

Dear Sirs

Draft Enfield Local Plan –

Site SA45 – Land between Camlet Way and Crescent West, Hadley Wood

Policy DM DE6 Tall Buildings

Policy DM H4 Small Sites and Housing Development

I have lived in Hadley Wood for the past 30 years and both my children attended the local pre-school nursery and the Hadley Wood Primary School. The majority of our friends that live locally, also had children that attended both schools and we have all kept in touch. Our sense of community came from the primary school and we were all fortunate to have got our children into the primary school.

The school had to turn down 33 children in 2021 as they didn't have sufficient places and is now well over-subscribed with a long waiting list. We know of parents that live within a 10 minute walk of the school that have not been able to get their children into the school and have to drive outside the borough to take their children to school. If existing residents cannot get their children into the primary school, where will the children from the 160 proposed homes go to school? The answer is they will have to drive to another primary school within the borough. This is just one of many reasons why the proposed release of Site SA45 from the green belt for housing development, the policy to have tall buildings and intensification within 800m of Hadley Wood station are flawed. Hadley Wood is a car dependant location and access to the vast majority of key services can only be done by car.

I own and live at 75 Camlet Way which directly backs onto site SA45. I am a chartered surveyor of 30+ years standing working in the development sector.

I strongly OBJECT to the below policies on the following grounds:

Site SA45 – Land between Camlet Way and Crescent West, Hadley Wood

Policy DM DE6 Tall Buildings

Policy DM H4 Small Sites and Housing Development

Duty of Co-Operate

The Council did not engage with the Hadley Wood Neighbourhood Planning Forum prior to the release of the draft 18 Reg plan even though they were fully aware of the contents of the draft Neighbourhood Plan and aware that policies in the draft plan went completely against key policies in the Neighbourhood Plan.

The Council undertook a consultation exercise on their Green Belt review as part of this Local Plan process and consulted a number of interested parties. However, there was no consultation with the Hadley Wood Neighbourhood Planning Forum. The Council would have been aware that Site Allocation SA45 which they are proposing to release from the Green Belt for housing development was contrary to the draft neighbourhood plan, which didn't propose any amendment to the Green Belt boundary.

There is no evidence of any consultation with the London Borough of Barnet or Hertsmere, which is highly surprising, given there are policies in the draft plan that would have a huge impact on both Councils.

Both councils have green belt land that immediately adjoins Site SA45 and have undertaken their own green belts studies for their local plans. Hertsmere applied a wider-than-district approach and considered the site that includes SA45 to make a "Strong" contribution to the Green Belt and therefore recommended that the land should not be considered further for development. The Barnet green belt study for their local plan found that their green belt land to the west of Site SA45 scored 'strongly' (highest possible ranking) against four of the five Green Belt purposes and didn't think the site was appropriate to be released from the green belt.

Site SA45 sits directly adjacent to Monken Hadley Conservation Area in London Borough of Barnet, but the Council failed to identify in their assessments and therefore took no notice of it. This is in direct contravention of Step 1 in Historic England's Advice Note 3 "The Historic Environment and Site Allocations in Local Plan". If they failed to identify the correct heritage assets how can the Council have undertaken a proper heritage assessment. Moreover, if they had consulted with LB Barnet, they would have been told of their mistake and could have rectified it.

Hadley Wood residents have to rely for most of their key amenities & services from other local authorities than Enfield and therefore the Council should have consulted with LB Barnet and Hertsmere. For example,

- a. There are no walkable early year facilities for children aged under 2 in Hadley Wood. The nearest facility is a private facility in Monken Hadley, Barnet.

- b. As Hadley Wood primary school is full, the nearest primary school is located in the LB Barnet.
- c. There is no secondary school in Hadley Wood, The nearest school is located in Barnet.
- e. There is no sixth form college in Hadley Wood, the nearest facility is located in Barnet.
- f. There are no GP facilities in Hadley Wood. The nearest GP's are in Barnet and Potters Bar.
- g. The nearest hospital is in Barnet.
- h. The nearest NHS dental practices are in Barnet.
- i. The nearest library is in Barnet.
- j. The nearest gym is in Barnet.
- l. The nearest supermarket is in Barnet.
- m. the nearest post office, bank or pub are in Barnet.

