Hadley Wood Neighbourhood Plan

Consultation Statement

October 2022

SD

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1 Introduction

1. The Hadley Wood Neighbourhood Planning Forum ("Forum"), as qualifying body as defined by the Localism Act 2011, has submitted its Neighbourhood Plan to Enfield Council for independent examination. This Consultation Statement meets the requirements of Neighbourhood Planning (General) Regulations 2012 Regulation 15 to provide a detailed description and of Regulation 14 to record the pre-submission consultation. It also contains an outline of earlier consultations carried out while developing the Hadley Wood Neighbourhood Plan ("NP", "Plan").

2. Section 15(2) of the Regulations states that a Consultation Statement is a document which:
    - contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
    - explains how they were consulted;
    - summarises the main issues and concerns raised by the persons/bodies consulted; and
    - describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

3. This Consultation Statement summarises the key statutory and non-statutory consultation undertaken with the local community and other relevant bodies and stakeholders in developing the draft Neighbourhood Plan. In particular it describes how some of the concerns that arose during the statutory pre-submission consultation have been addressed and what changes have been made to convert the draft Neighbourhood Plan into this proposed Neighbourhood Plan.

4. The first meeting on a possible neighbourhood plan was held in 2014 and the Hadley Wood Neighbourhood Planning Forum and Neighbourhood Plan Area were approved by Enfield Council on 7 July 2015. The plan has been actively worked on since then; progress has been slower than hoped due to work commitments of the Forum members and Covid.

5. The various consultation activities on the draft Neighbourhood Plan carried out are summarised in the next Sections.

2 Consultation methodology

1. This section of the Consultation Statement outlines the approach taken by the Forum to consult on the draft Neighbourhood Plan. Several methods were adopted to ensure all relevant bodies and parties were informed of the progress and consultations throughout the development of the draft Neighbourhood Plan and provided with opportunities to outline their views and comments.

2. Appendix A has a detailed list of the many consultation events over the past eight years.

3. The Hadley Wood Neighbourhood Planning Forum (the "Forum") was informally established after 80 residents, councillors and local business representatives attending a public meeting. The Forum's constitution was approved at a meeting in December 2014.

4. During 2015 various public meeting and an online survey provided the outline of what residents wanted to be reflected in the neighbourhood plan.

5. The Forum was designated by Enfield Council in July 2015, and a planning workshop, facilitate by an independent planning consultant, was held in November 2015.

6. The Forum developed outline policies at meetings throughout 2016, but some momentum was lost due to the scale of the required work. In June 2017 the Forum therefore established a smaller neighbourhood plan working group, with an initial focus on applying for grant funding and appointing a professional planning consultancy to facilitate the production of the NP and to prepare detailed planning policies, for review by the Forum and for public consultation.

7. The grant application was approved in August 2017, and after tenders by planning consultants the working group selected Troy Planning. After a successful application for Technical Support professional planning resources were allocated to produce the Hadley Wood Heritage and Character Assessment.

8. In the summer of 2018 a first draft NP was reviewed by Forum members and a group of residents. A second draft was published on the Hadley Wood Association website in January 2019, when it was also shared with Enfield Council.

9. A number of meetings took place between with Enfield Council, who also sent a detailed response to the early draft NP in July 2019, offering constructive advice and support.

10. Updates on the Plan were presented to residents in July 2019 and November 2019.

11. Additional grant funding was received for 2018/19/20 and revised updates were published in December 2019 and in May 2020.

12. The draft Regulation 14 Summary of the Plan was circulated to the working group and a core group of residents in June 2020, with a Regulation 14 consultation scheduled for August to October 2020. However, this was delayed because of Covid.

13. The Forum has from the outset kept residents and other interested parties fully informed, with the focus shifting to online communication since the onset of Covid:

    a. Public meetings, mainly held at the HWA Centre but also online (through Zoom);

b. Websites, initially through a Neighbourhood Planning Forum page on the website of the Hadley Wood Association, and subsequently via a dedicated Hadley Wood Neighbourhood Plan website;

c. The Hadley Wood News, a commercially produced magazine/newsletter that is distributed free of charge to every household in Hadley Wood on a bimonthly basis.

d. Emails and WhatsApp messages to the members/chat groups of the Hadley Wood Association, the Hadley Wood Lawn Tennis Club and Hadley Wood Security/Neighbourhood Watch.

14. In early 2022, with the Reg. 14 public consultation coming up, a dedicated website was set up: www.hadleywoodnp.co.uk. The website provided updates on progress, links to all relevant documents and details on how comments can be submitted.

15. The Forum arranged an 8 week Regulation 14 public consultation on the draft NP from 8 May 2022 to 3 July 2022.

16. Copies of the eight page Summary of the Plan and feedback/survey form were delivered to all households in the Plan Area on 7-8 May, with soft copies made available on the dedicated NP website. Emails were sent to all Statutory Consultees, a list of which was provided by Enfield Council, with the Forum adding further names and entities.

17. Banners and posters were displayed throughout the Plan Area, highlighting the consultation period, public meeting and website.

18. A very well attended public meeting took place at the Hadley Wood Association Centre on 21 June 2022.

19. By the end of the consultation period 196 feedback forms were received, in addition to extensive comments from Enfield Council and Thames Water.

3 Regulation 14 pre-submission consultation

1. Regulation 14 consultation with residents and statutory bodies on the final draft Neighbourhood Plan took place from 8th May 2022 to 3rd July 2022.

2. The consultation involved a survey asking consultees whether they supported each individual policy with space for free form comments. Feedback forms were available online and hard copies were delivered to all households. Alternatively, email comments could be provided.

3. The survey was advertised in advance by the use of the local magazine (HWA News), HWA and Neighbourhood Plan websites, emails, social media, banners and posters on noticeboards.

4. Paper copies of the survey and the draft Neighbourhood Plan were made available at the HWA Centre, the local Londis shop and at Hadley Wood Golf Club. Completed paper forms could be handed in at the Londis shop.

5. All the documents could be downloaded from the Hadley Wood Neighbourhood Plan website. Feedback forms could also be completed online, using either Google Forms or a Word document.

6. The Neighbourhood Planning Forum also arranged a public meeting on 21 June 2022, well before the 3 July 2022 consultation deadline, where residents and other interested parties could hear more about the draft NP and ask questions or raise issues.

7. Statutory Consultees were contacted by email with access to the draft Neighbourhood Plan, the feedback forms and instructions on where to send replies.

8. Below is a complete list of consulted bodies (mostly provided by Enfield Council):
    - **Enfield Council** – Planning Support, Planning Admin, Forward Planning, Joyce Zhu, May Hope, Natalya Palit, Vincent Lacovara.
    - **Barnet Council** – Forward Planning, Emma Watson.
    - **Hertsmere Council** – Planning, Mark Silverman.
    - **Hertfordshire County Council** – Spatial Planning, Growth, Andrea Gilmour, Martin Wells.
    - **Members of Parliament** – Bambos Charalambous, Theresa Villiers, Oliver Dowden.
    - **Enfield Councillors** (Cockfosters Ward) – Alessandro Georgiou, Edward Smith, Ruby Sampson.
    - **Barnet Councillors** (various wards) – R. Barnes, M. Haylett, D. Longstaff, P. Cohen, E. David, S. Radford, P. Edwards, E. Whysall.
    - **Hertsmere Councillors** (various wards) – Christian Gray, Chris Myers, Paul Hodgson-Jones, Abdishek Sachdev, Mike Reeve, Sarah Hodgson-Jones, Jean Heywood, Ruth Lyon.
    - **Artemi & Gibbs** – Info.
    - **Barnet Society** – Membership.
    - **BT** – CCEO.
    - **Coal Authority** – Planning Consultation.
    - **Cockfosters Local Area Residents Association** – Clara.
    - **CPRE London** – Office.
    - **Duchy of Lancaster** – Mr Bruce Watt.

- **Enfield Disability Action** – EDA.
- **EE** – Chris Belbin.
- **Enfield Racial Equality Council** – Info.
- **Enfield Society** – Info.
- **Enfield Voluntary Action** – Admin.
- **Environment Agency** – North London Planning, HNL Sustainable Places.
- **Friends of Trent Country Park** – Info.
- **Fusion Property** – Info.
- **Hadley Wood Association** – Robert Wilson.
- **Hadley Wood Golf Club** – Info.
- **Hadley Wood Jewish Community** – Mike Singer.
- **Hadley Wood Primary School** – Office.
- **Hadley Wood Rail Users Group** – Francesca Cain.
- **Hadley Wood Security** – Simon Lester & Stuart Singer.
- **Health Watch Enfield** – Chief Executive.
- **Heronslea Group** – Info.
- **Highways England** – M25 Planning, Planning.
- **Historic England** – London Planning Policy, Nina Dierks.
- **Homes & Communities Department** – Mala Pandya, Janet Trench.
- **Homes England** – Enquiries.
- **London Forum** – London Forum.
- **Marine Management** – Consultations, Lucinda Robinson.
- **Metropolitan Police** – Cockfosters.
- **Monken Hadley Common** – Clerk.
- **National Grid** – Vicky Sterling.
- **Natural England** – Consultation.
- **Network Rail** – Stephen Austin, Steven Mills, Rob Fairhead, Julie Houghton.
- **NHS** – NCLCCG Complaints.
- **Octagon Homes** – Laurence Holder.
- **Optic Realm** – Info.
- **Savills** – Thames Water Planning Policy.
- **Scott Sampson** – Info.
- **Shanly Group** – Michael Shanly).
- **St Paul's Church** – Admin.
- **Troy Homes** – Karen Roake.
- **Yogo Group** – Info.

4 Consultation feedback and key changes made

The response to the public consultation was excellent, with almost 200 replies received from residents. Their input, and the extensive comments received from Enfield Council, the Duchy of Lancaster and Thames Water were reviewed and the draft Plan was updated as the Forum deemed appropriate. Below is a summary of the feedback and key changes made to the Plan, with detailed reviews in Appendix B and C.

Enfield Council

a. Enfield Council sent extensive feedback in a letter dated 14 July 2022 (attached in Appendix D). Although received after the end of the Regulation 14 consultation period the input was accepted.

b. Issues, questions and comments raised in the letter were summarised and reviewed. Most of the 49 points raised were accepted and appropriate changes made (Appendix C).

c. Key changes included, inter alia:
   - Greater detail on the character and setting of Hadley Wood.
   - Explanation added why some NP policies reinforce existing Enfield policies.
   - Guidance wording removed from policies and included in the main body of the Plan.
   - Justification added for higher local parking standards, consistent with the exception guidance in the London Plan 2021.
   - Construction management policy amended.
   - Justification of 2 for 1 tree replacement policy enhanced, along with net gains to biodiversity, as required by the Environment Act 2021.
   - Clarification that the Green Belt Aspiration is only in respect of the Green Belt within and in the immediate vicinity of the Neighbourhood Plan area.
   - Detailed justifications for each proposed Local Green Space designation.
   - References updated and corrections made.

d. Enfield Council noted in a video call on 17 October 2022 that their 14 July 2022 letter had in fact not captured all their observations and a letter with further input was awaiting sign-off. The Forum representatives noted that the intention to submit the NP in October had been communicated to the Council since 14 July 2022, and the final drafts had been circulated to the Forum members, with a meeting scheduled for 25 October to discuss and vote on the submission documents.

e. The latest drafts were forwarded to Enfield Council, who provided comments on 21 October. The issues were also discussed during a video call that day.

Survey feedback

a. During the Regulation 14 consultation period that ran from 8 May 2022 to 3 July 2022 a very impressive 196 replies were received:
   - The vast majority (181 = 93%) came from residents of Hadley Wood. The remainder (15 = 7%) was from businesses operating in Hadley Wood, councillors, family members, etc.
   - Reflecting the demographics of the area, 45% of the respondents were over the age of 65 and 43% aged 46 to 65; only 13% were under 25.
   - 55% of respondents were female.

b. A detailed review of the feedback is attached in Appendix B. **All proposed policies were supported, with most receiving the backing of more than 80% of respondents**. A number of draft policies were amended:-

Policy	Strongly Agree/ Agree	Strongly Disagree/ Disagree	Assessment / Plan updated
Setting, character & views	95%	4%	No common theme in comments. NP updated to provide more detailed description of the character of Hadley Wood, and to explain why some NP policies reinforce Enfield policies.
Trees, natural environment & biodiversity	94%	2%	Most comments reflected the desire to protect the trees that define so much of Hadley Wood's character. NP updated to expand comments on 2 for 1 tree replacement policy and biodiversity net gains.
Boundary walls, railings & gates	84%	9%	Various respondents mentioned the desire for added security. NP updated to exclusively refer to front boundary treatments, comment on security aspect and flag Enfield's 1m max height policy.
Paving of front gardens & off-street parking	89%	7%	Comments varied from wanting existing fully paved front gardens changed to the desire/need for adequate off-street parking. NP updated to outline Enfield's and London Plan policies on hardstandings and front gardens, and encouragement to keep more than the minimum required area vegetated. PD right removed in certain circumstances to ensure the policy applies to works. Policy splits into two, with a narrow parking standards exception consistent with the London Plan guidance.
Small sites, including back gardens	96%	3%	Comments were supportive. Some comments on transparency of planning decisions and enforcement. Policy split into separate Small Sites and Back Garden policies. Comments added on issues that the LPA must consider when adjudicating planning applications. Certain PD rights to be removed in specific situations.
Flood risk	98%	0%	No noteworthy comments. No changes made to NP.
Sustainable drainage	97%	0%	No noteworthy comments. No changes made to NP.
Local Green Space designations	98%	0%	No noteworthy comments. More comprehensive and robust justifications added.
New housing development & mix	73%	15%	Comments reflected strong resentment at the number of single family dwellings being replaced with apartment blocks. Also, it was not understood that the draft policy reflects existing Enfield/London housing

			policies. New policy HW-11 added, which limits the number of dwellings being replaced with apartment blocks (reflects and builds on Enfield DMD policy 5).
High quality built environment	95%	4%	A number of respondents felt that too many apartments are being built. See previous point. It was also noted that quality is a subjective assessment. NP updated to better define Hadley Wood's character.
Heritage assets	96%	0%	HW Conservation Area Group should be enhanced. NP updated to note that the Forum would gladly assist in a review of the workings of the CA group.
Construction activity	99%	0%	Many comments highlighted the nuisance caused by builders' parked vehicles. NP policy updated to specifically refer to parking near building sites.
Social & community facilities	97%	1%	No noteworthy comments. No changes made to NP.
Crescent West Local Parade	97%	1%	Comments reflected the desire to have local shops such as a bakery, post office and dry cleaner, as well as a restaurant. NP updated to strongly encourage the Council to do everything within its power to help ensure the long-term viability of the Local Shopping Parade.
Active travel	92%	1%	Comments were wide-ranging, but themes were the desire to have better local bus services and footpaths being inaccessible due to overhanging vegetation. NP updated to expand comments on bus services and footpaths.
CIL allocations	96%	3%	Comments highlighted a desire for transparency and how funding priorities will be set. NP updated to comment on transparency and the process for setting the funding priorities.

Other Statutory Consultees

a. Aside from Enfield Council only two entities provided noteworthy comments:

- **Duchy of Lancaster** – letter written by CBRE on behalf of the Duchy is attached in Appendix E. The comments reflect its desire to release 11ha of grassland it owns in Hadley Wood from the Green Belt for development (as outlined in Enfield's Reg.18 draft Local Plan 2019-2039). Key comments include, inter alia:
    - The NP should not contradict the spatial priorities set out at a local level by giving stronger protection to the Green Belt.
    - Objective 1, stating that the NP does not propose any amendments to the Green Belt, should be removed.
    - The policy on the Character, Setting and Views should be amended so that development "is sensitive to" those, rather than "maintaining" those.
    - The policy on Local Green Space designations should exclude the above-mentioned site.
    - Whilst the Duchy broadly supports the vision and objectives of the draft NP, it has concerns regarding some of the policies with regard to compliance with the NPPF, London and Local Plans, specifically as it relates to the site it owns in Hadley Wood.

The Forum discussed the letter sent on behalf of the Duchy, and noted:

- The NP complies with the NPPF and aligns with the Enfield/London strategic policies; the NP has been updated to more clearly state this.
- Whilst it is acknowledged that Enfield needs additional housing, the Forum and its advisors believe that there is no need to release Green Belt land in and around Hadley Wood for development.
- In response to Enfield's Reg.18 draft Local Plan 2019-3029 the Forum submitted detailed comments, including extensive reasoning why the site referred to in CBRE's letter should not be released from the Green Belt for development.
- London's Mayor also objected to the release of Green Belt land as proposed in Enfield's draft Local Plan.
- The approved/made neighbourhood plan for Wootton and St Helen Without provides a useful precedent with very similar opposition to release of land from the Green Belt (see for example p18 & 35 - https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2022/05/WSHSNP-Made-Version-single-pages-Nov19.pdf).
- The Forum believes the NP to comply with all requirements and the Duchy's proposed amendments have not been incorporated.

- **Thames Water** – provided detailed and helpful comments. Their letter is attached in Appendix F. Key suggestions included:
  - NPPF para 20 requires strategic policies to make sufficient provision for infrastructure for waste management, water supply, and wastewater.
  - NPPF para 11 states that plans and decisions should align growth and infrastructure.
  - A separate policy covering water and wastewater/sewerage infrastructure should be added (the letter contained suggested wording).
  - Wording was also suggested for a paragraph that developers must make proper provision for surface water drainage.

  The Forum discussed the feedback and updated the Plan as follows:
  - The wording of Thames Water's suggested policy was quoted in the body of Section 5 (Natural environment) but was not included as a separate policy, as policy HW-10 already states that planning officers must consider infrastructure capacity when approving applications for new developments.
  - The paragraph on surface water drainage was also added to Section 5.

b. Other replies, which did not contain noteworthy comments and that did not result in changes to the NP, were received from:
   - Coal Authority.
   - Environment Agency.
   - Hadley Wood Jewish Community.
   - Historic England.
   - Marine Management.
   - Natural England.

Appendix A – Consultation events

Below is a list of the key consultation events. Many additional informal discussions and communications took place with residents, Councillors and Enfield Council officers.

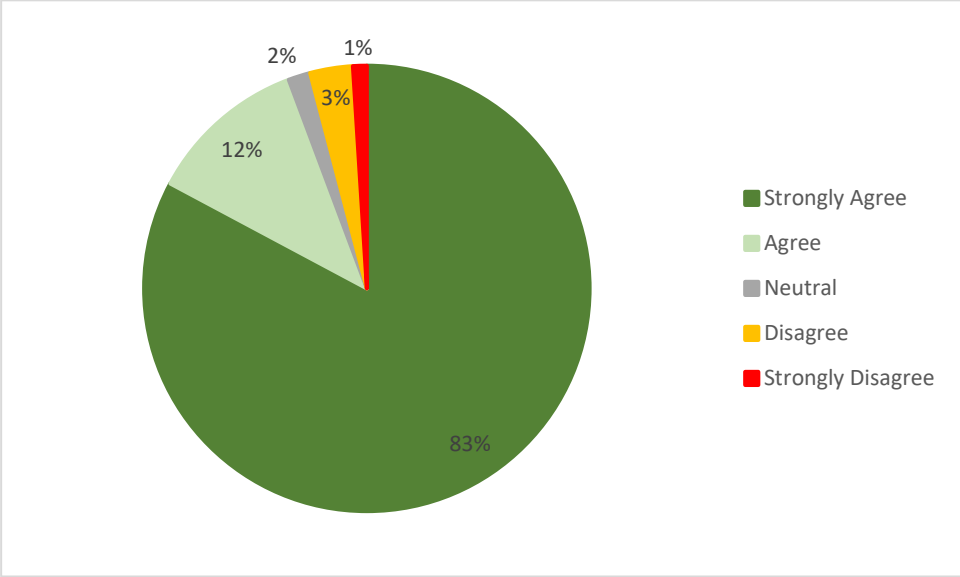
Date	Event	Comments
Mar 2014	HW News article	Introduction of neighbourhood plans, informing residents on what those entail and inviting people to participate.
May 2014	HW News article	Follow up article, providing further details and again inviting residents to participate.
18 Jun 2014	Public meeting	80 residents, councillors and local businesses met to discuss the concept of a neighbourhood plan.
Jul 2014	HW News article	Details of public meeting that was held and update on process.
Nov 2014	HW News article	Update on progress and inviting residents to join the Forum.
Jan 2015	HW News article	Update on progress and notifying residents that the Forum would be applying to Enfield Council to be formally designated.
Mar 2015	HW News article	Update on designation of Forum and inviting residents to join public meetings to discuss proposed workstreams.
25 Mar 2015	Public meeting	Meeting to discuss proposed workstreams.
29 Apr 2015	Public meeting	Meeting to discuss proposed workstreams.
Spring 2015	HWA website Planning Forum page set up	Updates on the NP added to a new NP Forum page on the website of the Hadley Wood Association.
May 2015	HW News article	Update on progress, details of how people could join the Forum, where additional info was made available and how feedback could be provided (incl. to Council).
May 2015	Online survey of residents	Over 100 responses were received on the proposed policy topics.
27 May 2015	Public consultation	End of consultation period to establish the Neighbourhood Planning Forum.
24 Jun 2015	Public meeting	Presentation on results of online survey.
7 Jul 2015	Forum & Area designation	Formal approval of the Hadley Wood Neighbourhood Planning Forum and the Neighbourhood Plan area by Enfield Council.
Sep 2015	HW News article	Confirmation of formal designation of the Forum and invitation to Workshop to discuss what should go in the Plan.
26 Nov 2015	Workshop	Around 50 residents attended a workshop that was facilitated by an independent planning consultant to discuss potential policies and vision.
Jan 2016	HW News article	Details of where information on the workshop and online survey outcomes were available and inviting people to let the Forum know what they wanted in the Plan.
19 Jan 2016	Public meeting	Presentation on results of workshop.
14 Feb 2016	Email	Details of the discussions at the workshop were emailed to Neighbourhood Planning Forum members.
May 2016	HW News article	Update on progress and issues that were raised.
27 Jun 2017	Public meeting	Update on progress.
Sep 2017	HW News article	Update on progress, including tenders of planning consultants and funding.

25 Oct 2017	Public meeting	Update on progress and report on the June public meeting.
Oct 2017	Publication of draft Vision and Objectives	The Forum published draft Vision and Objectives for the NP on the HWA website and circulated via email.
Jan 2018	HW News article	Update on progress, such as appointment of Troy Planning and Aecom (for Heritage and Character Assessment).
Jun 2018	HW News article	Update on progress, including Heritage & Character Assessment and funding, the draft London Plan and Enfield Local Plan, meetings with Enfield Council, the updated NPPF, etc.
Aug 2018	HW News article	Confirmation that new funding was obtained and that the planning consultants had completed a first draft of the NP.
Aug 2018	Review of first draft NP	The Hadley Wood Neighbourhood Planning Forum and a group of residents reviewed the first draft of the NP.
Nov 2018	HW News article	Update on progress.
Dec 2018	Draft NP sent for review to Enfield Council	Enfield Council responded on 5 July 2019.
Jan 2019	Second draft NP published on HWA website	Residents were invited to review and comment on the draft NP via an email from the Hadley Wood Association and article in the HW News.
Jan 2019	HW News article	Update on progress and inviting residents to review the draft NP and send in their comments.
Feb/Mar/Jun 2019	Meetings with Enfield Council	Meetings to discuss draft NP.
May 2019	HW News article	Summary of key aspirations and inviting residents to public meeting to discuss the draft NP.
10 Jul 2019	Public meeting	60 residents attended a public meeting to discuss the draft NP.
Jul 2019	HW News article	Details of discussions at 10 July public meeting.
Nov 2019	Hadley Wood Association AGM	Update on NP presented to residents, followed by questions and answers.
May 2020	HW News article	Update to alert residents to delays caused by Covid, but that work was nevertheless progressing.
Jun 2020	Draft Reg.14 consultation summary reviewed	The Planning Forum and a core group of residents reviewed the draft summary document.
Jan 2021	Forum redesignation	Formal redesignation of the Forum by Enfield Council for a further 5 years.
Feb 2021	HW News article	Update on redesignation of the Forum, guidance on front gardens, boundary treatments and hardstandings, and call for additional volunteers.
Dec 2021	HW News article	Update to explain delays due to Covid, but that work was progressing, with public feedback used to update the draft Plan, with a target date for the Reg.14 public consultation to be agreed at the Forum's AGM.
Jan 2022	AGM	Forum AGM.
Mar 2022	Neighbourhood Plan website set up	Dedicated NP website set up; information also remained available on the HWA website.
May 2022	Reg. 14 public consultation	8 week public consultation on the draft NP.
Apr-Jun 2022	Emails, WhatsApp, banners and posters	Details of Reg. 14 consultation, where details could be obtained, how feedback could be submitted, and details of public meeting to be held.

