Strategic Planning and Design Enfield Council EN1 3BR localplan@enfield.gov.uk

13th September 2021

Dear Enfield Council,

Draft Enfield Local Plan - SiteSA45 - Hadley Wood

We are writing from the Hadley Wood Conservation Area Study Group to provide our views on the proposals in the Enfield Plan for SiteSA45 Green Belt land, adjacent to Hadley Wood Conservation Area.

The Hadley Wood Conservation Area Study Group is a group of residents living in the Hadley Wood Conservation Area and nearby who have a particular interest in the preservation and enhancement of the character of the Conservation Area. It operates as part of the Enfield wide Conservation Area Group (CAG) that has recently been merged with the Environment Forum.

The proposal to release land behind Camlet Way and Crescent West from the Green Belt for the development of 160 new homes substantially harms an important Enfield heritage asset, namely the Hadley Wood Conservation Area. It incidentally also harms an adjacent conservation area, the Monken Hadley Conservation Area.

The damage to the Hadley Wood Conservation Area takes many forms, among them are the following;

- 1. The proposal is that the main entrance to the proposed development leads directly from Bartrams lane which is itself part of the Conservation Area. This is proposed as a wide entrance through which it is presumably intended that the majority of traffic into and out of the proposed site will pass. However, as a matter of simple logic, in order to reach the entrance to the development that traffic must, of necessity, pass through the Conservation Area. It requires little imagination to foresee the increase in use of Crescents East and West which are already overcrowded with parked cars throughout the day. They are relatively narrow roads designed over a century ago to be quiet tree lined roads within, complementing, and contributing to, a leafy and tranquil setting. That is the heritage genesis of both those roads which this proposal will, at a stroke, destroy beyond redemption.
- 2. The visual aspect of the proposed development directly from the Conservation Area is, without any question, a residential amenity for the residents of the Conservation Area and those who pass through it. The spectacular natural beauty of the green belt in this location has been set out in many documents, including the Borough of Enfield's own publications, including the 2016 Hadley Wood Conservation Area Character Appraisal, where the view from Crescent West to this field is highlighted as a 'key view'. The quality of those visual aspects from the Conservation Area are beyond dispute. That amenity, as important a part of the raison d'etre of the Conservation area as any other, will, at a stroke, be removed forever.

The views created by both the gap in the current vegetation needed to construct an entrance road and the views created by the natural slope of the land carpeted with closely built houses will be a jarring, a literal, blot on the landscape, which will cause permanent substantial harm to the Conservation Area.

3. The proposed release of Green Belt land will cause additional substantial harm to the Conservation Area through the creation, on its doorstep, of 160 households, all of which would only have immediately available to them the very limited amenities which Hadley Wood provides. In considering this issue it must not be overlooked that all the retail and transport amenities that exist within the wider Hadley Wood area are sited in the middle of the Conservation Area, and so any additional strain on those limited resources would primarily affect the Conservation Area.

It is already fully accepted by those who have any knowledge of Hadley Wood that local amenities are, to put it at its most generous, very sparse. Transport links are poor, the station provides a limited north/south service which does not link to an underground station until it reaches Finsbury Park going south. The bus service is lamentable, both in its frequency and its reach.

There are no facilities within reasonable walking distance. Wider afield the picture is little better. Enfield's document, Cockfosters Ward Profile:2021, paints a gloomy picture. In the entirety of the Cockfosters Ward, in which Hadley Wood sits, to serve a population approaching 15,000, there are two state primary schools, one state secondary school, and one library, three NHS doctor's surgeries and three NHS dentists. Other than one of the two state primary schools none are within walking distance of any current Hadley Wood resident and will, therefore, not be within walking distance for any of the hundreds of new residents which would be introduced to Hadley Wood if the Green Belt land is released for development. The Hadley Wood primary school is already heavily over-subscribed.

That means only one thing, Hadley Wood, with the Conservation Area at its epicentre, would have an additional 160 car dependant households in addition to all the current car dependent residents. It only takes a little sensible thought to realise that such an additional burden to the already limited resources Hadley Wood has to offer residents will fall directly on the Conservation Area.

- 4. The current civil engineering infrastructure in Hadley Wood has been rendered inadequate by the addition in the last few years of a high number of new dwellings as residents have developed their back gardens. Parts of Hadley Wood are prone to flooding and that is exacerbated by the fact that we now have too many properties dependant on waste and sewerage systems that were not designed for the number of houses now using them. The addition of 160 new households, all at once, to the current drainage and sewerage systems is a recipe for disaster. The Draft Plan nowhere recognises this very real issue and so, clearly, there is no intent to match the proposed introduction of 160 households with proportionate sewage capacity. The increased flood risk that such development would bring is a recipe for disaster which will harm the whole of Hadley Wood and, by definition, in doing so will harm the Conservation Area.
- 5. It is a widely accepted principle that a Conservation Area can suffer substantial harm through damage to its immediate environs. Because of the juxtaposition of the Hadley Wood Conservation Area and the proposed Green Belt release that Green belt lad is part of the Conservation Area's immediate environs. The development of the proposed released land would cause it substantial harm. The point is so obvious it barely merits discussion. That said the fact remains that the proposed development land has remained untouched for centuries which has allowed it to gradually create its own biodiverse status. It is the home for

mammals, including foxes and muntjac deer, birds of many species, including red kite, and insects, with many species of butterfly observed, all of which exist symbiotically and contribute to the biodiversity of Hadley Wood, and the Green Belt's immediate neighbour, the Conservation Area. In addition it has developed over the centuries its unique plant life with self-seeded hedges and native trees and other vegetation. This has created the habitat on which the living creatures and invertebrates depend for their existence. Destroying this habitat would do obvious serious harm to the biodiversity of that land, and it is beyond argument that the Conservation Area would be substantially harmed by that destruction of the biodiversity assets of its setting.

6. Development on gardens and green space that blocks the view of the leafy backdrop between the houses in the Conservation Area has been consistently rejected by Enfield Council and upheld by the planning inspectorate on appeal. (eg 21-25 Lancaster Avenue (17/00436/FUL, 16/01452/FUL, 15/04469/FUL, 15/01166/FUL, see attached appeal decision). By comparison, a housing estate on the proposed site would be far far more damaging. We request Enfield Council to be consistent in its approach to development that impacts on the Conservation Area.

The proposed release of the Green Belt land bordering the Conservation Area is, by reason of what is set out above, is damaging to, not only the Conservation Area itself, but also, from a wider perspective, is damaging to the setting of an important element of Enfield's Heritage Assets, and as such should not be permitted to go forward as part of the final proposals.

The correct approach should be, we argue, that rather than seeking to destroy heritage assets Enfield should, in common with guidance from central government and many other local authorities, be actively looking to protect and preserve them.

The Enfield Characterisation Study referred to a need to protect local character, protect and enhance the local landscape and avoid creeping development. It is almost as though the proposer of the release of the Green Belt land has never read those words. It is certainly difficult, in fact it is impossible, to reconcile the stated aims of Enfield in its Characterisation Study with the intentions set out in the draft Plan that these objections concern themselves with.

One approach we would urge upon Enfield in order to preserve its scarce and valuable heritage assts would be to bring the Green Belt land under consideration into either the Hadley Wood Conservation Area or the Monken Hadley Conservation Area. That way future generations of local residents will be thanking, not cursing, today's decision makers.

We would be happy to discuss our views on these proposals further with Enfield Council representatives at your convenience.

Yours sincerely,