

Proposed Submission Development Management Document

Consultation Statement

(March 2013)

**PROPOSED SUBMISSION
DEVELOPMENT MANAGEMENT DOCUMENT**

CONSULTATION STATEMENT

**THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)
(ENGLAND) REGULATIONS 2012**

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1 Introduction

- 3.1 A Development Management Document (DMD) is being produced to provide detailed criteria and standard based policies for assessing planning applications. The DMD is a borough wide document and will apply to all planning applications from home extensions to large scale applications for residential, commercial and mixed use development. Once adopted it will be used alongside the London Plan and other Local Plan documents, including the adopted Core Strategy (2010), to inform new development in the borough.
- 3.2 This statement sets out details on the consultation undertaken during the preparation of the Development Management Document (DMD), as required by regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012 (hereafter referred to as “2012 regulations”). A Draft DMD was published for consultation in compliance with Regulation 18 from 8th May until the 3rd August 2012.
- 3.3 All of the consultation responses received on the Draft DMD have been considered as part of the preparation of the Final version of the document, the Proposed Submission DMD; further details on this document are provided in section 3 of this document. In accordance with regulation 19 of the 2012 regulations, this Consultation Statement has been produced as part of the DMD Proposed Submission Documents.

2 Draft Development Management Document

- 2.1 The Draft Development Management Document (Draft DMD) included a range of draft policies with associated guidance on their implementation and a justification for the proposed approach. As mentioned above, it was published for consultation for 12 weeks last Summer.

Bodies and persons consulted

- 2.2 In line with the requirements of Regulation 18 of the 2012 regulations, ‘specific’ and ‘general’ consultation bodies were consulted on the Draft DMD, including:

Environment Agency
English Heritage
Enfield Primary Care Trust
Highways Agency
Natural England
National Grid
Network Rail
NHS North London
London Borough of Barnet
London Borough of Haringey
Inland Waterways organisation
British Waterways – London region
Telecommunication, gas and electricity suppliers.

- 2.3 All contacts on Council's Local Plan database, which covers a range of organisations and individuals or 'other' consultees, were notified of the consultation on the Draft DMD. Approximately 1500 individuals and organisations were notified, including specific, general and other consultees, and internal officers and councillors.

Duty to Co-operate

- 2.4 The 2011 Localism Act introduced a 'duty to co-operate' which places a formal duty on local planning authorities to co-operate with other local planning authorities, County Councils and other specified bodies or persons, including statutory agencies. The DMD provides criteria and standard based policies for assessing planning applications in Enfield and does not deal with strategic planning matters, which are already addressed through the Core Strategy. However, the Council has ensured that consultation with relevant bodies, including neighbouring authorities, has been continuous throughout the process of preparing the DMD. Meetings have been held to ensure that the duty has been met.

How bodies and persons were consulted

- 2.5 The Draft DMD was made available online, and paper copies were available at all Council libraries and at the Civic Centre.
- 2.6 The document was published on the Council's website (www.enfield.gov.uk/dmd) as a pdf document and via online consultation web pages powered by Objective software (<http://consult.enfield.gov.uk/portal>).
- 2.7 Emails and letters were sent out to all of the specific, general and other consultees on the Local Plan database informing them of the scope of the document, with a link to a copy of the document online and the deadline by which comments had to be submitted. Consultees were also informed of ways of submitting comments which included using the Objective online consultation software.
- 2.8 Meetings were held with representatives of local community and voluntary groups, including the following:
- Voluntary Sector Strategy Group
 - Enfield Racial Equality Council
 - One to One Enfield
 - Enfield Strategic Partnership and the Housing thematic sub group known as the Strategic Housing Forum
 - Borough Area Partnerships (South West, North East, Enfield Leaside)
 - Green Belt Forum
 - Over 50's Forum
- 2.9 A press notice was published in the Enfield Independent on Wednesday 23rd May 2012 and an article was published in April/May edition of the Our Enfield magazine which is circulated to all households in the borough. A full list of events are recorded in Appendix B.

Summary of main issues raised and how they have been addressed

- 2.10 Representations were received from a total of 66 organisations and individuals, including local residents, voluntary and community groups, developers and statutory bodies, during the consultation period. Feedback from the meeting with community and voluntary groups has also been recorded.
- 2.11 The following information provides a list of the main issues raised by the representations and feedback received; and how the Council has sought to address them in the Proposed Submission DMD. A summary of all the written representations received during the consultation period and the Council's response to each of these is provided separately in Appendix E.

Main Issue 1: The need for additional flexibility

Representations received raised issues in relation to flexibility. Respondents considered that policies, particularly those within Chapter 2: Sustainable Development; Chapter 3: Housing; and Chapter 9: Tackling Climate Change, need to provide additional flexibility to take account of exceptional circumstances, financial viability and technical feasibility.

Proposed Submission Response:

Summary of change: Document amended

The DMD, was amended to provide sufficient flexibility with regards to feasibility and viability issues. Exceptional circumstances are specific to individual sites and are therefore not referred to in the policy. However, some minor changes have been made to policies and supporting text to clarify their application.

The standards set out are in accordance with the requirements set out in the adopted London Plan, and have been subject to a separate assessment of viability (please refer to Enfield's Viability Assessment to support the Community Infrastructure Levy and Proposed Submission DMD 2013).

Main Issue 2: Additional policies required

Respondents considered that the DMD should include additional policies to address the following matters: housing for older people, the Lee Valley Regional Park, telecommunications, and waste water and water supply infrastructure.

Proposed Submission Response:

Summary of change: No change

Housing for older people: Housing policies in the DMD seek to address all housing needs, including the needs of older people. These policies support a range of housing accommodation suitable for older people including mainstream (with the potential for adaptation), affordable, and finally, specialist housing for those who need different levels of care and support.

The Housing policies do not prohibit or restrict developers from providing housing dedicated to meeting the needs of older people where it can be demonstrated that development meets relevant criteria. However additional supporting text has been added to recognise that a degree of flexibility may be required when assessing these schemes.

Lee Valley Regional Park (LVRP): The policy objectives suggested as part of a new LVRP policy are already covered by the Core Strategy Policies 11, 12, 35, 41, 44, 75, 78, and more detailed site specific proposals can be considered as part of the Central Leaside Area Action Plan and Ponders End Waterfront Supplementary Planning Document.

Telecommunications: The National Planning Policy Framework (NPPF) includes detailed policy guidance on supporting high quality communications infrastructure, including telecommunications. The London Plan also contains a policy to support the provision of telecommunication infrastructure. The Council will also consider this as part of its local plan review of the Core Strategy.

Waste water and water supply: The adopted Core Strategy already has a policy (Core Policy 21) to ensure that water supply, sewerage and drainage infrastructure is in place in tandem with development. Therefore, another policy in the DMD specifying this is not considered necessary.

Main Issue 3: Needs to better reflect the National Planning Policy Framework (NPPF)

Representations received raised areas where the document could be improved to better comply with the NPPF, particularly with regards to the exceptions within the Green Belt, the need for more detail in the Heritage policies, and the sequential approach outlined in the retail policies.

Proposed Submission Response:

Green Belt:

Summary of change: Document amended.

For the purposes of clarification, the supporting text has been amended to reference the NPPF and the list of all the exceptions to inappropriate development in the green belt.

Heritage:

Summary of change: Document amended

Text amended to clarify that default position must be to conserve and enhance heritage assets, with strong justification needed in all cases where this is not achieved.

Retail:

Summary of change: No change.

The DMD is considered to be in conformity with the NPPF, by focusing growth and development in existing town centres and advocating a sequential approach.

Main Issue 4: Affordable Housing policy is overly restrictive

Two respondents were concerned with how the DMD deals with the Affordable Rent Tenure, and considered that the approach taken was overly restrictive.

Proposed Submission Response:

Summary of change: Document amended.

The DMD policy on Affordable Housing on Sites Capable of Providing 10 or more units and the supporting text in the Housing chapter have been amended. Some of the more detailed information on the Affordable Rent Tenure (ART) has been removed because it was recognised that some of this was too detailed. Changes have also been made to ensure conformity with anticipated changes to the London Plan. The key considerations in terms of ART remain, particularly the need to provide affordable family homes.

Further discussions were held with one of the respondents on this issue, the GLA, on 31st January and 14th February 2013.

Main Issue: 5: Presumption against development of garden land should be removed from policy.

There was an objection to the proposed presumption against the development of garden land. It is considered unjustified and unnecessary and suggested that this policy will also have unintended economic effects on the Borough and London in general.

Proposed Submission Response:

Summary of change: No change.

The importance of the residential perimeter block structure, as the prevailing urban form of residential development in the borough, is such that the Council will seek to ensure that this character is protected.

For the principle of the development of garden land to be acceptable proposals must demonstrate that it can provide high quality residential development and that the remaining amenity/garden space will be high quality and able to perform a number of roles in order to compensate for a loss in the overall quantity of this space.

Main Issue 5: Economy policies are too restrictive

Respondents considered that policies should offer flexibility for a range of employment use classes within Strategic Industrial Land. Concerns were raised that the DMD seeks to protect too much land for traditional employment purposes. One respondent criticised the Council's employment evidence base.

Proposed Submission Response:

Summary of change: No change.

The policies are consistent with the Core Strategy and London Plan and refer to industrial type uses. Employment policies are supported by an independent and up to date Employment Land Review (2012) and it is considered that the outcomes of the review are robust.

Main Issue 6: Need a more positive strategy towards tall buildings

Concern raised that the policy wording falls short of providing a positive strategy to the management of tall buildings. One respondent (English Heritage) suggested that the tall buildings policy should be accompanied by a map showing where such buildings may be inappropriate, appropriate or sensitive. It was also suggested that the policy needs to include more detail on those areas where tall building will be supported.

Proposed Submission Response:

Summary of change: No change

The Council's view is that it is not possible to create maps covering all of the criteria within the policy on tall buildings, therefore composite maps would give a false indication of precision, still necessitating a criteria-based policy to be developed.

Further discussions were held with the respondent, English Heritage, on the 8th January 2013.

Main Issue 7: Proposed changes to the Policies Map

Several respondents raised the following issues with proposed changes to the Policies Map:

1. Green Belt: the removal or continued inclusion of particular sites in the green belt and the strategic implications of any Green Belt losses.
2. Changes to Metropolitan Open Land (MOL), and local open space, particularly around school sites.
3. Amendments to the Area of Special Character in the vicinity of Waggon Road and Enfield Road.
4. Objection to the inclusion of Woodcroft Wildspace as a Local Site of Importance for Nature Conservation

5. The need to define a Primary Shopping Area for Enfield Town.

Proposed Submission Response:

1. Green Belt: No change. A detailed explanation is provided in the evidence base: Detailed Green Belt Boundary Review (2013) and Appendix E.

2. Metropolitan Open Land (MOL) and open space: Some amendments have been made. Please refer to the evidence base: Open Space Policies Map Review (2013), MOL Review (2013) and Appendix E.

3. Area of Special Character (AOSC): Some amendments have been made.. Please refer to evidence base: Area of Special Character Boundary Review (2013) and Appendix E.

4. Site of Importance to Nature Conservation (SINC): Document amended.. Please refer to evidence base: Sites of Importance for Nature Conservation (SINC) (2013) and Appendix E.

5. Retail: Document amended, Primary and Secondary Shopping Frontages are now shown for Enfield Town.

Main Issue 8: Concern about numbers of betting shops in town centres

Local residents and organisations raised concerns on a number of occasions during consultation events (Appendix D) regarding the number and clustering of betting shops in town centres.

Proposed Submission Response:

Summary of change: Document amended

The DMD has been amended to include a new policy, DMD 33: Betting Shops. This policy seeks to control the negative aspects associated with betting shops. Clustering of uses will be prevented to ensure that there is no harm to the vitality and viability of centres, or harm caused through anti-social behaviour.

3 Development Management Document Proposed Submission

3.1 The Proposed Submission DMD is being published for consultation between **Wednesday 10th July and Friday 27th September 2013**. The DMD and all supporting documents are available to view at the following locations:

- Enfield's Public Libraries
- The Civic Centre, Enfield Town

3.2 The documents are also available to view on the Council's website at: www.enfield.gov.uk/dmd.

3.3 Prior to the formal submission of the DMD, in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council is inviting representations to be made to consider whether the Plan is legally compliant and sound. Any representations made will be submitted to and considered by a Planning Inspector.

3.4 Comments should be made in writing and sent to:

Strategic Planning & Design
Enfield Council
FREEPOST NW5036
Civic Centre
Silver Street
Enfield
EN1 3BR
Tel: 020 8379 3866
Fax: 020 8379 3887

or email: localplan@enfield.gov.uk

3.5 Please note that all comments made on the Proposed Submission Report will be made available for public inspection.

What happens next?

3.7 Following this publication period the Council will submit the DMD to the Secretary of State for Communities and Local Government who will arrange for it to have an independent examination. It is anticipated that this will take place towards the end of 2013 or beginning of 2014.

Appendices A - D

Appendix A: Press notice

ENFIELD COUNCIL
The Town and Country Planning (Local Planning) (England)
Regulations 2012
Regulations 12, 13 and 18

Notice is hereby given that Enfield Council is consulting on the following planning documents

Draft Development Management Document (DMD) – part of Enfield’s Local Plan

The DMD provides detailed criteria and standard based policies for assessing planning applications. This borough wide document will apply to all planning applications from home extensions to large scale applications for residential, commercial and mixed use development.

The Draft DMD, a summary consultation document, evidence base studies, and a draft Policies Map (previously called the Proposals Map) are available to view on the Council’s website at www.enfield.gov.uk/dmd.

Discover Central Leaside Towards a Draft Area Action Plan - part of Enfield’s Local Plan

The Central Leaside Area Action Plan (AAP) is being prepared to provide an up to date planning policy framework to underpin the regeneration in the south east of the borough. Discover Central Leaside – towards a draft Area Action Plan is an interim engagement document to bridge the gap between the consultation document published in 2008, the changes which have occurred on the ground since 2008 and plans for the future. The Discover Central Leaside AAP is available to view on the Council’s website at www.enfield.gov.uk/centralleaside

Copies of the DMD and Central Leaside AAP can be requested from the Planning Policy Team on 020 8379 3866. Reference copies will also be available at the Civic Centre and local libraries.

Comments can be made on-line at <http://consult.enfield.gov.uk/portal>, sent by email to ldf@enfield.gov.uk or made in writing and sent to:

Planning Policy Team
Regeneration Leisure and Culture
London Borough of Enfield
Civic Centre
Silver Street
Enfield
EN1 3XE

Draft Meridian Water Masterplan Supplementary Planning Document

The Masterplan for Meridian Water will guide the regeneration of the area around IKEA and Tesco in Upper Edmonton to create up to 5,000 new homes and 3,000 new jobs as an extension and growth of surrounding communities. The plan will show where and how these homes and jobs will be created, along with where the schools, health centre and community facilities will be developed to transform this area of Edmonton. Copies of the Draft Meridian Water Masterplan are available at the Civic Centre, Edmonton Green and Fore Street Libraries, and on the Council’s website at www.enfield.gov.uk/meridianwater

Comments on the plan can be sent to neighbourhoodregeneration@enfield.gov.uk or sent by post to:

Meridian Water Masterplan Consultation
Neighbourhood Regeneration Team
London Borough of Enfield
B Block South
Civic Centre
Silver Street
Enfield
EN1 3XE

The deadline for comments on all three documents is the 3rd August 2012

www.enfield.gov.uk



Appendix B: Table of events

Date		Event	Location	Time
March – April 2012		All Area Forums	Boroughwide	
Thursday	26 th April	South West Partnership Board	TaB, Palmerston Road (Palmer's Green)	
Tues	1st May	Conservation Advisory Group	Room 1, Civic	7pm
Friday	18th May	On Your Doorstep	Edmonton Library	2-5pm
Thurs	17 th May	North East Enfield Partnership	CHENEL, Hertford Road, Enfield	3pm
Tues	22nd May	Business and Retailer Meeting	Artzone	5.30-8pm
Friday	25th May	On Your Doorstep	Mottingham Hall N9 8DX	2-5pm
Sat	26th May	Consultation Drop In Event	Angel Community Centre	12-4pm
Thurs	31st May	Area Youth Forum- Edmonton	Ponders End Youth Club	6.30-8.30pm
Friday	1st June	On Your Doorstep	Bullsmoor Library	2-5pm
Friday	8th June	Drop In Consultation Event <i>including On Your Doorstep</i>	High Rd Open Space, New Southgate	2-5pm
Friday	15th June	On Your Doorstep	Four Hills Estate/Hoe lane (Chase)	2-5pm
Sat	16th June	Transforming Edmonton Event	Community House	11-3pm
Wed/ Thurs	20 th / 21 st June	Civic Centre lunch time consultation	Canteen, Civic Centre	12- 1.30

Proposed Submission Development Management Document
: Consultation Statement (2013)

Date		Event	Location	Time
Thurs	21st June	Edmonton Leaside Partnership	Community House	5-7pm
Friday	22nd June	On Your Doorstep	Enfield Highway Library	2-5pm
Thurs	28 th June	Edmonton Partnership	Community House	7pm – 9pm
Fri	29 th June	On Your Doorstep	Fore St, Edmonton	2pm
Mon	2nd July	Drop In Consultation Event with EREC	Community House	10- 2pm
Wed	4 th July	Health Improvement Partnership	Civic Centre	2- 4pm
Sat	7 th July	IKEA event	Ikea reception	10- 4pm
Tues	10 th July	Developers Forum	Civic Centre	4-6
Thurs	12 th July	Strategic Housing Forum		
Friday	13th July	On Your Doorstep	outside JCP, Aldermans Hill (Palmers Green)	2-5
Sat	14 th July	Angel Community Centre – Summer Open Day	Angel Community Centre	11- 2.30
Sun	15th July	<i>Bangla Mela, Ponders End Park inc On Your Doorstep</i>	Ponders End Park	afternoon
Thurs	19 th July	Over 50s Forum	Millfield House	10.30
Sat/Sun	20/21st July	Edmonton Carnival and Festival <i>including On Your Doorstep</i>	Jubilee Park	Sat 12.30-7pm Sun 1-6pm
Tues	24th July	Drop in Consultation Event with One to One Enfield	Community House	10-2pm
Friday	27th July	On Your Doorstep	TaB, Palmerston Road (Palmers Green)	2 -5pm
Friday	10th Aug	On Your Doorstep	Broomfield Park (Southgate Green)	2 -5pm

Proposed Submission Development Management Document
 : Consultation Statement (2013)

Date		Event	Location	Time
Friday	17th Aug	On Your Doorstep	Town Park (Grange)	2 -5pm
Friday	24th Aug	On Your Doorstep	Park Road (Enfield Lock)	2 -5pm
Friday	31st Aug	On Your Doorstep	Grovelands Park (Winchmore Hill)	2 -5pm
Friday	14th Sept	On Your Doorstep	outside Tesco, Ponders End High Road	2 -5pm
Friday	21st Sept	On Your Doorstep	Enfield Town	2 -5pm
Thurs	22 nd Nov	Over 50s Forum	Enfield Highway Community Centre	10-12pm

Appendix C: List of respondents

No.	Respondent	Organisation
1.	Chris Thomas	Chris Thomas Ltd on behalf of British Sign & Graphics Association
2	Carla Fulgoni	The Planning Bureau Ltd on behalf of McCarthy & Stone Retirement Lifestyles Ltd
3	John Davies	The Enfield Society
4	Angela Atkinson	Marine Management Organisation
5	K. Parker	
6	N. Gates	
7	I. Cates	
8	C. Lange	
9	Sally Moore	St Paul's Primary School
10	Susan Tranter	Edmonton County School
11	Paul Carter	Paul Carter Planning on behalf of Opticream Ltd
12	Joanna Male	Gregory Gray Associates on behalf of garden Centre Group (Enfield Garden centre) Crews Hill
13	Carmelle Bell	Thames Water
14	David Hammond	Natural England
15	Esther Kurland	Urban Design London
16	Claire Martin	LVRPA
17	Dennis Stacey	CAG
18	K. Jetha	Resident
19	Rose Freeman	Theatres Trust
20	Salvatore Amico	Attwaters Jameson Hill Solicitors
21	Lucy Drake	Thomas Wrenn Ltd
22	Caroline Draper	CGMS on behalf of IKEA
23	Lesley Walls	One to One Enfield
24	Penny Moss	Montagu Evans on behalf of Standard Life Investments UK Shopping Centre
25/28	Claire McAlister	British Waterways/ The Canal & River Trust
26	P Keywood	Burnett Planning and Development Limited on behalf of Universities Superannuation Scheme Limited
27	Neil Cottrell	Banner Homes
29	Simon Ward	Cuckoo Hall Academy
30	Alan Gunne-Jones	College of Haringey, Enfield & North East London
31	Jonathan Dixon	JB Planning Associates on behalf of Coffey Properties
32	J Krause	Drivers Jonas Deloitte on behalf of Segro
33	Kai Mitchell	Environment Agency
34	Penny Ager	GVA Grimley on behalf of LaSalle Investment Management
35	Sara Dilmamode	LB Haringey
36	Alister Henderson	Planning Potential on behalf of National Grid
37	Philip Murphy	Quod Planning on behalf of Dwyer Asset Management Plc
38	Odette Carter	Herts & Middx Wildlife Trust

No.	Respondent	Organisation
39	James Armitage Hobbs	Savills on behalf of Legal & General and National Grid
40	Carolyn Wilson	On behalf of Mobile Operators Association
41	Chris Pittock	On behalf of Hadley Property Group Ltd
42	Patrick Blake	Highways Agency
43	Vanessa Garner	Metropolitan Police
44	Stuart Slatter	Planning Potential of behalf of Fairview Homes
45	Matthew Brewer	CgMs on behalf of Notting Hill Housing
46	Graham Saunders	English Heritage
47	Barbara Herridge	North London Waste Authority
48	Dr Shahed Ahmad	Enfield Health Improvement Partnership
49	Danielle Shap	Resident
50	Sue Warrington	Chace Community School
51	G. Ansell	Resident
52	Colin Wilson	Greater London Authority
53	Antoinette Goldwater	Fleecefield Primary & Brettenham School
54	J Soday	Latymer School

Appendix D: Summary of comments raised at Consultation Events

One to One Consultation Event Date: Tuesday 24 July 2012

Voluntary and Community Sector Strategy Group Date 20.6.12

Enfield Racial Equality Council (EREC) event Date: 2nd July 2013

Concerns were raised about **Jobs and the Economy**. Residents/Local groups advised that a mix of jobs were needed in the borough and the following factors should be considered:

- Jobs, not only for the young population, but also for the 50+;
- Supporting facilities for employees including affordable childcare for single parent families;
- The need for apprenticeship schemes which lead to a permanent position at the end of the scheme;
- The need for low skilled jobs;
- Training schemes for local people; and
- Colleges or the Council should work in partnership to offer afternoon sessions to teach basic English.

