

To whom it may concern,

My name is Nick Cockburn and I live at 105B Camlet Way, Hadley Wood, EN4 0NJ. My property and associated land lies adjacent to and borders Site SA45 as identified in the Enfield Draft Local Plan. I am a member of the Hadley Wood Neighbourhood Planning Forum Committee and have a professional interest in planning, development and the built environment.

I do not seek to comment on the entirety of the Draft Local Plan, but instead focus on two aspects, namely, Green Belt release and intensification areas.

### **Green Belt Release**

From the consultation documents available it is wholly unclear as to how all options for future housing delivery (other than by the release of Green Belt) have been adequately and sufficiently assessed following the sequential tests detailed within local and national planning policy. It is also unclear whether or not the local authority have included an uplift in delivery numbers on brownfield and small sites throughout the borough as a result of the proposed change in density/intensification policies contained within the draft local plan.

In contemplating the release of Green Belt a planning authority must demonstrate exceptional circumstances for the release of each site, and indeed, the entire area of each individual site. I do not believe that this benchmark has been achieved for the release of the various Green Belt sites in question, but in particular site SA45, for which the Council identifies the level of harm to the Green Belt of release of this site as being 'very high' (*Green Belt and Metropolitan Open Land Study*; June 2021).

National planning policy mandates that where the release of sites in the green belt are proposed by a local planning authority, that these sites are in sustainable locations. By all objective analysis, site SA45 cannot be considered to be a sustainable location, and the analysis presented by the Hadley Wood Association (HWA) objection clearly demonstrates this. Whilst housing need, if demonstrated, is often accepted by Inspectors as an exceptional circumstance, housing in an unsustainable location will likely fail at examination, in the absence of other significant factors.

I note that site SA45 was not originally considered for release in Enfield's 'Local Plan Issues and Options' 2018 document. However, it would appear that the site was included some time after the receipt of an email from Neil Hall on behalf of the landowner, the Duchy of Lancaster, on 27<sup>th</sup> February 2019, in which the landowner appears to rely almost exclusively on the site's proximity to the Hadley Wood railway station to promote the site with no attempt to analyse the sustainability of the site in real terms, or indeed the impact of releasing the site from the green belt on local landscape, heritage, ecology or environmental impact amongst other issues. It is further noted that the local authority have also not undertaken a detailed analysis of the impacts of release of SA45, and therefore as it stands at present, any decision to release SA45 from the green belt might expose the local authority to a judicial review.

### **Intensification Areas**

The Draft Plan's approach to intensification areas, which simply seeks to draw a circle representing a distance of 800m from a station or edge of town centre is overly simplistic and inappropriate. Such an approach fails to examine the sustainability of such sites, and thereby fails to properly assess the site's suitability as an area for intensification. There are multiple cases of local authorities adopting a more nuanced and pragmatic approach to identifying areas suitable for intensification (eg LB Bromley).

Policies in the draft plan that look to contextually and holistically improve, connect, diversify and where appropriate intensify neighbourhoods would be a much more appropriate policy approach than using crude 800m circles as proposed at the moment.

Further, I fully support the HWA's objection to various elements of the Enfield Draft Local Plan.