

# Appendix 5

# Sustainability Audit of SA45: Land Between Camlet Way and Crescent Way

Draft Enfield Local Plan 2019-2039

**Hadley Wood Neighbourhood Planning Forum  
&  
Hadley Wood Association**

September 2021

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# 1. INTRODUCTION

1.1 The 'Enfield Local Plan Main issues and preferred approaches' consultation document includes 3 policies that are predicated on sustainability grounds. These are

(a) draft residential allocation SA45: Land Between Camlet Way and Crescent Way.

(b) Policy DM DE6 Tall Buildings

(c) Policy DM H4 Small Sites and Housing Development

1.2 This Sustainability Audit provides a review of current social infrastructure, community facilities and services in Hadley Wood. In particular, it highlights those facilities in close proximity to the site, to ascertain whether new residential development would be supported in a sustainable manner to justify these policies.

1.3 The purpose of this Sustainability Audit is to consider the level of local services and facilities provided in the locality concerning education, healthcare, open space, shopping, sports and leisure and community facilities and to consider how the social and community infrastructure needs of the arising population can be met.

## **Site Context and Allocation**

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1.4 Draft residential allocation SA45 comprises 11.05 hectares of agricultural land to the north of Camlet Way and west of Crescent Way, Hadley Wood. It is located within the Cockfosters Ward of the London Borough of Enfield ('LB Enfield') and is indicatively allocated for an estimated 160 homes. The site is located within the Green Belt and whilst the site allocation text states it is within Flood Zone 1, according to the Environment Agency Flood Map for Planning, the northern field is located within Flood Zone 3. It is adjacent to the Hadley Wood Conservation Area, Monken Hadley Conservation Area and within the setting of various heritage assets.

Figure 1: Site Location



## Methodology

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

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

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

### **Assumptions and Limitations**

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

- MHCLG's Indices of Multiple Deprivation (2019),
- LB Enfield (and LB Barnet<sup>2</sup>) data, policy documents and strategy documents;
- Department of Education, Get Information about Schools Website for education facilities;
- NHS Choices for healthcare facilities;
- Sport England's Active Places Power database for sports facilities; and
- GLA's Population Yield Calculator.

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

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<sup>2</sup> The allocated site is located on the border of the LB of Barnet and therefore some services and amenities will be located in the adjoining Borough.

## 2. PLANNING POLICY CONTEXT

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

### National Planning Policy

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#### National Planning Policy Framework (2021)

2.2 The Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework (NPPF) in July 2021. Achieving sustainable development is identified as the purpose of the planning system. This latest revision of the NPPF highlights that the UK has agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These goals include good health and wellbeing, quality education and sustainable cities and communities.

2.3 Section 8 of the NPPF highlights how planning policies and decisions should aim to achieve healthy, inclusive and safe communities through promoting social interaction, providing safe and accessible neighbourhoods and enabling and supporting healthy lifestyles.

2.4 Paragraphs relevant to this Sustainability Audit are:

- **Paragraph 8** - considers the important economic, social and environmental role that planning plays to secure sustainable development.
- **Paragraph 9** - plans and decisions need to take local circumstances into account so that they respond to different opportunities for achieving sustainable development in different areas.
- **Paragraph 11** – plans and decisions should promote apply a presumption in favour of sustainable development. For plan-making this means that all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- **Paragraph 92** - planning policies and decisions should promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong

neighbourhood centres, street layouts that allow for multiple connections within and between neighbourhoods, and active street frontage;

- **Paragraph 93** - planning policies and decisions should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services;
- **Paragraph 95** – highlights it is important to provide sufficient choice of school places to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meet this requirement; and
- **Paragraph 99** – highlights existing open space provision should not be built on unless the proposed assessment would provide a replacement that is equivalent or better in terms of quantity and quality.
- **Paragraph 119**- planning policies and decisions should promote effective use of land in meeting the need for homes and other uses while safeguarding and improving the environment and ensuring safe and healthy living conditions.

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

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

Definitions relevant to this sustainability audit are:

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

#### **Regional Planning Policy**

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

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



- **Policy GG1 Building Strong an Inclusive Communities** outlines that developments must provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities.
- **Policy GG2 Making the best use of Land** echoes the previous policy by stating that sites should be priorities that are well-connected by existing public transport, jobs, services, infrastructure and amenities.
- **Policy D2 Infrastructure requirements for sustainable densities** states that where there is the insufficient capacity of existing infrastructure to support proposed densities, Boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time.
- **Policy S1 Developing London's social infrastructure** states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.
- **Policy T1 Strategic approach to transport** draws upon the mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. Therefore, new developments should make the most effective use of land, reflecting the connectivity and accessibility by existing and future public transport routes.
- **Policy T2 Healthy Streets** follows on from the previous policy by stating that development proposals should demonstrate how they will deliver improvements that support the ten healthy street indicators that reduce the dominance of vehicles on London's streets.

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

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

## Local Planning Policy

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### Enfield Local Plan - Main issues and preferred approaches (2021)

2.9 This “Issues and Options” version of the Local Plan 2039 was published for consultation in June 2021 and provides the Council’s preferred spatial option for where and when this growth and enhancement can be delivered.

2.10 Policies relevant to this Sustainability Audit are:

- **Policy SS1 Spatial Strategy** – States that the overarching spatial strategy for the Borough is to provide sustainable growth with supporting infrastructure. Therefore, development should be high quality, well designed with a focus on urban areas.
- **Policy SS2 Making Good Places** – Echoes the previous policy by outlining that all developments should positively contribute towards sustainable development that enhances the Borough’s character. All developments should be inclusive, accessible and make a positive contribution to the lives of Enfield’s communities.
- **Policy SE1 Responding to the Climate Emergency-** Outlined in this policy is the Council’s aim to use all the planning tools available to meet the 2040 net-zero carbon borough commitments as set out in the Climate Action Plan.
- **Policy SC1 Improving health and wellbeing of Enfield’s diverse communities-** Proposal are expected to contribute to healthy and active lifestyles and include measures that will help to reduce health inequalities. Examples of how this can be achieved include access to sustainable modes of travel, access to green infrastructure and access to leisure and recreational facilities.
- **Policy SC2 Protecting and Enhancing Social and Community Infrastructure** - Seeks to secure the timely provision of new or enhanced community facilities in association with development to meet the changing demands and identified needs of the Borough’s population, preferably towards the defined town centres.
- **Policy DE1 Delivering Well-designed, high quality and the resilient environment-** Stated in this policy is the need for all developments to be high quality and design-led. This includes development being accessible, inclusive, and well connected with other

places. Developments should be people should be priorities over private vehicles and integrated with sustainable modes of transport.

- **Policy BG4 Green Belt and Open Land-** In conjunction with the NPPF, Enfield Green Belt and Metropolitan Open Land will continue to be protected from inappropriate development and, where possible, enhanced. Developments that are adjacent to the Green Belt should not have a significant detrimental impact on the openness of the green belt and respect the character of the surroundings.
- **Policy BG6 Protecting Open Space-** Following Policy PBG4, the Local Plan states that development involving the loss of designated open space will be resisted unless new outdoor spaces can be provided or provided essential ancillary facilities.
- **Policy T2 Making Active Travel the Natural Choice-** Development will be expected to support the health street approach. Included within this are measures that encourage a shift to active transport modes and an increase in cycling and walking particularly for journeys under 2km. Overall, the removal of road traffic and prioritising active travel measures over car journeys should be encouraged.

