

Housing

Executive Summary

KEY POINTS RAISED	
1.	The Regulation 18 Local Plan includes broad local housing need targets of between 1,246dpa and 4,397dpa. Given the vast differences in housing target figures, it is deemed entirely unjustifiable to find supply which aligns with the higher figure (the rolled over Standard Methodology figure [as set out in the PPG]), as there is no robust evidence to justify why even the lower policy-off figure of 1,246 dpa has been considered, as when taking into account likely constraints, a more realistic figure of around 500dpa was ascribed within the GLA SHLAA (2017).
2.	To achieve the housing need figure of 1,246dpa, the Regulation 18 Local Plan factors in the removal of large tracts of LB Enfield’s Green Belt, despite the fact that existing Green Belt policies within both the London Plan and NPPF concludes that only in ‘exceptional circumstances’ can the removal of the Green Belt be justified.
3.	The Regulation 18 Local Plan has failed to comply with Policy H1 (Increasing Housing Supply) of the London Plan, as it is evident that LB Enfield Council has not adequately assessed the development potential from alternative sources of supply sources, including car parks, low density retail parks and supermarkets, surplus utilities and public sector owned sites – particularly LB Enfield Council’s own freehold sites (with the exception of Meridian Water) and industrial sites. The Council has not been proactive in its approach to identifying and seeking to exhaust all potential sources of land within existing built-up areas.
4.	The LB Enfield Capacity Study Site Identification (2020) omitted publicly owned sites which were in active alternative uses. This is a clear dereliction of duty by LB Enfield Council, as it has failed to objectively assess all sources of supply. As such, the Regulation 18 Enfield Local Plan conflicts with both paragraph 120d) of the NPPF and Policy H1 (Increasing Housing Supply) of the London Plan, as LB Enfield Council has not supported the development of underutilised-land and buildings.
5.	The LB Enfield Capacity Study Site Identification (2020) failed to include vacant sites which are not in the development pipeline in the overall supply assessment. As highlighted below, if LB Enfield Council were to bring back into use just 10% of existing vacant stock, this would equate to an additional supply of approximately 300 dwellings per annum. As such, the Regulation 18 Local Plan does not accord with Policy H1 (Increasing Housing Supply) as it does not encourage development on other appropriate windfall sites.
6.	The LB Enfield Capacity Study Site Identification (2020) did not 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 large omission conflicts with the Mayor of London’s Draft Module A Good Quality Homes for All Londoners Guidance (2020) ¹ , which promotes the intensification and co-location of uses and the Mayor

¹ https://ehq-production-europe.s3.eu-west-1.amazonaws.com/365845364a318deac2b5f56f390a687e14c3c922/original/1602148718/Module_A_-_draft_for_consultation_-_October_2020.pdf_3ec1edb6afdf45e674ee1d7cda3?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-

	of London’s Draft Industrial Intensification Primer (2017) ² which acknowledges the growing pressure on London’s industrial land and states that consideration must be given as to <i>‘how industrial areas can be used more intensively and how industry can be integrated in residential areas’</i> .
7.	The SHLAA assessment for the ‘Land between Camlet Way and Crescent Way’ (site reference: COC8) is considered to be invalid on the basis that inadequate information has been provided. It is also known that the ‘Land between Camlet Way and Crescent Way’ site has a long lease (of approximately 8 years) remaining and therefore this site cannot be deemed essential in helping to fulfil housing objectives.
8.	There is insufficient viability and availability evidence available for the ‘Land between Camlet Way and Crescent Way’ (COC8) site and therefore there is no robust justification as to why this site has been identified as a site for development. In addition, the uncertainty regarding local housing requirements raises serious questions as to why LB Enfield Council have pre-emptively supported the release of Green Belt for development.
9.	Site allocation SA 45 ‘Land between Camlet Way and Crescent Way’ is located in a unsustainable location. Proximity to a station alone is not sufficient to support allocation of a site. Services are limited and commuting patterns show that most residents in employment travel by car. With no improvement to services in the pipeline, the presence of the station will contribute little to the sustainability of development. As such, the Regulation 18 Local Plan conflicts with paragraph 104a) of the NPPF, as the potential impacts of development on transport networks have not been adequately addressed.
10.	The allocation in Hadley Wood is relatively small and would not support much by the way of community facilities or other infrastructure. Coupled with limited infrastructure in Hadley Wood at present, and no planned investment in provision of improved services or facilities, it is not an appropriate place to grow. It is therefore recommended that LB Enfield Council should prioritise and accelerate the delivery of 10,000 new homes on the Meridian Water site, as only half of that number has been included in the 20-year Plan, even though the site has been subject to discussions for over a decade. Meridian Water would be the optimal location for the additional growth due to its scale of growth and the existing and planned levels of infrastructure located on-site.

Policy Context

National Planning Policy Framework

- 1.1. Chapter 5 of the National Planning Policy Framework (NPPF) seeks to ensure that a sufficient supply of homes are delivered. Of relevance to the Regulation 18 Enfield Local Plan, paragraph 61 of the NPPF states the following:

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² <https://www.london.gov.uk/sites/default/files/industrialintensificationprimer.pdf>

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”

- 1.2. Paragraph 68 of the NPPF, which addresses how land for homes should be identified, states that:

“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”.

- 1.3. Chapter 11 of the NPPF is also of particular significance as, as stated in paragraph 119, *“planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses [...]”*. Of note, paragraph 120 stipulates that planning policies and decisions should:

“a) encourage multiple benefits from both urban and rural land, including through mixed use schemes [...]

b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation [...]

c) give substantial weight to the value of using suitable brownfield within settlements for homes and other identified needs [...]

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting spaces above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure, and

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the new development would be consistent with the prevailing height and form of neighbouring properties and overall street scene [...]”.

London Plan

- 1.4. The recently adopted London Plan (2021) ascribes LB Enfield with a ten-year housing target (net housing completions) of 12,460 homes over the period 2019/20 to 2028/29.
- 1.5. Policy H1 (Increasing Housing Supply) of the London Plan details how London boroughs can achieve their respective ten-year housing targets. This includes policy requirements such as *“allocating an appropriate range and number of sites that are suitable for residential mixed-use development and intensification”* and *“encouraging development on other appropriate windfall sites not identified in Development Plans”*. Central to this, clause (2) of Policy H1 (Increasing Housing Supply) states the following:
- “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 station³ or town centre boundary⁴*
 - 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 (see Policy H2 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.”*
- 1.6. The policy also recommends that boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.
- 1.7. 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”*.

³ Tube, rail, DLR and tram stations

⁴ District, major, metropolitan and international town centres – for the purposes of Policy H1 (Increasing Housing Supply) Part B2a, the 800m distance is measured from the edge of the town centre boundary

Discussion

Housing Need

- 1.8. As highlighted in Table 9.1 of the LB Enfield Local Housing Needs Assessment (LHNA) (2020)⁵ (Figure 1 below), there are discrepancies between the annual housing need figures established through both the London Plan and the Government’s Standard Method. It is clear that there remains a great deal of uncertainty regarding post-2029 annual housing need figures.

