

**Hadley Wood Neighbourhood Planning Forum**  
**Matter 5 – spatial strategy & site allocation methodology**

Question	Comments
5.7	<p>Yes, the Plan includes development in Flood Zones 2 and 3, and we are not aware of the exception test having been carried out.</p> <p>The Consultation Statement states that the Environment Agency “<i>recomends [sic] that Site RUR.02 specifically be classified within Flood Zone 2 and Flood Zone 3. Appendix C states this is FZ1 (page 511). This is incorrect</i>” (doc <a href="#">SUB12.1</a>, page 452).</p> <p>The Hadley Wood Neighbourhood Plan uses the terms ‘flood’ and ‘flooding’ 143 times, reflecting that it is a material issue in the area. Site RUR.02 has for decades been used to keep horses, and has been undeveloped grassland for centuries. The photo on the HWNPF’s website (<a href="https://www.hadleywoodnp.co.uk/localplan">https://www.hadleywoodnp.co.uk/localplan</a>) shows the meaningful gradient of the site, and rainwater drains into Monken Mead Brook, classified as a ‘main river’, which runs through the site. Large scale development of the land will inevitably increase the risk of surface water flooding downstream, including at the A111 Cockfosters Road, which already floods during heavy rainfall – see photo on page 61 of the Neighbourhood Plan (rep. <a href="#">01311-8-1</a>).</p> <p>The above was covered in paras 9.1.2 and Appendix B of the HWNPF Representation (<a href="#">rep.01311-1-1</a>). The impact on the residents of Hadley Wood is that development of RUR.02 increases the flooding risk downstream, and the allocation should be deleted.</p>
5.11	<p>Yes, the Regulation 19 representations of both Transport for London and National Highways expressed concerns on transport matters (rep. <a href="#">01891-3-1</a> and <a href="#">01753-1-1</a>) regarding RUR.02.</p> <p>The recently published Transport Topic Paper explicitly states that TfL “<i>do not believe that sites [...] and RUR.02 are suitable sites for housing because of the very poor transport connectivity and the exceptional costs that would be incurred in providing access by sustainable modes of transport to a standard that would make them comparable to urban housing sites in the borough. If these sites were to come forward, they are likely to result in car dependent development contrary to the Good Growth objectives of the London Plan and the NPPF</i>” (doc <a href="#">E3.5</a>, Table 5-2).</p> <p>The also recently published SoCG with National Highways lists the impact of the Local Plan on M25 Junction 24 as an outstanding matter (doc <a href="#">SUB14a</a>, slide 163, para 5.1).</p> <p>The above was covered in paras 8.24.11, 8.24.16 and Appendix B of the HWNPF Representation (<a href="#">rep.01311-1-1</a>). The impact of the proposed developments on current Green Belt land on the residents of Hadley Wood will be material. As detailed in our response to Q1.5, aside from TfL and National Highways expressing concerns, the Council’s Baseline Transport Review indicated that roads along Hadley Wood already operate at over 100% of capacity at peak times (Figures 3-11 and 3-12 of doc <a href="#">TRA8</a>). In the absence of planned infrastructure improvements to avoid gridlock the traffic situation will become deeply problematic, with serious consequences for pollution and highway safety. The allocation of RUR.02 is unsound and should be deleted.</p>