There is no evidence to indicate that Enfield have consulted the neighbouring local authorities whose services would have to be used by new residents in Hadley Wood as these do not exist close to Hadley Wood or within any reasonable walking distance. Barnet Council are probably not even aware that by allocating Site SA45, Enfield Council are seeking to utilise Barnet's key public services and amenities for future Enfield residents, so they won't have to provide them themselves.

Green Belt

The Green Belt release which would be required to allocate the Site, (SA45), is not justified by a properly-evidenced 'exceptional circumstances' case. Without a fixed position on the amount of housing needing for the Plan period, there is no rational case that can be made for the release of land like Site SA45.

The entirety of Site SA45 is situated within the Green Belt and adjoins Green Belt in London Borough of Barnet and Hertsmere District. It is an 11-hectare site in the open countryside, currently in grazing use but that has as well been in agricultural use. The NPPF is clear that Green Belt boundaries should only be altered in "exceptional circumstances" (paragraph 140).

The Council's objectively assessed need for housing does not, by itself, automatically constitute "exceptional circumstances" that justify the release of SA45 for major development. The Council is required to take into account a number of other factors to ascertain whether "exceptional circumstances" exist to justify the release

of land. In the case of Site SA45 the lack of any detail on what the actual housing need is, means there is no 'exceptional circumstances' .

Neither the draft Local Plan nor the supporting documents acknowledge that the site is bordered by Green Belt land in both LB Barnet and Hertsmere District. Both rate the land as making a "Strong" contribution to the Green Belt and development of site SA45 would impact the neighbouring parcels. The Evidence Base does not contain a Statement of Common Ground between LB Enfield and neighbouring authorities, reflective of the failure to look strategically at the need for Green Belt release in this area through the proper operation of the Duty to Co-Operate. Without this it is difficult to see how one piece of green belt can be removed without assessing the harm and impact on the remainder of the green belt in that location.

Part of Site SA45 is in flood zone 3 and a Site of Borough Importance for Nature Conservation. This is unsuitable and unavailable for development and should not be released from Green Belt.

Enfield's Green Belt and MOL Study 2021 concludes that the site is one of the areas "that make the greatest contribution to the greatest number of Green Belt purposes" and that the harm that would be caused by the site's release from Green Belt would be "Very High" in table 8.1 of the study. This is the highest possible ranking, so would be the very last green belt site to be considered for release and development.

The Green Belt and MOL Study 2021 scores site SA45 as making "Strong" contribution to four of the five purposes of the Green Belt (this is the highest possible ranking). It scores Preventing neighbouring towns as merging into one another as "Moderate", but the accompanying text only refers to Potters Bar, whereas the much greater risk is a merging with Barnet, given the site immediately adjoins the London Borough of Barnet. The assessment undertaken of this score is therefore inaccurate.

LUC, the Council's consultant who produced the Green Belt and MOL Study, undertook a similar study for the London Borough of Barnet for their Local Plan in November 2018. Part of the Green Belt also covers the Monken Hadley Conservation Area, next to Site SA45. That Green Belt site also scored 'strongly' (highest possible ranking) against four of the five Green Belt purposes in the LB Barnet's Green Belt and Metropolitan Open Land Study – Stage 1 Final Report (2018).

Enfield's Characterisation Study (2011) explicitly refers to Site SA45 with: "Although a small area within the borough, this landscape character area is part of an important area of Green Belt and is in good condition. The Green Belt area is clearly defined by Bartram's Lane and the rear boundaries of properties on Camlet Way and Crescent West". The same Characterisation Study notes that the Farmland Valleys and Ridges landscape, which the site also falls under, "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" and "The existing Green Belt boundary should be retained and protected, and future development and land use changes resisted".