Jun 2022	HW News article	Details of Reg. 14 consultation, where details could be obtained, how feedback could be submitted, and details of public meeting to be held.
21 Jun 2022	Public meeting	Over 50 residents and councillors discussed the draft NP.
Aug 2022	HW News article	Update on Reg. 14 consultation and expected timeline.
17 Oct 2022	Meeting of Forum representatives and Enfield Council	Enfield Council indicated at the meeting that it had additional observations on the draft NP.
21 Oct 2022	Meeting of Forum representatives and Enfield Council	Follow up to meeting of 17 Oct.
25 Oct 2022	Forum meeting	Meeting to discuss final documents and sign off on submission to Enfield Council.
26 Oct 2022	Meeting of Forum representatives and Enfield Council	Follow up to meetings of 17 and 21 Oct.

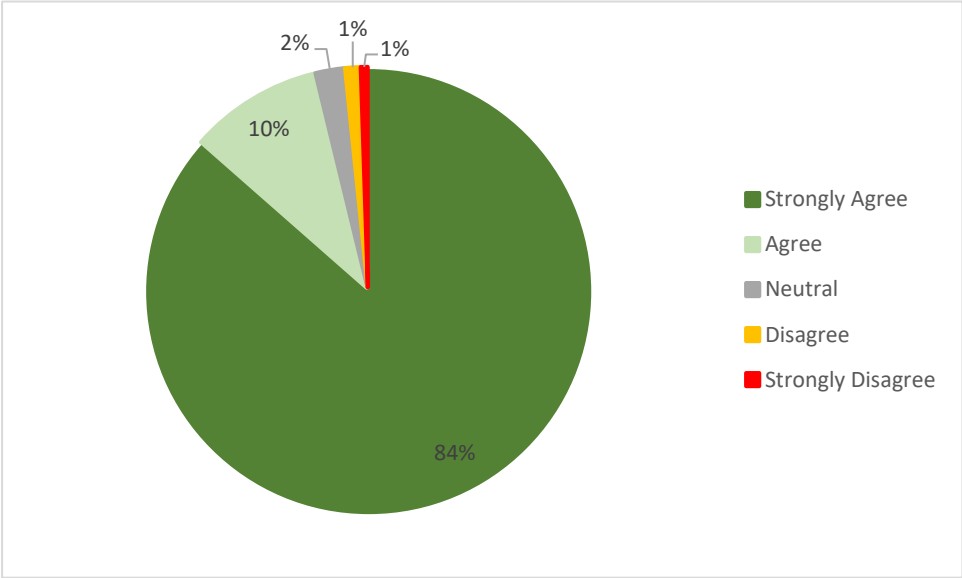
Appendix B – Reg. 14 Consultation questionnaire feedback review

The table below reviews the feedback in the 196 completed forms. Note that Policy references relate to those contained in the consultation document; numbering etc was updated in the final version.

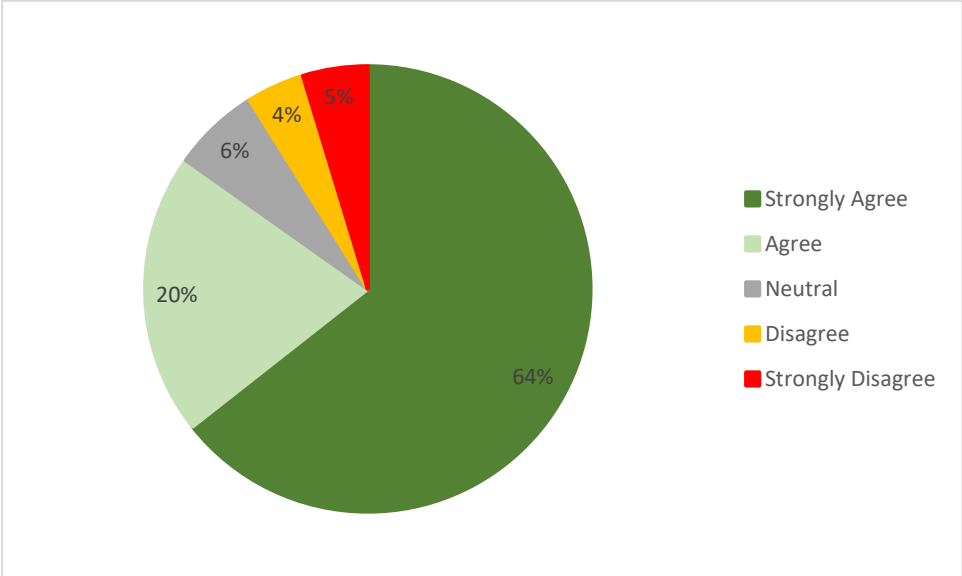
Policy	Feedback	Assessment
HW-C1 *(p25)*	**Character, setting and views** *Space and views between properties will be retained*  Homes are being demolished and replaced with new ones that are two, three or even four times larger than the original structure. 1m+ distance from boundary must be respected in all works at or near the main dwellinghouse, be they single or multi-storey, outbuildings, etc. Can we stop this building to the very edges please, completely unnecessary and "show-y" for no reason.	95% of the respondents "strongly agreed" or "agreed" with the proposed policy. There was no common theme in the comments. One respondent provided detailed thoughts and suggestions, mostly relating to the proposed release from the Green Belt of the fields between Camlet Way and Crescent West. Those points are more relevant to Enfield's draft Local Plan than this Neighbourhood Plan, and as such only the suggestion to add a more granular character description will be reflected in the updated NP. **NP changes**: ○ more granular/detailed character description of Hadley Wood; ○ explained why the NP policies sometimes overlap with Enfield's, London Plan or national policies (reinforcement of considerations that are important to the NP area).

	Very commendable but not always practical. If house 1 has an extension then house 2 may be stopped from doing a similar thing as the space and views would then be gone. When we built our house in 1988 we had to have a 3m gap each side of the house which we were very happy with – times change! Development must not be overbearing in size or proximity to existing properties. Consider citing the adverse impact of developers demolishing bungalows and replacing them with large dwellings, e.g. Parkgate Crescent, where the demolition of 2 bungalows has left a solitary bungalow (the last of 3) sandwiched incongruously between 2 large houses. Reducing bungalow stock also reduces options for downsizers to stay in the area. Restrict the loss of gardens to increase the size of properties. More in front, all gaps used up. +++++ The draft Neighbourhood Plan (NP) evidence base relies on Landscape Character study conducted at County/ sub-regional scale. Is there a need to consider the neighbourhood character in a closer grained study, at local neigbourhood/ site scale? Paragraph '4.2.6, Views', Hadley Wood Heritage and Character Assessment, AECOM 2018, page 34. The grounds for this comment are: Local Site Character has been studied (with a more detailed addenda latterly, covering Light Pollution and Dark Skies and Landscape Tranquility), as part of Interested	

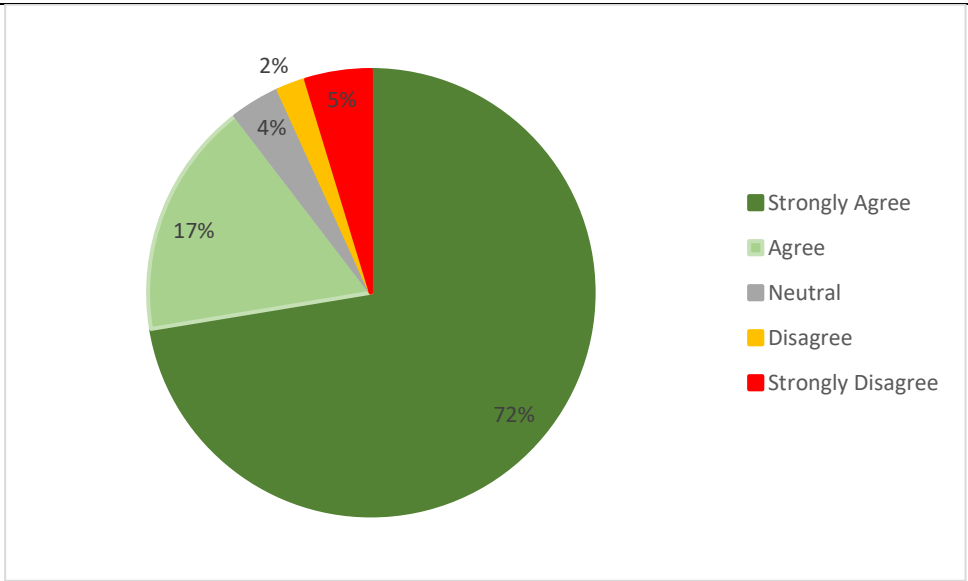
	Persons response to the recent LB Enfield, Regulation 18 draft Local Plan Consultation, in September 2022 See attached: 'Site SA45' Local Site Landscape Study and draft Figures 8 and 9. Question: Should the Conservation Key View at Crescent West be shown on the plan, illustrating Hadley Wood Conservation Area (HWCA) (Appendix 2: Hadley Wood Conservation Area, draft NP)? Does the HWCA Key View at Bartram's Lane recorded in the Hadley Wood Conservation Area Townscape Analysis, 2016 need to be stressed in the draft Neighbourhood Plan evidence base, where HWCA 'Views' are mentioned and the view near Bartram's Lane is illustrated its importance as a 'Key View' is not emphasised, as in the Townscape Analysis above. See attached Figures 8 and in 'Site SA45' Local Site Landscape Character Study. References: 'Key View', excerpted from 'Figure 4, Hadley Wood Conservation Area Townscape Analysis', London Borough of Enfield, Hadley Wood Conservation Area Character Appraisal, Approved Feb. 2015; Amended Sept. 2016 Available from: https://new.enfield.gov.uk/services/planning/heritage-conservationcountrysideinformation-hadley-wood-caa-sept-2016.pdf Note: The current LB Enfield Local Plan treats Conservation Areas under the following policies: • LBE Core Strategy, Adopted November 2010; Core Policy 31- Built and Landscape Heritage; • LBE Development Management Documents, Adopted November 2014, DMD44-Conserving and Enhancing Heritage Assets;	

HW-C2 (p29)	**Trees, the natural environment and biodiversity** *Developers will preserve trees and landscaping*  Trees are being cut down without any thought as to the effect on the environment or the characteristic of the street. There is no evidence of new trees being planted. Basically every aspect of maintain and improve all areas of Hadley Wood are in everyone's interest. Every subject mentioned is vital to retain the outstanding and uniqueness of Hadley Wood. The green spaces are also very important to most residents and I would like to see them preserved. I would also like home owners to ensure that their gardens are maintained to prevent pavement narrowing and ensure safety for pedestrians. This is why we live in Hadley Wood. Please do not destroy it. Hadley Wood is an area of both natural and residential quality which should be protected, properly maintained and even enhanced if feasible. The plan put forward by	94% of the respondents "strongly agreed" or "agreed" with the proposed policy. Most of the comments reflected a desire to protect trees, which are deemed important to what defines Hadley Wood. One resident noted that trees can also cause problems and questioned whether the 2 for 1 replacement policy is realistic for larger developments. **NP change**: ○ expanded comments on the 2 for 1 tree replacement policy. ○ Also added biodiversity net gains, per the Environment Act 2021.

	the residents association is constructive, achievable and beneficial to all. This would ensure the continuation of Hadley Wood as an area of value to be enjoyed by not only it's residents, but also residents of neighbouring areas. Preservation of tree cover, including in private gardens, is a very important factor for me. More specific TPOs needed, including behind Crescent East, with stronger sanctions. TPOs for specific areas, including setting of Conservation Area (e.g. behind Crescent East) put in our definition and evidence of which trees are important (which includes "C" trees, pines, etc). All developers to pay towards planting trees / green spaces – not allowed to pay a levy. Ridiculous to insist on replacing 2 trees for every one cut down on a big development. I know this is a major concern of one of the committee, but it's not practical. As wonderful as trees are they also cause their own problems. Of course we must have trees but you have to be sensible about it. This plan is to reflect the wishes of the whole of Hadley Wood not just a few. It would be nice if properties with foliage on a boundary or public footpath would be maintained. Especially on a public footpath as some properties with foliage obstructing the pathways makes walking dangerous. Residents should make sure that their hedges, plants and trees do not take over the very restricted pavements which do become dangerous for walkers---children especially with small bikes, and mothers with baby-push-chairs. Some residents in the area are letting hedges or trees on their property get overgrown, causing a significant risk to pedestrians and road users. In some areas pavements and	

	some road signs are obstructed and we find ourselves forced into the road to get around the problem. By law, all residents and land-owners are responsible for making sure trees and hedges don't obstruct pavements and should be reminded with this for the safety of road users. 2 large oak trees have been cut down in Waggon Road. One on Council verge outside no 18, one between 26 & 28. Did the developers cut them down or was it the Council?	
HW-C3 (p32)	**Boundary walls, railings and gates** *Low walls will allow views of gardens*  Security is an issue in Hadley Wood. It is wrong to put landscaping ahead of safety. By carefully landscaping in front of fences/railings an acceptable solution can be achieved. Low level fences achieve neither objective. No fences prejudice those who want to add security provisions, especially when so many properties already have fences/gates.	84% of the respondents "strongly agreed" or "agreed" with the proposed policy (with a somewhat lower proportion of "strongly" than the above two policies). Various respondents commented on the security aspect. **NP changes**: ○ added that the 1m max height of front boundary walls, gates and railings ties in with Enfield's policies; ○ expanded comments on security aspect.

	Not sure I agree with low walls but that is the fear of access by criminals. I understand the thinking behind this proposal. However, crime & burglary are a major problem in Hadley Wood & I only feel safe living behind tall gates. They are especially necessary to protect the elderly who are slow to understand the danger of opening a front door to unknown visitors. So while I accept that low walls are more attractive, we also need to feel safe living in Hadley Wood. Lovely, why wouldn't we all want this? Because we don't live in an ideal safe world any more. Totally agree that seeing houses from the street is important and 6 foot walls are to be discouraged but people should be allowed to feel safe. The homeowner should be allowed to put in gates /walls /fence to protect for security and not be dictated to. This is to protect the owner from unwanted intruders but also to protect children/dogs escaping onto roads. I did not 'strongly agree' but only 'agree' that boundary walls. my reason relates to "Low walls to retain open character and allow views of gardens.". I live next to the access road leading from Crescent West /HW railway station to the rail yard and footpath to Waggon Rd. There are properties like mine where a high wall or fence is essential to protect my privacy along the entire side length of my property from being constantly overlooked and vulnerable to people using the access road. This needs to be reflected in the statement about low walls. I agree with the principle of low walls as it applies where a property fronts on to a road. Where there are properties that have a side wall alongside a public path /access road, then personal privacy needs to be respected. Some owners are circumventing the 1 m height limit by setting their gates / railings slightly back from their boundaries but which can still adversely impact views. How can this be addressed?	
HW-C4 *(p39)*	**Paving of front gardens and off-street parking** *Use permeable materials and retain 25%+ as garden area*	89% of the respondents "strongly agreed" or "agreed" with the proposed policy.



Perhaps difficult to enforce 25% greenery and possibly not required as long as using the right approach to drainage etc.

Where paving (impermeable) has been laid it should now be removed to meet the 25% rule.

50% of garden to be retained, not 25%.

I strongly feel that 25% is too low and should be increased to a maximum of 50% of front gardens to be paved, in line with other councils in the area. Front gardens are such an essential element of the character of Hadley Wood that they should be preserved as a priority.

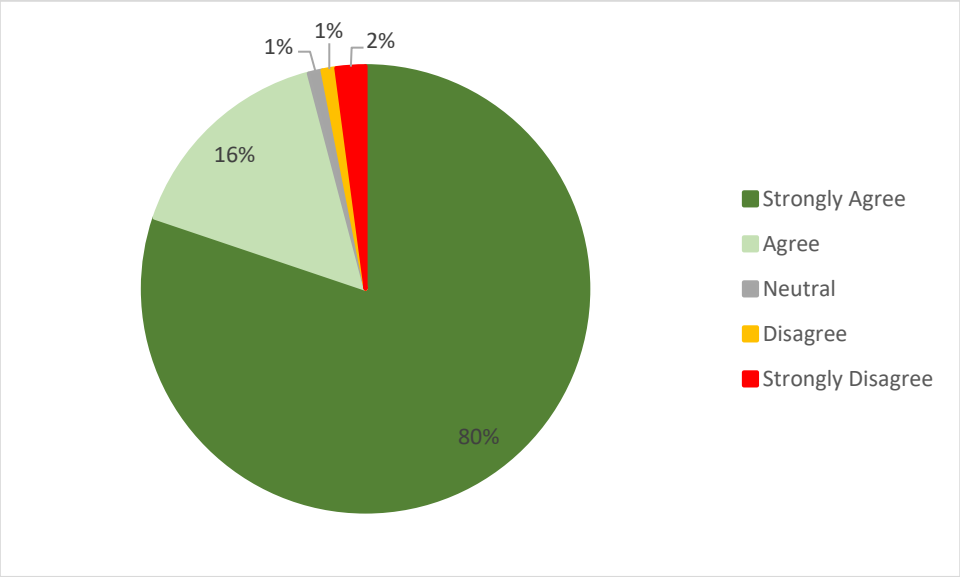
Parking is now a major problem in Hadley Wood, partly due to the needs of the station and the shopping facilities. This is difficult to balance with catering facilities and quick stop shopping.

Comments ranged from wanting existing fully paved gardens having to be changed to hardstandings being needed for off-road parking.

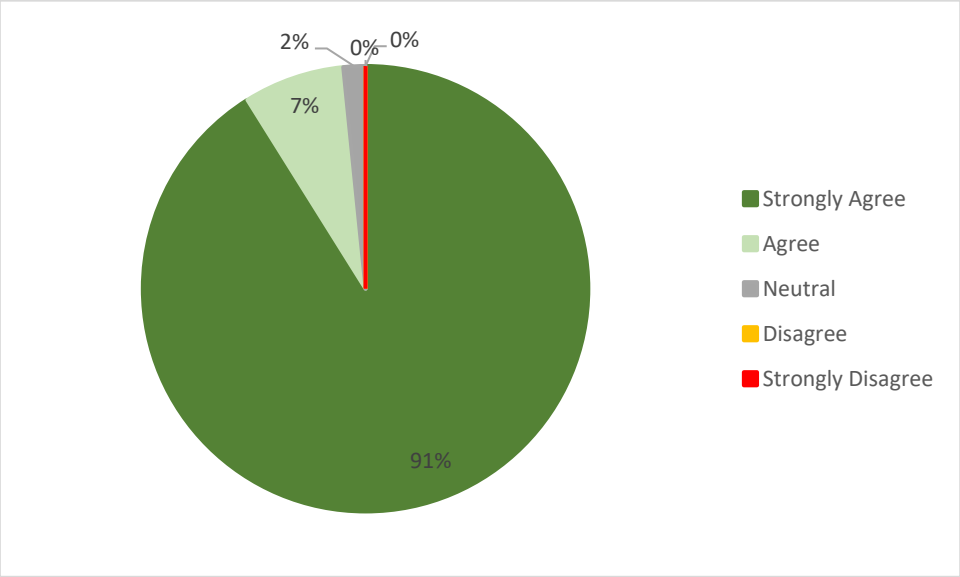
NP change:

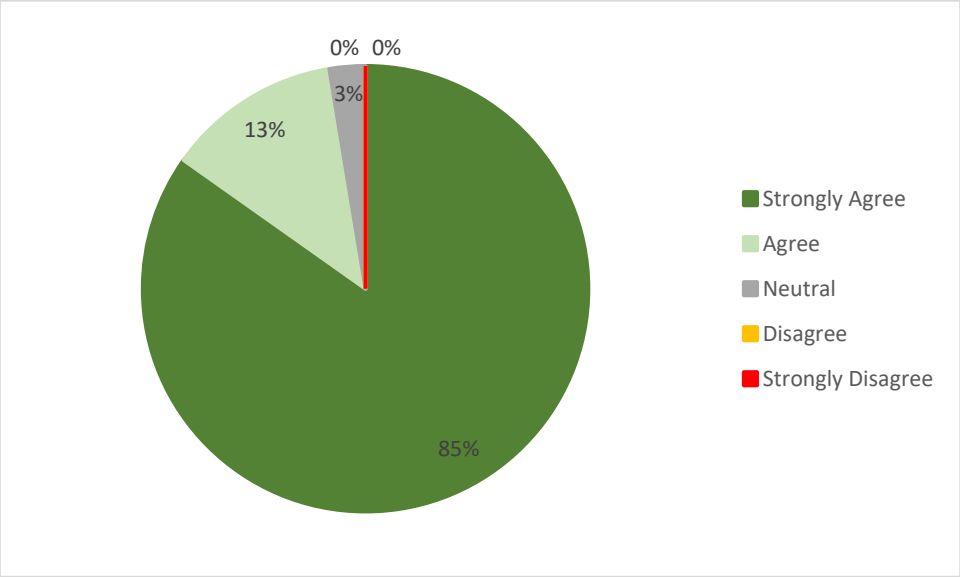
- Expanded comments to explain how the NP policies tie in with Enfield's policies on hardstandings and front gardens.
- Policy split into two, with a more detailed off-street parking standards policy consistent with the exception guidance in the London Plan 2021.

	Planning approvals must have regard for this - ref. the recent approval for 9 flats & 6 parking spaces in Lancaster Avenue. We now have 3/4+ car families & this should be taken into account in planning approvals. At the recent meeting to consider the Neighbourhood plan there seemed to be some suggestion that, given recent developments in the area, the restriction on boundary wall heights and the requirement to retain at least 25% of front gardens as green space should be relaxed. I strongly disagree and feel that the restrictions proposed in the draft neighbourhood plan should be enforced. I am very strongly in favour of any aspect that maintains drainage and minimises flood risk. These are clearly significant issues in Hadley Wood. Some planning consents in HW are known to have included conditions that front hedges and greenery removed during development should be re-instated , however, Enfield Council has not enforced these even where non-compliance has been pointed out to planning officers. At least 2 examples exist in Parkgate Crescent. In relation to the photos shown in fig 12 - the material shown in the photos is often 'permeable' - so would suggest including photos of other material here - as they appear to be 'resin bound' drives, which are often permeable. Driveways need to provide adequate off-street parking to make sure our roads are as clear as possible. This can be achieved without making the whole of the front paved but to return to “front gardens from 50/60 years ago is unrealistic. Common sense landscaping with sufficient parking is the compromise. Again, you are trying to create an impractical “one size fits all” scenario. Frontages should be allowed to have room for as many cars as they want, as long as the drives are permeable and there is some greenery. I would rather have cars off the road than have	

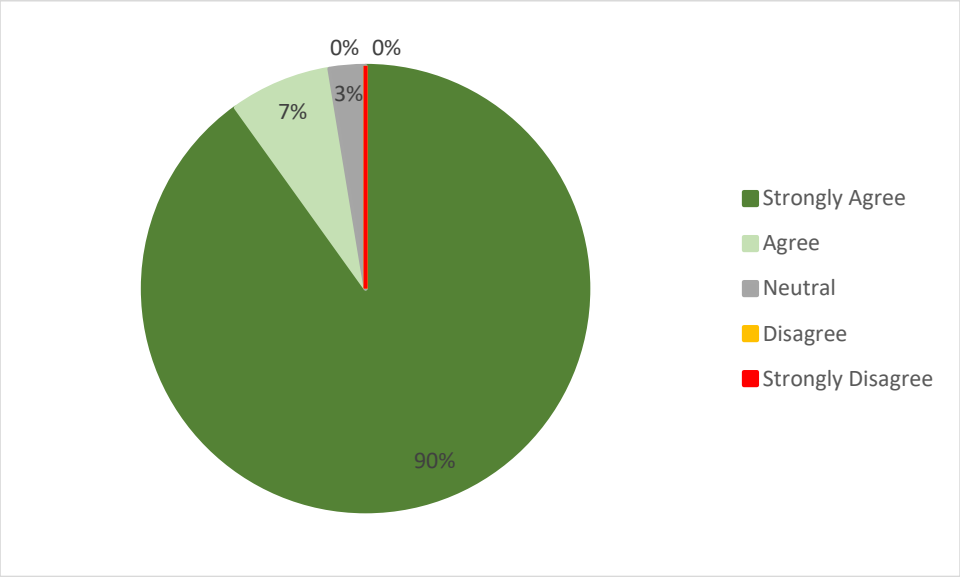
	all our streets littered with cars on both sides of the road. This in itself is a hazard for residents coming out of their drives.	
HW-C5 (p40)	**Small sites, including back gardens** *Development must not harm character and biodiversity*  Back garden infilling with flats and houses is spoiling the area. The replacement of single houses with 5 to 7 houses on the same plot is now overdone. The policy should be enhanced to specifically state that the fragmentation of rear gardens to enable new residential developments in the Conservation Area will not be permitted. The Lancaster Avenue residents successfully fought off an attempt by two residents to sell off the rear garden of their houses to create 4-6 new homes. Both applications went to the Planning Inspectorate and were rejected on the basis of the harm to the nature and setting of the Conservation Area. An extract from the Appeal Decision is below:	96% of the respondents "strongly agreed" or "agreed" with the proposed policy. Comments were supportive. **NP change**: none required, but policy split into separate Small Sites and Back Garden development policies.

