

**Hadley Wood Neighbourhood Planning Forum
Matter 4 – Green Belt**

Question	Comments
4.2	<p>No, the Council has not fully assessed all available alternative opportunities.</p> <ul style="list-style-type: none"> ▪ CPRE’s 2019 State of the Brownfield report (para 3.7) noted that it had identified brownfield sites in Enfield that could accommodate 37,000 homes. ▪ The Council’s capacity study, which was not submitted with the Plan, has not been updated since 2020 (New Enfield Plan 2041: Capacity Study, Evidence Base, Homes for All section). ▪ The Green Belt Exceptional Circumstances Topic Paper indicates that the Council has relied on Calls for Sites (doc TOP5, para 4.10), and the dismissive and nonsensical response to the list of 11 brownfield sites with good public transport accessibility that was in the HWNPF’s representation reflects that the Council has not seriously explored all previously developed and Council-owned land (Consultation Statement, doc SUB12.1, page 454). ▪ The Council started exploring Meridian Water in 2009, and in 2019 secured £170mm of funding from the Housing Infrastructure Fund. The Plan repeatedly mentions that ‘10,000’ new homes will be built, but only 6,711 are included in the Plan to 2041 (doc SUB2, paras 3.68 & 3.75). ▪ Although the London Plan set Enfield a minimum target of 353dpa for small sites (policy H2, Table 4.2), and the first three years of the Plan period (2019-2022) recorded oversupply of 379dpa (Housing Topic Paper, doc TOP3, Table 11), the Council has only included 281dpa. <p>The Council appears to have deliberately chosen Green Belt over brownfield and alternative sources of supply.</p> <p>The above was covered in paras 8.9 and 8.27 of the HWNPF Representation (rep.01311-1-1). 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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4.4	<p>Although the framework appeared reasonable, the Council’s approach to altering the Green Belt boundaries was in practice not compliant with statutory requirements. A combination of inertia and slow progress on Meridian Water appears to have persuaded it to offer Green Belt land as a quick fix.</p> <ul style="list-style-type: none"> ▪ CPRE’s 2019 State of the Brownfield report (para 3.7) noted that it had identified brownfield sites in Enfield that could accommodate 37,000 homes. ▪ However, per Q4.2 above, the Enfield Capacity Study was not updated since 2020 and the Council has relied on Calls for Sites instead of proactively identifying and bringing forward land for development, as required per NPPF para 125. ▪ The Green Belt allocations in Hadley Wood and Chase Park were not mentioned in the ‘Issues and Options’ consultation (2018), but were unexpectedly introduced in the subsequent “Preferred Approaches” Regulation 18 consultation (2021, doc REG1). The sites were included as they were put forward by their owners, and the allocations do not reflect a strategic vision for sustainable development. The supporting ‘evidence’, in the form of the Topic Papers, was only produced 3 years later, with many documents only prepared and/or published <u>after</u> the Council Meeting scheduled for 6 March 2024, where submission of the Plan was to be approved. The evidence was clearly written to fit the decisions made earlier, not to inform them. ▪ Having written a Plan around sites put forward by owners, it is unsurprising that: <ul style="list-style-type: none"> ○ the exceptional circumstances are not evidenced. The housing need is simply the sum of sites put forward for development, including those in the Green Belt. That ‘need’ is then considered to represent the exceptional circumstances that warrant release. ○ A review of RUR.02 indicates that the NPPF requirement to ensure sustainable development was circumvented with the use of incorrect information and ignoring unsupportive documents: <ul style="list-style-type: none"> ⇒ The Site Selection Process did not have a lowest Priority 9 for high performing isolated Green Belt land (which is what RUR.02 is). ⇒ Sites’ priority ranking was not evidenced and published, hampering effective challenge. ⇒ The Green Belt and MOL Study, that was said to have informed the Process, scored RUR.02 ‘Strong’ on 4 of the 5 Green Belt purposes and stated: “<i>site is isolated</i>”. The Council simply ignored this. ⇒ The 2021 HELAA stated that the site is “<i>located some distance from amenities</i>” (Evidence Base, Homes for All section, document, site ‘COC8’ and ‘LP465’). The 2023 submitted version has removed the ‘Access to Local Services’ information (HELAA potential sites Part 3, doc HOU4, site ‘COC8’). ⇒ The Site Allocation Topic Paper is equally silent on the lack of amenities near RUR.02 and makes the false statement that the site has “<i>excellent access to public transport</i>”. It is a PTAL 1b location and, for example, the Transport Topic Paper refers to TFL having flagged the “<i>very poor transport connectivity</i>”. ⇒ Infrastructure requirements were ignored. The IIA states in respect of RUR.02 that “<i>new services and facilities and transport links [...] will be provided as part of new developments, particularly at larger sites, but this was not</i>
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	<p><i>assumed in assessing site options</i>". The Infrastructure Development Plan does not mention Hadley Wood.</p> <ul style="list-style-type: none"> ⇒ The Baseline Transport Review indicates that key roads by Hadley Wood already operate at over 100% of capacity at peak times (Figures 3-11 and 3-12 of doc TRA8). The addition of thousands of homes at RUR.02 and Chase Park will result in gridlock. The Council simply ignored this and no improvements are planned. ⇒ National Highways stated that further modelling is needed to review possible queues and delays at M25 Junctions 24 and 25 (rep. 01753-1-1, pg 10). ⇒ Transport for London stated that site RUR.02 is a PTAL 1 location and it is unlikely that public transport or active travel could support the 160 homes, and that it is car-dependent and inconsistent with LP Good Growth GG2 (rep. 01891-3-1, pg 37). ⇒ The IIA scored RUR.02 only positive on 5 of the 39 parameters, but the Regulation 22 Consultation Statement explains that the Council simply considered additional housing to outweigh all negative IIA scores. ⇒ The Environment Agency has noted that site RUR.02 is in Flood Zones 2 & 3, whereas the Site Allocation paper incorrectly states FZ1 (rep. 01926-2-1, pg 6). <p>The above was covered in section 8 of the HWNPF's representation (rep.01311-1-1).</p> <p>The impact on the residents of Hadley Wood of the proposed wholesale release of land from the Green Belt for development of thousands of homes will be dramatic. The development of RUR.02 will have the most direct and far-reaching impact, ranging from additional pressure on the already oversubscribed primary school (with the headteacher indicating that it will not be allowed to expand) to congestion, pollution and increased flooding risk. Our response to Q1.5 refers to concerns expressed by bodies such as TfL and National Highways. The allocation of RUR.02 should be deleted, as should most of the allocations of Crews Hill and Chase Park.</p>
4.5	<p>There is no evidence that previously developed land and locations well served by public transport were given priority in the proposed releases from the Green Belt.</p> <ul style="list-style-type: none"> ▪ Although the Site Assessment Process suggested higher priority ratings would apply to previously developed land and accessible locations, the sites' ratings and supporting assessments were not published. It is also unclear how the ratings impacted the site allocations, if at all (Site Allocation Topic Paper, doc TOP2, page 29). ▪ There is no lowest Priority 9, for 'greenfield in isolated <u>high</u> performing locations'. The Green Belt and MOL Study, which informed Stage 2, scored RUR.02 'Strong' on 4 of the 5 Green Belt purposes and states: "<i>site is isolated</i>" (doc GRE3, site 'EN3'; and doc GRE1, Table 8.1, site 'LP465'). ▪ The IIA states in respect of RUR.02 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 SUB 8, page F-24, para F.38).