#### **Enfield Characterisation Study**

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

#### **Creating a lifetime of opportunities in Enfield - Enfield Corporate Plan 2018-2022**

- 2.12 Although not strictly a planning policy document, it is still considered relevant to reference the adopted Enfield Corporate Plan which seeks to deliver the following:
- Good homes in well-connected neighbourhoods by maximising development opportunities around well-connected transport locations... and ensuring that health needs are built into design; develop infrastructure that will help to deliver significant economic growth, new homes and health-promoting environments;
  - Sustain strong and healthy communities by continuing to deliver services and protecting the local urban and green environment; and
  - Build the local economy to create a thriving place by enabling access to high-quality schools and learning and creating more opportunities for training and employment.

### 3. SOCIAL INFRASTRUCTURE AUDIT

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

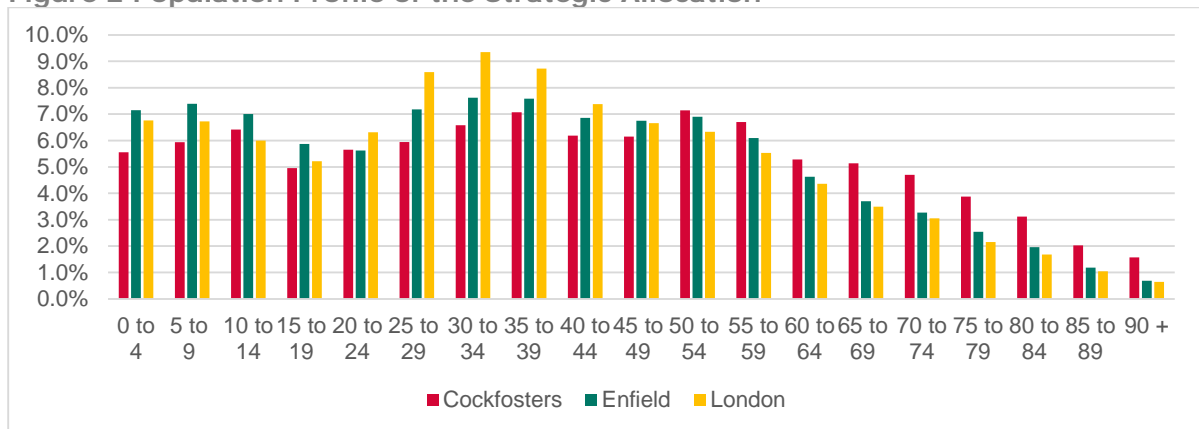
#### Demographic Profile

3.2 Based on ONS 2019 mid-year population estimates, the total population of the Cockfosters Ward where the proposed Strategic Allocation - SA45 is within had a population of 14,373. This is 4.3% of LB Enfield's total population.

#### Age Profile

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

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



Source: ONS 2019 mid-year population

#### Strategic Allocation Estimated Population Yield

3.4 The Enfield Draft Local Plan outlines in the proposed allocation SA45, that the Site could provide 160 new homes. Assuming the strategic allocation follows the Enfield Draft Local Plan

housing mix and tenure type, as outlined in **Policy SPH2 Affordable Housing** and **Policy DMH3 Housing Mix and Type**, it is possible to estimate the population the allocation could generate via the GLA Population Yield Calculator.

- 3.5 **Table 3.1** shows that the development would increase the population by approximately 460 people. Of which 61 children would be considered as early year children (0 to 4 years old<sup>3</sup>), 48 children would be of primary school age (5 to 11 years) and 37 children would be secondary school age (12 to 17 years old).

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

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

Source: GLA Population Yield Calculator

### Deprivation Profile

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- 3.6 The English Indices of Multiple Deprivation (IMD) 2019 provides a ranking of local authorities to compare levels of deprivation across the country. The IMD combines information from nine domains - income, employment, education, health, crime, barriers to housing and services, living environment, income deprivation affecting children and income deprivation affecting older people - to produce an overall relative measure of deprivation.
- 3.7 The Site is located within Enfield 011D LSOA (the boundary of this LSOA is shown in Figure 3 and Figure 4 below). This is ranked 27,233 out of 32,844 LSOAs in the country, placing it within the 9<sup>th</sup> decile of deprivation (where the 1<sup>st</sup> decile is the most deprived and the 10<sup>th</sup> decile is the least deprived). **Table 3.2** provides the breakdown of the rank (out of 32,844 LSOA) and the decile (out of 10) for each of the seven domains of deprivations.

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<sup>3</sup> The age ranges use for education facilities align with Enfield's evidence base. However, 4 year olds can also attend primary school but to avoid double counting they have been included as early years.

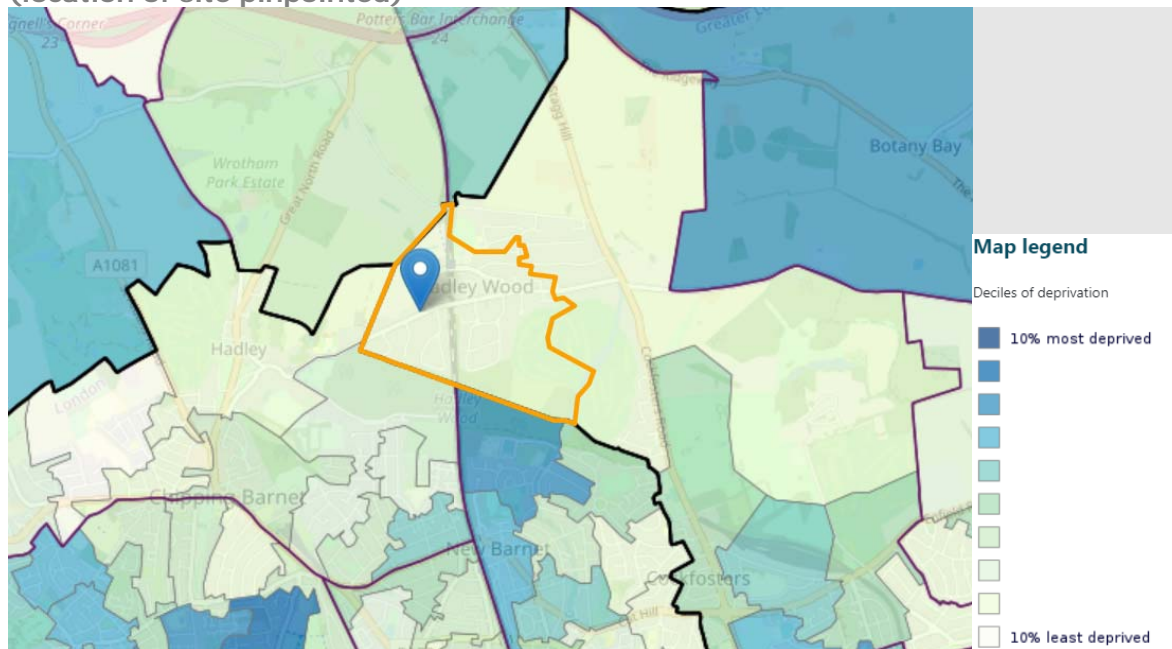
**Table 3.2 The Domains of Deprivation for the LSOA Enfield O11D**

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

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

3.8 **Figure 3** compares the Site’s LSOA Enfield O11D, to the surrounding LSOAs. This shows that the adjacent LSOAs to the allocated Site are ranked in the least deprived LSOAs deciles. The exception is LSOA Barnet 002A, located to the south of the proposed allocation, which is ranked in the 30% of most deprived neighbourhoods.