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5.12	<p>Allocation of RUR.02 is not consistent with national policy in respect of air quality.</p> <ul style="list-style-type: none"> <li>▪ The 2021 <a href="#">HELAA</a> stated that the site is “<i>located some distance from amenities</i>” (Evidence Base, <a href="#">Homes for All</a> section, <a href="#">document</a>, site ‘COC8’ and ‘LP465’). The 2023 submitted version has removed the ‘Access to Local Services’ assessment (HELAA potential sites Part 3, doc <a href="#">HOU4</a>, site ‘COC8’).</li> <li>▪ The IIA scores RUR.02 negatively for air pollution but positively for services and facilities (doc <a href="#">SUB 8</a>, pg 155, site referred to as ‘R.02’). The latter is surprising, in light of the above-mentioned comment in the HELAA, and the HWNPF’s representation notes the lack of an NHS dentist or GP, pharmacy, post office, bank, library, secondary school, supermarket, bars and restaurants and indoor leisure facilities (<a href="#">rep.01311-1-1</a>, para 9.2.3).</li> <li>▪ The GLA’s representation notes that the Green Belt sites are car-dependent (<a href="#">rep. 00120-1-1</a>, page 7).</li> <li>▪ TfL’s representation states that RUR.02 “<i>has a PTAL 1 and it is unlikely that further public transport and/or active travel improvements could be provided at a level that would be necessary to support the proposed 160 homes</i>” (<a href="#">rep. 01891-3-1</a>, page 37).</li> </ul> <p>The above was covered in paras 8.20.5, 8.20.6, 8.24.11 and Appendix B of the HWNPF Representation (<a href="#">rep.01311-1-1</a>). The impact of development of RUR.02 on the residents of Hadley Wood will be increased air pollution, which is totally avoidable by focusing on brownfield sites and speeding up the Meridian Water development - even though the Council started exploring Meridian Water in 2009 and the Plan repeatedly mentions ‘10,000’ new homes being built, only 6,711 are included in the Plan to 2041 (doc <a href="#">SUB2</a>, paras 3.68 &amp; 3.75). The allocation of RUR.02 should be deleted.</p>
5.13	<p>The Plan fails to consider the provision of adequate infrastructure and local services for site RUR.02.</p> <ul style="list-style-type: none"> <li>▪ The Spatial Strategy and Overall Approach Topic Paper states that “<i>The infrastructure needed to support the Spatial Strategy and associated site allocations is set out in the Infrastructure Development Plan</i>” (doc <a href="#">TOP1</a>, para 7.26).</li> <li>▪ Neither the ‘Emerging Infrastructure Delivery Plan’ nor the ‘Infrastructure Development Plan – Transport’ mentions any projects or improvements affecting Hadley Wood (docs <a href="#">IDP1</a> and <a href="#">IDP2</a>), and the Housing Topic Paper explicitly states that there are no infrastructure schemes that could provide additional capacity (doc <a href="#">TOP3</a>, para 2.52).</li> <li>▪ The IIA states in respect of Hadley Wood that “<i>It is possible that new services and facilities and transport links such as bus routes or cycle paths will be provided as part of new developments, particularly at larger sites, but this was not assumed in assessing site options</i>” (doc <a href="#">SUB 8</a>, page F-24, para F.38).</li> <li>▪ The recently published Transport Topic Paper states that TfL “<i>do not believe that sites [...] and RUR.02 are suitable sites for housing because of the very poor transport connectivity and the exceptional costs that would be incurred in providing access by sustainable modes of transport to a standard that would make them comparable to urban housing sites in the borough. If these sites were to come forward, they are likely to result in car dependent development contrary to the Good Growth objectives of the London Plan and the NPPF</i>” (doc <a href="#">E3.5</a>, Table 5-2).</li> </ul>