	'The proposal would significantly alter the garden settings of the host dwellings through their fragmentation. This would not reflect, and consequently be harmful to, the historic pattern of development in the area which is one of the defining factors of the HWCA.' The biggest opportunity for developers in Hadley Wood is to build on the large rear gardens. Whilst this has already occurred in a number of areas on Beech Hill etc, the developers are clearly looking at the rear gardens in the Conservation Area as a potential opportunity. The Neighbourhood Plan therefore has an opportunity to reinforce the two separate findings of the Planning Inspectorate that found rear garden development in the Conservation Area to be harmful to the character of Hadley Wood. I can't emphasise enough how much it is to the benefit of us all (not just in Hadley Wood) to preserve biodiversity. Hadley Wood has valuable resources for nature to thrive, we need to keep it. Perhaps try and address light pollution caused by the growing trend to illuminate back gardens all night with outside lighting. This is also harmful to the habitats within the wildlife corridors existing along our back gardens where owls and woodpeckers live. Stop flats in Hadley Wood and stop building in the rear of gardens.	
HW-C6 (p48)	**Flooding risk** *Development must not increase flooding and waterlogging*	98% of the respondents “strongly agreed” or “agreed” with the proposed policy. No noteworthy comments. **NP change**: none required.

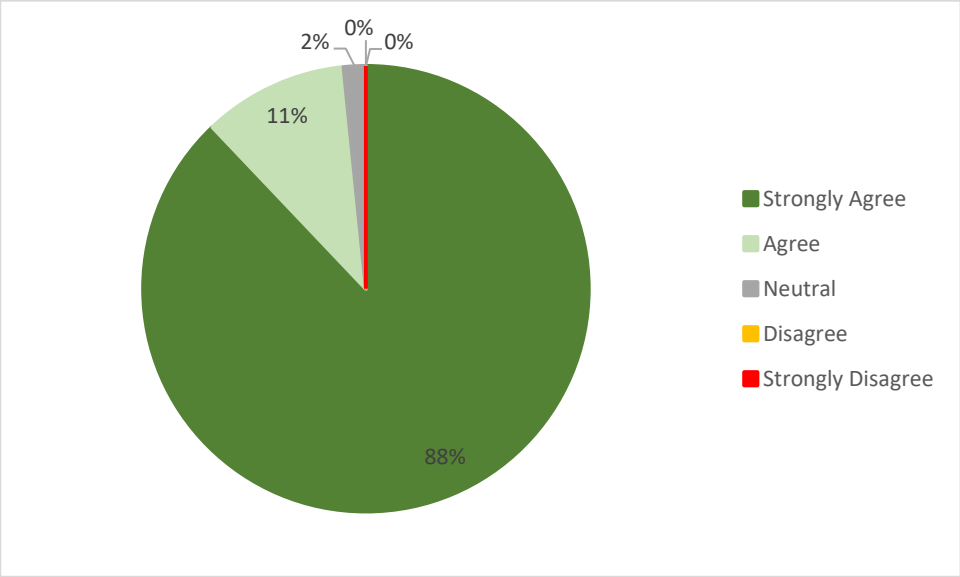
	 In addition to Parkgate, another street that has seen regular surface water flooding is Lancaster Avenue. The houses at a low point in the road have been flooded a number of times in recent years when gulleys in the road are blocked or overwhelmed. I have photos and videos that illustrate this flooding.	
HW-C7 (p49)	**Sustainable drainage (SuDS)** *Development must incorporate SuDS to improve drainage*	97% of the respondents "strongly agreed" or "agreed" with the proposed policy. No noteworthy comments. **NP change**: none required.

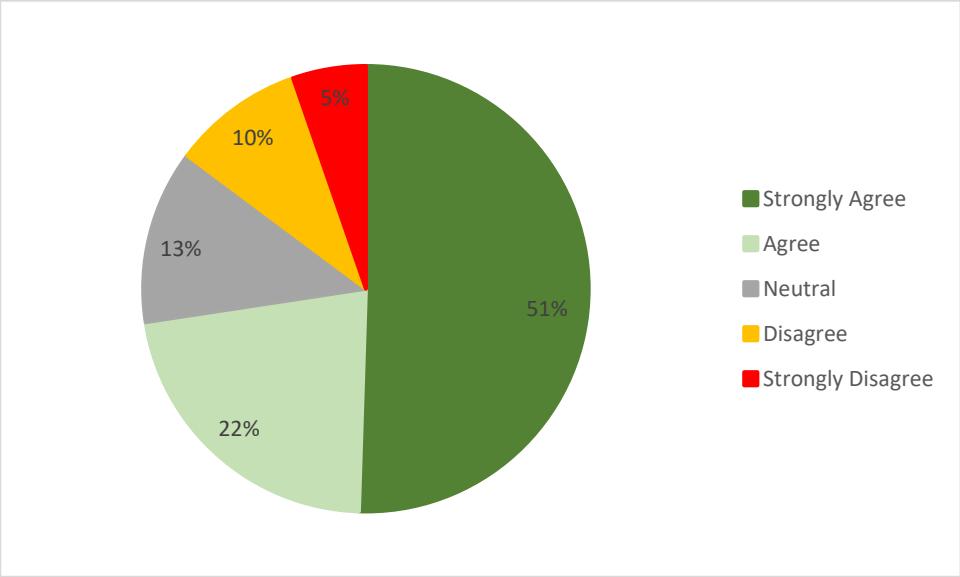


Add key focus on surface and groundwater, existing problems in specific areas, e.g. Camlet Way, slope down to Crescent East, need to improve protection ([*xx xxx illegible*] stop getting worse), deep foundations, loss of all vegetation.

HW-iv (p54)	**Green Belt surrounding Hadley Wood** Development on neighbouring Green Belt land will be resisted  I would resist overdevelopment of the greenbelt but would not be against high quality development in keeping with the existing character of Hadley Wood if it include appropriate upgrades to local infrastructure and transport links. I am very concerned by the concept of building on the Duchy of Lancaster green belt land between Camlet Way and Crescent West. in particular the development would affect the catchment area of Monken Mead brook. The risk would be of increased flooding downstream due to more run off rather than absorption of water by fields. In addition, there would be increased pollution of the waterway which would put wild life in the golf course lakes and other streams at risk. This would be an irreversible development for short term financial gain. It would do nothing to provide feasible extra housing for those in real need, i.e. essential workers. The local public transport is inadequate to meet their needs for getting to work, education and health provision. This would be an environmental disaster which must not go ahead.	97% of the respondents “strongly agreed” or “agreed” with the proposed policy. Comments were supportive. **NP change**: none required.

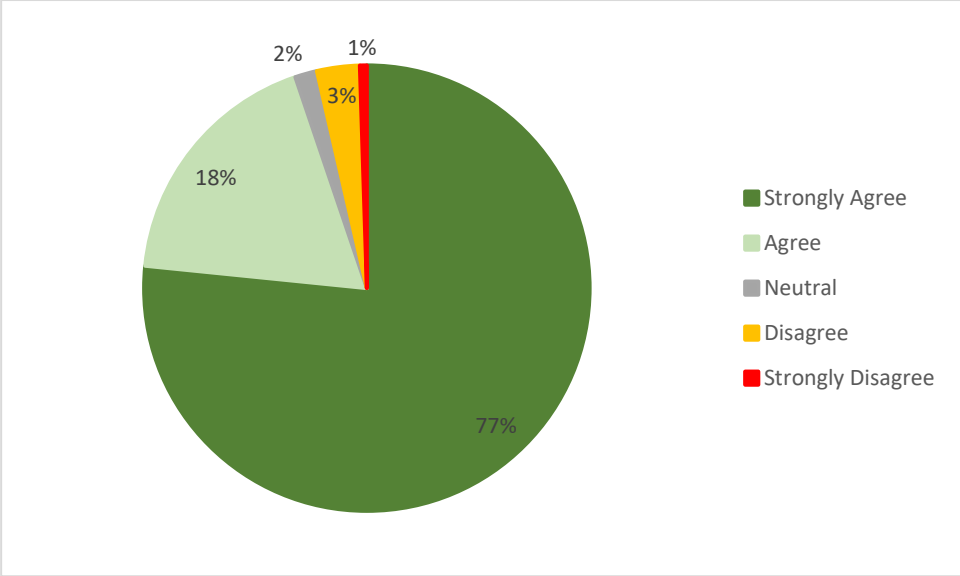
	Protection of the existing Green Belt should be paramount, given its importance to the community as a whole. I am particularly concerned at recent proposals to develop on the Green Belt in the area to which we have strongly objected for environmental, sustainability and lack of local infrastructure reasons. Not a suggestion but crucial to save the Greenbelt. Essential to maintain existing Green Belt Maintaining the Green Belt is vitally important, reasons being around environment, conservation, wellbeing, and climate change. Important. Once approved by Planning and by majority of community members: could work commence - Green Belt - needs constant vigilance. The special character of Hadley Wood as an area of restricted residential development is complementary to the environment of the surrounding Green Belt. Hadley Wood is not a suitable location for residential intensification which would seriously damage the present successful balance struck between man and nature to the detriment of the local environment and the local community. The Council have a duty of care to prevent any development which would have a damaging impact on the local community and its legitimate interests.	
HW-C8 (p56)	**Local Green Space designations (incl. Green Belt)** *Open spaces within the NP area will be even better protected*	98% of the respondents "strongly agreed" or "agreed" with the proposed policy. No noteworthy comments. **NP change**: None required, but more detailed and robust justifications added for each proposed LGS designation.

	 Duchy of Lancaster need to endorse HM-C8 to demonstrate they have resolved their potential Conflict of Interest.	
HW-HD1 (p61)	**New housing development & mix** *Create wider housing choice (downsizing, smaller family homes)*	73% of the respondents "strongly agreed" (51%) or "agreed" (22%) with the proposed policy. 15% of the respondents "Strongly disagreed" or "Disagreed". Therefore, although a majority of the respondents were supportive, this proposed policy received the lowest level of support. Discussions, including at the public meeting, highlighted that this was mainly due to growing resentment at the increasing number of single family dwellings being replaced with apartment blocks, especially as those do not offer realistic downsizing

	 I do not agree with further development of Hadley Wood, the prospective new developments will destroy the green spaces and beauty / heritage of Hadley Wood. My view is to strongly oppose any form of development / building of flats etc in Hadley Wood. Hadley Wood is a small, scenic, green village and we should all be investing our energies into retaining the beauty and tight knit community that we have. The number of Flats being built in Hadley Wood is going to be detrimental to the area. The price of the flats are not affordable and therefore cannot be purchased for those wishing to downsize. Cockfosters Road has already changed and as things are going Beech Hill and Camlet Way will follow. There is now planning permission granted for Flats on Lancaster Avenue. Hadley Wood is an aspirational area with large houses, knocking these down to build flats will be bad Hadley Woods Character. In the case of smaller homes the plan should be made much clearer that these smaller homes should be houses, not flats. As it is currently worded, it could encourage and support further building of 'luxury apartment' blocks, which is already a serious problem and is harming the character of Hadley Wood.	opportunities for existing residents or starter homes for their children. **NP change**: ○ amended the wording to elaborate on the aim of the policy, what housing is encouraged and how this fits in with Enfield's broader housing strategy. ○ Introduced new policy on Conversions into flats (HW-11), which builds on DMD Policy 5.

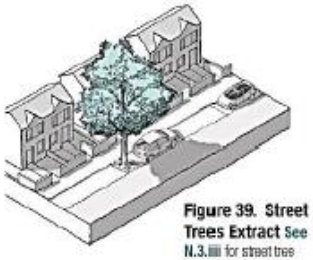
	I think this is confused. Are we trying to prescribe what developers should do? Where is sheltered housing. Flats but limited number. There is a policy 1/5 in houses areas, recently upheld in Walmar Close appeal (so live policy), linked to intensity. Would be good if nurses/teachers/policemen could live in Hadley Wood. Much smaller properties needed. Restrict new builds to 5 bedrooms. Small rental properties if possible, e.g. housing association, to develop a mixed community. Smaller properties for downsizing. Restrict building of large flats (as on Camlet Way) which are as expensive as houses. Smaller affordable properties to be made available to housing associations for rental purposes. Smaller affordable properties: widows/widowers to downsize for those that want to stay in Hadley Wood. ++++++++++++ The draft NP discusses site allocations but is unspecific about any particular location for a site allocation. Question: Is there a need to make reference to Site SA45, currently being consulted on in LB Enfield draft Local Plan, in the draft NP? Note: There is a current draft site allocation, 'SA45 Land Between Camlet Way and Crescent West' in LB Enfield's draft Local Plan and was consulted on under the recent Regulation 18 consultation ending in September 2021.	

	Following publication of a Statement of Common Ground (SCG) was signed by LB Enfield and LB Barnet in February 2022, including Site SA45, Paragraph 14.1, pages 8 and 9 in the SCG above. The SCG states in relation to the above site: 14.0 Site Proposals 14.1 LB Enfield's draft Local Plan allocates site SA45 Land Between Camlet Way and Crescent Way for housing (160 homes proposed). The site is adjacent to Green Belt in LB Barnet. LB Barnet is concerned that any development on this site should not have a significant detrimental effect on the openness of the Green Belt. The site is adjacent to the Monken Hadley Conservation Area. The Monken Hadley Character Area Appraisal describes this land as 'almost completely undeveloped agricultural land, included in the Green Belt ... The field boundaries are long established, as evidenced by hedgerows and hedgerow oaks. It is likely that the field patterns reflect early enclosure which makes them of considerable historical significance.' LB Barnet will resist proposals which have a harmful impact on the Conservation Area's character and appearance, including its setting. LB Barnet requests that both the Green Belt and Monken Hadley Conservation area are specifically referenced within site allocation SA45. Agreements: • Both LB Barnet and LB Enfield will continue to seek a cooperative approach on site allocations that impact cross-boundary'. SCG Available at: https://www.barnet.gov.uk/sites/default/files/LB%20Enfield%20SCG.pdf Question: Is there a need to clarify the NP terms of reference in relation to this specific site. The SCG mentions London Borough of Barnet position and Monken Hadley Conservation Area, but does not mention either material consideration of the draft Hadley Wood Neighbourhood Plan nor Hadley Wood Conservation Area? Question:	

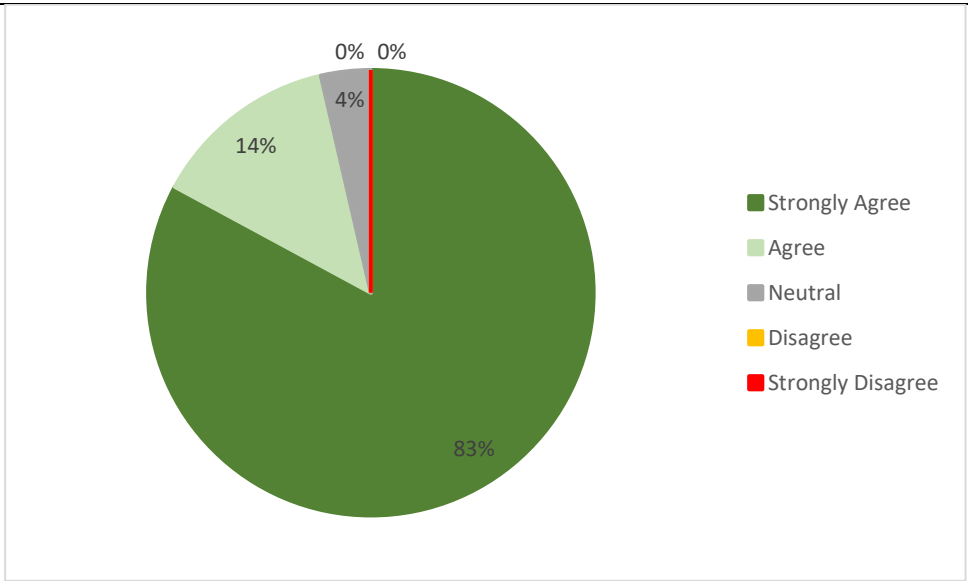
	Is there a potential for a Statement of Common/ Uncommon Ground to be prepared in relation to the LB Enfield draft Local Plan between LB Enfield and Hertsmere Borough Council? Note: The neighbouring local authority, Hertsmere Borough Council may have 'set aside' its draft Local Plan, over reported concerns raised in public consultation, about green belt development. On the other hand the LPA is held to be continuing with plan-making despite, (The Planner, 2022). The Planner, 2022, Hertsmere sets aside local plan- Newsmakers, page 11- summary, full article below. Available at: https://www.theplanner.co.uk/news/hertsmere-sets-aside-local-plan	
HW-HD2 (p68)	**High-quality built environment** *Development must reflect local architecture and spacing*  Stop these terrible boils springing up on the frontage of Crescent West houses. There seems to have been no control at all over retaining the conservation character.	95% of the respondents "strongly agreed" or "agreed" with the proposed policy. Comments reflect that what represents "high quality" is subjective. Several respondents felt that some new builds (and apartment blocks) do not fit in with Hadley Wood's character. **NP change**: ○ per the assessment of policy HW-C1 above, Hadley Wood's character has been better defined.

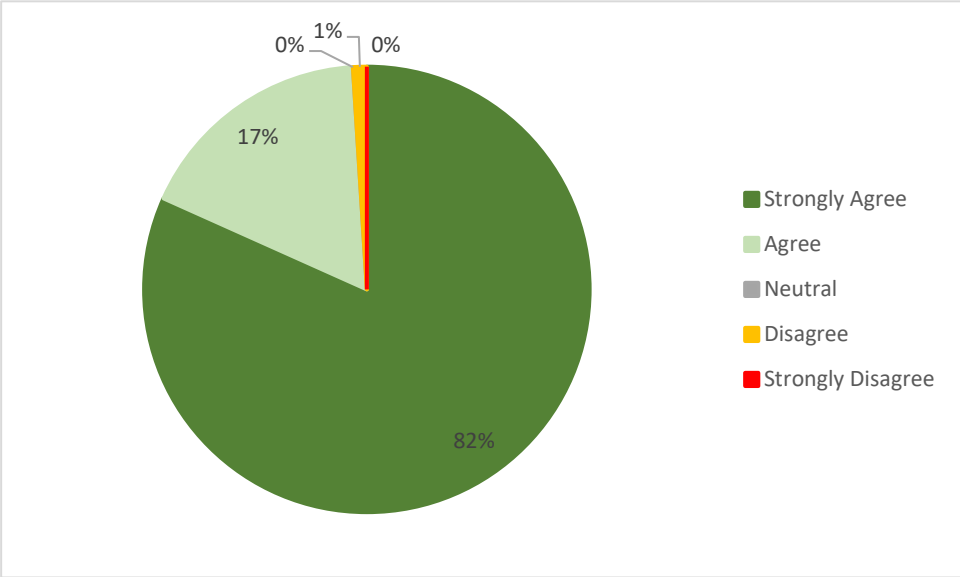
	We would like to see high quality contemporary architectural ideas and design to be encouraged to contrast with the older character properties where this sits appropriately and can maximise new lower energy use technology. I have not felt it relevant to click on any of the items above as they are, without exception, desirable policies and any difference between "agree" and "strongly agree" is too subtle a distinction for me. However, this document fails to address what I consider to be, together with the risk of losing neighbouring Green Belt, the greatest threat to the character of Hadley Wood. That is the creeping expansion in the number blocks of flats. For a proposed policy that puts so much emphasis on the minutiae of design for houses and front gardens it strikes me as very odd that there is no reference to these large ugly buildings. As well as changing the appearance of the neighbourhood, these flats are also bound to change the demographics of Hadley Wood. We are lucky to live in a area of one-family houses. The new blocks are, in contrast to the existing vibrant community, largely made up of older folk who no longer live with children. Do we want Hadley Wood to become a centre for retirement blocks? Affinity Water leaflet states that in five years and beyond there may not be enough water to meet the needs of everyone living in our region, so how can we have 160 new houses here? To maintain, enforce as necessary any restrictive covenants which prevent over-development in accordance with current policies. I would like new housing to be sympathetic to the style of Hadley Wood- no high rise buildings etc. More consideration given to proposed buildings to maintain character of the area. I am also open to have more contemporary properties in Hadley Wood as a mixture of traditional and modern creates a nice diversity of houses.	

	The plan makes no reference to the increasing number of 'gated developments' in Hadley Wood e.g. Douglas Close. These gated developments are totally out of line with the character and open and friendly community spirit well noted in the plan, and further gated developments should be strongly resisted. I would urge guidance on 'gated' developments to be included in Appendix 1: Planning application guidelines. 5.16 - Front facing rooflights - I would suggest a stronger statement here in relation to front facing rooflights being not supported, as they have a serious impact on the character of the street. A good example here is in the Conservation Area at no 25 Lancaster Avenue, which was converted into flats in the last 5 years, including multiple front facing rooflights. The Conservation Area protections were not enough to prevent the harmful addition of rooflights here, and Enfield Council Planning have had very inconsistent approached to rooflights on the front elevation in recent years in the Conservation Area. The opportunity to make a clearer statement on rooflights is missed as it stands in the plan. Our NP should provide specific local area character & protection. More work (input by streets) but the most potential benefit. Otherwise I am not sure how much benefit we gain from repeating existing Enfield policy. The preferred maximum height of five storeys in the draft NP is supported. ++++++++++ The Statement of Common Ground (SCG, see comment on 5.4 below) between LB Barnet and LB Enfield, mentions LB Enfield's emerging Development Management Policy DMD DM6, indicating Hadley Wood, (see SCG paragraph 12.4, page 7), as a location for Tall Buildings, Figure 7.4 of 39 metres, i.e. approximately 12 storeys. From the ground level of the view of an adult, the horizon may be obscured over 8 storeys, twice the height of the 20th century apartments at Crescent West (4 storeys). An emerging policy proposing 12 storey buildings in the context of HW may be excessive. Exceptionally considering 8 storeys maximum height may preserve sky views	

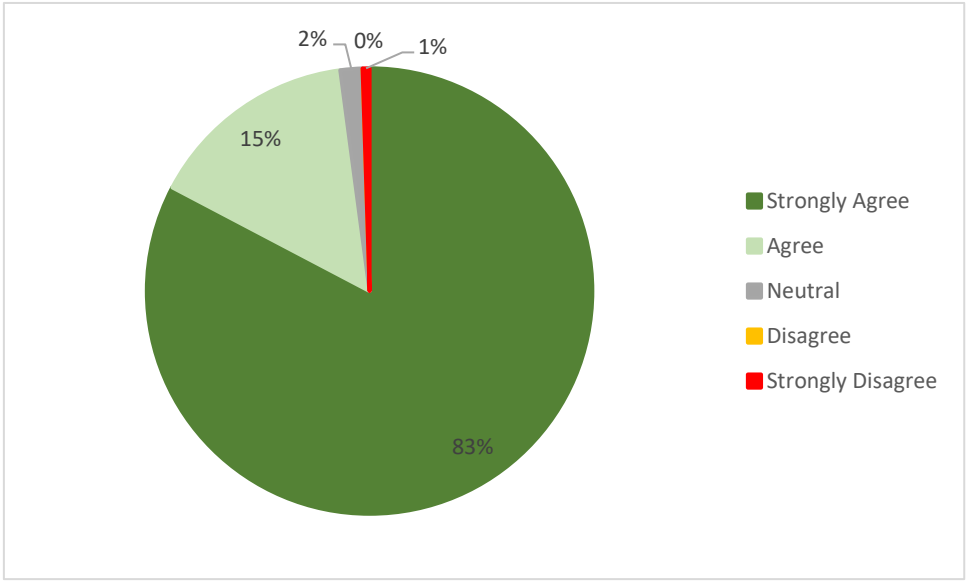
	when viewed from the public realm in proximity and thus preferable in the context of HW, over the emerging policy above. Copy of DMD DM6 is available at: https://enfieldsociety.org.uk/documents/localplan/extracttallbuildings.pdf Is there a need to stress the New Model Design Code, 2021, referred to in paragraph 110(c), National Planning Policy Framework, 2021. SDG 11 suggests that: 30% Streets and Open Public Spaces; 10-15% Parks and Open Spaces Reference: https://sdgs.un.org/topics/sustainable-cities-and-human-settlements. Principles of the New Model Design Code, 2021, with [possible additional notes], see below  **Figure 39. Street Trees Extract** See N.3.iiii for street tree design principles **Figure 38. Biodiversity Design Principles Extract. See N.3.ii** for a range of biodiversity design principles Reference: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957207/Guidance_notes_for_Design_Codes.pdf The Code principles may reflect criteria for potential mitigation on themes for example: • Heritage assets C.2 Cultural Heritage '11. Well-designed development adds a new layer to the history of a site while enhancing and respecting its past, with the expectation that new development will be valued for its heritage in the future as heritage assets are today. 'C2.ii (15) The presence of such historic character, either directly on the site, or nearby, should always be seen as an opportunity to add value to any development by helping to provide inspiration', (MHCLG, 2021(c)).	