The following issues were raised about **Housing**:

- It is important to meet the needs of local people rather than needs of developers;
- Support for provision of family sized housing – and the need to protect and provide new family sized homes (3 bed plus);
- One respondent said that high rise flats were not in themselves unacceptable but there was a need to avoid the mistakes of the 1960s such as poor built quality, difficulties with maintenance, a lack of infrastructure and poor management;
- Questions were raised on what is affordable to local people;
- Recognition that there was a concentration of social housing in the east of the borough
- Recognition of the need to provide infrastructure to support development - schools, GPs, dentists etc;
- There are too many houses being converted to flats;
- Concern over the lack of homes for the elderly; and
- Concern over the adaptability of homes for people with disabilities.

The following issues were raised about **Town Centres**:

- Concern raised about the increasing number of betting shops in the borough and the clustering of betting shops (Palmer's Green and Edmonton given as examples - 5 betting shops in Palmer's Green and problems in Fore Street);
- There are too many takeaways and restaurants;
- There are too many empty shops and empty units above shops;
- Poor sign-posting;
- Not enough shops;
- Problems with litter and vandalism;

- Enfield Business & Retail Association raised concerned over the change of use and increase in the number of betting shops;
- There is a lack of parking;
- There is a lack of access to community facilities;
- Public transport is poor;
- There is no hub of activity/attraction in town centres;
- Concerned about the number of charity shops on Southgate High street;
- There needs to be an appropriate mix of shops;
- Concern regarding the selling of fruit outside of shops, and the need for tidy shopfronts was raised at Area Forums;
- With regards to take-aways, there were concerns with the clustering of these; health issues and rubbish/litter. Supportive of policy preventing clustering; and
- The introduction of the one-way system in Enfield Town has affected footfall and viability of the shops along London Road.

Proposed Submission Development Management Document

Consultation Statement

Appendix: Appendix E

(March 2013)



Appendix D: Summary of Consultation Responses on **the Draft Development Management Document (DMD)**
(May – August 2012)

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
Letter	1a.	British Sign & Graphics Association	Chris Thomas	DMD 42: Advertisements 3rd bullet: Prohibition of internally illuminated box fascias and projecting box signs is unjustified, unduly restrictive and contrary to the control of advertisements regulations.	Text amended. DMD 41, Part 3) includes amended text on internally illuminated signs.
Letter	1b.	British Sign & Graphics Association	Chris Thomas	DMD 42: Advertisements 4th bullet: Planning consent cannot withdraw deemed consent (refer to para 16 of the annex of DCLG circular 03/2007 and Control of Advertisements regulation 14(6))	Text amended. Text restricting the proportion of the window area taken up with advertisements has been removed from DMD 41 on Advertisements. However, text has been added to DMD 40 (Ground Floor Frontages) to restrict the degree to which glazed areas are obscured by any means, and also changes to the supporting text.
Letter	2a.	The Planning Bureau Limited on behalf of McCarthy and Stone Retirement Lifestyles Ltd	Carla Fulongi	Chapter: Housing Housing for older people: <ul style="list-style-type: none"> • Object to the lack of dedicated policy support and references to addressing the housing needs of older people. • Policy should be included in line with the requirements of the National Planning Policy Framework (NPPF), National Strategies and commitments made in the Core Strategy. • A proactive positive policy should encourage a range of high quality, well designed accommodation for the ageing population subject to reasonable locational, design and sustainability criteria. 	No change. Housing policies in the DMD seek to address all housing needs, including the needs of older people. These policies support a range of housing accommodation suitable for older people including mainstream (with the potential for adaptation), affordable, and finally, specialist housing for those who need different levels of care and support. The Housing policies do not prohibit or restrict developers from providing housing dedicated to meeting the needs of older people where it can be demonstrated that development meets relevant criteria, including the criteria suggested in the representation.

Appendix D: Summary of Consultation Responses on **the Draft Development Management Document (DMD)**
(May – August 2012)

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
Letter	3a.	The Enfield Society	John Davies	Design Considerations Appendix: Support protecting character of areas that are not conservation areas. Support identifying these areas.	Support noted. This appendix has been removed from the DMD, however, the areas are identified in Enfield's Characterisation Study (2011), which supports the DMD.
Letter	3b.	The Enfield Society	John Davies	Design Considerations Appendix: Suggests including Cotswold Way-Bincote Rd due to its unique character which requires protection from insensitive additions.	This appendix has been removed from the DMD. DMD 37, Part 2) requires the reinforcement of positive characteristics of the area. The most up to date evidence base documents should be used to identify areas where existing character should receive particular attention and protection. Specific guidance for different areas will be more appropriate as part of forthcoming Supplementary Planning Documents (SPDs).
Email	4a.	Marine Management Organisation	Angela Atkinson	No comment.	Noted.
Email	5a.		K. Parker	Policies Map (Green Belt designation): Request that the green belt designation on land on the north side of Goat Lane, EN1 and adjacent to the western bank of the New River is removed.	No change. The purpose of the Green Belt Review was to make adjustments to the Green Belt boundary to ensure its permanence beyond the plan period. The green belt boundary is a well defined boundary and there are no justifiable grounds to redraw the boundary in this way at this location.
Summary Document response	6a.		N. Cates	Responses from summary consultation document. <i>Housing need</i> – support – recommend more security plans <i>Housing standards</i> – Good to have a lot of garden space <i>Improve residents homes</i> – support <i>Community facilities and health</i> – Support –	Comments noted.

Appendix D: Summary of Consultation Responses on **the Draft Development Management Document (DMD)**
(May – August 2012)

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
				<p>no hot food (takeaway) prevents litter <i>Create vibrant high streets</i> – improve Edmonton centre as much as Enfield Town <i>Good Quality design</i> – Support <i>Sustainable transport</i> – extra cycle parking should provide protection from theft <i>Climate change</i> – strongly support <i>Protect from pollution</i> – More bins, more public centres for rent by local residents <i>Open spaces for play</i> – park wardens to ensure children’s safety <i>Protect natural environment and green belt</i> – strongly support</p>	
Summary Document response	7a.		I. Cates	<p>Responses from summary consultation document. <i>Housing need</i> – This is a good idea and it will improve Edmonton’s cramped housing. <i>Housing standards</i> – Garden space is very important as it allows children to play in their parents presence rather than playing out by themselves. <i>Improve residents homes</i> – Good. <i>Community facilities and health</i> – More outdoor gyms need to be introduced also cheap salads/healthy food stores near school for cheap healthy food for school kids. <i>Help businesses</i> - Making more jobs, apprenticeships and work experience/voluntary schemes to encourage people to start their own business. <i>Create vibrant high streets</i> – Double glazing windows and doors, repaving the pavements</p>	Comments noted.

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				<p>and more handmade graffiti style painted walls near parks. <i>Good Quality design</i> – Good ideas. <i>Safeguard heritage assets</i> – I agree. <i>Sustainable transport</i> – cyclist routes and safe bike stands. <i>Climate change</i> – Solar panels on top of bus stops, promoting recycling, recycling workshops for children and families. <i>Protect from pollution</i> – More bins. <i>Open spaces for play</i> – CCTV cameras to avoid graffiti and misusing the space and vandalism. <i>Protect natural environment and green belt</i> – Good.</p>	
Summary Document response	8a.		C Lange	<p>Responses from summary consultation document. <i>Housing need</i> – include parks, allotments, street benches and floral islands to create a community. <i>Housing standards</i> – all housing should have disabled facilities to allow people to remain in their homes as their circumstances change. <i>Improve residents homes</i> – support loft and garage conversions rather than extensions. <i>Community facilities and health</i> – more trees planted to clean the air. <i>Help businesses</i> – allow small cafes to put tables outside. <i>Create vibrant high streets</i> – encourage businesses to sponsor benches. <i>Good Quality design</i> – want attractive building</p>	Comments noted.

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				design. <i>Sustainable transport</i> – stop adult cyclists using pavements. <i>Climate change</i> – motion sensed solar lighting on all Council buildings, flats, schools, street lights. <i>Protect from pollution</i> – plant more trees. <i>Open spaces for play</i> – stop selling land to other councils and allowing them to build on it. <i>Protect natural environment and green belt</i> – stop building on allotments. Create water way festivals.	
Email	9a.	St Paul's School	Sally Moore	Policies Map (open space designation): Object to changes to open space designation around St Paul's school, Winchmore Hill, N21.	Boundary amended to reflect respondents comments. Refer to Open Space Policies Map Review June (2013).
Email	10a.	Edmonton County School Bury Street campus	Susan Tranter	Policies Map (open space designation): Agree to proposed changes to open space designation at Edmonton County School.	Comments noted.
Email	11a.	Paul Carter Planning on behalf of Opticrealm Ltd	Paul Carter	Policies Map (Green Belt designation): Support proposed changes to the Green Belt designation on land at 1-3 Waggon Road, Hadley Wood.	Comments noted.
Email	11b.	Paul Carter Planning on behalf of Opticrealm Ltd	Paul Carter	Policies Map (Area of Special Character): Object to the inclusion of parts of the rear gardens of Nos. 3 to 21 Waggon Road in the Hornbeam Hills South Area of Special Character Area. This land has the character of "highly cultivated rear gardens".	No change. Please refer to evidence base: Area of Special Character Boundary Review (2013).
Email	12a.	Gregory Gray Associates on	Joanna Male	DMD 82: Green Belt (12.1.3): The outlined criteria do not fully reflect the list	DMD 82 (paragraph 11.1.1) text amended. References to appropriate development have

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		behalf of garden Centre Group (Enfield Garden centre) Crews Hill		<p>of new development excepted from the definition of ‘inappropriate development’ as set out in paragraph 89 of the National Planning Policy Framework (NPPF). Paragraph 89 does not restrict appropriate development to the limited extension, alteration or replacement of existing <u>dwelling</u>s. Instead it includes 2 new categories of appropriate development which relate to the extension, alteration or replacement of buildings in general, namely:</p> <ul style="list-style-type: none"> • <i>“the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building” and</i> • <i>“the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces”</i> <p>Since Draft DMD Policy 82: Protecting the Green Belt refers to the fact that <i>“applications for inappropriate development within the Green Belt will be refused”</i>, it is essential that the explanatory text accurately reflects National Guidance in its statement of the definition of such inappropriate development. Accordingly it is requested that paragraph 12.1.3 of the DMD be revised to accurately refer to <u>all</u> the exceptions to inappropriate</p>	<p>been deleted and replaced with cross references to the NPPF. The Policy should be read alongside other policies in the Chapter including DMD 89.</p>

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				development set out in paragraph 89 of the NPPF. Failure to do so would undermine the document's 'soundness' since it would not be consistent with relevant national policy.	
Email	12b.	Gregory Gray Associates on behalf of garden Centre Group (Enfield Garden centre) Crews Hill	Joanna Male	<p>DMD 91: Crews Hill: Concerned that the specific policies drafted for the Crews Hill Area do not provide adequate support for the continued business growth of established buildings as foreseen by the Core Strategy and in accordance with the new NPPF.</p> <p>Accordingly, it is requested that Draft DMD Policy 91 be revised to state: <i>"Sustainable garden centre related development will be permitted within the Defined Area, subject to the provisions of other policies within the Plan and to appropriate controls preventing diversification into inappropriate product lines".</i></p>	DMD 90 and 91 support development if it meets the criteria. For clarification, a definition of "Garden Centre" has been added to Glossary.
Email	13a.	Thames Water	Carmelle Bell	<p>DMD 69: Water Quality The policy is too narrowly worded to focus on SuDS and does not therefore adequately address sewerage and water infrastructure provision.</p> <p>The Development Management Document must include a separate policy (and supporting text) on waste water and water supply infrastructure specifically providing</p>	No change. The adopted Core Strategy already has a policy (Core Policy 21) to ensure water supply, sewerage and drainage infrastructure is in place in tandem with development. Therefore, another policy in the DMD specifying this is not necessary.

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				<p>support to the provision of water and sewerage infrastructure necessary to service development.</p> <p>It is important that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.</p>	
Email	13b.	Thames Water	Carmelle Bell	<p>DMD 57: Conserving Water:</p> <ul style="list-style-type: none"> • Support water conservation and the efficient use of water. • However, managing demand alone will not be sufficient to meet increasing demand and we adopt the Government's twin-track approach of managing demand for water and, where necessary, developing new sources, as reflected in our revised draft Water Resource Management Plan. It is important that the Development 	Support noted, no change. The adopted Core Strategy already has a policy (Core Policy 21) to ensure water supply, sewerage and drainage infrastructure is in place in tandem with development. Therefore, another policy in the DMD specifying this is not necessary.

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				Management Document helps to facilitate any necessary new water supply infrastructure.	
Email	13c.	Thames Water	Carmelle Bell	<p>DMD 58: Avoiding and Reducing Flood Risk:</p> <ul style="list-style-type: none"> • policy should explicitly cover the potential for sewer flooding. • policy should state that the developer will need to demonstrate through the submission of a drainage strategy, that down stream flooding of the sewer or combined sewer network will not occur as a result of their development or if flooding will occur as a result of the development, appropriate mitigation will be proposed to address the flooding. 	<p>The Flood Risk policies refer to all forms of flood risk, including sewer flooding. However, for clarification, the introductory text at paragraph 8.5.2 for this section has been amended to make clear that there is also the potential for sewer flooding.</p> <p>DMD 60 and 61 require the submission of a Strategic Flood Risk Assessment (SFRA), which should identify and assess all forms of flooding, and the management of surface water to ensure that this does not impact on the sewer network.</p>
Email	13d.	Thames Water	Carmelle Bell	<p>DMD 60: Surface Water:</p> <p>Policy should be more explicit that a drainage hierarchy should be applied in determining the approach to the disposal of all surface water, and not just SuDs.</p>	Text amended. DMD 61 and supporting text have been amended to incorporate the London Plan drainage hierarchy.
Email	13e.	Thames Water	Carmelle Bell	<p>DMD 66: Hazardous Substances:</p> <p>Sewage works and Deephams Sewage Works should not be classed as Hazardous Installations under Policy DMD 66.</p>	References to sewage treatment works and Deephams Sewage Works have been removed from the supporting text for Hazardous Installations policy and Appendix.
Email	13f.	Thames Water	Carmelle Bell	<p>DMD 3, 4, 50, 51, 52, 53, 54, 55, 56, 57, 60:</p> <p>The policy wording imposes blanket requirements that would apply to “non residential development”. This would therefore apply in most cases to water supply and waste water infrastructure developments within the Borough.</p>	The DMD, in conjunction with Core Strategy policies, provides sufficient flexibility with regards to feasibility and viability issues. Exceptional circumstances are specific to individual sites and it would be difficult and inappropriate to specify these in all policies. However, some minor changes have been made to policies and

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				The wording of the policies should be amended to recognise the specific technical, operational and financial constraints on infrastructure development proposals and utility infrastructure in particular. This could be achieved either through the inclusion of more explicit caveats within the policy or additional flexibility for utility infrastructure proposals where technical, operational, or financial issues may mean that it is not appropriate or viable to comply with the policy.	supporting text to clarify their application. The standards set out are in accordance with the requirements set out in the adopted London Plan, or have been informed by separate assessment. They are therefore considered to be the most appropriate.
Email	13g.	Thames Water	Carmelle Bell	DMD 40 and 41: Design of Business Premises: Section 7.1 of the Draft DMD does not define what is meant by the term “Business Premises” and no definition is included within the glossary. It is suggested that a more explicit definition of the proposals to which the policies would apply is provided. This would assist with the implementation of the DMD.	Definition of “Business Premises” added to glossary: “All buildings and land used for the carrying out of commercial, industrial or other non-residential operations, but excluding public buildings and institutions. Examples include shops, factories, warehouses, utility company premises and depots.”
Email	13h.	Thames Water	Carmelle Bell	DMD 45: Protection of Heritage Assets: The policy wording goes beyond the guidance set out in Section 12 of the NPPF in seeking to apply the same level of protection to both designated and undesignated heritage assets, without establishing any local justification. It is requested that the policy is amended to reflect the guidance in the NPPF on undesignated heritage assets.	Text amended for DMD 44. The weight attributed to the preservation/enhancement of a heritage asset will be proportional to the importance of that asset. This is set out in the NPPF and does not need to be repeated in the DMD. However, the word “normally” has been introduced into DMD policy

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					<p>44 to reflect that the impact on heritage assets will be one of a number of considerations affecting any application.</p> <p>The Council believes that, in line with the aims of DMD 37 (which in part aims to protect the unique character of places), valued heritage assets should normally be protected, no matter what their designation (or lack of one). All options for retention should be explored before an asset is damaged or lost. This is compatible with the NPPF's wording which states that "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application.....".</p>
Email	13i.	Thames Water	Carmelle Bell	<p>DMD 75: Waterways: Policy does not recognise that there may be technical, operational and financial viability constraints that make proposals for river restoration or de culverting unacceptable.</p> <p>The second sentence of the policy should also be reworded as the current wording is too vague for the policy to be implemented through the determination of planning applications.</p>	Text amended. References to river restoration and de-culverting have been removed from the Waterways policy (DMD 75) as these issues are already covered by DMD 63. DMD 63 does include some flexibility by expecting 'where possible' the removal of existing culverts. However, it is made clear that development should not involve further culverting. If there are exceptional circumstances which mean that development cannot achieve this, developers should demonstrate why this is the case - the policy does not prohibit this.
Email	13j.	Thames Water	Carmelle Bell	<p>DMD 82: Green Belt: The wording of criterion (d) "that no detrimental impact comes to the flora and fauna on site and nearby or where this is</p>	Text amended in DMD 82. This criterion has been deleted as this is covered in other policies.

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				impossible, be minimised to a satisfactory standard” should be deleted from the Policy. The wording duplicates other policies in the DPD and Core Strategy that seek to protect nature conservation/biodiversity. Furthermore, the current wording is unclear and not capable of implementation through the determination of planning applications.	
Email	13k.	Thames Water	Carmelle Bell	<p>DMD 83: Urban Fringe: The urban fringe policy does not clearly identify the area to which it relates.</p> <p>The lack of clarity as to the area that the policy relates to is compounded by the lack of a boundary being defined on the proposals map. This lack of clarity is considered to be unsound, as it would prevent the effective implementation of the policy. To the extent to which the Council may seek to apply this policy to Thames Water’s existing operational sites including the Deephams Sewage Works site, this is objected to.</p> <p>Concern is also raised to the wording of the policy as it appears to be seeking to extend protection for the Green Belt out to adjoining areas of land, without establishing the evidence to justify this. Any potential impacts on the Green Belt arising from development proposals outside should be properly assessed. There is however, no evidence set out for defining an additional area (without a</p>	<p>Text amended. DMD 83 has been reworded to reflect any development that is proposed adjacent to the Green Belt. This negates the need for a boundary to be drawn as the Green Belt designation will assist in clarifying those developments adjacent to the Green Belt.</p> <p>The objective of this policy is to ensure a clear distinction between the urban and rural uses. The particular characteristics of this Borough requires careful control to ensure creep development doesn’t harm the countryside.</p>

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				boundary) within which the provisions of Policy DMD83 would apply.	
Email	14a.	Natural England	David Hammond	Comments on Sustainability Appraisal (Paragraph 2.14 – Table 2.3): Reference is made to conserving and enhancing biodiversity, the Council needs to consider the increase of biodiversity/green infrastructure, where appropriate, alleviating access deficiencies and fragmentation issues. This will also link in with Chapter 16 of the document on Biodiversity.	Comments noted and have informed the Sustainability Appraisal for the Proposed Submission DMD.
Email	14b.	Natural England	David Hammond	Comments on Sustainability Appraisal (Table 2.4 Changes to the DMD following Sustainability Appraisal): This table includes references to ecological improvements and ecologically important sites, these changes are welcomed.	Comments noted and have informed the Sustainability Appraisal for the Proposed Submission DMD.
Email	14c.	Natural England	David Hammond	Comments on Sustainability Appraisal (Chapter 12: Climate): Natural England welcomes the reference to open spaces in this section and the role that they can play in not just leisure recreation but also climate change and health. Paragraphs 12.14 and 12.18 refer to open spaces/biodiversity as providing opportunity to alleviate heat island affects and as a means of adapting to Climate Change. This reference and recognition of the wide role of biodiversity is welcomed and to be	Comments noted and have informed the Sustainability Appraisal for the Proposed Submission DMD.

