



## **Enfield Local Plan consultation - Draft Enfield Local Plan 2019-2039**

Thank you for informing us of your Councils consultation on the Draft Enfield Local Plan 2021 (Regulation 18) and inviting our views. Also, for informing us of the Adoption of Enfield's Blue and Green Strategy.

Enfield Borough is one of six administrative areas that border Welwyn Hatfield and the two settlements of Northaw and Cuffley are close to our shared border. Northaw is identified in our Local Plan as a Green Belt Village set in open countryside and washed over by (within) the Green Belt and Cuffley as a large excluded settlement (not in) the Green Belt.

We note the overarching spatial strategy is to provide for sustainable growth with supporting infrastructure across the borough whilst facilitating nature recovery and improvements to green and blue spaces and access to them. Also, that provision will be made for at least 25,000 new homes up to 2039 with a large proportion of the borough's future development needs provided by the four main placemaking areas of Meridian Water, Southbury, Crews Hill and Chase Park.

We have concerns relating to the Spatial Strategy and the proposals at Crews Hill. These are set out below.

### **Spatial Strategy**

The Spatial Strategy seeks to provide for 25,000 new homes to 2039. This target is comprised of the London Plan requirement of 1,246 homes per year up to 2029 and the target rolled forward to 2039 (equating to 24,920 in the plan period). The rolling forward accounts for 10 years of the 15-year plan period, assuming a 2024 adoption. The Council is concerned that rolling forward the London Plan requirement will result in an undersupply.

Any undersupply would result in an increase in London's growing backlog of unmet housing need. It would also drive increased levels of out-migration to surrounding areas. Migration is already a large component of Welwyn Hatfield's Full Objectively Assessed Housing Need (FOAHN). As such a lack of supply in the capital will place greater pressure on areas such as Welwyn Hatfield that form part of the wider regional housing market focussed on the capital, as households seek to meet their accommodation needs outside of London. Welwyn Hatfield is already having to release substantial areas of land from the Green Belt to meet the need for housing arising in part from current levels of out migration from London.

It is noted that there is a High Growth Option (Option 3) accommodating c.55,000 homes based on the target based on adopting the London Plan target until 2029 and then using the government's Standard Method of need calculation as a housing target beyond this until the end of the draft ELP plan period. The Housing Topic Paper states that this would address the objectively assessed housing need figure derived from the government's most recent Standard Method. The Council considers the Spatial Strategy should reflect the Enfield housing requirement in full and is unlikely to be sound if it does not.

### **Strategic Policy PL9 – Crews Hill**

We understand the ELP proposes 3,000 homes with associated community and social infrastructure and enhanced open space for Crews Hill. The Policy for the area refers to a comprehensive masterplan (in the form of an SPD), and that development must be brought forward in accordance with a planned and coordinated approach for this area as set out in adopted and emerging SPDs.

We support the masterplanned approach but have concerns regarding the proximity of this proposed development with the settlement of Cuffley. The proposal at Crews Hill is the closest of the strategic developments to Welwyn Hatfield, specifically the Parish of Northaw and Cuffley. The current gap between the settlements is approximately 3.5km and the strategy diagram indicates the gap would be reduced to 1.1km.

The proposed allocation SA27 Land at Crews Hill (ELP page 356) shows a 'place making' area extending up to the M25 and the Welwyn Hatfield borough boundary. An indicative location for housing-led development is shown within the place making area. The Enfield Green Belt and Metropolitan Open Land (June 2021) identifies that to facilitate the development at Crews Hill requires release of land resulting in High and Very High Harm to the Green Belt.

Enfield Borough Council will need to demonstrate exceptional circumstances for the release of this site from the Green Belt and demonstrate that the harm that would arise to the Green Belt from its loss has been minimised. This Council has serious concerns on the level of harm that will result to the Green Belt as a consequence of this allocation.

We note the Draft Infrastructure Delivery Plan that provides a schedule of required infrastructure to support the preferred growth scenario and that further transport modelling and identification of mitigation measures will take place at the next stage of the plan. We support further modelling and consider that LB Enfield will need to engage with the relevant

Hertfordshire planning and highway authorities under the Duty to Cooperated to understand the infrastructure implications arising from your proposals and to ensure they are appropriately mitigated.

Northaw and Cuffley Parish Council are in the process of preparing a Neighbourhood Plan and have raised significant concerns relating to the potential impact of growth on infrastructure within the Parish.

As you may be aware, the Welwyn Hatfield Draft Local Plan was submitted to the Secretary of State in 2016 and the examination remains ongoing. Stage 9 hearing sessions concluded in March 2021 and the Council received the Inspectors feedback in July. The Council is reviewing the Inspector's findings and observations ahead of a full Council decision on the next stages over the next few months. Subject to Council approval, public consultation on the proposed Main Modifications is envisaged to take place later this year.

The Council notes the draft Enfield Local Plan and requests that we are kept informed as the plan progresses. Welwyn Hatfield continues to be willing to constructively engage with Enfield Council as part of the duty to cooperate arrangements for both the Welwyn Hatfield and Enfield Local Plan respectively.

Yours sincerely