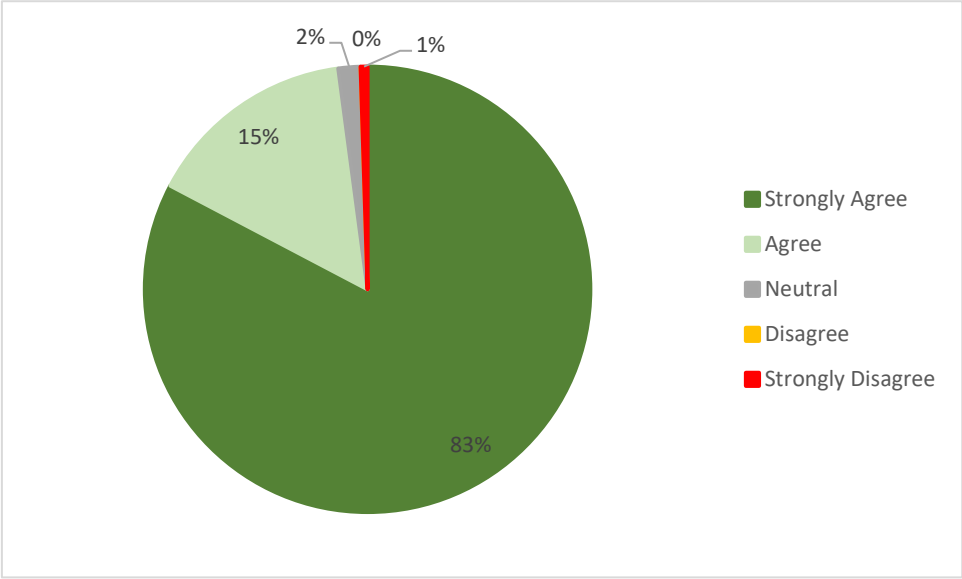
	• Masterplans and open space • Nature, 'Biodiversity design principles' Zoning for development: N2 Water and Drainage: 7.1 Buildings should leave sufficient buffer zone for watercourses to be maintained; Opportunities for walking and cycling routes along these 39. Setback zone for buildings iii Biodiversity: All schemes will be expected to follow national policy by achieving a 10% net gain in biodiversity; Schemes should incorporate biodiversity design principles, e.g. creating and enhancing habitats. See N.3 Biodiversity All new streets should include street trees. See N.3.iii Street Trees P1(i), 51. Outdoor seating or displays; 59. Green Infrastructure zone parking zone/ verges/ swales/ rain garden may be provided, [open water courses; reducing need to culverted water courses; uncovering/ daylighting watercourses] P.2(iii) 63. paragraph 141, Home zones- local street layout and design Parks and open space; [allotments and community gardens- part of open space] The grounds for this comment are: At a Public Meeting on 21/6/2022, there were a concerns for what the future character of HW may be like and whether specifically sympathetic development was likely in the neighbourhood. There was a shared desire for the need for more than just large houses and large units of flats, especially where affordable housing was required.	
HW-HD3 (p72)	**Heritage assets** *Important historical buildings must be protected*	96% of the respondents "strongly agreed" or "agreed" with the proposed policy. Comments highlighted a few minor drafting oversights and improvements, and there was a suggestion that the

	 Important to retain and respect the Conservation Area. The plan refers to the Conservation Area being located 'along the Crescent'. It should refer also to part of Lancaster Avenue (odd numbers 1 - 33) as also being part of the Conservation Area - for clarity. I would suggest that the plan should also include the aspiration for a more formalised 'Hadley Wood Conservation Area Study Group' being created as an important mechanism for local views to be provided to Enfield Council in relation to planning applications and other issues that affect the Conservation Area. Most other Conservation Areas in Enfield have active Conservation Area Study Groups, however, the Hadley Wood group has never properly got off the ground. The plan should include the request to Enfield to review and update the Hadley Wood Conservation Area Appraisal and Management Plan in light of policies outlined in the Neighbourhood Plan - when it is approved.	Hadley Wood Conservation Area Group is reviewed and enhanced as it does not currently function as intended. **NP changes**: ○ corrected minor drafting oversights and improvements. ○ Added encouragement for the establishment of a Conservation Area Study Group.

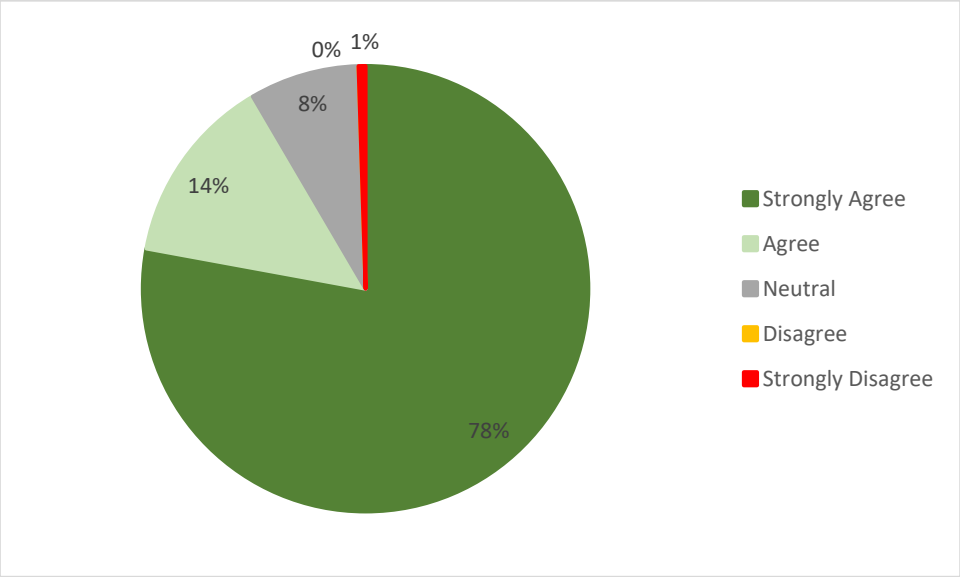
	This should include a description of the Conservation Area Character Appraisal and Management Plans - with a particular emphasis on how these policy documents are aligned with the aspirations and proposals outlined in the wider Neighbourhood Plan. I would be happy to help draft this piece. 5.17 - this section misses reference to the Conservation Area Character Appraisal as a description of the Conservation Area.	
HW-HD4 (p74)	**Construction activity** *The Considerate Constructors Scheme must apply*  Building sites are an eyesore with rubbish being blown onto neighbouring properties and litter being dropped on the streets. There should be rules for parking of vans and lorries outside sites. Developers do not seem to pay any attention to the damage they cause to our roads and grass verges. This should be specifically addressed.	99% of the respondents “strongly agreed” or “agreed” with the proposed policy. Comments, both made online and at the public meeting, highlighted the main (or sole?) concern to be that parking of builders’ cars and vans is a major issue, as it not only hampers the free flow of traffic but also highway safety. **NP change**: ○ added specific language to the NP policy to deal with parking near building sites, noise and other nuisance.

	More considerate parking by developers and their staff. More considerate use of traffic lights to minimise inconvenience. Parking should be limited to residents & a max of 6 tonnes for any traffic. Builders vans should be charged £100 a day to park - they effectively reduce Lancaster & Camlet Way / Beech Hill to single file. Improved car parking generally by construction workers to avoid congestion and, as well not parking across driveways, even for a short time while going to the shops. Could the NHP consider street parking in Hadley Wood? In particular, the pressure of parking on Crescent West? In addition, some roads are a nightmare to drive down as a result of the huge number of cars & construction vehicles used by builders (currently Beech Hill); is there anything the NHP can do to improve this situation? The Council should move quickly and promptly to make good all roads and pavements once a developer has completed building works. Currently roads and pavements are left in a ruined state long after the developer has moved on. Sometimes the pavements and roads are not fixed at all and remain in a state of disrepair for years. Where possible, developers should be obliged to do the work themselves to a certain pre agreed standard that matches or improves the immediate area that their lorries and other vehicles and plant equipment have damaged whilst construction has taken place. Considerate Constructors Scheme should also apply to the various utility companies. There should be liaison to prevent multiple disruptions to our roads. Add required construction plans, including traffic. Our Plan can point out our pinch points (e.g. Waggon Road) if more than one site active at the same time. HD4 = already	

	usually required. [*xx xxxxx illegible*] better to recite the requirements directly "Hadley Wood construction condition". Important issue.	
HW-SF1 (p76)	**Social and community facilities** *Community buildings must be retained and improved*  Shopping parade - would be lovely to make this more pedestrian focused where not just Pananis, we can sit outside to drink and eat and chat. Hopefully another restaurant will succeed where others have failed (not sure why). Chinese or Indian perhaps?? :) No licences at local restaurants to play music after 10:30. All restaurants to close by 11:00 latest. No extensions. The community feel of Hadley Wood is dependent on the area around the park and tennis courts and the HWA building so I think it is vital that these areas are maintained.	97% of the respondents “strongly agreed” or “agreed” with the proposed policy. No noteworthy comments. **NP change**: none required.

	When funds are available, larger hall for dancing, yoga, etc.	
HW-SF2 *(p77)*	**Crescent West local shopping parade** *Shops must be retained and the public space enhanced*  Hadley Wood needs Crescent West shopping outlets with a public house! Shops should be retained which are of local use. The dry cleaner should not have been replaced by "design" shop. We need useful shops like bakery, post office, cleaner. This parade is vital to the whole of Hadley Wood - for those who live in Hadley Wood and never use the Parade they are missing a real treat. The staff and owners of the businesses are all so special and supporting it really is like a [*xxx illegible*] village. I hope the restaurant will re-open with the right formula. I'm sure everyone would be happy to support the right well run restaurant.	97% of the respondents “strongly agreed” or “agreed” with the proposed policy. Comments highlighted the desire to keep shops such as a bakery, post office and dry cleaner, as well as a restaurant. **NP change**: ○ added wording to strongly encourage the Council to do everything within its power to help ensure the long-term viability of the local shops and eating/drinking establishments in the Crescent West Local Parade and to resist change of use to activities that do not benefit the local community (including housing).

	Local Parade: comments on how to improve the look of this facility within the NHP are noted. Whilst it is nice to have a variety of shops, particularly useful facilities, e.g. post office would be extremely welcome. Include ways to ensure a restaurant can be sustained in Hadley Wood. The shopping parade should be upgraded and protected. Parking should be available to their customers/clients. If no parking is available, shopping will go to the big shops in Barnet or Cockfosters which will be detrimental for the HW Community as there is ONLY ONE small "Corner-shop" which is doing its best to cater with extensive stock. This Parade had in the past offered good basic needs to this Community, if slowly these units become "offices" it will be a great loss! Review/rewrite to avoid our Plan inviting full development of the parade + flats (10 storey block, unavailable for 5 years).	
HW-AM1 *(p82)*	**Active travel** *Improve public transport and footpaths*	92% of the respondents “strongly agreed” or “agreed” with the proposed policy. Comments were varied, but quite a few commented on a) the need to improve bus services, and b) vegetation overhanging the footpaths. **NP change**: ○ expanded the wording on bus services; ○ added a requirement for homeowners to cut back vegetation that overhangs the footpaths, referencing the legal requirement.



Better public transport, cycle lanes and a 20mph should be an aim of the Plan.
Public transport including buses - I am especially passionate about it being maintained. There are many who rely on bus route. This needs to be maintained as well as train routes.

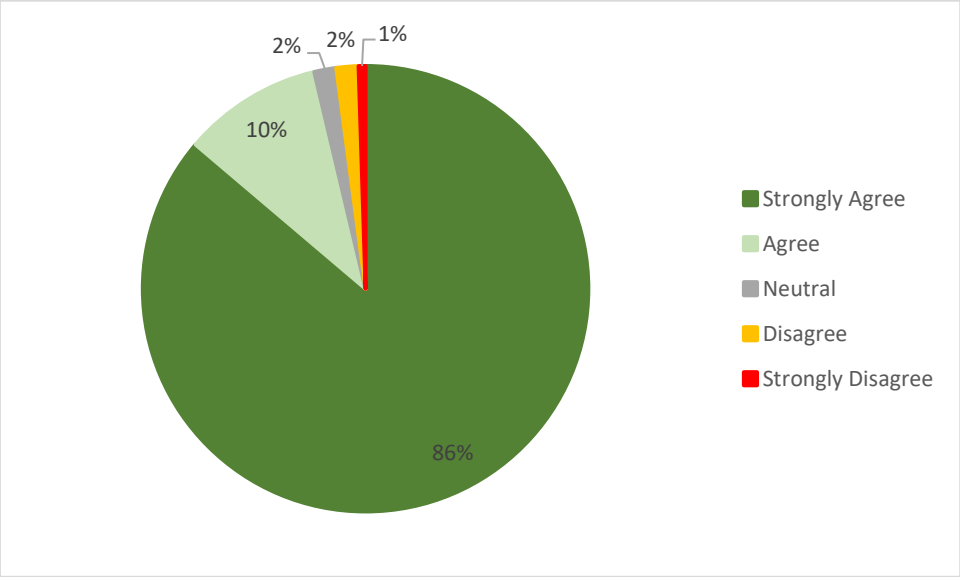
Roads should allow cycle paths to be made a priority.

The pavement route to High Barnet is noisy and impassable sometimes due to hedges & pavement parking. We urgently need a footpath through the Green Belt to Hadley Common.

Safe walking routes - much has been made of this in the draft NHP. The current walking route along Camlet Way to High Barnet has been made unsafe by the pavement becoming too narrow, as many of the houses on Camlet Way (predominately in the borough of Barnet) have allowed their hedges & trees at the front of their homes to grow over at least half the pavement width. Therefore, can the NHP use its influence to have these cut back to their boundary line, so that the full width of the pavement can

	be used safely by pedestrians. To ensure this does not happen within Hadley Wood, could there be an additional clause added stating that houses must ensure their garden hedges/trees do not impede use of pavements? Happy to update para 7.6 to reflect HWRUG's achievements at the station since 2019. I struggled to find the graphic referenced in Aspiration HW(xii): Active Travel Projects which is said to show the new and improved routes listed. Figure 35 appears to show the Conservation Area, not the new routes. Please direct me to the relevant graphic. I strongly oppose the increase of transportation links. If the green light is given to improve transport links, footpaths and cycle lanes it will increase footfall, congestion on the already narrow roads which are unsuitable for buses. This will further impact the air quality and safety of our neighbourhood. Hadley Wood will lose its character and become like every other urban and built up postcode in London! I am strongly in support of the proposals outlined here. However, I would suggest including reference to the significant investments already made by Enfield Council and others in the Enfield Chase Restoration project (in particular the new cycle path and tree planting / wetlands creation from Ridgeway to Ferny Hill / Trent Park) - and the missed opportunity in not extending the cycle path to Hadley Wood as part of this project. As there is only c1km left to join Hadley Wood to this path (at the end of Waggon Road) - giving much easier and safer year round access to both Trent Park and to Enfield Town and its beautiful country parks - Whitewebbs, Forty Hall, Hilly Fields etc. This project should in my view be prioritised when the CIL funding is available. In relation to the 399 bus route - it should also be noted that increasing the hours of operation of this route would also give school children who are attending school in Barnet - eg QE Girls, QE Boys etc - the opportunity to travel by bus and take more cars	

	off the road as the public transport option is a lengthy journey getting the train to New Barnet and the bus from there to High Barnet. Page 20 - HW Tomorrow 3,7 Objective 06 - Reference is made to extending the 399 route to Cockfosters. This must not be done at the expense of slowing the existing time from HW to Barnet. Possible the 399 times could be better synchronized to the time of the Cockfosters Rd buses running between PB and Cockfosters. Extension of the 399 bus service to Cockfosters. This must not be done by extending the total travel time for the 399 service from HW and Barnet. HWA should encourage residents to use the local bus. The alternative is that the bus service could be withdrawn by TfL as the 389 and 399 are the least used bus services operated by TfL. Improve bus access to the tube at Cockfosters & to the shops / doctors surgery in Cockfosters. Improve bus services to Cockfosters and Barnet High Street as parking in both areas is limited. Public paths overgrown with brambles (at eye level), nettles, & long grasses, especially along path to shops & station.	
HW-NC1 *(p88)*	**Developer contributions** *Agreed share to benefit the local community*	96% of the respondents "strongly agreed" or "agreed" with the proposed policy. Comments, both online and at the public meeting, were very supportive but highlighted the need for improved transparency on CiL payments, and who will set the local priorities.



The whole process regarding developers contributions needs to be more open and transparent. How much do the developers in Hadley Wood pay each year? And how is it spent? Is it spent in HW? If not, why not?

I note that the 25% developers contribution will be used to improve community facilities and in particular the HWA Centre which is very positive, especially if in partnership with fundraising.

The Hadley Wood Association is the most democratic local community organisation and so should be highly considered when it comes to agreeing where CIL funds are spent. Other local organisations should also be consulted for example St Paul's church, tennis club, non-profit pre-schools, other religious and non-profit organisations.

I believe there is an opportunity to put forward a vision for the HWA land holding and the field adjacent to Bartrams Lane (Duchy of Lancaster) that would respond to the flood risk,

NP changes:

- added the desire for greater transparency on CiL payments.
- added wording on the process of setting local priorities.

	provide cycle access and enhance biodiversity. The CIL contributions from development could go towards a plan to: 1. Create a Nature Reserve covering the HWA land, cuttings land and Bartrams Field land. I have recorded over 30 species of birds in this area. 2. Create a wetland area (ponds/lake) in the Bartrams Field to relive stormwater runoff through the culvert. This would provide a natural flood defence for the existing stream running through the site. This would further increase biodiversity in the area in support of the Nature Reserve application. 3. Use CiL money to fund the creation of a wild flower meadow in the sloping grass area above the playing fields. 4. Use CiL money to create a community orchard in the top field area above the childrens playground. 5. Use CiL to fund a boardwalk, cycle path through the Bartrams Fields to connect up with the existing paths/cycle network. 6. The facilities would then be available for the primary school for a range of nature related studies and field work. I would like the plan to acknowledge that the school is a community asset and to propose that it should be able to access the CIL fund. Hadley Wood primary school is at the heart of our community. It would seem appropriate that some of portion of CIL (developer contribution) money available for local initiatives could be allocated - if deemed appropriate - to initiatives and projects at the school. I am Chair of Governors at Hadley Wood School, and I know it would have a huge impact on the school if a portion of future CIL funds could be used to contribute towards initiatives that the school is working on to improve the environment and outcomes for children.	

	Is there a need to require that an Infrastructure Delivery Plan is prepared, consulted, monitored and reviewed, on an annual basis.	
	Other Comments **NP & Survey Drafting** The HWA refers to feedback provided to the HWNPF in meetings, emails and otherwise. Many of the policy matters are difficult to ascribe across the whole area and should be applied following consideration of each development. Development is not bad as the opening position. Every property was "developed" at some point. Development/use of land is good if carried out sensibly and with consideration to the surroundings. A big concern is the policing of all of these policies. How will all these policies be policed and by whom and what happens if/when they are ignored or breached (which happens regularly)? It says within the NHP that the NHPF & HWA will work together re breaches - more detail on how would be appreciated. HWA - the role of the HWA does not seem to have been particularly highlighted within this document, when much has been made of community facilities. It is the HWA who leases (and therefore protects) some of the greenbelt land, as well as runs the HWA Centre which allows the tennis club, pre-school, ballet school and bridge club to exist and function. Its existence is therefore key. Could this be improved upon if the NHP is revised? I think it very important that the NHPF and the HWA (the resident's association) work together on the Neighbourhood Plan to achieve the best outcome for all residents. Very well thought out plans for the area.	**NP change**: ▪ Added that the NP policies will effectively be enforced through Planning Department.

	My entire family reside in Hadley Wood. It is for this reason that I Strongly Agree with The Hadley Wood Neighbourhood Plan, and their effort to preserve and improve this wonderful oasis-- Founded in 1850 with the creation of the Hadley Wood Railway Station by Sir Nigel Gresley. It must be guarded, protected and preserved! In response to the Reg 18 draft Enfield Local Plan a number of studies were commissioned which are highly relevant to the the NP and which ought to be referenced in the NP as part of the evidence base for the current policies. These include the Landscape and Green Belt appraisal undertaken by Enplan; the Heritage Appraisal undertaken by JB Consulting, the Walkability Index undertaken by Space Syntax and the Sustainability audit prepared by Hadley Property Consultancy. Very sensible proposals that ensure Hadley Wood will retain its essential character for generations to come. I fully support the plan to protect and enhance the 'village' character of HADLEY WOOD, to preserve the Green Belt and to encourage greater housing choice to meet the needs of our community. This is an excellent Plan designed to retain the traditional 'Garden Village' nature of Hadley Wood. Implementation of this Plan will go a long way to maintaining that position. I feel this document /plan is extremely contradictory I am confused as to whether your organisation is representing Hadley Wood Residents or the Developers/ Enfield Council. This questionnaire seeks to be controlling and has been written in a way to promote the views of HWA and does not highlight or bring to light other negative issues that would arise as a result.	

	I commend the Hadley Wood Neighbourhood Forum for their dedication and hard work over many years and the production of an outstanding Neighbourhood Plan document, that includes many very strong proposals and ideas for the protection of, and improvements to, Hadley Wood. I am firmly in support of this Plan. However, I would like to make the following suggestions are areas where I feel the Plan could be improved. [*points listed under relevant policies above*] Lots of good content. Thanks! Needs reality checks: what difference to actual applications. ++++++++++++ Well done to Robert Wilson and all the team on this excellent draft local plan, which we at West Lodge Park wholeheartedly support. Although the hotel is fractionally outside the area under consideration, in practice we are part of the Hadley Wood community, and proud to be so. The Beale family, as owners of the hotel, have been here for four generations since March 10th 1945, and although many changes have happened to Hadley Wood since then, the leafy and spacious character of this lovely area has been largely maintained. At West Lodge Park we have done our bit with sympathetic add ons to the hotel over the decades, and the planting of a now nationally renowned Arboretum with 800 species of trees, 3 National collections, 15 champion trees, and about 4500 trees in total. So we are full subscribers to the model of sympathetic and sustainable development, and quiet improvements that benefit everyone. We don't believe householders or businesses should stand still, we should all be continuously improving our properties and our neighbourhoods, but quality never goes out of fashion, and as my grandfather Edward Beale used to say, "there is always room	

	at the top" - so in Hadley Wood we should aim high for both a quality built environment and a quality natural environment. Very well done on the draft local plan for Hadley Wood. **Speeding** Speed camera on the bend of Wagon Road, up by 128/130. Cars speed down the road, there have been several bad accidents over the years and we have young children who could be harmed. We have put up a front fence and gate but it is a residential area so the speed limit should be 30mph like the rest of the area. Speeding traffic is problem in the area, some form of traffic calming would be welcomed and enforcement by Enfield Council is also key. Driving speeds - is it possible to make the whole of Hadley Wood a 20 mph zone? Could speed cameras be added to the particular roads used as motorways? I have only glanced through the whole document but noticed that you want to implement a 20mph zone in Crescent East & West. Again very commendable but totally impractical. Let's just make sure the 30mph is adhered to for now! The traffic has increased, especially along Beech Hill- Camlet Way; these roads, together with Wagon Road, Lancaster Avenue and Beech Hill seems to be a "shortcut" between Potters Bar, Cockfosters/Enfield and Barnet, the speed is, at times, well over 30mph, rendering them dangerous. Perhaps a 20mph limit should be implemented throughout, taking into consideration that part of Camlet Way's footpaths are very restricted, and Wagon Road has no facilities for bikes, nor pedestrians.	

	100% support for all policies and aspirations in the Neighbourhood Plan. Stronger compliance and traffic calming measures would be helpful. Efforts to be taken to make motorists aware of 30mph speed limit in Waggon Road, nearly all cars exceed 30mph. Speeding in Waggon Road is a major safety concern. We have observed many accidents on the blind bend beyond our house. I think removing the derestriction sign between Enfield and Hertfordshire would immediately help and ensure the safety of children, walkers and cyclists. **Enfield Planning** Before any plans are approved there should be a professional report setting out whether there are sufficient parking, supply of water and drainage and public transport facilities to cope with the outcome of the plan. The Enfield Planners need to be far more approachable to residents that have questions about planning that they have been notified about. The planners seem like ghosts they are not contactable. They seem to only protect the developers. As a resident for over 30 years we have seen the area evolve massively, not always positively. This is an extremely worthwhile initiative and if implemented, will retain the character of our beautiful area before it is over-developed and unappealing.	

