

Submission Stage

Development Management Document

**REGULATION 22
CONSULTATION STATEMENT**

January 2014

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1 Process of Engagement

- 1.1 The Development Management Document (DMD) will provide detailed criteria and standard based policies for assessing planning applications and will be a key vehicle in delivering the vision and objectives for Enfield as set out in the Core Strategy. The DMD is a borough-wide document and will apply to all planning applications including residential, commercial and mixed use development. Once adopted the DMD will form part of Enfield's Local Plan, which includes the adopted Core Strategy (2010), and which, alongside the London Plan and national policy, will inform new development in the borough.
- 1.2 In order to satisfy the requirements of Regulation 22 (1) (c) (of the Town and Country Planning (Local Development) (England) Regulations 2012) and the Council's Statement of Community Involvement (2006) this statement incorporates and expands on the Consultation Statement prepared at Proposed Submission stage, published in March 2013.
- 1.3 This Regulation 22 Consultation Statement provides a summary of the consultation stages undertaken in preparing the Plan. It highlights the periods of consultation that have helped in the preparation of the Development Management Document to the point of Submission.
- 1.4 The Submission DMD was prepared in light of all of the consultation responses received on the Draft DMD and Submission Version DMD.

2 Background to Plan Preparation

- 2.1 Following the adoption of Enfield's Core Strategy in 2010, the process of preparing the Development Management Document began in 2011. The Council established an officer level steering group to guide the project at key stages, involving officers from a range of relevant cross-departmental services.

LBE Officer Steering Group

Key Roles: production, guidance, ownership, resources.

CHAIR - Team Leader Planning Policy

MEMBERSHIP Planning Policy Lead Officers
Planning Decisions Manager
Planning and Regeneration Officer
Operations Manager Transportation
Housing Enabling Officer
Education
Property
Sustainable Communities

- 2.2 The Draft DMD was published for consultation for twelve weeks in 2012, from 8th May 2012 to 3rd August 2012. The consultation took place in accordance with Town and Country Planning (Local Development) (England) Regulations 2012, Regulation 18.
- 2.3 The comments and representations received during this stage of consultation informed the preparation of the Proposed Submission Development Management Document (March 2013). The summary of the main issues raised and the steps taken to address these issues by Enfield Council are reproduced in Section 3 of this document.
- 2.4 The Proposed Submission DMD was published for an eleven week public consultation period between the 10th July and 27th September 2013.

3 Regulation 18 Consultation: Draft Development Management Document consultation (2012)

- 3.1 In May 2012 Enfield Council published for consultation the Draft Development Management Document and undertook an extensive twelve week public consultation between May and August 2012.
- 3.2 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.

Bodies and persons consulted

- 3.3 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.
- 3.4 All contacts on the 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 1,500 individuals and organisations were notified, including specific, general and other consultees, and internal officers and councillors.

Duty to Co-operate

- 3.5 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. Details of the Duty to Co-operate are provided in a separate document which forms part of the Submission DMD.

How bodies and persons were consulted

- 3.6 The Draft DMD was made available online, and paper copies were available at all Council libraries and at the Civic Centre.
- 3.7 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>).
- 3.8 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.
- 3.9 A list of public consultation events is shown in Appendix 4.
- 3.10 ***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
- 3.11 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, copies of which are shown in Appendix 2.

Summary of main issues raised and how they have been addressed

- 3.12 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.
- 3.13 The following information provides a list of the main issues raised by the representations and feedback received; and how the Council sought to address them in the Proposed Submission DMD.

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 by the evidence base: Detailed Green Belt Boundary Review (2013).

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).

3. Area of Special Character (AOSC): The land at the rear gardens of the properties fronting Waggon Road are proposed to be removed from the AOSC. Enfield Road is proposed to be retained as an ASOC. Please refer to evidence base: Area of Special Character Boundary Review (2013).

4. Site of Importance to Nature Conservation (SINC): The southern proportion of the Woodcroft Wildspace is proposed to be removed from the Local SINC designation. Please refer to evidence base: Sites of Importance for Nature Conservation (SINC) (2013).

5. Retail: Document amended, Primary and Secondary Shopping Frontages are 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 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.

4 Regulation 20: Representations on the Publication of Proposed Submission DMD

- 4.1 The following section sets out a summary of the main issues raised during Proposed Submission consultation and the Council's responses to them.
- 4.2 The Proposed Submission Draft was formally published for an 11 week public consultation period between the 10th July and 27th September 2013. The Plan and all of its supporting documentation were made available at the Council's website: www.enfield.gov.uk and hard-copies of the DMD were made available to view in all of Enfield's Libraries and the Civic Centre. Supporting documents included:
- Proposed Submission Policies Map
 - Sustainability Appraisal
 - Consultation Statement (2013)
 - Areas of Archaeological Importance Review (2012)
 - Employment Land Review (2012)
 - Enfield Characterisation Study (2011)
 - Areas of Special Character Review (2012)
 - Town Centre Uses and Boundaries Review (2013)
 - Surface Water Management Plan (2012)
 - Pre-feasibility Study of the Viability of a Decentralised Energy Network in the Context of the Upper Lee Valley (2011)
 - Enfield Open Space and Sports Assessment Update (2011)
 - Open Space Policies Map Paper (2013)
 - Metropolitan Open Land and Green Chain Associated Open Space Review (2013)
 - Review of Enfield's Sites of Local and Borough Importance for Nature Conservation (2013)
 - Enfield's Detailed Green Belt Boundary Review (2013)
 - Report on Location of Tall Buildings and Important Local Views in Enfield (2013)
 - Community Infrastructure Levy and Development Management Document Viability Assessment (2013)
 - Equality Impact Assessment (2013)
- 4.3 A list of consultation responses received and the Council's summary response to these can be seen in Appendix 1. Further detail is representations made is set out in the submitted Schedule of Representations.
- 4.4 In total 142 representations were received from the following 33 representors:
1. Outdoor Media Centre
 2. Unknown resident/ individual
 3. British Sign & Graphics Association

4. Resident/ individual
5. Real Securities Ltd
6. Commercial Boat Operators Association
7. Nathaniel Litchfield & Partners
8. Garden Centre Group
9. English Heritage
10. Highways Agency
11. Thames Water
12. Banner Homes
13. Southgate District Civic Trust
14. Theatres Trust
15. Metropolitan Police & MOPAC
16. GLA
17. Trent Park Golf Club
18. Natural England
19. Universities Superannuation Scheme
20. Scottish Widows
21. Canal & River Trust
22. Network Rail
23. Lee Valley Regional Park Authority
24. National Grid
25. LFEPA
26. Environment Agency
27. Sport England
28. IKEA Properties Investment Ltd
29. Costco Wholesale UK Ltd
30. AC Nicholas
31. Fairview New Homes
32. LaSalle Investment Management on behalf of Stonehill
33. BHORA (Broomfield House Owners and Residents Association)

4.5 Proposed Submission Consultation – Soundness and Main Issues

The issues summarised below are those which relate either to soundness of the plan or which can be considered as a major issue.

Main Issue 1: Affordable Housing

Issue	Submission Response
<ul style="list-style-type: none"> • Issue of conformity – the proposed submission document is not in conformity with the London Plan in respect of affordable housing (GLA) • Issue of soundness - affordable 	<ul style="list-style-type: none"> • No change. The key considerations of Affordable Rented Tenure affordability remain, particularly the need to provide affordable family homes.

<p>Housing policy should allow a lower level of affordable housing when development viability justifies it (A C Nicholas)</p>	<ul style="list-style-type: none"> No change. DMD 1 in conjunction with the adopted Core Strategy, London Plan and NPPF provide sufficient flexibility with regards to feasibility and viability.
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Main Issue 2: Lifetime Homes Standards

Issue	Submission Response
<ul style="list-style-type: none"> Issue of soundness - the lifetime homes standards (DMD 8) is not always physically or financially viable (Fairview New Homes) 	<ul style="list-style-type: none"> The ability of development to meet the criteria as set out will be determined on an individual scheme basis and during the planning application stage process

Main Issue 3: Community Facilities

Issue	Submission Response
<ul style="list-style-type: none"> Object - to the requirement of DMD 16 for marketing evidence as it conflicts with the Policy which highlights either the provision of a replacement facility or evidence of marketing (Metropolitan Police Service (MPS) & Mayor's Office for Policing and Crime (MOPAC)). Object - unclear policy DMD 16 in requirement of development in SGAs. Unreasonable in parts and does not fully accord with Core Strategy Policies 7, 8 and 11 (Planning Potential on behalf of Scottish Widows Investment Partnership) Soundness issue - as a requirement of development in SGAs - this part of the policy is unclear, unreasonable in parts and does not fully accord with Core Strategy Policies 7, 8 and 11 (Fairview New Homes). 	<ul style="list-style-type: none"> No change - the suggested change is specific to the requirements of the MOPAC. Generally the requirements to evidence marketing and consultation with the community will be applicable in most circumstances. Focused change proposed as a response to this. Second paragraph amended via a focused change.