The field pattern has remained unchanged for centuries and the site is part of the Hornbeam Hills South Area of Special Character (this important designation is not

even mentioned in the Main Issues and Preferred Approaches Local Plan document).

It is evident to me that the Council have failed to protect Green Belt land, as required in the NPPF. In reaching its conclusion, the Local Plan justifies its approach to site allocations by stating that their preferred approach is set out in policy SS1, which proposes the provision of 25,000 new homes within the Borough in strategic locations with some release of the Green Belt due to the exceptional circumstances. This justification falls woefully short of the expectations set out in paragraph 136 of the NPPF, due to the lack of referenced evidence.

There is no evidence to justify the release of Site SA45 from the green belt.

Sustainability

The proposed allocation of Site SA45, Policy DM DE6 Tall Buildings and Policy DM H4 Small Sites and Housing Development all start from the false assumption that Hadley Wood is a sustainable location because it has a railway station. They ignore the actual PTAL rating of the location and just focus on the station.

Unfortunately, the opposite is true. Hadley Wood is an unsustainable location because the majority of key journeys to access key services have to be made by car. There is no other choice.

- Public transport links are poor, as reflected in the site's PTAL of 1a/b. The only bus route (399) travels from Hadley Wood station to Barnet, 2.3km away; there is no tube station; train services are limited, especially off-peak, with the next stop north being Potters Bar (Hertsmere) and the next stop south being New Barnet (LB Barnet). There is no train service to Enfield or Cockfosters.
- There are no easy walking routes – the only town centre reachable by foot is Barnet, which is a 40 minutes' walk from Hadley Wood station. Enfield town centre would be a 2 hour walk.
- Cycling in Hadley Wood is unrealistic because there are no cycle paths along the roads.
- There are no walkable early year facilities for children aged under 2 in Hadley Wood. The nearest facility is a private facility in Monken Hadley, Barnet.
- Based on GLA data, Site SA45 would increase demand for early years schooling by 61 spaces, which significantly exceeds the 10 spaces available "locally" (including LB Barnet).
- The single entry form local Hadley Wood primary school is already oversubscribed - 33 children were refused a place for the 2021 start and the school has a long waiting list across the different year groups.
- There are no secondary schools within walkable distance. The nearest non-religious co-educational comprehensive school is East Barnet School, 4.4km away (in LB Barnet) and which already had a deficit of 71 spaces.
- There are no sixth form colleges within walking distance of Hadley Wood. The nearest is in Barnet.
- There are no GP facilities within walkable distance. The nearest GP's are outside LB Enfield (Barnet and Potters Bar), who already operate below the recommended GP to patients benchmark.

- The nearest hospital, in Barnet, is an hour's journey away on public transport, and was rated as requiring improvement particularly in the areas of safety and responsiveness.
- There are no NHS dental practices within walkable distance. The three closest practices are all in Barnet.
- There are no libraries within walkable distance. The nearest library is a 40 minute walk away, in Barnet.
- There are no police stations near Hadley Wood. The police station serving Hadley Wood is in Edmonton, 11.4km away.
- There are no gyms within walkable distance (nearest is in Barnet).
- There is no supermarket within walking distance, the nearest one is in Barnet.
- There is no post office, bank or pub within walkable distance (the nearest ones are in Barnet).

All the above highlight that Site SA45 is not in a sustainable location and without a commensurate investment in improvement in amenities such as public transport, healthcare, schooling, shopping and leisure, does not represent sustainable development. As demonstrated above, just having a station does not represent a sustainable location. The assumption that the proximity to the railway station equates to good public transport accessibility fails to recognise the reality of suburban/semi-rural locations.

Strategic Policy SP T1 states that new developments will be required to be car-free, however, that is wholly unrealistic in a PTAL 1a/b location. The current level of infrastructure cannot cope with the addition of 160 new homes and the scheme would not warrant the level of investment needed to make a difference.

Hadley Wood not being a sustainable development location impacts not only the proposed large development on current Green Belt land, but also the proposed intensification elsewhere in Hadley Wood.