Appendix C - Enfield Council 14 July 2022 feedback review

	Enfield comment	Action
	Green Belt	
1	Some wording, such as para 4.50 is open to misinterpretation and appears to oppose legitimate "appropriate" development, which would breach the NPPF. Vision and Chapter 4 should be reworded to protect the Green Belt from "inappropriate development".	*Green Belt section updated and clarification added that inappropriate development is opposed.*
2	The London Plan should not be interpreted as looking to extend the Green Belt, as para 4.52 states.	*Para 4.52 reflected the draft London Plan. The para (now 5.5) has been updated.*
3	Concerning that Aspiration HW(vi) on Green Belt protection selectively quotes strategic policies. We should also note London Plan para 2.3.1 and 8.2.1.	*The Aspiration (now HW(iii)) has not been updated, but Section 5 reflects Enfield's comment and explicitly notes that Green Belt boundaries may be changed in certain circumstances.*
	Character, Heritage & Other Design	
4	Add a disclaimer that not all policy may apply in the conservation area.	*Added disclaimer in para 4.39.*
4	Chapter 4 has generic statements about local character, but doesn't detail what that comprises.	*Character summarised in para 4.4, referencing the Heritage and Character Assessment, and Appendix 10 (Evidence Base) highlights other local character and heritage sources that have influenced the NP.*
5	HW-C1 (Character, setting & views) needs further clarification – clause d) should specify if it applies to extensions and replacements, or to new builds as well.	*Added.*
6	HW-C1 - the requirement to use pitch roofs to all sides oversteps what we can require outside the conservation area.	*Unclear why design guidance would overstep what a Neighbourhood Plan can include. Changed to state pitch roofs to the side or crown roofs..*
7	HW-C1 - sections that repeat policies or that are explained in higher level policies should be removed.	*Policy HW-1 addresses issues that frequently occur, in spite of existing Enfield and London Plan policies, and the purpose of reinforcing the policies is therefore to encourage Planning Officers to give these considerations greater weight. Comment explaining that has been added to the Policy Box definition.*

8	HW-C1 – the requirements on PDs are unenforceable.	*PD comments have been removed from policies and worded as guidance.*
9	HW-C3 (boundary walls) – first sentence should replace "strongly encouraged" with "must be".	*Changed.*
10	HW-C3 – the second sentence can specify that solid front walls "(0.5m and higher)" will not be supported.	*Inserted.*
11	HW-C3 – the two bullet points on whether planning permission would be required don't belong in a policy as they're current planning law.	*Deleted.*
12	HW-C4 (Paving of front gardens) – where we discuss parking provision for 3+ beds, para 4.30 is not the accepted interpretation of "beds". That is generally taken to mean "bedrooms".	*Clarification received from Enfield: "beds" is taken to mean "bedrooms". Does not impact the policies.*
13	HW-C4 – if the NP proposes higher levels of parking provision there must be evidence to support this.	*Policy updated (now HW-4) and extensive justification added in Appendix 5. Shared with Enfield Council for comments and possible improvement.*
14	HW-C4 – the requirement to retain 25%+ of front gardens as soft landscaping can be improved by adding "unless individual circumstances render that not appropriate".	*Inserted (now Policy HW-3).*
15	HW-C4 – the last para needs checking because the installation of dropped kerbs and crossovers on unclassified roads do not usually require planning permission.	*Deleted from policy as it was simply guidance on when planning permission must be sought.*
16	The divide between policies and guidance is not always clear. For example, HW-HD2 requires planning applications "to demonstrate how they comply with the Hadley Wood Design Guideline".	*Reviewed all policies and deleted or moved the guidance comments.*
17	The Aecom Heritage Character Study should be reflected in the body of the text or included	Extensively referenced in para 4.4 and 5.17, with full report included in Appendix 9.

	as an appendix as it has good reference to existing conservation area policy and heritage significance.	
18	The first part of HW-HD3 (Heritage Assets) repeats existing policies, which should be removed.	*Policy (now HW-5) updated.*
19	5.25 & 5.26 suggest additions to the Local Heritage List, for which there is a separate process, so this shouldn't be in the NP.	*Agreed and changed to Aspiration(ii).*
20	Some information about heritage assets is confusing, e.g. HW golf club.	*Clarified that the golf club land is on the Local Heritage List, whereas the Club House and Stables are Grade II listed.*
21	HW-HD4 (Construction) – requires planning applications to include a Construction Management Plan in line with the guidelines in Appendix 4. Evidence/arguments must be provided if we want higher standards than the rest of the borough.	*Deleted the requirement for a Construction Management Plan, as well as the Appendix with the Hadley Wood Considerate Construction Guidelines, as that would be unenforceable. Policy HW-15 now mentions the key issues: follow the industry's Code of Considerate Practice, provide adequate parking for workers, and observe Enfield Council's time limitations on noisy building works.*
	Trees and biodiversity	
22	HW-C2 (Trees, natural environment & biodiversity) should be explicit with SMART objectives for preservation and enhancement.	*Policy (now HW-7) has been amended following guidance from the Council's Tree Officer, reflecting both the London Plan 2021 and the Environment Act 2021, with development to:* ○ *Secure a net biodiversity gain of 10%.* ○ *Protect all trees (not only mature trees).* ○ *Replace lost trees on a 2:1 basis as the simplest measurable SMART outcome.*
23	HW-C2 – a stronger evidence base on local trees and growth patterns will produce a stronger policy.	*See previous point.*
24	HW-C2 – ideally key tree assets form part of the policy; using Defra magic map, wildlife	*Amended to include Defra Magic Map Magic Map Application (defra.gov.uk) and an updated London Canopy Cover Map London Tree Canopy Cover.*

	trust data/objectives, bio records, ancient tree inventory, 'big tree hunt'.	
25	HW-C2 – a neighbourhood wide TPO is unlikely and unenforceable.	*Deleted. The Aspiration now focuses on mitigation strategies by Enfield Council to address the loss of trees prior to and during construction.*
26	HW-C2 – prescribing native trees is not good practice as a policy.	*Updated to capture low water demand trees and to encourage a mix of species, with links to specialist guidance.*
27	The plan frequently comments on preserving mature trees. Undervaluing younger trees risks a lack of succession.	*Agreed and removed "mature" in most instances.*
28	Adaptive management of the existing trees should be core to the policy, and align with Enfield's tree management.	*We appreciate that adaptive management is the ongoing and pro-active monitoring of trees, such as tree canopy cover, identification of important specimens, tree loss and replacement planting. This activity would appear to be outside the scope of the NP or the Forum to implement, and would welcome Enfield Council taking a stronger lead.*
29	A 2 for 1 tree replacement aspiration can be problematic for larger scale tree removal. Also, what if a tree is removed to resolve a problem? We can use London Plan G5 for local needs.	*Policies will always have some genuine exceptions, and the 2:1 replacement is a goal; already states that if it's not possible on-site then it can be sited elsewhere in Hadley Wood.* *More lenient rules for large scale tree removal would encourage the felling of trees. The London Plan Policy G5 is of limited applicability as it does not address the significant benefits provided by trees in terms of the visual landscape character, tree canopy moderation of extreme temperatures, rainfall absorption improving drainage, and the local biodiversity supported.* *Section 5.19 references Bristol City's tree replacement policy (based on tree diameter).*
30	Soil volume is driven by tree size. We should link removing hard surfacing, SuDS and tree planting opportunities.	*Those are appropriately dealt with in the policies on hardstandings, SuDS and trees.*
31	On biodiversity the national policy has shifted from no net loss to net gain. We can work with the tree officer to reword HW-C2.	*Policy (now HW-7) has been amended to refer to 'net gain'.*
	Flood risk and SuDS	
32	Para 4.45 should be corrected as Flood Risk Assessments are required for any development with flood risk.	*Changed (now para 5.36). Also removed the statement in the next para, which encouraged all planning applications to prepare and submit a flood risk assessment. Link to the government guidance to LPAs on flood risk assessments added in para 5.37.*
33	HW-C2 (Trees) – add: "to retrofit SuDS measures such as rain gardens, swales and SuDS tree pits into the public realm to improve localised flood risk, water quality, biodiversity and amenity".	*Added.*

34	Amend HW-C6 (Flood risk) – add: "in line with DMD Policy 59 and 60 or successor policy"; Remove "Urban" in "Sustainable Urban Drainage Systems"; Add "should be set back from watercourses".	*Changed.*
35	HW-C7 (SuDS) – again, remove "Urban".	*Changed.* *Also deleted the paragraph that requires applicants to demonstrate that SuDS features reduce the risk of surface water flooding, and not increase it, as the policy says the features are merely encouraged, i.e. they are voluntary.*
36	Where SuDS are provided within the public realm these should be an integral part of the green infrastructure and street network, and positively respond to the character of an area.	*Changed.*
	Local Green Space	
37	LGS6 – western part is not LOS; south-eastern corner not SoBINC; western corner being proposed for housing allocation through Call for Sites.	*Corrected.*
38	LGS8 – not a LOS, not a SoBINC; whole site being proposed for housing allocation through Call for Sites.	*Corrected (note: top triangle is SoBINC).*
39	Check that each site meets all the conditions of NPPF para 102 to become a LOS.	*Details provided in Appendix 4.*
40	Where LOS is proposed we should liaise with the landowners, especially for LGS8 and 9, which do not have public accessibility.	*The Duchy of Lancaster, as owner of LGS8, was consulted and opposes the designation, as it wishes the site to be released from the Green Belt and allocated for development. The Forum submitted extensive comments strongly opposing that proposal, contained in the draft Local Plan, in 2021. With respect to the Council's comment the Forum furthermore notes that public access is not a prerequisite for Local Green Space designation, and that the beautiful views over LGS8 from various parts of Hadley Wood are very important to many residents.* *The governors of the School and management of the golf club were consulted in the Reg. 14 public consultation.*
41	The table in the Appendix should be updated per above.	*Updated.*
	Housing	

42	HW-HD1 (New housing & mix) – replace "evidence of need in the local housing market area" with "evidence of housing need in the Local Housing Needs Assessment", and "Applications for development should not result in a net loss of one, two or three bedroom homes unless there is clear justification".	*Changed.*
43	HW-C5 (Small sites) – the definition of "small sites" is unclear.	*Defined, per the London Plan, as sites that are less than 0.25ha (= 2,500m²) in size.*
44	HW-C5 – most of the clauses are already part of standard development management considerations, and are not unique to this neighbourhood plan area.	*Not changed because, even though the points should be part of the standard planning considerations, it has not been our experience that they are consistently applied – 18-20 Waggon Road being a good example. As such we wish to add weight to the considerations. Comment to that effect added to the Policy (now HW-13). The policy also adds additional requirements with respect to infrastructure capacity (e.g. drainage) and the removal of certain PD rights.*
45	HW-C5 requires applications for small sites to consider the capacity of the local infrastructure, taking into account cumulative development already constructed or approved. As residential back gardens are considered 'brownfield' and developments are small in scale, the policy is out of keeping with London Plan Policy H2, and the extra requirement of cumulative impact on infrastructure would be disproportionate and unreasonable. We must provide evidence or delete this requirement.	*The comment is incorrect as residential gardens are not considered 'brownfield'. London Plan page 569 defines 'brownfield land' as Previously Developed Land. Page 588 defines the latter as excluding "land in built-up areas such as private residential gardens".* *Irrespective, in line with Thames Water's consultation feedback Policy HW-13 now states that Planning Officers must, when adjudicating applications, consider the infrastructure's ability to accommodate the incremental development.*
46	Some corrections are needed to reflect the latest legislative changes. For example, HW-HD2 clause 5 is a PD.	*Reviewed and changed.*
47	Some wording seeks to explain GPDO vs planning applications; this should not be in policies.	*Reviewed and changed.*

48	We should review the NP to update for the latest GPDO and Use Class changes effective 1 Sep 2020 etc.	*Reviewed and changed.*
	Developer Contributions	
49	HW-NC1 should be amended to add "in accordance with the Government's Community Infrastructure Regulations".	*Inserted ("Community Infrastructure Levy Regulations").*

Appendix D - Enfield Council 21 October 2022 feedback review

	Enfield comment	Action
4.3	add comment on Art. 4 Direction on the Conservation Areas.	*Added.*
4.4	add comment on Art. 4 Direction on the Conservation Areas.	*Not added as superfluous.*
4.4	doesn't mention the loss of architectural detail that is noted elsewhere.	*Added.*
4.5	add comment on Art. 4 Direction and PDs.	*Added reference to PDs.*
HW-1	crown roofs not supported for side extensions in Conservation Area.	*Not added as roofs on side extensions in the Conservation Area represent a very small sub-section of developments.*
4.6	add comment on Art. 4 Direction.	*Added.*
4.8	add comment on Art. 4 Direction.	*Added.*
HW-2	add comment on Art. 4 Direction.	*Not added as it is inappropriate to mention the Article 4 Direction relating to the Conservation Area in every policy. It is noted that the Council's DMD policies do not do that.*
4.11	add comment on Art. 4 Direction.	*Not added as not appropriate in this context.*
4.15	add comment on Art. 4 Direction.	*Not added as superfluous.*
4.19	add comment on Art. 4 Direction.	*Not added as not appropriate in this context.*
HW-3	add comment on Art. 4 Direction.	*Not added as not appropriate in this context.*
HW-4	parking standards not aligned with London Plan, but Enfield would be willing to consider increasing the max for 3 beds to 2 spaces.	*Removed "no less than" and the number of spaces now becomes the de facto standard. Merely increasing the maximum number of allowed spaces doesn't address the problem of the LPA approving developments with significantly fewer than the max permitted.*
4.34	insert "and architectural".	*Added.*
4.34	change to "of historic and architectural value".	*Not changed as the preceding sentence already has that same wording.*
4.34	insert "a designated heritage asset".	*Added.*
4.34	add comment on Art. 4 Direction.	*Not added as not appropriate in this context.*
4.35	insert "at the time of writing".	*Added*
4.35	insert "but may not be limited to".	*Not added as superfluous.*
4.36	insert "This list was correct at the time of publication but does not necessarily reflect the current situation".	*Added.*

4.37	add disclaimer as Local Heritage List will change over time.	*Added.*
HW-5	add comment on Art. 4 Direction.	*Added.*
Asp. HW(ii)	we should allow other non-designated heritage assets to be identified and benefit from policies.	*Added.*
Asp. HW(ii)	add uPVC isn't supported in the Conservation Area.	*Not added as that is not an Aspiration.*
5.1	note 14 July 2022 comment on NPPF position on release of Green Belt land in exceptional circumstances.	*That point was added in para 5.7 after Enfield's 14 July letter.*
5.5	note 14 July 2022 comment. The Forum's position is not aligned with the LBE emerging Local Plan. Commentary should be reviewed and moved to Appendix.	*Para 5.7 explicitly states that the NP supports the LPA's strategic policies, but adds that it is of the view that this does not require the release of Green Belt land in and around Hadley Wood. There is a good precedent NP for our position: https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2022/05/WSHSNP-Made-Version-single-pages-Nov19.pdf. Commentary on the Local Plan was already moved to Appendix 5.*
Asp. HW(iii)	note 14 July 2022 comment.	*The Forum believes the Aspiration is appropriate and there is no requirement for the NP to support Enfield's view on Green Belt land release.*
6.19	add comment on Art. 4 Direction.	*Added.*
6.26	add comment on Art. 4 Direction.	*Not added as the Art. 4 Direction does not remove PD rights for Class E (outbuildings).*
HW-12	add comment on Art. 4 Direction.	*Not added as not appropriate in this context.*
HW-12	better to replace 8. with wording that uPVC etc is not supported in the Conservation Area.	*Not changed as this policy and point do not relate specifically to the Conservation Area.*
Asp. HW(ii)	insert "including but not limited to".	*Added "Other non-designated heritage assets may be identified over time".*
App. 1	add comment on Art. 4 Direction.	*Added.*
Fig.47	add comment on Art. 4 Direction.	*Not added as comment is not appropriate – Figure 47 simply has the map showing where the Conservation Area is.*
App. 3	Add disclaimer that list changes over time.	*Added.*

Appendix E - Enfield Council letter dd 14 July 2022

ENFIELD Council

Please reply to:	Joyce Zhu
Email:	localplan@enfield.gov.uk
Phone:	
Textphone:	
Fax:	
My Ref:	Hadley Wood Neighbourhood Plan – pre-submission consultation – Reg-14
Your Ref:	
Date:	14 July 2022

Dear David

Thank you for the opportuntiy to comment on the draft Hadley Wood Neighbourhood Plan Regulation 14 document (June 2022). Please be advised that this letter represents the views of LBE (London borough of Enfield) planners, at officer level.

The Council is committed in providing on-going support advice and support throughout the neighbourhood planning process. In relation to the current stage of neighbourhood planning, the Council is also committed to providing formal written response to consultation.

General comments

It is recognised that huge amount of work that has gone into the preparation of the draft HWNP. Enormous effort has been put into the project management including funding application and commissioning evidence research. The draft Hadley Wood Neighbourhood Plan (HWNP) is well laid out and structured. It includes very detailed background research and contextual description of the Hadley Wood neighbourhood area, providing very comprehensive picture of Hadley Wood today, which informed the development of the Vision, Objectives, and Policies.

The Vision and Objectives are clear, and organically connect to and inform the formation of policies and aspirations. The document is supported by good evidence

Enfield Council

Civic Centre

Silver Street

Enfield

base in relation to heritage, conservation, flood risk information. The draft HWNP does not allocate any sites for development. In addition to the proposed policies, the draft HWNP also includes various Project and Aspirations Boxes that represent local aspirations but are beyond the delivery of planning.

The main focus of the Council's response will be on the conformity of the neighbourhood plan policies with the national and **existing** local planning framework, including the London Plan (March 2021), but guidance will also be provided to help the Forum to develop policies for them to be fit for purpose and deliverable.

Detailed comments

Green Belt

The draft HWNP recognised the contribution of the Green Belt in shaping the neighbourhood character i.e. its free-standing and semi-rural feature and well connected network of greenspace, woodland, farmland, trees and verges, streams and gardens. It is clear the permanence of the Green Belt should be protected.

It is noted the draft HWNP maintains a strong position in Green Belt protection in its Vision and in great detail in Chapter 4: The Character and Nature Environment. The draft HWNP proposes no amendments to the current Green Belt. No Policy Box has been proposed.

However, some of the supporting text and wording are at risk of being misinterpreting the national policy and opposing development that might be appropriate (subject to justifying 'Very Special Circumstances'). For example, Paragraph 4.50 states: '*The Neighbourhood Plan opposes any changes to the Green Belt boundaries and opposes development within the existing designated green belt (both within the Neighbourhood Plan boundary and in the wider area within the Boroughs of Enfield, Barnet and Hertsmere – see Figure 21)*.'

Aspiration Box HW(vi) is about the Green Belt and it states '*The Neighbourhood Form will continue to support the highest level of protection of this very important landscape*.'

It is concerning that the draft HWNP has selectively reviewed the current strategic policies on Green Belt in Vision and Chapter 4. The adopted London Plan (paragraph 2.3.1) states clearly that the Plan *'aims to accommodate the majority of London's growth within its boundaries without intruding on its Green Belt or other protected open spaces.'*

Whilst London Plan Policy G2 Part A focuses on the protection of the Green Belt from inappropriate development, Part B also provides that *'Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan'*. London Plan paragraph 8.2.1 further refers to the NPPF for processes and considerations should Green Belt boundaries need to be defined.

London Plan policy H1 Increasing Housing Supply and Table 4.1 sets specific ten-year target for net housing completions for individual boroughs. For Enfield, the 10-year net housing completion target is 12,460. The essence of the adopted London Plan is to plan the capital's ambitious future growth through 'good growth' and resist inappropriate development, and this should not be interpreted as the London Plan 'seeks to reinforce the Green Belt and, indeed, extend this as appropriate' as set out in the draft HWNP paragraph 4.52.

Again, the same selective review approach has been applied to Enfield's current adopted policies and emerging Local Plan in paragraphs 4.54 to 4.58, i.e. the draft HWNP is only picking up the protective Green Belt policies but overlooking the future direction of travel in accommodating good growth. The existing Core Strategy (2010) and Development Management Document (2014) are currently under review, and work on the new Enfield Local Plan is being undertaken. The Enfield Local Plan (ELP) Regulation 18 Consultation Draft (June 2021) has indicated the preferred option of some Green Belt releases in Strategic Policy SP SS1 Spatial Strategy, details followed in Strategic Policy SP PL8 Rural Enfield, Figure 3.9 (Rural Enfield placemaking vision), and, relevant to the Hadley Wood, Site Allocation S45 (Land between Camlet Way and Crescent Way).

National Planning Policy Framework (NPPF) and associated guidance states clearly that neighbourhood plan should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraphs 13 29 of the NPPF). In addition, paragraph 18 of the NPPF makes it clear that neighbourhood plans should only contain non-strategic policies.

It is acknowledged that the ELP is still at a relatively early stage, and the Regulation 18 Consultation draft (June 2021) does not currently form part of the development plan, nor does it carry material planning weight in decision making process. The Council is currently in the process of considering all representations and preparing for the next stage of plan making as set out in the Local Development Scheme (LDS). The issue of Green Belt review is part of the strategic issues to be considered

in the ELP in accordance with the NPPF and the London Plan. The Neighbourhood Plan should avoid being interpreted as opposing development that are appropriate or necessary to support local development.

For the benefit of avoiding doubt, future proof, and being in line with the NPPF, the London Plan (2021), and the existing Enfield Local Development Documents, it is therefore recommended that the wording of Vision and Chapter 4 when referring to the Green Belt protection be revised to state the protection of the Green Belt from 'inappropriate development'.

Character, Heritage and other Design related policies

The Plan includes a number of character, heritage and design related policies: HW-C1 (Character, Setting and Views), Policy HW-C3 (Boundary walls, Railings and Gates), HW-C4 (Paving of front gardens and off street parking), Policy HW-HD2 (High-Quality Built Environment), Policy HW-HD3 (Heritage Assets), and Policy HW-HD4 (Construction Activity). Significant amount of research and review has gone into defining the existing design and character of the neighbourhood area. In particular, it is noted the Forum commissioned AECOM to undertake a Heritage and Character Assessment on identifying key features and matters to be considered in the design of new development, and this evidence-based approach is recognised. These policies collectively support the draft Plan's Objectives and in general conformity to higher level policies on promoting high quality design and enhancing local distinctiveness and identity. The following paragraphs focus on technical improvement and further evidence.

For the benefit of avoiding doubt and misinterpretation, there should be a clear disclaimer that not all policy may apply in the conservation area.

Chapter 4 Character and Natural Environment of Hadley Wood incudes generic statements about local character but there are no specifics about what that comprises for example, building form, window detail, character of brick, ridge tiles etc.

HW-C1 (Character, Setting and Views) needs further clarification: Clause D should specify if it applies to extensions and replacements or to new build as well. The requirement for incorporating pitch roofs to all sides of the property is considered an overstepping regarding style outside of a conservation area. There are sections where policy is repeated or explained in higher level policies and should be removed. The requirements on development that are allowed under permitted developments cannot be enforced.

Draft policy HW-C3 (Boundary walls, Railings and Gates) first sentence should be reworded replacing 'strongly encouraged' with 'must be' to make a strong policy requirement. The second sentence can specify that solid front walls '(0.5m and higher)' will not be supported as lower level solid wall that allow for views of landscaped front gardens can be acceptable. This policy also includes two bullet points on whether planning permissions would be required within or outside of the Conservation Area, and these should not be in the policy wording because they are current planning law and not uniquely proposed in this neighbourhood area.

Draft policy HW-C4 (Paving of front gardens and off-street parking) is introducing higher parking standards for units with 3+beds in PTAL 0-1 locations. Paragraph 4.30 provides some explanation. However, the interpretation of '3 or more beds' to be 'equates to 2 or more bedrooms' is not the accepted interpretations i.e. "beds" is taken as "bedrooms". Should the draft HWNP consider standards to allow for higher level of parking provision there needs to be clear evidence to support this. The policy requirement for retaining at least 25% of the front garden to be soft landscaping can be improved by adding 'unless individual circumstances render that not appropriate'. The last paragraph in HW-C4 needs further checking because installation of dropped kerbs and cross-overs on an unclassified road do not usually require planning permission.

The divide between policies and guidance is not always clear which means it can be a confusing document to navigate. One example is the last clause in HW-HD2 (High-Quality Built Environment) requires planning applications *'to demonstrate how they comply with the Hadley Wood Design Guideline (in Appendix 1A)'*. Referring to guidance in policy as a requirement often creates confusion on what is requirement and what is good practice guidance.

It is advised that the draft HWNP should reflect on the AECOM Heritage Character Study in the body of the text or include it as an appendix as the AECOM Study includes good reference to existing conservation area policy or heritage significance.

