

**Hadley Wood Neighbourhood Planning Forum
Matter 2 – housing need & supply**

Question	Comments
2.1b)	<p>We acknowledge the Inspector’s comment that the upcoming hearings will deal with housing need and requirement, not supply, however, the two are intertwined, as the Housing Topic Paper summarises the approach as follows: “<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).</p>
2.1d)	<p>The housing requirement is not positively prepared and not in general conformity with the London Plan, as it relates to Green Belt allocations.</p> <ul style="list-style-type: none"> <p>▪ The Housing Topic Paper (doc TOP3) states that the post-2029 housing figure/need was:</p> <ul style="list-style-type: none"> <p>○ <u>the sum of site allocations (para 2.34).</u></p> <p>The capacity-based methodology used to calculate the post-2029 target is especially flawed for Green Belt land. Sites put forward are added to the housing target, which is then labelled the ‘housing need’ that in turn justifies release of the land from the Green Belt and evidences the exceptional circumstances, with the additional housing provision outweighing all negatives in the IIA assessments. The circular argument is illogical and allows the Council to allocate any Green Belt site put forward, including in unsustainable development locations.</p> <p>○ <u>derived from London Plan para 4.1.11 (para 2.26).</u></p> <p>Para 4.1.11 requires that additional capacity must be assessed in consultation with the GLA and takes into account committed transport infrastructure improvements. Those conditions were not complied with, as the GLA has steadfastly opposed Enfield’s Green Belt allocations and the Housing Topic Paper explicitly states that there are no infrastructure schemes that could provide additional capacity (doc TOP3, para 2.52).</p> <p>▪ The subsequent Conformity Topic Paper (doc E3.2, para 26) states that:</p> <ul style="list-style-type: none"> <p>○ <u>London Plan para 4.1.11 no longer represents the GLA’s position.</u></p> <p>In the absence of accompanying documentation that legally supersedes the adopted London Plan, the formally approved version remains in force.</p> <p>○ <u>as a minimum, the housing targets in Table 4.1 should be rolled forward.</u></p> <p>Rolling over Enfield’s allocation per Table 4.1 would materially reduce the post-2029 housing requirement, from 1,735 to 1,246 dwellings p.a. That would add weight to the arguments to delete the Green Belt allocations from the Plan.</p> <p>○ <u>any lack of conformity with para 4.1.11 could not result in the ELP being out of general conformity.</u></p> <p>The requirement to conform relates to the London Plan as it is in force. Para 4.1.11 has not been validly and legally superseded, and boroughs must conform with the approved version.</p> <p>▪ The allocations are thus not aligned with the London Plan Policy T1’s strategic target that 80% of journeys are to be made on foot, by bike or using public transport by 2041. The Green Belt allocations are relatively isolated, in areas with poor public</p>

**Hadley Wood Neighbourhood Planning Forum
Matter 2 – housing need & supply**

Question	Comments
	<p>transport accessibility. The Transport Topic Paper states that TfL believe that sites including Chase Park, Crews Hill and RUR.02 are “<i>likely to result in car dependent development contrary to the Good Growth objectives of the London Plan and the NPPF</i>” (doc E3.5, Table 5-2).</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), the Council has only included 281p.a. The number appears deliberately understated, as the first three years of the Plan period (2019-2022) recorded oversupply, of 379dpa (Housing Topic Paper, doc TOP3, Table 11). ▪ The HWNPF’s representation also notes that Enfield’s policy H4 has no location restrictions and therefore applies intensification around stations to <u>all</u> sites, whereas London Plan policy H1.B.2 limits that to ‘<i>suitable and available brownfield sites</i>’ (rep.01311-1-1, para 10.4). ▪ The Plan is thus not in compliance with NPPF para 16 and the London Plan’s objective GG2 and policies H1, H2, G1, G2 and T1. <p>The above was covered in section 7 and para 8.2 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>
2.3	<p>We are not aware of the GLA guidance being referred to, but even if it exists, it cannot disapply the general conformity requirement, as per the Planning and Compulsory Purchase Act 2004. London boroughs still need to align with the broader London Plan spatial development strategy, including objective GG2 and policies G1 and G2, that protect open spaces such as the Green Belt.</p>
2.5	<p>No comment on whether the target for the Hadley Wood Neighbourhood Plan Area should be changed from a footnote to be effective. However, per the comments on Q2.7 below, the target wording is problematic, as it excludes windfall developments. Without those, the 160 new homes would be unachievable if RUR.02 is not developed.</p> <p>The footnote’s comment, that windfall developments are excluded as “<i>it has not been possible to quantify</i>” their contribution, is contradicted by the Council’s ability to quantify windfall at 2,839 for the borough (Housing Topic Paper, doc TOP3, Table 14). Please also refer to Q2.7 below.</p> <p>The impact on residents in the Neighbourhood Plan area would be that Planning Officers will be minded to approve unsuitable developments to meet the flawed target. The footnote should include windfall developments.</p>

