

## IN2: Matters, Issues and Questions – Written Statement

### Matter 1: Legal, procedural and other general matters

#### Issue 1.1: Duty to Co-operate

**Q1.2:** What outcomes have resulted from engagement and cooperation on relevant strategic matters and how have these informed the Plan's policies?

- I can find no evidence of any significant outcomes or changes to the ELP as a result.
- With respect to site RUR.02, this site remains in the Enfield Plan. The inputs from neighbouring authorities and the detailed submissions from the Hadley Wood Neighbourhood Planning Forum (HWNPF) have been ignored.

**Q1.3:** Is the process of cooperation demonstrated with clear evidence, including SoCG as expected by NPPF paragraph 27 and the Planning Practice Guidance (PPG)?

Planning Practice Guidance has not been followed.

*Paragraph: 006 Reference ID: 61-006-20190723, states:*

***Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. Local plan policies should not duplicate those in the neighbourhood plan, and do not need to supersede them unless changed circumstances justify this. It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals, and similarly for neighbourhood plans to acknowledge local plan policies that they relate to.***

*Revision date: 23 07 2019*

HWNP Aspiration HW (iii) is very clear. It *'proposes that Green Belt boundaries within and surrounding Hadley Wood remain unchanged'*.

The aspiration was supported by detailed, independent, professional evidence, that demonstrated the beauty and value of the site, the isolation of the area, and the lack of local infrastructure and services.

- The wording of the aspiration was agreed with Enfield Council Officers and accepted in the report of the Independent Examiner.
- The HWNP was supported by over 95% of votes at the referendum.
- The HWNP was formally adopted by Enfield Council on 22 November 2023, with unanimous, all-party support.

However, there are no references to this proposal whatsoever within thousands of pages of plan documents. The HWNP was adopted less than 6 months prior to publication of the Regulation 19 version of the New Enfield Plan but ignored without comment, critique or justification.

The local planning authority have clearly failed to take the HWNP policies and aspirations into account in the local plan. This is a significant breach of Planning Practice Guidance.

The shortcomings have led to the unsound allocation of RUR.02, and the site should be deleted from the proposals in the New Local Plan.

## **Issue 1.2: General Conformity with the London Plan**

**Q1.7:** In overall terms, is the Plan in general conformity with the London Plan?

In addition to comments on behalf of the Mayor of London that highlight issues with the release of the Green Belt and Tall Buildings, I flag contradictions with respect to Sustainable Locations. The proposed release of Green Belt land in rural, isolated and car-dependent areas of the borough without substantive improvements to the road network, public transport, sustainable transport, local services and local infrastructure, does not meet policy T1 of the London Plan.

*Sustainable locations (Policy T1)*

*A Development Plans should support, and development proposals should facilitate:*

- 1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041 (75% for outer London).*

*B All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.*

A sample of Hadley Wood residents' current travel patterns highlights that less than 10% of current journeys are made by foot, cycle or public transport, a substantial shortfall from the London Plan target. Site RUR.02 (and other Green Belt releases) are proposed in unsustainable locations.

The shortcomings have led to the unsound allocation of RUR.02 and other Green Belt land, and that the sites should be deleted from the proposals.

## **Issue 1.3: Public Engagement**

**Q1.14: Have representations been adequately taken into account?**

Both my personal representation and the submission from the Hadley Wood Neighbourhood Planning Forum highlighted in detail that the evidence does not justify exceptional circumstances for the release of site RUR.02 from the Green Belt.

The consultation response (SUB12.1) to representation 01669 (page 457) fails to critique or comment on the detailed submissions. It simply cross-references a number of documents and asserts that these '*support the inclusion of site RUR.02 in the Local Plan*'.

However, these quoted documents have very few references to site RUR.02, no consolidated analysis of the site, and no robust evidence for its release.

- The consultation response does not address the evidence in the representations.

- The Local Plan Evidence Base fails to support the release of this site but continues to be ignored.
- The representations have not been taken into account.

The shortcomings have led to the unsound allocation of RUR.02 and the site should be deleted from the proposals.