Main Issue 4: Economic Development

Issue	Submission Response
<ul style="list-style-type: none"> • Soundness issue - seek flexibility in allowing certain sui generis uses (DMD 19), such as policing uses with similar characteristics to B Class Uses, to be supported on SIL's and PIL's. <i>(Metropolitan Police Service (MPS) & Mayor's Office for Policing and Crime (MOPAC)).</i> • Recommend change - DMD 19 and the Policies Map should return the southern section of the Brimsdown Estate back to an industrial allocation <i>(Planning Potential on behalf of Scottish Widows Investment Partnership)</i> • Add a section to DMD 19 to allow mixed use schemes within strategic industrial locations <i>(Network Rail)</i>. • The maximum of 10% retail in DMD 21 is unrealistically low - suggest a figure of 25% <i>(Planning Potential on behalf of Scottish Widows Investment Partnership)</i> • Locations designated SIL or LSIS have no need for the criteria in DMD 23 to control adverse impact as a result of noise and disturbance, access, parking <i>(Planning Potential on behalf of Scottish Widows Investment Partnership)</i> • DMD 23 should not limit new employment provision to local businesses or small firms. Sites should provide accommodation that is demanded by the market, in accordance with the NPPF. Also, the 	<ul style="list-style-type: none"> • DMD 19 refers to type of uses appropriate for SIL and not use classes. Any such proposals would be assessed alongside relevant policies including London Plan policies • SIL de-designation was accepted as part of the Core Strategy adoption. The DMD does not provide any further evidence to justify re-designating the southern part of the estate as SIL. • The suggested change is not necessary as SIL is principally designated for employment generating uses. The request would be in conflict with London and Local Plan policies. • No change - a figure of 25% is not accepted and would undermine the intended 'ancillary' element such uses perform. • No change, industrial sites do not sit in isolation of other land uses and often are in close proximity to residential areas. • Accepted deletion of the word 'local' as set out in the addendum of focused changes.

<p>last paragraph of part 1 to be unsound (LaSalle Investment Management on behalf of Stonehill Business Park)</p>	
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Main Issue 5: Town Centres

Issue	Submission Response
<ul style="list-style-type: none"> • DMD 25 is too restrictive and therefore is not consistent with greater flexibility given in NPPF (IKEA Properties Investment Ltd). • Policy DMD 25 should be re-worded to reflect paragraphs 24-27 of the NPPF. The NPPF impact test is ‘significant adverse impact’, and there is no NPPF requirement for development to increase the overall sustainability and accessibility of locations. (Universities Superannuation Scheme, and Legal & General National Grid). • The policy restriction of DMD 25 of new development within 300m of the primary shopping area is arbitrary and prevents sites coming forward which can demonstrate that a location beyond this is appropriate. (LaSalle Investment Management on behalf of Stonehill Business Park) • The Oakwood Large Local Centre (DMD 28) should include the Golf Club and its ancillary facilities which operate as part of the Local Parade. The Plan is unsound and the boundary of the Oakwood centre needs to be altered to include the Golf Club car park and clubhouse (Wildstone Planning on behalf of Trent Park Golf Club) • Policy DMD 32 is inflexible in that it only permits food and drink uses within identified centres. Food and drink uses are appropriate outside of centres such 	<ul style="list-style-type: none"> • While DMD 25 continues to be NPPF compliant, the policy has been revised as set out in the addendum of focused changes. • While the town centres first approach of DMD 25 continues to be NPPF compliant, focused changes are accepted. • The use of the distancing of 300m allows for a walking distance of less than 5 minutes from the primary shopping area of a town centre. Providing a distance allows for proposals to remain accessible and connected to the town centre, in accordance with NPPF paragraph 23. • No change as the boundary reflects the DMD evidence base and is considered NPPF compliant. • Agree to delete the word “only”.

<p>as at Golf Clubs or other sporting facilities and in its current form the Policy is unsound and unjustified. Request greater flexibility in terms of the location of such establishments – therefore suggest deleting the word ‘only’ (Wildstone Planning on behalf of Trent Park Golf Club; and Legal & General National Grid)</p>	
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Main Issue 6: Design and Heritage

Issue	Submission Response
<ul style="list-style-type: none"> • Object to the DMD 41 blanket ban on internally illuminated signs, box facias or projecting signs in conservation areas as unduly restrictive and contrary to the Control of Advertisements Regulations 2007 (Outdoor Media Centre; and British Sign & Graphics Association) • The requirement in DMD 38 for Design & Access Statements is beyond the remit of this policy (Planning Potential on behalf of Scottish Widows Investment Partnership) • It is beyond the remit of local policies to stipulate content of Design & Access statements - DMD 38 should be deleted (Fairview New Homes). • Policy DMD 39 policy is excessively onerous (Planning Potential on behalf of Scottish Widows Investment Partnership). 	<ul style="list-style-type: none"> • Amendment agreed as set out as set out in the addendum of focused changes. • DMD 38 focused changes proposed. • No change, as the requirements are not considered to be too specific. • Focused changes proposed.

Main Issue 7: Climate Change

Issue	Submission Response
<ul style="list-style-type: none"> • There is a direct conflict between DMD 54 and the Government’s current consultation on allowable solutions which may require an amendment to the DMD policy (<i>Planning Potential on behalf of Scottish Widows Investment Partnership</i>) • The DMD 55 requirements for green roofs on B8 premises could result in buildings being unsuited to their intended purposes due to the additional weight. Warehouse spaces are typically unheated spaces and the best opportunity to reduce energy consumption is through the use of roof lights, which a green roof requirement would prevent (<i>Planning Potential on behalf of Scottish Widows Investment Partnership</i>) • As worded DMD 58 fails to adequately provide the policies that were foreshadowed in the Core Strategy and that are required to implement the NPPF and London Plan Policy 5.14 on water efficiency. As a result, the DMD is not effective, nor consistent with national policy (<i>Thames Water</i>) • The policy wording for DMD 59 does not go far enough to provide explicit policy guidance on the potential for sewer flooding. Without the inclusion of such wording it is considered that the DMD is unsound as it is not effective (<i>Thames Water</i>) • It is proposed that the text for DMD 60 on flooding is amended (<i>Thames Water</i>). 	<ul style="list-style-type: none"> • No change since the policy is not in direct conflict. The consultation relates to the 2016 change to zero carbon and this has yet to be decided. Whilst there could be a number of impacts, the thrust of the policy would still broadly comply. An amendment at this stage would be premature. • No change as the Policy clearly states that it is “subject to technical and economic feasibility and other relevant planning considerations”. • Some changes in response to this representation is set out in the addendum of focused changes. • While explicit guidance for potential sewer flooding is not considered as necessary, changes to DMD 59 wording are proposed as focused changes in response to the Environment Agency. • Focused change accepted.

Main Issue 8: Environmental Protection

Issue	Submission Response
<ul style="list-style-type: none"> • DMD 64 is not sufficiently clear to enable it to be satisfactorily implemented through the development management process (<i>Thames Water</i>) • Amend DMD 65 to require a technical assessment that confirms either no adverse amenity impact on air quality on future occupiers of the proposed development or that the development can be conditioned to avoid/ mitigate potential for adverse amenity (<i>Thames Water</i>) • The wording DMD 68 is too restrictive to be applied in a highly developed London borough such as Enfield, where residential, leisure, industrial and other uses are frequently located adjacent to each other (<i>Thames Water</i>) • DMD 67 does not fully comply with the provision of London Plan Policy 5.22 on Hazardous Substances and Installations (<i>GLA</i>) 	<ul style="list-style-type: none"> • No changes proposed DMD 64 is considered to be clear and sound. • Air quality assessments are required as either standalone documents or as part of an Environmental Assessment and therefore the additional suggested wording is not considered necessary • Amendments are proposed as focused changes in response to this representation. • Focused changes proposed as set out in the addendum.

Main Issue 9: Green Infrastructure

Issue	Submission Response
<ul style="list-style-type: none"> • In Ponders End Industrial Estate under DMD 75 it would not be possible to achieve a workable layout fronting the river without also introducing new roads and parking. It is therefore difficult to understand how the detailed objectives of this policy can be fulfilled (<i>Planning Potential on behalf of Scottish Widows Investment Partnership</i>) • Additional clarity sought for DMD 75 on 	<ul style="list-style-type: none"> • No change to the policy as the overall objectives would still apply notwithstanding any exceptional circumstances specific to individual sites. • Focused changes proposed as set

<p>terminology of moorings. Concern about the term ‘permanently moored vessels’ which has not been resolved. As it stands would allow for residential moorings in the LVRP (Canal & River Trust; and LVRPA)</p>	<p>out in the addendum.</p>
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Main Issue 10: Green Belt

Issue	Submission Response
<ul style="list-style-type: none"> • The wording of DMD 82 should be amended to include flexibility for circumstances where some features are removed, but mitigated (Thames Water) • Object to the inclusion of land in DMD 83. Question the GB Review methodology for the inclusion of certain areas of land in the borough, particularly at Enfield Road (Fairview New Homes) • Policy DMD 89 appears to set out a ‘two tier approach’ to protecting the Green Belt and delivering sustainable development for which there is no national policy to support. The NPPF does not suggest that a Council can elect to consider the complete or partial redevelopment of certain sites as ‘appropriate’ in Green Belt terms, whilst the redevelopment of other similar but unidentified sites would remain ‘inappropriate’. Revise the policy by the deletion of the words in order that it accords with paragraph 89 of the NPPF (Garden Centre Group) • DMD 89 is unsound and needs to be reworded to reflect the guidance in the NPPF which simply requires that extensions or alterations are not disproportionate to the size of the original building. A more balanced judgment is needed to determine whether a design is acceptable in 	<ul style="list-style-type: none"> • Focused changes proposed as set out in the addendum. • DMD 83 no change - justification for inclusion of sites in designated areas are provided in the DMD evidence base. • The criteria is NPPF compliant, however the Council accepts that focused changes are required as set out in the addendum. • DMD 89 should be read alongside other policies within the chapter which provide additional criteria-based approach for assessing appropriate types of development as set out in Paragraph 89 of the NPPF.

aesthetic terms in the Green Belt (Wildstone Planning On behalf of Trent Park Golf Club)	
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Main Issue 11: Transport and Parking Issues

Issue	Submission Response
<ul style="list-style-type: none"> • DMD 45 sets a tone which could encourage car parking provision within all development proposals regardless of their location, nature and scale. This is not consistent with the overall emphasis of London Plan Policy 6.13 (GLA) • Where there are existing structures surrounded by limited amenity space, such as railway arches, it will not always be possible to provide provisions for disabled parking as part of the redevelopment of a site in accordance with Policy DMD 45. As such it is recommended that an additional section is added to the policy (Network Rail) 	<ul style="list-style-type: none"> • Focused changes are proposed as set out in the addendum. • The need for additional flexibility within the Policy is not accepted and is contrary to London Plan and Core Policy.