Table 9.1 Range of potential annual housing need figures and targets for Enfield Borough	
Need - Standard method – August 2020 consultation version	2,213
Need - Standard method – 2019 PPG version, using 2016 London Plan target to derive the cap	1,117
Need - Standard method – 2019 PPG version, using 2019 Intend to Publish London Plan target to derive the cap	1,744
Requirement - London Plan Alterations (2016) target	798
Requirement - Intend to Publish Draft New London Plan (2019) target	1,246
Requirement - Draft New London Plan (2019) previous target	1,876
Requirement - Government-provided target based on revised standard method	Unknown
Requirement - Mayor of London provided target, based on Government target and redistributed based on Greater London spatial priorities	Unknown

Figure 1: Range of annual housing need figures for LB Enfield (Source: LB Enfield LHNA, 2020)

- 1.9. As summarised within the Enfield Housing Numbers Paper (2021)⁶, 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 all a product of the small sites element of the GLA SHLAA (2017) needs assessment.

⁵ <https://new.enfield.gov.uk/services/planning/enfield-local-housing-needs-assessment-full-report-2020-planning.pdf>

⁶ <https://new.enfield.gov.uk/services/planning/enfield-housing-numbers-paper-2021-planning.pdf>

- 1.10. With the above in mind, 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)⁷ 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 also been introduced by the Planning White Paper which puts forward proposals for 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”.

- 1.11. 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 concludes that only in ‘exceptional circumstances’ can the removal of the Green Belt be justified. 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]⁸). 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 uses⁹.
- 1.12. In the absence of any justifiable local housing need figure, of which there is no such figure for Enfield at present, the Regulation 18 Local Plan’s strategy of removing 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 (please see ‘lack of robust urban capacity evidence’ section below) 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: a flagship scheme that has been in planning and development for well

⁷ <https://new.enfield.gov.uk/services/planning/enfield-strategic-housing-land-availability-assessment-shlaa-2020-planning.pdf>

⁸ <https://www.planningresource.co.uk/article/1721745/why-government-plans-centrally-issued-housing-targets-look-likely-watered-down>

⁹ <https://www.planningresource.co.uk/article/1721745/why-government-plans-centrally-issued-housing-targets-look-likely-watered-down>

over a decade, but where delivery has been slow. Development here should be expediated, rather than releasing Green Belt sites. This further supports the view that the removal of Green Belt land to accommodate local housing is not a justifiable approach as there is insufficient evidence to suggest that all other sources of supply have been exhausted.

- 1.13. 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.

Lack of robust urban capacity evidence

- 1.14. It is considered that the Regulation 18 Local Plan does not comply with either the NPPF nor London Plan on the grounds that it has not sufficiently assessed all potential opportunities and sources of housing supply. This is evidenced by Table 2 of the LB Enfield Capacity Study Site Identification (2020)¹⁰ which clearly only assesses ‘known sites’ (i.e., sites currently within the planning system).
- 1.15. Whilst it is recognised that the LB Enfield Capacity Study Site Identification (2020) undertook a thorough review of sites in the planning system, the Regulation 18 Local Plan has failed to comply with Policy H1 (Increasing Housing Supply) of the London Plan, as it is evident that LB Enfield has not adequately assessed the development potential from other sources of supply sources, including car parks, low density retail parks and supermarkets, surplus utilities and public sector owned sites and industrial sites. In the absence of robust capacity analysis and consideration of how delivery of such sites might be facilitated, the proposed removal of LB Enfield’s Green Belt cannot be justified, as it is evident that the justification of unmet local housing need cannot be deemed an ‘exceptional circumstance’ to warrant the removal of Green Belt. Whilst Enfield has prepared a ‘Capacity Study’ there is nothing in this to support the view that the Council has been proactive in seeking to identify and bring forward potential sites for development beyond those that are effectively already known and form part of the existing development pipeline. As such, this approach does not comply with paragraph 141 of the NPPF as it cannot be proven that the strategic policy-making authority has *“examined fully all other reasonable options for meeting its identified need for development”*.

¹⁰ <https://new.enfield.gov.uk/services/planning/enfield-capacity-study-site-identification-2020.pdf>

Publicly Owned Land

- 1.16. To evidence the above point further, the LB Enfield Owned Land and Buildings Register¹¹ 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. The breakdown of these spaces is presented in Figure 2 below. Interestingly, 96.9% of spaces listed are freehold, with the remaining 3.1% defined as leasehold. Whilst further site details have not been made public by LB Enfield Council, it is clear that the Regulation 18 Local Plan has failed to assess the potential longer-term untapped supply from these LB Enfield Council-owned (publicly owned) sites, as the LB Enfield 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”*.
- 1.17. This is a clear dereliction of duty by LB Enfield Council, as it has failed to objectively assess all sources of supply. In the case of LB Enfield Council-owned sites, this methodological error has resulted in the omission of 96.1% of LB Enfield Council-owned residential and non-residential stock, which is currently registered as ‘leased out’, ‘leased in’, ‘owner occupied’ or ‘other’ (i.e., stock which is not vacant). This oversight conflicts with recently published draft ‘Good Homes for All Londoners (Module A) by the Mayor of London (2020)¹², which states that the ‘physical characteristic’ question highlighted (“what are the uses of existing buildings and external spaces?”) is classified as a ‘capacity factor’ but does not in any way preclude sites with various active uses from being considered for optimisation and/or intensification. Indeed, earlier good practice guidance on production of urban capacity studies prepared by Urbed on behalf of the DETR (now MHCLG) entitled ‘Tapping the Potential’¹³ states that *“it will also be important not to reach premature conclusions about potential. As many sites as possible and all options should be considered initially”*. Although acknowledged as being dated, there is a lack of more recent advice on urban capacity at the national level, and the guidance in Tapping the Potential remains relevant, setting out ways in which development in urban areas might be maximised.
- 1.18. As such, the Regulation 18 Enfield Local Plan conflicts with both paragraph 120d) of the NPPF and Policy H1 (Increasing Housing Supply) of the London Plan, as LB Enfield Council has not supported the development of underutilised-land and buildings - particularly through the redevelopment of public sector owned sites. This error has, in turn, led to artificially heightened concerns regarding urban capacity

¹¹ https://new.enfield.gov.uk/services/property-and-economy/property-information-land_and_buildings_open_data.csv

¹² https://ehq-production-europe.s3.eu-west-1.amazonaws.com/365845364a318deac2b5f56f390a687e14c3c922/original/1602148718/Module_A_-_draft_for_consultation_-_October_2020.pdf_3ec1edb6afdf45e674ee1d7cda3?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAIBJCUK4Z04WUUA%2F20210810%2Ffeu-west-1%2Faws4_request&X-Amz-Date=20210810T080038Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=68d5b1d132941e9680ba0e27b82ea357cbfaecb8086117d7ec165b25df385cfb

¹³ <http://urbed.coop/sites/default/files/Tapping%20the%20Potential%20Report.pdf>

within LB Enfield, which could to some degree be addressed through the intensification or redevelopment of publicly-owned sites – many of which are freehold and would therefore not be subject to land ownership constraints, thus improving the likelihood that these sites are indeed suitable for development.

