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## Land at Hadley Wood (SA45 and LP465) should remain as Green Belt

1. Land at Hadley Wood should remain as Green Belt. The site can then continue to make its contribution to the last and most urgent of the five purposes of Green Belt defined in the National Planning Policy Framework (NPPF): to assist in urban regeneration by encouraging the recycling of derelict and other urban land.
2. The Green Belt fulfils its recycling purpose by obliging suburban Local Planning Authorities to regenerate urban areas to meet their housing targets instead of choosing the easier option of developing greenfield sites. The authors of the Draft Local Plan clearly have not understood this purpose. For example they have ignored the relative contribution of different-sized parcels of Green Belt to the purpose of urban regeneration by assuming that “all Green Belt land is considered to make an equally strong contribution to this purpose”. This is incorrect; the larger the parcel released, the more its release hinders urban regeneration. The land at Hadley Wood is large enough to significantly impact urban regeneration.
3. The Draft Local Plan does not assess the harm to communities left in deprivation due to poor housing by its proposed release of Green Belt. It assesses harm the other four purposes of the Green Belt which directly concern the lives of the affluent communities who live close enough to benefit from rural areas, The Draft Local Plan rates each parcel of Green Belt on the level of harm caused to these communities if released. It assesses the harm caused to them by the release of the Hadley Wood site as High. Page 48 of [https://new.enfield.gov.uk/services/planning/green-belt-and-mol-](https://new.enfield.gov.uk/services/planning/green-belt-and-mol-assessment_appendices_part4-luc-2021-planning.pdf)

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[assessment\\_appendices\\_part4-luc-2021-planning.pdf](https://new.enfield.gov.uk/services/planning/green-belt-and-mol-assessment_appendices_part4-luc-2021-planning.pdf) states that releasing a slightly different parcel would reduce the harm. This again shows unawareness of the impact on urban renewal. The release of any acre of Green Belt will cause the same amount of harm to residents and potential residents of areas in need of regeneration, however unattractive the landscape.

4. Enfield Council and developers have seized on the sentences in the London Plan which permit the release of land from the Green Belt ‘in exceptional circumstances’. It is unfortunate that when adding these sentences to the Mayor of London’s text the Secretary of State did not impose any obligation on the Council to explain what ‘exceptional circumstances’ exist. Enfield Council has not volunteered any explanation. The Council should be aware that ‘exceptional circumstances’ also allow them to redeploy ‘industrial land in active employment use’ in urban areas to meet their housing targets. The Council should be aware that ‘exceptional circumstances’ also allow them to redeploy ‘industrial land in active employment use’ in urban areas to meet their housing targets (Council’s Housing Numbers Paper 2021 at para 2.1.7). That paragraph also quotes the London Plan’s requirement that Councils should ‘demonstrate that they have made as much use as possible’ of such alternatives before releasing Green Belt land.

The Council has not demonstrated this. The Draft Local Plan shows that Enfield Council has not been sufficiently encouraged to proactively seek out other urban land for additional housing.

5. When assessing the potential contribution of industrial land to housing, the experience of the Covid-19 pandemic should encourage the Council to consider *'how industry can be integrated in residential areas'* as stated in the Mayor of London's *Draft Industrial Intensification Primer* (2017). There will certainly be more home working in some industries, to the benefit of the economy.

6. As a member of the Hadley Wood Association living on Green Belt nearby I feel that a revised Draft Local Plan that describes how the Green Belt helps urban regeneration will appeal to both affluent semi-rural residents and residents of urban areas in need of regeneration. Even we who live on the Green Belt are inconvenienced by deprivation caused by poor housing elsewhere in the Borough.

7. A revised Draft Local Plan should focus on its placemaking vision for regeneration, giving credit for this focus to the constraints of the Green Belt. Enfield has unequalled opportunities for recycling urban land in a way that benefits all residents of the Borough. It has many run-down areas with exciting potential for developing additional housing.

From the National Planning Policy Framework (NPPF):

**138. Green Belt serves 5 purposes:**

(a) to check the unrestricted sprawl of large built-up areas;

(b) to prevent neighbouring towns merging into one another;

(c) to assist in safeguarding the countryside from encroachment;

(d) to preserve the setting and special character of historic towns; and

**(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**