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				encouraged.	
Email	14d.	Natural England	David Hammond	<p>Comments on Sustainability Appraisal (Chapter 16: Biodiversity): Paragraph 16.8 regarding “green links/chains is welcomed and to be encouraged.</p> <p>The provision of ecological enhancements in development, as referenced under paragraph 16.11 is welcomed and supported, and is in line with paragraph 118 of the National Planning Policy Framework. This approach will also help increase as well as enhance the provision of biodiversity and ecology potential for the borough, and would be in line with our comments above.</p>	Comments noted and have informed the Sustainability Appraisal for the Proposed Submission DMD.
Email	14e.	Natural England	David Hammond	<p>Comments on Sustainability Appraisal: Paragraph 16.8 regarding “green links/chains is welcomed and to be encouraged.</p> <p>The provision of ecological enhancements in development, as referenced under paragraph 16.11 is welcomed and supported, and is in line with paragraph 118 of the National Planning Policy Framework. This approach will also help increase as well as enhance the provision of biodiversity and ecology potential for the borough.</p>	Comments noted and have informed the Sustainability Appraisal for the Proposed Submission DMD.
Email	14f.	Natural England	David Hammond	DMD Policy 70 – 79: These policies cover protection and enhancement of green/open spaces and ecology/biodiversity; however, the Council	DMD 79: Ecological Enhancements, in particular, will improve biodiversity/ecology within the borough.

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				may wish to revise the wording to include the need to increase biodiversity/ecology within the borough. This would strengthen the document and link into paragraph 16.11 of the Sustainability Appraisal.	
Email	15a.	Urban Design London	Esther Kurland	<p>DMD Policy 1 – High Quality Design Led Development:</p> <ul style="list-style-type: none"> • Is the By Design list the most appropriate to define poor design? Suggests NPPF list or inclusion of local criteria. • Need to add criteria about inclusion and durability 	<p>DMD 37 text amended to make it clear that inclusion and durability are included within the policy.</p> <p>By Design is considered to be the most appropriate source: It has been a long-standing source of guidance for practitioner and policy-makers. It provides principles against which a development can be tested rather than giving the impression of an exhaustive list of requirements or being too prescriptive.</p> <p>For local requirements to be useful, they would have to be much more specific, but the borough contains a huge variation of areas and development scenarios. It would be difficult to produce useful borough-wide policy. However, AAPs, SPDs and development briefs can be used to set out how the principles of design should be applied in specific scenarios/locations.</p> <p>“inclusion” is covered by the “ease of access” criterion. Text has been added to policy to make this explicit.</p> <p>“Durability” has been added to the “adaptable” category. Both are about longevity, and a place</p>

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					that is truly durable must be adaptable to prevent premature loss of the structure due to a change of use. Text has been added to the policy to make this explicit.
Email	15b.	Urban Design London	Esther Kurland	DMD Policy 1 – High Quality Design Led Development: Question how criteria relate to individual buildings.	No change to DMD 37. The By Design objectives can be applied at any scale. Detail on specific application would depend on a huge number of factors and could not be covered in sufficient detail in the DMD.
Email	15c.	Urban Design London	Esther Kurland	DMD Policy 1 – High Quality Design Led Development: What about requiring the use of design review in line with NPPF?	Text added to DMD 38: “Where appropriate, applications will be considered at design review panels. The advice of the panel will be a material consideration when assessing the application against policies within this DPD.”
Email	16a.	Lee Valley Regional Park Authority	Claire Martin	DMD should include a policy to guide future development within the Lee Valley Regional Park in accordance with the Park’s remit and Park Development Framework (PDF) proposals in terms of the protection and management of the Park and the public enjoyment of its leisure, nature conservation, recreation and sporting resources	The policy objectives suggested as part of a new LVRP policy are already covered by the Core Strategy Policies 11, 12, 35, 41, 44, 75, 78, and more detailed site specific proposals can be considered as part of the Central Leaside Area Action Plan and Ponders End Waterfront Supplementary Planning Document.
Email	16b.	Lee Valley Regional Park Authority	Claire Martin	DMD should include a policy that supports appropriate development in the Park that would be used in conjunction with Core Strategy Policy 35 and the framework it establishes to improve both access to the Park and its recreational potential. Suggest the following wording to be used: <i>the council supports the Lee Valley Regional Park</i>	The policy objectives suggested as part of a new LVRP policy are already covered by the Core Strategy Policies 11, 12, 35, 41, 44, 75, 78, and more detailed site specific proposals can be considered as part of the Central Leaside Area Action Plan and Ponders End Waterfront Supplementary Planning Document.

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				<p><i>Authority's (LVRPA) Park Development Framework (PDF) adopted Area Proposals schedule for the area of the Park within Enfield. These will be treated as a material consideration in the determining of planning applications in this area. In summary the current proposals address: a) development of Picketts Lock as a strategic leisure destination with enhanced pedestrian routes through to the site from Ponders End station and better connections from the towpath via a new pedestrian/cycle bridge; b) bringing land either side of the North Circular Road back into leisure use, creating new habitats and access to nature opportunities; c) protection of King George's and William Girling Reservoirs as nationally important habitats for waterbirds; d) delivery of waterside visitor facilities, footpaths and nature trails as part of the Ponders End waterfront project; e) increasing recreational use of the waterways and enhanced opportunities for pedestrians and cyclists throughout the park; f) protection of Rammey Marsh East as a site of special biodiversity interest and future provision of recreation and leisure facilities on Rammey Marsh west; g) on-going investment in Myddelton House and Gardens as a key visitor attraction and heritage resource; this policy is in conjunction with Core Strategy Policy 35.</i></p> <p>Justification text provided to support policy</p>	

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				above:	
Email	16c.	Lee Valley Regional Park Authority	Claire Martin	<p>DMD 74: (Playing Pitches): Welcomes the draft policy support for leisure development within the park at Picketts Lock provided by DMD 29 and DMD 90 – but is concerned that statements within other draft policies prevent the Authority from realising its preferred level of investment at Picketts Lock.</p> <p>Concerned that proposal options for 5-a-side sports pitches would be prevented by DMD 74 – resisting the applications for artificial pitches incorporating flood lighting on Metropolitan Open Land and Green Belt.</p>	No change to DMD 74. The Council has recently gathered information on the need and capacity for artificial grass pitches which have been informed the latest Open Space Assessment. The aim of the policies is to ensure that more intensified uses e.g. Artificial grass pitches stay in or close to areas where they are better served by public transport and do not add pressure to developing on the open space to accommodate parking.
Email	16d.	Lee Valley Regional Park Authority	Claire Martin	<p>DMD 44: Tall Buildings: Hotel development may be prevented by policy restrictions on the height of buildings within the Green Belt by DMD 90 and DMD 44.</p>	DMD 43 (Tall Buildings) is in conformity with the NPPF, no additional pressure should be placed on the Green Belt through uncontrolled building heights.
Email	16e.	Lee Valley Regional Park Authority	Claire Martin	<p>DMD 75: Waterways: Support elements of DMD 75, however whilst it is acknowledged that the waterways can perform many functions the Authority is concerned that the policy should allow for some sensitivity in how these various roles are delivered for example, in terms of pedestrian/cycle, access is usually restricted to one bank of the waterway, retaining the other side for wildlife and habitat enhancements to improve biodiversity. Allowing access on both sides of the</p>	Text amended for DMD 75. Policy has been amended and now only refers to maximising opportunities to provide publicly accessible greenways or shared routes.

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				waterway will limit the success of biodiversity enhancements and undermine the waterways function as an ecological corridor. Consider that the policy is re-drafted to take this on board.	
Email	16f.	Lee Valley Regional Park Authority	Claire Martin	<p>DMD 75: Waterways: The use of the waterways as a transport corridor will need to take account of existing and future leisure use of the waterways</p> <p>Suggest to include the following under DMD 75 under sub section Freight as follows: <i>The Council is supportive of maximising the transportation of freight by utilising Enfield's connection to the Lee Navigation, where both industry and the Edmonton EcoPark are located, provided that there is no adverse impact on the leisure use of the waterways</i></p>	Text amended for DMD 75. Additional wording in paragraph 10.4.5 has been incorporated to reflect opportunities to utilise Enfield's connection to the Lee Navigation.
Email	16g.	Lee Valley Regional Park Authority	Claire Martin	<p>DMD 75: Waterways: Supports the use of the waterways for recreational cruising and the associated need for visitor and casual moorings, but consider that the Moorings element of DMD policy 75 should also include a line at the end of part 2 of the policy to ensure <u>that there is no adverse impact on the leisure use of the waterways</u></p> <p>Seeks an amendment to DMD 75 to ensure consistency with the London Plan (LP policy 7.27) and that differentiates between</p>	Glossary text amended. Definitions now included. The definitions have been taken from the Canal & River Trust website. For the purpose of this policy, moorings would include leisure moorings; residential mooring, and trade mooring.

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Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
				recreational/visitor moorings and residential moorings to ensure that residential moorings are not promoted as acceptable development within the Park.	
Email	17a.	Conservation Advisory Group (CAG)	Dennis Stacey	Chapter 7: Built Environment: Policies relating to heritage assets are fragmented. Policies/guidance are spread across documents (Core Strategy, DMD) and there is concern that it will be difficult to navigate by developers.	No change. This is not a content issue. The plan making system necessitated a degree of fragmentation by requiring the production of a number of DPDs. Cross-references are already provided in the policy. Consideration will also be given to combining policy into a Local Plan as part of a revision of the Core Strategy.
Email	17b.	Conservation Advisory Group (CAG)	Dennis Stacey	Appendix: Conservation Statements: Conservation Statement not tied to any policy on conservation areas.	No change. Heritage Statements are required under DMD policy 44 (point 3 and paragraphs 6.5.7-6.5.8).
Email	17c.	Conservation Advisory Group (CAG)	Dennis Stacey	Appendix: Conservation Statements: Conservation Statement does not have sufficient prominence in the document in line with its importance. Similar comment for character appraisals and management plans.	No change. Heritage Statements are discussed explicitly in policy 44. Similarly, the need to respond to conservation area character appraisals is covered in paragraph 6.5.8 and in the Heritage Statements Appendix.
Email	17d.	CAG	Dennis Stacey	Appendix: Conservation Statements: Language in conservation statement is too vague: <ul style="list-style-type: none"> • “where one is required” • “if deemed necessary” • “seek advice” from whom? • “a reasoned explanation etc?” • Who deems what is “relevant evidence based documents relating to the heritage asset” • Similar concerns throughout. Sections 3(d) 	Text in Appendix on Heritage Statements amended. As is the case for all planning applications, the Council’s development management team need to make a judgement on what documents are relevant to the consideration of the application. This will be informed by consultation responses and the expert advice of heritage officers, professionals and organisations as required.

Appendix D: Summary of Consultation Responses on **the Draft Development Management Document (DMD)**
(May – August 2012)

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
				– 6 mentioned specifically.	
Email	17e.	CAG	Dennis Stacey	Concern that heritage officers will not be able to cope with the amount of advice the DMD requires them to give.	Comments noted. The development management team have a dedicated resource.
Email	18a.		K. Jetha	Request that the MOL designation is extended to include land to the west of the running track at Enfield College.	The proposed area for MOL designation has planning permission for a new school. It is therefore not considered appropriate to include it within MOL.
Email	19a.	Theatres Trust	Rose Freeman	DMD 21: Community Facilities: Support the draft document, but with one comment regarding DMD 21 para.4.1.11. Support DMD 21 because it protects existing community facilities which includes arts and cultural facilities at para.4.1.3. However para.4.1.11 only advises use classes D1 and D2 and for clarity and comprehensive guidance there should also be a mention of sui generis uses such as theatres which require planning permission for change of use.	Text amended. This list at para 3.1.1 is not intended to include a comprehensive list of community facility use classes. However, the wording has been expanded to include sui generis uses such as theatres.
Email	19b.	Theatres Trust	Rose Freeman	Support DMD 37 as it recognises the importance of the contribution entertainment and arts venues have to the evening economy. Likewise, DMD 43 includes good design for future leisure and cultural facilities	Comments noted.
Email	20a.	Attwaters Jameson Hill Solicitors	Salvatore Amico	Since Draft DMD Policy 82 Protecting the Green Belt refers to the fact that “ <i>applications for inappropriate development within the Green Belt will be refused</i> ”, it is essential that the explanatory text accurately reflects National Guidance in its statement of the	DMD 82 (paragraph 11.1.1) text amended. References to appropriate development have been deleted and replaced with cross references to the NPPF. The Policy should be read alongside other policies in the Chapter including DMD 89.

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				definition of such inappropriate development. Accordingly it is requested that paragraph 12.1.3 of the DMD be revised to accurately refer to <u>all</u> the exceptions to inappropriate development set out in paragraph 89 of the NPPF. Failure to do so would undermine the document's 'soundness' since it would not be consistent with relevant national policy.	
Email	20b.	Attwaters Jameson Hill Solicitors	Salvatore Amico	DMD 91: Crews Hill: Concerned that the specific policies drafted for the Crews Hill Area do not provide adequate support for the continued business growth of established buildings as foreseen by the Core Strategy and in accordance with the new NPPF.	Comments noted. DMD 90 and 91 support development if it meets the criteria.
Email	20c.	Attwaters Jameson Hill Solicitors	Salvatore Amico	DMD 91: Crews Hill It is not considered that this approach is consistent with the new Framework which indicates that there should be a presumption in favour of sustainable development and that this should take into account the economic and social, as well as the environmental advantages of any new development. Significant restrictions apply to the Crews Hill Defined Area as a result of its Green Belt designation. Specific policies relating to the area should not impose further restrictions by requiring <u>significant environmental advantages</u> but should reflect the presumption in favour of sustainable development set out in up to date national policy. This would allow	DMD 90 and 91 support development if it meets the criteria. For clarification, a definition of "Garden Centre" has been added to Glossary.

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(May – August 2012)

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
				<p>a full assessment of the proposal's merits to be undertaken, having regard to its economic, social <u>and</u> environmental consequences.</p> <p>Accordingly, it is requested that Draft DMD Policy 91 be revised to state: <i>"Sustainable garden centre related development will be permitted within the Defined Area, subject to the provisions of other policies within the Plan and to appropriate controls preventing diversification into inappropriate product lines".</i></p>	
Email	21a.	Thomas Wrenn Homes Ltd	Lucy Drake	<p>Policies Map (Nature Conservation designation): Objection by Thomas Wrenn Homes Ltd. to the designation of the entirety of Woodcroft Wildspace, Winchmore Hill, Enfield, N21 3QN as Local Site of Importance for Nature Conservation (SINC) (EnL14).</p> <p>Since the sale for development by LBE of the southern third of the former sports ground at Woodcroft in February 2012 it is no longer reasonable or logical to include this portion of the site, or the adjoining access way, within the proposed Local SINC.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • That the Site Boundary on the map on page 	<p>Change made to the Policies Map. Public access to the southern proportion of the site is now more restrictive and has been assessed as having less ecological value than land to the north. It now no longer meets the aims of the Local Site of Importance for Nature Conservation (SINC) designation, it is considered that this portion of the land should not form part of the Local SINC designation.</p>

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				<p>21 be re-drawn to exclude the area of 0.6ha at the southern end of the site which was sold by LBE to Thomas Wrenn Homes Ltd. in February 2012, and the adjoining access way which remains in Council ownership.</p> <ul style="list-style-type: none"> • That the area of Woodcroft Wildspace be altered from 2.0ha to 1.4ha in the Table on page 2 and the citation on page 21 (and anywhere else it appears in this form in any Draft DMD document). • That the map on page 6 be redrawn to exclude the area of 0.6ha at the southern end of the site which was sold by LBE to Thomas Wrenn Homes Ltd. in February 2012 and the adjoining access way which remains in Council ownership. 	
Email	22a.	CGMS on behalf of Ikea Properties Investment Limited	Caroline Draper	<p>DMD 29: New Retail and Leisure Development: Considers it is appropriate for the borough to seek to increase market share and to seek to strengthen centres and identify sequentially preferable sites.</p>	Comments noted.
Email	22b.	CGMS on behalf of Ikea Properties Investment Limited	Caroline Draper	<p>Considers it is appropriate for the policy documents to provide an appropriate framework to enable individual proposals that may come forward during the plan period to be considered on their own merit.</p>	Comments noted.
Email	22c.	CGMS on behalf of Ikea Properties Investment	Caroline Draper	<p>Considers that a sequential approach to identifying sites should be adopted but policy should not seek to prohibit all out of town developments</p>	It is considered that there is sufficient flexibility in the policy (DMD 25) to enable individual proposals to be considered on their own merits, through the application of a sequential approach.

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		Limited		Considers that there should be sufficient flexibility to enable individual proposals to be considered on their own merits	The policy is in line with the NPPF, focusing on growth and development in existing town centres and advocating a sequential approach.
Email	22d.	CGMS on behalf of Ikea Properties Investment Limited	Caroline Draper	<p>DMD 29: New Retail and Leisure Development: Considers that the policy is too restrictive and seeks to prohibit retail development outside of specific locations rather than providing criteria based policy drawing upon the criteria outlined within National Retail Planning Policy.</p> <p>Considers that the policy is inconsistent in its treatment of existing established retail locations. Some existing retail parks are recognised, but other equally important retail parks such as Glover Drive Retail Park (Ikea and Tesco) are not listed and allocated accordingly.</p>	No change. It is considered that the policy (DMD 25) is consistent with the NPPF. DMD policy adopts a town centre first approach, followed by edge of centre sites, or those well served by public transport. Retail Parks are identified in the Core Strategy. The approach is consistent with the Core Strategy.
Email	22e.	CGMS on behalf of Ikea Properties Investment Limited	Caroline Draper	<p>Chapter 5: Enfield's Economy:</p> <ul style="list-style-type: none"> • Considers these policies in the DMD are too restrictive and seek to protect too much land for traditional employment purposes and do not fully recognise the valuable contribution that retail uses also make to the economy. • Appointed Grant Mills Wood to review to Council's Employment Land evidence base and strongly disagree with the findings. • Considers that there is no justification for a 	<p>No change. It is considered that the policies (Chapter 4) are consistent with the Core Strategy.</p> <p>Core Policies already recognise the contribution that retail, leisure, offices, cultural activities, housing and community facilities make to the local economy, providing jobs and retaining expenditure within the local area.</p> <p>Employment policies are supported by an independent and up to date Employment Land</p>

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				restrictive employment policy framework which does not enable the alternative use of employment land subject to meeting relevant policy tests.	Review (2012) and the Council considers that the outcomes of the review are robust.
Email	22f.	CGMS on behalf of Ikea Properties Investment Limited	Caroline Draper	<p>Chapter 5: Enfield's Economy: Outcomes of Grant Mills Wood's review - Considers that the redevelopment of the land currently owned by Ikea or in the vicinity of the Ikea store for industrial and/or warehousing uses, will not be viable because:</p> <ul style="list-style-type: none"> • There is no demand from B1c and B2 users • Any schemes with imposed user restrictions will not be attractive to the investment market • Schemes could not be financed • The configuration and size of the sites do not warrant a SIL classification • Based on GLA's estimate suggesting a release figure for Enfield of over 30ha compared to nil release in the RT&P report, GMW argue that there is a significantly supply at over 15% of available buildings • Suggest that Enfield could immediately release 26.2 ha • Considers that RT&P is incorrect in suggesting there is limited supply and continuing demand. GMW consider there is high level supply, limited demand and no prospect of this changing 	<p>Employment policies are supported by a robust independent and up to date Employment Land Review (2012).</p> <p>The findings of the respondent's consultants (Grant Mills Wood) review are considered to be flawed.</p> <ul style="list-style-type: none"> • The forecasts informing the ELR were appropriate and consistent with GLA forecasts. • The ELR took account of the impact of the recession and whilst the national economy has flat-lined since publication of the ELR, in contrast the London economy grew. • The GMW report is misleading. It misrepresents the vacancy figures, in particular through the inclusion of development sites that are not currently available.

