

COMMENTS ON THE DRAFT SHLAA METHODOLOGY

To Whom It May Concern

I am responding on behalf of Enfield RoadWatch and our large supporter base to the current consultation on the SHLAA methodology which runs until 5pm October 29. We have a number of general and specific comments to make.

1. The consultation covers important issues and has not been adequately publicised nor does it run long enough for residents to become aware of it and respond in numbers.
2. We note that much of the content is standard wording taken from official documents. However, we also note that there is much discretionary wording that causes me concern.
3. **p9 2:12** The document lists the constraints that would totally exclude sites from consideration. It does **not** include Green Belt/MOL, which we believe it should. We trust this was an oversight on behalf of the authors as the NPPF still contains strong protection for the Green Belt/MOL as does the new London Plan in Section G2.

Table 2: Constraints on basis of which sites to be excluded

Level 1 – Sites to be excluded

- Sites within the functional floodplain (Flood Zone 3b)
- Special Areas of Conservation (SAC)
- Sites of special scientific interest (SSSI)
- Special Protection Area (SPA)
- Ramsar sites
- National Nature Reserves (NNR)
- Ancient Woodland
- Suitable Alternative Natural Greenspace (SANG)
- Notified Safety Zones (gas, aerodromes etc)
- Site of Importance for Nature Conservation (SINC)
- Grade 1 and 2 agricultural land

4. This same section includes only Grade 1 and 2 agricultural land, which is rather disingenuous because there is none in the southeast, except in Kent, and all the agricultural land around London is Grade 3. Grade 3 land is productive and should be valued for food security, environmental benefits, employment opportunities and other factors. As the ALC system is now outdated, we suggest evaluating the land in a more appropriate way that considers its organic structure, bio-life and other environmental factors.
5. **p11 2:18** In 2019 Enfield RoadWatch, The Enfield Society and CPRE-London did an extensive survey of potential brownfield/ previously-developed sites in the borough, which was shared with Planning and the Council. *Space to Build, Enfield*, demonstrated that there is potential room for up to 35,000 new homes without encroaching on Green Belt or MOL. Para 2:18 seems to indicate that none of those sites will be included unless they were also submitted by a landowner, developer or site promoter.

2.18 Where sites are submitted or suggested for assessment by a third party that is not the owner, developer or site promoter the methodology aims to establish such sites' availability by further investigation and evidence gathering whilst having regard to the government guidance's on **taking a thorough but proportionate approach. These would be sites that were either included as part of**

the call for sites exercise or included as part of London SHLAA 2017 where the availability was not assessed.

However NPPF guidance from 2019 requires that Local Authorities do a thorough desktop survey of all potential sites. LBE seems to be choosing not to follow this requirement, even though most of the work has already been done. *NPPF - It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area.*

6. **p12 2:22** This section is gravely concerning for its apparent self-permissioning to develop any sort of land in the borough, whatever its designation and protections. Taking the section on **Green Belt/ MOL** first.

Green Belt/MOL: Sites where the Green Belt assessment suggests land makes a lower contribution to the purposes of Green Belt will generally be deemed potentially suitable with regards to this factor. Sites where analysis suggests the land makes an important contribution to the purposes of Green Belt will generally be deemed unsuitable. Exceptions might occur for sites which are previously developed, where there are specific industrial requirements, where development would support community aspirations or where there are specific sustainability benefits.

While the Government guidance encourages a comprehensive consideration of the borough's land assets, it does not encourage Local Authorities to look for reasons to de-designate Green Belt or MOL. I refer you back to the Mayor of London's letter of February 2019 where he reiterated that a Green Belt review is not necessary. However, it appears that such an assessment is being undertaken anyway and that it is the type of assessment which will grade the borough's Green Belt and MOL. Even deeming that certain tracts of land make a 'lower contribution to Green Belt/MOL' does not make them 'potentially suitable' for development. This is in direct contradiction to National and London planning policy. All Green Belt and MOL sites should be excluded from consideration.

Similarly the sections regarding **Public Open Spaces and Local Green Space** are worded in a way to allow them to be opened up for development. Who provides the evidence and sets the policy to say that a public open space is no longer needed? What does it mean that 'development is linked to the use of the [local green] space? These public assets need to be protected not allowed to slip away with vague verbiage.

As noted above, we believe that **Agricultural Land** should be protected and utilised for food-growing, energy, climate change remediation and public health and welfare. By protecting only Grade 1 and 2 land, which does not exist in Enfield, the wording of the methodology combined with the apparent attack on the Green Belt, could result in the loss of all Enfield's farmland. No agricultural land should be considered suitable for development.

Historic Parks and Gardens, Scheduled Ancient Monuments and Allotments should also be removed from consideration and vague wording such as 'where development is linked to the use of the area' taken out of the document.

Overall the draft methodology appears to be an attempt to give the Council – and developers – a way to wriggle through the loopholes in the national and regional guidelines. We trust that the final version of the methodology will not contain the worrying wording discussed above.

Sincerely [etc.etc.]