

**RESPONSE TO DRAFT ENFIELD LOCAL PLAN****11 September 2021**

I have been living in Bartrams Lane within arrowshot of the SA45 site that is proposed to be taken out of the Green Belt for more than fifty years. I chose to live here because it provides open views from my office and living room across countryside at the very edge of London that I believed was protected from development by the Green Belt. It was but a few miles from the surveying, mapping and land resource company I was employed by for over 26 years in Borehamwood, a short distance by car and occasionally by bicycle.

I am writing to object to the proposals in the new Enfield Local Plan to release 11.5 hectares of Green Belt for development and to create an Intensification Zone around Hadley Wood Station as both are contrary to the principles of the Green Belt Acts, the Hadley Wood Conservation Area, the threat of climate change, and sustainability for future generations.

**INTENSIFICATION AROUND HADLEY WOOD STATION**

The Hadley Wood Conservation Area sits at the centre of the proposed Intensification Zone around Hadley Wood Station. Any relaxation of the planning regulations regarding taller buildings and more intensive development within and around the Conservation Area would harm the character and ambience of the area and destroy the purpose of the Conservation Area that was established over thirty years ago. The heights of new buildings should be no higher than the rooflines of existing houses and should be for residential occupation only. Well established trees must be protected.

The stringent planning regulations currently in force that residents comply with at considerable cost, must be rigorously applied to any new development within the Conservation Area and around it that could damage the character of the area as described in the Characterisation Study.

**Hadley Wood unsuitable for Intensification**

Hadley Wood Station is identified on Figure 2.1 Key diagram for 'Intensification around transport nodes and town centres'. Hadley Wood is not a suitable site for intensive development as it fails three of the four criteria for selection and is centred over the Conservation Area that specifically precludes development that is not in keeping with the style of the historic architecture of the area.

Hadley Wood is rated in the lowest accessibility category, PTAL 1a/b. Access to town centres, shopping, medical services and other amenities is reliant on cars in this unsustainable location. There are no infrastructure and transport improvements listed in the new Enfield Local Plan.

Walkability is in the lowest categories because of the lack of local services and facilities within walking distance and the disjointed network of residential roads in cul-de-sacs and loops off through roads that cannot be improved.

The Conservation Area lies in the middle of the proposed Intensification Zone and is protected as a heritage asset with a consistent architectural style and a spacious leafy suburb of high quality, unsuitable as a site for intensification. Trees rise above the rooftops are an intrinsic part of the character of the area and must not be destroyed.

Hadley Wood is not an appropriate site for intensification and should be removed from the Enfield Local Plan.

## RELEASE OF GREEN BELT SITE SA45 FOR DEVELOPMENT



The SA45 site that Enfield Council proposes to release from the Green Belt for development is sandwiched between the Hadley Wood Conservation Area, the Hadley Wood Association Open Space and playing field, the Monken Hadley Conservation Area, three listed buildings and Green Belt that extends into Barnet and Hertsmere. Removing this site from the Green Belt would tear the heart out of the whole neighbourhood, destroy its integrity, cause visual damage, and expose the five protected assets to urban development and threaten further harm to the rural landscape.

Whereas Hertsmere has applied a wider-than-district approach and could find no reason to release any part of the Green Belt in this area for development, the draft Enfield Plan stops abruptly at the Borough boundary and ignores the continuous expanse of Green Belt that extends from Enfield into Barnet and Hertsmere.

The National Planning Policy Framework states that green belt should only be released for development in exceptional circumstances. There are no exceptional circumstances to justify releasing this site, rather there are exceptional reasons for retaining it within the Green Belt.

Houses within the proposed development would harm the character of the Conservation Areas with a gaping hole in the hedge at the entrance from Crescent West and destroy the tranquillity of the HWA Open Space, where meadows currently provide the foreground vistas that extend over the Monken Hadley Conservation Area and the Green Belt in Barnet and Hertsmere. Development between these two Conservation Areas would do irreversible harm by breaking the continuous rural link and destroying the natural landscape.



Aerial view showing the HW Conservation Area on the left, the threatened grassland in the centre, Monken Hadley Conservation Area on the right and the Monken Hadley Common in the background.

### **Heritage**

The fields in SA45 have been owned by the Sovereign since 1399, and by Norman Barons and Saxon Lords of the Manor before that. One of the hedges marked the boundary between the Saxon Manors of Enfield and South Mimms and between the now ceremonial counties of Middlesex and Hertfordshire since the ninth century. This site is an area of archaeological importance.

Before the Battle of Barnet in 1471 the Yorkist army marched through here in the night and tore down the palisade surrounding the deer park in Enfield Chase. Lancastrian cannonballs and arrows

were fired in retaliation. The Battlefields Trust has objected to removing this site from the Green Belt and is calling for an archaeological survey to detect cannonballs, arrowheads and other artefacts that may still lie buried in these undisturbed fields.