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	<ul style="list-style-type: none"> ▪ The recently published Transport Topic Paper states that TfL “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” (doc E3.5, Table 5-2). ▪ The Council’s Baseline Transport Review shows key roads by Hadley Wood already operating at over 100% of capacity at peak times (Figures 3-11 and 3-12 of doc TRA8), yet neither the ‘Emerging Infrastructure Delivery Plan’ nor the ‘Infrastructure Development Plan – Transport’ contain any projects or improvements in or around Hadley Wood (docs IDP1 and IDP2). <p>The above was covered in paras 8.12.5, 9.2.5, 9.2.6, 9.2.7 and 9.2.8 of the HWNPF Representation (rep.01311-1-1). 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 location, will add pressure on the limited local amenities and increase car use, congestion, pollution and flooding risk. The problems will be exacerbated by the equally car-dependent developments at Chase Park and Crews Hill, most of which should also be deleted.</p>
4.6	<p>The need to release land from the Green Belt to ensure the provision of at least 33,280 homes has not been evidenced.</p> <ul style="list-style-type: none"> ▪ Although the London Plan set Enfield a minimum target of 353dpa for small sites (policy H2, Table 4.2) and the first three years of the Plan period (2019-2022) recorded oversupply of 379dpa (Housing Topic Paper, doc TOP3, Table 11), the Council has only included 281dpa. Windfall developments therefore look deliberately understated. ▪ CPRE’s 2019 State of the Brownfield report (para 3.7) noted that it had identified brownfield sites in Enfield that could accommodate 37,000 homes. There should be no need to release Green Belt land. ▪ The Council’s capacity study has not been updated since 2020 (New Enfield Plan 2041: Capacity Study, Evidence Base, Homes for All section), and there is no evidence that the Council has proactively pursued all alternative sources of supply, as required under NPPF para 125. ▪ Although the Council started exploring Meridian Water in 2009, and it secured £170mm of government funding in 2019, only 6,711 of the 10,000 planned homes are included in the Plan period to 2041. ▪ The Council has failed to respond to the list of 11 brownfield sites in the HWNP Forum’s representation that could produce 3,500 homes (Consultation Statement, doc SUB12.1, page 454). ▪ The Green Belt Exceptional Circumstances Topic Paper indicates that the Council has relied on Calls for Sites (doc TOP5, para 4.10) and the dismissive and nonsensical response to the list of 11 brownfield sites with good public transport accessibility that was included in the HWNPF’s representation reflects that the Council has not seriously