**Figure 3 Indices of Multiple Deprivation in LSOA Enfield O11D (orange boundary) - (location of site pinpointed)**

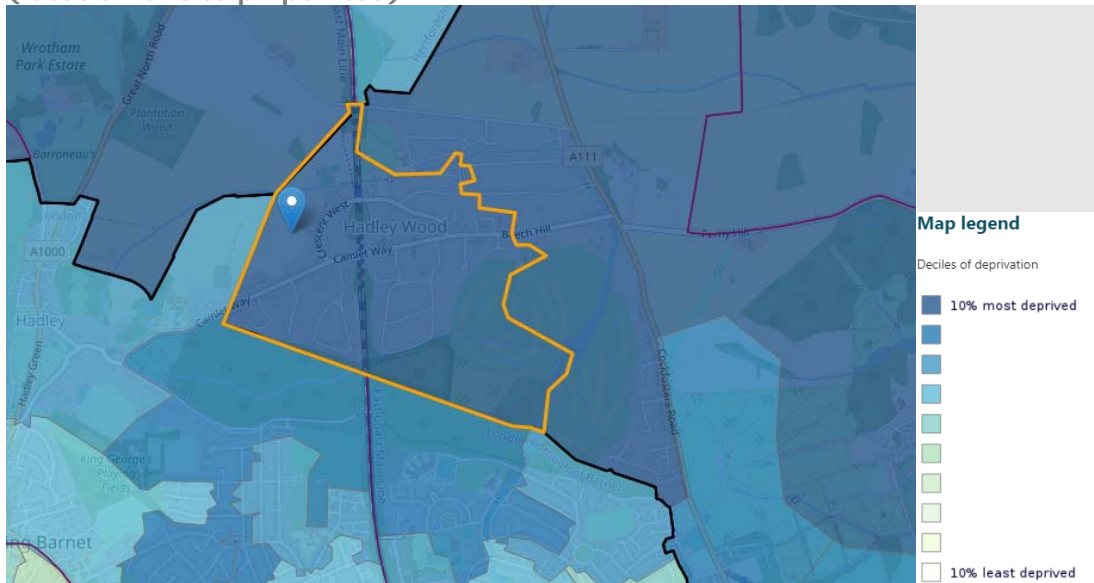


Source: English Indices of Multiple Deprivation 2019

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

- 3.10 This domain measures the physical and financial accessibility of housing and local services. Indicators fall into two sub-domains that relate to geographical barriers. The first is to the physical proximity of local services and the second is related to 'wider barriers' which includes issues relating to access to housing.

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



Source: English Indices of Multiple Deprivation 2019

### Education Profile

- 3.11 Across the Borough and throughout neighbouring London Borough's, school places are allocated based on a range of factors such as whether a child has siblings at a certain primary school and the distance the child would need to travel to primary school. Based on this, we have explored the primary school places that are available within 0.8km of the Site (equivalent to a 10-minute walk).
- 3.12 Enfield Council has responsibility for ensuring there are sufficient school places for every resident pupil that requires a school place as the Local Education Authority. However, the proposed strategic allocation site borders the London Borough of Barnet boundary (c. 250m distance). Therefore, the site is likely to be within the catchment areas of schools within both authorities.

### Early Years & Childcare

- 3.13 Early Years provision is provided in the borough through mostly privately run pre-schools and nursey groups, as well as a mix of nursey classes at local schools and children's centres. Most

children's centres are in the east and south of the borough whereas private nurseries are distributed evenly across the borough.

- 3.14 As outlined in the London Borough of Enfield, Childcare Sufficiency Assessment, 2018, the Cockfosters ward, where the proposed strategic allocation is located, is within the top three wards where a waiting list was most frequently reported for 2-year-olds for all-day childcare. Equally, the Enfield Draft Infrastructure Delivery Plan<sup>4</sup>, 2021, states that the Borough has below-average levels for achieving good cognitive development at age 5.
- 3.15 Within a walkable distance (800m) from the proposed strategic allocation, two nursery schools provide early years care for 2- and 4-year-olds. The Ofsted reports for each of the early years facilities shows that there is a capacity for 11 early years children at Hadley Wood Preschool whereas the Alphablocks Nursery is overcapacity. Although the most recently published data has been referenced, it is also worth noting that this data relates to 2017/2018 and therefore may not reflect the current position<sup>5</sup>.

**Table 3.3 Audit of early years provision**

| Name                                    | Walking Distance (km) | Ofsted Rating (Date) | Age Range | Capacity  | No. of pupils | Surplus or Deficit |
|---|-----------------------|----------------------|-----------|-----------|---------------|--------------------|
| Hadley Wood Preschool and Playgroup     | 0.6                   | Good (2017)          | 2-4       | 46        | 35            | +11 (76%)          |
| Alphablocks Nursery School and Pre-Prep | 0.8                   | Outstanding (2018)   | 2-4       | 32        | 33            | -1 (103%)          |
| <b>Total</b>                            |                       |                      |           | <b>78</b> | <b>68</b>     | <b>+10</b>         |

Source: Ofsted Reports (Ranging from 2017-18)

- 3.16 There are no walkable early year facilities for children aged under 2. The closest facility to the strategic allocation is Alban Pre School located in Monkey Hadley (c.2.5km). This is a privately owned early years facility.
- 3.17 The GLA population yield estimates that the proposed strategic allocation could increase the demand for early years spaces (0-4 years) by 61 spaces. This would increase the pressure on

<sup>4</sup> Enfield Draft Infrastructure Delivery Plan (2021)

<sup>5</sup> The Hadley Wood Preschool and Playgroup website indicates that there is "a few places available for the playschool and preschool for September 2021". The alpha-blocks provide no indication.



the walkable 2 to 4 early year's facilities by roughly 36 spaces. Based on the Ofsted figure, 26 early years residents would have to consider facilities outside of a walkable distance which would increase the reliance on car journeys to other early years facilities.

- 3.18 For the residents aged below 2 years of age (estimated to be 25 residents 0-2-year-olds), they would also have to travel to reach an early years facility appropriate for their age.

### Primary School Provision

- 3.19 The Draft Infrastructure Plan for the Borough states that Enfield currently has a surplus of primary school places (5- to 11-year-olds) across the borough as a whole, but a shortage is expected within the next ten years as a result of new housing developments and population growth. To accommodate the growth three new primary schools are to be delivered in the short term with eight primary schools increasing in form entry. However, these primary schools identified are not located in the vicinity of the proposed strategic allocation.
- 3.20 Two primary schools are within the 800m walking distance from the proposed strategic allocation Site. Using the Department of Education Database, Get Information about Schools, it shows that for the academic year 2019/2020 there were 360 primary school places offered between these schools. However, both schools are operating at 99% capacity levels with 1 space available at each primary school. Furthermore, the most proximate school – Monken Hadley CofE Primary School is not located within LB Enfield.

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

| Name   | Walking Distance (km) | Ofsted Rating (date) | Age    | Capacity   | No. of pupils | Surplus or Deficit |
|--|-----------------------|----------------------|--------|------------|---------------|--------------------|
| Monken Hadley CofE Primary School (LB of Barnet) | 0.8                   | Good (2017)          | 4 – 11 | 150        | 149           | +1 (99%)           |
| Hadley Wood Primary School                       | 0.7                   | Outstanding (2011)   | 4 – 11 | 210        | 209           | +1 (99%)           |
| <b>Total</b>                                     |                       |                      |        | <b>360</b> | <b>358</b>    | <b>+2</b>          |

*Source: Department of Education Data, 2019-2020*

- 3.21 The Audit Commission recommendation is that to avoid the risk of having insufficient capacity because of unexpected fluctuations in pupil numbers and to allow for flexibility and reasonable parent choice, schools should plan for a surplus of 7-10% of places. It is apparent that the schools in the local area operate with no headroom and provide no scope for flexibility at present.