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				<ul style="list-style-type: none"> • Implies that RT&P's conclusion relating to future demand for warehousing will offset reducing industrial land demand is unrealistic and simplistic. GMW considers there is limited demand with buildings remaining vacant for long periods of time • Suggesting that 33ha of land can be released in released based on GLA's findings • Considers that warehousing demand is focused in the north of the borough • Considers many buildings throughout LBE are under occupied 	
Email	22g.	CGMS on behalf of Ikea Properties Investment Limited	Caroline Draper	Chapter 5: Enfield's Economy: Considers that the proposed allocation of Strategic Industrial Land (SIL) within the Meridian Masterplan are inappropriate.	Employment policies are supported by an independent and up to date Employment Land Review (2012) and the Council considers that the outcomes of the review are robust. The DMD does not propose any changes to SIL. The SIL designations were tested as part of the examination of the Core Strategy (adopted November 2010).
Email	23a.	One to One Enfield	Lesley Walls	<p>DMD 8: Loss of Residential Units: Support for the draft policy so long as the exception remains that the provision of a community facility will over ride the Council's resistance to the loss of existing residential units;</p> <p>Under (d) add further bullet point that "a detailed financial viability assessment" would be an additional test to be used to</p>	<p>No change. The exception with regards to community facilities remains (DMD 4, part 1 b.).</p> <p>Residential uses are usually associated with higher values and therefore are most viable. The intended principle in this policy is to prevent the unnecessary loss of residential units given the significant need for housing. Therefore, the consideration of financial viability as a one of the list of standalone criteria in this policy would not</p>

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				demonstrate that continuing residential use is not satisfactory and / or impractical.	be acceptable.
Email	23b.	One to One Enfield	Lesley Walls	Chapter 4: Community Facilities (paragraph 4.1.3): Support the examples of community facilities including Health Facilities and Day centres (for) vulnerable adults and carers	Comments noted.
Email	23c.	One to One Enfield	Lesley Walls	DMD 20: Provision of New Community Facilities: Support the policy criteria for the delivery of community facilities. Add to bullet point 2: “Makes an efficient and effective use of land and buildings, and where appropriate, provides opportunities for co-location, flexible spaces and multi-use. <i>Subject to meeting the tests under other policies, a location within designated Metropolitan Open Land or other Local Open Space may be appropriate and may amount to very special circumstances</i> ”.	No change. Very special circumstances need to be considered on a case by case basis and there cannot be a specific exemption for this type of use on MOL or other local open space. The NPPF tests still need to be met.
Email	23d.	One to One Enfield	Lesley Walls	DMD 71: Protection and Enhancement of Open Space: Add to text: Community Facilities should be treated as development which meets the very special circumstances test.	No change. Community facilities can complement the function and activity on open spaces but in some cases can prevent the primary aims of including wide open spaces for recreation. The DMD has specific policies for community facilities in appropriate locations.
Email	23a.	One to One Enfield	Lesley Walls	Policies Map (Metropolitan Open Land): Request further changes to boundary of MOL (around Albany Park & Oasis Hadley Academy) to exclude car park which serves the Leisure Centre and fronts onto Connop	No change. The area plays an important role in providing a break in the built environment and has suffered through incremental development. The site continues to meet the aims and objectives of the MOL and open space policy and

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				<p>Road, and to exclude the College Farm site and adjacent children’s playground.</p> <p>These areas should not form part of designated MOL because of their built and developed form which is separate from the wider open space of Albany Park.</p>	will be protected from further encroachment.
Email	24a.	Montagu Evans on behalf of Standard Life Investments UK Shopping Centre	Penny Moss	<p>DMD 29: New Retail and Leisure Development: Reference to “main and bulk convenience goods” is not a term used in national or regional guidance because it is imprecise and not quantifiable therefore requested that this is amended to make reference to convenience goods in order to avoid confusion.</p>	Text amended. The term “main and bulk” is also used in Core Policy 17 and it is consistent to use it in the DMD policy. The term excludes small scale convenience goods.
Email	24b.	Montagu Evans on behalf of Standard Life Investments UK Shopping Centre	Penny Moss	<p>DMD 29: New Retail and Leisure Development and DMD 30: Primary shopping area and town centre boundaries:</p> <ul style="list-style-type: none"> • Recognises that it is important to delineate the area within which new retail and leisure development will be permitted and the importance of the distinction is clear between primary shopping area and town centre boundary to ensure that retail and leisure development is correctly directed to in-centre sites • Policy needs to make reference to primary shopping area rather than the town centre boundary as the 2 are different as indicated by national policy 	<p>DMD 25 text has been amended. References to primary and secondary shopping frontages, primary shopping areas and town centre boundaries have been amended to make them consistent and clear.</p> <p>Policy DMD 26 on Enfield town, in the supporting text (para 5.2.1 to 5.2.6), explains that primary and secondary frontages collectively form the primary shopping area within Enfield Town</p> <p>The policies map has been amended to show primary and secondary shopping frontages in Enfield Town.</p>
Email	24c.	Montagu Evans	Penny	Policies Map (Town centres):	Policy DMD 26 on Enfield town, in the supporting

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		on behalf of Standard Life Investments UK Shopping Centre	Moss	<ul style="list-style-type: none"> The plan does not define a primary shopping area for Enfield Town In order for Policy to be correctly defined it is important that a primary shopping area is defined 	<p>text (para 5.2.1 to 5.2.6), explains that primary and secondary frontages collectively form the primary shopping area within Enfield Town.</p> <p>The policies map has been amended to show primary and secondary shopping frontages in Enfield Town.</p>
Email	24d.	Montagu Evans on behalf of Standard Life Investments UK Shopping Centre	Penny Moss	<p>Policies Map (Town centre designations):</p> <ul style="list-style-type: none"> Concern relating to the proximity of a number of local centres and parades to Enfield Town and whether these should be included in the secondary frontage of the town centre or within the wider town centre boundary. 	<p>The town centre hierarchy and town centre boundaries have been established through evidence-based studies. The physical separation of the nearby local centres and parades from Enfield Town centre, and the different A-use class types they host and functions they perform in terms of meeting customer need mean that the existing boundaries are justified.</p>
Email	24e.	Montagu Evans on behalf of Standard Life Investments UK Shopping Centre	Penny Moss	<p>DMD 29: New Retail and Leisure Development:</p> <ul style="list-style-type: none"> Concern relating to the sequential test and that the Council should not pre-judge this exercise by suggesting locations that would be suitable for main town centre uses Recommended following change's to DMD 29: Part 1 section a) <i>new retail development for main and bulk convenience goods, comparison goods, and major leisure development will be permitted within <u>the defined primary shopping area</u> of Enfield Town and the four district centres as defined on the Policies Map; b) if no sites are suitable or</i> 	<p>Text amended. The policy (DMD 25) has been amended for clarity and is compliant with the NPPF policies on town centres and the sequential approach.</p> <p>The term 'main and bulk' has been retained – see the response to point 24a. above.</p>

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				<i>available within the <u>primary shopping area of the town centres listed in part a of this policy, development at edge of centre locations that are well connected to and within easy walking distance (up to 300m) of the primary shopping frontage will be permitted; c) <u>new retail and leisure development that is not located within the primary shopping area should be accompanied by a retail impact assessment that demonstrates that there is no harm caused to the vitality and viability of the borough's town centres</u></u></i>	
Email	24f.	Montagu Evans on behalf of Standard Life Investments UK Shopping Centre	Penny Moss	DMD 30: Enfield Town Concern that the policies map only defines the primary shopping frontages and not the secondary frontages and therefore part 2 of the policy does not correlate to an allocation on the policies map.	The Policies Map has been amended to include the secondary frontages, as referred to within the DMD policies.
Objective	25a.	British Waterways	Claire McAlister	DMD 75: Waterways: The Canal & River Trust objects to the requirement for developments to provide a riverside walk if this is on the offside (non-towpath side). Offside walkways can create increased maintenance requirements, exacerbate anti-social behaviour, and reduce opportunities for secure moorings and ecological habitats. Treatment of the offside should be considered site by site, or through a comprehensive strategy, rather than with a blanket approach that does not necessarily	Text amended. DMD 75 has been amended and now refers to maximising opportunities to provide publicly accessible greenways or shared routes.

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				enhance the waterway.	
Objective	25b.	British Waterways	Claire McAlister	DMD 75: Waterways: Cycle route should be described as a shared use path or 'greenway'. In London the towpaths experience significant pressure from a wide variety of users, and there can sometimes be conflict between cyclists and more vulnerable pedestrians	Text amended. DMD 75 has been amended and now refers to maximising opportunities to provide publicly accessible greenways or shared routes.
Objective	25c.	British Waterways	Claire McAlister	<p>DMD 75: Waterways: The 'River' should be clarified as the River Lee Navigation. Clarification is required on the definition of permanent moorings. With regard to c) this should read 'waterborne freight'.</p> <p>Support the requirement for industrial/commercial development which is exposed to a waterway to address the waterway and create pleasant and interesting views from that waterway.</p> <p>However, concerns raised about the requirement that, public access to the waterfront should be retained/ introduced where possible, with access for staff maintained as a minimum.</p> <p>Support the use of the waterside for amenity use by employees of the site, but for offside (non-towpath side) sites public access not generally supported.</p>	Text amended. The term 'Permanent Moorings' is now defined in the Glossary. DMD 75 has been amended and now refers to 'waterborne freight'. Also see response to 25b.
Objective	25d.	British	Claire	Residential moorings are not mentioned as	Text amended. The term 'Permanent Moorings'

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		Waterways	McAlister	part of the housing chapter. The Housing Minister, Grant Shapps, announced that they could provide a more sustainable and affordable form of accommodation. The criteria in DMD 12 would not be relevant to the consideration of residential moorings, including the standards for size, or ceiling heights, or even shared private amenity spaces. There is no definition of specialist housing, although moorings could be considered as such. The Waterways policy DMD 75 refers to permanent moorings, but it is not entirely clear if this includes residential moorings.	is now defined in the Glossary. This definition includes residential moorings. DMD 8 policy criteria would only be applied where relevant. Also see response to 25c.
Objective	25e.	British Waterways	Claire McAlister	DMD 28: Small Businesses Question whether this policy should also refer to business barges such as those at Tottenham Hale.	The policy (DMD 24) would apply to all businesses with floorspace of less than 50 sq m.
Objective	25f.	British Waterways	Claire McAlister	DMD 40 : Design Considerations for Business Premises: Support paragraph 7.1.3.	Comments noted.
Objective	25g.	British Waterways	Claire McAlister	DMD 45: Heritage (paragraph 7.4.19): Add reference to: <i>Historic Waterways: A working heritage (English Heritage and British Waterways)</i> . Access here: http://www.helm.org.uk/upload/pdf/HistWat.pdf	Comments noted. The section on further guidance has been removed from the Proposed Submission DMD.
Objective	25h.	British Waterways	Claire McAlister	DMD 51: Decentralised energy networks (DEN) <ul style="list-style-type: none"> Concern relating to the lack of referencing to pipe crossings over the River Lee 	Comments noted. No change required to DMD 52. DMD 75 specifically seeks to protect and enhance waterfront character.

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				<p>Navigation</p> <ul style="list-style-type: none"> DEN pipe crossings over the Navigation can have a detrimental impact on the waterway's character and appearance – appropriate mitigation is suggested. 	Comments will inform Area Action Plans for Central Leaside and North East Enfield.
Objective	25i.	British Waterways	Claire McAlister	DMD 55: Reference should be made to the potential for use of the River Lee Navigation to provide heating and cooling.	Text amended. Supporting text for DMD 56 now references the potential within the Lee Valley.
Objective	25j.	British Waterways	Claire McAlister	DMD 59: Assessing Flood Risk, (para. 9.4.4) Where appropriate (i.e. adjacent to the River Lee Navigation) the Canal & River Trust should also be consulted.	Comments noted. No change to Appendix 10. Text refers to consultation on Strategic Flood Risk Assessments only.
Objective	26a.	Burnett Planning and Development Limited on behalf of Universities Superannuation Scheme Limited	P Keyword	DMD 29: New Retail and Leisure Development: <ul style="list-style-type: none"> Seeks to amend part 1 a of this policy to: <i>New retail development for main bulk convenience goods, comparison goods, and major leisure development will be permitted within Enfield Town Centre and the four district centres as defined on the Policies map</i> – so that it reflects the wording in para 24 of the NPPF. 	The policy DMD 25 has been updated for clarity and is considered to be compliant with the NPPF policies on town centres. Town centre boundaries for Enfield Town and the four district centres are shown on the Policies Map.
Objective	26b.	Burnett Planning and Development Limited on behalf of Universities Superannuation Scheme Limited	P Keyword	DMD 29: New Retail and Leisure Development: <ul style="list-style-type: none"> Seeks to amend part 1 b of this policy to: <i>if no sites within the centres listed in part a of this policy are suitable for the proposed development, development at edge of centre locations that are well connected to and within easy walking distance (up to</i> 	The policy DMD 25 has been updated for clarity and is considered to be compliant with the NPPF policies on town centres.

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Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
				<i>300 metres) of the primary shopping area will be permitted” - so that it reflects the wording in para 24 of the NPPF.</i>	
Objective	26c.	Burnett Planning and Development Limited on behalf of Universities Superannuation Scheme Limited	P Keywood	<p>DMD 29: New Retail and Leisure Development:</p> <ul style="list-style-type: none"> Seeks to amend part 1 c of this policy to: <i>New retail and leisure development within the retail parks: Enfield Retail Park, De Manderville Gate, Ravenside and Angel Road as detailed in the Core Strategy and identified on the Policies Map will only be permitted if the applicant can demonstrate to the Council’s satisfaction that a sequential test has been applied which shows that there are no suitable sites for the proposed development that are available within or on the edge of the centres detailed in part a of this policy. Furthermore, that a retail impact assessment undertaken in accordance with NPPF paragraph 26 demonstrates that the development is not likely to have a significant adverse impact on one or more of the factors specified in that paragraph of the NPPF” – so that it reflects the wording in paragraphs 24-27 of the NPPF</i> 	The policy DMD 25 has been updated for clarity and is considered to be compliant with the NPPF policies on town centres.
Objective	26d.	Burnett Planning and Development Limited on behalf of Universities	P Keywood	<p>DMD 29: New Retail and Leisure Development:</p> <ul style="list-style-type: none"> Seeks to amend part 3 of this policy to: <i>Subject to satisfying the sequential test and demonstrating that the development is</i> 	The policy DMD 25 has been updated for clarity and is considered to be compliant with the NPPF policies on town centres.

Appendix D: Summary of Consultation Responses on **the Draft Development Management Document (DMD)**
(May – August 2012)

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
		Superannuation Scheme Limited		<i>not likely to have a significant adverse impact on one of more than the factors specified in paragraph 26 of the NPPF, proposals for new or enhancement of retail and/or other town centre uses will be permitted provided that all of the following criteria are met” - so that it reflects the wording in paragraphs 24-27 of the NPPF.</i>	
Objective	26e.	Burnett Planning and Development Limited on behalf of Universities Superannuation Scheme Limited	P Keyword	DMD 29: New Retail and Leisure Development <ul style="list-style-type: none"> Seeks to amend part 3 b of this policy to: <i>The siting of the proposed use and pedestrian access to it encourages connectivity to and from the existing town centre - so that it reflects the wording in para 24 of the NPPF.</i> 	DMD 25 text has been amended and moved to the justification and guidance section (para 5.12 – 5.1.5). The policy is considered to be compliant with the NPPF.
Objective	26f.	Burnett Planning and Development Limited on behalf of Universities Superannuation Scheme Limited	P Keyword	DMD 29: New Retail and Leisure Development <ul style="list-style-type: none"> Seeks to amend part 3 c of this policy to: <i>The design and siting of the development promotes visual continuity with the surrounding built environment” - so that it reflects the wording in para 61 of the NPPF.</i> 	DMD 25 text has been amended to reflect the suggested wording.
Objective	26g.	Burnett Planning and Development Limited on behalf of Universities Superannuation Scheme Limited	P Keyword	DMD 29: New Retail and Leisure Development <ul style="list-style-type: none"> Seeks to amend text after part 3 as: <i>If planning permission is granted, conditions may be used where necessary to control the nature and character of the development” – consider deleting:</i> 	DMD 25 has been amended to delete references to conditions that could be imposed.

Appendix D: Summary of Consultation Responses on **the Draft Development Management Document (DMD)**
(May – August 2012)

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
				<ul style="list-style-type: none"> ○ Prevent amalgamation of small units to create large out of centre units; ○ Limit internal alterations by specifying the maximum floorspace permitted; ○ Manage the type of goods sold or type of use or activity <ul style="list-style-type: none"> • So that it reflects the Circular 11/95 on circumstances in which conditions should be applied, considers it is contrary to this guidance to state blanket restrictions may be applied. 	
Email	27a.	Banner Homes	Neil Cottrell	<p>DMD11: Development of Garden Land:</p> <ul style="list-style-type: none"> • The proposed presumption against development of back garden land is unjustified and unnecessary and will have unintended economic effects on the Borough and London in general. • It will remove a crucial source of land supply for small and medium sized housebuilders and restrict housing choice and mix. • NPPF is essentially a pro growth document with the intention of delivering significantly more housing. NPPF does not cite a presumption against development of garden land. In particular, paragraph 53 states that LPAs should consider the case for setting out policies to resist <i>inappropriate</i> development of residential 	<p>No change to DMD 7. The importance of the residential perimeter block structure, as the prevailing urban form of residential development in the borough, is such that the Council will seek to ensure that this character is protected.</p> <p>For the principle of the development of garden land to be acceptable proposals must demonstrate that it can provide high quality residential development and that the remaining amenity/garden space will be high quality and able to perform a number of roles in order to compensate for a loss in the overall quantity of this space.</p> <p>It is considered that the policy is in conformity with the London Plan (Policy 3.5) and the NPPF.</p>

Appendix D: Summary of Consultation Responses on **the Draft Development Management Document (DMD)**
(May – August 2012)

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
				<p>gardens, for example where development would cause harm to the local area.</p> <ul style="list-style-type: none"> • Core Strategy Policy 2 does not cite a presumption against development of garden land. This policy forms part of the up-to-date Development Plan and was examined accordingly. • The Borough and gardens within it is vary markedly and there is nothing to suggest that, in all or most cases, the development of gardens would be unacceptably harmful to local character or other interests of acknowledged importance. • The approval of schemes on garden land may create visual and other advantages, plus also enhancing biodiversity. • Matters listed in the policy on suburban character, biodiversity and surface water are valid material considerations, but only should be applied when assessing the importance of individual gardens on an objective, site by site basis. A general presumption against development is completely unreasonable. The issue should not be one of principle but a matter of judgement in the normal course of the LPA's development management function. • The open space and amenity standards will still require developers to satisfactorily provide for the amenity, the sequential approach to flood risk is already applied 	

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Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
				<p>and associated policies which actively manage climate change.</p> <ul style="list-style-type: none"> Adopted Core Policy 2 expressly identifies a key role for small sites (of <0.5 ha) in the Borough for the Lifetime of the Core Strategy (until 2025) which is understood to include garden land. 	
	28a.	The Canal & River Trust	Claire McAlister	<p>Chapter 7: Built Environment (paragraph 7.1.3):</p> <p>The Canal and River Trust support the requirement for the highest standards of design on sites adjacent to the waterways</p>	Comments noted.
	28b.	The Canal & River Trust	Claire McAlister	<p>Chapter 9: Tackling Climate Change (paragraph 9.4.14):</p> <p>Where appropriate (i.e adjacent to the River Lee Navigation) the Canal and River Trust should also be consulted.</p>	Comments noted. No change. Text in Appendix 10 refers to consultation on Strategic Flood Risk Assessments only.
	28c.	The Canal & River Trust	Claire McAlister	<p>DMD 75: Waterways:</p> <p>The River should be clarified as the River Lee Navigation</p>	DMD 75 text has been amended.
	28d.	The Canal & River Trust	Claire McAlister	<p>DMD 75: Waterways:</p> <p>Need clarification on whether 'permanently moored vessels' refers to static commercial moorings, and residential moorings.</p>	DMD 75 text has been amended. The term 'Permanent Moorings' is now defined in the Glossary.
	28e.	The Canal & River Trust	Claire McAlister	<p>DMD 75: Waterways:</p> <p>With regard to c) should read 'waterborne freight'</p>	DMD 75 text has been amended.