Policy DM H4 states that housing delivery and intensification on small sites will be particularly supported in the following locations:

- Sites with good public transport accessibility (PTAL 3-6);
- Sites within 800m of a station or a town centre;
- Sites with good local infrastructure; and
- Places with planned infrastructure improvements.

The above reflects the London Plan. However, that wording was not updated to reflect the consultations and discussions, which revolved around good public transport accessibility and within 800m of a station and good local infrastructure.

The oversight has resulted in a nonsensical situation, where proximity to a station is in itself deemed sufficient to allow intensification and development, even when there is only a train station that does not provide good local public transport accessibility and the absence of good local infrastructure renders a location unsuitable for sustainable development.

The unsustainability of Hadley Wood as a development location also arises where increased density is pursued through increased building heights. London Plan para 3.9.3 explicitly states that it is not automatically acceptable for any building to be up

to the height threshold for Tall Buildings and that buildings must not lead to unacceptable impacts on the area. The draft Local Plan does not make a similar statement, and policy SP DE1 should explicitly state that building heights must reflect the design and sustainability of the locality to ensure that the buildings do not lead to unacceptable impacts on the area.

These considerations also apply the small sites intensification (draft Policy DM H4).

More broadly, the Planning and Compulsory Purchase Act 2004 imposes a positive obligation on the Council to seek to achieve sustainable development in the new Local Plan. In the absence of any measures to improve infrastructure, services and amenities release of Site SA45 will not contribute towards the achievement of sustainable development, breaching NPPF paragraph 105.

I fully support good growth and good developments, however, a significant increase in the number of residents to Hadley Wood would add pressure on the very limited local amenities.

Climate Change

The NPPF provides that planning policies should minimise the impact on biodiversity and establish coherent ecological networks that are more resilient to current and future pressures. The NPPF also states that planning policies should allocate land with the least environmental or amenity value.

NPPF paragraph 179 requires Plans to safeguard wildlife-rich habitats and wider ecological networks. Site SA45 is important for biodiversity and as a wildlife corridor, as reflected in part being a designated site of local importance for Nature Conservation. The site should therefore be protected.

The site has been grassland for centuries and represents a valuable carbon sink. The first point of Enfield's Climate Change Action Plan refers to the importance of enhancing carbon sequestration. The proposal to destroy this valuable resource therefore breaches not only the NPPF and London Plan, but also the Council's own Climate Change Action Plan.

As indicated above, Hadley Wood is a car-dependent location and additional housing, both on site SA45 and by way of intensification as a result of the broader proposed policies, would add to private vehicle usage and congestion, and thus exacerbate air pollution in the Air Quality Management Area. The allocation and development of Site SA45 would also represent a failure to meet Climate Change objectives.

Heritage

The land that forms part of Site SA45 has been owned by the Sovereign since 1399.

Before the Battle of Barnet in 1471, the Yorkist army marched through the field and tore down the palisade surrounding the deer park in Enfield Chase. Lancastrian

cannonballs and arrows were fired in retaliation and these will still remain in the ground today, which is why the land is within an Area of Archaeological Importance.

By the Act of Disenchantment in 1777, George III divided his entitlement to Enfield Chase into plots for sale as agricultural leases. In 1882 the Duchy of Lancaster, converted the agricultural leases around the new railway station, in what became Hadley Wood, into building leases, leading to the construction of the houses in the Conservation Area in their current characteristic styles. The land west of Crescent West, including the proposed allocated site, was retained within an agricultural lease. After the building leases expired, the land around the station that had not been built on was sold by the Duchy of Lancaster to Enfield Council in 1944, facilitated by the Green Belt Act of 1938.

The agricultural lease identified in allocation SA45 is the only open land in Hadley Wood that remains in the freehold interest of the Duchy of Lancaster and was historically left as rough pasture to provide a green setting to all the properties backing onto it. It is clear to me that the land formed a series of field parcels, that remain consistent, providing evidence that the field boundaries surviving on the actual land today are a historic landscape feature. None of this seems to have been taken into account in allocating site SA45.