3.22 A more recent review of the Enfield Admission to Reception, Autumn Term 2021 Report<sup>6</sup>, shows that Hadley Wood Primary School had a total of 168 applications for the start of the 2021 academic year which led to 33 children being refused a place. We also understand from the school that in addition to the usual annual in-take, there is currently an additional waiting list to gain entry into the school of 50 pupils. This is outlined as follows:

- Reception – 15 pupils
- Year 1 - 12 pupils
- Year 2 – 3 pupils
- Year 3 – 7 pupils
- Years 4 – 3 pupils
- Years 5 - 9 pupils
- Year 6 - 1 pupil

3.23 As the majority of the deficit is in Reception and Year 1, the situation will likely worsen in the next few years. Moreover, it is anticipated using the GLA population yield calculator that there would be a further 48 primary school-aged children in the Area<sup>7</sup>.

3.24 With no plans or land availability to expand the school, children from any new development in the area would be required to travel further to primary schools outside a walkable distance causing an increase in car use at peak times as there is a very poor bus connection in the local area. This is not considered to represent sustainable development and does not align with planning policy objectives.

3.25 This is confirmed through the Transport for London (TFL) WebCAT time mapping planning tool that estimates from the proposed strategic allocation travelling to a primary school via public

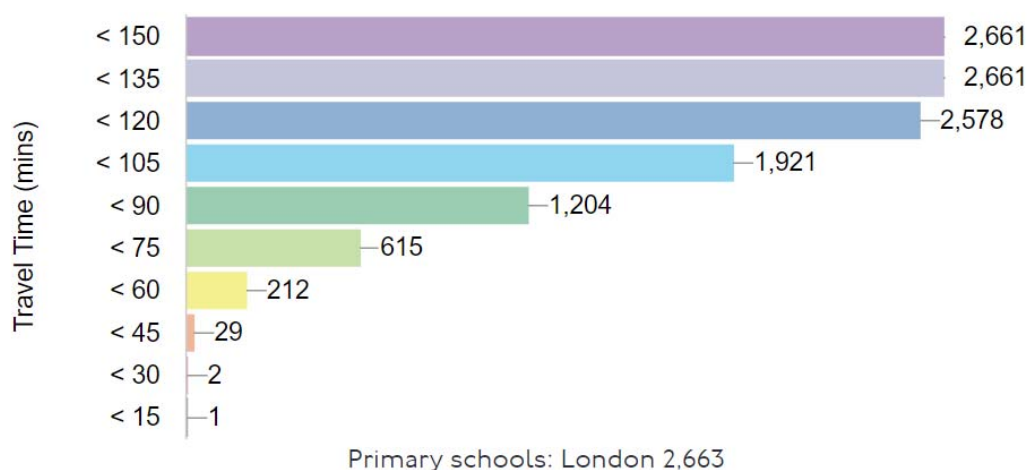
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<sup>6</sup> Admission to Reception, Autumn Term (2021) information about Waiting Lists, Appeals and Breakdown of Allocations for Community Schools, Academies and Free Schools In Enfield.

<sup>7</sup> The number of primary school pupils could include 4-year-olds which are accepted in reception as well as early years facilities. To avoid double counting they have been left out of primary school age range but it is expected that they will add further to capacity pressures.

transport<sup>8</sup> would take less than 30 minutes to reach 3 primary schools but up to 45 minutes to reach 29 primary schools. This is a significant deterrent for parents/guardians accompanying their children to school and will likely, therefore, travel by car.

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



Source: TFL, 2021

### Secondary School Provision

3.26 The 2021 Draft Infrastructure Plan for the Borough outlines that there is currently a small surplus of places to accommodate 11- to 18-year-olds in the short to medium term in the Borough overall. However, as the growth of the primary school population continues in the long term there will be inevitable pressure on the existing secondary school provision and this will be exacerbated over time. This is most notably in the west of the Borough (which is where Cockfosters ward is located). The Borough is therefore planning to open more entry forms at secondary schools, however, these are not within reach of the Site.

3.27 There are currently no secondary schools within a walkable (800m) distance from the proposed Strategic Allocation.

3.28 The closest Secondary School is the Jewish Community Secondary School (JCoSS) which is located a 3km walk to the south. This school is located within the London Borough of Barnet and therefore is unlikely to prioritise admissions from pupils living in LB Enfield. For the previous academic year, the school had an additional capacity for 27 secondary school-aged

<sup>8</sup> TFL define all mode of public transport as the use of bus, bike or walking.

children. This constitutes a 98% surplus which provides very limited flexibility and choice for school places and is significantly below the 7-10% buffer recommended.

3.29 The nearest non-religious, co-educational, established comprehensive school<sup>9</sup> is East Barnet School located approximately 4.4km south in the London Borough of Barnet. According to Ofsted, the school is significantly overcapacity<sup>10</sup>. The nearest non-religious, co-educational, established comprehensive school within LB Enfield is Southgate School located approximately 4.5km to the southeast, and is operating at over 98% capacity<sup>11</sup>.

**Table 3.5 Audit of Secondary School Provision**

| Name   | Walking Distance (km) | Ofsted Rating | Age Range | Capacity | No. of pupils | Surplus or Deficit |
|--|-----------------------|---------------|-----------|----------|---------------|--------------------|
| Jewish Community Secondary School (LB of Barnet) | 3                     | Good          | 11-18     | 1,360    | 1,333         | +27 (98%)          |
| East Barnet School                               | 4.4                   | Good          | 11-18     | 1,350    | 1,421         | -71 (105%)         |
| Southgate School                                 | 4.3                   | Good          | 11-18     | 1,531    | 1,503         | +28 (98%)          |
| <b>Total</b>                                     |                       |               |           |          |               | <b>-16</b>         |

Source: Department of Education Data, 2019-2020

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

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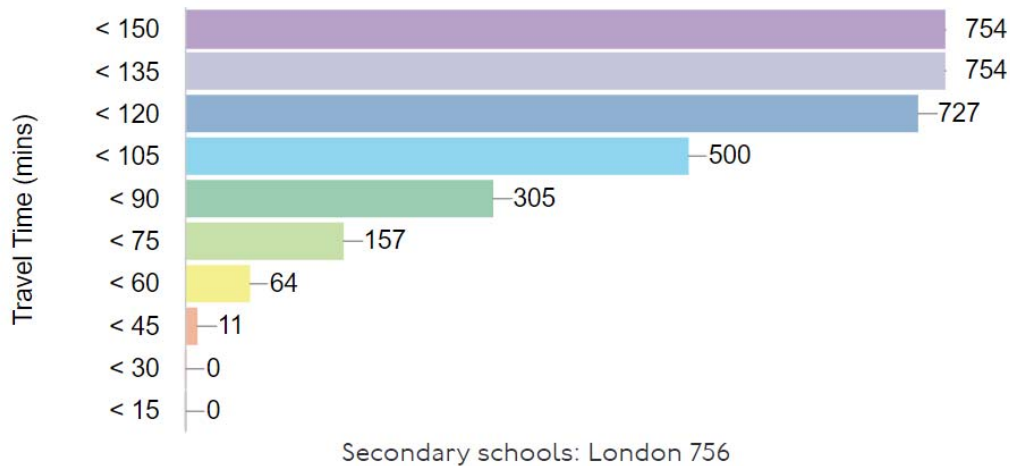
<sup>9</sup> Located c. 3km from the Site is the Queen Elizabeth School for Girls, equally there is the Ark Pioneer School located 3.5km which is a new school and currently only provides secondary school spaces for Years 7 and 8. The East Barnet School is the closest non-religious, co-educational secondary school for school years 7 to 13.