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	<p>The above was covered in paras 7.4.3 and 8.24.10 of the HWNPF Representation (<a href="#">rep.01311-1-1</a>). The impact on the residents of Hadley Wood is that it will add pressure on the very limited local amenities (the primary school is oversubscribed and the headteacher has indicated that it is not allowed to expand as there are spaces elsewhere in the borough). As amenities (NHS GP, dentist, pharmacy, educational facilities, bank, post office, supermarket, indoor leisure facilities, etc) are not accessible via active travel, and local public transport accessibility is very poor (PTAL 1b, with the only bus service being hourly between 10am and 2pm to a final destination 7 minutes away – featured in YouTube video '<a href="#">London's least used bus route – the 399</a>'), TfL's assessment is accurate – development of RUR.02 will “<i>result in car dependent development contrary to the Good Growth objectives of the London Plan and the NPPF</i>“. The allocation of RUR.02 should therefore be deleted.</p>
5.15	<p>The robustness of the Whole Plan Viability Assessment ('WPVA') is unclear to us. For example:</p> <ul style="list-style-type: none"> <li>▪ it appears to only have tested greenfield developments of up to 10 units, not 160 dwellings, as proposed for RUR.02. Also, the densities are multiples of what is presented for RUR.02 (doc <a href="#">VIA1</a>, page 145 ff).</li> </ul> <p>The residents believe the Plan deliberately understates the proposed number of housing units to be built on RUR.02. Based on the 11ha gross plot size and using the density proposed for Chase Park (<a href="#">PLA1</a>, pg 41), the number of dwellings could be as high as 500. In the absence of any planned infrastructure improvements that would not represent sustainable development.</p> <ul style="list-style-type: none"> <li>▪ The conclusions with respect to Crews Hill are contradictory. Paras 12.65 and 12.66 state that, because of the land's current use as garden centres etc, in a mid-level policy scenario it can bear 40% affordable housing. However, the final summary in para 12.108 states that “<i>Chase Park and Crews Hill are likely to be able to bear 50% affordable housing</i>”.</li> </ul> <p>The issue is important as strategic policy H2.2.b) requires development of former Green Belt sites, including Chase Park and Crews Hill, to provide a minimum 50% affordable housing (Plan, doc <a href="#">SUB2</a>).</p> <ul style="list-style-type: none"> <li>▪ The WPVA's final conclusions recommend that policies require 10% biodiversity net gain (para 12.109), whereas the Plan requires 20% (e.g. policy BG4).</li> </ul> <p>The above was to some extent covered in para 8.20.1 of the HWNPF Representation (<a href="#">rep.01311-1-1</a>).</p>

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5.20	<p>The assessment and selection of sites, per the Site Allocations Topic Paper (doc <a href="#">TOP2</a>), was opaque and flawed as it concerns site allocation RUR.02:</p> <ul style="list-style-type: none"> <li>▪ Said Topic Paper was only published <u>after</u> the 6 March 2024 meeting at which councillors were due to vote on the Plan’s submission.</li> <li>▪ Page 29 of the Paper summarises the six stages of site selection, which seem reasonable. However, only the final outcome appears to have been published, and it is unclear how sites were assessed or scored in the various stages.</li> <li>▪ Pages 32 and 33 summarise Stage 2, with a sequential approach to promote sustainable development. Sites were given a priority ranking, with urban, previously developed and accessible sites given higher priority. We note the absence of a Priority 9, for ‘greenfield in isolated <u>high</u> performing locations’, which suggests that such land was considered entirely unsuitable for development. Also, the sites’ rankings and supporting evidence were not published and it is unclear what impact, if any, the rankings had on the site allocations.</li> <li>▪ The Regulation 18 Consultation Statement states that “<i>the Green Belt and Metropolitan Open Land Study informed Stage 2 of the Site Selection Process</i>” (doc <a href="#">REG2</a>, page 31 of Appendix A). That Study scored RUR.02 ‘Strong’ on 4 of the 5 Green Belt purposes and stated: “<i>site is isolated</i>” (doc <a href="#">GRE3</a>, site ‘EN3’; and doc <a href="#">GRE1</a>, Table 8.1, site ‘LP465’).</li> <li>▪ The HWNPF’s representation (para 8.20) details incorrect statements in RUR.02’s brief ‘Justification for Allocation’ (Site Allocations Topic Paper, doc <a href="#">TOP2</a>, page 60) – for example, it states that the site has “<i>excellent access to public transport</i>”. That is nonsense, as it is a a PTAL 1b location and, for example, the Transport Topic Paper refers to TFL having flagged the “<i>very poor transport connectivity</i>”.</li> </ul> <p>Based on the above, RUR.02 should have been ranked Priority 9, and excluded as high performing isolated Green Belt land, just as similar sites were excluded (see Q5.23 below).</p> <p>The above was covered in paras 8.12.5, 8.19, 8.20 and 9.2.5 of the HWNPF Representation (<a href="#">rep.01311-1-1</a>). The impact on the residents of Hadley Wood is that RUR.02 was allocated when it should have been excluded early in the process. There are very limited amenities locally or within active travel distance, and it is not a sustainable development location. The allocation of RUR.02 should be deleted.</p>
5.23	<p>The reasons for selecting RUR.02 and not others were not clearly set out and justified.</p> <p>Our response to Q5.20 above details why we consider the selection of RUR.02 not justified.</p> <p>The Site Allocations Topic Paper suggests that the ‘Land North of Crews Hill Station’ (CHC15) and ‘Land north of Waggon Road’ (CFS208) were excluded as “<i>isolated inaccessible greenfield sites</i>” (doc <a href="#">TOP2</a>, pages 73 and 72 respectively). This conclusion appears justified and sets an appropriate benchmark for similar sites. However, the rationale is then ignored for the proposed release of other sites in Crews Hill and RUR.02, which is south of Waggon Road in Hadley Wood.</p> <p>The above was covered in para 9.2.5 of the HWNPF Representation (<a href="#">rep.01311-1-1</a>). Residents are impacted by RUR.02’s flawed allocation, which should be deleted. The high performing Green Belt land is important to the setting and character of Hadley Wood. It is not sustainable development, will add pressure on the limited local amenities and increase car use, congestion, pollution and flooding risk.</p>

