
This representation is made to complement the detailed submission from the Hadley Wood Neighbourhood Planning Forum. The New Enfield Local Plan 2021 aspires to be Green and Sustainable. However by encouraging development on verdant gardens and green belt locations in car dependent communities it FAILS.

It fails to recognise that recent floods are a direct consequence of the combination of overdevelopment and climate change; both are made worse by this Plan.

And it is simply unnecessary to construct on gardens and the green belt, given the failure to fully develop brown field sites.

We object in the strongest terms to the following proposals in the New Enfield Local Plan 2021.

1. We object to the Small Site Policy (DM H4). The policy fails to differentiate between verdant private residential gardens and other (previously developed) small sites such as garages and small industrial workshops.

Approximately 30% of green space in Greater London is within private residential gardens, and this resource plays a huge role in mitigating the impacts of climate change, managing rainwater run-off, supporting biodiversity, and in protecting local character.

 - a. We note with dismay that the Blue and Green Strategy (Section 6) fails to include a section on the importance and value of Private Residential Gardens. There is no coherent strategy for this vital asset.
 - b. Housing in Hadley Wood has grown by over 34% since 2000, entirely as small site development in private residential gardens. When the impact of extensions, outbuildings and hard standing is added a large area of verdant green space and hundreds of mature trees have already been lost. The proposed policy would add to this harm.
 - c. Incidents of flooding and waterlogging in Hadley Wood have increased, with no long term investment in the overall capacity of the drainage system. All rainfall drains into two streams (Monken Mead and Greenbrook) that frequently flow at maximum capacity, particularly through the culverts under the Great North Railway line.
 - d. With climate change leading to more frequent incidents of extreme weather, such as the intensive storms experienced this summer, over-development of verdant gardens should be subject to greater scrutiny, not made easier.

The Small Site policy fails to address the Climate Change Emergency declared by Enfield Council. The Small Site policy fails to give sufficient weight to the Environmental Objective within the NPPF.

We note well intentioned policies such as Bio-diversity net gains (SP BG3) and Sustainable Drainage Systems (DM SE10), but our experience over many years of (the lack of effective) enforcement provides NO ASSURANCE that actual small site

development will comply.

A review of development in Hadley Wood since 2000 has failed to identify ANY SUBSTANTIVE enforcement action, including:

- No successful prosecutions.
- No restitution of non-permeable hard-standing.
- No demolition of development constructed without planning permission.
- No Council led solutions to waterlogging or flooding of neighbouring properties.
- No replacement of protected trees removed without formal permission.

We also note that Small Site Development will be subject to 'supplementary planning documents' and a 'Borough wide Design Guide', neither of which currently exist. Given the limitation of Council resources (human and financial) we have no confidence that these will be produced in a timely fashion and with sufficient granularity for the local neighbourhood.

Reference is also made to 'London Design Guidance', although this generic documentation fails to incorporate examples that are appropriate for a 'garden village' such as Hadley Wood.

Additionally, the Small Site policy is not supported by any infrastructure investment, in mains drainage, health, education, transport, etc. Growth without investment is unsustainable.

The absence of effective enforcement, relevant Design Guidance and investment in local infrastructure are further reasons to strongly object to the Small Site Policy (DM H4).

2. We object to all proposed development on the Green Belt, which is unnecessary given the failure to fully develop all brown field sites within the Borough (for example, only 5,000 of the planned 10,000 homes at Meridian Water are delivered in the plan period, and the Plan fails to respond to the 'Space to Build Enfield' report prepared by CPRE and the Enfield Society).

The New Enfield Local Plan fails to meet the NPPF criteria for the release of Green Belt land.

3. Additionally we object to all proposed development on the Green Belt and to the over intensification of development on private gardens, as the New Enfield Local Plan fails to adequately incorporate the opportunities to use excess office and retail space resulting from the Covid19 pandemic. Additional brown field sites will become available from these sources and must be factored into the plan.
4. We object to all policies (Small Sites, Green Belt, etc) that encourage development in areas of poor public transport and with poor accessibility to essential services by walking, cycling or public transport. The mere presence of a train station (with infrequent services) or a local shopping parade is insufficient rationale for the intensification of development in areas that are very, very dependent on private car usage.
 - a. Hadley Wood is in the lowest PTAL zones in Greater London (0, 1a, and 1b) and TfL data also identifies that peak time public transport accessibility travel times to healthcare, secondary education, retail, and employment exceeds 45 minutes (and in some cases 1 hour). The Small Site policy should differentiate locations for

intensification in a more nuanced and environmentally friendly manner.