Site SA45 is located to the north of Camlet Way and Crescent West, immediately adjacent to the Monken Hadley Conservation Area (London Borough of Barnet) to the west and Hadley Wood Conservation Area to the east. Part of the site itself is within the Hadley Wood Conservation Area boundary. The properties at 83, 85 and 87 Camlet Way are all Grade II listed buildings and like my house, all back onto the site, whilst 83 and 85 will also immediately adjoin a new access point into the site.

The National Planning Policy Framework (NPPF 2021) sets out very clear guidance for plan-making, with reference to the historic environment. Paragraph 190 states that Local Plans should set out a positive strategy for the conservation of the historic environment that should take account of the desirability of sustaining and enhancing the significance of heritage assets.

Historic England's Advice Note 3 "The Historic Environment and Site Allocations in Local Plan" provides guidance of the process for allocating sites for development in Local Plans. This sets out a five-step process to follow:

STEP 1 Identify heritage assets affected

STEP 2 Understand the contribution the land makes to the significance of the heritage assets.

STEP 3 Identify the impact the land may have on that significance

STEP 4 Seek to maximise enhancements to avoid harm

STEP 5 Determine whether the proposed site allocation is appropriate for the NPPF test of soundness

Neither the draft Plan nor any of the supporting documents appear to acknowledge that the site borders the Monken Hadley Conservation Area, which is a fundamental failure to comply with Step 1. If you fail to identify the Heritage assets to be assessed, the entire assessment is flawed. If the Council had identified the correct Heritage Assets in the first place, they would not have allocated Site SA45.

The draft Plan does not contain the 'Appraisal matrices for the site options' that were included in the version that was presented to the Councillors at Cabinet. That states that the **"Site overlaps Hadley Wood Conservation Area and is within 500m of [four Grade II listed buildings] The site is located on the edge of Hadley Wood and its large-scale development could adversely affect the setting of these heritage assets"**. If you add another key Conservation Area within the green belt into the equation, even more harm would be created.

The key contributor to the significance of these designated heritage assets is their setting within the surrounding open countryside. Development of the Green Belt site or tall buildings overlooking the conservation area would heavily compromise the setting and therefore the significance of the designated assets.

There has to be harm to the special architectural and historic interest of the properties and both Conservation Areas that would neither preserve nor enhance their character or appearance.

A significant proportion of the Monken Hadley Conservation Area is open, rural and has been determined by the London Borough of Barnet to contribute to its special architectural and historic interest. Site SA45 shares these same attributes and contributes positively to its setting.

There is no convincing argument that developing on Site SA45 would sustain the significance of the listed buildings on Camlet Way. The open character of the site and its rural setting contributes positively to the significance of the heritage assets and any development would result in harm by virtue of the erosion of the rural character of the site and its replacement with a large housing estate.

Landscape

Site SA45 which is identified for Green Belt release in Hadley Wood is clearly identified on the draft Local Plan policies map as falling within an Area of Special Character.

Policy DM DE11: Landscape Design recognises the importance of "the quality, distinctiveness and the sensitivity of the Borough's areas of landscape character" and to "restore, conserve and enhance" such areas.

Policy DM RE1: Character of the Green Belt and Open Countryside is also relevant as it sets out the development criteria in respect of the impact of development on the landscape, Green Belt and open countryside, retaining features of landscape value and conserving the character of the landscape.

The NPPF also emphasises the importance of the landscape in paragraph 127 (c) and 170 (a). These policies are also reflected in the London Plan (Paragraph 8.11) which supports Policy G1: Green Infrastructure, requires boroughs to prepare green infrastructure plans that support landscape and heritage conservation. Policy HC1: Heritage Conservation and Growth, recognises the value of landscape to quality of life and sense of place. It notes that, in consultation with organisations, including local communities, evidence that helps understand the value of the historic environment, and that this can be used to conserve and enhance such environments, access to and interpretation of assets, landscapes and archaeology.