Appendix D: Summary of Consultation Responses on **the Draft Development Management Document (DMD)**
(May – August 2012)

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
	28f.	The Canal & River Trust	Claire McAlister	<p>DMD 75: Waterways</p> <ul style="list-style-type: none"> • Support the requirement for industrial/commercial development to address the waterway and create pleasant and interesting views from that waterway. Concerns raised about the requirement for public access to the waterfront to be retained/introduced where possible. • Support the use of the waterside for amenity use by employees of the site. Offside (non-towpath side) sites would not generally support public access. If the site requires a secure boundary, as well as creating an additional maintenance requirement this can prevent the development from positively addressing the waterside, • Secondary offside walkways, where there is already a towpath, can also reduce opportunities for secure moorings and wildlife habitats, as well as exacerbating anti-social behaviour issues. • Comments on the issue of a secondary path on the offside also relate to the third paragraph of this policy, regarding a riverside walk, and or cycle route. 	Text amended. DMD 75 text has been amended and now only refers to maximising opportunities to provide publicly accessible greenways or shared routes.
Email	29a.	Cuckoo Hall Academy	Simon Ward	Policies Map (Metropolitan Open Land designation): Object to proposed expansion of MOL to include the running track.	The Council's proposed change amendment 3A to MOL 3 as reflected on the Proposed Submission Policies Map is required to include the remaining south-west corner of the athletics track (previously excluded due to a

Appendix D: Summary of Consultation Responses on **the Draft Development Management Document (DMD)**
(May – August 2012)

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
					cartographical error). This provides a defensible and logical MOL boundary and does not include land subject to the extant planning permission for a new school.
Email	29b.	Cuckoo Hall Academy	Simon Ward	Policies Map (open space designation): Support proposed changes to open space around Cuckoo Hall Academy and suggest further amendments.	Minor amendments have been made to reflect the practical situation on the ground. Please refer to the Open Spaces Policies Map Review (2013).
Email	30a.	College of Haringey, Enfield & North East London	Alan Gunne-Jones	Policies Map (Metropolitan Open Land designation): MOL Site 3 Object to proposal to amend the boundaries of the Metropolitan Open Land in the vicinity of the Enfield College, Hertford Road campus.	The Council's proposed change amendment 3A to MOL 3 as reflected on the Proposed Submission Policies Map is required to include the remaining south-west corner of the athletics track (previously excluded due to a cartographical error). This provides a defensible and logical MOL boundary and does not include land subject to the extant planning permission for a new school.
Email	31a	JB Planning Associates on behalf of Coffey Properties	Jonathan Dixon	DMD 23: Strategic Industrial Location: <ul style="list-style-type: none"> • Considers that the policy is misleading and incomplete • Considers that it should be amended to: <i>"Quasi-retail <u>Other employment-generating</u> uses such as car show rooms, hotel and conferencing facilities, <u>training centres, etc may be permitted...</u>"</i> 	DMD 19 has been amended.
Email	31b	JB Planning Associates on behalf of Coffey Properties	Jonathan Dixon	DMD 23: Strategic Industrial Location: <ul style="list-style-type: none"> • Consider the final paragraph of the supporting text should be amended as follows to ensure consistency with the policy: <i>There are some instances where there are <u>quasi-retail employment-</u></i> 	DMD 19 has been amended.

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(May – August 2012)

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				<i>generating uses..... In addition, there are other employment-generating uses such as hotel, conference facilities, training centres, schools etc that fall within use classes C1, D1 and D2 that do not require a town centre location so long as the transport options are available. In this respect, the Council considers that these uses would therefore be appropriately located on the main frontages of existing industrial areas.</i>	
Email	32a	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	DMD 1: Achieving High Quality and Design-Led Development: <ul style="list-style-type: none"> Support the need for high quality design within new developments within the constraints of maintaining viability within relatively low value areas, but considers it is important to take site context into account in design terms. Considers what is appropriate design in a residential area or town centre will differ from that is appropriate for commercial areas. 	No change to DMD 37. The importance of site context is recognised in the opening sentence of the policy and expanded upon in the supporting text. The difference in appropriate design based on area type is covered by the emphasis on the development's context.
Email	32b	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	DMD 2: Design Process <ul style="list-style-type: none"> Considers that some of the provisions made in this draft policy are very specific. Considers that the Council should ensure that there is sufficient flexibility provided in this policy to account for outline applications where such detailed statements may not be possible. 	Text in DMD 38 amended. The policy clarifies what the Council considers is necessary to demonstrate that the policy objectives have been met. The requirements are not considered to be too specific. The communication of the required information could take many forms, but is essential in

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					<p>understanding the design process and rationale that has been followed.</p> <p>The supporting text makes clear that the design and access statement should be proportional to the type of development being proposed. However, an analysis of the context of the development is as important for outline applications as it is for detailed ones.</p> <p>Design and access statements accompanying outline applications should show how the applicant has understood what is appropriate and feasible for the site in its context. The elements to be described in design and access statements will be the same regardless of whether the application is for outline or full planning permission, but their scope will differ.</p> <p>Text added to reinforce this in the policy: <i>“The level of detail contained in the Design and Access Statement should be proportional to the type of development being proposed.”</i></p>
Email	32c	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	<p>DMD 4: Environmental Assessment Methods</p> <ul style="list-style-type: none"> • Welcomes the aspirations for non-residential development in relation to BREEAM. • Noted that the Council will seek to exceed these standards only where it is technically feasible and/or viable to do so. • Supports the flexibility in this policy in light 	Comments noted. No change to DMD 50.

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				of the recent report “Viability Testing Local Plans Advice for Planning Practitioners”.	
Email	32d	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	<p>DMD 23:Appropriate Uses in Strategic Industrial Locations:</p> <ul style="list-style-type: none"> This policy in its current form does not offer sufficient flexibility for bringing forward development in these locations and does not acknowledge the need to attract a range of employment use classes in order to improve the economic viability of these locations and bring about a long-term transition of low-skilled towards more highly skilled manufacturing, urban logistics and R&D. Does not considers that the policy accurately reflects the need for flexibility. 	The policy (DMD 19) protects Enfield’s SIL and is in conformity with Enfield’s Core Strategy and the London Plan.
Email	32e	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	<p>DMD 26: New Employment Development:</p> <ul style="list-style-type: none"> Notes the requirements placed on developing within SIL but consider the required contributions should be robustly evidenced and should not unduly affect the viability of a scheme brought forward. Notes that the assessment of appropriateness for identifying flexible and suitable accommodation to meet future business needs is very important in relation to the ability of industrial units to meet the needs of “local businesses and small firms” to ensure flexibility for landowners and occupiers, but considers it is not always possible for these provisions 	Comments noted. The policy (DMD 23) ensures flexibility to enable adaptation to future needs while allowing a response to the particular local and site circumstances through the wording “where appropriate”.

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(May – August 2012)**

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
				to be made.	
Email	32f	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	<p>Box 3: Market Demand and Viability Assessments:</p> <ul style="list-style-type: none"> • Welcomes the provision made within box 3 to allow some flexibility for the use of employment land if there is no market demand or if it is unviable, but is not convinced with the approach to site marketing. Considers it is not always possible practical to agree the approach to site marketing. • Considers that the Council should set a minimum benchmark approach to marketing sites which landowners should accord with. Benchmark is recommended in the 2012 Employment Land Review (ELR). • Considers that merit should be given to alternative uses which contribute to provide a similar, or increased level of employment albeit that these may not be industrial uses. 	<p>Comments noted.</p> <p>The period for marketing of sites in Appendix 13 complies with the recommendations of the 2012 ELR.</p> <p>DMD 20 sets out consideration for development providing alternative forms of employment for Locally Significant Industrial Sites.</p>
Email	32g	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	DMD 35: Tourism and Visitor Accommodation: Does not consider that section 1) offers sufficient flexibility for developers to identify sequentially preferable sites which might be required for specific purposes, such as to meet the needs of business occupiers.	No change to DMD 31. It is considered that the policy provides a sufficiently flexible approach to tourist and visitor accommodation development that balances the needs of sustainable economic development, and is in accordance with the NPPF.
Email	34h	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	DMD 40: Design of Business Premises: Notes and appreciates the need for good design of business premises, but considers	DMD 39, paragraph 6.2.3 states that “In applying the standards, the Council will have regard to the operational requirements of the business and

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				this policy should not be overly prescriptive, as flexibility will need to be applied depending on the specific needs of potential occupiers to ensure that, first and foremost, it supports good functioning of a business.	viability”.
Email	32i	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	DMD 46: Parking Standards Supports the statement made at part (e) of the draft policy which seeks to ensure that the operational requirements and parking needs of commercial developments are met.	Comments noted. No change to DMD 45 1e)
Email	32j	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	DMD 54: Use of Roof Space Notes the aspiration to maximise the provision of green roofs and the greening of vertical spaces as far as reasonably possible but considers sufficient flexibility within this policy needs to be applied to ensure that this aspiration is balanced with the requirement for roof space if renewable technology such as photovoltaics is proposed as part of a development’s renewable energy generation.	Text in DMD 55 amended to reflect that requirements relate to green roofs and low and zero carbon technologies subject to technical and economic feasibility.
Email	32k	Drivers Jonas Deloitte on behalf of Segro	J Krause/ Rory Joyce	DMD 57: Water Efficiency <ul style="list-style-type: none"> • Considers that the policy should be sufficiently flexible to allow for developments where it may not be technically feasible or viable, particularly for large commercial developments, to meet targets. • Considers that on speculative development it is also important to note that water usage to be used in future occupier’s process (if at all) are often 	DMD 58 and supporting text (paragraphs 8.4.4 and 8.4.6) amended to take into account issues of technical feasibility and economic viability; and to provide guidance on the requirements for outline developments.

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				unknown at the planning stage	
Email	33a	Environment Agency	Kai Mitchell	The document contains good policies. Satisfied that there are no omissions.	Comments noted.
Email	33b	Environment Agency	Kai Mitchell	The document contains good comprehensive flood risk policies which provide a strong basis for ensuring that flood risk is managed in an appropriate way through development in the borough.	Comments noted.
Email	33c	Environment Agency	Kai Mitchell	There are still some references in the document to PPS25. All references to PPS25 should be replaced with appropriate references to the NPPF and the Technical Guide, or to the PPS25 Practice Guide, which remains current at this time.	Text amended. References to PPS25 have been removed.
Email	33d	Environment Agency	Kai Mitchell	DMD 60: Sustainable Urban Drainage <ul style="list-style-type: none"> Policy should be strengthened to read 'all developments must maximise the use of SuDS'. This creates a distinction between just incorporating some SuDS and incorporating the most SuDS that are practicably possible. 	DMD 61 amended.
Email	33e	Environment Agency	Kai Mitchell	Chapter 8: Tackling Climate Change (paragraph 9.4.18): This would be strengthened by changing incorporating to maximising.	Text in paragraph 8.5.11 amended.
Email	33f	Environment Agency	Kai Mitchell	DMD 62: Watercourses and Flood Defences As well as protecting watercourses and flood defences the Council should be aware of responsibilities under the Water Framework Directive (WFD) particularly article 4.7 and	Text in DMD 63 added to take into account the responsibilities under the Water Framework Directive.

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				how it applies to any physical changes to the water bodies.	
Email	33g	Environment Agency	Kai Mitchell	DMD 65: Land Contamination Support policy requirement for all planning applications, where contamination is suspected, to provide an initial assessment in the form of a preliminary risk assessment.	Comments noted.
Email	33h	Environment Agency	Kai Mitchell	DMD 65: Land Contamination: Section 10.2.6 refers to waste management issues and treatment of soils. Recommend also including reference to the Definition of Waste: Development Industry Code of Practice. This promotes re-use of appropriate materials on site (for example remediated soils) and also goes into detail about hub and cluster projects. This would be suitable for projects such as Meridian Water where there may be a number of site investigations and remediation occurring at similar times.	Comments noted for Central Leaside Area Action Plan.
Email	33i	Environment Agency	Kai Mitchell	Support comprehensive polices protecting the waterways.	Comments noted.
Email	33j	Environment Agency	Kai Mitchell	DMD 75: Waterways The first line of the policy could be amended from 'Major development' to 'development'.	Text in DMD 75 amended.
Email	33k	Environment Agency	Kai Mitchell	DMD 75: Waterways: The third paragraph of the policy would benefit from a stronger stance on biodiversity enhancements such as: 'along with biodiversity enhancements as outlined in the	The third paragraph of DMD 75 has been deleted. DMD 63: Protection of Important Watercourses and Flood Defences includes a reference to the River Basin Management Plan.

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				green infrastructure policy and the objectives of the Thames RBMP'. This would help to ensure that where the 'character' of the waterfront is predominantly hard edged or built up there would still be the opportunity to have environmental enhancements to the river.	
Email	33l	Environment Agency	Kai Mitchell	DMD 75: Waterways For the Moorings section (11.4 Waterways – Moorings) would like to have an additional point added: d) do not restrict opportunities for future river restoration.	DMD 75 amended to include d) there is no adverse ecological impact.
Email	33m	Environment Agency	Kai Mitchell	DMD 76: Wildlife Corridors (paragraph 11.5.1): Could wording be amended along the lines of: 'Wildlife corridors include watercourses and can include railway sidings'.	Comments noted. Text already refers to railways sidings and watercourses.
Email	33n	Environment Agency	Kai Mitchell	DMD 57: Water Efficiency: Add reference the Water Framework Directive in the justification for policy DMD57 (water efficiency).	Text amended in DMD 58, paragraph 8.4.3 to include reference to the Water Framework Directive.
Letter	34a	GVA Grimley on behalf of LaSalle Investment Management	Penny Agar	Policies Map (Green Belt designation): Request confirmation that the amended boundary to the west of Advent Way is aligned to the towpath edge of the Lee Navigation.	Confirmed.
Letter	34b	GVA Grimley on behalf of LaSalle Investment Management	Penny Agar	Policies Map (Green Belt designation): Seek a further amendment to the proposed boundary to exclude the existing development to the east of Harbet Road from the Green Belt (as shown in Appendix 3).	No change. There is no justification to exclude the land from its Green Belt Designation. There is a need to tightly define the area of Green Belt on the eastern edge to prevent

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				<p>It is not considered that this land contributes to the key functions of the Green Belt and the proposed boundary realignment provides a more appropriate boundary having regard to the extent of development that has taken place on the site and future potential of the site to contribute towards the regeneration of Meridian Water.</p> <p>A further benefit of the proposed alignment is that the open space to the east of the development on Harbet Road is part of the Lee Valley Regional Park, owned by the Lea Valley Regional Park and designated area of Metropolitan Importance for Nature Conservation (SMINC). According to the Council's definitions another type of strong boundary is a Protected Park, for which the Council defines as 'MOL, playing fields, allotments, cemeteries, local parks and amenity greenspace'. It is considered that the designated SMINC would fall under this definition and should be deemed a strong boundary.</p>	<p>encroachment onto the open land and also to amend the boundary on its western side to ensure flexibility and to facilitate access to the road for statutory undertakers.</p> <p>The eastern edge of Harbet Road has the least number of breaks and provides an almost linear route along the road to the river. Conversely, the western side of the road heavily relies on the buildings in situ, which have no statutory protection from demolition, leaving the Green Belt boundary weak.</p> <p>The proposed boundary is therefore considered to be the most strong, enduring and easily recognisable.</p>
Email	35a	LB Haringey	Sara Dilmamode	The emerging policy approaches are supported.	Comments noted.
Email	36a	Planning Potential on behalf of National Grid	Alister Henderson	DMD 4: Environmental Assessment Methods (non-residential): The policy by using the word "must" does not allow sufficient flexibility when building units speculatively. If the end occupier is unknown it	DMD 50 text amended to take into account issues of technical feasibility and economic viability.

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				becomes difficult if not impossible to meet with BREEAM standards because of the number of credits attached to 'fit-out' of the various different types of units.	
Email	36b	Planning Potential on behalf of National Grid	Alister Henderson	DMD 5: Affordable Housing: support approach to negotiating tenure mix.	Comments noted.
Email	36c	Planning Potential on behalf of National Grid	Alister Henderson	DMD 13: Amenity Space Using the word 'must' does not allow sufficient flexibility. The words "unless it is not technically feasible to do so" should be inserted.	No change to DMD 9. Minimum standards have been based on a study looking at the requirements of occupiers in order to maximise capacity for housing development, while ensuring suitable forms of development. The standards for flatted development are also consistent with the London Housing Design Guide. The proposed standards are significantly less than current adopted standards in the Unitary Development Plan.
Email	36d	Planning Potential on behalf of National Grid	Alister Henderson	DMD 20: Community Facilities: Supported	Comments noted.
Email	36e	Planning Potential on behalf of National Grid	Alister Henderson	DMD 46: Parking Standards: Support the wording of policy with regard to parking standards. Require further clarification and detailed explanation on what DMRB relates to or alternatively suggest adding text which refers to new accesses proposed on A and B classified roads.	No change to DMD 45. The section of the DMRB that DMD48 refers to is Volume 6, Section 2, Part 7, TD41/95. The decision to apply these standards to all roads with a limit above 40mph (as opposed to A and B Classified Roads) was made because the characteristics for each individual road, despite their classification, do vary considerably and will require the application of the most appropriate

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					(but sometimes different) standards.
Email	37a	Quod Planning on behalf of Dwyer Asset Management Plc	Philip Murphy	DMD 31 and 32: District and Local Centres: Dwyer have commissioned independent research for retail development in Meridian Water and consider that the data , once available, should inform DMD31 and 32.	Comments noted. No data provided to date.
Email	38a	Herts & Middx Wildlife Trust	Odette Carter	Herts & Middlesex Wildlife Trust is pleased to see that the draft Development Management policies document is strongly grounded in the three pillars of sustainability on which the NPPF centres, including a necessary strong focus on environmental sustainability.	Comments noted.
Email	38b	Herts & Middx Wildlife Trust	Odette Carter	Support clear policies for making development more environmentally sustainable (e.g. draft DMD policies 50 69 and 70 to 81), supported by strong justification and additional detail in the text. The cross referencing to the Core Strategy Policies also helps bind the local plan together.	Comments noted.
Email	38c	Herts & Middx Wildlife Trust	Odette Carter	HMWT is keen to emphasise that an ecosystem approach to environmental management and planning and landscape-scale approach to nature conservation can help to deliver multiple benefits across the environmental, social and economic domains. This perspective is enshrined in the Wildlife Trusts' Living Landscapes vision. We would encourage the council to be open to and proactively seek innovative approaches and solutions which can deliver multiple benefits	Comments noted.

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				locally.	
Email	38d	Herts & Middx Wildlife Trust	Odette Carter	DMD 70: Green Infrastructure: We support this policy, and in particular welcome the fact that applicants must demonstrate that consideration has been given to all the points listed, rather than only certain components. It should be ensured that Green Infrastructure is planned to deliver multiple, interlinked goals.	Policy removed and requirements incorporated into policy DMD 49: Sustainable Design and Construction Statements (as detailed in Appendix 3).
Email	38e	Herts & Middx Wildlife Trust	Odette Carter	Paragraph 11.0.2: HMWT support the use of the Green Infrastructure Checklist.	Policy removed and requirements incorporated into policy DMD 49: Sustainable Design and Construction Statements (as detailed in Appendix 3).
Email	38f	Herts & Middx Wildlife Trust	Odette Carter	DMD 78: Nature Conservation: Support recognition of non-designated sites as well as designated site. Local Sites (i.e. Sites of Importance for Nature Conservation) are a critical part of the local ecological network, and should be protected from adverse impacts of development. The ecological interest and value of many local sites depends on ongoing, appropriate management, so it is important that policies encourage and require positive conservation management of these sites. Similarly, it is important for policy to encourage the expansion and reconnection of existing sites, through habitat restoration and creation, in order to strengthen the ecological network and reverse fragmentation.	Comments noted.

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Email	38g	Herts & Middx Wildlife Trust	Odette Carter	DMD 71: Open Space: Urge the council to consider the impact that loss of open space can have beyond simply loss of community recreation space. Adverse impacts may include reduced ecological connectivity, reduced potential for habitat and ecological network improvement, reduced potential to adapt to climate change (e.g. through urban cooling), potentially negative impacts for surface water management, flood alleviation and water quality, and so on.	DMD 71 (paragraph 10.1.1) text amended to include other impacts.
Email	38h	Herts & Middx Wildlife Trust	Odette Carter	DMD 71: Open Space: Support the Council requirement for re-provision of lost open space of better quality and in the same locality.	Comments noted.
Email	38i	Herts & Middx Wildlife Trust	Odette Carter	DMD 71: Open Space (paragraph 11.1.1): <ul style="list-style-type: none"> • Pleased to see that the paragraph clarifies that classifying open space as ‘surplus to requirements’ should include consideration of all the functions that open space performs. It is important that the wider functions are given sufficient weight. It might be beneficial to provide a list of these functions. • Should emphasise that open space is important in the urban context, for health and wellbeing, recreation, urban cooling, climate change adaptation/resilience and can be important for wildlife depending on how well it is managed. • Should consider how the multi- 	Comments noted.

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				functionality of open space can be improved, for instance through positive management, habitat enhancements or creation, or other actions targeting, for instance, public access, recreation, outdoor learning etc.	
Email	38j	Herts & Middx Wildlife Trust	Odette Carter	<p>DMD 75: Waterways: Generally support the ‘waterways’ segment of this policy, and its encouragement of proactive management of river corridors as an environmental resource (multiple functions). Encourage the Council to be clearer or give more emphasis to naturalising and restoring for wildlife/environmental benefit river margins.</p> <p>Paragraphs 11.4.1-3: HMWT supports the biodiversity and ecology angle and prominence given to Enfield’s waterways. It is good to see links made in the policy document with the Blue Ribbon Network scheme and policies in the London Plan. We are also pleased to see reference made to Water Framework Directive policies and objectives. HMWT supports the refocusing on the role of waterway networks, as a way to link up the Borough internally (in a physical and conceptual sense), and ensure coherence across borough and area boundaries. Waterways provide a logical, rational framework to bring together inter-linked sustainability goals.</p>	Comments noted. DMD 75 and 76 continue to provide guidance on waterways and wildlife corridors.