Main Issue 12: Lee Valley Regional Park

Issue	Submission Response
<ul style="list-style-type: none"> • The Proposed Submission DMD is considered to be unsound as there is no policy within the document to help guide appropriate development within the Lee Valley Park (LVRPA) 	<ul style="list-style-type: none"> • The DMD is not the appropriate local plan document to set out individual site specific policies. Where relevant and appropriate future Local Plan documents, in particular Central Leaside Area Action Plan will cover the level of detail.

APPENDIX 1

Regulation 20: Summary of representations received during Proposed Submission Consultation and the Council's responses.

No.	Organisation/Name	Summary Comments	Soundness	LBE Response
1.	Outdoor Media Centre	Object to DMD 41 blanket ban on internally illuminated signs, box facias or projecting signs in Conservation Areas. Unduly restrictive and contrary to the Control of Advertisements Regulations 2007 which require all advertisements proposals to be considered on their individual merit. No justification provided for a blanket wide ban of all advertisements of certain types and/ or within a certain area.	Not stated	Amendment to wording of DMD 41 accepted.
2.	Individual	General comments related to processes outside of the scope of the DMD.	Not stated.	No comment.
3.	British Sign & Graphics Association	Object to DMD 41 blanket ban on internally illuminated signs, box facias or projecting signs in Conservation Areas. Unduly restrictive and contrary to the Control of Advertisements Regulations 2007 which require all advertisements proposals to be considered on their individual merit. No justification provided for a blanket wide ban of all advertisements of certain types and/ or within a certain area.	Not stated	Amendment to wording of DMD 41 accepted.
4.	Individual	Majority of the representation relates to Meridian Water Masterplan. General representation raises concerns that planning applications involving the waterfront need to have a relative proportion of affordable moorings and some form of amenity such as a waterside water tap made as a condition of developing the area. The waterways which were made for freight and have become both residential and leisure places have new developments built alongside them which then exclude the boating community.	Not stated	No further action required
5.	Real Securities Ltd	Real Securities Ltd own the land at Beech Hill and agree with removal of land from Green Belt – fully support the DMD.	Support	No further action required

6.	Commercial Boat Operators Association (CBOA)	<p>Section 10.4 and paragraph 10.4.3. Waterways Support the included use of the River Lea for freight. CBOA are in full agreement that water freight is a realistic and sustainable alternative to the movement of freight by road. Encouraging applicants to consider River Lea freight use as part of their Construction/Traffic Management Plan or EIA is also constructive, where proposed development is bordering the River Lea.</p>	Support	No further action required
7.	Nathaniel Lichfield & Partners	Support Royal Chase removed from Green Belt.	Support	No further action required
	Garden Centre Group, owners of Enfield Garden Centre, Cattlegate Road, Crews Hill.	<p>DMD 89 Developed Sites in the Green Belt Para. 11.5.1, which provides the justification for the policy, indicates that Policy DMD 89 sets out a ‘two tier approach’ to protecting the Green Belt and delivering sustainable development. It allows for limited infilling on previously developed sites (subject to specific criteria) but indicates that the complete or partial redevelopment of previously developed sites will only be considered to be ‘appropriate’ in the case of two Major Developed Sites (Trent Park University Campus and Picketts Lock) identified within the policy and on the Policies Map. There is no national policy to support for the use of such a two tier approach set out in the National Planning Policy Framework (NPPF).</p> <p>Para 89 of the NPPF identifies six specific exceptions, the final one of which is “limited infilling or the partial or complete redevelopment of 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 existing development”.</p> <p>There is nothing contained within the Framework that suggests that a Council can elect to consider the complete or partial redevelopment of certain sites as ‘appropriate’ in Green Belt terms, whilst the redevelopment of other similar but unidentified sites would remain ‘inappropriate’.</p> <p>Accordingly, it is requested that policy DMD 89 be revised by the deletion of the words “on Major Developed Sites (Trent Park University Campus and Picketts Lock)” in order that it accords with paragraph 89 of the NPPF and accurately reflects the appropriateness of the complete or partial redevelopment of</p>	DMD 89 Unsound as inconsistent with NPPF	<p>The representor is objecting to the two tier approach, arguing that this is not NPPF compliant.</p> <p>DMD 89 should be read alongside other policies within the chapter which provide additional criteria-based approach for assessing appropriate types of development as set out in Paragraph 89 of the NPPF.</p> <p>Focused changes have been set out in the addendum.</p>

		previously developed sites within the Green Belt.		
8.	English Heritage	<p>DMD 37 Achieving High Quality Design Welcome the amendments to DMD 37 and inclusion of paragraph 6.1.3.</p> <p>DMD38 Design process Note that policy DMD 44 includes a reference to Heritage Statements. However we would suggest that paragraph 6.1.8 could be amended as suggested below so highlighting the need, when appropriate, of contacting other statutory organisations for pre-application advice. Applicants are strongly advised to take advantage of the pre-application advice service offered by the Council. <i>Where appropriate early discussions with relevant statutory consultees such as English Heritage on major heritage issues, is also encouraged.</i> This is particularly important for larger schemes, or where potential conflicts with adjoining sites or between different policy objectives are foreseen.</p> <p>DMD 49 and DMD 50 Sustainable Design and Construction Statements; and Environmental Assessment Methods In response to our previous comments, we note that the Council seeks not to make any changes to the policy or supporting text. However we would still suggest that these policies could benefit from some form of cross referencing In the absence of any reference to heritage matters in the supporting text, we would suggest that Policy CS31 Built and landscape heritage should be included as a policy that should be 'read in conjunction' with DMD 49 and 50.</p> <p>DMD 43 Tall buildings Points 1-5 - Based on our previous comments and when reviewing the wording of DMD 43 and its supporting text, we are still of the mind that the policy could be improved further. This could be achieved by spatially translating the criteria of inappropriate, sensitive and appropriate onto a map of the Borough.</p>	Not stated	<p>No further action required</p> <p>No additional change as this is covered by DMD 44.</p> <p>Additional cross referencing accepted.</p> <p>No change. Spatial Mapping of Tall Building still raised and our response: Not considered</p>

		<p>DMD 44 Preserving and Enhancing Heritage Assets Point 1 – Concerned with the insertion of the word ‘normally’ as it introduces ambiguity in the intention and application of the policy. In addition there are no details to explain in which circumstances when a proposal that does fail to conserve or enhance a heritage asset’s significance would be considered acceptable.</p> <p>Point 2 – We would advise that development affecting heritage assets or their settings should “conserve them in a manner appropriate to their significance”, and not necessarily ‘complement’. We are concerned that the current wording is insufficient in managing inappropriate developments that could cause harm to the significance of heritage assets, including their settings.</p>	Buildings Mapping	<p>possible to spatially map all of the criteria within the policy and therefore composite maps would not provide the precision that a criteria-based policy allows.</p> <p>Point 1 - Recommend deleting the word “normally”.</p> <p>Point 2 - Recommend additional wording - proposed as a focused change.</p>
9.	Highways Agency (HA)	The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. At this time we do not have any comment to make.	No comment	No further action required
10.	Thames Water	<p>DMD 56 - Heating and Cooling Include new text in the Policy DMD 56 to include a caveat that the policy’s requirements are: “subject to technical, operational and financial feasibility and other planning considerations”.</p> <p>DMD 57 – Responsible sourcing of materials etc Include new text in the Policy DMD 57 to include a caveat that the policy’s requirements are: “subject to technical, operational and financial feasibility and other planning considerations”.</p>	Unsound – various	Focused changes have been set out in the addendum in response to these representations.