<sup>10</sup> <https://reports.ofsted.gov.uk/provider/23/136658>

<sup>11</sup> <https://reports.ofsted.gov.uk/provider/23/142727>

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

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



Source: TFL, 2021

3.32 Overall, this analysis indicates that there would not be sufficient secondary level education provision to accommodate needs. This does not constitute sustainable development.

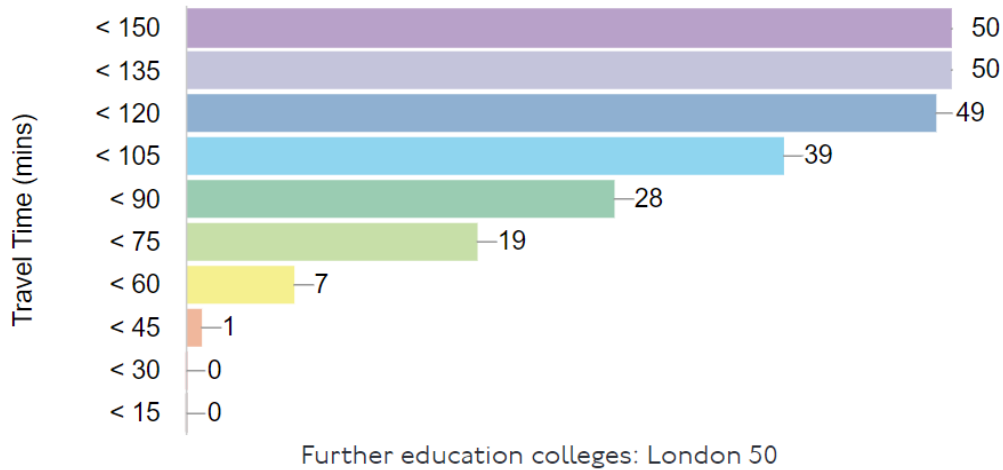
**Further Education Provision**

3.33 There are 17 sixth forms across the borough. As outlined in the Borough’s Draft Infrastructure Plan, across London there is a rise in demand for further education as pupils move on from secondary school. Going forward, the borough will expand its further education through sixth form colleges, academies, and secondary schools to meet the forecast demand over the plan period. That said, new education facilities can have a long lead-in period to secure funding, planning and implementation before they are fully operational.

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

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

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



Source: TFL, 2021

## Healthcare

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

### GP Surgery Provision

3.37 Data provided by Public Health England show that across the Borough, there is an average of 1 GP serving 1,979 patients. This is above the recommended benchmark of 1,800 patients per full-time equivalent GP<sup>12</sup> which indicates there is insufficient capacity.

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

3.39 The Village Surgery in New Barnet (3km distance away) is the closest GP practice within the patient boundary for Hadley Wood<sup>13</sup>. The surgery has 3 GP serving 5,304 patients, therefore

<sup>12</sup> Based on the Royal College of General Practitioners Patient to GP Benchmark

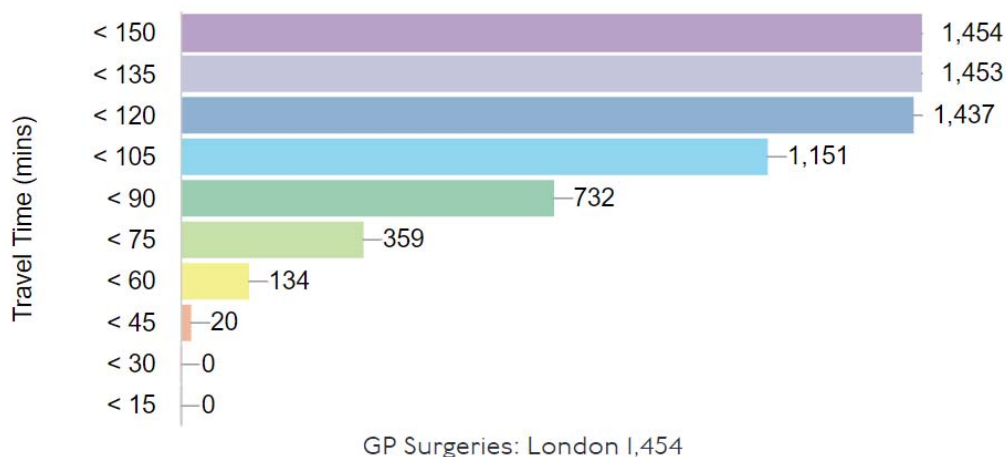
<sup>13</sup> The Addington Medical Centre (2km away) and The Old Court House Surgery (2km distance) are closer in distance but outside of the patient boundary catchment area for Hadley Wood.

one GP serves 1,768 patients. The surgery is running at 99% capacity when applying the benchmark ratio of 1 GP to 1,800 patients.

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

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

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



Source: TFL, 2021

### Hospital Provision

3.42 The proposed Strategic Allocation Site is 3km from Barnet Hospital. The Hospital offers acute medical services including paediatrics, dermatology, and orthopaedics. The last Care Quality Commission Report conducted in December 2019, stated that the Hospital requires improvement particularly in the areas of safety and responsiveness.

3.43 To use public transport, TFL anticipates it would take over 1 hour to reach the nearest hospital using public transport.

### Dental Surgery

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

- 3.45 The three closest dental practices are all in the London Borough of Barnet and include Grove Dental Practice, approximately (1.9km distance), Barnet Dental Practice (2.8km distance) and High Barnet Dental Care (2.4km distance). Two out of the three practices are open to new patients with High Barnet Dental Care limiting new patients due to the COVID-19 backlog.

### **Community Facilities**

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

#### **Places of Worship**

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

#### **Community Halls**

- 3.48 Hadley Wood Association provide a village hall that can be rented out as a function venue. The association also act as a hub for the local community events such as fireworks day celebrations and maintenance of the centres that provide the tennis club, pre-school, ballet school and bridge clubs. The hall is currently not being offered due to Covid19 restrictions and only provisional bookings are being accepted<sup>14</sup>.

#### **Libraries**

- 3.49 There are no libraries that are within a walkable distance from the strategic allocated site. The closest library is Chipping Barnet Library (in LB Barnet) which is c.2.4km from the Site. As well as offering the books to loan, the library also provides computer use. Taking into account that 2.4km is three times further than the 800m distance that is considered walkable, this is likely to impact the use by residents in this area particularly the elderly and those with young children.

#### **Emergency Services**

- 3.50 There is no police station in the area of the proposed Strategic Allocation. The police station that serves Hadley Wood is located in Edmonton which is 11.6km away from the Site. The Enfield Corporate Plan seeks to tackle all types of crime and anti-social behaviour in the

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<sup>14</sup> As stated on the Hadley Wood Association website.



Borough, it would be difficult to achieve this in this location with the lack of a proximate police station.

- 3.51 Barnet Fire Station is the nearest fire station located c.2.4km from the proposed Site. There is also an ambulance with a station located at this site.
- 3.52 The Draft Infrastructure Plan states that there will be a further 3 ambulance stations in Edmonton, Ponder End and Chase Farm Hospital as well as fire and rescue service provided at Enfield Town, Edmonton and Southgate. Two Police response units are also planned in Enfield Town and Edmonton. These are not located to the west of the borough and therefore will add little to the provision in the subject ward.

