

Hadley Wood Neighbourhood Planning Forum
Representation to Regulation 19 Enfield Local Plan

Attachment 1

Representation by Troy Planning



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Our ref.: THP855

Dear Robert,

Enfield Local Plan: Regulation 19 Consultation

Introduction

1. Thank you for asking Troy Planning + Design to prepare representations to the Enfield Local Plan on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Forum. For the benefit of Enfield Council, this represents a continuation of our work with you, which has included the provision of support on the Hadley Wood Neighbourhood Plan and the making of representations to the Regulation 18 consultation on the Local Plan in September 2021.
2. The previous representations focused on the proposed allocation of land at Camlet Way and Crescent West in Hadley Wood which, at the time, were referenced in the emerging Local Plan as Site Allocation SA45. Despite those representations as well as extensive representations submitted by other parties, not least the GLA, the proposed allocation is retained in the Regulation 19 version of the Local Plan, now referenced as Site Allocation RUR.02 in Table 8.1. These representations are focussed on this allocation.
3. The allocation is for 160 homes. It is just one of two housing sites allocated in the Local Plan which are outside the main proposed 'Place making areas' or the existing urban area, the other being land opposite Enfield Crematorium for 291 homes.
4. These representations are set in the context of the most recent version of the National Planning Policy Framework (NPPF) published in December 2023. This makes clear (at para 230) that it applies to the examination of those Plans reaching the Regulation 19 stage after 19 March 2024. Consultation on the Regulation 19 version of the Enfield Local Plan commenced on 28 March 2024. The December 2023 version of the NPPF thus applies and is referred to as appropriate in these representations. In particular, the approach to the retention of the Green Belt has been strengthened in the NPPF.
5. Para 145 of the NPPF makes clear that:

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There is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.

6. And at para 146

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

7. This position is also made clear in the London Plan and to which the Enfield Local Plan must demonstrate conformity. Policy G2 of the London Plan states that:

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

Exceptional Circumstances Topic Paper

8. There is no evidence to suggest that exceptional circumstances exist that would support the release of site RUR.02 from the Green Belt.

9. A 'Green Belt Exceptional Circumstances Topic Paper' (March 2024) has been prepared by Enfield in support of the Local Plan. This has a focus on the strategic releases of Chase Park and Crews Hill from the Green Belt, with very limited reference made to land in Hadley Wood. Indeed, the conclusion doesn't even mention site RUR.02 by name, simply stating:

The two other housing sites are sustainably located, and again, will make a significant contribution to the delivery of more affordable and family homes.

10. The 'two other sites' referred to are Site RUR.02 and land opposite the Enfield Crematorium which, together, are allocated for a total of 451 homes. This equates to little more than 1% of the housing requirement for the Plan period. There is no case that can be made that justifies how this makes 'a significant contribution' to the delivery of new homes.

11. The case for exceptional circumstances made by Enfield revolves around the following section headings in the Topic Paper:

i. Need for more housing, in particular affordable homes and family homes.

12. The case here is that release of land from the Green Belt will help meet identified housing needs including 'an appropriate mix of housing types for the local community' (para 4.26 of Topic Paper). The Topic Paper states that the local need is for family and affordable housing. However, the Housing Market and offer in Hadley Wood differs, considerably, to that across the Borough, and it does not necessarily lead that what is true for the Borough also applies to Hadley Wood.

13. The Hadley Wood Neighbourhood Plan was 'made' as recently as November 2023. This states that the mix of house sizes in Hadley Wood is already very heavily skewed towards larger homes and that there is a limited supply of smaller and affordable

housing that is appropriate for families, younger people in Hadley Wood looking to own their first home in the area, and for people looking to downsize. The Plan specifically states that *'developers are encouraged to engage with the local community, who have expressed a need for downsizing opportunities and sheltered housing'*. In contrast to the Exceptional Circumstances Topic Paper, the 'local need' in Hadley Wood is not specifically for family housing, and thus release of the site will not contribute towards this.