The first part of Policy HW-HD3 (Heritage Assets) is repeating existing policy in NPPF and Enfield DM Policies, therefore it is unnecessary. The suggested potential additions to Local List in Chapter 5 (under Heritage Assets heading) paragraph 5.25 to 5.26 should be dealt with as part of the Local List Review, which follows a different process, therefore it is not appropriate for inclusion in the draft HWNP.

Some information about heritage assets is a bit confusing e.g. HW golf club and needs clarifying.

Policy HW-HD4 (Construction Activity) requires applicants for planning applications to provide Construction Management Plan in line with 'Hadley Wood Considerate Construction Guidelines' as set out in Appendix 4. The Forum should provide evidence and / or material consideration that Hadley Wood needs standards over and above other communities in the borough for such policy requirement to be introduced in this specific area.

Trees and biodiversity

The review of local characters and assets has highlighted the importance of trees, natural environment and biodiversity. This policy directly relates to the neighbourhood area's Vision and Objectives in supporting sustainable development and protecting natural environment. The following technical advice has been provided by the Council's Tree Officer with regard to draft policy HW-C2 (Trees, the natural environment and biodiversity):

- Risks to future tree growth should be explicit with SMART objectives for preservation and enhancement.
- A stronger evidence base on local trees and growth patterns will make a more robust tree policy. A phrase in urban forestry is 'what have we got? What do we want? How do we get there?'
- Consideration of designations in Defra's magic map, local wildlife trust data/objectives, biological records, use of the ancient tree inventory and community projects such as a 'big tree hunt' can be useful in locating and preserving key tree assets. Mapping these assets and risks should ideally form part of the policy.
- A neighbourhood wide TPO is unlikely to be possible without clear expediency and will prove unenforceable. Government policy advises against area TPO's for long term tree protection.
- Prescribing native trees, particularly in a small area such as Hadley Wood, is not good practice as a general policy. Species diversity should be promoted and is key to a sustainable urban forest. Introduced ornamental varieties may be more in keeping with the local urban landscape. Native species may be more appropriate when creating native woodland outside built up areas.
- The plan makes frequent comment about preserving mature trees where trees of all sizes should be considered. The urban forest is changing and dynamic

so that younger and middle-aged trees need consideration. Undervaluing younger/ smaller trees risks a lack of succession. Legal protection of mature trees, monitoring of GI cover overall and targeted planting based on need forms a more holistic, adaptive strategy. This monitoring would feed from the mapping exercise at comment 2.

- What areas are appropriate for what management? Similarly, removing trees in many cases may be appropriate, conversely retaining dead trees for wildlife has significant benefits. Again, adaptive management and control should be core to the policy and align with Enfield tree management.

- An aspiration to plant a 2 for 1 etc. can be problematic as larger scale tree removal often results in problems of insufficient space for new trees, with no real plan where trees go. The principles of biodiversity net gain, natural capital and the green infrastructure are more adaptable, where a specific plan is in place. The urban greening factors (policy G5 London Plan) can be developed for local needs. If a tree is removed to remove a problem, that shouldn't in-and-of-itself be the direct driver to plant more trees. A needs' driven policy rather than purely a numerical one is better.

- There is a physical relationship between soil volume and tree size, and volume will be a limiting factor to growth. Think Bonsai! Within public realm, soil volume and soil quality is critical to sustainable tree growth in hard landscape. There are some interesting points around the SUDS and de-paving in the draft, and it would be good to see more explicit links made and be cross-referenced as opportunities for adding value e.g. removing excess hard surfacing, adding soil in sufficient quantity and developing joint SUDS and tree planting opportunities as a single start-to-finish project, where more detail on soil volume is added.

- The national policy on biodiversity has shifted from no net-loss to biodiversity net gain (BNG). More guidance on biodiversity net gain can be found here: https://www.london.gov.uk/what-we-do/urban-greening-biodiversity-net-gain-design-guide and https://www.enfield.gov.uk/__data/assets/pdf_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf

The council's Tree Officer could provide further support in terms of rewording of HW-C2 and other element of evidence gap in relation to future Urban Forest Plan, should the Forum be interested please get in touch.

Flood Risk and Sustainable Drainage

In relation to flood risk and Sustainable Drainage, the amount of research and information gathering on flood risk and sustainable drainage is impressive. It highlights the local flood risk areas and bottlenecks of drainage system. The review of current flood management policies is comprehensive. This is generally supported. The following paragraphs focus on technical details.

Paragraph 4.45 of the draft HWNP should be corrected. The Council insists on a site-specific Flood Risk Assessment for any type of development subject to any type of flood risk (surface water, fluvial, groundwater, sewer etc.) including householder developments, change of uses and basements (see DMD policies 59 and 60). The council requires specific Groundwater FRAs for basement proposals. The Council also require all developments, householder, minor and major to provide a SuDS Strategy in line with the adopted Development Management Document Policy 61.

The reference to Sustainable Urban Drainage must be changed. SuDS stands for Sustainable Drainage NOT Sustainable Urban Drainage. Any reference to the Lead Local Flood Authority must be capitalised (not lead local flood authority). In short hand this is LLFA.

It is suggested that draft policy HW-C2 includes a further clause:- "to retrofit SuDS measures such as rain gardens, swales and SuDS tree pits into the public realm to improve localised flood risk, water quality, biodiversity and amenity."

The following amendments are suggested to improve **HW-C6 (***Flood risk)*:-

- Proposals for development will need to demonstrate that they will not increase the risk of flooding, for all types of flood risk, including fluvial, surface water, groundwater and sewer flood risk in line with DMD Policy 59 and 60 or successor policy.
- Applicants for all development, irrespective of size, are required to assess flood risk and utilise Sustainable ~~Urban~~ Drainage Systems (SuDS) in line with DMD Policy 61, in consultation with Enfield Council as the Lead Local Flood Authority.
- Wherever possible, proposals should be set back from watercourses, and are encouraged to support the restoration and or naturalisation of watercourses, as well as utilisation of natural flood management techniques to reduce flood risk.

Draft Policy **HW-C7 (***Sustainable urban drainage*) title should be changed to 'Sustainable ~~urban~~ drainage'. The following amendments are suggested to the last Para:-

Where it is proposed to provide SuDS within the public realm these should be designed as an integral part of the green infrastructure and street network, responding positively to the character of the area. Provision should reflect best practice, including that in emerging guidance from Enfield Council in the forthcoming SuDS Guide. All SuDS should be regularly inspected and properly maintained so that blockages do not exacerbate drainage problems.

Local Green Space

A thorough review of current Local Open Space and other policy designations has taken place and the evidence-based approach is generally supported. Draft **Policy HW-C8** proposes to designate a total of 11 sites to be Local Green space. Assessment of the above Local Green Space is included in its Appendix 5 – LGS8. Appendix 7 shows the current Local Plan designations on these sites.

The following errors need to be corrected in terms of current Local Plan designations:

- Proposed LGS 6:
    - Western part does not carry Local Open Space designation (b).
    - South East Corner also not Site of Borough Importance for Nature Conservation (c).
    - Western corner being proposed for housing allocation through Call for Sites
- Proposed LGS 8:
    - not a Local Open Space (b).
    - Not a Site of Borough Importance for Nature Conservation (c).
    - Whole site being proposed for housing allocation through Call for Sites

To be eligible for designation as Local Green Space, the space in question should meet all of the NPPF criteria in paragraph 102. This needs to be double checked.

Where Local Green Space designations are being considered, it is also advisable to engage with those controlling the land. This is particular the case for the proposed LGS8 and LGS9 where sites do not have public accessibility.

Recommendation:

The table (referred to as NPPF paragraph 201 Assessment) in Appendix 5 of the draft HWNP should be updated to reflect the correct Local Plan policy designations. The Forum is advised to engage with the landowners of the proposed LGS designations and share the details of NPPF Assessment. This is particular the case in relation to LS8 where it is not currently fully accessible to the public, not in recreational use, nor carrying existing Local Open Space designation.

Housing

Good research has been carried out on the subject of local housing market and housing mix. It is evident Hadley Wood has limited stock of smaller and affordable housing for people to downsize and for younger people with local connection to get on to the property ladder. Draft Policy HW-HD1 New housing development and mix is generally supported. The following minor amendments is suggested to improve it:-

a) 'evidence of need in the local housing market area' be replaced by 'evidence of housing need in the Local Housing Needs Assessment'

b) Applications for development should not result in a net loss of one, two or three bedroom homes unless there is clear justification.

In relation to draft policy HW-C5 (Small sites, including back gardens), the definition or threshold of 'small sites' is unclear. The Policy H2 of the London Plan on Small Sites requires all London boroughs to *'pro-actively support well designed new homes on small sites below 0.25 hectares in size through both planning decisions and plan-making'* in order to meet the capital's housing needs. Most of the policy clauses in HW-C5 relate to issues that are already part of standard development management considerations which do not appear to be unique to this specific neighbourhood area.

The last paragraph in draft policy HW-C5 requires applicants for development on small sites *'must also consider the capacity of all local infrastructure to accommodate incremental development, taking account of cumulative development already constructed or approved'*. Given that residential back gardens are classified as 'brownfield' and development in question would be relatively small in scale, in the absence of clear evidence base, it is felt that this policy appears to be out of keeping

to the London Plan policy H2, and the extra requirement on cumulative impact on infrastructure would be disproportionate and unreasonable. Clear evidence base should be provided to support this policy, or draft policy HW-C5 should be deleted.

General Permitted Development Order (GPDO) and Use Class

Much effort has gone into explaining the General Permitted Development Order and Use Class. Some technical corrections are necessary due to the latest legislative change on permitted development and use classes.

Planning permission is not needed when the existing and proposed uses fall within the same 'use class', or if GPDO allows the change of use. As a result, some of the draft policies would not be able to be delivered if they fall within permitted development rights. For example draft policy HW-HD2 (High Quality Built Environment) Clause 5 '*Additions to houses, such as security systems, outdoor lighting and air conditioning units should be visually inconspicuous',* because these usually fall within permitted development rights hence no need to obtain planning permissions.

It is also noted that some of the policies, for instance draft policy HWC2d on trees and HW C3 boundary walls, seem to be seeking to explain the GPDO and what needs planning permissions. It is unnecessary to reflect and respond to the unique characteristics and planning context of this neighbourhood area hence is advised to be removed from policy boxes to explanatory texts.

The Forum is advised to review the whole HWNP document and its appendices to update use classes and permitted development in line with the new legislative change. The General Permitted Development Order (GPDO) and Use Class has significantly changed as a result of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which came in to force on 1 September 2020. Some policies have been affected more than others (examples as below). Please note that these are examples therefore not an exhaustive list.

In relation to draft Policy HW-SF1 (*Social and community facilities)*, the referred D1 use class is now out of date. The 'old' D1 use has now superseded by Class E and Class FI under the new Use Classes and some uses have GPDO. Broadly speaking, the previous D1 uses are now classed to be:-

- clinics, health centres, creches, day nurseries and day centre - these are now under E Use Class, and permitted change of use could be allowed to C3 (dwellinghouse) and a mixed use within Class E (Commercial, Businesses

and Service) subject to limitation on floorspace, restrictions, conditions and details.

- Schools, non-residential education and training centres, museums, public libraries, public halls, exhibition halls, places of worship, law courts –these are now covered under FI Use Class (Learning and non-residential institutions), and some temporary changes of use could be permitted under GPDO.

Similarly Draft Policy HW-SF2 (*The Crescent West Local Parade)* needs to be updated. The 'old' A Uses fall into the following Use Classes:-

- Shop not more than 280sqm mostly selling essential goods, including food and at least 1km from another similar shop – now in Use Class F.2 (Local Community Uses) with no permitted change)
- Shop, Financial and professional services (not medical), Café or restaurant – now under Use Class E (Commercial, Businesses and Service) and permitted change of use allowed subject to limitation on floorspace, restrictions, conditions, and details.
- Pub or drinking establishment, Take away – Sui generis

Any reference to the old use class in this draft Plan should be reviewed and updated to reflect the latest change on Use Classes Order 1987 (as amended) and the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). Appendix 9 Permitted Development Guidance should also be updated.

Developer Contributions

It is good to see that the issue of infrastructure delivery has been well considered, and consultation evidently took place on local projects and priorities. With regards to draft Policy HW-NC1 Developer Contributions on neighbourhood portion, the relevant Regulation is 59A(3) – Duty to pass on CIL to Local Councils which notes the duty to pass on 25% of the relevant CIL. Regulation 59C sets out the Application of CIL passed on in accordance with 59A and that it should fund the provision, improvement, replacement, operation, or maintenance of infrastructure; or anything else that is concerned with addressing the demands that development places on an area.

It is advised that the draft Policy clarifies who will be monitoring and overseeing the allocation, spend and monitoring of CIL in the Hadley Wood NP area once adopted.

It is important that any spend that takes place is related to the listed priorities, is in line with the CIL Regulation 59C and addresses the demands of development within its areas. It is important the current priorities relate to the impact of development, and are appropriate in line with the regulations.

The following minor policy wording amendment has been suggested to improve Policy HW-NC1:-

Where development projects trigger the requirement for CIL payments and s106 agreements these will be made in accordance with Enfield Council's adopted guidance or any subsequent updates to this and in accordance with the Government's Community Infrastructure Regulations.

Summary

I hope these comments are helpful. The London borough of Enfield supports the draft HWNP Regulation 14 plan, subject to the comments made above. We look forward to working with you through the plan making process. Please contact my officers May Hope (may.hope@enfield.gov.uk) and Joyce Zhu (joyce.zhu@enfield.gov.uk) in the first instance.

Yours sincerely

May Hope (Plan Making Manager) signed on behalf of Vincent Lacovara (Head of Planning)

Enfield Council has launched a series of 14 e-newsletters covering a range of topics that provide residents with more frequent Council news and service updates. More than 40,000 people have already signed up, make sure you're one of them. You can register at **www.enfield.gov.uk/enewsletters**

Appendix F – Duchy of Lancaster letter dd 30 June 2022

The Neighbourhood Planning Forum Committee
c/o HWA Centre
1-7 Crescent East
Hadley Wood
EN4 0EL

CBRE, Inc.
Henrietta House
Henrietta Place
London
W1G 0NB

jonathan.stoddart@cbre.com

30th June 2022

By Email

Dear Sir/Madam

Draft Hadley Wood Neighbourhood Plan 2022-2039: Regulation 14 Consultation

Representations on behalf of the Duchy of Lancaster

CBRE Planning ('CBRE') is instructed by the Duchy of Lancaster to make representations to the Draft Hadley Wood Neighbourhood Plan's Regulation 14 consultation. Following publication of a previous draft in May 2020, an updated document has been released for consultation until 3rd July 2022.

The Duchy of Lancaster own a 11.05ha site located between Camlet Way and Crescent Way, to the north west of the built up area of Hadley Wood. A more detailed description of the site is provided below. These representations are submitted in respect of the Duchy's aspirations as a key landowner within the neighbourhood plan area.

The Duchy of Lancaster welcomes the opportunity to work with the Hadley Wood Neighbourhood Forum and to be involved in the Neighbourhood Plan's preparation process. The online feedback form consists of a number of statements related to each policy area, which can be answered on a scale of strongly agree to strongly disagree. As the nature of the scale only allows either opposition or agreement, this letter provides further explanation and detail of our responses. We hope this is of assistance and acceptable to help inform the planning policy approach.

Duchy of Lancaster

The Duchy of Lancaster is the private estate of the sovereign and consists of a unique portfolio of land, property and assets that are held in a trust. The Duchy of Lancaster aims to deliver sustainable and long-term growth from its portfolio. The Duchy of Lancaster is the freehold owner of a Site located between Camlet Way and Crescent Way, to the north of the built up area of Hadley Wood.

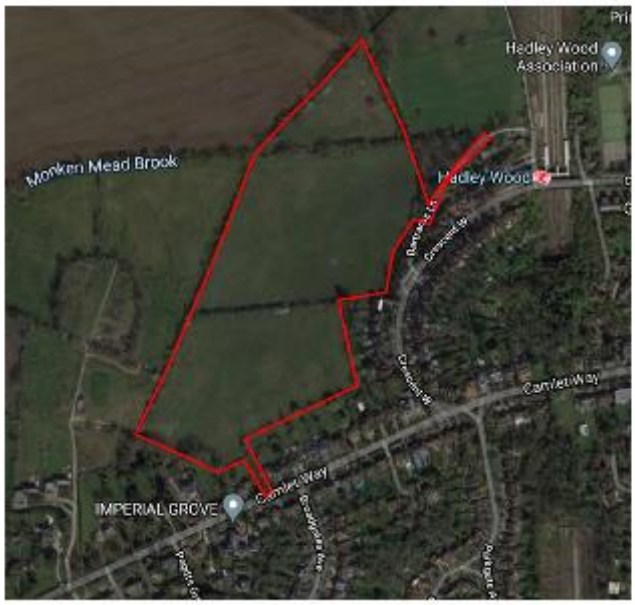
Site Description

The Site is located to the northwest of Camlet Way and Crescent West approximately 100m to the west of Hadley Wood Station. The site consists of 11.05ha of pasture/grazing land, including a brook, which runs east-west through the northern portion of the site.

The site is located adjacent to the existing neighbourhood of Hadley Wood, to the rear of the predominately large, detached properties along Camlet Way and Crescent West. There is a tree line to the north east boundary of the site, separating the site from the Bartrams Lane. Further to the south, the site directly adjoins the rear gardens of the residential properties along Crescent West and Camlet Way.

The site is currently accessed to the south, in between properties 83 and 79 Camlet Way, and to the north, from Bartrams Lane and a pedestrian footpath which runs adjacent to Crescent West. There is both pedestrian and vehicular access to the site.

The site plan below shows the general site extent and location.



The site is subject to the following planning policy designations with Enfield's adopted Local Plan:

- The site is within an Area of Special Character.
- The site is within the Green Belt.
- Parts of the north and northwest of the site are within 'APA2: Enfield Chase and Camlet Moat' Archaeological Priority Area.
- The majority of the site is within Flood Zone 1, and a small portion to the north is within Flood Zone 3.
- The northern part of the site is situated within a Site of Borough Importance for Nature Conservation (SINC).

The site is identified as Site Allocation SA45 within Enfield's Draft Local Plan 2019-2039. The draft allocation indicates that the site could provide approximately 160 new homes.

The site is located immediately adjacent to Hadley Wood Conservation Area, which extends to the east of the site to cover Crescent West and East. There are three Grade II listed buildings to the north of the site along Camlet Way (83 Camlet Way and Attached Wall, 87 Camlet Way and Attached Wall and Pegasus, 81 and 91 Camlet Way). There are also a number of other heritage assets within the wider surrounding area including Wrotham Park Registered Park and Garden and the Battle of Barnet Registered Battlefield. The Monken Hadley Conservation Area, which is within the London Borough of Barnet, abuts the western boundary of the site.

The site is approximately 100m to the west of Hadley Wood Station. The village of Hadley Wood is identified within the adopted Local Plan to have a Local Shopping Parade. Hadley Wood Primary School is approximately 300m to the east of the site.

Representations to the Draft Neighbourhood Plan

Vision

The Duchy support the reference to future development within Hadley Wood following the principles of 'good growth' and sustainable development.

The Vision sets out that "*the Green Belt, other green spaces, trees and vegetated gardens, so important to biodiversity, wellbeing, drainage and air quality, will be given stronger protection*". Whilst the Dutchy does not object to the principle of protecting various green spaces, it is important the policies within this document do not contradict the requirements of the Local Plan, particularly in respect of green belt land.

Enfield's Core Strategy Policy 33 confirms "*the Council will continue to protect and enhance Enfield's green belt. Proposals for changes to the detailed boundary at the local level will brought forward as part of the Development Management Document subject to criteria set out in Planning Policy Guidance 2 and reflecting more local priorities*". This demonstrates that the adopted Local Plan allows for potential amendments to the Green Belt boundary through a plan-led process. Furthermore, the spatial strategy within Enfield's Draft Local Plan follows a 'Medium Growth Option', which allows for release of Green Belt land. There are a number of draft allocations within this document, including the Duchy's site between Camlet Way and Crescent West, which propose development within the Green Belt.

As a general comment, it is considered that the Neighbourhood Plan should not contradict the spatial priorities set out at a local level by giving stronger protection to the Green Belt. The protection afforded to the Green Belt should be in line with the policy requirements at national, regional and local level and relevant material considerations. As currently drafted the Neighbourhood Plan does not contain a specific policy in respect of the green belt therefore the reference to "Green Belt" within this vision is not considered appropriate. The vision should read "*~~the Green Belt, other~~ green spaces, trees and vegetated gardens, so important to biodiversity, wellbeing, drainage and air quality, will be given ~~stronger~~ protection*".

Objective 01: Green Infrastructure and Natural Environment

Objective 01 states that "*the Neighbourhood Plan does not propose any amendments to the Green Belt*". For the reasons set out below, the Dutchy request that this reference is removed.

The NPPF (2021) states that "*strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans*". Therefore whilst the neighbourhood plan has a role in defining the detail associated with Green Belt boundary amends, it is the Enfield's Local Plan that should determine green belt release at a strategic level i.e. the location and extent.

As set out above, the adopted Core Strategy and Development Management documents allow for potential Green Belt release. The spatial strategy within Enfield's Draft Local Plan follows a 'Medium Growth Option', which also allows for release of Green Belt land. The Duchy's site is identified as Site Allocation SA45 within the Draft Local Plan, which indicates the site could be released from the Green Belt to provide approximately 160 new homes. Whilst is it recognised the Draft Local Plan is not yet adopted, as it progresses through the adoption process towards examination it will gain weight and will be a material consideration in relevant planning decisions. It is therefore requested that the above statement is removed to account for the site's potential release from the Green Belt particularly as the Draft Local Plan gains weight.

Policy HW-C1: Character, setting and views

The policy sets out that "*proposals for development in the Neighbourhood Plan area, including new build, extension or replacement buildings, will be required to maintain the characteristic views and setting of Hadley Wood*". Whilst the Dutchy does not object to the principle of this and recognises the importance of maintaining the key views and setting of Hadley Wood, it is important to ensure that the policy is worded

flexibly enough so that is does not prevent or preclude development within the neighbourhood plan area. This is important to ensure the plan contributes to achieving 'good growth' and sustainable development, as set out within the plan's vision.

If the Camlet Way site were to be developed for housing in line with the draft allocation, the Dutchy would seek to ensure that development is undertaken in a way that is consistent with the wider townscape pattern and sensitive to the key views from the Conservation Area. However to ensure sufficient flexibility, it is considered that the policy should be worded as follows:

"*Proposals for development in the Neighbourhood Plan area, including new build, extension or replacement buildings, will be required to* ***demonstrate how development is sensitive to*** ~~*maintain*~~ *the characteristic views and setting of Hadley Wood* ***in line with the following criteria***".

Aspiration HW(vi): The Green Belt

The NPPF (2021) states that "*strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans*". Therefore whilst the neighbourhood plan has a role in defining the detail associated with Green Belt boundary amends, it Enfield's Local Plan that should determine green belt release at a strategic level i.e. the location and extent.

As set out above, both adopted and emerging local plan policy acknowledge potential changes to green belt boundaries. The Duchy's site is identified as Site Allocation SA45 within the Draft Local Plan, which indicates the site could be released from the Green Belt to provide approximately 160 new homes.

On this basis, the text at 4.50 – 4.85 along with 'Aspiration HW(vi): The Green Belt' is not considered appropriate and should be removed. The neighbourhood plan should be written in conformity with local policy, which does not oppose changes to Green Belt boundaries. This will be particularly important as emerging policy gains weight and is eventually adopted. If the text at 4.50- 4.85 is to remain, it is requested the plan at least acknowledge this draft allocation and ensure the text is worded flexibly enough to account for the site's potential release as the Draft Local Plan.

Policy HW-C8: Local Green Space Designations

The Duchy's site between Camlet Way and Crescent West is located across Local Green Space designations 6 (Hadley Wood Association land to the west of the railway) and 8 (The fields to the north of Camlet Way and West of Crescent West).

The NPPF states that "*designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services*". Designating all green spaces within the neighbourhood plan area as Local Green Space is not considered a sustainable form of development.

The London Plan's 10 year housing target for net housing completions in Enfield is 12,460, equating to 1,246 homes per year. The Enfield Local Housing Needs Assessment (November 2020) sets out objectively assessed need requirement at 1,744 dwellings per annum. This would equate to an overall 17,440 homes over a 10 year period and 34,880 over a 20 year period. Therefore, there is significant need for new homes in Enfield over the next 20 years. Enfield have recently released updated 5 year housing land supply figures. They can only demonstrate a 3.38 year housing supply in the period between 2021/22-2025/26. As a result of this, the Council is required to add a 20% buffer to it's 5 year target. This means the Council are now required to deliver 7,476 homes in the next 5 years, based on the London Plan housing target of 1,246 homes per annum plus 20% buffer.