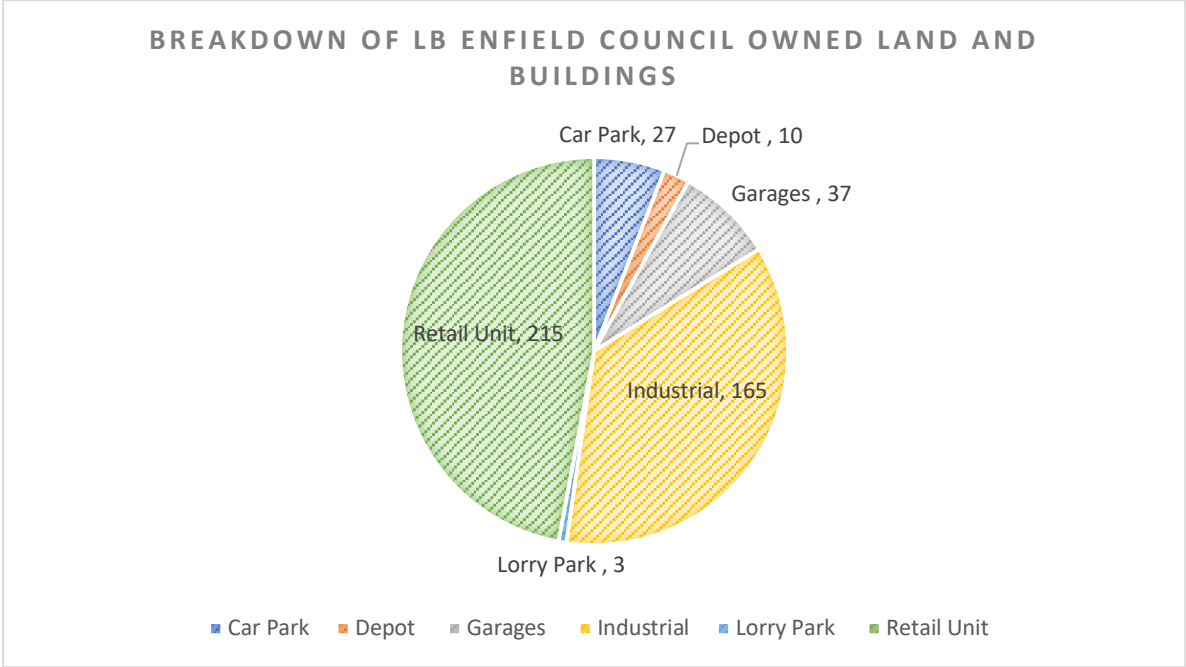


Figure 2: Breakdown of LB Enfield-owned land and buildings (source: LB Enfield Owned Land and Buildings Register, undated)

Vacant Properties

1.19. It is unclear whether other sources of supply, such as vacant dwellings, have been assessed within the LB Enfield Capacity Study Site Identification (2020). No reference was made to vacant housing stock within the main body of the LB Enfield Capacity Study Site Identification (2020) however Appendix A (Comparison of Site Sources with the PPG List of Types of Sources and Potential Data Sources) highlights the following (Figure 3):

<p>Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)</p>	<p>Local authority empty property register English Housing Survey National Land Use Database Commercial property databases (eg estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers</p>	<p><i>Active engagement with LBE Property, Development management, merchant water etc</i> Sites from all categories can fall into this category: Enfield Planning Applications (1948 to 6 March 2020) The returns from Enfield's 2019 - 2020 Call for Sites and Call for Small Sites (including additional consultation with relevant LBE stakeholders regarding Council estates with capacity for intensification and Council owned land either surplus or likely to become surplus over Plan period) Public sector land, including that owned by GLA and TfL, either surplus or likely to become surplus over Plan period, in addition to that identified through the Call for Sites (identified through direct consultation with 'GLA family') Sites currently at pre-application stage Existing Development Plan Allocations and Opportunity Sites not yet completed Sites with development briefs and/or developer masterplans The most recent London Strategic Housing Land Availability Assessment (SHLAA) 2017 Call for Sites Submission by Enfield Road Watch and CPRE and their "Space to Build Enfield" report The GLA's London Development Database Enfield Annual Monitoring Reports Enfield Housing Trajectory Enfield Brownfield Land Register Sites identified through Neighbourhood Plans in Enfield</p>
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Figure 3: PPG (grey) vs. LB Enfield Capacity Study (blue) data sources for vacant dwellings (Comparison of Site Sources with the PPG List of Types of Sources and Potential Data Sources) (source: LB Enfield Capacity Study Site Identification)

1.20. The above (right column) reveals that the LB Enfield Capacity Study Site Identification (2020) has only assessed vacant dwellings which are currently in or were previously in the planning pipeline. Whilst it is acknowledged too that 'Enfield Annual Monitoring Reports' are referenced; the latest Enfield Annual Monitoring Report (2019)¹⁴ merely states how many vacant dwellings there are in LB Enfield and fails to provide a strategy for bringing these back into use. As such, it cannot be claimed that LB Enfield Council has sufficiently assessed the potential additional untapped housing supply from existing vacant dwellings within the borough. Furthermore, the Ministry of Housing, Communities and Local Government's latest Vacant Dwellings data (2020)¹⁵ states that as of 2020 there were 3,103 vacant dwellings in LB Enfield, of which 984 were classified as 'all long-term vacant dwellings'. Concerningly, it is also unclear as to whether vacant dwellings have been included as part of the windfall assessment work, as the LB Enfield Capacity Study Site Identification (2020) makes numerous references to the windfall analysis in 'Module 6', however Module 6 is not included as part of the Study. As such, the Regulation 18 Local Plan does not accord with Policy H1 (Increasing Housing Supply) as it does not encourage development on other appropriate windfall sites.

Industrial Intensification/Mixed Use Developments

1.21. A key flaw of the LB Enfield Capacity Study Site Identification (2020) is that it failed to adequately assess the housing supply potential of industrial areas. Whilst the LB Enfield Capacity Study Site Identification (2020) did state that the Study took

¹⁴ <https://new.enfield.gov.uk/services/planning/annual-monitoring-report-and-housing-trajectory-2019-planning.pdf>

¹⁵ <https://data.london.gov.uk/dataset/vacant-dwellings>

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) 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.”

- 1.22. This omission conflicts with the Mayor of London’s Draft Module A Good Quality Homes for All Londoners Guidance (2020)¹⁶, which promotes the intensification and co-location of uses and the Mayor of London’s Draft Industrial Intensification Primer (2017)¹⁷ 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.
- 1.23. 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”*.