Other boundaries were created by the Act of Disenchantment in 1777, when George III divided his entitlement to Enfield Chase into plots for sale as agricultural leases. Uniquely the parish of Monken Hadley resisted enclosure and has retained Monken Hadley Common as community space, which is shortly to be protected by a new Act of Parliament; a clear indication of the importance attached to securing the heritage and rural landscape of the Green Belt so close to London.

In 1882 the Duchy converted the agricultural leases around the new Hadley Wood railway station into building leases, leading to the construction of the houses in the Conservation Area in a characteristic style. The land west of Crescent West, including the SA45, was retained as an agricultural lease. In 1943 the land around the station that had not been built on was sold by the Duchy to Enfield Council, facilitated by the Green Belt Act of 1938. This Open Space, including Bartrams Lane field and the tennis courts, is currently leased to the Hadley Wood Association.

The Duchy has been the custodian of Enfield Chase for over seven centuries and has imposed Restrictive covenants to prevent these properties being used for purposes that might be a nuisance, annoyance or disturbance to neighbours. The construction of 160 houses would constitute nuisance, annoyance and disturbance to neighbours and the wider community. The Duchy has yet to consult local residents about its proposals to develop this site on Green Belt land.



From the HWA Open Space there is a magnificent view of the rural countryside in harmony, across the wild flower meadow with 24 species of butterflies and 11 day-flying moths recorded over 23 years, footballers on the playing field and horses on the rough pasture of SA45, with a panorama over the Monken Hadley Conservation Area and the Barnet Green Belt in the background. Houses constructed on the SA45 fields would harm this exceptional view, destroy the landscape and unique biodiversity and heritage of the site. Photograph taken on 11 September 2021.

### **Biodiversity**

A unique biodiversity has developed in the three fields in SA45 as the grassland has been used to graze cattle and horses for many decades and the hedgerows are largely self-seeded with native trees and vegetation. Destroying this habitat would do serious harm to wildlife and the visual character of the landscape.

Grassland acts as a carbon sink to absorb pollution, whereas excavating the site for development would release carbon stored in the soil into the atmosphere. Global warming makes the conservation

of grasslands ever more important to achieve global carbon absorption targets, capture rainwater to reduce flooding and erosion, and bring benefits for biodiversity conservation.

This site must remain within the Green Belt to counteract climate change for future generations.

### **Replanting Woodlands and creating Wetlands in Enfield Chase**

The project to replant trees, excavate ponds and create wetlands along Salmons Brook is costing over £1.3 million with grants from the Mayor of London and the Forestry Commission, and the help of volunteers from the charity 'Thames 21'. This is intended to improve the local environment by absorbing carbon emissions, reducing flooding, trapping agricultural pollutants, and providing more public access to the Chase.

Allowing large areas of the Green Belt to be released for development would negate these benefits to the environment. There is an opportunity to create a similar wildlife corridor along Monken Mead Brook with ponds, wetlands and leaky SUDS dams to improve the rural landscape, enhance the wildlife corridor, reduce the increasing risk of flooding downstream and improve public access.

The National Park City Foundation has complained to ELB that it has been misrepresented to justify releasing Green Belt for development as other areas are being improved under the LNPC plan. All the land west of the railway should remain in the Green Belt in conformity with London's National Park City map.

### **Draft Neighbourhood Plan**

The draft Enfield Local Plan contradicts the objectives of the draft Hadley Wood Neighbourhood Plan which has been in preparation with LBE for over five years. This seeks to protect the Green Belt and retain the verdant character of the whole residential area with views between houses to open countryside. The proposals to release SA45 from the Green Belt and to create an Intensification zone around Hadley Wood Station have been included in the Draft Local Plan without consultation with the Neighbourhood Forum and in violation of the expressed aspirations of local residents.

### **Bartrams Lane**

The upper part of Bartrams Lane has been included in the SA45 site in error because it is owned by the Duchy of Lancaster. The upper lane, verges and hedge are in the HW Conservation Area. The lower part of the lane is owned jointly by Enfield Council and the owners of Nos.8, 10, 12 and 14 Bartrams Lane. There is a right of way along the lane granted by King George VI in 1951. The Green Belt was extended in 2013 to include the verge and hedge on the north side of the lane at the request of Enfield Council with the agreement of the residents, to compensate for the loss of Green Belt in Waggon Road. This established principle that loss of Green Belt in one area must be compensated by taking other urban land into Green Belt is impossible to implement in the case of SA45 and must therefore be withdrawn. Bartrams lane including the verges and hedges must be protected against development.

## **CONCLUSIONS**

1. Hadley Wood Station is not an appropriate site for intensification as it fails to meet the criteria set by Enfield Council. the HW Conservation Area lies in the middle of it and cars are essential to reach essential services. It should be withdrawn from the draft local plan.
2. There are no exceptional circumstances to justify the proposal to release Site SA45 from the Green Belt for development. The landscape, heritage and biodiversity of the site are exceptional and must be retained within the Green Belt. SA45 should be withdrawn from the Enfield local plan.