet the OAN shortfall the Council's primary focus should be on the identification of sites outside the Green Belt. If the release of additional sites is considered necessary, the Council should adopt a sequential approach, identifying and releasing those sites which cause the lowest degree of harm first, consistent with a stated settlements hierarchy strategy.
- ❖ Procedural oversights, most notably with respect to the lack of appropriate consultation with the Hadley Wood Neighbourhood Planning Forum, render the Regulation 18 document questionable.
- ❖ Breaches of, inter alia, the London Plan and NPPF undermine the Plan, not only with respect to the Green Belt release but also with the broader intensification (building density and height) in an unsustainable location.
- ❖ Hadley Wood is not a suitable location for sustainable development without major investment to

improve the infrastructure and amenities. Enfield should follow the example of, for example, LB Bexley, who establish sustainable development areas based on 400m instead of 800m if there is only a 'local shopping area', and measure the distance from the stations based the actual roads and footpaths rather than "as the crow flies".

Given the above we believe there is no justification for:

- the release of site SA45 in Hadley Wood;
- the intensification on small sites that are located within an 800m radius of the Hadley Wood railway station;
- a range of other proposed policies and measured, as discussed in the body of this submission.

## **Hadley Wood Neighbourhood Planning Forum**

**1-7 Crescent East**

**Hadley Wood**

**EN4 0EL**