		<p>DMD 58 – Water efficiency</p> <p>It is considered that the DMD policy as worded fails to adequately provide the policies that were foreshadowed in the Core Strategy, and that are required to implement the NPPF and London Plan Policy 5.14. As drafted, the DPD fails to provide explicit policy support for the provision of necessary new water and wastewater infrastructure – infrastructure that is critical to protect the environment of the London borough and to meet its growth aspirations. As a result, the DMD is not effective, nor consistent with national policy.</p> <p>Paragraph 7.22 in the supporting text to Core Strategy Policy 21 states that “The Development Management DPD will contain policies that have regard to the impact of development proposals on water demand and existing capacity”. The following wording should be added to Policy DMD 58 after ‘Greywater Collection’:</p> <p>Change 1 “Water and Wastewater Infrastructure All new development proposals will be required to demonstrate that there is sufficient water and wastewater infrastructure capacity both on and off site to serve the development or that any necessary upgrades will be delivered ahead of the occupation of development. In accordance with Core Policy 46, when there is a capacity problem and improvements in off-site infrastructure are not programmed, developers will be required to make financial and in kind contributions towards infrastructure and community facilities. The Council will work with water supply and wastewater companies and support new water supply and wastewater infrastructure improvements necessary to meet existing and future demand. Planning permission will be granted where such proposals are consistent with, or do not materially conflict with, other development plan policies.”</p> <p>Change 2: Add reference to Core Strategy Policy 46 to the last sentence in DMD 58.</p> <p>Change 3: The first sentence of DMD 58 should be amended to include the following caveat: “...all new development will be required to maximise its water efficiency subject to technical, operational and financial feasibility and other</p>		
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		<p>planning considerations”.</p> <p>Change 4: Include new supporting text to support Policy DMD 58, to be placed under paragraph 8.4.4: “The Council will also seek to ensure that there is adequate water and foul drainage capacity to serve all new developments to avoid any adverse amenity impact. The developer will be required to demonstrate that there is adequate infrastructure both on and off the site to serve the development and that it would not lead to problems for existing users or future occupiers. In some circumstances a water supply and / or drainage strategy will need to be produced by the developer in liaison with Thames Water to ensure the appropriate upgrades are in place ahead of occupation of the development.</p> <p>Where there is a capacity problem or potential adverse amenity impact on future occupiers, and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund in full the appropriate improvements which must be completed prior to occupation of the development.’ A major upgrade is being planned for the Deephams Sewage Works during the plan period, to meet new environmental standards and to accommodate growth within the catchment. The principal of the upgrade is supported as being necessary to deliver infrastructure to meet existing and future wastewater demands.”</p> <p>DMD 59 - Avoiding and Reducing Flood Risk Whilst Thames Water supports the changes made by LB Enfield in the Submission Draft DPD (as compared to the earlier draft), it is considered that the policy wording still does not go far enough to provide explicit policy guidance on the potential for sewer flooding.</p> <p>Without the inclusion of such wording it is considered that the DMD is unsound as it is not effective – as there is insufficient policy security to ensure that new development will not lead to sewer flooding, or that the issue will expressly be considered through application for planning permission.</p>		
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		<p>DMD 60 Assessing Flood Risk It is proposed that the policy text for DMD 60 under section 2 ‘Additional requirements for non-fluvial flooding’ is amended to add a new bullet ‘b.’ as follows: “b. Development proposals will need to demonstrate through a drainage strategy, that down-stream flooding of the sewer or combined sewer network will not occur as a result of the development or if flooding will occur as a result of the development, appropriate mitigation will be proposed to address the flooding.”</p> <p>DMD 61 - Surface Water Support.</p> <p>DMD 64 – Pollution control and assessment As currently drafted DMD 64 is not sufficiently clear to enable it to be satisfactorily implemented through the development management process. It is proposed that word “minimised” is replaced with “reduced”.</p> <p>DMD 65 – Air Quality Amend Policy DMD 65 part 3 to require a technical assessment that should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned to ensure that any potential for adverse amenity impact can be avoided/mitigated.</p> <p>DMD 68 – Noise In relation to Point 4, the Policy states that development involving noise generating uses would only be permitted in locations where there is compatibility with existing uses. Whilst the intentions of the policy to limit the impact of noise generating uses is supported, it is considered that the policy wording is too restrictive to be capable of being applied in a highly developed London Borough such as Enfield, where residential, leisure, industrial and other uses are frequently located adjacent to each other</p> <p>Proposed amendment to Part 4 of the policy to read (change shown): “4. Development involving potential noise generating development will only be permitted in appropriate locations, where there is compatibility with existing uses and no adverse impact on amenity”</p>		
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		<p>Part 5, requires where appropriate, an improvement of 10dB on background noise levels. However, the wording of paragraph 9.4.3 of the supporting text includes clarification that where this is not possible the Council will consider what level of improvement could be achieved. The flexibility in the supporting text is welcomed, however it is considered that more flexible wording should be included in the policy wording itself, by reference to an agreed standard such as the WHO Guidelines on Community Noise, to provide certainty to applicants and consultees alike.</p> <p>Proposed amendment to Part 5 of the policy to read (revised wording shown):</p> <p>“Proposals for plant and machinery that result in significant harm to amenity will not be permitted. Developments must not contribute to cumulatively higher noise levels and, where practicable, must be designed to achieve no increase to background levels. Where this is not practicable developments should be designed to meet WHO Guidelines on Community Noise.”</p> <p>DMD 82 – Protecting the Green Belt Criterion (d) as currently drafted states the following: “d. Existing trees, hedges, bushes and other natural features are retained and integrated with the scheme to ensure adequate screening” Thames Water considers that the policy wording is insufficiently flexibly worded. The policy wording should be amended to include flexibility for circumstances where some features are removed, but their removal is mitigated. It is proposed that bullet ‘d’ of this policy is amended to read as follows: “d. Where possible, existing trees, hedges, bushes and other natural features are retained and integrated with the scheme to ensure adequate screening. Where this is not possible, planning permission will only be granted if adequate mitigation measures are secured.”</p> <p>Glossary - DMD 39 – The design of business premises Glossary. Thames Water made representations against the Draft Policy as no definition of the term “business premises” was included in the Draft DMD.</p> <p>LB Enfield has now included a definition of the term in the glossary, however Thames Water now objects to the wording as it explicitly includes “utility</p>		
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		<p>company premises” within the definition of business premises to which the provisions of Policy DMD 39 would apply.</p> <p>The approach taken to the definition of business premises is different from that taken to the definition under the CIL Regulations, where there is an explicit recognition that there are some buildings that people do not work within or enter on a regular basis, other than for operation maintenance and emergencies. Many of Thames Water’s own premises fall into this category and it is considered that the Policy wording or glossary needs to be amended to explicitly exclude utility buildings and buildings into which people do not normally enter on a regular basis from the definition of “business premises”.</p> <p>Change - Either:</p> <ol style="list-style-type: none"> 1. Amend the wording of Policy DMD 39 to remove reference to utility buildings and make clear that the policy only applies to business premises into which people enter on a regular basis; or 2. Amend the wording in the Glossary to explicitly exclude premises into which people would not regularly enter from the definition of “business premises. 		
11.	Banner Homes	<p>DMD 7 Development of Garden Land</p> <p>The LPA has significantly changed the policy wording in the proposed Submission Draft (There is now no presumption against development on garden land. A criteria based policy is proposed, informed by character, amenity space etc. This revised approach is more pragmatic and I have no further comments to make at this stage.</p>	Support	No further action required
12.	Southgate District Civic Trust (SDCT)	<p>SCDT have concentrated on DMD 1 - 88, and Appendix 4,5 & 6 regarding Standards for New Development. We support the policies therein and hope that until the document is adopted the policies proposed will be used as assessing current as well as future planning applications because they are policies that have always been relevant in our opinion.</p> <p>SDCT single out as an example DMD33 - (the Impact of Betting Shops) and Council planning policy relating to a Town Planning application for a Betting Shop in a Conservation Area (Southgate Circus directly opposite a Listed station) and how it would affect that application. Presumably it would have been refused in accordance with the policies in the proposed DMD. It is with this hope that we support the policies. The use of " depending on special circumstances",</p>	Support	No further action required

		is noted in the document when a policy will be implemented, but does not specify what types of special circumstances, and this should not be left open to abuse of the situation.		
13.	Theatres Trust	<p>DMD 16 Provision of New Community Facilities Support DMD 16 as it will provide for new community facilities and paragraph 3.1.1 includes culture and arts facilities.</p> <p>DMD 17 Protection of Community Facilities Support as it will protect community facilities, and criteria for the evening economy.</p> <p>Table 5.1 Support including sui generis types in Table 5.1 and the Glossary, however this non-Use Class.</p>	Support	No further action required
14.	Metropolitan Police Service (MPS) & Mayor's Office for Policing and Crime (MOPAC)	<p>DMD 16 Protection of Community Facilities The MOPAC support part a. of this policy which allows the loss of a community facility where a suitable replacement facility is provided that maintains the same level of public provision and accessibility.</p> <p>Paragraph 3.1.9 The MOPAC object to the requirement at paragraph 3.1.9 that evidence will be required of marketing. This conflicts with the Policy which highlights either the provision of a replacement facility or evidence of marketing. Recommendation: Paragraph 3.1.9 - The loss of facilities will be allowed only in exceptional circumstances. <i>Where a suitable replacement facility that meets the criteria at DMD 17a isn't provided and the loss doesn't form part of a published publicly consulted upon estate strategy,</i> evidence will be required of marketing and consultation with the community to demonstrate that there is no demand for existing or alternative community uses.</p>	Support Object in part	No further action required No change - the suggested change is specific to the requirements of the MOPAC. Generally the requirements to evidence marketing and consultation with the community will be applicable in most circumstances. Where 'other' forms of evidence are available, such as an Estate Strategy, the policy and paragraph 3.1.9 provide flexibility for this

		<p>DMD 19 Strategic Industrial Locations The previous representation sought flexibility in allowing certain sui generis uses, such as policing uses with similar characteristics to B Class Uses, to be supported on SIL's and PIL's which may assist in the MOPAC meeting their Estate Strategy objectives.</p>	Unsound	<p>consideration.</p> <p>DMD 19 refers to type of uses appropriate for SIL and not use classes. Any such proposals would be assessed alongside relevant policies including London Plan policies.</p>
15.	GLA	<p>The Proposed Submission document DMD is not considered to be in general conformity with the London Plan in relation to the Council's position on affordable housing.</p> <p>Chapter 2 : Housing DMD 1 Affordable Housing Paragraphs 2.1.3 and 2.1.4 Proposed submission document is not in conformity with the London Plan in respect of affordable housing, in particular in relation to paragraphs 2.13 and 2.1.4.</p> <p>Paragraph 2.1.3 – Enfield Council has not supplied any evidence to support the following statement: “but could also impact on the affordability for low income families. Those in receipt of benefits will be particularly affected by the current proposed welfare reform proposals which would cap the total amount of benefits received depending on employment status making this tenure less affordable”. Many of those on benefit will not be affected by the benefit cap because they are in work or of pensionable age, moreover welfare reform will impact on a wide range of people, not just those in affordable rent. The statement should therefore be deleted.</p> <p>Paragraph 2.1.4 – The paragraph details what the borough suggests is affordable for local residents and could be interpreted as attempting to cap rents. The London Plan and the Revised Early Minor Alterations are clear that rent caps should not be imposed as they impede the maximisation of affordable housing delivery. They could restrict the overall numbers of units delivered for viability reasons, which would be contrary to the intent of the NPPF and out of general conformity with the London Plan Policy 3.11. The GLA Affordable</p>	Non Conformity re. Affordable Housing	<p>The key considerations in terms of Affordable Rented Tenure affordability for Enfield residents remain, particularly the need to provide affordable family homes. Paragraphs 2.13 and 2.14 reflect Enfield's local affordability needs.</p>