- b. No significant improvement to public transport is planned for Hadley Wood – additional homes would undoubtedly increase car usage.
- c. There are no regular or peak time bus services that connect to the train station.
- d. Some pavements (such as Waggon Road) are unsuitable for pedestrian use, being uneven and dangerous and also overgrown.
- e. And there are some roads within 800m of Hadley Wood station that do not even have a pavement, yet these locations are still prioritised for development by the Council!

A 'one size fits all' policy does not reflect local variations in transport, amenities and environmental challenges including flood risk. A more nuanced approach to Small Sites which recognises local factors will ensure development is genuinely sustainable. The model proposed by Bexley is a great template that Enfield could readily adopt, a model policy that strengthens the London Plan rather than blindly following it.

[Local Plan Spatial Strategy Technical Paper \(bexley.gov.uk\)](http://bexley.gov.uk)

Additionally, the Small Sites policy should only be introduced on a locality by locality basis after all components necessary for sustainable development are in place. These should include bespoke design codes, the infrastructure investment plan (drainage, transport, health and education), and an implemented Enforcement improvement plan. These deliverables are essential to ensure the delivery of sustainable development, and approval by local representatives should be a key milestone for the 'go live' of the Small sites policy.

Housing growth in poorly accessible car dependent communities in the northwest of the Borough will add to road congestion, air pollution, and impact Climate Change. Growth focussed on areas such as Hadley Wood fails to meet the Mayor of London's definition of 'good growth'. It is 'bad growth' and does not meet the Environmental Objective in the NPPF.

5. We object to revisions to the Tall Building Policy (DM DE6) that ignores all prior Council Policy and Studies on the location of such buildings. High ground (such as the Cockfosters ridge), proximity to Green Belt, and proximity to Conservation Areas are all very pertinent exclusions and should continue to be so. The detailed Council Report 'Location of tall buildings and important views in Enfield 2012' stresses all these considerations but has been ignored in the proposed policy drafting.
6. We object to the inclusion of the specific site allocation (SA 45) Land between Camlet Way and Crescent West.
 - a. This is a valued landscape and is clearly identified as such in many recent Characterisation Studies which all recommend its retention (appendix 1 below).
 - b. It is also identified by Enfield Council as an area of archaeological importance, with field patterns unchanged since enclosure in 1777, and part of the site of the Battle of Barnet (Battlefields Trust research 2005).
 - c. This location alongside Monken Mead Brook is subject to surface water flooding (per the Environment Agency) and plays an important role in moderating rainwater run-off into the river – it is both an unsuitable location for building, but also a key component of the wider flood protection of land downstream.

- d. The meadows are a haven for biodiversity, with numerous species of wild flowers and butterflies identified in the locality.
7. We object to the exclusion of very important views of Hadley Wood from the top of Stag Hill and the Hertsmere end of Wagon Road from policy DM DE5 (Strategic and Local Views). These are clearly referenced in the Enfield Characterisation Study 2011, and need reinstatement.

In summary, the New Enfield Local Plan 2021 is unwelcome, unnecessary, and potentially catastrophic. This summer the world has experienced very extreme weather (in Germany, China, New York, plus many more), and the latest reports from Climate Scientists are urging greater action. Parts of London received a months rainfall in several hours on both 12th and 25th of July (with significant flooding including in Hadley Wood). The Guardian reported:

Mary Dhonau, a former CEO of the National Flood Forum and now an independent flooding expert, said so much damage had been done to drainage and sewage systems that everyone was at risk of flooding - even those who live on hills.

Cities need to undergo a "wholesale sponge-like transformation", she said.

"We've done this to ourselves. We've paved over the equivalent of 22 Hyde Parks by digging up our gardens so we can park in them. We've built super-basements, we're expecting drainage and sewer systems hundreds of years old to cope with massively increased population sizes, and of course there's climate change."

Paul Cobbing, the current CEO of the National Flood Forum, said authorities had to act to protect cities from future flooding. "Last year it was Norfolk. This year it was London and Peterborough. Next year - or tomorrow - it will be somewhere else. Government has to initiate a cross-sector approach to deal with this issue. We need to act."

We cannot continue to concrete over our gardens and our open spaces. We cannot continue to direct housing growth to areas of poor public transport and non-existent public services, adding car journeys and increasing emissions. But this is what the New Enfield Plan proposes. Far from being environmentally friendly this plan adds to the risk of climate change and the consequently risks of flooding and poor air-quality.

And this is totally avoidable, if only the development of brown field sites was accelerated.

Significant changes are required.