### **Green Infrastructure**

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

#### **Open Space**

- 3.54 Contained within the Enfield Blue and Green Infrastructure Audit 2020, the Borough has set accessibility standards for residents to access open space. Metropolitan Park's should be 3.2km away, district parks, 1.2km and a local park 800m away. Children's play space provision should be 400m away with allotment or community gardens being 800m away. This also aligns with the London Plan standards.
- 3.55 There are five areas of large open spaces within the accessibility standards of the strategic allocated site. There are children's playgrounds on the Hadley Wood Association's open space, next to the Primary School.

**Table 3.6 Audit of open space provision**

| Name                      | Walking Distance (km) | Type of open space <sup>15</sup> |
|---------------------------|-----------------------|----------------------------------|
| HMA Open Space            | 0.6                   | Local Site                       |
| Covert Way Nature Reserve | 0.8                   | Local Site                       |
| Monken Hadley Common      | 0.9                   | Metropolitan Park                |
| Hadley Green              | 1.3                   | Metropolitan Park                |
| King George's Field       | 1.3                   | District Park                    |

Source: Google Maps, 2021

### Sports Facilities

- 3.56 A review of the Active Power Places tool which supplies data from Sports England identifies a limited range of commercial sport and recreation facilities within an 800m walkable radius of the Site. Contained within this distance is Hadley Wood Tennis Club providing 7 tennis courts. On the edges of this radius, there are two privately owned golf courses.
- 3.57 Notably, the HWA have a sports pitch in their open space which is used on an informal basis, but mainly by Mount House private school. The closest swimming pool and leisure centre is 1.6km away in New Barnet Leisure Centre.

**Table 3.7 Audit of sports provision**

| Name                     | Walking Distance (km) | Facilities      |
|--------------------------|-----------------------|-----------------|
| Hadley Wood Tennis Club  | 0.5                   | 7 tennis courts |
| Hadley Wood Golf Club    | 1.2                   | Golf Course     |
| Old Fold Manor Golf Club | 1.4                   | Golf Course     |

Source: Active Power Places, 2021

- 3.58 The existing provision, therefore, caters for a very narrow range of sports as they are not multi-functional facilities, this does not act to encourage sports participation and healthy lifestyles which is becoming increasingly important in a post-COVID 19 environment.

### Retail Facilities

- 3.59 There is one small convenience store (Londis) in Hadley Wood approximately 0.3km from the proposed Strategic Allocation. The Londis sells a range of own-brand groceries as well as off licence. There is a cluster of small food stores within Chipping Barnet approximately 2.1km

<sup>15</sup> The Open Space have been categorised by the following sizes: Regional Sites (400+ ha), Metropolitan Site (60-400ha), District sites (20-60ha), Local sites (2-20ha) and small local sites (up to 2ha). This follows the blue and green infrastructure audit 2020.

walk from the Site. This includes supermarket brands such as Iceland, Tesco Express, Sainsbury's Local and a Waitrose.

- 3.60 Located adjacent to the Londis along the Crescent Local Parade is a beauty salon, interior design shop, a café, a restaurant, an estate agent and a private personal trainer facility.
- 3.61 The closest post office, bank and pub are also located in the Chipping Barnet High Street which is approximately 2.5km walk away.

### **Sustainable transport provision**

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- 3.62 The site has a Public Transport Accessibility Level (PTAL) rating of 1, indicating very poor access to public transport infrastructure<sup>16</sup>.
- 3.63 The Site is approximately 400m from Hadley Wood Train Station. Southern Rail, provide two trains every hour going to Moorgate and Welwyn Garden City. There is no service to Enfield Town or Cockfosters.
- 3.64 The nearest tube station is High Barnet Tube Station which is approximately a 3.2km walk away. This is on the northern line and provides direct access into central London. Cockfosters tube station is the nearest tube station in the borough and this is situated 3.5km away and provides service to Central London and Heathrow via the Piccadilly Line.
- 3.65 There are bus stops for the 399 bus located on Camlet and Crescent Way that go to the Spires Shopping Centre in Chipping Barnet. The bus route is relatively infrequent and goes to the eastern edge of Hadley Wood and then back towards Monken Hadley which is located to the west of the Site.
- 3.66 There is a single file footpath that connects the Hadley Wood to Monken Hadley. There are no designated cycle paths in Hadley Wood.
- 3.67 A Walkability Index study has been undertaken for Hadley Wood by Space Syntax. It finds that Hadley Wood has an average walkability score of 7.8, which is notably below the average

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<sup>16</sup> TfL - <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

for Enfield (24) and significantly below the average for London (60). The factors contributing to the low walkability score in Hadley Wood are identified as being:

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

3.68 The poor PTAL score shows that the allocated site is not suitable for Draft Policy DE6 Tall Buildings or Draft Policy H4 Small Site and Small Housing Development. This is because outlined within these policies is the need for good transport accessibility (a PTAL score of 3 to 6).

### **Summary**

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

| Service / Infrastructure | Sufficient provision | Explanation   |
|--------------------------|----------------------|---|
| Early Years Education    |                      | Within a walkable distance, there are two early year facilities providing places for 2- and 4-years old. There are no facilities within a walkable distance that provide care for children under 2. Across the two facilities, there is an estimated capacity for 10 more places. However, the proposed development is anticipated to add a further 61 early years children. This would increase the pressure on the walkable 2 to 4 early year's facilities by roughly 36 spaces. For the residents aged below 2 years of age (estimated to be 25 residents 0–2-year-olds), they would also have to travel to reach an early year's facility appropriate for their age.                  |
| Primary Education        |                      | There are two primary schools within a walkable distance (800m) from the proposed strategic allocation. The closest school is not located in LB Enfield. Current capacity levels show that both schools are operating at 99% capacity levels thereby providing extremely limited flexibility. More recent data indicates there are 50 pupils on the waiting list for Hadley Wood Primary School which does not have available land for expansion. The proposed strategic site is estimated to increase the primary school need in the area by a further 48 children, hence requiring travelling outside a walkable distance to attend primary school.                                     |
| Secondary Education      |                      | There are no secondary schools within a walkable radius. The closest non-religious, co-education established secondary school in the borough is the East Barnet School 4.4km from the site. The secondary school is operating at 105% capacity, with no surplus places. The addition of a further 37 secondary school-aged children would put the school at overcapacity. Any secondary school-aged children at the proposed strategic allocation would be required to travel even further to school, going against the grain of sustainable development and likely increasing car reliance. Equally, there is no planned provision of secondary schools within the vicinity of the Site. |
| Further Education        |                      | There are no walkable further education facilities. There is one college that provides post-16 education located 2.1km away. Whilst there is planned provision, there is likely to be a long lead-in period before the facility would be complete and operational.  |
| Healthcare facilities    |                      | There are no NHS GP practices or dental facilities within a walkable distance from the allocated Site.  |
| Community facilities     |                      | There is a variety of places of worship in Hadley Wood and there is a community hub provided through the Hadley Wood Association. However, there are no libraries or emergency services provided in the vicinity of the proposed strategic allocation.  |

|                       |  |  |
|-----------------------|--|--|
| Open space and sports |  | There are five areas of open space that are accessible from the allocated site. There is also a playground for young people. Aside from the golf clubs and a tennis club in the area, there is minimal sports provision, unless a car journey is taken to a sports facility. The extent of provision is unlikely to support active lifestyles and resident well-being. |
| Retail                |  | There is a small cluster of shops (local parade) around Crescent Parade, providing a small convenience store, beauty salon, a café, a restaurant and an estate agent. Overall, there is limited provision to support the current and future estimated 460 residents of Hadley Wood.  |
| Transport             |  | The PTAL rating of 1 indicates very poor transport provision. Within a walkable distance, there is Hadley Wood Train Station and a bus stop (providing one bus route). There is poor pedestrian and cycling infrastructure in Hadley Wood. This does not support active travel and does not represent sustainable patterns of development.                             |