¹⁶ https://ehq-production-europe.s3.eu-west-1.amazonaws.com/365845364a318deac2b5f56f390a687e14c3c922/original/1602148718/Module_A_-_draft_for_consultation_-_October_2020.pdf_3ec1edb6afdf45e674ee1d7cda3?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAIBJCUK4Z04WUUA%2F20210812%2F20210812%2Fus-east-1%2Faws-logs-4-request&X-Amz-Date=20210812T141757Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=ece38483d0e7397c3db7a041e4211d8b6ff7c88a426bf4fca2b93fa1b6e07253

¹⁷ <https://www.london.gov.uk/sites/default/files/industrialintensificationprimer.pdf>

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

SHLAA Entry

- 1.24. It is considered that the SHLAA assessment for the 'Land between Camlet Way and Crescent Way' (site reference: COC8) to be invalid on the basis that inadequate information has been provided. The 'Land between Camlet Way and Crescent Way' site (COC8) is the only entry within Appendix D (Full Assessment of Potential Sites) of the LB Enfield SHLAA (2020)¹⁸ with empty table cells. Despite a lack of any information on 'achievability' (including details on 'market factors', 'cost factor dependencies' and 'site and delivery factors'), the findings of the individual assessment state that the site is 'potentially developable subject to confirming viability and review of policy constraints'. This ill-informed summary is based on evidence which has not in any way taken account of potential feasibility and viability constraints. In addition, the SHLAA fails to consider heritage assets and Areas of Special Character as 'Suitability' indicators and lists "access to local services" under 'Site Information', not 'Suitability'. As such, this evidence conflicts with paragraph 31 of the NPPF, as it is clear that the Regulation 18 Local Plan evidence is not "*adequate or proportionate*", nor does it "*take into account relevant market signals*".

Phasing

- 1.25. 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. However, it is known that the site has a long lease (of approximately 8 years) remaining and therefore this site cannot be deemed essential in helping to fulfil housing objectives.
- 1.26. 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)¹⁹ states that (our emphasis added) "*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*

¹⁸ <https://new.enfield.gov.uk/services/planning/enfield-strategic-housing-land-availability-assessment-shlaa-2020-planning.pdf>

¹⁹ <https://cornerstonebarristers.com/news/nppf-definition-should-deliverable-not-closed-list/>

definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available."

- 1.27. This statement confirms that in order for a site to be deemed to be included as part of the SHLAA sifting process there must be compelling evidence to warrant its inclusion. As explicitly stated above, in the absence of any clear housing targets, it is entirely unjustifiable for LB Enfield to allocate sites within the Green Belt within the latter stages of the Plan, as it is not yet known whether there is an objective need for this housing. This is particularly the case for site allocation 'Land between Camlet Way and Crescent Way' (COC8), as there is no information relating to the site's availability nor viability and therefore no real indication as to whether the site is truly deliverable. As such, Hadley Wood Association oppose the allocation of the 'Land between Camlet Way and Crescent Way' (COC8) and seek its removal in future versions of the Enfield Local Plan.

Sustainable Development Concerns

- 1.28. Hadley Wood is identified as an opportunity for growth by Enfield given that it is within an 800m catchment of a station. This is despite Hadley Wood falling within the three lowest Public Transport Accessibility Level (PTAL) scores (0, 1a and 1b). As highlighted in the Walkability Index (produced by Space Syntax on behalf of the Hadley Wood Association and attached to this representation), Hadley Wood also has a 'below average' walkability score in comparison with other areas within the LB Enfield. This low score was attributed to a network of disconnected streets, large urban blocks that increase walking distances, and a narrow mix of land uses that creates few reasons to walk locally.
- 1.29. As shown in Figure 4, existing aggregated data highlights that travel by car and van is the main method of travelling to work within Hadley Wood. In the area closest to Hadley Wood Station, travel by rail and car or van were joint most popular methods of commuting. In the absence of any information relating to potential transport improvements in Hadley Wood, it is evident that site allocation SA 45 (Land between Camlet Way and Crescent Way) would lead to increased pressure on the road network. As such, the Regulation 18 Local Plan conflicts with paragraph 104d) of the NPPF, as the Plan has failed to identify the environmental impacts of traffic and transport infrastructure.

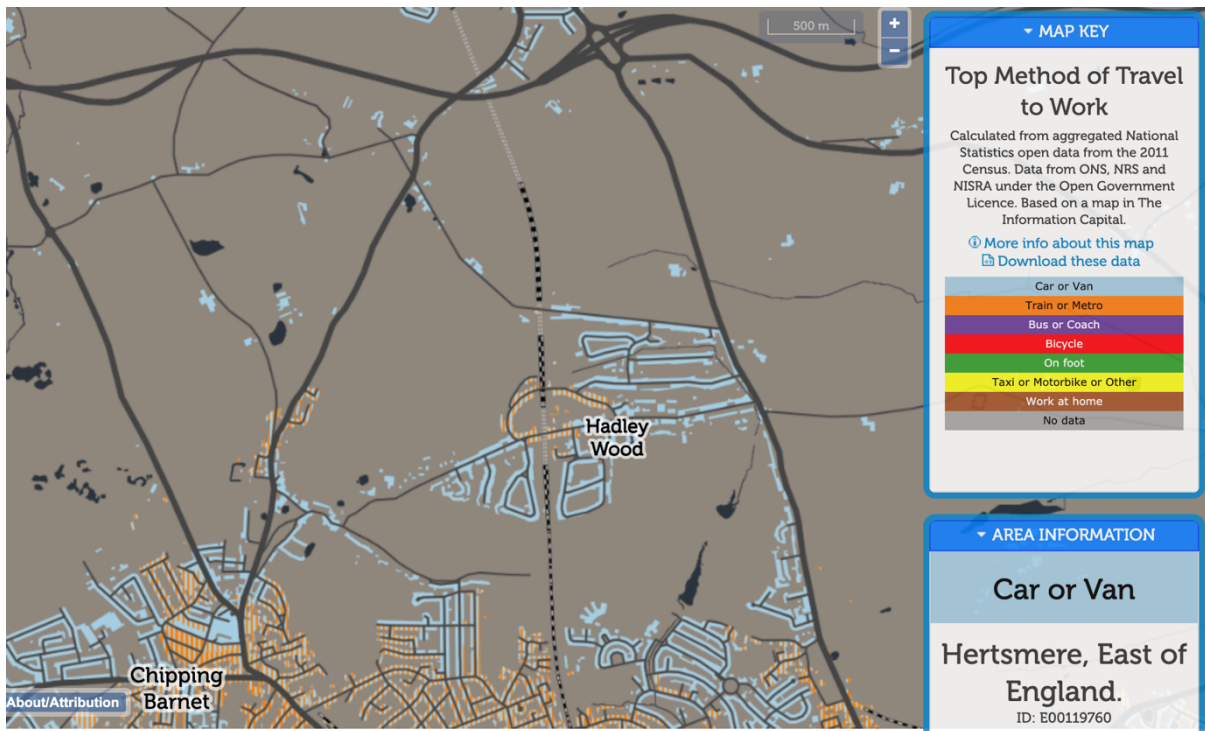


Figure 4: Breakdown of travel to work methods for Hadley Wood (source: Consumer Data Research Centre)