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Email	38k	Herts & Middx Wildlife Trust	Odette Carter	<p>DMD 76: Wildlife Corridors: HMWT welcome this policy and its requirement for development proposals to demonstrate how wildlife corridors will be protected and enhanced. Recommend the Council extends this policy to cover 'stepping stones', i.e. habitat patches situated close enough to each other to allow certain species to move and move between more ecologically valuable.</p> <p>Suggested revision: "wildlife corridors are continuous strips of wildlife habitat, connecting larger areas of habitat and allowing wildlife to move through an impermeable area, such as the built environment".</p>	<p>DMD 76: The Policies Map identifies wildlife corridors for which this policy applies, some of these designated areas have breaks in them. DMD 76: Wildlife Corridors (paragraph 10.5.1) definition of wildlife corridor has been amended.</p>
Email	38l	Herts & Middx Wildlife Trust	Odette Carter	<p>DMD 77: Green Chains: Welcome the requirement in this policy for developments within 400 metres of 'Green Chains' to look to integrate sites with the Green Chain, and also observe the principles in the GI policy. Further guidance requested on its implementation. Welcome the encouragement to strengthen the ecological network in terms of structure, role and function.</p>	<p>DMD 77 seeks to ensure that new development integrates with the existing network and does not have any adverse impact. The focus of the policy is on public accessibility. Also see response to</p>
Email	38m	Herts & Middx Wildlife Trust	Odette Carter	<p>DMD 77: Green Chains: HMWT would like to see more of an ecological focus in the definition of 'Green Chain' given in this paragraph, which is focused more on public.</p>	<p>Comments noted. The borough has SINC and Wildlife Corridors which are specifically focussed on ecology. The main thrust for Green Chains is to promote the route for pedestrians and cyclists. However, the policy acknowledges the role as</p>

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					ecological greenway for migration.
Email	38n	Herts & Middx Wildlife Trust	Odette Carter	<p>DMD 78: Nature Conservation:</p> <ul style="list-style-type: none"> • HMWT strongly welcomes the commitment to protect and enhance biodiversity through the planning process, including protecting and enhancing existing important features; seeking biodiversity enhancements in new development; and seeking opportunities to improve access and appreciation of nature. • Policy should also require that any mitigation or compensation to offset any residual harm is sufficient. This often means more than like-for-like replacement. • The policy needs to go further, and state clearly that proposals that fail to avoid harm and fail to provide sufficient mitigation for any residual harm to nature conservation interests, will be refused. This is in compliance with paragraph 118 of the NPPF. 	<p>Comments noted. Core Strategy Policy 36 and DMD 78 and 79 seek to protect and enhance biodiversity.</p> <p>DMD 78 states that ‘development will only be permitted’ if any negative harm is mitigated, in accordance with the NPPF.</p>
Email	38o	Herts & Middx Wildlife Trust	Odette Carter	<p>DMD 78: Nature Conservation:</p> <p>Paragraph 113 of the NPPF requires LPAs to “set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with</p>	<p>Comments noted. Additional text in DMD 78 (paragraphs 10.6.2-10.6.3) to indicate the hierarchy in accordance with the NPPF.</p>

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				their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.”	
Email	38p	Herts & Middx Wildlife Trust	Odette Carter	DMD 78: Nature Conservation HMWT is pleased to see SINCs and BAP habitats (identified in UK, London as well as Enfield Biodiversity Action Plans) incorporated in the Council’s definition of ‘important ecological features’. It is good also to see ancient woodland and veteran trees listed. We would point out that BAP habitats and species are listed several times.	Comments noted.
Email	38q	Herts & Middx Wildlife Trust	Odette Carter	DMD 78: Nature Conservation (paragraph 11.6.2): Welcome the need for schemes to demonstrate how features listed have been incorporated into scheme designs and where possible enhanced. Applicants should give an indication or provide a plan showing how such habitats will be actively managed to maintain ecological interest. Without positive management, many habitats will decline and lose their ecological interest.	Text amended to include the need show how habitats will be appropriately managed.
Email	38r	Herts & Middx Wildlife Trust	Odette Carter	Paragraph 11.6.10: <ul style="list-style-type: none"> it would be useful to include text references and links to newer policy developments in the area of biodiversity and nature conservation, including the Natural Environment White Paper (June 2011), the National Ecosystem 	Text amended. Reference to All London Green Grid SPG included in supporting text of DMD 72: Open Space provision.

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				<p>Assessment and the Lawton Review on which much of the White Paper is based.</p> <ul style="list-style-type: none"> It is also advised to link the DMD to strategic GI and nature conservation plans, such as the All London Green Grid. This would ensure that the DMD is sound and well integrated with new policies and strategies relevant in the area. 	
Email	38s	Herts & Middx Wildlife Trust	Odette Carter	<p>DMD79: Ecological Enhancements: This policy is welcomed. HMWT is pleased that it also applies to relatively small scale development (i.e. 1 net additional dwelling or 100 sq m floorspace). It is positive to see specification that applicants must demonstrate their compliance with this policy as part of the Sustainable Design & Construction Statement. HMWT supports the points made in this paragraph. A case-by-case approach needs to be taken, to considering what options are available and most fitting to a particular site, and in order that particular features of value are maintained and enhanced within any scheme.</p>	Comments noted.
Email	38x	Herts & Middx Wildlife Trust	Odette Carter	<p>DMD80: Trees: Support the inclusion of this policy.</p>	Comments noted.
Email	38w	Herts & Middx Wildlife Trust	Odette Carter	<p>DM81: Landscaping: Support the inclusion of this policy. However, it must be taken into account that certain species will be more appropriate in certain contexts, depending on the local habitat and landscape character. We welcome policy</p>	Comments noted.

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				favouring the use of native species. In some instances, it will be entirely inappropriate to plant non-native species. This should be considered in decisions and in landscaping proposals.	
Email	38v	Herts & Middx Wildlife Trust	Odette Carter	DMD 82 HMWT's concern is that nature conservation interests are not adversely affected or ecological connectivity inhibited by proposed developments in the Green Belt. It is positive to see points d) and e) within policy DMD82, and the requirement that a management plan should be submitted. Management plans should aim to deliver gains for biodiversity and nature conservation.	Comments noted.
Email	39a	Savills on behalf of Legal & General and National Grid	James Armitage Hobbs	DMD 1: Achieving High Quality and Design-Led Development: The redevelopment of the Western Gateway site will bring about a high quality scheme which will vastly improve the character and appearance of the area. The removal of the gas holders and existing retail stores will improve the character and appearance of the site and the wider area. In accordance with DMD 1: Achieving Hgh Quality Design-led development:- the proposed redevelopment will create a place with its own identity that makes a positive contribution to quality of life.	Comments noted. Any application for this site will be assessed against DMD37 (and other relevant policies including those in the North Circular Area Action Plan) by the Development Management case officer.
Email	39b	Savills on behalf of Legal & General and	James Armitage Hobbs	DMD 5: Affordable Housing on Sites Capable of Providing 10 units or more The policy requirement to achieve the	DMD1 in conjunction with Core Strategy policy 3, provides sufficient flexibility with regards to feasibility and viability issues. Any application for

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		National Grid		<p>borough wide affordable housing target of 40% should include some flexibility in terms of ensuring that developments are financially viable. There are key issues which limit the options for providing a financially viable development, these are set out below:</p> <ul style="list-style-type: none"> • Contamination issues. • The Homebase and Topps Tiles are relatively valuable and need to be displaced. • Residential values are not significant in this area. • The immediate proximity of the north circular. • The design restraints caused by the builder's yard and railway embankment places significant constraints on the form and layout of development. 	the site will be assessed against DMD 1 (and other relevant policies including those in the North Circular Area Action Plan) by the Development Management case officer.
Email	39c	Savills on behalf of Legal & General and National Grid	James Armitage Hobbs	<p>DMD10:Residential Character: Support paragraph 3.4.3 acknowledging that larger developments in areas of indeterminate character such as the Western Gateway site have the ability to create their own setting and therefore higher density may be permitted where they are justified and can be considered within the context of wider masterplan/planning framework for the area.</p>	Comments on DMD6 noted. The character of the Western Gateway site will be assessed through any planning application of the site.
Email	39d	Savills on behalf of Legal & General and National Grid	James Armitage Hobbs	<p>DMD29: New Retail and Leisure Development: Not consistent with the National Planning Policy Framework. The policy states that main</p>	<p>DMD 25 is considered to comply with the NPPF.</p> <p>Any application for the site will be assessed against this policy (and other relevant policies</p>

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				<p>and bulk convenience goods, comparison goods and major leisure development proposed outside Enfield Town centre, the main four district centres and the Council's retail parks will not be permitted. There is no flexibility to consider out of centre retail or leisure development on appropriate sites. The NPPF states that:</p> <p><i>Local planning authorities should... require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.</i></p> <p>The Core Strategy states that depending on the implementation of other foodstore proposals near the Borough boundary there may be a requirement for food store development between the period 2015-2020. Furthermore, the Council's Retail Study states that "<i>higher population growth within the SGA's (medium or high) could generate scope for food store development between 2020 and 2025, particularly in the Southgate area.</i>"</p> <p>In a relatively dense area such as Enfield there are limited opportunities for foodstore development in sequentially preferable locations (the Retail Study identified very few such opportunities) and a foodstore could not realistically be accommodated in vacant retail</p>	<p>including those in the Core Strategy and North Circular Area Action Plan) by the Development Management case officer.</p>

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				units or infill development. Whilst the Western Gateway site is not within or on the edge of a town centre, it is well related to New Southgate station (and 'small local centre' as identified in your Core Strategy) and is in existing retail use. The Western Gateway is clearly a highly sustainable location. The aforementioned factors combine to suggest that the policy should be amended to accord with the NPPF and allow some flexibility in terms of meeting anticipated retail need.	
Email	39e	Savills on behalf of Legal & General and National Grid	James Armitage Hobbs	<i>Draft DMD 44 Tall Buildings</i> The site is not located in a sensitive area in terms of heritage designations or neighbouring land uses. Therefore, the density and bulk of development should be maximised.	Noted that the respondent does not propose any changes to the policy (DMD43).
Email	40a	On behalf on Mobile Operators Association	Carolyn Wilson	Important that a telecommunications policy remains in place within the LDF. Suggest telecommunications policy wording to be included within the DMD.	No change. The National Planning Policy Framework (NPPF) includes detailed policy guidance on supporting high quality communications infrastructure, including telecommunications.
Email	41a	On behalf of Hadley Property Group Ltd	Chris Pittock	DMD 82: Green Belt: Paragraph 12.1.3 fails to acknowledge all of the appropriate categories of development in respect of Green Belt Land and is not in conformity with the relevant provisions of the NPPF. Policy should be amended to include: The development involves limited infilling or the partial or complete redevelopment of	DMD 82 (paragraph 11.1.1) text amended. References to appropriate development have been deleted and replaced with cross references to the NPPF. This policy should also be read alongside other policies in the chapter including DMD 89.

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				previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development;	
Email	42a	Highways Agency	Patrick Blake	Reviewed the consultation and no comment at this time.	Comments noted.
Email	43a	Metropolitan Police	Vanessa Garner	DMD 4: Environmental Assessment Methods: For policing facilities the expectation to achieve BREEAM Excellent or higher is too onerous and the Policy should go further and set out exceptional circumstances e.g. to take into account delivery of essential public social and community buildings and services in relation to refurbishment, change of use and conversion in particular.	Text has been added to DMD 50 to clarify that technical feasibility and economic viability is applicable to all parts of the policy. Exceptional circumstances are specific to individual proposals/sites and therefore it would be difficult and inappropriate to specify all of these in a policy.
Email	43b	Metropolitan Police	Vanessa Garner	Community Facilities (paragraph 4.1.3): Support the inclusion of Emergency Services and policing facilities in the list of examples of community facilities.	Comments noted.
Email	43c	Metropolitan Police	Vanessa Garner	DMD:20 Provision of New Community Facilities: Policy states that new community facilities should be accessible to the community they are intended to serve by walking, cycling and public transport to reduce dependence upon private car transport. Object to this because some policing facilities, e.g. patrol bases, with no front counter, are not required to be located in areas where they can be accessed	DMD 16, paragraph 3.1.5 added.

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				by the public. An exception should be made.	
Email	43d	Metropolitan Police	Vanessa Garner	DMD 23:Appropriate Uses in SIL: Policy indicates that no other uses such as Sui Generis are appropriate, yet MOPAC/ MPS have identified the potential of relevant employment space to meet provision of patrol bases, custody centres and pan-London policing facilities. The nature of these uses is similar to that carried out on most industrial sites and therefore are ideally suited to light industrial land.	DMD 19 is considered to be in accordance with the London Plan and refers to the types of uses appropriate for SIL rather than use classes. Any applications for patrol bases or custody centres will be assessed against this policy (and any other relevant policies, including London Plan policies) by the Development Management case officer.
Email	43e	Metropolitan Police	Vanessa Garner	DMD: 29 New Retail and Leisure: Support part 2 of the policy which states that proposals for other community uses of a scale which provides local shopping facilities and services for local services will be permitted within the boundaries of local centres.	Comments on DMD 25 noted.
Email	43f	Metropolitan Police	Vanessa Garner	DMD 46: Parking Standards: Support as in accordance with the London Plan paragraph 6A10 of the parking addendum to Chapter 6 which states provision for parking at ambulance, fire and policing facilities should be assessed on their own merits.	Comments noted.
Email	43g	Metropolitan Police	Vanessa Garner	Appendix Design Considerations: Support the inclusion of Safer Places and Secured by Design in the list of guidance documents.	Appendix removed. Referenced provided in DMD 37.

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Email	44a.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	<p>DMD 4: Environmental Assessment Methods:</p> <ul style="list-style-type: none"> • Overlap between time periods for Code for Sustainable Homes standards. Question the need for the target to be from 2011-2015, as the likely adoption date is only 2013, so the period should be from 2013 to 2015. The target from 2011 to 2015 to exceed Code Level 4 would require applicants to demonstrate Code Level 5. • Part 2 residential refurbishments and conversions does not recognise that each application should be dealt with on a case by case basis. Should have regard to viability and provide flexibility in these uncertain economic times if standards cannot be met. • Support the inclusion of the flexibility in terms of exceptional circumstances in part 1b and urge this to be incorporated into parts 1a, 2a and 2b. 	<p>Text amended in DMD 50 to update the time period and to clarify the requirements. The relevant Code Level is the starting point for negotiations, but the Code is a sliding scale and exceedance may mean an increase in credit yield rather than Code rating.</p> <p>Text added to clarify that technical feasibility and economic viability is applicable to all parts of the policy.</p>
Email	44b.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	<p>DMD 4: Environmental Assessment Methods:</p> <ul style="list-style-type: none"> • Paragraph 2.2.7 – The need for a design stage assessment potentially opens developers up to unnecessary financial risk (such as abortive design work and consultancy fees if design does not receive consent) and detailed designs for certain aspects of the build are not necessarily complete at this stage. • Post construction assessment is a long process therefore, should remove “and 	<p>DMD 50 (paragraph 8.1.5) only requires a design stage assessment if planning permission has been granted. Text has been amended to clarify that a post construction assessment will be required “prior to first occupation unless otherwise agreed”.</p>

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				prior to first occupation” in order to allow greater flexibility for developers following the completion of a build.	
Email	44c.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 4: Environmental Assessment Methods: Paragraph 2.2.6 – should permit certain level of flexibility on demonstrating how levels of sustainable development will be met to reduce overbearing costs for the developer. Amend wording: “The developer should demonstrate how the relevant Level of the Code for Sustainable Homes or category of BREEAM assessment will be met through the submission of a pre-assessment to accompany the application where appropriate ”	No change to DMD 50. A pre-assessment is required for all relevant applications.
Email	44d.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 5: Affordable Housing: Agree with principle of well integrated cohesive mixed tenure residential development proposals, have concerns over management issues. Would like clarification on how to manage issues that arise from integration of different tenures.	The policy (DMD 1) does not prescribe how tenure should be integrated which allows for appropriate solutions to be developed on a site by site basis.

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Email	44e.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 3: Sustainable Design and Construction Statements: Support flexibility towards the Council's validation list. This allows flexibility so that Council can assess the required criteria for an application on a case by case basis.	Comments noted. Reference in DMD 49 to items on the Local Validation List has been removed, however, the policy still sets out requirements for planning applications, including the submission of a Sustainable Design and Construction Statement.
Email	44f.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 6: Affordable Housing: Does not provide an opportunity for an applicant to deliver potentially a lower target if it can be demonstrated that it would not be viable for the proposals to come forward if such a target were unachievable.	DMD 6, paragraph 2.1.8 amended to include a reference to viability.
Email	44g.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 7: Providing a Mix of Different Sized Homes: Support the design led approach to maximising the provision of family units.	Comments on DMD 3 noted.
Email	44h.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 10: Residential Character: Criteria (e) should be subject to further scrutiny, as it is possible to offset the impact of development with the provision of social infrastructure as part of Section 106 agreement. Should recognise that new development is a fundamental contributor of this provision.	DMD 5 amended to include a reference to both 'existing and planned provision of local facilities'.
Email	44i.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 27: Loss of Industrial and Employment Capacity Outside Designated SIL and LSIS: <ul style="list-style-type: none"> Encouraged to see flexibility towards the potential loss of industrial and employment capacity outside designated SIL and LSIS areas if it can be demonstrated by the 	No change to DMD 22. Viability assessments are referred to in the justification section of this policy (paragraph 4.5.3). Section 4.6 'market demand and viability assessments' and Appendix 13 to address this issue.

Appendix D: Summary of Consultation Responses on **the Draft Development Management Document (DMD)**
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Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
				<p>applicant that an industrial use is vacant and under no demand</p> <ul style="list-style-type: none"> Policy should include commentary on the economic viability of retaining employment land to consider that where there is no reasonable prospect of the site being used for the allocated use then alternative applications should be treated on their merits having regard to market signals and the relative need for different land uses. 	
Email	44j.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 46: Parking Standards: Support the wording of policy with regard to parking standards.	Comments on DMD 45 noted.
	44k.		Stuart Slatter	<p>DMD 48: Access and Servicing</p> <ul style="list-style-type: none"> Require further clarification and detailed explanation on what DMRB relates to or alternatively suggest adding text which refers to new accesses proposed on A and B classified roads. 	No change. The section of the DMRB that DMD48 refers to is Volume 6, Section 2, Part 7, TD41/95. The decision to apply these standards to all roads with a limit above 40mph (as opposed to A and B Classified Roads) was made because the characteristics for each individual road, despite their classification, do vary considerably and will require the application of the most appropriate (but sometimes different) standards.
Email	44l.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	Chapter 9: Tackling Climate Change: Still references to PPS25 which has been replaced by NPPF therefore should be removed/corrected.	Text amended in chapter 8. References to PPS25 have been removed.

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(May – August 2012)**

Type of Response	Reference	Respondent	Name	Summary of Representation on Draft DMD (Please note policy references refer to Draft DMD 2012)	Response and changes made to the Proposed Submission DMD (please note policy references in this column refer to those in the Proposed Submission DMD)
Email	44m.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 60: Sustainable Drainage Systems: Table 9.3 – would like to row 2 under ‘Measures Required’ to include a new paragraph following “or” which states “minimum control flow rate of 5L/S to avoid outfall controls not being prone to blockage”. This sentence should also be included within the Critical Drainage Area row.	The table has now been removed and policy text in DMD 61: Managing Surface Water has been revised. In line with the London Plan, the policy now requires all major development to achieve greenfield run off rates and all other development should seek to achieve this.
Email	44n.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 64: Air Quality: Agree with principle of seeking planning contributions towards air quality measures. However, should consider the improvement in air quality in circumstances where an incoming use would have a lesser impact on the natural environment than the previous use (i.e. proposed residential use on an industrial/commercial site). This could negate the need for financial contributions.	No change to DMD 65. The London Plan defines ‘air quality neutral’ therefore development will be required to meet and will be assessed against this definition.
Email	44o.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 65: Land Contamination (paragraph 10.2.6): There are significant cost and time implications associated with the treatment of contaminated soil. It also requires significant space to implement in situ remediation. Welcome flexibility in approach.	Comments on DMD 66 noted.
Email	44p.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 66: Hazardous Installations: LAs are required to review proposals for removal of hazardous installations at a local level, significantly speeding up the provision of advice for potential developers. Health and Safety Executive (HSE) guidance provides the	No change to DMD 67. Paragraph 9.3.3 states that the advice of the HSE will be sought when appropriate, and acknowledges that HSE standing advice is available.