		<p>Homes Programme for 2011-2015 is ensuring that affordable rent family housing is at or near target rent; this is a matter for housing investment rather than planning policy. To avoid that rent caps are imposed via planning policy, it is suggested that the entire paragraph 2.1.4 be deleted.</p> <p>Chapter 7 Transport & Parking DMD 45 Parking Standards and Layout Sets a tone which could encourage car parking provision within all development proposals regardless of their location, nature and scale. This is not consistent with the overall emphasis of London Plan Policy 6.13.</p> <p>Should be reworded to read: Point 1 “Car parking proposals will only be considered against the standards set out in the London Plan and:”</p> <p>At Point 4 – “Residential developments providing parking below London Plan Standards will only be considered if the site” TfL Consider rewording to encourage rather than discourage low car parking provision.</p> <p>At Point 5 As TfL previously stated, Car Clubs should be encouraged for all development proposals not only those where lower parking provision is proposed.</p> <p>DMD 45 –TfL wish to see direct reference made to the need for active and passive provision for electric vehicle charging points to be made within development proposals.</p> <p>Chapter 9 Environmental Protection DMD 67 Hazardous Installations Does not fully comply with the provision of London Plan Policy 5.22 Hazardous Substances and Installations, particularly with Clause Bb which states that “risks to people and the environment should be balanced with the benefits of development and that existing patterns of development should be taken account of.” It should also take into account the London Plan Revised Early Minor</p>		<p>DMD 45 – changes proposed via addendum of focused changes.</p> <p>DMD 67 - changes proposed via addendum of focused changes.</p>
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		Alterations which states that “Boroughs should also periodically review consents granted under Planning (Hazardous Substances) Act 1990 to ensure they reflect current conditions and the physical capacity of the site.” Appendix 12 of the development management document on hazardous installations may need to be amended accordingly.		
16.	Wildstone Planning On behalf of Trent Park Golf Club	<p>DMD 28 – Local Centres and Local Parades and Proposals Map The Oakwood Large Local Centre, as defined on the proposals map currently excludes Trent Park Golf Club. The current boundary ignores the fact that the Golf Club and its ancillary facilities operate as part of the Local Parade with linked trips occurring between the two. The Golf Club's car park is also utilised by people using the Oakwood Parade. It is considered that the Plan is currently unsound and the boundary of the Oakwood centre needs to be altered to include the Golf Club car park and clubhouse.</p> <p>DMD 32 – Managing the Impact of Food and Drink Establishments. The proposed policy is currently inflexible in that it only permits food and drink uses within identified centres. This fails to acknowledge that there are circumstances where food and drink uses are appropriate outside of centres such as at Golf Clubs or other sporting facilities and in its current form the Policy is unsound and unjustified. Provided that proposals meet the criteria based part of the policy then there is no reason why they should not be acceptable. The wording of the Policy should therefore be changed from the current “will only be permitted” to enable further discretion and individual sites’ circumstances to be considered (i.e. the word “normally” or “typically” should be inserted).</p> <p>DMD 89 – Previously Developed Sites in the Green Belt The criteria based Policy in its current form is inconsistent with National Policy. The NPPF simply requires that extensions or alterations are not disproportionate to the size of the original building. The reference in criteria 2a is far too prescriptive, a more balanced judgment is needed to determine whether a design is acceptable in aesthetic terms in the Green Belt (i.e. additional height may be needed to improve the appearance of the building). The policy is unsound and needs to be reworded to reflect the guidance in the NPPF.</p>	Unsound Unsound Unsound	No change – the boundary reflects DMD evidence base and is considered NPPF compliant. DMD 32 – changes proposed via addendum of focused changes. DMD 89- The criteria is NPPF compliant, however the Council accepts some changes via the addendum of focused changes
17.	Natural England	Natural England welcomes the fact that the comments made in our last communication with Enfield (dated 27th July 2012) now form part of the Sustainability Appraisal (SA). The elements mentioned; including Climate;	Support	No further action required

		Biodiversity; Green Infrastructure and Open Space Implementation are what we would expect to see and as such no further comments need to be made over and above our last correspondence. The fact that these have been integrated into the SA as mentioned and is encouraging as all the aspects of the NPPF such as paragraph 118 are thus covered.		
18.	Universities Superannuation Scheme	<p>DMD 25. Locations for New Retail, Leisure and Office Development. To reflect wording in paragraphs 24-27 of the NPPF. The NPPF impact test is 'significant adverse impact'. There is also no NPPF requirement for development to increase the overall sustainability and accessibility of locations. Re-word policy DMD25 as follows:</p> <p>1. Locations for New Retail, Leisure and Office Development</p> <p>i. Main and bulk convenience, comparison shopping, food and drink uses and major leisure and office development.</p> <p>ii. If no sites are suitable or available within the town centres listed in part a. i. of this policy for the development proposed, then retail development at edge of centre locations that are well connected to and up to 300 metres from the primary shopping area will be permitted.</p> <p>iii. New development within the boundary of the Council's existing retail parks of Enfield retail park, DeManderville Gate, Ravenside and Angel Road (as defined in the Core Strategy and on the Policies Map) and outside of the town centres will only be permitted if the applicant can demonstrate to the Council's satisfaction that a sequential test has been applied which shows no suitable sites available within or on the edge of the town centres. Furthermore, a retail impact assessment should demonstrate that the development is not likely to have a negative impact to the viability and vitality of Enfield's centres or planned investment in centres and that the development increases the overall sustainability and accessibility of the retail park in question. 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 i. 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.</p>	Not stated / Unsound	<p>DMD25 continues to be NPPF Compliant. NPPF still promotes a town centres first approach which is the approach in DMD 25.</p> <p>Focused changes to DMD 25 1(a) accepted.</p> <p>Focused changes to DMD 25 1(a) (ii) accepted.</p> <p>Focused changes to DMD 25 1(a)(iii) accepted only in part.</p>

		Delete part iv and v of the policy is superfluous. The stance in part v of the policy is not in accordance with the NPPF.		Focused changes to DMD 25 1 (a) (iv) not accepted. Picketts Lock remains a key leisure destination and it is appropriate to include this point within the Policy. 1(a) (v) Deletion accepted.
19.	Planning Potential on behalf of Scottish Widows Investment Partnership – owners of Ponders End Industrial Estate and Graftongate – development Partner. Only recently become involved in this site.	<p>DMD 16 – Community Facilities As a requirement of development in SGAs - this part of the policy is unclear, unreasonable in parts and does not fully accord with Core Strategy Policies 7, 8 and 11.</p> <p>DMD 19 – Strategic Industrial Land Object to part of Ponders End Industrial Estate being removed from SIL</p> <p>DMD 21 Complementary uses within SIL and LSIS Supportive of Part 1 and generally supportive of Part 2 however the maximum of 10% retail is unrealistically low and suggest a figure of 25%</p> <p>DMD 23 – New Employment Development 1a) There is no adverse impact as a result of noise and disturbance, access, parking and servicing in the area;</p> <p>By virtue of being designated SIL or LSIS it has already been established that industrial development within the area would not have an adverse impact as a result of any of the reasons set out in criterion a.</p>	<p>Not stated object</p> <p>Object to loss of SIL.</p> <p>Object</p> <p>Object</p>	<p>DMD 16 – focused changes proposed.</p> <p>SIL de-designation was accepted as part of the Core Strategy adoption. The DMD does not provide any further evidence to justify re-designating the southern part of the estate as SIL.</p> <p>No change - the comments made on criterion 1a are not accepted; industrial sites do not sit in isolation of other land uses and often are in close proximity to residential areas. Given this, the diversity of uses and the operational requirements of businesses accommodated within SIL</p>

		<p>1b) The accommodation is flexible and suitable to meet future needs and requirements of local businesses and small firms, where appropriate.</p> <p>Suggest 1b) is deleted as industrial buildings may need to be designed to meet operational need and as a bespoke building would not be flexible or suitable for the needs of others. While the words ‘where appropriate’ are included, suggest criterion be deleted because it is a clear requirement that <u>all criteria must be met</u>.</p> <p>DMD 38 Design & Heritage The requirement for Design & Access Statements is beyond the remit of this policy, particularly at points 1 ad 2 . Point 3, Material weight being given to the advice of design review panels is also beyond the remit of this document. DMD 38 should be deleted.</p> <p>DMD 39 The Design of Business Premises Policy is excessively onerous. For example if a business promotes industrial investment but requires a bespoke operational design that is unlikely to be flexible it wold fail criterion f, and therefore fail the whole policy.</p> <p>DMD 54 Allowable solutions Is in direct conflict with Governments current consultation on allowable solutions. And may require amendment to reflect outcome of Governments consultation.</p>	<p>Soundness</p> <p>Soundness</p> <p>Soundness</p>	<p>and LSIS it remains important that DMD 23 sets out the appropriate considerations. Criterion 1b allows sufficient flexibility by virtue of stating “where appropriate” and therefore its deletion is not supported.</p> <p>DMD 38 – focused changes proposed.</p> <p>DMD 39 - focused changes proposed.</p> <p>DMD 54 no change – the policy is not in direct conflict as the consultation relates to the 2016 change to zero carbon and this has yet to be decided. The preferred option so is a market led allowable solutions mechanism although the potential of Local Authorities to act as a provider of allowable solutions has not necessarily been</p>
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		<p>DMD 55 Use of rood space / vertical surfaces The policy requirements for new / major development will in some instances for example B8 premises result in buildings unsuited to their intended purposes. Green roofs add additional weight and would be contrary to the minimal internal structure required to maximise racking space. Warehouse spaces are typically unheated spaces and the best opportunity to reduce energy consumption is through the use of roof lights, a green roof requirement would prevent the use of cost-effective roof lights. The policy introduces additional maintenance.</p> <p>DMD 75 Waterways A considerable amount of Enfield’s SIL is located next to the River Lee. In the case of Ponders End Industrial Estate it would not be possible to achieve a workable layout fronting the river without also introducing new roads and parkin. Therefore difficult to understand how the detailed objectives of this policy can be fulfilled.</p> <p>Policies Map Whilst recognising amendments to the Proposals Map were endorsed through the Core Strategy, it is understood the Council is currently accepting representations on the draft DMD policies Map. As new owners SWIP and Graftongate a seeking to regenerate the whole of Ponders End Industrial Estate and would encourage the LPA to return the southern section of Estate back to an industrial allocation.</p>		<p>discounted. The range of options available could have a number of impacts although the thrust of the policy would still broadly comply. An amendment at this stage would be premature.</p> <p>DMD 55 no change -the Policy clearly states that this is “subject to technical and economic feasibility and other relevant planning considerations”.</p> <p>DMD 75 no change - the overall objectives of the policy would still apply notwithstanding any exceptional circumstances that maybe specific to individual sites.</p> <p>As above for DMD19.</p>
20.	Canal & River Trust	<p>DMD 75 - Waterways Additional clarity sought. Policy should be amended to read “Permanent residential or commercial moorings on the River Lee Navigation will be permitted provided...”</p>	Comment	DMD 75 – Focused changes proposed.