**Hadley Wood Neighbourhood Planning Forum
Matter 2 – housing need & supply**

Question	Comments												
2.6	<p>The Hadley Wood Neighbourhood Plan stated that it was not setting a housing target or site allocations (para 6.2 of rep. 01311-8-1).</p> <p>Excluding RUR.02, designated Open Space and the Conservation Area, the Hadley Wood Neighbourhood Plan area only measures 1.4sqkm, with no brownfield sites. Additional housing will therefore continue to come from family homes being replaced with apartment buildings, and garden developments. Per Q2.7 below, these types of developments have already materially increased the number of homes in the neighbourhood plan area, without appropriate investment in infrastructure. Further growth must therefore be managed prudently.</p>												
2.7	<p>The 160 new homes target for the Hadley Wood Neighbourhood Plan area, as written, will not reflect the overall pattern and scale of development.</p> <p>The footnote in Policy SS1 indicates that the 160 target <u>excludes</u> windfall developments; by implication it therefore relies entirely on site RUR.02 being developed. That is problematic because:</p> <ul style="list-style-type: none"> ▪ The examination will hopefully conclude that RUR.02 should remain in the Green Belt. ▪ Even if it is released from the Green Belt, there is no guarantee that the site will be developed during the Plan period. ▪ The HELAA Appendix E part 3 (doc HOU4) lists RUR.02 (then ‘COC8’) twice, with an estimated capacity of 160 on slide 13, but only 120 on slide 399. ▪ Conversely, development of RUR.02 might deliver materially more units than originally indicated – using the density proposed for Chase Park the number could be 500. ▪ Windfall schemes will develop at least 160 homes over the Plan period and, together with RUR.02, the aggregate expansion would not represent sustainable development. <p>As outlined in the HWNPF’s representation, excluding RUR.02, designated Open Space and the Conservation Area, the Hadley Wood Neighbourhood Plan area only measures 1.4sqkm. Nevertheless, windfall schemes have produced material growth:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Period</th> <th colspan="2" style="text-align: left;"># additional homes</th> </tr> </thead> <tbody> <tr> <td>2000 – 2018</td> <td style="text-align: center;">300</td> <td style="text-align: left;">built, taking the total from ~850 to ~1,150 (+35%)</td> </tr> <tr> <td>2019 – Apr 2024</td> <td style="text-align: center;">82</td> <td style="text-align: left;">built or approved</td> </tr> <tr> <td>Apr – Nov 2024</td> <td style="text-align: center;">26</td> <td style="text-align: left;">applied for</td> </tr> </tbody> </table> <p>In the absence of brownfield sites, growth has come from family homes being replaced with apartment buildings and, to a lesser extent, garden developments. On one road over half the homes have been replaced with apartment buildings and, to protect the character and setting of Hadley Wood, the Neighbourhood Plan wants to see enough family homes and gardens being retained. Housing growth may therefore slow but, with 108 units, i.e. two-thirds of the 160 stated target, already built, approved or applied for in the first 5 years of the Plan period, windfall schemes will produce at least the 160 required homes over the 20 year Plan period, without release of Green Belt land.</p> <p>The continuing windfall developments are putting great strain on local infrastructure. As detailed above, the 160 target will easily be met by windfalls, which will result in growth of</p>	Period	# additional homes		2000 – 2018	300	built, taking the total from ~850 to ~1,150 (+35%)	2019 – Apr 2024	82	built or approved	Apr – Nov 2024	26	applied for
Period	# additional homes												
2000 – 2018	300	built, taking the total from ~850 to ~1,150 (+35%)											
2019 – Apr 2024	82	built or approved											
Apr – Nov 2024	26	applied for											

**Hadley Wood Neighbourhood Planning Forum
Matter 2 – housing need & supply**

Question	Comments
	<p>over 50%, from ~850 homes in 2000 to over 1,300 in 2041. The Council’s insistence on a target of an additional 160 homes from site allocations, without any planned improvements in infrastructure, facilities and services, cannot be accommodated sustainably.</p> <p>The above issues were touched on in para 9.1.2 and 9.8.1 of the HWNPF Representation (rep.01311-1-1). The NP Area’s housing target should include windfall developments and the allocation of RUR.02 should be deleted.</p>
2.16	<p>The Plan does not make adequate provision for the needs of older people. The Hadley Wood Neighbourhood Plan highlighted the local need for housing for older people (rep. 01311-8-1, policy HW-10), whereas the allocation of RUR.02 is based 50% affordable housing and a borough-wide need for larger family housing that the Council claim cannot be developed in the urban areas (even though other boroughs are able to).</p> <p>The above was covered in para 8.20.1 of the HWNPF Representation (rep.01311-1-1). The impact of the Plan, and especially development of RUR.02, on Hadley Wood residents is that it does not address the identified local need. The allocation of RUR.02 should be deleted.</p>

Word count: 1,524