14. Reference to the Neighbourhood Plan is important. The Regulation 19 draft Local Plan states that the new Local Plan *'will sit alongside the newly adopted Hadley Wood Neighbourhood Plan (2023), which now forms part of the development plan for Enfield. Development proposals within the Hadley Wood area will be assessed using the new ELP, as well as the Neighbourhood Plan.'* By extension, the policies in the Neighbourhood Plan, the aspirations expressed in this and the evidence underpinning it must be used to help inform an appropriate strategy for Hadley Wood in the Local Plan. This isn't the case – the Neighbourhood Plan makes clear its intent to reinforce the Green Belt around Hadley Wood and the special qualities of this in terms of its setting, contribution to local character and identity, historic importance and relationship with the built form. This is not reflected in the Local Plan.
15. Furthermore, the Local Plan (at Footnote 1 to Table 2.2) states that the minimum housing requirement for Hadley Wood is 160. This statement is incorrect. The Local Plan has not established a housing requirement for Hadley Wood. Rather, it has allocated a site to meet the wider housing requirement for the Borough as a whole. No evidence or disaggregation of data is presented to show how or why a figure of 160 has been specifically set for Hadley Wood. Further, no housing figure has been requested for Hadley Wood by the Neighbourhood Forum. The figure is capacity driven, not a requirement. Reference to the need to meet this figure should be removed from the Local Plan as it is not evidenced, not justified, and not sound.
16. It is recognised there is a significant affordability gap in Hadley Wood. However, and even if it is viable for 50% of the homes on the site to be affordable as required by policy, this only accounts for a very small proportion of the total need across the Borough as a whole. This is emphasised when looking at total housing numbers.
17. The supply of land and sites for housing in Enfield is intended to deliver 34,710 new homes over the Plan period. Site RUR.02 accounts for less than 0.5% of this. Given the very small contribution it makes to the overall supply it has no importance strategically and there can be no justification for release of this land being an exceptional circumstance. Rather, it appears to be helping the Borough 'make up the numbers', so that there is sufficient supply of land for housing. However, and contrary to this, the housing requirement for the Borough set out in Table 2.2 of the Local Plan is for 33,280 homes over the Plan period. This means that the supply of land identified by Enfield exceeds the requirement for new homes by a figure of 1,430. Even without site RUR.02 the remaining allocations would more than meet the required housing figure. There is simply no need for the site to be released from the Green Belt.
18. Exceptional circumstances have therefore not been demonstrated.

ii. Provision of new sustainable communities with wide-ranging benefits

19. This section of the Exceptional Circumstances Topic Paper, as with other sections, has a focus on the critical scale of mass to be created at Chase Park and Crews Hill, where services can be provided to support communities.
20. The Topic Paper refers in this section (see para 4.41), albeit very briefly, to site RUR.02, saying that it (a) can make contributions to provision of family and affordable housing, and (b) is well located in terms of transport and active travel opportunities. In response to these, point (a) should be discounted as it duplicates the previous section of the Topic Paper (see para 4.32). The focus is then on point (b). However, against this, the Topic Paper is incorrect.
21. Whilst Hadley Wood does benefit from provision of a railway station, services are limited. PTAL ratings for the area are calculated as 0-1: the lowest possible. Train and bus services are limited. There is no active travel infrastructure of note that serves the area nor provides safe onward connections to other locations. Hadley Wood does have a local centre but this is very local in nature and ranks as a 'local shopping parade' in the Local Plan hierarchy of centres, putting it in the fifth and lowest tier of the hierarchy. It does not provide the range of services expected to sustain everyday life. The only restaurant in the local centre closed in 2023 and has since changed to a private office. Additional growth will generate further need for services and movements associated with this but, given the lack of active and sustainable travel options, these trips will inevitably be made by car. At the same time there are well-known and recorded congestion issues on Cockfosters Road. There is simply no evidence to suggest that release of this site will help contribute towards the provision of sustainable communities.
22. Exceptional circumstances have therefore not been demonstrated.

iii. Need for increased growth and quality opportunities for employment

23. This part of the topic paper relates to the potential for three sites in the Green Belt to provide new industrial and logistics space related to their proximity to the strategic road network. This is not relevant to site RUR.02.
24. Exceptional circumstances have therefore not been demonstrated.

iv. Harm to the strategic functioning of the Green Belt can be justified and net loss has been minimised

25. This part of the Topic Paper references the purposes of the Green Belt and the contribution that sites proposed for release make to this. There is no reference to site RUR.02 within this section of the Topic Paper. This can only be because release of the site would cause harm to the Green Belt, as clearly demonstrated by the Council's own evidence. Site RUR.02 is identified in the LB Enfield Green Belt study as making a strong contribution to the purposes of the Green Belt. This was covered in length in the representations made to the Regulation 18 consultation version of the Local Plan. Based on the Green Belt study published as of 2020 the representations noted that the Green Belt at Hadley Wood:

- Attained 'strong' contribution scorings for four of the five NPPF Green Belt purposes and is therefore unsuitable for development
- Attained a 'high harm' rating and thus where development would lead to an unnecessary level of harm on the landscape.

26. The Green Belt study has since been updated (LUC for LB Enfield, Green Belt and Metropolitan Open Land Study, Final Report, 2023). The site at Hadley Wood is shown as:

- Contributing strongly to purpose 1 of the Green Belt (check the unrestricted sprawl of the built-up area)
- Contributing moderately to purpose 2 of the Green Belt (preventing neighbouring towns from merging into one another)
- Contributing strongly to purpose 3 of the Green Belt (assist in safeguarding the countryside from encroachment)
- Contributing strongly to purpose 4 of the Green Belt (preserving the setting and special character of historic towns)
- Contributing strongly to purpose 5 of the Green Belt (assist in urban regeneration by encouraging the recycling of derelict and other urban land).