21.	Network Rail	<p>DMD 19 Strategic Industrial Locations Throughout the country Network Rail is developing schemes that allow for the retention of existing B Uses but additionally incorporate other use(s) above e.g. residential accommodation. This allows Network Rail to maximise their assets which fundamentally provide an income that is reinvested back into railway infrastructure. Recommend that an additional section is added to Policy DMD19 which states that provided the existing B Use is retained, mixed uses schemes will be considered within these strategic industrial locations, many of which are allocated adjacent to Network Rail land.</p> <p>DMD 45 – Parking Where there are existing structures surrounded by limited amenity space, such as railway arches, it will not always be possible to provide provisions for disabled parking as part of the redevelopment of a site in accordance with Policy DMD 45. As such it is recommended that an additional section is added to section 4 of Policy DMD 45 which states that if the Public Transport Accessibility Level (PTAL) of a site is at Level 4 or above and disabled access is available at the nearest train station, car free schemes will be permitted for these types of development.</p>		<p>DMD 19 - suggested change is not considered necessary. SIL is principally designated for employment generating uses, therefore, the request to include flexibility to accept non-employment generation uses on Network Rail land is not considered appropriate and would be in conflict with London and Local Plan policies.</p> <p>DMD 45 - The additional flexibility within the Policy is not accepted and is contrary to London Plan and Core Policy.</p>
22.	LVRPA	<p>The Authority considers the Proposed Submission DMD to be unsound as there is no policy within the document to help guide appropriate development within the Park. This undermines the effectiveness of the DMD and the future deliverability of strategic priorities around North East Enfield, Central Leaside and Meridian Water and opportunities for joint working in relation to the Park.</p> <p>The Authority welcomes the support provided for the Regional Park at a strategic level in the Core Strategy and will be seeking the incorporation of more detailed site specific proposals in Area Action Plans and Planning Guidance. However it is still necessary to include development management policy guidance for the whole Park area within Enfield (approximately 653 hectares) to ensure that the Park's leisure and ecological resources are both protected and appropriately developed in accordance with its remit and the recently adopted Area proposals.</p>	Soundness	The DMD is not the appropriate local plan document to set out individual site specific policies. Where relevant and appropriate future Local Plan documents will cover the level of detail sought from the proposed LVRPA policy and put forward in this representation.

		<p>DMD 75 Waterways Whilst this extra provision is supported, the Authority’s original concern about the term ‘permanently moored vessels’ has not been resolved and as it stands would allow for residential moorings in the Park. An addition to the Glossary by the Council confirms that Permanent Moorings includes residential moorings. The Authority notes the redrafting of policy which addresses transportation of freight. This now offers support for development which maximises transportation of freight by water. This redrafting does not however address the Authority’s concern about the need to take account of existing and future leisure use of the waterways. Policy reworded as follows: Development which maximises transportation of freight by water will be supported provided due consideration is given to the leisure use of the waterways.</p>	Soundness	DMD 75 –Focused changes proposed.
23.	Legal & General National Grid	<p>This representation relates to the Western Gateway site which is owned by Legal & General & National Grid.</p> <p>Chapter 5 Town Centres & Shopping DMD25 New Retail, Leisure & Office Development As currently drafted is potentially unsound as it is not consistent with national policy set out in Framework.</p> <p>Policy DMD 32 Managing the Impact of Food and Drink Establishment Want greater flexibility in terms of the location of such establishments i.e.- in Area Action Plan locations – therefore suggest deleting the word ‘only’.</p>	DMD 25 Unsound Inconsistent with NPPF	<p>DMD25 continues to be NPPF Compliant. NPPF still promotes a town centres first approach which is the approach in DMD 25.</p> <p>Focused changes to DMD are set out in the addendum.</p> <p>DMD 32 - agree to delete the word “only” to acknowledge the degree of flexibility sought.</p>

24.	LFEPA Edmonton/Enfield & Southgate Fire Stations.	<p>DMD 16 Community Facilities</p> <p>DMD 17 Protection of Community Facilities</p> <p>In both policies emergency services are included as examples of community facilities however; fire fighting facilities are classed as community facilities but often not accessible to the public.</p>	Comment only	Noted, however paragraph 3.1.1 does list and detail examples of community facilities. Further clarity is not considered necessary.
25.	Environment Agency	<p>DMD 55 Use of Roofs Pace / Vertical Surfaces</p> <p>We strongly support the inclusion of this policy to increase the use of green roofs and walls in Enfield.</p> <p>DMD 58 water Efficiency</p> <p>We strongly support the inclusion of this policy, and are pleased that the Council has included positive targets for water efficiency.</p> <p>DMD 59 Avoiding and reducing Flood Risk</p> <p>We believe that the wrong DMD policy number has been quoted at the end of section 1 a) of the policy. This should reference DMD60, not DMD62. EA suggest you remove “in consultation with the Environment Agency” from the final paragraph, as in the near future you will be taking over responsibility for reviewing SuDS, in your role as SuDS Approval Body. Therefore the Environment Agency will no longer be consulted. This does not alter our current role to review surface water drainage for all sites over one hectare in size. We suggest that you alter the end of the last paragraph to read “... or result in, unacceptable levels of flood risk on site or increase the level of flood risk to third parties.”</p> <p>DMD 60 Assessing Food Risk</p> <p>We strongly support this policy; particularly part f) which states the criteria that should be met to pass the Exception Test.</p> <p>Paragraph 8.5.7</p> <p>There is a typo in the second line that has changed the meaning of the sentence. In part of the sentence: “...unless there is a clear justification or an alternative...” – the word “or” should be replaced with “for”.</p> <p>DMD 61 Managing Surface Water</p>	<p>Support</p> <p>Support</p> <p>Comment</p> <p>Comment</p> <p>Comment</p>	<p>No further action required</p> <p>No further action required</p> <p>DMD 59 - amend policy to correct cross-referencing and revise the final paragraph.</p> <p>No further action required</p> <p>DMD 60 typographical correction agreed.</p> <p>Designing for a 1 in 1 year</p>

		<p>Section 9.6 (accompanying text) The justification and guidance should include WFD. Many of the actions in the WFD relate to water quality and this legislation is of key importance.</p> <p>This policy on waterways makes no reference to the ecological value/character of the waterways in Enfield. It focuses principally on access. A sentence could be added here to say that access is encouraged provided that there is no adverse ecological impact and the ability of the waterbody to meet its WFD targets is not inhibited - this will be established through WFD screening before work is approved.</p> <p>Under the “moorings” section, we request that an additional criterion is added to the list. This is to ensure that any new residential moorings do not put the occupants or others at increased flood risk, for example providing safe access and egress: “e. There is no increase in flood risk.”</p>	<p>Change</p>	<p>DMD 70 focused changes proposed.</p>
<p>26.</p>	<p>Sport England</p>	<p>DMD 74: Playing Pitches. The use of the words ‘sports pitches’ rather than ‘playing field’ is unhelpful and unclear. A sports pitch comprises white markings to denote the areas of play of a particular sport. These pitch markings are subject to change on a regular basis, particular summer and winter when different sports are played and also during seasons. Therefore the term ‘sports pitch’ does not adequately define the site or area that the policy seeks to protect. The implication of this wording is that development on an existing playing field would be acceptable if no pitches happened to be marked out at the time of applying for permission. This policy is therefore unclear.</p> <p>The policy should be amended to read as follows; Point 1 “... Development involving the loss of playing field land sports pitches will not be permitted...”</p> <p>Point 2 of the should also be amended to read: “...The preference for new playing field land sports pitches is natural grass pitches...”</p>	<p>Object – Not stated</p>	<p>DMD 74 - the suggested wording for Parts 1 and 2 of DMD 74 are accepted, and proposed as focuses changes. However, Part 4 should remain. ‘Appropriate’ development is undefined within paragraph 89 NPPF and furthermore the NPPF is silent of Floodlighting. On this basis Part 4 is still compliant and provides clarity over what the Local Plan would consider inappropriate development - “by definition harmful to the Green Belt and should not be approved except in</p>