Site SA45 is actually designated as an Area of Special Landscape Character as recently as 2013 through production of the Enfield Core Strategy. The findings and recommendations of the 'Enfield Area of Special Character Boundary Review' prepared in support of the Core Strategy remain relevant, with no change having taken place in the intervening period that would justify any 'de-designation'.

The 2013 Boundary Review recommended that the Areas of Special Character in Enfield be extended to include Hornbeam Hills South, reflecting its role and contribution to the wider landscape character area for Southern Hertfordshire. This acknowledges that much of the area is outside Hertfordshire and covers land south east of Potters Bar and north of Hadley Wood. The recommendation is reflected in Core Strategy Policy DMD 84, to read alongside Core Policies 30, 31 and 33.

The assessment of the Southern Hertfordshire Landscape Character area and the Hornbeam Hills area makes note of the historical and cultural influences important to the wider Hornbeam Hills landscape. It mentions the historical importance of the geometric field patterns, which were created following the parliamentary enclosure of the former Chase in the late 18th century, as well as acknowledging the rarity and distinctiveness of the landscape in this part of the country, which is still intact and which the assessment notes "is partly what gives the area such a distinctive character", and which "is an unusual landscape type for the county".

Furthermore, the assessment notes that "the area is widely visible from the perimeter fringes and within the area from local roads. This is a large-scale coherent landscape with an open feel". It recommends that the landscape character area is 'improved and conserved'.

Policy DMD 84 notes that new development within Areas of Special Character will only be permitted if features or characteristics which are key to maintaining the quality of the area are preserved and enhanced. The key features and characteristics of the Hornbeam Hills South area are its strong undulating arable hills with geometric patterned large fields. Any development on the site would undoubtedly see the loss of the iconic geometric fields, as well as more generally impacting upon the large-scale coherent landscape which boasts an open feel.

This is reinforced by the Enfield Characterisation Study, which analyses the borough's overall pattern and evolution, drawing out key characteristics. The study makes specific reference to the iconic geometric fields that make up the proposed allocation site. It suggests that preserving these fields is important as they serve as good examples of 18th/19th century enclosed landscapes.

Furthermore, the Enfield Area of Special Character Boundary Review also notes how the character area is part of a significant Green Belt which performs an important role in retaining the separate identities of Potters Bar and Hadley Wood. The value and importance of this is further highlighted in the Hadley Wood Wood Heritage and Character Assessment, prepared by Aecom in 2018 in support of the draft Hadley Wood Neighbourhood Plan. In particular, the Aecom report highlights the value of Hadley Wood's surrounding semi-natural and agricultural character which acts as a buffer, separating it from other urban areas. If any development were to occur on the site it would undermine the importance placed on this separation and could serve to encourage further development that similarly closed the gap between Hadley Wood and other urban areas.

The Aecom report goes on to highlight the aesthetic value of the views from Hadley Wood, particularly those with a verdant backdrop that are visible across the area. It specifically refers to those views visible from the higher ground along Camlet Way and the roads descending into the valleys of Monken Mead. The report advises that this aspect of Hadley Wood should be sustained, reinforced or enhanced. Development on the site proposed for allocation in the draft Local Plan would not meet these objectives.

The location of the proposed allocation means that any development would neither sustain, reinforce or enhance these characteristics. Moreover, the draft Hadley Wood Neighbourhood reinforces the point that the surrounding farmland and mature woodland are treasured by the local community and deserve continued protection. The draft Neighbourhood Plan notes that the proposed allocation area is an important space and suggests that it be designated as a Local Green Space, meeting the criteria established in the NPPF for such designation. The draft Neighbourhood Plan notes that the site provides an invaluable area for recreation and wildlife, as well acting as flood protection against the Monken Mead Brook.