Therefore, both in the short and long term there is a significant need for new homes in Enfield. It is considered that this will inevitably require greater intensification of brownfield land and existing urban areas, as well as additional Green Belt release than is currently proposed. The Duchy's site between Camlet

Way and Crescent West is a critical component of meeting the development needs of the borough over the plan period, and therefore, the Duchy is promoting the site for allocation for residential development and it's release from the Green Belt. It is not considered appropriate to designate this site as Local Green Space, in light of its draft housing allocation and borough-wide pressure to deliver new homes.

The NPPF sets out that the Local Green Space designation should only be used where the green space is:

a) In reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land

In respect of point a, whilst the Duchy's land is in close proximity to the community, it does not serve the community in a practical manner. The land owned by the Duchy in both designations (6 and 8) is not publicly accessible and is operated as pasture/grazing land. Enfield's Draft Local Plan allocates the site for housing development, and this should be reflected in the tests set out within Appendix 5 (Local Green Space Designations).

The second criteria requires the piece of land to be demonstrably special to the local community. There is no demonstrable evidence provided to indicate that the local community consider the Duchy's land as 'special' in accordance with national policy. Appendix 5 of the Draft Neighbourhood Plan sets out a series of criteria, although it is not clear how each have been ranked and decided upon. Notwithstanding this, the Duchy have assessed their land in designations 6 and 8 against the criteria below.

- **Beauty:** The site consists of 11.05ha of pasture/grazing land. Whilst the Conservation Area Appraisal refers to a key view from Crescent West out across the site, the current view is far more restricted and glimpsed in nature, owing to the maturing planting which marks the edge of Crescent West. Furthermore, the descending nature of the topography and hedgerows within the Site limit wider ranging views across the Site as a whole. This limits the visual significance of the site for the local community.

- **History**: Whilst there are conservation areas adjacent to the site, and listed buildings in close proximity, the land itself has historically formed part of the rural countryside. An aerial photograph dating 1999 shows land to the west of the site partly occupied by a series of outbuildings. It is considered that the site itself is limited in terms of historical significance.

- **Recreation:** The land is not used by the local community for recreation or in a practical manner. The site has no existing recreational value.

- **Tranquility:** Whilst it is acknowledged there is some degree of tranquility, the land is private, operational farmland and so this is limited.

- **Wildlife:** An Ecology Assessment prepared by Ecology Solutions on behalf of the Dutchy notes that the grassland across the site hasn't been appropriately managed, particularly in respect of the SINC land, and the value of the grassland will continue to decline. The initial site survey found no evidence of protected species or badgers and no bat roosts were recorded. As such, there is no evidence to suggest any ecological constraints or protected wildlife on the site.

In respect of the final point, the Duchy consider their site to be an extensive tract of land. The Duchy's land spreads across two Local Open Space designations, it is private farmland and for these reasons is not considered local in character.

Overall, the Duchy do not consider there is sufficient compliance with the policy tests at paragraph 102 of the NPPF to designate their land as Local Green Space. It is requested that the Duchy's land is removed from designations 6 and 8, as it is not considered appropriate for Local Open Space designation.

General Comment

The text within the Aspiration boxes cannot be delivered through planning policy. Whilst it provides helpful background to the reasoning behind some of the draft policies, it is not considered appropriate to include within a formal policy document. We would therefore request this is removed if this plan were to be adopted.

Summary

As a key landowner in the neighbourhood plan area, the Duchy of Lancaster welcomes the opportunity to submit representations to the Draft Hadley Wood Neighbourhood Plan. Whilst the Duchy of Lancaster broadly support the vision and objectives of the Plan, there are concerns regarding some of the specific policies with regard to compliance with the NPPF, London and Local Plan. Specifically, the Duchy of Lancaster is concerned about the designation of their site at between Camlet Way and Crescent West as Local Green Space. It is not considered that the Duchy's land, which spans designations 6 and 8, complies with the criteria set out within paragraph 102 of the NPPF.

Notwithstanding the above, the Duchy support the overall vision of the plan to promote 'good growth' in Hadley Wood and would welcome working with the Neighbourhood Planning Forum on future iterations of the document.

I trust that the above is helpful and we would request we be informed on the draft Neighbourhood Plan process and milestones, including any chances made to the document as a result of this consultation. Please do not hesitate to contact me or my colleague Charlotte Everard (charlotte.everard@cbre.com) if you have any queries or comments.

Yours faithfully

Jon Stoddart MRTPI | Executive Director
CBRE Ltd | UK Development – Planning

Cc: Duchy of Lancaster
Charlotte Everard MRTPI | Senior Planner

Appendix G – Thames Water letter dd 24 June 2022

Sent by email to: hadleywoodnp@gmail.com

thameswaterplanningpolicy@thameswater.co.uk

24th June 2022

Enfield – Hadley Wood draft Neighbourhood Plan 2022-2039

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above. Thames Water is the statutory water and sewerage undertaker for the Enfield Borough and hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the Hadley Wood Neighbourhood Plan:

Infrastructure Policies – Comments on Water and Wastewater/Sewerage Infrastructure

Thames Water consider that there should be a separate policy covering water and wastewater/sewerage infrastructure in the Neighbourhood Plan.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: "*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for… infrastructure for waste management, water supply, wastewater…*"

Paragraph 11 states: "*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*
a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"

Paragraph 28 relates to non-strategic policies and states: "*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure…*"

Paragraph 26 of the revised NPPF goes on to state: *"Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary…."*

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with

development needs. The introduction to this section also sets out that *"Adequate water and wastewater infrastructure is needed to support sustainable development"* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity

In light of the above comments and Government guidance we consider that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

"Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."

"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

Water Efficiency/Sustainable Design

The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the

mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
https://www.thameswater.co.uk/Be-water-smart

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Proposed policy text:
"Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."

Comments in Relation to Flood Risk and Sustainable Drainage Systems

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the

sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan "***It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.***"

Site Allocations

There are no site allocations for us to comment upon in the draft Neighbourhood Plan, however reference is made to potential developments.

The level of information contained in the draft Neighbourhood Plan does not enable Thames Water to make an assessment of the impact the proposed development will have on the water/sewerage networks and treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity

It should be noted that in the event of an upgrade to our network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the number above if you have any queries.

Yours faithfully

Thames Water Utilities Ltd

Appendix H – Comparison of final policies vs Reg. 14 consultation policies

Updated Policy in Submission documents	Policy in Reg. 14 Consultation documents
Policy HW-1: Setting, character and views Proposals for development in the Neighbourhood Plan area, including new build, extension or replacement buildings, will be required to demonstrate how development is sensitive to the characteristic views and setting of Hadley Wood and must be in line with the following criteria and: a) avoid creating a 'terracing' effect where buildings are extended to the edge of the plot boundary. b) retain a minimum distance of 1m from the boundary with the adjoining building, with the distance increasing in proportion to the width of the property, width of the site, and the scale of the development ([1]). c) where the bulk and scale of a property is greater than before the works, soften the impact by: i. tiering development, so upper floors are not the full width of the ground floor. ii. Having pitch roofs to the sides or crown roofs. iii. designing extensions that they are subsidiary to the host property. d) ensure that dormers are modest in number, size and proportion.	**Policy HW-C1: Character, setting and views** Proposals for development in the Neighbourhood Plan area, including new build, extension or replacement buildings, will be required to maintain the characteristic views and setting of Hadley Wood. a) Proposals should not block nor significantly infill gaps between buildings. b) Proposals will avoid creating a 'terracing' effect where buildings are extended to the edge of the plot boundary. c) Proposals will retain a minimum distance of 1m from the boundary with the adjoining building, with the distance increasing in proportion to the width of the property. d) Where a development increases the bulk and scale of a property, the design will soften the impact by: i. Tiering development so upper floors are not the full width of the ground floor. ii. Incorporating pitch roofs to all sides of the property. iii. Designing extensions that are subsidiary to the existing property. iv. Dormers to be modest in size and proportion. e) Even where a ground floor extension is within the dimensions allowed under Permitted Development, applicants are strongly encouraged to respect the guidelines for larger developments, particularly spacing to the boundary and building angles to neighbouring properties. f) Permitted development schemes are expected to follow best practice guidance, as outlined in Appendix 9.

Policy HW-2: Front boundary walls, railings and gates

Front boundary treatments require planning approval if the height exceeds 1m. Whenever new or replacement walls, gates and/or railings are installed:

a) These must be of a low level and allow for views of landscaped gardens behind and comply with Enfield Policy DMD 8, which states that the height should not normally exceed 1m.

b) Solid front walls of 0.5m and higher will not be supported. Boundary treatments that are higher than 0.5m must be constructed of railings or similar, but can incorporate a solid lower section.

c) Railings and gates taller than 1m are not considered 'in character' throughout the majority of streets in Hadley Wood.

d) To ensure safety of pedestrians and road users gates must be set back from the edge of the pavement and carriageway, and incorporate visibility splays (Enfield Council's Technical Standards refer[1]).

All front boundary treatments must, as far as possible, retain the open character of the street scene, hedges, trees and other natural features. They must also avoid damaging or destroying tree roots.

Policy HW-C3: Boundary walls, railings and gates

Where boundary walls or railings are proposed, they are strongly encouraged to be of a low level and allow for views of landscaped gardens behind.

Solid front walls will not be supported. Tall railings and gates are not considered 'in character' throughout the majority of streets in Hadley Wood.

- Within the Conservation Area, planning permission will be required for erection of all boundary walls, including associated gate posts and pillars, irrespective of their height. Where original boundary walls exist within the Conservation Area they should be retained or reinstated wherever possible.
- Outside of the Conservation Area planning permission will be required for any part of any front boundary wall or railing exceeding 1metre in height.

All boundary walls (whether inside the Conservation Area or not) should, as far as possible, retain the open character of the street scene, mature hedges, trees and other natural features. They should avoid damaging or destroying tree roots.

[1] https://governance.enfield.gov.uk/documents/s39945/ENV12134Appendix1.pdf

Policy HW-3: Paving of front gardens

Front gardens are of immense importance to the setting and character of a locality, reduce flooding risk, support biodiversity and help mitigate the effects of climate change.

All new and replacement hardstandings must:

1. Maximise the retained area of lawn and vegetation. A minimum of 25% of the front garden retained as soft landscaping, i.e. unpaved (unless individual circumstances render that not appropriate). Homeowners are strongly encouraged to retain a greater part, of up to 50%.
2. Incorporate permeable or porous materials that reflect the character of the area.
3. Incorporate Sustainable Drainage Systems (SuDS).
4. Not directly run-off straight into the drainage system (to avoid adding to flood risk and to ensure pollutants do not enter rivers).

Until such time that the GPDO 2015, as amended, includes adequate protections of front gardens the default approval of any application for new build, extension to existing dwelling or new/replacement front boundary treatment is to add a condition that removes the Part 1, Class F Permitted Development rights ('Hard Surfaces'), unless there are other safeguards to ensure that a minimum of 25% of the area to the front of the dwelling will be kept as vegetated garden space.

Policy HW-C4: Paving of front gardens and off-street parking

All new hard standings (for new homes, extensions and refurbishments) should:

- Incorporate natural permeable or porous materials that reflect the character of the area,
- Seek to maximise the retained area of lawn and vegetation,
- Incorporate Sustainable Urban Drainage Schemes (SuDS),
- Not direct run-off straight into the drainage system (both to avoid adding to flood risk and to ensure pollutants do not enter the main river system).
- Include new planting of indigenous tree and shrub species.
- Ensure that a minimum of 25% of the front garden is retained as soft landscaping, i.e. unpaved.
- In line with the footnote to Table 10.3 of the London Plan, apply appropriate higher parking standards for units with 3+ beds in PTAL 0-1 locations

Within the Conservation Area, planning permission is required to create any hard standing within the curtilage of the property.

Elsewhere in the Designated Neighbourhood Plan Area, planning permission is required to create any hard standing in excess of five square metres in area unless the hard surface is made of porous materials, or provision is made to direct run-off water from the hard surface to a permeable or porous area or surface within the curtilage of the dwellinghouse.

Where necessary to gain vehicular access to allow off-street parking, planning permission must be sought for the installation of dropped kerbs and cross-overs. These will only be supported where appropriate on-site drainage is provided, using permeable surfaces, and where surface run-off rates do not increase those currently experienced.

Policy HW-4: Off-street parking

Notwithstanding the need to retain part of the front gardens as green space, adequate off-street parking should be provided to avoid adverse impacts, especially on highway safety. Plot sizes in the Neighbourhood Plan area allow both to be accommodated.

Where the number of housing units on a site is increased by way of apartments:

- For developments located on the NP area's main access roads, being Cockfosters Road, Beech Hill, Camlet Way and Waggon Road, the number of on-site parking spaces shall be:
  - 1.5 per 1 - 2 bedroom unit;
  - 2 spaces per 3+ bedroom unit; and
  - an appropriate number of additional on-site spaces for visitors and deliveries/maintenance workers.
- For developments on other roads the number of on-site parking spaces shall be 1.5 per 1+ bedroom unit.

Policy HW-5: Heritage Assets

1. Planning applications within the Hadley Wood Conservation Area, as well as those affecting its setting, must have regard to the relevant Conservation Area Appraisal(s) and Management Proposals.
2. Development (both existing properties and new builds) should take advantage of opportunities to enhance the Conservation Area by protecting and, where appropriate, restoring original architectural features, including walls, windows, doors, etc that would make a positive contribution to the Conservation Area.

Policy HW-HD3: Heritage Assets

Planning applications within the Hadley Wood Conservation Area and affecting its setting must have regard to the Conservation Area Appraisal and Management Proposals and should set out how they will conserve and enhance the Conservation Area and its setting.

Applications for development to or adjacent to non-designated Heritage assets at Camlet Way (nos 39, 42, 43 and 47) and the former Beech Hill Park Entrance Lodge should conserve and enhance the non-designated heritage assets and their setting.

3. The same care – to protect and enhance – must be taken with other, non-statutory, heritage assets, such as those on Enfield Council's Local Heritage List and the buildings detailed in Appendix 3. It is noted that national legislation, the planning framework and Enfield's Article 4 Direction may result in certain Neighbourhood Plan policies not applying to the Conservation Area.	

Policy HW-6: Local Green Space Designations The following sites are to be designated as Local Green Spaces (LGS), as delineated on the maps in Figure 20: **LGS comprising local open spaces and wildlife corridors:** 1. Hadley Wood Association land to the east of the railway line. 2. The adjoining open space within Hadley Wood Primary School. 3. Land above the south tunnel, north and south of Camlet Way. 4. Open Space adjacent to St Paul's Church. 5. The railway cuttings, either side of the station, and extending into Monken Hadley Common. **LGS comprising open space within the Green Belt:** 6. Hadley Wood Association land to the west of the railway. 7. Hadley Wood Association land over the north tunnel. 8. The fields to the north of Camlet Way and West of Crescent West (adjacent to the HWA land). * 9. Hadley Wood Golf Club. 10. Covert Way Nature Reserve. 11. Sewits Hill (between Covert Way, the Golf Club and Monken Hadley Common).	**Policy HW-C8: Local Green Space Designations** The following are designated as Local Green Spaces (LGS), as delineated on the maps in **Error! Reference source not found.**: **LGS comprising local open spaces and wildlife corridors:** 1. Hadley Wood Association land to the east of the railway line. 2. The adjoining open space within Hadley Wood Primary School. 3. Land above the south tunnel, north and south of Camlet Way. 4. Open Space adjacent to St Paul's Church. 5. The railway cuttings, either side of the station, and extending into Monken Hadley Common. **LGS comprising open space within the Green Belt:** 6. Hadley Wood Association land to the west of the railway. 7. Hadley Wood Association land over the north tunnel. 8. The fields to the north of Camlet Way and West of Crescent West (adjacent to the HWA land). 9. Hadley Wood Golf Club. 10. Covert Way Nature Reserve. 11. Sewits Hill (between Covert Way, the Golf Club and Monken Hadley Common). Planning applications for development on the Local Green Spaces Designations will not be permitted unless, and in exceptional circumstances, it can be demonstrated that the proposed use performs a supplementary and supporting function to the Green Space.

Planning applications for development on the Local Green Space designations will not be permitted unless, and in exceptional circumstances, it can be demonstrated that the proposed use performs a supplementary and supporting function to the Green Space. * The NP assumes this site is not released from the Green Belt and allocated or proposed for development in the approved Local Plan 2019-2039, following robust representations to the draft Local Plan from the Mayor of London, local community groups and many residents.	

Policy HW-7: Trees, the natural environment and biodiversity Reflecting the importance of the natural environment: 1. Development proposals must secure a minimum net biodiversity net gain of 10% ([1]). This is expected to be provided on-site; where this is shown to be not possible it should be provided as close as possible to the development site. 2. Development must maximise the retention of existing trees and grass verges to the extent possible, incorporating these into proposed development. Sufficient space must be allowed above and below ground to prevent damage to root systems and facilitate further tree growth. 3. Any trees that are lost as a result of development must be replaced on a ratio of at least 2:1, preferably on-site or, if not possible, at a nearby alternative site in Hadley Wood. Lost trees include those that were removed in the three years prior to the development. 4. Where landscaping is to be provided, design should help create distinctive places.	**Policy HW-C2: Trees, the natural environment and biodiversity** Proposals for change and development will be expected to result in no net-loss of biodiversity in Hadley Wood. In particular, development should: a) Maximise the retention of existing mature trees, associated landscaping and grass verges wherever possible, and incorporate these into the proposed development. b) Allow sufficient space above and below ground to prevent damage to root systems and to facilitate future tree growth. c) Any trees that would be lost as a result of development will be replaced on a ratio of at least 2:1, preferably on-site or, if not possible, at an alternative site in Hadley Wood. New and replacement trees should be of a species native to Hadley Wood and maximise tree canopy cover. d) All trees in the conservation area are statutorily protected, as are those covered by specific Tree Protection Orders. Any pruning of or removal of these trees will be subject to permission from Enfield Council.

5. Where there is genuine unavoidable loss or damage to habitats, sites or features because of demonstrated exceptional circumstances, mitigation and compensation is required. 6. SuDS measures, such as rain gardens, swales and SuDS tree pits into the public realm must be retrofitted to improve localized flood risk, water quality, biodiversity and amenity. Where appropriate the above will be reflected by way of a condition to the approval of planning applications.	

Policy HW-8: Flood risk Proposals for development must: 1. demonstrate that they will not increase of any type of flood risk, including fluvial, surface water, groundwater and sewer flood risk, in line with DMD Policy 59 and 60 or successor policy. 2. irrespective of size, assess flood risk and utilise Sustainable Drainage Systems (SuDS) in line with DMD Policy 61 or successor policy, in consultation with Enfield Council as Lead Local Flood Authority. 3. wherever possible, be set back from watercourses and support the restoration and/or naturalisation of watercourses, as well as use natural flood management techniques to reduce flood risk.	**Policy HW-C6: Flood risk** Proposals for development will need to demonstrate that they will not increase the risk of flooding, for all types of flood risk, including fluvial, surface water, groundwater and sewer flood risk. Applicants for all development, irrespective of size, are required to assess flood risk and utilise Sustainable Urban Drainage Systems (SuDS) in line with DMD Policy 61, in consultation with Enfield Council as lead local flood authority. Wherever possible, proposals are encouraged to support the restoration and or naturalisation of watercourses, as well as utilisation of natural flood management techniques to reduce flood risk.

Policy HW-9: Sustainable drainage	Policy HW-C7: Sustainable urban drainage
Proposals for development in Hadley Wood are encouraged to include one or more of the following sustainable drainage features: • Rain gardens (including swales and tree pits). • Permeable and porous areas or surfaces. • Green roofs. • Ponds or bioretention basins. Where it is proposed to provide SuDS within the public realm these should be designed as an integral part of the green infrastructure and street network, responding positively to the character of the area. Provision should reflect best practice, including that in emerging guidance from Enfield Council in the forthcoming SuDS Guide (Sustainable drainage systems | Enfield Council). All SuDS should be regularly inspected and properly maintained so that blockages do not exacerbate drainage problems. Maintenance arrangements must be included at the proposal stage.	Proposals for development in Hadley Wood will be encouraged to include one or more of the following sustainable drainage features: • Rain gardens (including swales and tree pits). • Permeable and porous areas or surfaces. • Green roofs. • Ponds or bioretention basins. Applicants will need to demonstrate that these features manage the risk of surface water flooding and do not increase the risks, either within the boundary of the proposed development or elsewhere in Hadley Wood. Where it is proposed to provide SuDS within the public realm these should be designed as an integral part of the green infrastructure and street network, responding positively to the character of the area. Provision should reflect best practice, including that in emerging guidance from Enfield Council in the forthcoming SuDS Sourcebook. All SuDS should be regularly inspected and properly maintained so that blockages do not exacerbate drainage problems.

Policy HW-10: New housing development and mix	Policy HW-HD1: New housing development and mix
New housing in the built-up area of Hadley Wood should: 1. Provide a mix of housing types, sizes and tenures consistent with the most up-to-date evidence of need in the Local Housing Needs Assessment, including the need for three and four bedroom family homes. 2. Provide the maximum viable amount of affordable housing per the national requirements/guidance.	New housing in the built-up area of Hadley Wood should: a) Provide a mix of housing types, sizes and tenures consistent with the most up-to-date evidence of need in the local housing market area. Encouragement is given to development proposals that provide opportunities for people looking to downsize as well as those looking for their first home. b) Subject to national thresholds for the provision of affordable housing, provide the maximum viable amount of affordable housing

3. Design affordable housing such that it is tenure-blind and thus of equal quality in design and materials to the market element in the proposal. 4. Provide more downsizing opportunities. 5. Be sympathetic to the character and setting of the area. Applications should not result in a net loss of one, two or three bedroom homes unless there is clear justification.	c) Design affordable housing such that it is tenure blind and thus of an equal quality in terms of its design and use of materials compared to the market element and should be integrated into the overall proposal. Applications for development should not result in a loss of one, two or three-bedroom homes.

Policy HW-11: Self-contained apartments

Building on existing Enfield DMD Policy 5, development involving the replacement of single family dwellings with self-contained apartments, through new build or conversion, must:

- Not harm the character of the area or result in an excessive number or clustering of conversions.
- Not be out of context with the neighbouring properties with respect to height, scale, bulk and massing.
- Not exceed in number:
  - 20% of all properties along any 200m of a road; and
  - 1 out of a consecutive row of 5 dwellings.
- Not lead to an unacceptable level of overlooking and loss of privacy of adjoining properties.
- Incorporate adequate off-street parking and refuse storage arrangements that do not, by design or form, adversely affect the quality of the street scene.

Policy HW-12: High-Quality Built Environment	**Policy HW-HD2: High-Quality Built Environment**

All development, including new build and works to existing properties, must be of high quality and considerate of the locality. 1. Buildings must respond positively to the character of the visible immediate area and have regard to the street scene, prevailing building height and lines, scale and massing. 2. Disproportionately large properties – relative to their plot or neighbouring properties – are considered inappropriate. 3. Extensions should reflect the proportions of the host building and not dominate this or cause overbearing to neighbouring properties. 4. Total building height must not exceed the prevailing height (from ground level, to account for topography) in the immediate vicinity. 5. Dormers should not materially affect the character of the locality and not be dominant. Rooflights should be positioned on less prominent roof slopes, with their size and number remaining modest. 6. Innovative architecture is encouraged but must use materials and architectural details that reference or complement the character and appearance of the immediately visible area and period of development, referencing the Hadley Wood Heritage and Character Assessment. 7. The use of alternatives to uPVC and other synthetic materials is encouraged. 8. External fixtures that require planning approval, such as air-conditioning units and certain security equipment, must be visually inconspicuous.	Proposals for all development, including new build and extensions, will be expected to respond positively to the character of Hadley Wood. 1. Proposals for new development should have regard to materials and architectural details which reference the character and appearance of the immediate area and period of development as identified in the Hadley Wood Heritage and Character Assessment, including the rhythm of existing buildings, and they should respond positively to the overall street scene and neighbouring buildings in terms of prevailing height, scale and massing. 2. Proposals for new development, including extensions, should have regard to the existing street frontages and established buildings lines. 3. Proposed extensions should reflect the proportions of the existing building and not dominate this nor cause overbearing to neighbouring properties. The footprint and positioning of buildings, and extensions, should be consistent with other buildings on the street. 4. Front-facing dormers should not materially affect the character of the area and are not dominant. Rooflights should be positioned on less prominent roof slopes, with their size and number being considered. 5. Additions to houses, such as security systems, outdoor lighting and air conditioning units should be visually inconspicuous. 6. The use of alternative materials to uPVC and other synthetic materials is encouraged. Design guidance and principles illustrated in Section 4 of the Neighbourhood Plan (Figures 6, 11 & 15) shall be used to inform an appropriate development response. Proposals for development should conserve and enhance the Conservation Area. The use of innovative architecture that responds to local character is encouraged. Proposals for new development that mimic traditional styles and features, but do not respond to the proportion or massing of these, are considered inappropriate for Hadley Wood. Applicants will be expected to reflect best practice guidance in proposals for new development and extensions, including that established in Building for Life 12 (or any subsequent updates of that).

