

From:
To: [LocalPlan](#)
Cc:
Subject: Draft Local Plan: Site SA45 - HADLEY WOOD ASSOCIATION: Part 1 : Consultation
Date: 13 September 2021 22:51:46

Hadley Wood Association (HWA or the Association) hereby provides its response to the Draft Local Plan in several Parts, reflecting its several but overlapping roles as the local charitable members' resident organisation (familiar to LBE):

(A) to promote and protect our local community, its character and amenity - PART 2

(B) to manage our substantial open spaces and Centre (under long lease from LBE) to provide enjoyment, recreation and education facilities - PART 3

(C) to coordinate with local organisations and manage planning and other issues - PARTS 1 and 4.

This PART 1 concerns the Consultation Process, and in particular seeks an early meeting. PART 4 will summarise the relevant organisation responses and (about 1,000) individual objections, for the mutual convenience of planners and community. In the nature of the exercise, this will be completed and sent after the expiry of the normal consultation period as the responses and objections are continuing up the last minute.

We request that you forward to us, as soon as practical, the response received from Duchy of Lancaster.

PART 1: CONSULTATION PROCESS

1. HWA seeks an early meeting with the Planning team within the scope of continuing Reg 18 consultation.
2. The vital reason is to discuss the proposed de-designation of Site SA45 from Green Belt for a residential development of 160 units by Duchy of Lancaster. We believe there are very good reasons to accept now that this singular proposal (which affects nothing else in DLP) must be changed, and save everyone (especially planners) much further work and (especially residents) continuing distress. We can then focus on other aspects of the DLP, including many positive policies, through the NPF process.
3. This part of the plan SA45 (and related proposals for intensification around the station, despite being unsustainable with PTAL 1 level, and largely Conservation Area and open space land) has caused a storm of resident opposition AND produced an overwhelming Planning case by way of objection from the HW Neighbourhood Planning Forum (NPF).
4. This Site was excluded from the previous draft plan. It appears to have come into the second draft simply because the landowner (Duchy of Lancaster or DOL) urged LBE to include it, giving some implausible reasons ("this green Belt is not valuable, better for development than Crews Hill, near a station"). As appears from the DLP documents, there has not yet been any serious assessment by LBE of the value of this green belt, its heritage or the sustainability for development. The NPF demonstrate that, on any proper assessment, there are no exceptional reasons here, on the contrary the case for enhanced protection of this green belt is clear.
5. It can never be established that there is a sufficiently strong and precise need for just 160 new homes on the Western edge of the borough with building starting in over ten years time, to amount to exceptional reasons to justify the irretrievable loss of our green environment - contrary to primary planning requirements, green environment and climate change policy.
6. This cannot be an available site. Planning permission could never be given. A housing estate on these meadows will be substantial harm to the Conservation Area, with no exceptional reasons to allow development. The duty is to enhance not destroy.
6. The prior consultation history for SA45 is very unsatisfactory; proper and timely consultation would have saved all the trouble by pointing out several key reasons against development. DOL did consult HWNPF/HWA when first responding to the call for sites; we told them that the development was contrary to the Draft Neighbourhood Plan, Planning policy and resident views. When we raised the subject with LBE, we were told

that we did not need to be concerned; correctly, it was not included in the first draft DLP. We also expressed reasoned opposition in the SHLAA consultation.

7. The inclusion of the site in the second draft DLP was a complete surprise. DOL did not consult us about their plea to have it included in the second draft. LBE never consulted the NPF or HWA or HWCASG about the change.

8. You will understand why we think that an early discussion on this specific proposal will be worthwhile.

9. We have general concerns about this Consultation. The huge document is unclear and contradictory. It has not been possible to explain the range and complexity to residents. Healthy sounding policy is part of DLP but then ignored on specific proposals (green belt, intensification, tall buildings). The healthy policies applied to Hadley Wood dictate enhancement of green belt and heritage assets, not destruction. How can we sensibly respond to this confusion and contradiction?

10. In practice, all the focus of residents has been on the irretrievable green damage and SA45 (with 1,000 objections). We trust that this demonstration of the community is effective and will be listened to on that specific draft policy, but the effort required means that little attention has been possible for other elements of the DLP although they are very important for us as well. We ask for a further opportunity to respond, when SA45 has been dealt with.

This HWA email sent from a personal email (Robert Wilson) as HWA office outgoing emails have a gremlin today.

This and other Parts of HWA Response can be consolidated and re-presented in due course.

Sent from my iPhone