- 1.30. Whilst it is accepted that the London Plan prioritises small sites in close proximity (800m) to railway stations, it is clear that, in Hadley Wood, this does not represent a compelling reason to support growth, with the majority of those residents in employment travelling to work by car rather than train. With no planned investment in services there is no reason to say this pattern will change. Simply targeting growth in a particular location because it is within 800m of a station does not support sustainable patterns of development. Indeed, in responding to the draft London Plan, LB Enfield Council’s own Small research and evidence submitted to the EiP (2019)²⁰ criticised the locational criteria used for small sites, including the 800m catchment of a station, stating that “[LB Enfield Council] queries whether these areas genuinely have capacity for this level of intensification given their particular travel, social and environmental infrastructure requirements”. This is further supported by presentation of a series of case studies that demonstrate why the 800m catchment is unsuitable, and which also highlights impacts on social and community infrastructure from such an approach.
- 1.31. With the above in mind, Hadley Wood station is served by the Greater Northern line, which provides direct services to Moorgate and Welwyn Garden City every quarter of an hour in rush hour and every half an hour in off-peak times. Therefore, southbound trains travelling via Hadley Wood Station only provide services to New Barnet (LB Barnet) and northbound trains only provide services to Potters Bar

²⁰ https://www.london.gov.uk/sites/default/files/ad_75_enfield_small_sites_research_2018_31_january_2019.pdf

(Hertsmere). The Regulation 18 Infrastructure Delivery Plan (2021)²¹ confirms that there will be no significant improvements to this service. This is a serious concern, as the evident lack of public transport infrastructure within Hadley Wood would lead to greater private car use during the work week, which in turn conflicts with paragraph 104a) of the NPPF, as the potential impacts of development on transport networks have not been adequately addressed. This reactive approach also conflicts with Policy D2 (clause C) (Infrastructure Requirements for Sustainable Densities), as additional infrastructure that is proportionate to the development will not be delivered over the Plan period.

- 1.32. Furthermore, the proposed site allocation SA 45 (Land between Camlet Way and Crescent Way) is planned to provide just 160 homes in years 11-15 of the Local Plan. Given that the Regulation 18 Local Plan seeks to remove two large tracts of Green Belt for development in Enfield (at Enfield Chase and Crews Hill), it is evident that the additional removal of land for SA 45 (Land between Camlet Way and Crescent Way) does not constitute sustainable development, as the aforementioned larger allocations are likely to provide considerable levels of infrastructure to support the community. With that in mind, site allocation SA 45 (Land between Camlet Way and Crescent Way) is considerably smaller and is therefore unlikely to trigger relevant thresholds to warrant the provision of new services locally. This in turn could lead to considerable pressures on existing services and public transport in Hadley Wood. As highlighted in the Regulation 18 Infrastructure Delivery Plan (2021)²², it is already noted that areas in the west and south west of the borough “are coming under pressure to accommodate [primary school] pupils due to rising birth rates”. Furthermore, the Regulation 18 Infrastructure Delivery Plan (2021)²³ notes that a key issue is as follows (our emphasis added):

“Public transport throughout the borough is of a poor standard relative to other London boroughs and PTAL levels urgently need improving to support inclusive growth that will benefit some of the borough’s most vulnerable residents, which is all the more important in the wake of the pandemic and its health and economic impacts. The new station at Enfield Chase / Crews Hill will be a crucial part of the approach to meeting this need.”

- 1.33. With the above in mind, it is clear that LB Enfield Council agrees that proposed site allocations within the Enfield Chase and Crews Hill are better placed to accommodate future need.

²¹ <https://new.enfield.gov.uk/services/planning/draft-infrastructure-delivery-plan-lbe-and-inner-circle-2021-planning.pdf>

²² <https://new.enfield.gov.uk/services/planning/draft-infrastructure-delivery-plan-lbe-and-inner-circle-2021-planning.pdf>

²³ <https://new.enfield.gov.uk/services/planning/draft-infrastructure-delivery-plan-lbe-and-inner-circle-2021-planning.pdf>

Landscape

Executive Summary

KEY POINTS RAISED	
1.	Land at Camlet Way and Crescent Way is designated in the current Core Strategy as an Area of Special Character. The Regulation 18 Local Plan Policies Map retains this designation. Designation was recommended as recently as 2013, reflecting the special and unique character of the landscape. There has been no change in circumstances since 2013 to suggest that the nature and quality of the landscape has changed. It remains important and distinctive.
2.	The landscape character of this area is recognised in a multitude of documents, including the Hertfordshire Landscape Character Study, the Enfield Characterisation Study, and Hadley Wood Heritage and Character Assessment. All point to the important setting of the landscape, field pattern and views. In the absence of a landscape character assessment for the 'Land at Camlet Way and Crescent Way' site it is not possible to deduce whether the development of the site would cause harm to the existing landscape. It is therefore unclear as to why the site was deemed deliverable and taken forward for consideration within the Regulation 18 Enfield Local Plan. .
3.	The adopted Enfield Core Strategy seeks to protect Areas of Special Character from development. This is reflected in similar landscape and green infrastructure policies established in the NPPF and London Plan. It should be noted that the Regulation 18 Policies Map correctly highlights where Areas of Special Character are located within the borough, however the Policy Map makes reference to the wrong policy (DE9 [Shopfronts and Advertisement], where Areas of Special Character are covered in draft policy DE11 [Landscape Design]). This error is confusing and should be amended in future iterations of the Plan.
4.	In addition to landscape character and historical change, as reflected in the geometric field pattern, the land at Camlet Way and Crescent Way has important value as a place for wildlife and flood mitigation.
5.	The historic importance of the land at Camlet Way and Crescent Way also extends to the immediately adjacent conservation area in Hadley Wood and, in the neighbouring borough, the 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.
6.	The Hadley Wood Conservation Area was updated as recently as 2015 and notes that views out across the open countryside comprise one of the key characteristics of the Conservation Area. This would be undermined by any development of land at Camlet Way and Crescent Way, causing harm to the Conservation Area.
7.	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 land at Camlet Way and Crescent Way.

8.	Land at Camlet Way and Crescent Way holds significant social and historical value. This is recognised through conservation area status of adjacent land as well as designation as an Area of Special Character. The LB Enfield Characterisation Study also makes specific reference to the site and classifies them as part of the 'Farmland Ridge and Valleys' character area. Development at Camlet Way and Crescent Way would put these qualities at risk. In this context the case for allocation of the site for development has not been justified and it should be removed from the proposed Local Plan.
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Policy context

- 1.1 The site identified for Green Belt release in Hadley Wood is clearly identified on the draft Local Plan policies map as falling within an Area of Special Character. The Policies Map identifies such areas as being covered by Policy DE9 of the draft Local Plan. This policy however refers to '*Shopfronts and Advertisements*'. Other policies appear relevant. These include:
- 1.2 Policy DM DE11: *Landscape Design*, which recognises the importance of '*the quality, distinctiveness and the sensitivity of the Borough's areas of landscape character*' and to '*restore, conserve and enhance*' such areas. A set of principles are established for areas of restoration, conservation and enhancement. These are:
- a) *the landscape character and distinctiveness of the area, including its biodiversity and cultural value and tranquillity;*
 - b) *the distinctive setting and identity of settlements (beyond the urban area) and buildings and the wider landscape, including strategic and local views;*
 - c) *the visual quality of the rural-urban fringe, marking a clear distinction between the urban edge and wider countryside;*
 - d) *the pattern of woodland, forests, trees, field boundaries, vegetation and other distinctive landscape features;*
 - e) *the special qualities of the historic landscapes, rivers, waterways, wetlands, lakes and ponds, and their surroundings; and*
 - f) *the topography of the area, including sensitive skylines, ridgelines and geological features.*
- 1.3 This is linked to Strategic Policy SP BG1: *Blue and Green Infrastructure Network*, which seeks to protect and enhance the quality of the infrastructure network across the borough. Equally, Policy DM RE1: *Character of the Green Belt and Open Countryside* is relevant. This sets out development criteria in respect of the impact of development on the landscape, Green Belt and open countryside, retaining features of landscape value and conserving the character of the landscape.