		<p>Point 4, Sport England would like to remind Enfield council of the wording of the paragraph 89 of the NPPF which replaces the term 'essential facilities' with 'appropriate facilities' for outdoor sport and outdoor recreation. Floodlighting should therefore not be considered as inappropriate development 'as standard'.</p> <p>Sport England would suggest the bullet 4 be omitted from the policy altogether.</p>		<p>very special circumstances", paragraph 87 of NPPF.</p>
27.	IKEA Properties Investment Ltd	<p>No direct soundness objection stated however following comments made:</p> <p>Chapter 5 Town Centres 7 Shopping DMD25 New Retail, Leisure & Office Development Too restrictive and therefore not consistent with greater flexibility given in NPPF) Employment policies Too restrictive in seeking to protect traditional employment type uses.</p> <p>Energy/Environmental policies DMD 55 Use of Roof Space / Vertical Surfaces Too restrictive. Suggest the word 'required' should be replaced with 'encouraged'</p>	<p>DMD 25 Not stated - however does read like soundness rep</p>	<p>DMD25 continues to be NPPF Compliant. NPPF still promotes a town centres first approach which is the approach in DMD 25. The policy has however been revised in response to representations.</p>
28.	Costco Wholesale UK Ltd	<p>DMD 19 Strategic Industrial Locations Should be amended to recognise sui generis uses are also suitable on SIL. In addition sui generis is also suitable at Great Cambridge Road Industrial Business Park and Locally Significant Industrial Sites.</p>	<p>Not stated.</p>	<p>No change as there is sufficient flexibility provided at Point C in DMD 19 which recognises 'other employment generating uses'.</p>
29.	A C Nicholas	<p>DMD 1 Affordable Housing</p> <p>The policy should explicitly state that a lower level of affordable housing will be accepted when development viability justifies it. There should be the following clause 'c. the financial viability of the proposed development' The policy should also be amended as follows; 'Subject to requirements to provide a contextual and sustainable design and the management requirements of the registered social landlord, tenure should be spread throughout the development to prevent concentrations or clear distinction.</p>	<p>Soundness issue not stated, however a number of suggested changes are put forward.</p> <p>Object</p>	<p>DMD 1 in conjunction with the adopted Core Strategy, London Plan and NPPF provide sufficient flexibility with regards to feasibility and viability.</p> <p>DMD 2 in conjunction with</p>

		<p>Paragraph 2.3.3 The final sentence is too prescriptive and should be deleted.</p>	Object	appropriate.
		<p>DMD 5 Residential Conversions The figure of 20% in criterion b. is arbitrary and too prescriptive. It is contrary to London Plan Housing SPG that advises that locally restrictive policies, including those based on 'conversion quotas' should not be applied along transport corridors or within reasonable walking distance of a town centre without a robust justification. Criterion 2 should be prefaced with 'Where the constraints of the site and the character of the locality permit...'</p>	Object	The 20% threshold and 1 out of a consecutive row of 5 is a local standard that the Council would apply to assess whether the development would result in an excessive number or cluster of conversions that would affect the character of a street/road. Further clarity on what is considered 'adequate' is provided in supporting text in paragraph 2.3.9 and other supporting DMD policies such as DMD 45 Parking Standards and Layouts
		<p>Paragraph 2.3.8 There should be no general presumption against the conversion of single dwellings into flats in Conservation Areas. Each proposal should be judged on its merits.</p>	Object	
		<p>Paragraphs 2.3.10 & 2.3.11 These paragraphs should be deleted.</p>	Object	
		<p>DMD 6 Residential Character The second sentence of the first paragraph should be amended to read: “ Development will only be permitted if it complies <u>in general</u> with the London Plan density matrix and the following criteria are met...”</p>	Suggested Change	DMD 6 - the additional wording adds greater ambiguity and is not considered appropriate

		<p>DMD 8 General Standards for New Residential Development This policy is too prescriptive. The first sentence should read: New residential development will only normally be permitted if all of the following relevant criteria are met. All development should:</p> <p>The individual criterion should read as follows: d. Normally meet or exceed minimum space standards in the London Plan and London Housing Design Guide e. Provide a well-designed, flexible and functional layout, with adequately sized rooms in accordance with having regard to the London Housing Design Guide.</p> <p>DMD 9 Amenity space Criterion b should read: Is not significantly overlooked by surrounding development Criterion d should be deleted.</p> <p>Paragraph 2.4.17 This should be amended as follows: The minimum requirement will normally represent an acceptable standard of provision on all sites, but there will be cases where new development will be required to provide more amenity space, such as when the development is within an area with identified open space or play deficiencies, or where amenity space makes a greater contribution towards setting and the character of areas, having regard to Conservation Area Appraisals and the Characterisation Studies. However, any units which are below the minimum standard will not normally be acceptable.</p> <p>Policy DMD 22 Loss of employment Outside Designated Areas Proposals involving a change of use that would result in a loss or reduction of employment outside of Strategic Industrial Locations (SIL) or Locally Significant Industrial Site (LSIS) will be refused, unless it can be demonstrated that the site is no longer suitable or viable for its continued use.</p> <p>Paragraph 4.5.3 This paragraph imposes an onerous burden and should be deleted.</p>	<p>Suggested Change</p> <p>Suggested Change</p> <p>Suggested Change</p> <p>Suggested Change</p> <p>Suggested Change</p> <p>Object</p>	<p>The suggested changes in wording are not considered to add any additional clarity to the policy approach</p> <p>DMD 9 no change - criterion d. is considered appropriate, communal space should be managed in order to be maintained to benefit long term enjoyment.</p> <p>No change - the addition of the words "will normally" is not considered appropriate. A minimum standard of provision is necessary to ensure that any amenity space provided is functional.</p> <p>DMD 22 - the change is not accepted as both tests of non-suitability and non-viability need to apply as part of the consideration to accepting the loss of employment uses. Market demand and viability assessments are</p>
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		<p>Section 4.6 This section should not apply to sites outside of SILs or LSISs.</p> <p>DMD 38 Design and Heritage Criterion 2 is overly onerous and should be amended to read: The Design and Access Statements must meet national requirements and include: should meet national requirements as set out in relevant legislation and circular advice.</p> <p>Paragraph 6.1.11 This goes beyond national requirements and should be deleted.</p>	<p>Object</p> <p>Suggested Change</p> <p>Object</p>	<p>required to prevent the loss of employment uses outside of designated areas. The requirements are not considered to be overly onerous and are supported by Core Strategy and London Plan Policy. The inclusion of this paragraph is considered to provide clarity over the Council's expectations in considering such proposals.</p> <p>DMD 38 no change - the suggested revision would delete sub-criteria (a-c) and would not provide the level of clarity the criterion specifically seeks to set out for planning applications. The Policy is intended to ensure Design and Access Statements are useful</p> <p>No Change - the requirement for Design and Access statements to assess proposals against criteria in DMD 37 is considered entirely reasonable and should ensure Statements are</p>
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		<p>DMD 45 Parking This should be amended as follows: Residential developments providing parking below London Plan Standards will only normally be approved if the site....</p> <p>DMD 49 Sustainable Design and Construction Statements The reference to 'all development' is unduly onerous. The requirement should differentiate between householder, minor and major development.</p>	<p>Suggested Change.</p> <p>Suggested Change.</p>	<p>meaningful. Applications will be assessed against all Local Plan policies therefore placing the assessment within a Design and Access Statement continues to be a logical requirement. The paragraph is appropriately cross referencing to relevant policy objectives within the DMD that will also be a consideration in the design review process.</p> <p>DMD 45 no change - substituting the words "be considered" with "be approved" is not considered appropriate as other local plan policies will need to be considered before an application is "approved". Inserting the word "normally" adds no further clarity to the Policy.</p> <p>DMD 49 no change - the requirements of DMD 49 are set out in Appendix 3 and this states within the first sentence that the scale and scope of such statements will be determined on a site by site basis</p>
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		<p>DMD 51 Energy Efficiency Standards The reference to 'all development' is unduly onerous. The requirement should differentiate between householder, minor and major development.</p> <p>DMD 72 Open Space Provision This should be amended as follows: 'Where appropriate, new major residential development should be accompanied by proposals to improve open space provision. The nature of such improvements should reflect any additional open space needs generated as a result of the proposed development. The final sentence (The applicant will be required to make a contribution towards the enhancement of open space or associated facilities) should be deleted as this will not always be necessary.</p> <p>DMD 74 Playing Pitches This should be amended as follows: 1. Development involving the loss of sports pitches will not be permitted unless special circumstances apply.</p>	<p>Suggested Change.</p> <p>Suggested Change.</p> <p>Object</p> <p>Suggested change</p>	<p>DMD 51 no change - the requirements for all development to submit Energy Statements is in accordance with Local and National policy and standards. This is to be submitted as part of a developer's obligation to submit a Sustainable Design and Construction Statement, the detailed requirements of which are set out in Appendix 3. Appropriate flexibility is given to determining the level of detail required</p> <p>DMD 72 - the change is not accepted as it does not add any additional clarification to the policy approach.</p> <p>DMD 74 no change - the policy objective to protect Enfield's sports pitches apply and therefore by adding the suggested flexibility to the wording of policy would be inappropriate.</p>
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		<p>DMD 77 Green Chains This should be amended as follows: Major development within a 5 minute walk or 400 metre radius from a Green Chain must integrate with the network and development will only be permitted if....</p> <p>DMD 83 Development Adjacent Green Belt This should be amended as follows: a. There is no harm to the green belt by reason of any increase in the visual dominance and intrusiveness of the built form by way of height, scale and massing.</p> <p>DMD 89 Previously Developed Sites in the Green Belt This should be amended as follows: 1. Complete or partial redevelopment of sites will only be permitted on previously developed land and where the proposal improves the character and appearance of the site and appearance from the surrounding Green Belt. New development must not have a greater impact on the openness of the Green Belt than the existing development. Criterion 2 should be deleted in its entirety. It is too prescriptive and partially covered by criterion 1 and other policies.</p> <p>Appendix 4 This should be amended as follows:</p>	<p>Suggested change</p> <p>Suggested change</p> <p>Suggested change</p> <p>Suggested change</p>	<p>Applications that result in the loss of sport pitches would have to justify an exception to DMD 74 and Core Policy 34.</p> <p>DMD 77 no change - the intention of the policy is for all development to contribute as appropriate in facilitating access to open space and nature as set out on paragraph 10.5.2. Therefore the suggested amended for this to apply to “major” development only is not appropriate.</p> <p>DMD 83 no change - additional wording is not considered necessary.</p> <p>DMD 89 - Focused changes proposed.</p> <p>Appendix 4 - the suggested change is not</p>
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		<p>The following minimum space standards will normally be applied in line with the London Plan and/or the London Housing Design Guide (Interim Edition):</p> <p>Appendix 7 It should be made clear that the London Plan parking standards will be applied flexibly having regard to the location of the site and the nature of the proposed development.</p>	Suggested change	<p>considered necessary.</p> <p>Appendix 7 - the suggested change is not considered necessary as both DMD 45 and its supporting text provides sufficient guidance</p>
30.	Fairview New Homes	<p>Chapter 2 Housing – Generally related to viability DMD 8 – residential standards – part f – lifetime homes standards not always physically or financially viable.</p> <p>Chapter 3 Community Facilities</p> <p>DMD 16 Provision of Community facilities – as a requirement of development in SGAs - this part of the policy is unclear, unreasonable in parts and does not fully accord with Core Strategy Policies 7, 8 and 11. There is no evidence or explanation of why developments should provide such uses, what they should be or whether they would be found acceptable given the tests in Policy DMD 16. In these respects, the policy is unsupported and incapable of proper implementation or interpretation as neither the applicant nor the LPA is informed of what is required, where and why.</p> <p>Chapter 4 Employment support the approach taken by the Local Authority within DMD22. Specifically, Fairview concur with the inclusion of paragraph 4.6.4 and Appendix 13 which outlines the criteria applicants must demonstrate in order to assess the loss of employment land.</p> <p>With this in mind, we suggest that the Local Authority include commentary within</p>	<p>Not stated – but clear soundness issues are raised regarding evidence base for retaining land at Enfield Road within Green Belt.</p> <p>Soundness</p>	<p>DMD 8 - the ability of development to meet the criteria as set out in DMD 8 will be determined on an individual scheme basis and during the planning application stage process</p> <p>DMD 16 - second paragraph amended to provide additional clarity.</p> <p>Chapter 4 - 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</p>