27. As with the 2020 study, land at Hadley Wood is rated as contributing strongly to the purposes of the Green Belt. The harm of releasing site RUR.02 from the Green Belt is rated as 'high'. However, Table 8.1 states that the harm of releasing the whole assessment area is 'very high'. Of particular note, the site specific assessment in Appendix B to the Green Belt study states that, overall, there is a strong distinction between the site and the urban area. It also notes the relationship between site RUR.02 and the adjacent conservation area, and the impact on views out from this.

28. Based on the above, there is no clear rationale for the release of the site from the Green Belt.

29. Furthermore, it is important to recognise that the proposed allocation is on the border of the Borough and thus the Green Belt findings of adjacent Boroughs need taking into account. Again, these were discussed at length in the Regulation 18 representations to the Local Plan. To summarise:

- The LB Barnet Green Belt and Metropolitan Open Land Study assessed land immediately adjacent to site RUR.02 as contributing strongly to the Green Belt and that removal of land from the Green Belt would cause adverse impacts to the landscape and contribution to the Green Belt of land in Barnet. The LB Barnet Green Belt assessment was prepared by the same authors of the Enfield Green Belt assessment.
- The Hertsmere Council Green Belt Assessment undertook a wider than district assessment and included land at Hadley Wood in this. The assessment considered land at site RUR.02 to contribute strongly to all Green Belt purposes and that there should be no further consideration of this site for development.

30. In addition, the site in Hadley Wood lies adjacent to both the Hadley Wood Conservation Area and, in neighbouring Barnet, the Monken Hadley Conservation Area. However, this has not been considered in the Enfield study. This is flawed as it does not consider the adverse impacts on the character and intrinsic value of the Monken Hadley Conservation Area that would be caused by development. The contribution to purpose 4 of the Green Belt and the harm caused by release is thus under-estimated.
31. Despite the above, and its strategic, cross-boundary importance, no reference is made to the Green Belt in the Duty to Cooperate Statement of the Enfield Local Plan (March 2024). It cannot therefore be determined whether the release of Green Belt land is supported or not by neighbouring authorities. In the absence of this, references must be made to representations received in response to the Regulation 18 Consultation.
- LB Barnet expressed concern about the effect of Site Allocation SA45 (now RUR.02) on the openness of the Green Belt as well as impact on the Monken Hadley Conservation Area, stating that the Council will resist proposals which have a harmful impact on the Conservation Area's character and appearance, including its setting.
 - Herstmere expressed concern about Site Allocation SA45, stating that their *'draft Local Plan does not recommend any further consideration of green belt land for development south of the M25 as this part of the green belt is assessed as performing strongly in preventing the outward sprawl of Greater London and avoiding risk of coalescence between London and Potters Bar.'*
 - The GLA expressed significant concerns as to the proposed loss of Green Belt land, stating, in particular, that:
 - *The Mayor has significant concerns as to whether the approach is the right one.*
 - *There appears to be sufficient capacity to meet the required housing target for this local plan without Green Belt sites.*
 - *Bringing forward Green Belt sites at this stage, alongside non-Green Belt brownfield sites, risks undermining brownfield delivery and viability.*
 - *There is no 'brownfield first' approach to mitigate this potential risk and we are concerned that in this context, market responses may not align with the borough's stated aims - with potentially significant impacts on brownfield sites and sustainable development.*
 - *It is the Mayor's opinion that the exceptional circumstances that are required to justify the release of Green Belt land through the Local Plan process have not been established.*
 - *The intention to release Green Belt land is premature.*
 - *We also have some concerns about the suitability of the proposed locations in terms of their sustainability.*
 - *The chosen areas offer very low public transport accessibility and are not within, what is considered to be, a reasonable walking distance to the*

nearest town centre. The Enfield Green Belt and Metropolitan Open Land Study illustrates that many areas proposed for release would cause very high levels of harm to the Green Belt. In addition, low density family housing is proposed in these locations which would not make a significant contribution in meeting the borough's housing needs for this Plan period and beyond.

32. The messages from neighbouring authorities and from the GLA in particular are clear:
- LB Barnet and Hertsmere are concerned about the harmful impact of development on the Green Belt and heritage assets. This has not been addressed in the Regulation 19 version of the Local Plan.
 - The GLA was not convinced that exceptional circumstances for the release of Green Belt land could be justified: that the locations for release were unsustainable, they did not contribute to meeting housing need, and they undermined the delivery of previously developed land. These concerns have not been addressed in the Regulation 19 version of the Local Plan.