If development is allowed to occur on this vital piece of open space, Hadley Wood would be losing a major part of its local character. It is vital the Local Plan reflects the views and evidence prepared to inform the emerging Neighbourhood Plan and for this to occur the Council must retain site SA45 within the green belt to protect this valuable landscape asset.

Housing Numbers

The NPPF seeks to ensure that a sufficient supply of homes is delivered and Para 68 addresses how land for homes should be identified. Paragraph 119 of the NPPF requires "planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.

The recently adopted London Plan (2021) ascribed Enfield with a ten-year housing target (net housing completions) of 12,460 homes over the period 2019/20 to 2028/29.

Policy H1 of the London Plan details how London boroughs can achieve their respective ten-year housing targets by

"allocating an appropriate range and number of sites that are suitable for residential mixed-use development and intensification"; "encouraging development on other

appropriate windfall sites not identified in Development Plans” and “Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:

a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary

b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets

c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses

d) the redevelopment of surplus utilities and public sector owned sites

e) small sites

f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London’s economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.”

Quite rightly, this policy recommends that boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for building new homes.

With regards to other sources of supply, clause (A) of Policy H9 (Ensuring the Best Use of Stock) of the London Plan states that “boroughs should promote efficient use of existing housing stock to reduce the number of vacant and under-occupied dwellings”.

There are currently circa 3,000 vacant residential properties in the London Borough of Enfield. This equates to 12% of the supposed 25,000 housing need and if just 160 of these vacant homes could be brought back into use, then there would be no requirement to build 160 homes on the green belt in Hadley Wood. The Council should be promoting policies to get these 3,000 vacant homes back into use and counting these homes within their housing supply figures as these homes should all be capable of being brought back into use within a 5 year period.

The council is still to agree how many dwellings are needed for their Local Plan period. The Plan documents discuss a very wide range of potential need, ranging from 1,246 dwellings per annum in the London Plan 2020 to 4,397dpa according to the Standard Methodology as set out in the NPPG, with the White Paper adding more uncertainty.

The draft Local Plan was prepared both before and during the Covid 19 pandemic and therefore does not consider the changes to working practices or population shift that has occurred and will continue to occur. Likewise, the full impact of Brexit is still to be established. London has seen a reduction in its population which must have fed through to Enfield as well.

The projected requirement for 25,000 new homes assumes a population growth in excess of the national projections and therefore given Brexit & Covid 19, the 25,000 figure must now be seen to be too high and needs to be re-assessed.

In the absence of an accurate housing needs figure and any justifiable local housing need, of which there is no such figure for Enfield at present, the draft Local Plan strategy of removing Green Belt land is not justified and does not align with paragraph 137 of the NPPF and Policy G2 (London's Green Belt) of the London Plan.

Linked to this, The council has failed in their duty to objectively assess all sources of housing supply, as alternative sources of supply such as brownfield SIL sites have not been assessed and phasing of development at Meridian Water extends beyond the Plan period when instead, the Council could, and should, be facilitating delivery of this strategic site: a flagship scheme that has been in planning and development for well over a decade, but where delivery has been slow. Development here should be expediated, rather than releasing Green Belt sites.

The above also demonstrates that the Local Plan conflicts with the London Plan, which states that "boroughs proposing changes through a Local Plan to Green Belt or MOL boundaries (in line with Policy G2 London's Green Belt and Policy G3 Metropolitan Open Land) to accommodate their London Plan housing target should demonstrate that they have made as much use as possible of suitable brownfield sites and underutilised land, including – in exceptional circumstances – appropriate industrial land in active employment use. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged." As such, it is evident that LB Enfield Council has failed to demonstrate how all alternative sources of supply have been considered.

The Council is a significant landowner in the borough and has failed to consider its own sites in the assessment. Why the Council would exclude its landholdings is strange to say the least, but by doing so it has failed to objectively assess all sources of supply.

Conclusion

Given all the above, I do not believe there is any justification for the release of site SA45 from the green belt in Hadley Wood, nor justification for the intensification on small sites or tall buildings within an 800m radius of the Hadley Wood station.

Yours faithfully