### **Q1.14 Continued**

**The Consultation Response to 01669 demonstrates a total failure to take the representation into account.**

#### **Council response**

*Comments noted. The justification for releasing RUR.02 is based on a thorough and evidence-based approach detailed in several documents: 1) **ELP Spatial Strategy and Overall Approach Topic Paper**: This document outlines the comprehensive strategy behind the Local Plan and the exceptional circumstances necessitating Green Belt release. It demonstrates the strategic importance of site RUR.02 in meeting Enfield's housing and development needs. 2) **Exceptional Circumstances Topic Paper**: This paper provides a robust justification for the exceptional circumstances required for Green Belt release. It includes an analysis of the need for housing and the lack of viable alternatives within existing urban areas. 3) **Site Allocation Topic Paper**: This paper includes site-specific assessments, detailing the suitability and planning considerations for each proposed site, including RUR.02. It considers factors such as public transport accessibility, local services, flood risk, and the ecological and historical significance of the site. The Council has followed a detailed and transparent process, incorporating feedback and ensuring all criteria and evidence support the inclusion of RUR.02 in the Local Plan.*

#### **Weaknesses of the Consultation Response**

1. This Consultation Statement fails to respond to the detailed evidence highlighted in the representations, including that in the Council's own evidence base. It provides no justification to disregard or discount evidence of landscape value, high performing green belt, flood risk, poor public transport, limited local services, no strategic investment, isolation, car dependency, and the unsustainability of significant new development in this location.
2. The highlighted documents:
  - a. Have very few references to site RUR.02.
  - b. Those few references are subject to errors and unsubstantiated claims.
  - c. They do not address the specific evidence highlighted in the representations.
  - d. They fail to provide any evidence to justify exceptional circumstances for the release of this specific site.
3. There is no "thorough and evidence-based approach" to site RUR.02. In total the highlighted documents have less than a single page referring to this specific site.

**Representations have NOT been adequately taken into account.**

These shortcomings have led to the unsound allocation of RUR.02 and the site should be deleted from the proposals.

### Q1.14 Continued

**Specific references to site RUR.02** in the documents quoted in the Consultation Response are highlighted and critiqued in the following sections.

1. The **Spatial Strategy and Overall Approach Topic Paper** (TOP1) only has a single reference to this site.

*7.22 The sites proposed for removal from the Green Belt to meet development needs are ... Land between Camlet Way and Crescent West, Hadley Wood*

The Spatial Strategy and Overall Approach Topic Paper includes no evidence to justify exceptional circumstances for the release of this specific site.

2. The **Exceptional Circumstances Topic Paper** (TOP5) includes only the following statements with respect to RUR.02.

*4.31 The four proposed Green Belt sites for housing (or housing with other land uses, including supporting infrastructure) are: RUR.02*

No supporting infrastructure is identified or committed in Hadley Wood in the New Enfield Plan. TfL have explicitly ruled out any improvements to public transport, and there are no improvements to primary education or healthcare.

The statement in the Exceptional Circumstances Topic Paper is incorrect.

*4.41 The two other Green Belt housing sites, SA RUR.01 (Land Opposite Enfield Crematorium) and SA RUR.02 (Land between Camlet Way and Crescent West, Hadley) are **sustainably located**, will make further contributions to the provision of family and affordable housing and are well located in terms of transport and active travel opportunities.*

The site is not sustainably located and does not come close to complying with Sustainable Locations Policy T1 in the London Plan.

- This is confirmed by independent professional inputs including from Transport for London, the Mayor of London, and the Enfield Characterisation Study (DES42).
- It has the poorest levels of public transport accessibility (PTAL 1) in Greater London.
- No improvements to public transport or local services are identified.
- It is an isolated and car dependent locality.

*4.50 and the land to the west Hadley Wood are deemed to make a strong contribution to Green Belt purpose 1.*

4.50 and the land west of Hadley Wood were found to make a strong contribution to Green Belt purpose 4.

Whilst these statements are correct, they are incomplete.

The site performs strongly against 4 of the 5 purposes of the Green Belt, and the **harm of release is very high.**

The conclusions of the Green Belt and MOL Study are omitted from the Exceptional Purposes Topic Paper.

Additionally, there are no references to the beauty, qualities and other values of the site, including its contribution to landscape character, the setting of 2 conservation areas, to biodiversity, as an area of Archaeological Importance, or to flood risk mitigation. There is no consideration whether development on this specific site would meet the NPPF goal of ‘sustainable development’.

The Exceptional Circumstances Topic Paper fails to consider or comment on any of the evidence highlighted in my own and many other representations: it fails to justify the release of this specific site from the green belt.