33. Exceptional circumstances have therefore not been demonstrated.

v. Provision of opportunities for beneficial use of remaining Green Belt

34. The NPPF states (at para 147) that where land is to be released from the Green Belt that Local Plans should '*also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*'.
35. The Topic Paper seeks to use opportunities for making improvements to the Green Belt as a reason in support of the case to justify exceptional circumstances. This is wrong. Delivery of compensatory measures does not of itself contribute to demonstrating exceptional circumstances, but is rather an action that should be taken after exceptional circumstances have been proven and land identified for release.
36. Not only have exceptional circumstances not been demonstrated in respect of Site RUR.02, but compensatory measures are directed away from the site to other parts of the Borough.
37. The Local Plan sets out specific projects for improvement to the Green Belt, including those at Enfield Chase and the Lee Valley Regional Park. Neither of these relate to and indeed are removed from Site RUR.02. There is no direct access to these for existing or potential future residents of Hadley Wood. The improvements to the Green Belt are strategic in nature and respond in scale to the major placemaking proposals related to the release of land at Chase Park and Crews Hill, as well as wider releases from the Green Belt for employment purposes. They do not offset the impacts of removing land from the Green Belt at Hadley Wood and make no local enhancements nor accessibility improvements.
38. Exceptional circumstances have therefore not been demonstrated.

vi. Housing Land Supply

39. A key part of the Exceptional Circumstance test is the requirement for LB Enfield to demonstrate that it has examined all other reasonable options for meeting its housing requirement before consideration is given to release of Green Belt land.
40. The NPPF (at para 146) says that the examination of the Local Plan will consider whether as much use as possible has been made of previously developed land and under-utilised sites, and whether opportunities to optimise the density of development, particularly in town and city centres, have been taken. Plainly, these steps haven't been taken. The Enfield Capacity Study has not been updated since 2020 and no further evidence has been published to demonstrate that alternative sources of supply have been assessed. Until such a time as this has been undertaken LB Enfield cannot conclude that exceptional circumstances exist to justify changes to the Green Belt.
41. The Exceptional Circumstances Topic Paper 2024 published by LB Enfield states, at para 4.10, that it has '*conducted multiple call for sites exercises, to seek to identify as many potential development sites as possible*', and therefore, it has '*made as much use as possible for suitable brownfield sites and underutilised land*'. This argument is flawed. There is no guarantee that the Call for Sites process will result in previously developed land or under-utilised sites being submitted. Rather, the responsibility for identifying and unlocking such sites lies with the Council. Para 125 of the NPPF states:

'Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.'
42. There is no evidence to suggest that LB Enfield has taken such a proactive approach. The Council claims that the Urban Capacity Study is a 'deep dive' (see para 4.15 of Exceptional Circumstances Topic Paper). It is not. The study itself acknowledges that this is not the case and that it is only 'a snapshot in time', (see para 3, New Enfield Local Plan 2041, Capacity Study, Aecom, February 2020), and that it can and will be gradually superseded. It hasn't been.
43. The Exceptional Circumstances Topic Paper makes reference to the Small Sites Research LB Enfield published in January 2019 in response to the small sites housing target in the draft London Plan. The document stated that the Council '*is not prepared to accept the target unless there is compelling evidence that it could be achieved*' (para 1.6). This position is to be noted as it is the contention of the Hadley Wood Neighbourhood Forum that LB Enfield has not produced compelling evidence in support of its own Local Plan.
44. Appendix C to the Local Plan includes site proformas for all allocated sites. For Site RUR.02 in Hadley Wood this makes clear that delivery of the site is not phased until after the first ten years of the Plan (it is shown as being delivered in years 10+ in Table C1.145). The site is thus not relied upon and not necessary to contribute towards the

immediate five year supply of land required to meet housing needs in Enfield. In terms of the exceptional circumstances for Green Belt release, it does not therefore make a significant contribution to the delivery of housing.

45. Para 69 (b) of the NPPF makes clear that there is no need for specific sites for development to be identified in years 10+ of the Local Plan period. Instead, the NPPF uses the words *'where possible'*. Planning Practice Guidance says that where sites are not included in the Local Plan for years 10+ this does not impact on the ability of the Local Plan to demonstrate that it has satisfied the tests of soundness (as set out in Paras 35 and 36 of the NPPF). More importantly, it states that where sites in the 10+ year period are included in the Local Plan, then *'plan-makers will need to demonstrate that there is a reasonable prospect that they are likely to come forward within the timeframe envisaged'* (Planning Practice Guidance, Housing Supply and Delivery, Paragraph: 019 Reference ID: 68-019-20190722).
46. The Local Plan seeks to release a site from the Green Belt when there is no justification for this:
- Exceptional circumstances have not been demonstrated.
 - The site performs strongly against the purposes of the Green Belt.
 - The site is not needed nor relied upon to deliver homes in the first ten years of the Plan, and thus has no impact on the ability to demonstrate a five year supply of land for housing, and does not make a 'significant contribution' to housing delivery.
 - There is no requirement for a review of the Green Belt boundary in this location