Appendix 1

Characterisation Studies of Hadley Wood (with refence to SA 45) – relevant extracts

Enfield Area of Special Character Boundary Review (Enfield Council March 2013)

Recommendations 4.1 The following changes are recommended to ensure that the Areas of Special Character continue to reflect the important historic and exceptional landscape character traits that should be protected for their intrinsic quality

Hornbeam Hills South – (this specific location!)

4.26 The Hornbeam Hills South Character area is the south eastern corner of a larger landscape character area identified in the Landscape Character Assessment for Southern Hertfordshire (HCC,2000) The area has a strong undulating arable landscape with a geometric pattern of large fields. This area is similar to the wider area to the west and is an attractive landscape of agricultural land with long distance views to the woods of Wrotham Park to the west. The character area is part of a larger area of significant Green Belt which separates Potters Bar from Hadley Wood.

Monken Hadley Conservation Area Assessment

The two fields bordering the Duchy land to the north-west are within the Monken Hadley Conservation Area as well as the Green Belt. The Barnet section of Camlet Way is also in the Conservation Area. (No reference to this is made in the New Enfield Plan, a major omission).

Draft Neighbourhood Plan

The 'setting' of Hadley Wood, surrounded by Green Belt farmland and mature woodlands, is to be treasured and deserves continued protection. The open space within our boundary provides areas for recreation and wildlife. Together they form a major part of local character, play a key role in flood mitigation, and contribute to some of the cleanest air quality in South East England.

Hadley Wood Heritage and Character Assessment – AECOM 2018 (section 5.1)

There are positive aspects of character which should be sustained, reinforced or enhanced. These include:

Views with a verdant backdrop are visible across the area, particularly from the higher ground along Camlet Way and the roads descending into the valleys of Monken Mead and Green Brook to the north, east and south.

Surrounding landscape with semi-natural, or agricultural character which acts as a buffer separating Hadley Wood from other urban areas.

Hadley Wood Conservation Area – Character Assessment Feb 2015

The typology of this area is of gentle ridges running East to West. The conservation area is located on the north side of one of these ridges (from Camlet Way into the valley of Monken Mead Brook). Attractive breaks occur in the street frontage on the north side of Crescent West, where houses give way to open country, with views out to the northwest of hills and woods. This key view is highlighted in figure 4.

This is the Duchy of Lancaster land which is the proposed area of Green Belt to be developed.

Hornbeam Hills landscape character assessment (South Hertfordshire 2000)

The area is located south east of Potters Bar, north of Hadley Wood and east of Wrotham Park. A large-scale strongly undulating landscape overlaid with a very noticeable pattern of geometric fields and straight roads. Scattered trees heighten the straight and linear boundaries.

KEY CHARACTERISTICS, steeply sloping valley landforms • straight roads of Roman or earlier origin, with wide verges • sparsely settled • discrete woodlands to north • Enfield Chase to south • sweeping views over landforms.

There is a marked undulating landform with prominent slopes, and a narrow ridged lip that runs

to the western and northern edge.

The primary land use is arable with limited pasture including sheep on the upper slopes.

HISTORICAL AND CULTURAL INFLUENCES The listed battlefield site of the Battle of Barnet (1471) at Monken Hadley lies in the south-west corner of the area.

The geometric field pattern was created following the parliamentary enclosure of the former Chase in the late 18th century. This pattern is still intact, which is partly what gives the area such a distinctive character. Field sizes are medium to large in size and geometric in shape. Most of the oak trees in the hedges were planted following the enclosure of the Chase.

The area is widely visible from the perimeter fringes and within the area from the local roads. This is a large-scale coherent landscape with an open feel.

Rarity and distinctiveness. This area is an unusual landscape type for the county. The distinctiveness is primarily a function of the unified enclosure pattern and remnant areas of ancient semi-natural woodland.

STRATEGY AND GUIDELINES FOR MANAGING CHANGE: IMPROVE AND CONSERVE

- promote the creation of buffer strips along watercourses to prevent pesticide, herbicide and fertilizer run-off and provide habitat for wildlife; encourage their linkage to eco-corridors within the wider landscape. Retain open watercourses as field drainage
- support the retention and management of the strong geometric field pattern
- promote hedgerow restoration through locally appropriate measures, including coppicing, laying and replanting/gapping-up
- promote the creation of buffer zones between intensive arable production and important semi-natural habitats and the creation of links between semi-natural habitat.

Enfield Characterisation Study (Urban Practitioners February 2011)

The borough has a unique character influenced strongly by its topography and balance of development and landscape.

