

06 January 2025

By email: [annette.feeney@enfield.gov.uk](mailto:annette.feeney@enfield.gov.uk)

Dear Inspector,

## Matter 2 (Issue 2.1) – Hadley Wood Housing Need and Supply (Q2.6 and Q2.7)

CBRE is instructed by Duchy of Lancaster (**Respondent ID: 01672**) in respect of their land interest at Camlet Way. The site has been assessed through the Council's evidence base and is allocated for 160 homes under Site Allocation RUR.02 (hereafter "SA RUR.02") in the draft Local Plan.

### Q2.6

**How does the 160 homes relate to the made Hadley Wood Neighbourhood Plan? Is this figure over and above any requirement set out in that Plan?**

The Hadley Wood Neighbourhood Plan (November 2023) (hereafter "HWNP") does not set specific housing targets for Hadley Wood. The Neighbourhood Plan quotes PPG guidance in this regard, which confirms "*the neighbourhood planning body does not have to make specific provision for housing, or seek to allocate sites... Housing requirement figures for neighbourhood areas are not binding, as neighbourhood planning groups are not required to plan for housing*". The 160 homes allocated within the draft Local Plan under SA RUR.02 is not specifically recognised in the HWNP, given the HWNP was adopted in November 2023 on the basis of the currently adopted Local Plan.

The HWNP states "*although this Neighbourhood Plan does not set specific housing targets or site allocations within Hadley Wood, it is recognised that some change is likely to happen in the future*" and subsequently "*takes a pragmatic view on development*". The 160 homes allocated under SA RUR.02 therefore presents an important opportunity for housing to be delivered in this location, whilst ensuring the development adheres to several area specific policy requirements.

Paragraph 30 of the NPPF (December 2023<sup>1</sup>) sets out that “once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently”. Therefore, once the draft Local Plan is adopted, this will take precedent where there are any conflicts with the Neighbourhood Plan. To remain “up-to-date” it would be necessary for the Hadley Wood Neighbourhood Plan to be reviewed to accord with the new Local Plan and its strategic direction (including where relevant any allocations).

## **Q2.7**

### **Does the figure of 160 homes reflect the overall strategy for the pattern and scale of development and any relevant allocations, as required by paragraph 67?**

Paragraph 67 of the NPPF (December 2023) is as follows:

*“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement”.*

In line with the above, the footnote to Draft Local Plan Policy SS1 (Spatial Strategy) confirms “the minimum requirement for the Hadley Wood Neighbourhood Plan area, in line with NPPF Paragraph 67, is 160 homes. Whilst a proportion of the borough’s overall windfall is also likely to be delivered in Hadley Wood, it has not been possible to quantify this”.

The allocation of 160 homes at Camlet Way under SA RUR.02 has determined the minimum housing requirement for the HWNP area. The allocation directly responds to the overall pattern and scale of development across the borough, presenting a unique opportunity to provide affordable and family housing to meet local needs, as set out below:

#### Contribution towards the provision of family housing

Enfield’s latest Annual Monitoring Report (2021/2022) states that 79% of the permitted net housing size mix in 2021/2022 for the borough was for studios, 1 beds or 2 beds. Further to this, it is demonstrated that in the same year, 68% of completions were 1 beds or 2 beds.

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<sup>1</sup> Reference to the NPPF (2023) is made as this is the basis upon which the Enfield Local Plan is to be assessed.

The Hadley Wood Neighbourhood Plan notes that the housing market in Hadley Wood is very different to the market across Enfield as a whole, with a mix of house sizes very heavily skewed towards larger homes (almost 70% of homes in Hadley Wood have four bedrooms or more in comparison with 19% across the Borough). A key objective of the Hadley Wood Neighbourhood Plan is therefore to provide smaller family homes.

In line with this, SA RUR.02 sets out that the Camlet Way site should ‘*comprise a large proportion of family homes*’. Therefore, development on the site represents an opportunity for the provision of the type and size of family housing that is needed by the local community and in contrast to the smaller 1 and 2 bed units that have been completed and permitted across other parts of the borough. The site will play an important role in the delivery of family housing and contribute to an overall balance and mix of housing across Enfield.

#### Contribution towards the provision of affordable housing

Enfield’s Housing Needs Assessment (2020) sets out that the median house price in Enfield has increased from £114,000 in 2000 to £319,000 in 2019, marking a rise of nearly 250%. The report continues to note that the median house in Enfield now costs more than 13 times the average annual earnings, leading to issues of limited housing choices and overcrowding. The delivery of affordable housing on the site will help in meeting some of this need.

Furthermore, as set out in Policy SS1 (Spatial Strategy), the majority of planned development within Enfield will come forwards to the east of the borough and within the London Plan Opportunity Areas in the Lee Valley (Meridian Water) and at New Southgate. The majority of development coming forwards in these areas will likely be taller, flatted development of a high density.

Located on the edge of the urban area of Hadley Wood, the site presents a unique opportunity to bring forwards a different type of development, one that consists lower density housing that is complimentary with the surrounding area.

The site will therefore play an important role in providing varying types of affordable family housing to meet the needs of the local community.

#### Well located in terms of transport and active travel opportunities

Paragraph 147 of the NPPF (December 2023) notes that “*When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.... Plans should give first consideration to land which has been previously developed and/or is well-served by public transport*”.

Paragraph 109 states “*Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*”.

The site is uniquely situated directly adjacent to Hadley Wood Station which provides direct links to Welwyn Garden City to the north and London (Moorgate) to the south. There are also a number of bus stops situated in close proximity, providing local bus services between Hadley Wood Station and The Spire Shopping Centre, Barnet. Furthermore, the site is also located in close proximity to a range of local amenities and facilities. This includes a row of local shops, which are designated as a Local Shopping Parade in the adopted Local Plan. The local primary school, Hadley Wood Primary School, is situated approximately 300m to the east of the site. As such, the site is located in a sustainable location and is well located in terms of transport and active travel opportunities and directly responds to the NPPF’s requirement for land well-served by public transport to be considered first.

#### Summary

Accordingly, the allocation at Camlet Way directly responds to the overall pattern and scale of development across the borough in line with paragraph 67 of the NPPF (December 2023), presenting a unique opportunity to provide affordable and smaller family housing, in contrast to the smaller, high density, flatted development that is permitted in other parts of the borough and within the Opportunity Areas. The Camlet

Way site is in a sustainable location well served by trains and buses, and well connected to surrounding local amenity.

The Duchy support the figure of 160 homes as a minimum housing requirement (underpinned by initial masterplanning and technical work) for the area, and request it is made clear within the Local Plan that this figure is based on Site Allocation SA RUR.02. Any additional allowance for growth / windfall development is to be determined by the LPA and would be in excess of the 160 units. It is requested the footnote to Draft Local Plan Policy SS1 (Spatial Strategy) is amended to ensure this is clear:

*“the minimum requirement for the Hadley Wood Neighbourhood Plan area, in line with NPPF Paragraph 67, is 160 homes **in line with SA RUR.02**. Whilst a proportion of the borough’s overall windfall is also likely to be delivered in Hadley Wood, it has not been possible to quantify this **and would be in excess of this requirement**”.*

Yours Sincerely,

**Adam Kindred MRTPI | Senior Director**

CBRE Ltd | UK Development – Planning