Growth Topic Paper

47. The Enfield Local Plan Growth Topic Paper (May 2021), which has not been updated since the Regulation 18 version of the Local Plan was consulted upon, links the release of Green Belt land with the need to meet development needs, stating, at para 6.16, that:
- 'The level of growth is such that the Borough has had to rely on limited areas of the Green Belt to meet development needs, particularly if housing needs are to be met in full. This has resulted in the strategy directing growth in Crews Hill (an existing settlement) and Chase Park as an extended area of Enfield Chase; a new burial and memorial ground with associated facilities at Sloemans Farm for natural burials; and three sites for employment related uses. Whilst in Green Belt, these locations still support a pattern of planned and sustainable growth that offer opportunities for mitigation and compensatory improvements'.*
48. As before, LB Enfield does not make any reference to site RUR.02 in justifying the approach to growth taken in the Local Plan. The inference is that allocation of the site cannot be justified and does not meet the exceptional circumstances. The absence of any supporting reasons for release of the site must indicate that the site is not relied upon, and therefore not necessary, to meeting the scale of growth set out in the Local Plan. Minor reference is made in para 6.28 of the Growth Topic Paper to release of land

at Site RUR.02 helping to support ‘a continuation of town-wide transformational changes and renewal’. This statement is included in the Topic Paper without any context. Put simply, there have not been and are not planned to be any transformational changes nor renewal projects in Hadley Wood. This does not provide any justification for release of the site from the Green Belt.

49. The Growth Topic Paper includes a chapter on the approach to Green Belt land which extends to eighteen pages. It makes no reference to site RUR.02, focusing, instead, on the release of land from the Green Belt at Chase Park (PL10) and Crews Hill (PL11). Table 8.1 of the Local Plan (under Policy H1) lists all site allocations and the estimated capacity of these. The ten ‘strategic place’ allocations (PL1-8, & 10-11) are shown as having capacity to accommodate almost 23,000 homes over the Plan period, with a further 3,200 beyond this. The reference here to ‘estimated capacity’ is important. Given the scale of growth envisaged across the ‘strategic places’ it is inevitable that as proposals evolve so the opportunity to accommodate additional homes will increase. Indeed, very minor changes to the density assumptions undermining the capacity estimates could result in very different calculations and potential housing numbers that could be accommodated on these sites, and which could more than offset any supply lost from deletion of Site allocation RUR.02 from the Local Plan. The scale of new homes proposed at Site RUR.02 is very minor compared to the large scale change proposed elsewhere across the Borough and does not in any way represent a ‘significant contribution’ to the housing supply.

Site Allocations Topic Paper

50. The Site Allocations Topic Paper (March 2024) states, in para 2.4, that where it has been determined that Green Belt land needs to be released for development, then, in line with para 147 of the NPPF, consideration should first be given to that Green Belt land which has been previously developed and, or, is well served by public transport. The Topic Paper goes on to clarify, at para 5.4, that:
- Where Green Belt sites have been considered the most accessible Green Belt sites have been considered first, in line with the spatial strategy. However, to further refine the selection of the most accessible Green Belt sites, a brownfield first approach was taken on these sites to prioritise selection of previously developed land.*
51. It is not clear how this has been followed in order to determine that the site RUR.02 is appropriate for development. It does not perform well against these considerations. It does not comprise previously developed land in the Green Belt and, although in good proximity to a station, is not well served by public transport. As noted above, PTAL ratings for Hadley Wood are the lowest they can be.
52. Indeed, the Appendix to the Site Topic Paper sets out the method for selecting sites for allocation. In Table 3 it shows how sites have been prioritised, using a traffic light system to indicate the better performing sites and locations for development. For ease of reference, Table 3 has been extracted and copied below.

Priority	Broad Site location	Site typology	Approach to Allocation
1	Sites within the urban area	Brownfield sites in urban area	Allocation, subject to other stages
2		Greenfield sites in urban area	Allocation, subject to other stages
3	Accessible Green Belt sites	Brownfield sites in accessible ⁷ Green Belt location	Potential allocation possible, subject to alignment with emerging spatial strategy
4		Greenfield sites in accessible, lower performing Green Belt location	Potential allocation possible, subject to alignment with emerging spatial strategy
5		Greenfield in accessible, moderately performing Green Belt location	Potential allocation less likely, unless exceptional circumstances
6		Greenfield in accessible, high performing Green Belt location	Potential allocation less likely, unless exceptional circumstances
7	Isolated Green Belt Sites	Brownfield in isolated Green Belt location	No allocation unless exceptional circumstances
8		Greenfield in isolated low or moderately performing Green Belt location	No allocation unless exceptional circumstances

Extract from Appendix to the Site Allocations Topic Paper (March 2024) showing the hierarchy used for allocating sites in the Regulation 19 version of the Local Plan

53. Table 3 shows, as green, sites in urban areas which are identified as being appropriate for allocation. Green Belt sites are split into two main categories: those that are ‘accessible’ and those that are ‘isolated’. The question here is how the term ‘accessible’ is defined. If it is in terms of proximity to an existing settlement area then site RUR.02 falls within the ‘accessible’ category. If however it is based on public transport accessibility then it must be considered an ‘isolated’ site. Indeed, the Green Belt Study (2023) defines the site as being ‘isolated’. In either eventuality, there are further sub-categories which order Green Belt sites in terms of preference, with previously developed sites in accessible locations (as defined by PTAL rating, as clarified in the footnote to Table 3) being prioritised above those in less accessible sites in highly performing Green Belt locations. Against this latter category, Table 3 states that, for accessible sites, ‘potential allocations less likely, unless exceptional circumstances’. For isolated green field sites it states ‘no allocation unless exceptional circumstances’. This category of site is highlighted ‘red’ in the traffic light assessment. However, Site RUR.02 does not sit within any of these categories and in fact a new ninth category that sits below this list should be established for sites that are:

- Located in the Green Belt.
- Are classified as isolated Green Belt sites, as defined in the Green Belt study.
- Are high performing Green Belt locations, as assessed in the Green Belt study.
- Are ‘inaccessible’ sites poorly served by public transport, as confirmed by PTAL ratings.