- There are many areas of real quality both in terms of highly attractive and well managed sections of rural landscape and historic centres within the urban areas of the borough, and these areas are to be celebrated.

Landscape characteristics

- Recognising the high landscape quality and historic value of the borough's Green Belt, and the local and regional significance of the rural areas of the borough and the importance of preserving a clear interface with adjoining urban neighbourhoods; The need to protect and enhance the borough's landscape and ensure against the risk of poor land management practices and their resulting impact on local character.

- Adopting policies which will address the issues of biodiversity and climate change adaptation affecting the built form of the borough.

The importance of protecting the urban-rural fringe and immediate interface in order to support high quality gateways into and out of the borough, and avoid the detrimental impact of creeping development at the edges of the urban area.

The higher ground provides long views across the borough from the west, many from the historic routes which follow the ridges through the north and west areas.

Major landscape assets - the Lee Valley and Green Belt are major landscape assets.

(There are a number of areas in the borough with limited access to public transport. These include the north western rural parts of the borough.)

The South Hertfordshire Landscape Character Assessment identifies three landscape character areas which adjoin Enfield, two of which extend considerably into the borough. The largest of these is character area 26 – the Hornbeam Hills (Enfield Chase) which extends from the south east of Potters Bar, around the north of Hadley Wood and south east to the urban edge of

Oakwood and World's End. It is identified as an area of large-scale landscape, strongly undulating with a pattern of geometric fields and straight roads. It is characterised by steeply sloping valley landforms, straight roads, sparse settlement patterns and sweeping views over landforms.

Hadley Wood is classified as residential, perimeter block, large suburb.

Retain an almost rural character.

Very low density areas both favour and require the car. The sparseness of the population is not able to sustain local shops and facilities in easy walking distance. Pedestrians can be poorly provided for, with a footway on one side of the road only or very narrow provision, as found on Waggon Road in Hadley Wood.

Rural Green Space – Farmland ridge and valleys

The largest and most widespread landscape character type in the borough is 'Farmland ridges and valleys'. **This is a very attractive undulating agricultural landscape** which is sparsely populated and has a geometric field pattern. **It is an important area of high quality open landscape with a special character which is highly valued.** Much of the landscape is in productive agricultural use and all of it is protected as Green Belt.

Distribution The area of this landscape type extends from Hadley Wood in the north west corner of the borough, across the whole of the top northern edge of the borough to Capel Manor and Bulls Cross in the north east. Key characteristics • Rolling landform of ridges and valleys • Arable and pastoral farmland • Long views from the north towards the urban edge of the borough • Sparsely populated with occasional farmsteads • Mature native species hedgerows with frequent mature hedgerow trees (mainly oak).

Role and significance

The farmland ridge and valleys landscape type is the borough's most important landscape type and forms a special area of landscape character which is a major asset for the borough. It is of both landscape and historic significance. The general layout was established following the enclosure of Enfield Chase in 1777, and resulted in the geometric layout of fields enclosed with blackthorn and hawthorn hedges and scattered blocks of woodland. Most of this historic field pattern remains intact and the landscape is a good example of an 18th/19th century enclosed landscape.

Most of the area of Farmland Ridges and Valleys Landscape type is of **high landscape quality and is highly valued by the borough's residents.** The landscape is well maintained and is a productive agricultural landscape which has not become weakened by the introduction of alternative urban fringe land uses. It has a strong network of urban blocks (many of which are Ancient or Semi-Ancient woodlands) and many large mature hedgerow trees that punctuate the landscape and provide the character of a well wooded landscape. **There are many points (particularly from Stagg Hill, the Ridgeway and Waggon Road) where fine, long distance views across the rolling landscape can be enjoyed.** Many of these feel very rural and remote in character and the area provides a valuable opportunity to enjoy a special rural landscape which is easily accessible from adjacent urban areas.

The designation of the area as Green Belt has meant that the landscape has been well protected from twentieth century development and in places feels quiet and remote despite its proximity to the edge of the London conurbation.

Key issues • High quality landscape is a major asset to the borough. • Protection of the Green Belt. • Maintaining agricultural activities. • Protection of the special qualities of the landscape. • Improving access to the countryside. • Landscape management (hedgerows, woodlands and hedgerow trees). • Enhancing nature conservation (ecological corridors). • Separate rural

identity and distinctiveness of the Borough's rural settlements.

Implications • The designation, protection and promotion of areas within this landscape type as part of a 'Special Landscape Area' should be considered. • The existing Green Belt boundary should be retained and protected, and future development and land use changes resisted.