

From: Neil Hall
To: [LocalPlan](#)
Subject: New Enfield Plan – Comments by the Duchy of Lancaster
Date: 27 February 2019 17:36:38

Please find below our comments and observations on the emerging Plan.

We would welcome the opportunity to discuss our land adjacent to Hadley Wood Station as a sustainable release from the Green Belt. This land has already been submitted to the call for sites process.

Section 2 - Promoting Good Growth Options

General Comments

The Duchy considers that a hybrid approach to meeting the challenging growth requirements is required. To provide a range of housing opportunities, minimise the need to travel and provide new homes in a range of locations it is considered that the benefits of each option should be maximised.

We would particularly support growth focussed around Town Centres and all Stations, and Plan Led Green Belt Review. The two strategic options are in any event inter linked and the need to provide access to rail transport could form part of the exceptional circumstances for altering Green Belt boundaries. Locations and opportunities should be maximised around transport interchanges to encourage modes other than the car, especially those with rail access and complementary local services such as schools, jobs and retail opportunities.

Some areas of Green belt will be extremely sensitive and will need protecting. However, other areas on the urban fringe may lend themselves to sensitively designed development as 'infill' or 'rounding off' without harming the overall strategic purpose in that location. They have often been protected for many years despite their being no public access or use, and therefore restricting the delivery of homes and in practice offering few community benefits.

It is recognised that a balance will need to be struck to also encourage renewal of existing urban areas, but if planned in a balanced fashion these objectives need not conflict with each other. A wider range of locations for housing is essential to help accelerate housing delivery and provide a wider spread of market and affordable homes across the Borough, and not just in the east.

The new plan should be informed by a comprehensive Green Belt review to identify suitable opportunities for sustainable development across the whole Borough and around all stations.

Figure 2.2 Growth Options Diagram

Figure 2.2 should be amended to identify the area around Hadley Wood Station as a potential area for growth and for Green Belt Review. There is no justification why the area around Hadley Wood Station should be excluded from consideration under the spatial options. The Duchy has put forward a suitable 11ha site adjacent to the Station into the call for sites process. This should be considered.

It is also noted that Figure 2.2 does not accord with growth Objective 1 at 2.6.2 which recognises the need focus development around all stations as part of a

sustainable development strategy.

2.8 Town Centres and Areas Around Stations

This spatial option recognises the advantage of being within 800m of a rail station. These sustainability advantages can be part of the exceptional circumstances for Green Belt review. The Duchy supports this option provided it includes the consideration of land around Hadley Wood Station. This could be a missed opportunity and is one of the few options for growth in the north western part of the Plan area. The Duchy has submitted a suitable site adjacent to the station to the call for sites process.

The Town Centres and Areas Around Stations option should include land around Hadley Wood Station in accordance with Objective 1. Duchy land at Camlet Way should be considered as a sustainable site.

2.12 Strategic Plan-Led Review of the Green Belt

The Duchy supports the review of Green Belt boundaries especially where this would help deliver sustainable development around established transport hubs. It is considered that this can be part of the NPPF exceptional circumstances test and accords with the approach at NPPF138.

However, we are extremely concerned that this option is to be limited to the Crews Hill area as set out at 2.12.2 when other sustainable options are available at Hadley Wood, and potentially elsewhere. The exercise appears to be pre-determined rather than based on an objective process that casts the net wide and considers all options that benefit from rail access.

Large scale growth at Crews Hill will require major infrastructure investment and land assembly. There are few existing services or facilities. Growth is likely to result in the sprawl of Enfield north to the M25 further fracturing the Green Belt in this location and significantly narrowing the gap with Cuffley. If proposed at a smaller scale it is likely to be unsustainable and divorced from key facilities.

It is therefore not clear why the Crews Hill option is stated at 2.12.2 to perform better than say selective release around existing settlements, and especially at places like Hadley Wood. Such smaller options could result in rounding off and infill, avoiding the need for major Green Belt incursions. They have the benefit of existing infrastructure making them easier to deliver and more likely to meet affordable housing requirements. These factors must also be considered in the appraisal of such growth options.

The Green Belt assessment must be fine grained and detailed enough to consider a wide range of options. Releasing several smaller sites on the urban edge and at Hadley Wood must be tested as an alternative to the Crews Hill area. It is not clear why this area is being favoured or why it is it has the greatest potential as the Plan states.

The Duchy supports the review of Green Belt boundaries provided it considers land around all stations and smaller site options, such as land at Hadley Wood Station, as a reasonable alternative to Crews Hill. The review should be combined with other spatial options and with the focus for growth around rail hubs to maximise the benefits.

Neil Hall
Planning and Development

Office tel - 0207 269 1700 Office fax - 0207 269 1710



DUCHY of LANCASTER
1 Lancaster Place, Strand, London WC2E 7ED