54. Site RUR.02 in Hadley Wood should be classified as falling within this category. This combination of factors makes it the lowest priority site typology and where sites should not be allocated as exceptional circumstances have not been proven.

55. Table 7 of the Appendix to the Site Allocations Document presents the justification for allocating sites in the Regulation 19 version of the Local Plan. For site RUR.02 it claims that:

The Site... has excellent access to public transport – being directly adjacent to Hadley Wood Station

The site is at the edge of the urban area and has good access to public transport being around 5 minutes' walk from Hadley Wood station and local bus routes

56. The second of these two points directly contradicts the first. The site is not immediately adjacent to Hadley Wood Station. More importantly, neither the presence of a station nor bus routes implies good public transport services. The criteria listed in Table 3 (referenced above) define accessibility in terms of PTAL rating. This has simply been disregarded in the justification set out in Table 7. This is made quite clear on page 16 of the Character of Growth study (Revision B, February 2024) prepared by LB Enfield which states that *'forces of change'* (i.e.: those locations where growth and change should be directed to) in locations close to a station are considered to be high *'to take account for inaccuracies within PTAL and irregularities where highly connected places are not represented (Meridian Water station and surrounds)'*. There are two issues with this statement: (1) Meridian Water is a strategically important regeneration area that will contribute towards transformational change in this part of the Borough and, although PTAL is currently low, substantial funding has been committed towards the delivery of a new and improved station which will significantly improve public transport accessibility; (2) such an approach has no relevance to Hadley Wood where the context is entirely different and where arbitrary manipulation of key planning data has been undertaken to support a growth scenario where there is no justification for this. Put simply, Site RUR.02 does not have accessibility to good public transport services and there are no planned improvements to public transport services for Hadley Wood that would feasibly increase the PTAL rating over the life of the Plan.
57. Site RUR.02 in Hadley Wood performs poorly against the criteria for allocation. In short, allocation against these cannot be justified.
58. The allocation of site RUR.02 is also contradicted in the Integrated Impact Assessment (2024) which outlines the approach to identifying reasonable alternative sites and preferred approaches. This states at para 2.54 (and in reference to Table 3 extracted and copied above) that:
- "After applying the hierarchical approach in Stage 2, only sites assessed as priority 7 and 8 (i.e. isolated Green Belt locations) were ruled out as not being reasonable alternatives"*
59. Further contradictions in the Council's own evidence are to be found in the assessment of land put forward through the Call for Sites process. The 2020 version of the SHLAA states that site RUR.02 is 'potentially suitable' This is despite the method statement within this, and which is repeated in Appendix C to the 2023 HELAA, stating the site should be considered unsuitable. In terms of those sites in the Green Belt or Metropolitan Open Land (e.g.: Site RUR.02), the method statement for assessment contained in the HELAA makes clear that:

“Sites where the Green Belt and Metropolitan Open Land assessment suggests land makes a lower contribution to the purposes of Green Belt have been generally be deemed ‘potentially suitable’ with regards to this factor. Sites where analysis suggests the land makes an important contribution to the purposes of Green Belt will generally be deemed ‘unsuitable’. (Exceptions might occur for sites which are previously developed, where there are specific industrial requirements, where development would support community aspirations or where there are specific sustainability benefits.)”

60. Against this, the Green Belt study makes clear that site RUR.02 performs strongly against the purposes of the Green Belt, is not a previously developed site, and there are no other exceptions as included in the brackets above. As such, and following the method set out, site RUR.02 should have been deemed ‘unsuitable’ in the HELAA.
61. Appendix C to the HELAA goes on to explain which delivery timeframe sites should fall within. For those sites in years 6-10 and 10+ of the Plan period, the HELAA states that these are sites that are in a ‘suitable location for defined use’. Site allocation RUR.02 is phased in the Local Plan as being delivered in years 10+. However, application of the suitability criteria in respect of Green Belt sites outlined above means site RUR.02 cannot be considered a suitable location.
62. In summary, it is clear that the Council’s own evidence states that site RUR.02 should not have been taken forward as an allocation.