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				capacity for Authorities to determine decisions against the proposed development.	
Email	44q.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 67: Noise More appropriate for developments to meet British Standards 823:1999 standards rather than Mayor's Sustainable Design and Construction Supplementary Planning Guidance.	DMD 68 amended. References to Mayor's Sustainable Design and Construction SPG in the policy have been removed.
Email	44r.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 67: Noise: Table 10.1 includes noise levels taken from PPG24, which is now superseded by NPPF which does not include such limits. Criteria set by British Standards 823:1999 and World Health Organisation would be appropriate and acceptable method of assessment for proposed residential development sites.	Table has been removed from DMD 68.
Email	44s.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	DMD 82 (Green Belt) and 84 (Area of Special Character): Support the protection of the Green Belt where justified. However concerns over the criteria used to place sites within the Green Belt boundary and Areas of Special Character.	No change. Justification for inclusion of sites in designated areas referred to is provided in the evidence base which supports the DMD.
Email	44t.	Planning Potential on behalf of Fairview New Homes	Stuart Slatter	Policies Map (Green Belt designation): Previous representations submitted in 2011 on behalf of Fairview requesting the de-designation of Enfield Road are still considered relevant.	No change. This representation relates to the release of the large expanse of open green belt area south of Enfield Road. The current green belt boundary in this location is well defined. The site is a large open field that upholds the aims of the Green Belt policy.
Email	44u.	Planning Potential on	Stuart Slatter	DMD 83: Urban Fringe: Agree with wording of policy, and consider	Noted that the respondent does not recommend changes to the DMD policy (DMD 83:

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		behalf of Fairview New Homes		that none of these criteria are contravened when examining the land at Enfield Road as there is a clear boundary distinction made by the A110, Enfield Road.	Development Adjacent to the Green Belt).
Email	45a	CgMs on behalf of Notting Hill Housing	Matthew Brewer	<p>DMD 1: Achieving High Quality Design Led Development:</p> <ul style="list-style-type: none"> The policy should include references to potential innovation in design. In appropriate locations, developments which deliver a change to the character of an area should not be resisted in principle, where they would assist in developing a new sense and character of place. The NPPF states that developments should optimise the potential of the site, and whilst they should respond to local character and reflect the identity of local surroundings, it highlights that planning policies should not prevent or discourage appropriate innovation. 	<p>DMD 37 is flexible enough to allow innovative/contemporary design, and this is specifically discussed in 6.1.4.</p> <p>DMD 8: Residential Density covers optimisation of sites and notes that “larger developments in areas of indeterminate character have the ability to create their own setting and therefore higher density may be permitted where they are justified and can be considered within the context of wider masterplan/planning framework for the area”.</p>
Email	45b	CgMs on behalf of Notting Hill Housing		<p>DMD 2: Design Process:</p> <p>This policy sets out requirements related to the validation of documents which should not in itself form a planning policy within the DMD, but should instead be included in the local validation requirements.</p>	No change to DMD 38. The policy is designed to assist developers by communicating requirements of the design process at an early stage. This should avoid delays at submission. The preparation of the Design and Access Statement is an important part of the development management process.
Email	45c	CgMs on behalf of Notting Hill Housing	Matthew Brewer	<p>DMD 3: Sustainable Design and Construction Statements:</p> <p>This policy sets out requirements related to the validation of documents which should not</p>	Text amended in DMD 49. Reference to items on the Local Validation List has been removed, however, the policy still sets out requirements for planning applications, including the submission

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				in itself form a planning policy within the DMD, but should instead be included in the local validation requirements.	of a Sustainable Design and Construction Statement.
Email	45d	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 3: Sustainable Design and Construction Statements: A Sustainable Design and Construction Statement may not be relevant to all applications.	No change to DMD 49. A Sustainable Design and Construction Statement is relevant to all applications, the scale and scope of information required would depend on the specific proposals.
Email	45e	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 4: Environmental Assessment Methods: In relation to new build residential development (a) major development: necessary flexibility is required to be included where it can be demonstrated that the proposed levels of Code for Sustainable Homes can not be met due to technical feasibility or viability, to ensure development on sites is still deliverable.	Text for DMD 50 amended to clarify that technical feasibility and economic viability is applicable to all parts of the policy.
	45f	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 5: Affordable Housing: The target of a 70:30 rent/intermediate split is not consistent with the London Plan which sets a 60:40 split.	The target is set out in the adopted Core Strategy. DMD 1 (paragraph 2.1.5) added to advise that in some locations 60:40 split would be appropriate.
Email	45g	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 5: Affordable Housing: In relation to the final paragraph of this policy, whilst the provision of mixed tenure schemes and tender blindness through external design is supported, from a management and viability point of view, we do not support the provision of tenure types being split up within development.	No change to DMD 1. Policy includes sufficient flexibility. It does not prescribe how tenure show be integrated which allows for appropriate solutions to be developed on a site by site basis.
Email	45h	CgMs on behalf of Notting Hill	Matthew Brewer	DMD 5: Affordable Housing: In line with the current proposed changes to	Affordable Rent is still referenced in DMD 1 because the National Planning Policy Framework

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		Housing		the London Plan, planning should not concern itself with Affordable Rent.	includes it as a category of Affordable Housing, and local planning authorities are required to plan to meet the need for affordable housing.
	45i	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 5: Affordable Housing (paragraph 3.1.5): This paragraph is overly restrictive and could adversely affect the delivery of housing and Affordable Housing in the borough.	DMD 1: Affordable Housing and the supporting text in the Housing chapter have been amended. Some of the more detailed information on the Affordable Rent Tenure (ART) has been removed because it was recognised that some of this was too detailed. Changes have also been made to ensure conformity with anticipated changes to the London Plan. The key considerations in terms of ART remain, particularly the need to provide affordable family homes.
Email	45j	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 6: Affordable Housing on Sites of less than 10 units): <ul style="list-style-type: none"> The policy should provide necessary flexibility where the required level of provision of affordable housing is not demonstrated to be viable. In addition, the potential for the required level of affordable housing to be provided through alternative means, i.e. Direct provision on an alternative site in proximity to the development, should be referred to in the policy. 	DMD 2, in conjunction with Core Strategy policy 3, provides sufficient flexibility with regards to feasibility and viability issues. Paragraph 2.1.7 has been amended to refer to the potential for alternative provision.
Email	45k	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 7: Providing a Mix of Different Sized Homes: The policy should include references to the potential technical and physical constraints on specific sites, which may limit the	No change to DMD 3. Technical and physical constraints may not be relevant on all sites, however the guidance on implementation in paragraphs 2.2.4 and 2.2.6 sets out developers must demonstrate why they cannot achieve

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				opportunities to secure the required levels of family sized accommodation, as well as to the character of existing housing in an area, rather than just the development in isolation. In some instances it may be preferable to provide an alternative mix of unit sizes to respond to site constraints or ensure a more appropriate mix over a wider area, and the policy should reflect this.	targets and will take into account the specific nature of the site such as its location and its overall suitability for different housing types. DMD 6 takes into account existing character when assessing appropriate density levels.
Email	45l	CgMs on behalf of Notting Hill Housing	Matthew Brewer	Chapter 3: Affordable Housing (Box 3: Affordable Rent Levels): Whilst the information contained in Box 3 is provided as information only, due to the way it is presented, and as the position is regularly changing in relation to rent levels and service charge etc., it is considered that this should not be included within this planning policy document. The rental levels quoted are misleading as they do not take service charges into account and are not truly comparable.	Table deleted.
Email	45m	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 7: Providing a Mix of Different Sized Homes (paragraph 3.2.5): Flexibility in the provision of specific unit types and sizes should be included to ensure that proposals can respond appropriately to meet requirements. For example suggested welfare reforms may result in less need for larger affordable rent family units and as such flexibility should be built in to ensure policies can respond as required.	No change. DMD3 and the supporting text provide sufficient flexibility with regards to achieving an appropriate mix on a site by site basis. Guidance on implementation in paragraphs 2.2.4 and 2.2.6 sets out developers must demonstrate why they cannot achieve targets.

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Email	45n	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 7: Providing a Mix of Different Sized Homes (paragraph 3.2.8): These conditions could also apply to other developments not just estate renewals.	Paragraph 2.2.5 refers to estate renewal schemes which involve the regeneration of existing estates with higher proportions of affordable housing and different tenure balance to the targets specified in the Core Strategy and reiterated in the DMD. The text acknowledges that, to take account of the potential need to re-provide for existing affordable housing tenants, their redevelopment may not accord with boroughwide targets.
Email	45o.	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 10: Residential Character: <ul style="list-style-type: none"> Whilst the scale and form of new development should take account of the existing form of development, the policy should also enable developments in regeneration areas to provide innovative schemes that deliver a step-change, to assist in developing a new sense and character of place. Paragraph 3.4.3 – The preparation of AAPs to support the development of vacant or under-utilised sites is supported. 	No change. DMD 6 and paragraph 2.4.3 addresses this point.
Email	45p	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 11: Development of Garden Land: The potential for the development of garden sites to deliver improvements and benefits, such as improved overlooking and security to existing back alleyways and improvements to the quality of the environment to the rear of dwellings, to overcome the normal presumption against new residential development on garden land should also be	No change. Development would also be required to satisfy the criteria in DMD8 which considers issues such as overlooking.

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				identified in this policy.	
Email	45q	CgMs on behalf of Notting Hill Housing	Matthew Brewer	<p>DMD 13: Amenity Space:</p> <ul style="list-style-type: none"> • Flexibility should be provided in the wording of the policy where appropriate schemes are not able to meet the requirements, but provide amenity space of a suitable quality and function. • In addition, the policy should include the potential for schemes to make contributions towards open space provision/improvements in the local area where appropriate development schemes cannot include the required amenity space on site, in line with Policies DMD72 & 73. 	No change. Minimum standards have been based on a study looking at the requirements of occupiers in order to maximise capacity for housing development, while ensuring suitable forms of development. The standards for flatted development are also consistent with the London Housing Design Guide. The proposed standards are significantly less than those in the Unitary Development Plan. There is some degree of flexibility to provide a range of garden sizes, as an average and minimum standard is being applied.
Email	45r	CgMs on behalf of Notting Hill Housing	Matthew Brewer	<p>DMD 14: Distancing:</p> <ul style="list-style-type: none"> • The BRE standards in relation to distances between rear facing windows set a minimum separation distance of 18 metres. It is considered that this would be a more appropriate requirement for this policy. • The policy should also recognise that the potential impact that can arise between properties in closer proximity than set out in table 3.4 can in some cases be mitigated through design. • In relation to (b) the policy should also identify the opportunity to relax the distance requirements where the nature of the levels decreases the potential for overlooking. 	DMD 10 has sufficient flexibility to ensure adequate distancing.

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Email	45s	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 20: Provision of New Community Facilities: This policy should identify the potential to provide small scale facilities in appropriate locations outside of existing centres.	No change to DMD 16. The policy supports community facilities which are located in sustainable, accessible locations. It is considered that the policy wording is appropriate.
Email	45t.	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 28: Small Businesses: The final three criteria in terms of impact on amenity, character of the area and traffic are dealt with in other detailed policies of the document, which would be relevant to the determination of any application, and therefore these requirements are duplicated and should be removed from the wording.	Text amended for DMD 24. The policy on small business has been amended to remove duplicated wording.
Email	45u.	CgMs on behalf of Notting Hill Housing	Matthew Brewer	DMD 44: Tall Buildings: <ul style="list-style-type: none"> • The approach to considering the suitability of proposals for tall buildings in relation to the context of the each site and details of the proposed building is supported. The potential for tall buildings in regeneration areas is also supported. • It is considered that the order of the policy should be amended, with the criteria where tall buildings may be appropriate included first. • The criteria should acknowledge the potential for tall buildings where they can develop a new sense and character of place in regeneration areas. • In terms of the additional requirements listed under (2), it may not always be appropriate or relevant for taller building 	<ul style="list-style-type: none"> • Comments noted. No change to DMD 43. • The criteria for inappropriate and sensitive areas are more restrictive, and must be referred to in order to define the appropriate areas. It therefore makes sense to include these first. • Criteria in part 4 of the policy address these issues. • As stated in the reasoned justification (paragraph 7.3.3 of the draft), tall buildings, by their nature, are highly visible and therefore automatically become landmarks. This must contribute to the legibility of the borough, and/or local area and preferably signpost areas of public interest. However, it is acknowledged that some tall buildings will only act as local landmarks and therefore their influence will not be borough-wide. Text

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				proposals to provide a landmark and the wording of 'must' should be amended.	has been added to make this clear.
Email	45v.	CgMs on behalf of Notting Hill Housing	Matthew Brewer	<p>DMD 46: Parking Standards:</p> <ul style="list-style-type: none"> • (4) Loss of Parking – 'replacement' should be omitted from the policy wording. The current wording suggests that developments would need to replace parking irrespective of whether there is ample parking at the moment. • (5) Limited/No Parking – This part of the policy refers to PTAL 5-6. We however understand that the maximum PTAL in Enfield is 5 and the policy is considered overly restrictive. There is also no definition of 'limited parking'. The policy would be appropriately reworded such that parking ratios below 0.5 per unit would be considered in areas with a PTAL of 4 and above, subject to meeting other accessibility criteria. 	DMD 45, section on the loss of parking removed. Text amended to refer to PTAL Level 5 or above and to provide greater clarity.
Email	45w.	CgMs on behalf of Notting Hill Housing	Matthew Brewer	<p>DMD 48: Accessing and Servicing (paragraph 8.3.1):</p> <p>It is not always possible or appropriate to provide servicing on site. The wording should ensure suitable flexibility so that where appropriate, and provision on site is not possible, off site servicing can be explored.</p>	Text amended for DMD 47 (paragraph 7.3.3). Additional wording added to this paragraph to reflect this comment and provide appropriate flexibility.
Email	45x.	CgMs on behalf of Notting Hill Housing	Matthew Brewer	<p>DMD 56: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement:</p> <ul style="list-style-type: none"> • Site Waste Management Plans (SWMP) are a legal requirement under other non 	No changes to DMD 57. Comments noted, however, targets are not stipulated in legislation.

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				<p>planning legislation. It is considered that as covered under other legislation it is not necessary to include the additional requirement in this document.</p> <ul style="list-style-type: none"> SWMPs and Procurement & Construction Plans require significant input from contractors and detailed information on the specification of the development – both of which are not generally available at planning application stage and therefore these detailed requirements should not be included as a requirement under planning. 	
Email	45y.	CgMs on behalf of Notting Hill Housing	Matthew Brewer	<p>DMD 59: Assessing Flood Risk: This policy sets out requirements related to the validation of documents which should not in itself form a planning policy within the DMD, but should instead be included in the local validation requirements.</p>	No change to DMD 60. This policy specifies what developers must demonstrate through the submission of a Flood Risk Assessment and mitigation considerations for groundwater flooding.
Email	45z.	CgMs on behalf of Notting Hill Housing	Matthew Brewer	<p>DMD 60: Sustainable Drainage Systems: The wording should be amended to include the requirement for SuDS to be incorporated, unless it can be demonstrated not to be appropriate or feasible.</p>	Text amended but suggested change not incorporated: In accordance with the adopted Core Strategy all developments are required to incorporate SuDS. The London Plan (policy 5.13) requires SuDS 'unless there are practical reasons for not doing so', DMD 61 (paragraph 8.5.11) details this.
Email	45aa.	CgMs on behalf of Notting Hill Housing	Matthew Brewer	<p>DMD 62: Protection of watercourses and flood defences: Part (b) should be amended. There is the potential for developments to be located within 8 meters of an existing water course where this does not affect existing access</p>	DMD 63 reflects the advice of the Environment Agency Guidance that an 8 metre wide undeveloped strip to be provided alongside river.

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				opportunities to the watercourse and does not affect flood defences. The wording of the policy should include relevant flexibility in this regard.	
Email	46a.	English Heritage	Graham Saunders	DMD 1: Achieving High Quality Design Led Development: Should make an explicit reference to the need for developments to respond positively to the local character and historic context.	Text for DMD 37 amended. Context and character are among the first considerations mentioned in the policy. Context is then defined in 6.1.3 as including the historic context. In addition, a reference to the need to reinforce “historic patterns of development, landscape...” has been added to the policy text.
Email	46b.	English Heritage	Graham Saunders	DMD 2: Design Process: Where a proposal impacts on the historic environment, applicants need to engage with English Heritage as early as possible in order to ensure the correct information is provided with the application.	No change to DMD 38. Covered in part by DMD 44, requiring the submission of a heritage statement with applications affecting heritage assets and recommending contact with English Heritage.
Email	46c.	English Heritage	Graham Saunders	DMD 3 (Sustainable Design and Construction Statements) and DMD 4 (Environmental Assessment Methods): Suggest that proposals to introduce climate change measures into the historic environment are carefully considered against the need to conserve the significance of heritage assets.	No change to DMD 49 and 50. Applications will be assessed against all local plan policies including those relating to the protection of heritage assets. The heritage policies are strong enough to allow the benefits of sustainability measures to be weighed against any potential harm to heritage assets and, if appropriate, for sustainability requirements to be relaxed as a result.
Email	46d.	English Heritage	Graham Saunders	DMD 44: Tall Buildings: <ul style="list-style-type: none"> Policy falls short of providing a positive strategy to the management of tall buildings. The strategy should be articulated via a map [to better reflect para 	<ul style="list-style-type: none"> Further discussion held between the Council and English Heritage (8th January 2013). No change to DMD 63. The Council does not believe it is possible to create maps covering all of the criteria within the policy and

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				<p>154 and 157 (point 7) of the NPPF].</p> <ul style="list-style-type: none"> • Welcome the requirements of the D&A statement, but request the analysis of the significance of any heritage asset is also required. • Applicants when preparing visualisation should also take account of seasonal changes and atmospheric conditions. Suggest the Mayor's VMF should be used as a basis for what information and details should be provided when undertaking any visualisation work relating to tall buildings and views. 	<p>therefore composite maps would give a false indication of precision, still necessitating a criteria-based policy to be developed.</p> <ul style="list-style-type: none"> • This is already required as part of DMD44 and the accompanying appendix, <i>Heritage Statements</i>. • Text amended for DMD 43. References to seasonal and atmospheric variation made in part 6). Also text added to ensure visualisations are produced in line with the guidance in the Mayor's Supplementary Planning Guidance.
Email	46e.	English Heritage	Graham Saunders	<p>DMD45: Preserving and Enhancing Heritage Assets: Expand policy to include the following elements:</p> <ul style="list-style-type: none"> • A need for applicants to demonstrate an understanding of the significance of heritage assets • As a minimum requirement applicants should be required to make reference to the Greater London Historic Environment Record (GLHER) or undertake a desk top analysis and reference to other documentations • emphasis needed on proposals to conserve, enhance, better reveal and/or restore heritage assets and their settings • Where harm is proposed, this should be justified in line with the tests set out in the 	<p>Addressed as follows:</p> <ul style="list-style-type: none"> • Included in the heritage statement requirements (Appendix 6). • Already a requirement of the heritage statement • DMD 44 refers to conserving and enhancing assets • NPPF will be a material consideration in the determination of applications. • The Council's approach requires reference the Conservation Area Character Appraisals/Management Proposals or equivalent management documents in order to make sure the information on which decisions are based are as up to date as possible and specific to that asset. • Applications will be assessed against all local plan policies including those relating to the

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				<p>NPPF.</p> <ul style="list-style-type: none"> • Suggest identifying issues and management responses specific to different types of asset • cross reference with climate change policies and the need for a balanced approach, giving the retention and protection of the asset sufficient weight. 	<p>protection of heritage assets.</p>
Email	46f.	English Heritage	Graham Saunders	<p>DMD45: Preserving and Enhancing Heritage Assets: Need to reflect wording of NPPF throughout i.e. conserve and enhancement appropriate to the significance of the asset.</p>	<p>Text amended. References to “preserve” changed to “conserve”. The NPPF is a material consideration in the assessment of planning applications and therefore the relative significance of the asset will be taken into account when assessing the impact of any proposals. However, the Council wishes to conserve and enhance all of our heritage assets and therefore the default position must be to conserve and enhance them, with strong justification needed in all cases where this is not achieved.</p>
Email	46g.	English Heritage	Graham Saunders	<p>Chapter 11: Green Infrastructure: It is important to highlight the heritage value of the Borough’s green infrastructure.</p>	<p>Historic parks and gardens are already included on the list of assets, as are historic landscapes (e.g. conservation areas such as Trent Park).</p>
Email	46h.	English Heritage	Graham Saunders	<p>Area of Special Character Boundary Review- The level of detail regarding information and management could be improved, including in order to take heritage assets off the risk register.</p>	<p>The areas of Area of Special Character (AOSC) are much larger than Enfield’s identified Conservation Areas. Much of the detailed characteristics of the Areas of Special Character are informed by the 2011 Characterisation study which contains more detail on each AOSC. The DMD is not considered the appropriate place to discuss detailed management issues, where</p>

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					these are not directly linked to development.
Email	46i.	English Heritage	Graham Saunders	Support changes to areas of Archaeological Importance.	Comments noted. No change.
Email	46j.	English Heritage	Graham Saunders	Report on location of tall buildings and important local views: <ul style="list-style-type: none"> Concern that the study of existing tall buildings is driving where future buildings will be considered appropriate. Concern that the conservation and enhancement of the historic environment and consideration of the significance of heritage assets has not been sufficiently considered. concerned that the last sentence states that exemplary designed tall buildings may be acceptable within or close to nationally or locally designated heritage assets 	<ul style="list-style-type: none"> Subsequent meeting held with English Heritage on (8th January 2013) to confirm that this is not the case. These issues are considered in DMD 43. Deleted from the evidence base document.
Email	46k.	English Heritage	Graham Saunders	Lack of detail on why the views are valued and how they will be managed.	Details considered sufficient for the purposes of informing DMD policy.
Email	46l.	English Heritage	Graham Saunders	Policies Map should include other area designations such as Registered Parks and Gardens, and Scheduled Monuments.	Registered Parks and Gardens, and Scheduled Monuments are not local land use policy designations and therefore not appropriate for the scale of the Policies Map. A copy of the Register is held electronically and on the Council's website
Email	46m.	English Heritage	Graham Saunders	Sustainability Appraisal Report: The SA objective relating to the historic environment appears to have been combined with the matters relating to green and open spaces. Suggest that these two issues are in many cases different and therefore need to be	Comments have informed final Sustainability Appraisal Report.

