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Having lived in Hadley Wood for 22 years, and being a member of the Hadley Wood Association and the Hadley Wood Neighbourhood Planning Forum, I was interested in reading your Reg 18 consultation document.

The Council is in a difficult position, having to balance competing priorities and interests. While there are certain positives in the Plan, some of the laudable objectives are undermined by conflicting policies - for example, the extensive green & blue policies are entirely undermined by the proposal to build a quarter of all new housing on current Green Belt land.

Key objections:

- The documents contain a wide range of housing requirement numbers and not all sources of supply have been assessed (e.g. SIL sites have been excluded). As neither the demand nor the supply have been duly established no decision on Green Belt release can be made.
- In addition to the foregoing, the exceptional circumstances have not been identified for site SA45, as required under the NPPF.
- Mistakes were made in the preparation of the Plan. For example, the Evidence Base does not appear to contain documents outlining how the Duty to Cooperate has been complied with, the fact that site SA45 is bordered by the Monken Hadley Conservation Area is not mentioned anywhere, the arbitrary overriding of PTALs for locations near stations is not justified (and contradicts the London Plan) and the Plan implies that all locations, including Conservation Areas, can build up to 21m height.
- Hadley Wood lacks amenities (no GP, dentist, schooling, supermarket, leisure, etc) and local public transport is poor. It is a car-dependent location that is unsuitable for sustainable development.
- The Transport Study prepared for the Council identifies that the A111 and Hadley Road already operate at 100% of capacity, and a material increase in the number of residents in Hadley Wood (at site SA45 and/or intensification around the station) and at the proposed Chase Park development will result in a worsening of congestion. The resulting air pollution conflicts with the Climate Change Action Plan and the NPPF.
- The assumption that the presence of a railway station alone equates to good public transport links is wrong. The railway line is useful for commuting into central London, although government research shows that only 19% of outer London commuting journeys are by national rail. More importantly, the railway line does not provide a link to Enfield, Cockfosters or Barnet, and is useless for travel to schools, supermarkets, leisure facilities, etc.
- The intensification around stations in theory makes sense, however, per the above points, the lack of amenities and local public transport must be taken into account. Enfield

should use the precedent contained in the Regulation 19 submission by LB Bexley, who have cut the distance from 800m to 400m where there is only a “local shopping area” (Hadley Wood only has a local parade), and who measure the distance based on actual roads and footpaths, not as the crow flies.

- Site SA45 rates strongly against the purposes of the Green Belt, and the SHLAA/HELAA acknowledges the distance from amenities. It is also worth noting that the information provided to the Cabinet highlighted the harm to the heritage assets, which information is not included in the public consultation documents.
- Hadley Wood residents support good growth but between 2000 and 2018 the number of homes increased by 35% without a commensurate improvement in amenities and infrastructure (e.g. drainage/sewers). It is not a sustainable development location and cannot accommodate further material growth without significant investment.