Integrated Impact Assessment

63. The Integrated Impact Assessment (IIA) of the Regulation 19 version of the Local Plan (LUC for LB Enfield, March 2024) incorporates a Sustainability Appraisal. For clarity, the site allocation in Hadley Wood is referenced as Site R.02 in the IIA as opposed to Site RUR.02.
64. Table 6.8 of the IIA summarises the findings of the assessment of all allocated sites against sustainability indicators, of which there are 39 in total (comprising main and sub-indicators). It suggests that 33 of the indicators are applicable to the assessment of site RUR.02. Against these it indicates that:
 - The site is expected to result in a significant negative effect against fourteen of the indicators.
 - The site is expected to result in a minor negative effect against eight of the indicators.
 - The site is expected to have a negligible effect (neither negative nor positive) against five of the indicators.
 - The site is expected to have a minor positive effect against two of the indicators.
 - The site is expected to have a significant positive effect against three of the indicators.
65. In percentage terms, the site is expected to have a negative effect (significant or minor) against 67% of the indicators that are considered applicable to the site. By contrast, it is only expected to have a positive effect (minor or significant) against 15% of the

indicators. This makes a compelling case against allocation of the site. In terms of those indicators against which the site is considered to result in a positive effect:

- It is considered to result in a significant positive effect against delivery of new homes (Indicator 3). In isolation, it will, though the assessment process is rather simplistic, simply clarifying in the Appendix to the IIA that any site with capacity to accommodate more than 100 homes will have a major positive effect. It makes no comment against local needs and mix, nor delivery timeframes for the sites.
- The site is considered to result in a significant positive effect in terms of access to recreation (Indicator 4c) but, at the same time, it is also shown as having a significant negative effect on loss of recreation (Indicator 4c). It is entirely unclear how it can result in both positive and negative effects. The Appendix to the IIA simply states that a major positive effect is applied where a site is within 800m of open space. This is overly simplistic. The site is of course in close proximity to open space but it is the development of the site that is the issue here as it will result in the loss of undeveloped open space and this must outweigh any positive rating.
- The site is considered to result in a significant positive effect in terms of services and facilities (Indicator 12b). However, it only results in a minor positive effect against services and facilities (Indicator 5) and town and local centres (Indicator 10). It is entirely unclear how the assessment can jump from a minor positive effect to a significant positive effect within what is effectively the same category. Furthermore, the site is assessed as having a minor negative effect against GP Surgeries (Indicator 4a), which undermines the positive rating it receives against services and facilities in Indicator 5. It can only be concluded that the assessment against Objective 12b is overly positive.

66. It is clear from this that many of the scores set out in the IIA are unduly generous. Against all other applicable indicators site RUR.02 scores poorly, notably in terms of sustainable transport (Indicator 12a). Indeed, the Appendix to the IIA confirms that a site is considered to result in major negative effects where it is located in a PTAL 0, 1a or 1b area, i.e.: the lowest PTAL ratings. This further contradicts the Site Allocations Topic Paper which claims site RUR.02 has good public transport accessibility and is thus why it has been allocated.
67. Site RUR.02 also performs poorly against indicators in relation to biodiversity (Indicator 13), heritage (indicator 14), Landscape (Indicator 15), the efficient use of land and materials (Indicator 16), Flooding (Indicator 17) and Water (Indicator 18). These findings correlate with the findings of the Green Belt study and the strong performance of the site against the purposes of the Green Belt. However, the IIA makes no specific reference to Green Belt in its assessment of allocations in Table 6.8. It is unclear why this has been omitted.
68. There is nothing in the IIA to explain how and why a site that performs so poorly against the indicators can justifiably be allocated for development in the Local Plan. In particular:

- In terms of Indicator 14 (Heritage) it is to be noted that Site RUR.02 is located in the Enfield Chase and Camlet Moat Archaeological Priority Area which is classified as a high risk area and where development would likely cause significant harm to heritage assets of archaeological interest. It is also, as noted previously, adjacent to both the Hadley Wood and Monken Hadley Conservation Areas and where development would cause harm to the setting of those.
- In terms of Indicator 15 (landscape) it is important to draw attention to the harm that development would cause to the landscape. Site RUR.02 is located within an Area of Special Character and part of the allocation area is within a Site of Borough Importance for Nature Conservation. Furthermore, it is located within the 'Famland Valleys and Ridges' character area which the Enfield Characterisation Study (2011) describes as '*a major asset for the borough. It is of both landscape and historical significance*' and where '*the existing Green Belt boundary should be retained and protected, and future development and land use changes resisted*'. This is expanded upon in the Responses made to the Regulation 18 version and which still holds true. That noted that the Area of Special Character was only designated as recently as 2013 because of its unique and historic landscape value. There have been no changes since 2013 that would suggest these qualities have changed and, as such, release of Site RUR.02 would cause conflict with and harm to its special qualities.
- In terms of Indicator 17 (Flooding), part of the site is located within Flood Zone 3. The NPPF makes clear (at para 168) that new development should be steered 'to areas with the lowest risk of flooding from any source'.