## 4. INTEGRATED IMPACT ASSESSMENT

- 4.1 Enfield Council has published an Integrated Impact Assessment<sup>17</sup> (IIA) which incorporates a Sustainability Appraisal, Strategic Environmental Assessment, Health Impact Assessment, Equalities Impact Assessment, Community Safety Impact Assessment and Habitats Regulations Assessment of the draft Enfield Local Plan: Main Issues and Preferred Approaches.
- 4.2 It includes a framework of 18 objectives which the proposed Strategic Allocation Site – SA45 has been profiled against the 18 objectives with the assessment based on the 11.05 hectare Site providing 160 dwellings. Against each of the objectives, a colour coding effects symbol has been given as shown in **Figure 9**.

**Figure 9 Integrated Impact Assessment Key**

|       |  |
|-------|--|
| ++    | Significant positive effect                                |
| ++/-  | Mixed significant positive and minor negative effect       |
| +     | Minor positive effect                                      |
| 0     | Negligible effect  |
| -     | Minor negative effect                                      |
| --/+  | Mixed significant negative and minor positive effect       |
| --    | Significant negative effect                                |
| ++/-- | Mixed significant positive and significant negative effect |
| +/-   | Mixed minor positive and minor negative effect             |
| ?     | Uncertain effect   |
| N/A   | Not applicable   |

Source: *Enfield Integrated Impact Assessment, 2021*

- 4.3 Overall, the IIA lists one significant positive effect in the delivery of housing, two minor positive effects. Four objectives have been assigned as having a minor negative effect and a further four as having a significant negative effect. The remainder of the objectives has been given a negligible status except for sustainable transport that is anticipated to have a mixed significance of positive and negative effects.

<sup>17</sup> Enfield Council (2021) Enfield Local Plan Integrated Impact Assessment

## **Review of the SA45 against the Integrated Impact Assessment Objectives**

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

- 4.4 A negligible effect has been given in the IIA to the proposed allocation for the objective to ensure that Borough minimises the CO2 emissions per capita intending to become carbon neutral by 2040. Based on the baseline analysis, this would not be possible for the proposed strategic allocation to contribute to achieving this goal.
- 4.5 The baseline analysis showed that within a walkable distance (800m) from the allocated site there is a deficit of amenities and services. Coupled with this the area has poor public transport infrastructure shown through the PTAL rating of 1. Overall, this means that the allocated Site would lead to an increase in the number of trips taken by car by the new residential population. In doing so, contributing to climate change and the Borough's goal of becoming carbon neutral. Therefore, the outcome of the allocation would have a significant negative effect on achieving object 1 of the IIA.

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

- 4.6 A negligible effect has been assigned in the IIA to ensure that climate change adoption is considered. This objective has a particular emphasis on the likelihood of higher temperatures and worsening flood risk.
- 4.7 On the one hand, the outcome of this objective is related to the design of the proposed strategic allocation, however, on the other, the site is currently greenfield land and has been for centuries, with parts of the site are at risk of flooding, therefore the removal of open space will impact the flood risk in the area. Therefore, there will be a minor negative effect to the adaption to climate change.

### **IIA3: Housing**

- 4.8 The IIA awards housing as a significant improvement to the area. The delivery of 160 homes will have a positive impact on achieving Enfield's housing target for both market and affordable homes.

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

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



- 4.10 There are poor healthcare facilities in the Hadley Wood area with no NHS GP or dental practices. Therefore, to access healthcare, residents are required to travel to neighbouring suburbs.
- 4.11 In the area of the allocated site, there are poor sports facilities with Hadley Wood having a 7-court tennis club and golf courses. Recreational facilities such as gyms, swimming pools are located out of the Hadley Wood. There is a sports pitch which is informally used by Mount House private school. This does not support healthy lifestyles.
- 4.12 Our analysis provided in Section 3 demonstrates that on balance, there are relatively limited facilities within the vicinity of the site. On this basis, we are of the view that the negatives outweigh the positives.

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

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

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

- 4.17 The proposed strategic allocation has been assessed to have a negligible effect on social inclusion. This objective aims to reduce poverty and social exclusion along with developing social cohesion through good urban design, using the health streets indicators and community spaces as a catalyst for community cohesion.
- 4.18 Overall, the analysis would agree that a negligible effect on social inclusion would be anticipated. This is because while there is an established community group in the Hadley Wood Association that have a community facility that provides a pre-school, a ballet school

and bridge clubs to the local community the healthy streets aim of reducing traffic would not be achieved at the allocated Site.

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

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

4.20 A key contributing factor to this is that the police station that serves Hadley Wood is in Edmonton which is 11.6km away from the strategic allocation. The Enfield Corporate Plan seeks to tackle all types of crime and anti-social behaviour in the Borough, it would be difficult to achieve this in this location with the lack of a proximate police station.

#### **IIA8: Road Safety**

4.21 The baseline analysis showed that there is a pedestrian single-file walkway from Hadley Wood to neighbouring area Monken Hadley and that there are no cycle paths in the surrounding area. There is one bus route that runs through Hadley Wood and a train station that provides twice-hourly train service to Moorgate and Welwyn Garden City. The A111 Cockfosters Road which is already operating at over 100% capacity and increased traffic on this road from housing development being proposed in the Local Plan will lead to more accidents.

4.22 Therefore, when marked against the 10 indicators of the Health Street Approach, the allocated Site scores poorly on the two main indicators, pedestrians from all walks of life and people who choose to walk, cycle and use public transport.

4.23 Based on the above, the allocated Site will increase the number of cars on the road and therefore decrease road safety. For this reason, a minor negative effect should be expected. This is worse than the IIA which concluded a negligible effect at the allocated Site.

#### **IIA9: Economy**

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

#### **IIA10: Town and Local Centre**

4.25 Enfield's assessment of the proposed strategic allocation on the town and local centres anticipates a minor positive effect as an outcome of the allocated site. This is based on the enhancement of vitality and vibrancy of the town and local centre.

4.26 The baseline analysis showed that within Hadley Wood there is a very limited provision of commercial and community services. It can be anticipated that the positive effects of increased footfall from the subject site, would largely be felt outside of Hadley Wood, in Barnet where there is a wider retail offer.

#### **IIA11: Air Pollution**

4.27 As declared in the LB of Enfield Air Quality Action Plan<sup>18</sup> the entire Borough of Enfield is within an air quality management area. The IIA assigned a minor negative effect to the level of air pollution arising from the allocated Site.

4.28 From the baseline analysis, a contributing factor is an increase in the number of car journeys that would be required because of the poor transport links and limited services provision in Hadley Wood. In doing, there will be an increase in air pollution that will be caused by traffic. Equally, the pedestrian infrastructure in the area is limited which affects the health impacts of residents in the area.

#### **IIA12: Sustainable Transport**

4.29 Both a mixed significant positive and a mixed significant negative effect has been assigned in the IAA to the sustainable transport at the proposed strategic allocation. Contained within this objective is the desire for the Site to provide safe and easy access to public transport and services, promote the use of electric cars and sustainable modes of transport and promote compact, mixed-use development, which encourages walking and cycling for short journeys. Above all else, the objective seeks to support a modal shift away from the private car.