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				treated separately. Our principal concern is that by combining the two could affect the ability of the SA process to assess the impact of the policies upon the historic environment. Encourage Council to address this issue, especially when considering the scoring provided for each policy within Appendix 1.	
Email	46n.	English Heritage	Graham Saunders	Under the baseline information we would suggest that the environmental and sustainability problems for the historic environment are not limited to potential deterioration. We would also suggest that other threats include development pressure and inappropriate development proposals also cause potential problems. In addition the details provided on the number of and type of heritages at risk is limited, and not sufficiently comprehensive to provide a clear picture of the condition of the historic environment.	Comments have informed final Sustainability Appraisal Report. The information provided in the baseline data should be proportionate, and there is a limit to how much data can be incorporated to the report.
Email	47a.	North London Waste Authority	Barbara Herridge	Chapter 6: Design and Heritage: The draft DMD mentions good design throughout. The NLWA notes that there will be an emphasis on achieving good design for any new developments along the River Lee, which includes any new developments on the EcoPark site. The NLWA support this policy and note that guidance will be provided in the Enfield Design Guidance. However, further information should be provided within the DMD as to how good design should be approached for different building types and	Further design guidance for Edmonton EcoPark is provided in the planning brief for this site.

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				land uses.	
Email	47b.	North London Waste Authority	Barbara Herridge	DMD 44: Tall Buildings: Considers that the policy should be amended to provide more detail, so that it is clearly supportive of large buildings in industrial areas as it would be reasonable to expect that industrial areas would be more sympathetic to taller structures.	While the Council agrees that the functional requirements of industrial buildings may necessitate taller/larger structures, and that these buildings may be acceptable in industrial areas, it is considered that DMD 43 gives sufficient flexibility to allow for this.
Email	47c.	North London Waste Authority	Barbara Herridge	DMD 50: Energy Efficiency: <ul style="list-style-type: none"> The NLWA support the vision for a low carbon future and the role that energy efficiency will play within that. However, the policies should be appropriate for different types of development. Further information is required to understand how energy efficiency standards that are proposed would be applied to new industrial and commercial development such as the new waste treatment facilities which would be built on the EcoPark site. 	Comments noted. DMD 50 set outs specific standards for non residential development, consistent with London Plan policy. Text has been moved to clarify that technical feasibility and economic viability is applicable to all parts of the policy.
Email	47d.	North London Waste Authority	Barbara Herridge	DMD 56: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement: <ul style="list-style-type: none"> The NLWA supports the principle of the objective this policy but suggest that a balance needs to be struck between the high aspirations for sustainable design and construction and the practical reality of conditioning and enforcing compliance with detailed matters of construction procurement and development operation. 	Text added to DMD 57 (paragraph 8.3.6) to state that targets will be subject to technical feasibility and economic viability.

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				<ul style="list-style-type: none"> In the case of industrial and commercial development, the specialist nature of such buildings may limit the scope for compliance with these policies and this should be acknowledged. In addition, very high standards of construction waste minimisation may not be achievable for brownfield sites Would like to see policy amended such that an equivalent standard to BREEAM can be used where relevant to provide more flexibility 	
Email	47e.	North London Waste Authority	Barbara Herridge	DMD 57: Water Efficiency: Industrial uses of water would not fit with the benchmark approach set out in the policy. Therefore suggest that further clarity is provided for industrial water uses and whether alternative standards would apply.	Text added to DMD 58, paragraph 8.4.4 regarding exceptional circumstances relating to feasibility and viability.
Email	47f.	North London Waste Authority	Barbara Herridge	DMD 64: Air Quality: <ul style="list-style-type: none"> Would like to see further information on the meaning of 'air quality neutral' and whether there will be different targets for different building types Concerned that the restriction on locating potentially polluting developments close to sensitive areas such as green belt and ecological areas will constrain the ability of the NLWA to deliver treatment facilities at Edmonton EcoPark and other sites along the river Lee. Suggests that the policy is clarified so restriction does not apply to 	The London Plan defines 'air quality neutral' therefore development will be required to meet and will be assessed against this definition. DMD 65 has been amended to clarify that certain uses must be separated or incorporate adequate mitigation measures.

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				sites which are already designated for an industrial or other potentially polluting use.	
Email	47g.	North London Waste Authority	Barbara Herridge	<p>DMD 75: Waterways:</p> <ul style="list-style-type: none"> • Supports this policy, however there is concern that the freight by water opportunity will be undermined by an expectation that the first priority is for the amenity and convenience of waterside users and leisure uses of the river itself • Might be helpful if the DMD highlights any concerns or tensions about the use of the River Lee for both freight and leisure • Additional information should be included in the AAP putting greater emphasis on how goals for sustainable transport for business and reducing vehicle movement impacts can be realised through water transport, alongside the ambitions to open up the river Lee for leisure uses. • The river Lee could provide opportunities for freight by water to and from Edmonton EcoPark. As the EcoPark site is already a significant transport node given the number of vehicle movements associated with material arriving to and leaving from the site by road, any opportunities would allow cost effective more sustainable transport alternatives should be supported • Despite support for the use of the water to transport freight, historically, there has been viability issues with proposed water 	Text amended for DMD 75. The ordering of text in this policy is not listed in order of preference between the policy objectives. However, the text has been amended to include a more general statement which supports development which maximises the transportation of freight by water.

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				<p>transport schemes</p> <ul style="list-style-type: none"> Policy should explicitly recognise that water transport should not be required as part of a development where it cannot be shown to be viable or feasible. 	
Email	47h.	North London Waste Authority	Barbara Herridge	<p>Chapter 11: Green Infrastructure: Some requirements are not reasonably related to the development of the EcoPark, for example the requirement that new development should contribute to improving green infrastructure such as parks, allotments, recreation grounds and play areas and the draft DMD should take this into account</p>	Policy on Green Infrastructure has been removed.
Email	48a.	Enfield Health Improvement Partnership	Dr Shahed Ahmad	<p>DMD 36: Food and Drink Establishments: Enfield is a borough that faces a number of health challenges; it has one of the biggest gaps in life-expectancy between wards in London and one of the highest childhood obesity rates in the country.</p> <p>Welcome the LB Enfield Development Management Document and in particular the intention to restrict new takeaways from locating within 400m of a secondary school entrance. We view this as an important step in signalling the intention to reduce obesity in our younger population and to work to ensure that the environment supports healthy behaviours wherever possible.</p>	Comments noted.
Email	49a.	Resident	Danielle Shap	Does not support the de-designation of Green Belt land at the corner of land north	Boundary amendment is supported by the Detailed Green Belt boundary review 2012 –

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				of Bullsmoor Lane and bounded by the A10, M25 and New River.	please refer to Green Belt evidence base 2013.
Email	50a.	Chace Community School	Sue Warrington	Policies Map (open space designation): Agree to the new proposed boundaries around Chace Community School providing there is assurance that the playing field cannot/ will not be sold off to a private company for development without prior knowledge.	Comments noted. Development would require planning permission and be subject to further consultation. Any proposals for development would be assessed against relevant planning policies.
Email	51a.	Resident	G. Ansell	Policies Map (Metropolitan Open Land designation): Request that the Metropolitan Open Land designation is extended to include land to the west of the running track at Enfield College.	See response to 18a.
Email	52a.	Greater London Authority	Colin Wilson	DMD 5: Affordable Housing: <ul style="list-style-type: none"> • DMD is contrary to the existing London Plan policy 3.11 • DMD is contrary to national policy as set out in NPPF • DMD says nothing on the availability or resources: London Plan policy 3.11cf • Questionable that the policy wording would allow statutory test for the use of S106 to be applied 	DMD 1: Affordable Housing on Sites Capable of Providing 10 or more units and the supporting text have been amended. Some of the more detailed information on the Affordable Rent Tenure (ART) has been removed. Changes have also been made to ensure conformity with anticipated changes to the London Plan (Revised Early Minor Alterations – November 2012). The key considerations in terms of Affordable Rented Tenure remain, particularly the need to provide affordable family homes.
Email	52b.	Greater London Authority	Colin Wilson	DMD 8: loss of housing: London Plan policy 3.14 (Existing Housing) states that loss of housing should be resisted unless housing is replaced at existing or higher densities with at least equivalent floor space. There would be merit to including in	Comments noted.

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				the DMD policy reference to no loss of floorspace and total number of habitable rooms. Particularly relevant for estate renewals where existing accommodation may not meet housing standards and replacement of habitable rooms may result in an overall loss of affordable housing. While this policy is more relevant to central London high-density estates, there may in instances in Enfield where it would be appropriate to consider floorspace calculations to ensure no loss.	
Email	52c.	Greater London Authority	Colin Wilson	Chapter 3: Housing: No apparent reference to student accommodation; while Enfield may not be experiencing the same level of pressure for such accommodation as other boroughs, would be helpful to understand if it is proposing any specific policy of SPD regarding this.	Comments noted.
Email	52d.	Greater London Authority	Colin Wilson	Chapter 5: Economy: The draft policies set out in this chapter are welcomed. The Council is proposing the continued protection of employment sites in the borough, which accords with London Plan policies and aspirations that seek to retain and enhance economic opportunities in outer London boroughs such as Enfield.	Support noted.
Email	52e.	Greater London Authority	Colin Wilson	Chapter 6: Town Centres: The draft policies set out in this chapter are welcomed and in accord with London Plan Policy 4.7. There does appear to be a lack of	Individual shops are covered by Policy 29: Individual Shops and Small Clusters of Shops. DMD text amended to reference London Plan

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				reference to independent and small shops as well as markets, as referred to in London Plan policies 4.8 and 4.9. Consideration should be given to explicitly providing and protecting these through the development management process.	policies for independent shops and street markets in justification paragraph 5.5.3.
Email	52f.	Greater London Authority	Colin Wilson	DMD 35: Development Involving Tourism and Visitor Accommodation: The policies relating to hotels and visitor accommodation, particularly reference to securing 10% wheelchair accessible are welcomed, in accordance with policy 4.5 of the London Plan	Comments noted.
Email	52g.	Greater London Authority	Colin Wilson	Chapter 7: Built Environment: The documents policies on design and heritage are generally supported. The Council has identified suitable areas for tall buildings in accordance with London Plan policy 3.7.	Support noted. Policies to be retained with some amendments.
Email	52h.	Greater London Authority	Colin Wilson	Chapter 8: Transport DMD 46 – Parking Standards: Transport for London (TfL) recommend explicit reference to London Plan policies on blue badge parking and electric vehicle charging points also be included. Concerns over point 4 of this policy which relates to the loss of existing parking. Current working suggests that existing parking demand should be used for agreeing future levels of car parking and that on that basis existing provision (which may not be in	DMD 45 text amended. London Plan Parking Standards including standards for blue badge and electric parking have been appended to the DMD. Section on the Loss of Parking has been deleted. Point 6 has also been amended.

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				accordance with current standards) could therefore be retained. London Plan policy 6.13 recognises that parking policy can have significant effects in influencing transport choices and addressing congestion. TfL suggests removal of this specific part of the policy as point 1 (b) already references existing parking pressures in the context of London Plan standards for parking provision. TfL also suggest point 6 of this policy is reworded to encourage proposals for car clubs in certain circumstances, rather than only permitting them subject to certain criteria. Car clubs should be encouraged in line with London Plan policy 6.11.	
Email	52i.	Greater London Authority	Colin Wilson	DMD 47: Vehicle crossover and dropped kerbs: Policy should make reference to Transport for London (TfL) guidance on assessing applications for residential vehicle crossovers on the red route.	Text amended for DMD 46. Cross reference to TfL guidance added.
Email	52j.	Greater London Authority	Colin Wilson	DMD 48: Accessing and Servicing: Transport for London suggest development is encouraged where it is close to wharfs on the River Lee Navigation and would be expected to encourage its use for freight transport in line with London Plan policy 6.14.	No change to DMD 47. DMD 75: Waterways seeks to maximise the transportation of freight on the Lee Navigation.
Email	52k.	Greater London Authority	Colin Wilson	DMD 49: Transport Assessments As well as thresholds for the production of Transport Assessments or Transport Statements from the DfT, TfL also provides	Text amended for DMD 48. References to Service and Delivery Plans and Construction Logistic Plans added. Paragraph 1.5.1 refers to Community Infrastructure Levy payments.

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				<p>thresholds for the production of travel plans which should also be referenced (see GLA letter for the URL)</p> <p>Reference should also be made to the production of delivery and service plans and construction logistic plans (CLPs) which can be coordinated with travel plans in order to promote sustainable transport and construction, re. London Plan policy 6.1.</p> <p>Mitigation of development impact needs to be identified within any transport assessment/ statement as well as in the travel plan, and explicit reference to this should be made.</p> <p>In addition no reference has been made within the document to the Mayor's CIL with came into force on 01.04.12 and which will apply to most development in Enfield. Explicit reference to this should be included, in accordance with London Plan policies 6.5 and 8.3.</p>	
Email	52l.	Greater London Authority	Colin Wilson	<p>Chapter 9: Climate Change: Draft DMD policies set out here and in chapter 2 effectively communicate London Plan policies, requiring major applications to reference the Mayor's energy hierarchy, encouraging provision of DENs and low and zero carbon technologies and sustainability measures. CO2 emissions reductions are in line with policy 5.2.</p> <p>Policy DMD 51 is welcomed in terms of seeking commitments from developers in</p>	Comments noted.

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				<p>respect of decentralised energy networks. The reference to allowable solutions and carbon off-setting is welcomed, and the opportunity for relevant officers to discuss the mechanisms and details of this policy in due course would be welcomed.</p> <p>Re. low and zero carbon energy, London Plan policy 5.7 requires the reduction in CO2 emissions through the use of on-site renewable energy generation, where feasible. Policy DMD 52 refers to economic viability, but there is concern for mechanisms for assessing whether such an exemption would apply. Further discussion about the implications of the policy being worded in this way would be welcomed.</p>	
Email	52m.	Greater London Authority	Colin Wilson	<p>Chapter 11: Green Infrastructure: Policies related to open spaces, waterways and biodiversity are welcomed. The Mayor's All London Green Grid SPG, published in March 2012, sets out a vision and spatial framework for London-wide green infrastructure - cross-reference to aspirations for partnership working with adjoining boroughs would be welcomed.</p>	Text amended. Reference to All London Green Grid added to paragraph 10.1.4.
Email	52n.	Greater London Authority	Colin Wilson	<p>Chapter 11: Green Infrastructure: Reference should be made to the Mayor's revised Supplementary Planning Guidance (SPG) on Shaping Neighbourhoods: Children and Young People's Play and Informal</p>	Text amended. Reference to SPG added in a footnote for DMD 73.

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				Recreation SPG. This introduces the concept of lifetime neighbourhoods, as set out by policy 7.1 of the London Plan, and proposes innovative approaches to play provision, management, and the use of natural features.	
Email	52o.	Greater London Authority	Colin Wilson	Chapter 11: Green Infrastructure: Protection and enhancement of playing fields and sports facilities is welcomed, in accordance with London Plan policy 3.19. The Council is suggesting a resistance to artificial grass pitches in DMD 74 and there is a lack of reference to indoor facilities. Further discussion regarding this position would be useful, noting the reference under paragraph 3.111 to the London Plan regarding a shortage of sports hall and artificial pitches across London. Whilst there is mention under policy DMD 20 in relation to sports facilities, there should be a cross-reference to policy DMD 74 and vice versa.	The Council support Artificial Grass Pitches (AGP) within more urban/dense areas. However, in a rural context where there are lower PTALs, proposals for AGP and its associated structures for example floodlighting, may be detrimental to the area.
Email	52p.	Greater London Authority	Colin Wilson	DMD 75: Waterways: The reference to waterways in Enfield is welcomed, in accordance with London Plan policies 7.24-7.28.	Comments noted.
Email	52q.	Greater London Authority	Colin Wilson	Policies Map (Open Space designations): Green Chains and Sites of Importance for Nature Conservation. The refinements being made to Metropolitan Open Land (MOL) boundaries are acceptable and do not raise any strategic issues.	Comments noted.

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Email	52r.	Greater London Authority	Colin Wilson	Policies Map (Nature Conservation designations): It is understood that the London Wildlife Sites Board (LWSB) has provided advice setting out feedback on the review of Sites of Importance for Nature Conservation. There are no strategic comments to make regarding this.	Comments noted.
Email	52s.	Greater London Authority	Colin Wilson	Policies Map (Green Belt designations): The Council's review of the Green Belt boundaries has been considered. The Council notes that there are some 30 changes to the borough's GB boundary, which results in 13 gains and 17 losses – net loss 6.07ha of Green Belt land. As discussed between officers, the total overall loss of Green Belt land suggested in Appendix A does not marry with the figures suggested above, and officers would welcome further confirmation being provided.	Officers have noted to discrepancy and amended the Green Belt Review report and Appendix A to reflect the actual net loss at 4.35ha.
Email	52t.	Greater London Authority	Colin Wilson	Policies Map (Green Belt designations): There are three larger sites which together amount to over 5ha and amount to a substantial loss of Green Belt land, thereby raising issues of conformity to the London Plan. Site 1. Hadley Wood North – it is appreciated that this row of houses more closely relates to the urban character on the south side of Waggon Road. The extensive back gardens of these properties, however, assist in providing a more gradual transition from rural to urban.	Comments noted, however the methodology used as part of the detailed Green Belt Boundary review sought a consistent approach to defining the Green Belt boundary and in this case used the following criteria: <i>Residential dwellings: with clearly defined physical boundaries, such as an established building line or row of gardens made up of 3 or more residential properties.</i> This is considered to be a strong, enduring and defensible boundary. The DMD provides

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				There is a concern that in allowing a de-designation, that intensification of these properties could result, thereby threatening the open character and buffer created by the current building line.	additional policy references on garden land development and development within the urban fringe. This would prevent inappropriate development as well as promote the role new development should perform on properties that adjoin the Green Belt.
Email	52u.	Greater London Authority	Colin Wilson	Site 2. Royal Chace Hotel – noted that this site has been introduced in the current round of consultation. It appreciated that the site has extensive areas of hardstanding and buildings within the curtilage, such buildings are typically found in the Green Belt and it could be argued they do not necessarily conflict with the open character. The grain of development is significantly different to the residential development to the east, and there is concern that de-designation could threaten this and result in residential developments coming forward to match the scale of development on, for example, Oak Avenue. This would result in an extension to what is otherwise a defensible planning curtilage/ property boundary to the Green Belt in this location.	Comments noted, however proposed boundary stands on the grounds of providing a more robust, logical and defensible boundary, in this case the hedge line. The DMD provides additional policy references on garden land development and development within the urban fringe. This would prevent inappropriate development as well as promote the role new development should perform on properties that adjoin the Green Belt.
Email	52v.	Greater London Authority	Colin Wilson	Site 3. Bullsmoor Lane - a substantial parcel of land containing a garden centre, industrial buildings and dwellings. Such buildings are also found in the Green Belt and do not in themselves compromise its character. This parcel of land assists in creating a buffer between the Green Belt and dense residential areas to the south and east. The concern is	Comments noted, however proposed boundary provides a more robust, logical and defensible boundary, in this case the new River. The DMD provides additional policy references on development within the urban fringe. This would prevent inappropriate development as well as promote the role new development should perform on properties that adjoin the Green Belt.

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				that de-designation would create pressure for development to come forward of a density similar to that to the east, adding pressure on the site to the north to be de-designated, which is understood to be in the same ownership. It appears the site has recently been subject to development not in keeping with its Green Belt designation and officers would welcome confirmation of the planning history relating to the site and any enforcement proceedings taking place.	
Email	52w.	Greater London Authority	Colin Wilson	Green Belt Protection of Green Belt is a key priority for the Mayor: other boroughs are also assessing their Green Belt designation through a similar process and collectively there may be cause for concern regarding the overall loss of Green Belt land across London. With a net loss of Green Belt land proposed by Enfield, largely through the 3 large sites, officers are not comfortable recommending some of these alterations to the Mayor at the current time. Welcome further discussion to ensure no general conformity issues arise at the submission stage of the document.	Further discussions were held between officers from the Council and the GLA on 31st January and 14th February 2013. As a result of these discussions specific responses to GLA comments on sites in the green belt are provided above.
Letter	53a.	Fleecefield and Brettenham Primary Schools	Antoinette Goldwater	Request boundary continues to include playgrounds at both schools.	Boundary amended to reflect respondents comments. Please refer to Open Space Policies Map Review (2013)
Letter	54a.	Latymer School	J Soday	Policies Map (Metropolitan Open Land designation): Agree proposed changes and request	No further changes. Further de-designation of land (which is designated as MOL) suggested by respondent is not justified.

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				removal of part of the Church Street recreation ground from Metropolitan Open Land designation.	