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	<p>explored all previously developed and Council-owned land (Consultation Statement, doc SUB12.1, page 454).</p> <ul style="list-style-type: none"> ▪ The Housing Topic Paper explains that: “<i>the housing requirement figure after 2029 is merely a sum of the allocations, insofar as they are judged to produce dwellings in the Plan period</i>” (doc TOP3, para 2.34), and the Plan states that housing need in itself provides the exceptional circumstances for Green Belt release (Plan, doc SUB1, para 2.28). Therefore, the release of land from the Green Belt was in fact simply based on sites such as RUR.02 having been put forward by their owners. <p>The Council is releasing Green Belt land as a quick fix to its inability to encourage enough housing on brownfield, and to progress the Meridian Water project.</p> <p>The above was covered in paras 8.2 and 8.9 of the HWNPF Representation (rep.01311-1-1). 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. The problems will be exacerbated by the developments at Chase Park Crews Hill, which are equally car-dependent locations, and most of which should also be deleted.</p>
4.8	<p>No evidence that there are exceptional circumstances in principle to justify altering the Green Belt boundaries has been provided at both the strategic or site-specific level.</p> <ul style="list-style-type: none"> ▪ The Plan includes 6,256 homes on land to be released from the Green Belt, with a further 3,000+ to follow after 2041. However, per Q2.6 above, alternative available sources of supply have not been proactively explored. ▪ The Housing Topic Paper explains that: “<i>the housing requirement figure after 2029 is merely a sum of the allocations, insofar as they are judged to produce dwellings in the Plan period</i>” (doc TOP3, para 2.34), and the Plan states that housing need in itself provides the exceptional circumstances for Green Belt release (Plan, doc SUB1, para 2.28). Therefore, any Green Belt site put forward and allocated is included in the target, which in turn provides the strategic level exceptional circumstance that justify its release from the Green Belt. The circular argument is illogical and fundamentally wrong. ▪ The Site Allocation Topic Paper purports to evidence the local level exceptional circumstances. However, the HWNPF’s representation (para 8.20) details that many of the comments on RUR.02 are wrong – for example, the Topic Paper states that the site has “<i>excellent access to public transport</i>”, whereas it is a PTAL 1b location, the Transport Topic Paper refers to TFL having flagged the “<i>very poor transport connectivity</i>” and there are no transport improvements planned for Hadley Wood. ▪ The Council has also used a deeply flawed approach to the assessment of Green Belt sites’ sustainability. The IIA scored RUR.02 only positive on 5 of the 39 parameters but, contrary to NPPF para 16, the Council argue that the provision of additional housing outweighs all negative scores. (IIA, doc SUB 8, pg 155, ‘R.02’ and Reg 22 Consultation Statement, doc SUB12.1, page 155, ‘Troy Planning’).

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	<p>The above was covered in paras 8.8., 8.9, 8.10, 8.11, 8.12, 8.20 and 9.1.4 of the HWNPF Representation (rep.01311-1-1). The Council is offering developers high performing Green Belt land, instead of prioritising all brownfield sites, with the result that 9,000+ homes will be built on unsustainable, car-dependent locations without appropriate amenities within active travel distance. The impact on the residents of Hadley Wood is that it will add to pressure on the limited local amenities and exacerbate congestion, pollution and flooding risk. The allocation of RUR.02, as well as most of Crews Hill and Chase Park, should be deleted.</p>

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