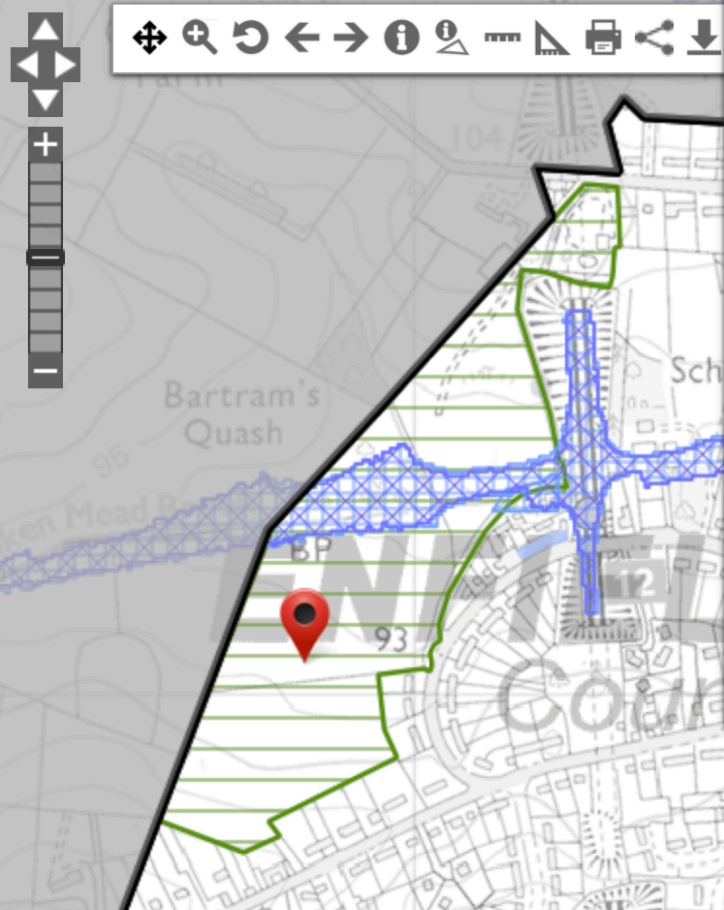
- 1.4 National Policy, as set out in the National Planning Policy Framework (NPPF), emphasises the importance of the landscape.
- 1.5 In respect of achieving well-designed places, para 130 (c) of the NPPF states that *'planning policies and decisions should ensure that developments.... are sympathetic to local character and history, including the surrounding built environment and landscape setting...'*. Chapter 15 of the NPPF specifically addresses the natural environment. Para 174 (a) clearly states that *'planning policies and decisions should contribute to and enhance the natural and local environment by... protecting and enhancing valued landscapes...'*.
- 1.6 These points are reflected in policies and supporting text in the London Plan. Para 8.11, which supports Policy G1: *Green Infrastructure*, requires boroughs to prepare green infrastructure plans that support landscape and heritage conservation. Policy HC1: *Heritage Conservation and Growth*, recognises the value of landscape to quality of life and sense of place. It notes that, in consultation with organisations, including local communities, evidence that helps understand the value of the historic environment, and that this can be used to conserve and enhance such environments, access to and interpretation of assets, landscapes and archaeology.
- 1.7 It is against this backdrop that the proposal to allocate land at Camlet Way and Crescent Way, Hadley Wood, is considered.

Area of Special Character

- 1.8 Land now subject to proposals for allocation was designated as an Area of Special Landscape Character as recently as 2013 through production of the Enfield Core Strategy. The findings and recommendations of the 'Enfield Area of Special Character Boundary Review' prepared in support of the Core Strategy remain relevant, with no change having taken place in the intervening period that would justify any 'de-designation'.
- 1.9 The 2013 Boundary Review recommended that the Areas of Special Character in Enfield be extended to include Hornbeam Hills South, reflecting its role and contribution to the wider landscape character area for Southern Hertfordshire¹. This acknowledges that much of the area is outside Hertfordshire and covers land south east of Potters Bar and north of Hadley Wood.
- 1.10 The recommendation is reflected in Core Strategy Policy DMD 84, to read alongside Core Policies 30, 31 and 33. The area of designation is clearly identified on the Interactive Policy Map that forms part of the Core Strategy (see Figure 1), as well as on the draft Local Plan Policies Map (See Figure 2)

¹ <https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/landscape/landscape-character-assessments/area026.pdf>

You are here: [Home](#) » [Planning and Building Control](#) » [Maps](#)



The following policy information is relevant for your query. Select link from the list below:

Core Policies for Environmental Protection and Green Infrastructure

Core policy 33	Green Belt and Countryside
Green Belt	
DMD 82	Protecting the Green Belt
DMD 83	Development Adjacent to the Green Belt
DMD 84	Areas of Special Character
DMD 85	Land for Food and Other Agricultural Uses
DMD 86	Agricultural Workers' Dwellings
DMD 87	Equine-related development
DMD 88	Farm Diversification

Please note that only results for visible policy layers will be returned. For a comprehensive list ensure all the policy layers are visible (i.e. 'All Layers On').

Figure 1: Enfield Core Strategy Interactive Policies Map, showing land at Camlet Way and Crescent Way designated as an Area of Special Character.