3. The **Site Allocations Topic Paper** (TOP2) includes a brief entry on site RUR.02 (page 60).

*Although the site sits within the Green Belt, it is at the edge of the urban area, and **has excellent access to public transport – being directly adjacent to Hadley Wood station.** There are also **a number of local amenities/facilities located around the station.** Green Belt land will be required to help ensure the Council can meet its housing targets. The viability of many of the urban sites is marginal, and evidence suggests they will not help meet needs – particularly in respect of family and affordable housing. Therefore, Green Belt release is also required to help meet the target. Findings from technical evidence indicate there may be viability constraints which impede development on sites within the urban area, thus indicating that Green Belt release is likely to be required. 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.** The site has the potential to deliver larger family sized homes through mansion blocks houses, housing. The site has the potential to deliver improvements to north-south pedestrian and cycle connections with access points from Camlet Way and Crescent West, a to create a new pedestrian bridge over the Monken Mead Brook, and an improved connection to the station, whilst retaining the area North of the Monken Mead Brook as open space, as well as new publicly accessible open space. These benefits balanced with the strategic level exceptional circumstances set out above mean that the local level exceptional circumstances have been met for the site.*

The Site Allocations Topic Paper makes a series of statements that are not supported by evidence, points highlighted to Officer’s in numerous representations.

- Proximity to the train station is no evidence of good public transport or of the sustainability of the location.
  - With limited train frequency, poor reliability and no peak time inter-connecting bus services, public transport access levels are the lowest in London. This is an isolated and car dependent location.
  - The amenities near the station and in the wider locality are very limited and meet only a small minority of day-to-day needs. The vast majority of journeys are by private car.
  - There is no provision of secondary education, NHS healthcare, or significant employment in the local parade or wider area. A café and convenience store provide limited entertainment and retail services.
  
- The local improvements identified are negligible (a footpath and footbridge), and include no new investments in public transport, education, employment or healthcare.

The Site Allocations Topic Paper fails to cross reference the Green Belt Study which highlights the harm of release is very high.

The Site Allocations Topic Paper also fails to reference the Integrated Impact Assessment (LUC June 2021).

This scores site RUR.02 (previously SA45) predominantly red and amber. It provides no evidence to justify the release of this specific site from the green belt.

The Site Allocations Topic Paper fails to justify that development of this specific site would achieve sustainable development, as required by section 2 of the NPPF.

The Site Allocations Topic Paper fails to evidence exceptional circumstances for the release of this specific site from the Green Belt.

### **Summary**

None of the documents cross referenced in the Consultation Response address the representation or the detailed evidence.

### **REPRESENTATIONS HAVE NOT BEEN TAKEN INTO ACCOUNT AT ALL, LET ALONE ADEQUATELY.**

These shortcomings have led to the unsound allocation of RUR.02 and the site should be deleted from the proposals.

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## **Issue 1.4: Sustainability Appraisal**

### **Q1.16 (d): Is the IIA decision making and scoring robust, justified and transparent?**

The IIA scores site RUR.02 predominantly amber and red. It provides no justification for the releases of this site.

The basis of the IIA scores (green, amber and red) are not evidenced. The scores are not justified and transparent.

Several scores understate the harm of release. These have been flagged but not amended.

The IIA does not incorporate several items of key evidence, including:

- The contribution to Green Belt purposes.
- The harm of Green Belt release.
- The beauty and value of the landscape.
- Existing designations.
- Public transport accessibility scores (PTAL).
- Peak time public transport access times to key services (health, education, main town centres and employment).

The IIA does not weight individual criteria based upon their relative impact, importance and harm.

The IIA provides no overall 'score' for the site.

The IIA has no overall comparison of the ranking of all sites.

In summary, the IIA does not provide a consolidated, robust, justified and transparent basis for site selection.

These shortcomings have led to the unsound allocation of RUR.02 and other sites, and these sites should be deleted from the proposals.

### **Q1.16 (e): Has the Council provided clear reasons for not selecting reasonable alternatives?**

The Council has failed to ensure the full delivery of all 10,000 homes planned for the brownfield site at Meridian Water (delivering only 6,711 in the plan period).

The Council has failed to robustly and proactively consider 11 brownfield sites highlighted by the HWNPF, that could deliver around 3,500 new homes.

The Council has failed to robustly analyse the alternative brownfield opportunities identified in the 'Space to Build' report submitted by the Enfield Study and CPRE.

The Council has underestimated development from windfall sites, potentially by thousands, which would further reduce housing supply pressure.

The Council has failed to consider reasonable alternatives.

These shortcomings have led to the unsound allocation of RUR.02 and other sites, and these sites should be deleted from the proposals.

**Q1.16 (f): Is it clear how the IIA has influenced the Plan strategy?**

There is no consolidated site allocation analysis that incorporates the IIA scores.  
There is no robust justification to allocate sites where the IIA harm of release is high.  
The results of the IIA have been ignored.

These shortcomings have led to the unsound allocation of RUR.02 and other sites, and these sites should be deleted from the proposals.

**Q1.16 (g): Have concerns been raised about the IIA, and what is the Council's response?**

All these concerns were raised in each consultation, without amendment or response.

These shortcomings have led to the unsound allocation of RUR.02 and other sites, and these sites should be deleted from the proposals.

2,731 words.