		<p>Delete requirement to “exceed” Code 4 Any requirement for the target from 2011 to 2015 to simply exceed Code Level 4 would, in essence, require applicants to demonstrate Code Level 5.</p> <p>While the inclusion of the words “seek to” is welcomed, we suggest Paragraph 8.1.5 A design stage assessment, conducted by an accredited Assessor and supported by relevant BRE Interim Certificate is overly onerous on developers lead to increased risk of abortive work and consultancy fees if the scheme doesn't achieve consent. Object to the requirement of a post – construction assessment <u>prior to occupation</u>.</p> <p>Paragraph 9.2.3 states “the remediation strategy should consider waste management implications when deciding the best approach to remediation and the handling and treatment of contaminated soils including treatment in-situ and ex-situ”. There are significant cost and time implications associated with the treatment of contaminated soil. Treatment in-situ is subject to both time and space constraints. For example, bio-remediation takes many months and requires significant space to implement the process neither of which are generally desirable when a development itself is subject to a both time and cost constraints. We welcome the flexibility in the approach the Council is taking in relation to Land Contamination.</p> <p>Chapter 12 Green Belt – DMD 83 - Object to inclusion of land at Enfield Road and GB Review Methodology. Question the methodology for the inclusion of certain areas of land surrounding the Borough, notably Land at Enfield Road. This is contained as part of the Merryhills Brook Valley Character Area (1C). Question the inclusion of the aforementioned land in light of the NPPF criteria and the DMD DPD for land properly functioning as Green Belt. Particularly in light of the NPPF paragraph 80.</p> <p>DMD 84 Areas of Special Character The land is segregated from the remaining designated land of Merryhills Brook</p>	<p>change</p> <p>Soundness</p> <p>Soundness</p>	<p>requirement for development “to seek to exceed Code level 4” is intentionally worded to encourage where feasible going beyond Code Level 4 and should be read within the context of additional text added to take account of issues of technical feasibility and economic viability.</p> <p>Flexibility to negotiate the submission of a post construction assessment with the LPA is given within the same sentence.</p> <p>DMD 83 no change - justification for inclusion of sites in designated areas referred to is provided in the evidence base which supports the DMD. 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</p>
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		<p>flexibility or wider consideration of the planning benefits that may result in the loss of the small business units. We suggest that the wording of the policy is amended to: “Proposals involving the loss of units of less than 50 sqm suitable for start-ups and small business will generally be resisted unless other considerations indicate otherwise. Proposals for the loss of small business units should demonstrate either: a) A lack of demand for the unit through the provision of robust marketing evidence; or b) Wider regeneration objectives can be met through their loss.”</p> <p>DMD25 Locations for new Retail, Leisure and Office Development (Unsound) As worded, Policy DMD25 restricts new development to within 300m of the primary shopping area. However, this distance is arbitrary and prevents sites coming forward which can demonstrate through an impact assessment that a location beyond this is appropriate. Should there be a site beyond this 300m distance, which a sequential impact test can demonstrate is appropriate for new development, permission should be granted.</p> <p>DMD 49 Sustainable Design and Construction Statements (Unsound) We suggest that in order for the policy to be found sound, a reference to viability is included in the second paragraph of this policy.</p> <p>DMD75 Waterways (minor clarification needed unsound) This policy requires that when an industrial/commercial development is adjacent to a waterway, an active façade should be created, where possible. Whilst we appreciate that the term “where possible” is included in the policy, we believe that further clarification of this point is required for the policy to be found sound. Currently, it is unclear what the words “where possible” refer to. In this state, the policy would not be consistent with national policy, as it would potentially create a barrier to the optimisation of the site and to other objectives within the Local Plan.</p>	<p>Soundness</p>	<p>regeneration benefits are accepted to outweigh the loss of small business accommodation, these will be justified and evidenced through other relevant local plan policies that will be established through area action plans.</p> <p>The use of the distancing of 300sqm allows for a walking distance of less than 5 minutes from the primary shopping area of a town centre. Providing a distance allows for proposals to remain accessible and connected to the town centre, as set out in paragraph 23 on the NPPF.</p> <p>DMD 49 Focused changes proposed.</p> <p>DMD 75 no change - The overall objectives of the Policy would still apply notwithstanding any exceptional circumstances that maybe specific to individual sites</p>
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		<p>DMD 79 Ecological Enhancements (subject to viability needed unsound) This policy requires development of a certain size to provide on-site ecological enhancements. We do not consider this policy to be sound, as it is not consistent with national policy and is not positively prepared. Paragraph 173 of the NPPF places emphasis on viability and deliverability of schemes, and there is no reference to this within the policy.</p> <p>DMD 83 Development Adjacent to the Green Belt (inflexible policy therefore unsound). This policy places a number of restrictions on development located next to or near to the Green Belt. Whilst we understand the need to protect the visual appearance of the Green Belt, we believe that this policy in its current form is too restrictive and does not give consideration to site specific circumstances. As stated above, Stonehill Business Park is covered by a SIL designation and therefore uses should be appropriate for this, primarily in order to support jobs and growth in the Borough.</p> <p>The policy is inflexible and not sound in its current form, as it restricts development from optimising the site, as required by the NPPF. We suggest that a reference to site specific circumstances should be inserted into the first paragraph of the policy.</p>		<p>DMD 79 – Focused changes proposed.</p> <p>DMD 83 is not considered inflexible. The objectives to protect land adjacent to the Green Belt, regardless of existing land use designations, are still applicable and would not restrict development or optimising the use of land any more than any other site specific circumstances.</p>
32.	Broomfield Home Owners Association	<p>Introduction Note the importance of The National Planning Framework and this comment; “The Council will always work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possibly ...”</p> <p>Also, “Planning applications that accord with policies in The En field Local Plan documents will be approved without delay.</p> <p>And “ Where there are no policies relevant to the application ... the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <ul style="list-style-type: none"> • Any adverse impacts in granting permission would significantly and demonstrably outweigh the benefits ...” <p>“Specific policies in that Framework indicate that the development should be restricted.”</p>	To note	<p>The wording reflects the presumption in favour of sustainable development as adopted in national policy. The DMD has been developed as a positively prepared Plan in order to respond to, and be in conformity with, the National Planning Policy Framework.</p>

APPENDIX 3 - PRESS NOTIFICATION FOR PROPOSED SUBMISSION DMD

Published in Enfield Independent July 2013

Enfield Council
Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Planning) (England) Regulations 2012
Regulations 19 and 20

NOTICE OF PUBLICATION OF THE PROPOSED SUBMISSION DEVELOPMENT MANAGEMENT DOCUMENT (2013)

Enfield Council is to formally publish the Proposed Submission Development Management Document for consultation along with its supporting documents for an 8 week public consultation period starting **Wednesday 10th July to 5.00pm Friday 6th September 2013.**

The Development Management Document, once adopted, will be part of Enfield's Statutory Local Plan. The document provides detailed criteria and standard based policies for assessing planning applications in Enfield. It will apply to all planning applications in the borough from home extensions to large scale applications for residential, commercial and mixed use development.

The Proposed Submission Development Management Document and supporting documentation will be available to view online at <http://www.enfield.gov.uk/dmd> or as hard copies at the Civic Centre (main reception), Silver Street, Enfield, EN1 3XA (Monday – Friday 8.30am-5.00pm) and local libraries during normal opening times.

The Council is inviting representations to be made on whether the Development Management Document is legally compliant and sound before it submits it to the Government for independent examination. All representations made will be submitted along with the Development Management Document and will be considered by the appointed Planning Inspector.

Comments can be emailed to: localplan@enfield.gov.uk

Or sent to:

Strategic Planning & Design

Enfield Council

FREEPOST NW5036

Civic Centre

Silver Street

Enfield

EN1 3BR

Any comments must be received by 5.00pm on **Friday 6th September 2013.**
For further information please contact the Planning Policy Team on 0208 379 3866.



APPENDIX 4: 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
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 –

Date		Event	Location	Time
				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 (Palmer's Green)	2-5
Sat	14 th July	Angel Community Centre – Summer Open Day	Angel Community Centre	11- 2.30
Sun	15 th 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 (Palmer's Green)	2 -5pm
Friday	10th Aug	On Your Doorstep	Broomfield Park (Southgate Green)	2 -5pm
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