4.30 The PTAL rating of 1 (the lowest outcome) for the location of the proposed strategic allocation shows that there is very poor access to public transport infrastructure in the area. This is confirmed through the area having one bus route and a train station that provides a twice-hourly train service. Equally, there is no cycle infrastructure in place in the area and a single file footpath linking Hadley to the neighbouring areas.

4.31 The baseline analysis has shown that the area is dependent on the use of private cars through having a limited range of walkable social infrastructure in the area. Therefore, the allocated site is unable to support the objective of sustainable transport, increase the effect to be significantly negative.

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<sup>18</sup> LB of Enfield Air Quality Action Plan (2001)

#### **IIA13: Biodiversity**

- 4.32 The greenfield Site is anticipated in the IIA to have a significant negative effect on biodiversity. Notwithstanding the design of the scheme implementing biodiversity net gain enhancements, the allocated site is currently undeveloped and consequently will harm biodiversity. This goes against the objective aim of delivering biodiversity net gain at an ambitious scale and avoids/mitigate impacts to value habitats and ecological networks.

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

- 4.33 A questionable minor negative effect is predicted to the historical environment if the allocated site is developed. This has been assigned based on the objectives aim of supporting the integrity, character and heritage assets in the Borough that are both designated and non-designated. There will be an impact on the setting of the listed buildings backing onto the site and impacts on the setting of both Hadley Wood and Monken Hadley Conservation Areas.
- 4.34 With the removal of greenbelt land to make for the proposed strategic allocation, significant negative effects would occur to the historical environment due to proximity to heritage assets.

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

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

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

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

#### **IIA17: Flooding**

- 4.37 The effects of flooding in the IIA have been assigned a minor negative effect as a result of the allocated Site. The Enfield Policy's map has shown the northern boundary of the allocated site to be in Flood Zone 3. This means that there is a 1 in 100 or greater annual probability of river flooding.
- 4.38 The effects of flooding will also be enhanced by the site's removal from greenfield land which reduces the natural drainage permeability of land and increases the risk of surface water

flooding due to increased run-off. In light of this, a minor negative effect of flooding can be anticipated.

#### **IIA18: Water**

- 4.39 An uncertain significant negative effect has been estimated to occur if the allocated Site was to be developed in the IIA. In part, the minimising of water use is a consequence of the design of the site however, the deterioration of groundwater and surface water is anticipated as the site is removed from greenfield open space.

### **Review of Integrated Impact Assessment**

- 4.40 **Table 4.1** provides a review of Enfield's IIA against the analysis of the sustainability audit. A RAG score has been given where the sustainability audit has shown that the objective has improved, remained the same or worsened against the baseline review.
- 4.41 Overall, this assessment has shown that six of the objective's effects have worsened from the review of the baseline.

**Table 4.1 Outcomes of the Enfield Integrated Impact Assessment**

| <b>Objective</b>                 | <b>Enfield Integrated Impact Assessment Score</b> | <b>Sustainability Audit Review</b> |
|----------------------------------|---|------------------------------------|
| 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              | Significantly 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 |

## 5. SUMMARY AND CONCLUSIONS

- 5.1 The purpose of this Sustainability Audit is to consider if the 'Enfield Local Plan Main issues and preferred approaches' consultation document which includes the draft strategic allocation of **SA45: Land Between Camlet Way and Crescent Way** for the development of 160 residential units would be considered sustainable development.
- 5.2 The audit has established the existing level of provision of community infrastructure (education facilities, healthcare provision, community facilities, sport and recreational facilities and open space and retail) in the locality.
- 5.3 This assessment is intended to respond to the NPPF requirement for achieving sustainable development, as well as the Draft Enfield Local Plan that echoes the NPPF in **Policy SS1** through supporting developments that provide sustainable growth with supporting infrastructure. These policies ensure that new residential developments will be supported by essential infrastructure needs.
- 5.4 Using the GLA population yield calculator, it is possible to estimate that the 160 residential units the allocated site is proposing will increase the population by 460 people.
- 5.5 The audit demonstrates that the current and proposed community facilities that are within a walkable distance, as defined by the National Design Guide from the proposed strategic allocation site are limited. This is reflected in the IMD score for the domain of barriers to housing and services that ranks the area where the allocated site is in the 1st rank of deprivation out of 10.
- 5.6 Within an 800m radius, there are two pre-schools and primary schools and no secondary schools. However, all educational facilities are operating at or near capacity levels with extremely limited scope for providing flexibility and choice or potential for expansion. The increased residential population of the allocated site would put schools over capacity levels in doing so increasing car trips as residents are required to travel further to access schools.
- 5.7 There is no healthcare infrastructure within a walkable distance of the allocated site.
- 5.8 The open and recreational space in the area is limited. While there are several large areas of open space within a walkable distance and the area provides a tennis club and golf clubs,

there are no gyms or swimming pools. The limited offer does not provide for the range of needs that would help to encourage healthy lifestyles and wellbeing.

- 5.9 The allocated site has a PTAL rating score of 1, which shows that there is very poor access to public transport infrastructure. This is also confirmed in the Walkability Index Study that was undertaken in Hadley Wood showing that the average walkability rating was 7.8 which is below the Enfield (24) and London average (60). Due to the poor public transport connections and cycle and pedestrian infrastructure, it is anticipated that there will be an increase in private car trips to reach community infrastructure. This does not help to support sustainable travel or patterns of development.
- 5.10 The Enfield Integrated Impact Assessment assessed the proposed strategic allocation against the 18 objectives for the Borough. Overall, the assessment saw a significant positive benefit to the effect on housing and significant negative effects on water, efficient use of land and materials, biodiversity and landscape and townscape.
- 5.11 Based on the baseline analysis, the sustainability audit justified that sustainable transport, road safety, services and facilities, climate change adoption and climate change mitigation should all be downgraded from the outcome given in the IIA.
- 5.12 This is mainly justified through the area's poor community infrastructure in the areas coupled with poor transport infrastructure which would lead to an increase in the number of private care journeys that would need to occur if the proposed strategic allocation went forward. This goes against the Enfield policy requirement of supporting a modal shift away from private car use. Equally, the Site is currently greenfield land and therefore any development will impact the environmental benefits of the area.
- 5.13 The sustainability audit has confirmed the IMD rating of high levels of deprivation of barriers to housing and services. It has shown that there is a lack of essential community infrastructure and sustainable transport links in the area. This goes against policy requirements for the delivery of homes in a sustainable location and reducing the need for cars.
- 5.14 The report's analysis shows that the strategic allocation could not support **Policy DM DE6 Tall Buildings** and **Policy DM H4 Small Sites and Housing Development** of the draft local plan. This is because these policies rely on the location having a PTAL rating of 4 (or above). Hadley Wood achieved a PTAL score of 1 indicating very poor public transport and poor sustainability.



5.15 Overall, the proposed strategic allocation of **SA45: Land Between Camlet Way and Crescent Way** for the development of 160 residential units would not be considered a sustainable location for development in line with planning policy objectives and the allocation should be removed in future versions of the emerging Local Plan. For the same reason, Hadley Wood is not deemed to be a suitable location for Tall Buildings and should be removed from DM DE6. Policy DM H4 Small Sites and Housing Development requires sites to be highly sustainable and even though Hadley wood has a railway station, this is not sufficient to make the area sustainable and therefore the policy should be amended so it is only applicable to proven sustainable locations.