69. In short, the one and only indicator that the site scores strongly against is housing (Indicator 3). However, this does not outweigh the negatives associated with the site and, as noted above, delivery of housing is not phased until later periods in the Local Plan, and thus where positive effects will not be felt for a long time, and where exceptional circumstances for the release of this site from the Green Belt have not been evidenced nor justified.

Conclusions

70. The representations made to the Regulation 18 version of the Local Plan in respect of Site Allocation RUR.02 in Hadley Wood (previously Site Reference SA45) remain relevant. This letter supplements the Regulation 18 representations, reviewing more recent material made available through the Regulation 19 consultation of the Local Plan and all supporting documents. It finds that the proposed allocation of Site RUR.02 is not justified. In summary:

- a) The NPPF makes clear that there is no requirement for Green Belt boundaries to be reviewed as part of the Local Plan. Where boundaries are to be reviewed this should only be undertaken where the Local Authority can demonstrate that exceptional circumstances can be fully evidenced and justified. This is not the case with Site RUR.02. No exceptional circumstances have been evidenced and justified.

- b) The Exceptional Circumstances Topic Paper makes only very limited reference to Site RUR.02, stating that it will make a significant contribution to delivery of family and affordable homes, and that it is well located in terms of transport and active travel. Neither is correct:
- i. The site is allocated for 160 homes against a Local Plan requirement for 33,280 homes over the Plan period, accounting for just 0.5% of the total requirement. This does not in any way represent a significant contribution.
 - ii. The site is phased for delivery in years 10+ of the Local Plan. There is plainly no need for it to come forward to meet the five year supply of land for housing and contribute to the urgent delivery of homes. Again, this does not represent a significant contribution to the delivery of new homes.
 - iii. In any event, the supply of land for housing in the Local Plan (34,710 new homes) exceeds the housing requirement (33,280 homes). The requirements can be met without Site RUR.02.
 - iv. The simple statement that the site can meet needs for family housing does not reflect the reality of the local housing market and the actual housing needs in Hadley Wood.
 - v. Active and sustainable travel options in Hadley Wood are limited, with measures of PTAL showing that Site RUR.02 has the lowest PTAL rating, and is therefore not well located in respect of transport and active travel.
- c) The site is assessed as performing strongly against the purposes of the Green Belt and development of the site is assessed as leading to a high level of harm to the Green Belt. The site is on the edge of the LB Enfield borough boundary and the findings of Green Belt assessments in adjacent boroughs must also be considered. These also note that the immediately adjacent land contributes strongly to the Green Belt and that removal would cause adverse impacts. Indeed, the SHLAA and more recent HELAA state that sites which make an important contribution to the purposes of the Green Belt are deemed unsuitable for allocation.
- d) It has not been demonstrated that all other sources of supply have been exhausted before Green Belt sites are considered for allocation. There is no evidence to suggest that a proactive approach has been taken to unlocking opportunities for development as required by the NPPF, particularly in respect of public-sector owned land and opportunities for intensification.
- e) The Local Plan Growth Topic Paper makes no specific reference to justify the allocation of Site RUR.02, beyond a very limited reference to development supporting opportunities for town-wide transformational changes and renewal. There are however no such changes or initiatives in Hadley Wood and, indeed, the size of development is highly unlikely to generate the critical scale of mass and developer contributions necessary to support any 'transformational changes'.

- f) The Site Allocations Topic Paper makes clear that isolated Green Belt sites are the least preferred and lowest priority sites for allocation. Site RUR.02 should in fact rank below this as not only is it a Green Belt site but it is an isolated Green Belt site with low accessibility and which performs strongly against the purposes of the Green Belt. However, the same paper justifies allocation because it is claimed that the site has excellent access to good public transport. It does not. The justification given in the Site Allocations Topic Paper is undermined by the Integrated Impact Assessment which shows the site performs poorly in terms of sustainable transport.
- g) The Integrated Impact Assessment makes a compelling case against allocation of the site, showing it to result in negative effects against the majority of indicators

71. The evidence prepared in support of the Local Plan makes clear that Site RUR.02 is unsuitable for allocation:

- The site performs strongly against the purposes of the Green Belt.
- Release of the land and development of the site would cause harm to the Green Belt.
- The site is isolated.
- Sustainable and active transport access is poor and provision of local services and facilities is limited.
- The site performs poorly against Sustainability Indicators, resulting in negative effects against these.
- The site has not been shown to be deliverable.
- The site does not contribute to the five year supply of land for housing.
- The site does not make a significant contribution to the delivery of housing.

72. No case has been made to support the allocation of the site and release from the Green Belt. In terms of the tests of Local Plans as set out in para 35 and 36 of the NPPF, the proposed allocation is not justified, not consistent with national policy, and not sound. Site allocation RUR.02 should be removed from the Local Plan. Alongside this, reference to a housing requirement of 160 homes for the Hadley Wood Neighbourhood Plan area should also be removed from the Local Plan as this is not evidenced, not justified, and not sound.

Yours sincerely,
for Troy Planning + Design

Jon Herbert

Director