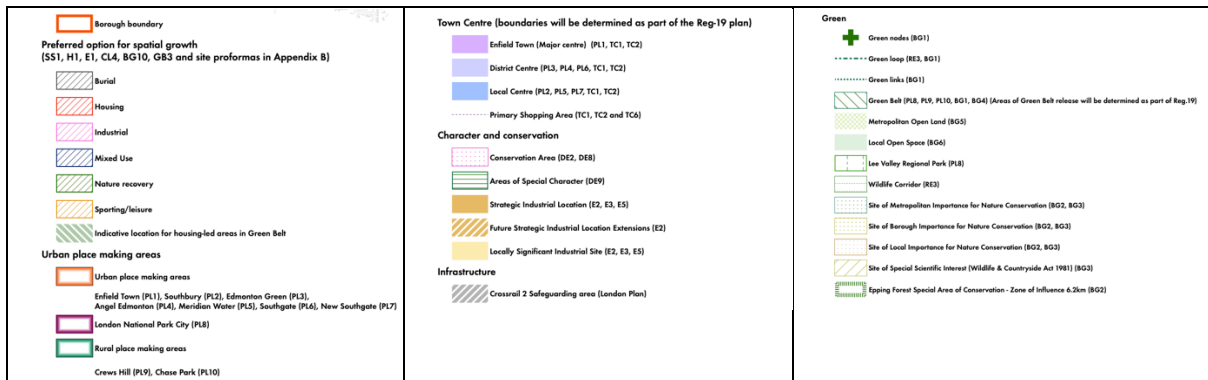
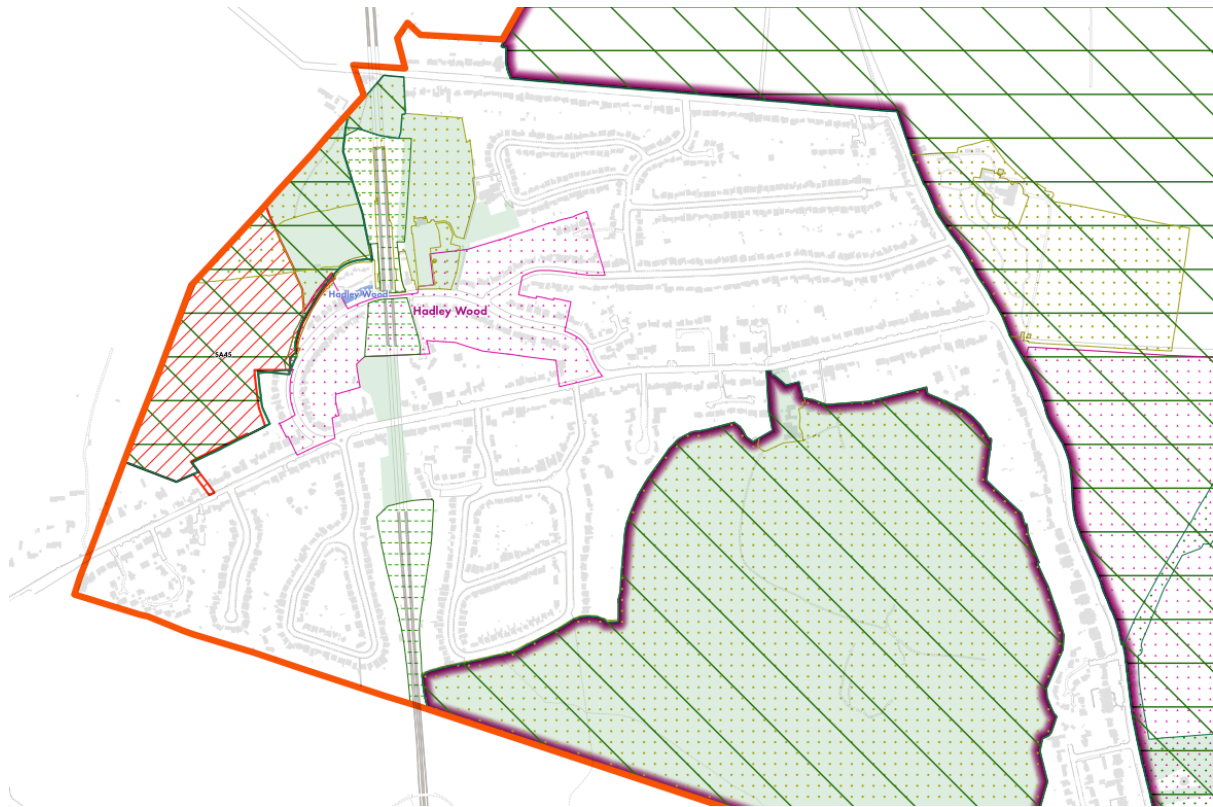


Figure 2: Extract from Regulation 18 Local Plan policies map (and key), indicating land at Camlet Way and Crescent Way being designated as an Area of Special Character

1.11 The assessment of the Southern Hertfordshire Landscape Character area and the Hornbeam Hills area makes note of the historical and cultural influences important to the wider Hornbeam Hills landscape. It mentions the historical importance of the geometric field patterns, which were created following the parliamentary enclosure of the former Chase in the late 18th century, as well as acknowledging the rarity and distinctiveness of the landscape in this part of the country, which is still intact and which the assessment notes *“is partly what gives the area such a distinctive character”*, and which *“is an unusual landscape type for the county”*. Furthermore, the assessment notes that *“the area is widely visible from the perimeter fringes and within the area from local roads. This is a large-scale coherent landscape with an open feel”*. It recommends that the landscape character area is ‘improved and conserved’.

County map showing location of
LANDSCAPE CHARACTER AREA



Figure 3: Figure 4: Hornbeam Hills (Enfield Chase) landscape character area (source: Hertfordshire Landscape Character Assessment)

- 1.12 Policy DMD 84 notes that new development within 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 key features and characteristics of the Hornbeam Hills South area are its strong undulating arable hills with geometric patterned large fields. Any development on the site would undoubtedly see the loss of the iconic geometric fields, as well as more generally impacting upon the large-scale coherent landscape which boasts an open feel.
- 1.13 This is reinforced by the Enfield Characterisation Study, which analyses the borough's overall pattern and evolution, drawing out key characteristics. The study makes specific reference to the iconic geometric fields that make up the proposed allocation site. It suggests that preserving these fields is important as they serve as good examples of 18th/19th century enclosed landscapes.
- 1.14 The study also repeatedly highlights the high landscape quality and historic value of the borough's Green Belt, and the importance of preserving a clear interface with adjoining urban neighbourhoods. The report specifically mentions 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. This statement directly applies to the proposed development site, and if any development were to go ahead, it would completely undermine the importance and validity of the point.

- 1.15 Furthermore, the Enfield Area of Special Character Boundary Review also notes how the character area is part of a significant Green Belt which performs an important role in retaining the separate identities of Potters Bar and Hadley Wood. This is discussed further in the Green Belt section of these representations. The value and importance of this is further highlighted in the Hadley Wood Wood Heritage and Character Assessment, prepared by Aecom in 2018 in support of the emerging Hadley Wood Neighbourhood Plan. In particular, the Aecom report highlights the value of Hadley Wood's surrounding semi-natural and agricultural character which acts as a buffer, separating it from other urban areas. If any development were to occur on the site it would undermine the importance placed on this separation and could serve to encourage further development that similarly closed the gap between Hadley Wood and other urban areas.
- 1.16 The Aecom report goes on to highlight the aesthetic value of the views from Hadley Wood, particularly those with a verdant backdrop that are visible across the area. It specifically refers to those views visible from the higher ground along Camlet Way and the roads descending into the valleys of Monken Mead. The report advises that this aspect of Hadley Wood should be sustained, reinforced or enhanced. Development on the site proposed for allocation in the draft Local Plan would not meet these objectives.
- 1.17 The location of the proposed allocation means that any development would neither sustain, reinforce or enhance these characteristics. Moreover, the draft Hadley Wood Neighbourhood reinforces the point that the surrounding farmland and mature woodland are treasured by the local community and deserve continued protection. The draft Neighbourhood Plan notes that the proposed allocation area is an important space and suggests that it be designated as a Local Green Space, meeting the criteria established in the NPPF for such designation. The draft Neighbourhood Plan notes that the site provides an invaluable area for recreation and wildlife, as well as acting as flood protection against the Monken Mead Brook. By allowing development to occur on this crucial piece of open space, Hadley Wood would be losing a major part of its local character. Given references in the London Plan (at Policy HC1) to boroughs working with local communities to better understand quality of place, identity and conserving and enhancing heritage and landscape assets, it is important that the Local Plan reflect the views and evidence prepared to inform the emerging Neighbourhood Plan.

