
To London Borough of Enfield:

I am responding to the proposals in the Draft Local Plan (DLP) published by the London Borough of Enfield (LBE) for community consultation. I have been resident at 14 Bartrams Lane, Hadley Wood, EN4 0EH since April 1972. My (late) husband was already a member of the Hadley Wood Association (HWA) and our membership has continued unbroken for over 50 years. Our children went to Hadley Wood Primary School and we have been active contributors to the community in many ways. Living in Bartrams Lane, adjoining Green Belt and the Open Space leased to the HWA, I am particularly aware of the importance of local green space to the unique character of this part of the borough. I have also appreciated the principled way in which LBE has normally valued green space, trees, and local amenities across the borough and declared its aim to establish itself as the 'greenest' London borough.

I do not approve of the proposal to remove the Green Belt designation from the area of land SA45 between the rear of residential housing on Camlet Way and the rear of properties on Crescent West. Furthermore, I do not approve a proposal that the site is deemed suitable to be designated for housing development nor classed as suitable for 'intensification'.

The principle of Green Belt designation. Green Belt is a vital principle in giving 'lungs' and space to people living in London. London is already a densely used area and it is important that its separation from surrounding built-up areas is preserved. This is all the more necessary given the need to address climate change – a local, national and planetary priority - recognised by LBE in its declaration of climate emergency. The Green Belt, including both extensive and smaller pockets, is also essential to maintaining biodiverse habitats. Removing Green Belt designation from this site is contrary to good practice in tackling climate change, biodiversity and the preservation of green space, which has been even more appreciated since the onset of the Covid-19 pandemic. Therefore, to justify removing Green Belt designation from this location, the local authority must show beyond all other considerations that it is essential to providing land for housing that is not available elsewhere by any other reasonable means. This case is not made by the DLP.

The location. Although the fields themselves are modest in size they are important in an established Green Belt corridor in an Area of Special Character that draws together three local authority areas – LBE, London Borough of Barnet and Hertsmere. This 'green corridor' links Barnet through to the north and east of Hadley Wood. The site provides continuity and a green outlook for local residents, walkers and cyclists. The fields adjoin the Hadley Wood Conservation Area which is in the central area of Hadley Wood. If the fields were removed from the Green Belt, and designated as suitable for housing, this would harm the heritage aspect of both Hadley Wood and Monken Hadley Conservation Areas. The fields constitute an important flood overflow space, with their height above sea level dropping down across the site and approaching 85m, one of the lowest spots on the northern side of Camlet Way. In addition to providing space for flood overflow, the site is already vulnerable to run-off from the surrounding and higher residential roads. There are endemic difficulties in Crescent West and East from local flash flooding in heavy rain; as climate change brings episodes of heavier rainfall, this is likely to worsen.

Suitability of the area for potential housing development. There is no point in removing Green Belt designation if, on closer scrutiny, any particular site is not appropriate for its envisaged purpose. An earlier version of the DLP did not include removal from the Green Belt of the SA45 area between Camlet Way and Crescent West and its designation for housing although the Duchy of Lancaster had proposed it should. This suggests there is at least some question at LBE about its suitability. Given that it appears to have been included now after further representations by the Duchy of Lancaster, it is important that LBE steps back and takes its own independent view of the pros and cons as a third party inevitably has its own interest in the site being made available to develop. The criteria for removal from Green Belt and designation for housing should reflect the priorities of the Borough and conform to its established policy objectives. Removal of Green Belt status should only be considered if it is clear that all alternative (especially brownfield) sites are fully exhausted. It is important to note

that Hadley Wood is not identified in the DLP as a 'place-making area'. The proposal is that any future housing development would happen at the later end of the plan period. With a maximum of 160 units, it is not clear that by 2030, 160 units will be required or that the site would, at that point, be the only available – let alone suitable – location. The results of the census are needed to better determine the level and location of greatest need in the Borough. However, if the DLP as currently drafted goes ahead in respect of this site, by 2030 the damage will have been done by removing the area from Green Belt.

There are considerable downsides to the suitability of the site for housing development with regard to loss of amenity, increase in road traffic and pollution in a residential area. In addition there is little scope for the services required for reasonable provision for the number of potential new residents of 160 units; it has become accepted that new housing developments must incorporate the range of facilities that people need for well-being and community life. The primary school is already over-subscribed and there is no space to expand on its current site without an unacceptable loss, for instance, of the school playing field; there is no obvious alternative site to build a school in Hadley Wood. There is a limited row of shops and, again, no obvious space to expand them to provide more extensive local shopping facilities. There are no medical facilities in Hadley Wood, such as GP practice or pharmacy, and the nearest ones are difficult to reach as needed without a car given limited east-west public transport links. The publicly provided social or well-being facilities comprise the Open Space and a small play area adjacent to the school - no library, no youth club, no post office (and to provide one might reduce shop floor space for daily shopping), no entertainment or social venues apart from a modest-sized cafe and a restaurant (the facilities of the HWA Centre are not able to be open for public and casual usage during daytime or general evening hours).

Intensification. A blanket application of a policy of 'intensification' without regard to the suitability of each and every public transport hub does not make good sense. Hadley Wood fails three of the four criteria for intensification. Moreover, its Conservation Area is at the centre of its 800m intensification zone thus constraining the social capital and infrastructure improvement required to provide adequately for 160 housing units: as development in a Conservation Area must be in keeping with the historic aspect of the area, this limits development of facilities required for the proposed number of units. Contrary to the criteria for intensification, Hadley Wood has a low rating for public transport accessibility therefore it is highly likely that housing development will create more private vehicle use as public transport links are unsuitable and there are no plans, and little scope, for making substantive improvement or diversification of such links. As noted above there are limited shopping facilities available or possible; there is an absence of the required social infrastructure envisaged in the blanket intensification objectives. There are also virtually no employment opportunities in Hadley Wood or feasible expansion therefore making it likely that many residents of new housing units would require private vehicle use to access work.

In summary, therefore, my central point is that before a local authority decides to remove Green Belt designation it must be able to show there is no feasible alternative and the housing units are both required and cannot be reasonably sited elsewhere. The inclusion of this area in the LBE Draft Local Plan does not satisfactorily meet the Borough's criteria. Moreover, it contradicts existing policy objectives to which LBE has already devoted considerable resources such as the Green and Blue Plan and LBE's stated intention to be a leading 'green' borough in London and its own criteria for selection of a location for potential housing development.

I recommend that the DLP should revert to the previous versions that did not include the site SA45 in Hadley Wood, i.e, the proposed site allocation is removed from the next version of the DLP; the site retains its current Green Belt status; the fields in question are not removed from the Green Belt; the land is not designated as suitable for housing development; nor deemed suitable to qualify for intensification.

Yours sincerely,