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5.24	<p>In reviewing RUR.02, it became clear that constraints to development were evidently not taken into account.</p> <ul style="list-style-type: none"> <li>▪ TfL’s representation notes it <i>“has a PTAL 1 and it is unlikely that further public transport and/or active travel improvements could be provided at a level that would be necessary to support the proposed 160 homes”</i> (<a href="#">rep. 01891-3-1</a>, page 37).</li> <li>▪ The 2021 <a href="#">HELAA</a> stated that the site is <i>“located some distance from amenities”</i> (Evidence Base, <a href="#">Homes for All</a> section, site is referred to as ‘LP465’), and the IIA states that <i>“It is possible that new services and facilities and transport links such as bus routes or cycle paths will be provided as part of new developments, particularly at larger sites, but this was not assumed in assessing site options”</i> (doc <a href="#">SUB 8</a>, page F-24, para F.38).</li> <li>▪ The Environment Agency’s representation states that RUR.02 is in Flood Zone 2 and 3, and notes that <i>“Appendix C states this is FZ1 (page 511). This is incorrect”</i> (<a href="#">rep. 01926-2-1</a>, page 6).</li> <li>▪ The heritage considerations were clearly given limited or no weight, as RUR.02 is in an Archaeological Priority Area, lies between two Conservation Areas and one entrance is in the Conservation Area and the other immediately adjacent to Listed Buildings.</li> <li>▪ The landscape character was ignored. RUR.02 is in an Area of Special Character, as well as in the ‘Farmland Valleys and Ridges’, which the Council’s Characterisation Study describes as <i>“a major asset for the borough. It is of both landscape and historical significance [...]. The existing Green Belt boundary should be retained and protected, and future development and land use changes resisted”</i> (doc <a href="#">DES42</a>, pages 120-121). The Landscape &amp; Green Belt Appraisal, prepared by Enplan for the HWNPF, states that RUR.02 should be considered a ‘valued landscape’ for the purposes of NPPF para 180 (<a href="#">rep. 01311-4-1</a>, para 4.20).</li> </ul> <p>The above was covered in Executive Summary vi.e), paras 7.4.3, 8.24.3, 8.24.5, 8.24.8 and Appendices B and C of the HWNPF representation (<a href="#">rep.01311-1-1</a>). Residents are impacted by RUR.02’s flawed allocation, which should be deleted. The high performing Green Belt land is important to the setting and character of Hadley Wood. It is not sustainable development, will add pressure on the limited local amenities and increase car use, congestion, pollution and flooding risk.</p>

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