Heritage

- 1.18 The value of the site proposed for allocation extends to matters of heritage. The site immediately adjoins the Hadley Wood Conservation Area (see Figure 5), which was reviewed as recently as 2015. Although the designation of the adjacent Conservation Area is not an absolute constraint to development, it is important to understand the impact of any development in the setting of the Conservation Area. It is also important to note that part of the Conservation Area includes an area of Green Belt along Bartrams Lane (see Figure 4).

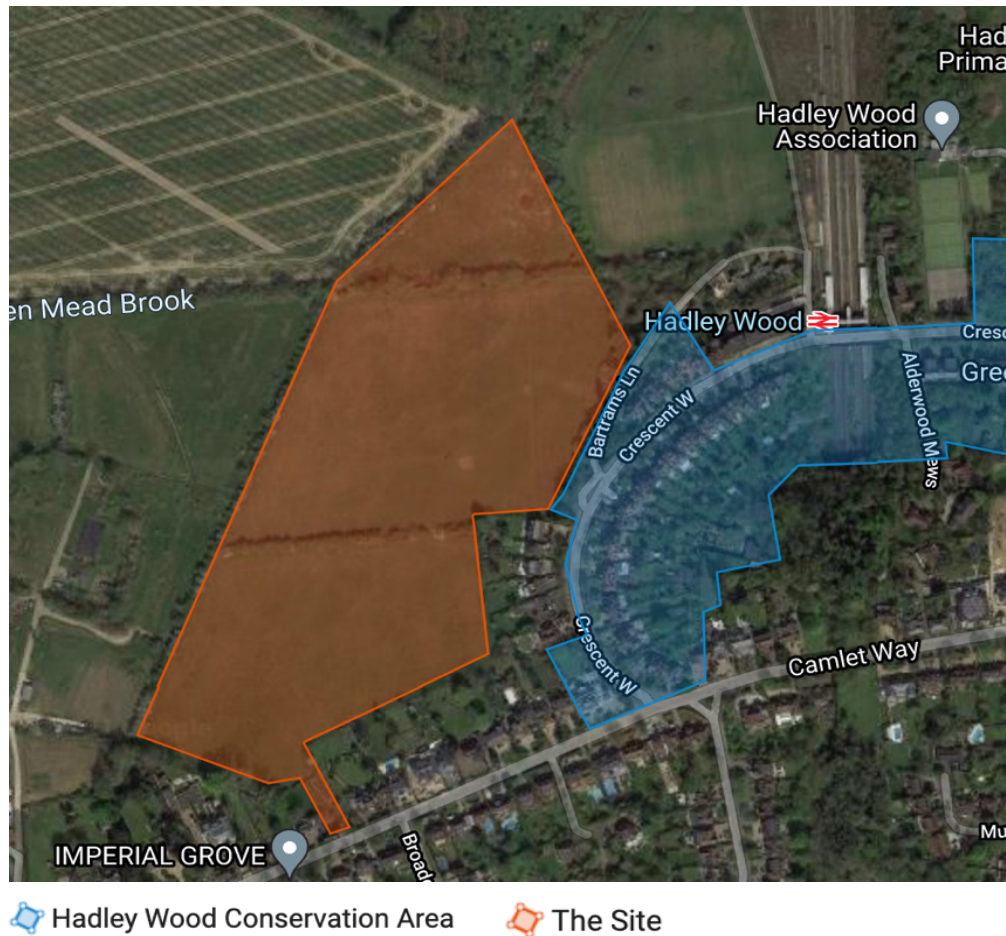


Figure 5: Map showing proximity of the proposed allocation site to the Hadley Wood Conservation Area. The next map (Figure 4), which presents more detail on the Conservation Area, shows that land along Bartrams Lane is within the Green Belt.

- 1.19 The proposed site for allocation is critical to the setting of the Hadley Wood Conservation Area. One of the key characteristics of the Conservation Area is the attractive breaks which 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 (see Figure 6). These characteristics would significantly be impacted upon should land at Camlet Way and Crescent Way be released for development, causing harm to the Conservation Area. It is also worth noting that there a number of Grade II listed buildings immediately south of the proposed site allocation along Camlet Way, the setting of which would be impacted upon by any developemnt.



Figure 6: Plan of the Hadley Wood Conservation Area, indicating key views, or which only two are identified: one of which is across the proposed allocation site

- 1.20 Matters of heritage extend beyond the borough boundary too, with the proposed allocation site immediately adjoining the Monken Hadley Conservation Area (see Figure 7) in the neighbouring borough of Barnet. This is a long standing conservation area, having been designated in 1971. In 1471 the Battle of Barnet (the penultimate battle in the War of the Roses) took place in this area.
- 1.21 The Monken Hadley Conservation Area Character Appraisal Statement notes that, in that part of the conservation area close to Hadley Wood, *“this is undeveloped... allows sweeping views... and gives the overall feeling of a rural setting”*. It notes that the field boundaries bordering the site are long established, as evidenced by hedgerows and hedgerow oaks. It goes on to state that it is likely that the field patterns reflect early enclosures which makes them of considerable historical significance.
- 1.22 Given the proximity of the proposed allocation site to the conservation area, any development that occurs on the proposed site would detrimentally impact upon the character of the Monken Hadley Conservation Area.



Figure 7: Map showing the proximity of the proposed allocation site to the Monken Hadley Conservation Area in the neighbouring borough of Barnet

- 1.23 The proposed allocation site is one that holds a significant amount of historical and social value. Development on the site threatens to take away an important part of the fabric of Hadley Wood. In the absence of associated heritage impact assessments for either the Hadley Wood Conservation Area or the Monken Hadley Conservation Area, it is not possible to deduce whether the development of the proposed site would adversely impact local heritage. As such, it is considered that the development of this site could cause undue harm to local heritage and therefore the inclusion of this allocation within the Regulation 18 Local Plan conflicts with paragraph 197c) of the NPPF, as it is not possible to establish whether the development would make a positive contribution to local character.
- 1.24 It is also considered that the development of the proposed site allocation would conflict with paragraph 201 of the NPPF, as there is no evidence to demonstrate that the harm caused to the surrounding conservation areas is necessary to achieve substantial public benefits.