	All planning applications are required to demonstrate how they comply with the Hadley Wood Design Guidelines (in Appendix 1A), in addition to the local validation requirements set by Enfield Council. These Guidelines are consistent with National Design Guidance (2019). All planning applications are required to submit a comprehensive set of plans and drawings in line with the Guidelines in Appendix 1B.

Policy HW-13: Small sites Development on small sites[2] must not cause harm to the area or neighbouring properties on any side, including in terms of local character, flooding or residential amenity. For clarity, local character includes prevailing architecture, scale and massing in the context of the natural environment and views. Harm must consider the impacts on all streets in the vicinity and views of the area from prominent locations. To help residents understand planning application decisions and to provide guidance to future applicants, the local planning authority's reports should: a) consider the capacity of the local infrastructure to accommodate incremental development, taking account of cumulative development already constructed or approved (for the avoidance of doubt, this also applies to major developments); b) ensure that exceptions to policies have reasonable justification; c) ensure that precedents used are nearby in the visible locality, had prior authorization from the planning authority (under the same planning framework[3]) and aren't anomalies that should not be emulated[4]; and The default approval of Small sites applications where the vegetated garden space is reduced to less than 50% of the total plot is to include a conditions that removes the Part 1, Class A and E Permitted Development rights (relating to extensions and outbuildings), unless there is clear evidence that further development on the site	**Policy HW-C5: Small sites, including back gardens** Proposals for development on small sites will need to demonstrate that they will not cause harm to the area, whether to local character, flooding or residential amenity, including to neighbouring properties on all sides of the proposed development. Where back garden development is proposed special regard should be paid to: a) The privacy and outlook from existing dwellings, including back-to-back distances established by Enfield Council. b) Compatibility with the predominant scale and rhythm of housing on all streets surrounding the plot. c) Provision of access arrangements that do not create breaks within, and thus undermining, a consistent street front. d) Retention of mature trees and provision of vegetated gardens. They must also consider the capacity of all local infrastructure to accommodate incremental development, taking account of cumulative development already constructed or approved.

[2] Defined, per the London Plan 2021, as sites that are less than 0.25hectare (= 2,500m²) in size.

[3] Inspector's comments re Douglas Close in refused APP/Q5300/W/17/3176938.

[4] Inspector's comments re Parkgate Crescent in refused APP/Q5300/D/11/2153873.

would not harm character, setting, biodiversity, flood risk or neighbours' amenity and privacy.

Policy HW-14: Back garden development

Where back garden development is proposed, in addition to the Small sites policy, special regard must be paid to:

1. The privacy and outlook from existing dwellings, including back-to-back distances established by Enfield Council.
2. Compatibility with the predominant scale and rhythm of housing surrounding the plot.
3. Provision of access arrangements that do not create breaks within, and thus undermining, a consistent street front.
4. Retention of trees and provision of vegetated gardens.
5. The impact on flood risk and mitigating drainage strategies.
6. Deliverability of net biodiversity gains.

Approvals of back garden developments are by default to add a condition that removes the Part 1, Class A, AA, B, E and F Permitted Development rights, unless there is clear evidence that further development on the site would not harm the character, setting, biodiversity, flood risk or neighbours' amenity and privacy.

Policy HW-15: Construction activity

Construction activity inevitably involves an element of disruption. However, constructors must:

a) Minimize impact on residential amenity during the construction phase, particularly in relation to on-street parking of contractors vehicles and the

Policy HW-HD4: Construction activity

Proposals for development should minimise impact on residential amenity during the construction phase, particularly in relation to on-street parking of contractors vehicles and the resulting congestion, light pollution, noise and vibration, dust, emissions and neighbourhood amenity. Constructors should also protect the local environment. This is important to delivery of sustainable development. A Construction Management Plan will be agreed with the applicant in line with the Considerate Constructors Scheme. 'Hadley

resulting congestion, light pollution, noise and vibration, dust, emissions and neighbourhood amenity. b) protect the local environment, to help deliver sustainable development. c) follow the principles of the industry's Code of Considerate Practice[5]. d) provide adequate parking for workers and deliveries in a way that minimizes the impact on residents and does not impair highway safety or the free flow of traffic. e) adhere to Enfield Council's time limitations[6] on when noisy building works (that can be heard at the site's boundary) are allowed to take place: ▪ Monday to Friday: from 8am to 6pm; ▪ Saturday: from 8am to 1pm.	Wood Considerate Construction Guidelines' are detailed in Appendix 4 to the Neighbourhood Plan.

Policy HW-16: Social and community facilities Community facilities, such as education, healthcare, childcare resources, sports clubs and community halls, are of crucial importance to the area. Therefore: ▪ The loss of existing community buildings (Use Class F2) will be resisted, unless it can be demonstrated that demand within the locality for the facility no longer exists or that suitable provision is made elsewhere within Hadley Wood. ▪ Applications to enhance existing and/or provide additional community facilities will be supported. Flexible multi-functional buildings that allow for the widest possible use are especially welcomed. ▪ All proposed development should demonstrate how it responds positively to the local character. Where new facilities are proposed they should be in locations that are accessible to all, including by foot and by bike.	**Policy HW-SF1: Social and community facilities** The loss of existing community buildings (Use Class D1) will be resisted unless it can be demonstrated that demand within the locality for the facility no longer exists, or that suitable provision is made elsewhere within Hadley Wood. Applications to enhance and or provide additional community facilities will be supported. Flexible multi-functional buildings that allow for the widest possible use and activity will be supported. All proposed development should demonstrate how it responds positively to local character. Where new facilities are proposed they should be in locations that are accessible to all, including by foot and by bike. Community facilities for the purpose of this policy include education, healthcare, childcare facilities, sports clubs and community halls.

[5] https://www.ccscheme.org.uk/ccs-ltd/code-of-considerate-practice-2/

[6] https://www.enfield.gov.uk/services/nuisances/noise-nuisance

Policy HW-17: Crescent West Local Parade The Crescent West Local Parade, as defined in Enfield's Core Strategy, provides an important service to the community and is strongly supported. ▪ Proposals for new development and change of use should provide active ground floor uses that contribute to the diversity of the parade and enhance the viability and vitality of the area as a community hub. On upper floors uses that complement the function of the parade will be supported, including residential use (C3 uses). ▪ The scale and design of any proposed development should respond to the qualities of the adjacent Conservation Area and help create a well-defined street frontage with active uses, doors and windows fronting onto Crescent West. ▪ Retail, cafes and restaurants, drinking establishments and community facilities will be encouraged. ▪ Applications should demonstrate how they contribute to the delivery of an improved public realm, including use of a simple palette of materials, street furniture and surface treatments, new tree planting, and improved servicing arrangements. ▪ The local planning authority is strongly encouraged to do everything within its power to help ensure the long-term future of the local shops and eating/drinking establishments in the Crescent West Local Parade, and to resist change of use to activities that do not serve the local community (including housing).	**Policy HW-SF2: The Crescent West Local Parade** Proposals for new development and change of use within The Crescent West Local Parade, as defined in the Core Strategy, should provide active ground floor uses that contribute to the diversity of the parade and which enhance the viability and vitality of the area. On upper floors, uses that complement the function of the parade, will be supported, including residential use (C3 uses). The scale of any proposed development should respond to the qualities of the adjacent Conservation Area and help create a well-defined street frontage with active uses, doors and windows fronting onto Crescent West. Development should not exceed five storeys in height (including roof space), with variation in height promoted that steps up from neighbouring buildings. A design-led approach should be taken that demonstrates how proposals respond positively to the setting and context, including proximity to the Conservation Area as well as the impact on design of local topography. Retail (A1 use), cafes and restaurants (A3 use), drinking establishments (A4 use), offices (B1 use) and community facilities (D1 or D2 uses) will be permitted within the local centre. Proposals that result in the loss of active frontage along Crescent West will be resisted. Betting Shops (use class Sui Generis) are not considered appropriate. Wherever possible, applications should demonstrate how they contribute to the delivery of an improved public realm within the local centre, including use of a simple palette of materials, street furniture and surface treatments, new tree planting, and improved servicing arrangements. Applications that would result in the loss of retail (A1 – A5 uses) will be resisted unless market evidence is provided demonstrating that: 1. The use is no longer viable, as demonstrated by at least twelve months vacancy despite reasonable attempts to let; and 2. The proposal would not be detriment to the character and functions of the immediate vicinity. For avoidance of doubt, this policy applies to the area defined as The Crescent West Local Parade on the Enfield Local Plan proposals map and indicated on the proposals map as a

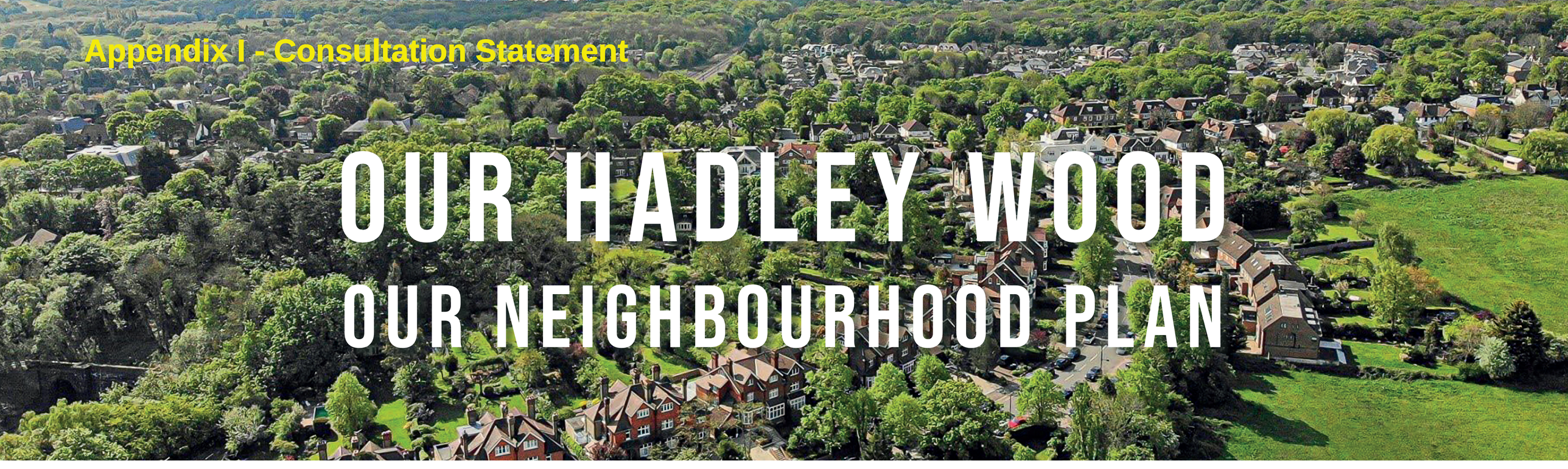
	'Local Centre' (see reference**Error! Reference source not found.** in the Appendix to this Neighbourhood Plan).

Policy HW-18: Active travel Active travel, involving human physical activity rather than motorized movement, is strongly encouraged. Therefore: ▪ Development of safe and convenient improved and/or extended footpaths and cycle paths will be supported. ▪ Any proposals for non-residential use should support and enable active travel through inclusion of safe, secure and convenient cycle parking, as well as changing facilities where appropriate. ▪ Development that enhances the active travel network between Hadley Wood and Monken Hadley, New Barnet, Cockfosters and Trent Park will be supported. ▪ Proposals for development that reduce the capacity or safety of existing active travel infrastructure will be opposed. ▪ Homeowners must cut back trees and shrubs on their land to avoid overhanging or obstructing any part of the public footpaths. Enfield Council must do the same for any trees on public land.	**Policy HW-AM1: Active travel** Support will be given to proposals for development that incorporate improved and extended footpaths and cycle paths. They should be direct, convenient and safe to use. Wherever possible, proposed new development should be laid out such that routes and public spaces are well fronted and overlooked by development, so benefiting from natural surveillance and contributing to a safer pedestrian environment. Any proposals for non-residential use should support and enable active travel through inclusion of safe, secure and convenient cycle parking as well as changing facilities where appropriate. Proposals for development that enhance the network of walking and cycle routes between Hadley Wood, Monken Hadley, New Barnet, Cockfosters and Trent Park will be supported. Proposals for development that reduce the capacity or safety of existing active travel infrastructure, including footpath or cycle space, will not be considered favourably.

Policy HW-19: CIL Allocations CIL payments payable on developments are governed by Enfield Council's guidance and the Government's Community Infrastructure Levy Regulations. • 25% of the CIL paid on developments in the Neighbourhood Plan Area should, where feasible, be used to fund local priorities. • The priorities will be decided by an independent committee that will be set up by the Hadley Wood Neighbourhood Planning Forum, after consultation with, amongst others and as appropriate, the Hadley Wood Association,	**Policy HW-NC1: Developer Contributions** Where development projects trigger the requirement for CIL payments and s106 agreements these will be made in accordance with Enfield Council's adopted guidance or any subsequent updates to this. The neighbourhood element of CIL generated in the area should, where feasible, be used to fund the projects outlined in the Neighbourhood Plan or other projects prioritised and approved in consultation between the HWNPF, HWA, HWRUG and HWS, ideas which but not be limited to:

Hadley Wood Primary School, Hadley Wood Rail Users Group and Hadley Wood Security. The committee will be led by an independent Chair, who is not affiliated with any of the stakeholders or potential beneficiaries of CIL funding. • This policy will equally cover any future changes to CIL payments and developer contributions.	• Public realm improvements to The Crescent shopping Parade • An enhanced network of well-connected walking and cycling routes, including new, all-weather routes to Monken Hadley, New Barnet, Cockfosters and Trent Park. • Remodeling of streets to incorporate sustainable urban drainage systems and new rain gardens. • Creation of a wetland area within Monken Hadley Common that helps discharge and manage surface water run-off. • Improving the quality of community facilities in Hadley Wood, including the Hadley Wood Association Hall and outdoor facilities. The list of possible projects for the spending of any CIL funds will be kept under review and regularly updated.

Appendix I - Reg. 14 Consultation NP Summary & Questionnaire

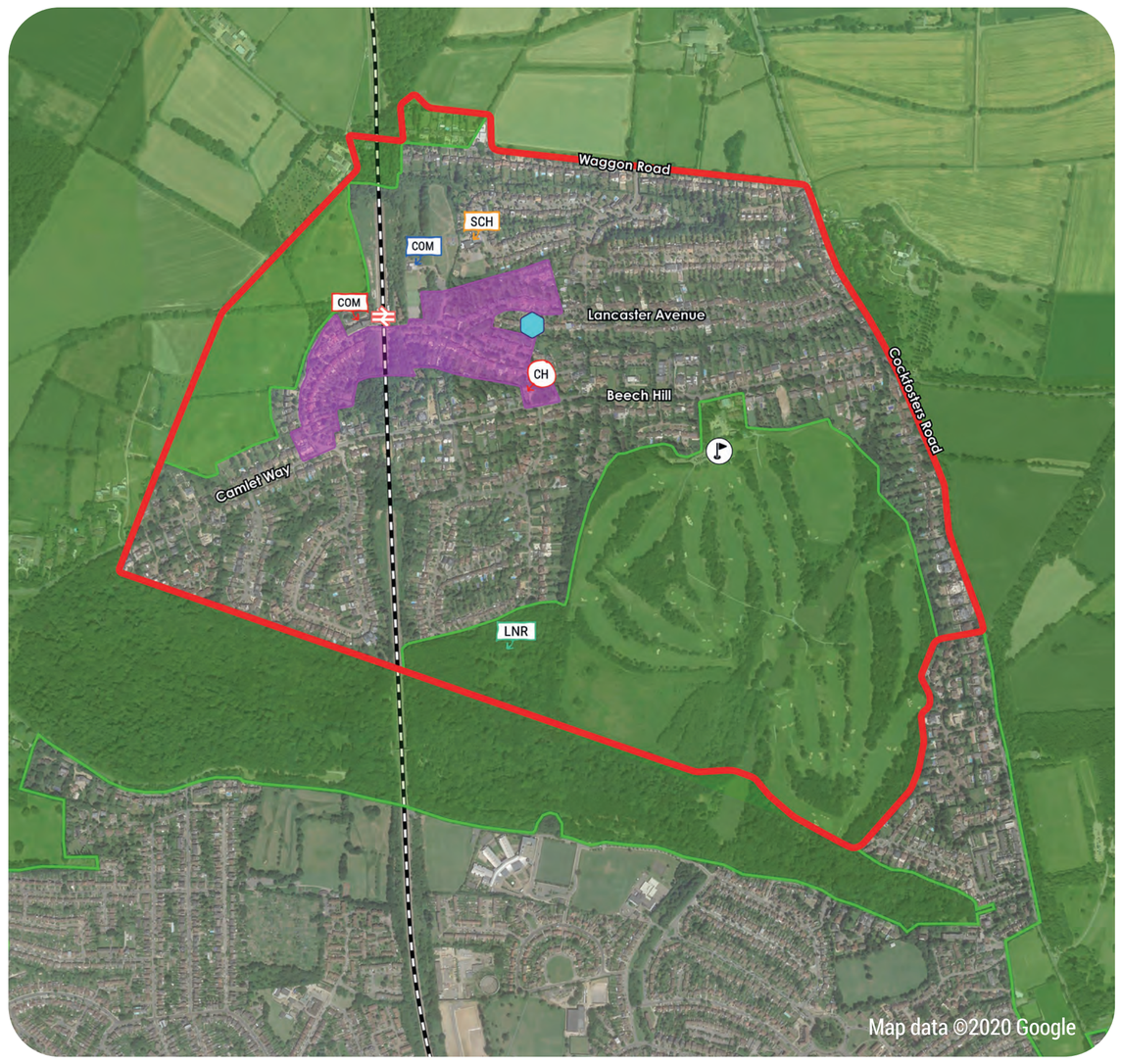


OUR HADLEY WOOD
OUR NEIGHBOURHOOD PLAN

With your support we have prepared a draft Neighbourhood Plan. This is an exciting opportunity for local residents and businesses to influence future development, and to make Hadley Wood an even better place to live, shop and work. Please let us know what you think about the Plan and policies.

- Our community will benefit as we protect and preserve the best of local character and the natural environment, including our local Green Belt.
- Planning applicants will benefit from clearer policies and guidelines.
- Neighbours will benefit from more sympathetic, sustainable and less intrusive development.
- Our community will benefit from accessing 25% of developers' contributions (CIL) to the Council, to invest in local priorities.
- Homeowners will benefit – space, views, trees and gardens add to the marketability and value of our properties.

To find out more about the Plan visit the Hadley Wood Neighbourhood Plan website or view the material at venues around Hadley Wood.



THE AREA COVERED BY THE HADLEY WOOD NEIGHBOURHOOD PLAN

- Neighbourhood Area
- Green Belt
- Conservation Area
- Railway Line
- Hadley Wood Station
- SCH — Hadley Wood Primary School
- LNR — Covert Way Local Nature Reserve
- CH — St Paul's Church
- COM — Community Asset - Crescent West Local Parade
- COM — Community Asset - Hadley Wood Association and Hadley Wood Tennis Club
- Synagogue
- Hadley Wood Golf Club

Note: Context

The Neighbourhood Plan (NP) will provide local planning policy and guidance, alongside the Enfield Plan, Enfield's Planning Policies, the London Plan, and national policy and legislation.

Individual developments will continue to be subject to specific Planning Applications, and the authority to approve or refuse will remain with Enfield Council.

This Neighbourhood Plan will 'add significant weight' to those policies that are of greatest importance to our community.

The NP cannot override the proposal to redesignate and build on the Green Belt. However, the Independent Examiner of Enfield Council's draft Local Plan would attach great weight to the NP having a policy to explicitly protect the Green Belt.

Supporting sustainable development, Preserving our local character and natural environment, Protecting our Green Belt

Please tell us what you think - The consultation period ends on Sunday 3rd July 2022

Please submit your views using the Feedback Form accompanying this summary, or on the electronic copy available to download from the Hadley Wood Neighbourhood Plan website: www.hadleywoodnp.co.uk
Comments in free form in writing are also welcomed. Hard copies can be dropped at Londis on Crescent West, or email your submisison to hadleywoodnp@gmail.com

OUR HADLEY WOOD
OUR NEIGHBOURHOOD PLAN

WHAT IS THE FOCUS OF THE NEIGHBOURHOOD PLAN?

During the production of the Plan many local residents, businesses and other stakeholders were consulted. The key observations and concerns raised included:

- Hadley Wood is a distinct and well-defined neighbourhood, characterised by green spaces, mature trees and beautiful gardens, but new development is putting this at risk and has increased the possibility of flooding.
- There is overwhelming opposition to building on the Green Belt, specifically the local fields owned by the Duchy of Lancaster, but also in the wider area of Enfield, Barnet and Hertsmere that surrounds Hadley Wood.
- The wide range of property styles adds character and variety, and the distance between properties gives a sense of space; new development should reflect the architecture in the immediate vicinity, the best qualities of the built form and not dominate the plot or their neighbours.
- There is a strong sense of community, but the area is poorly served by services and facilities, and those that exist would benefit from refurbishment and renewal.
- Hadley Wood is very poorly served by public transport and there is congestion along the Cockfosters Road, Waggon Road and Camlet Way at peak commuter periods. There is also a need to improve local footpaths and walking and cycling links to surrounding areas.

Tree-lined streets and landscaped front gardens are a key characteristic of Hadley Wood, which the Plan seeks to protect and reinforce

Aerial view looking south east across Hadley Wood, with the railway station in the foreground. This view emphasises the verdant character of the area, which the Plan seeks to protect and enhance.

OUR VISION FOR HADLEY WOOD IS:

Future development in Hadley Wood will follow the principles of 'good growth' by reinforcing and protecting the intrinsic qualities of both the built and the natural environment. New homes will be of a high quality design and provide a wider choice.

Green spaces, trees and vegetated gardens, so important to our distinct character, biodiversity, wellbeing, drainage and air quality, will be given stronger protection.

New footpaths, cycle routes and improved public transport will lead to healthier and more active lifestyles, reducing reliance on the car.

Views of the surrounding countryside are a key feature of Hadley Wood

Supporting sustainable development, Preserving our local character and natural environment, Protecting our Green Belt

Please tell us what you think - The consultation period ends on Sunday 3rd July 2022

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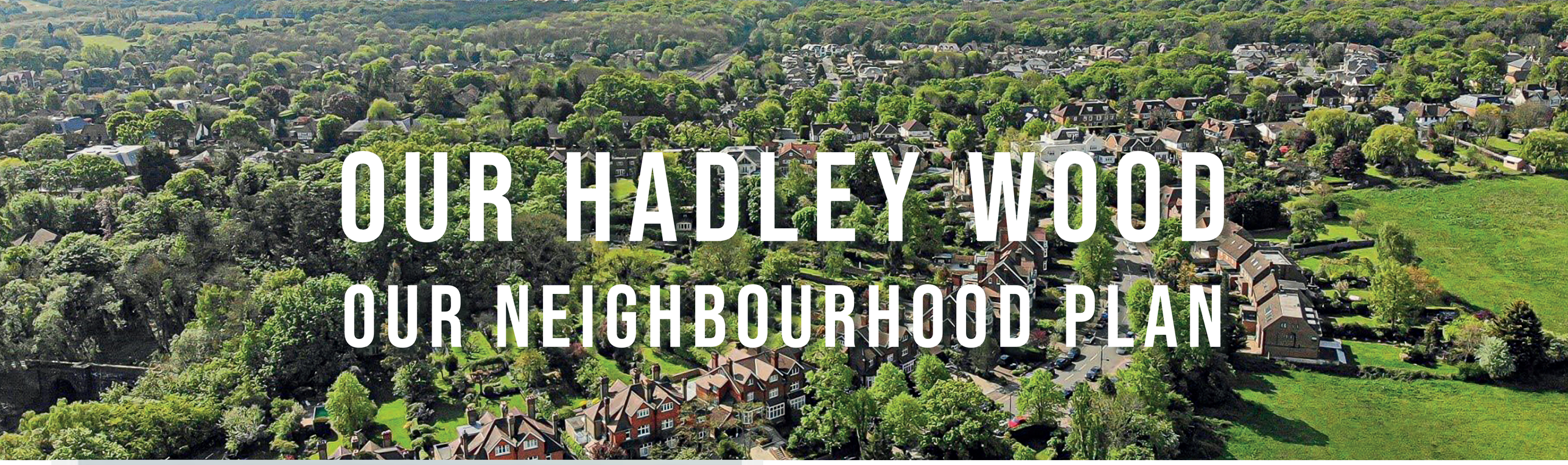

OUR HADLEY WOOD
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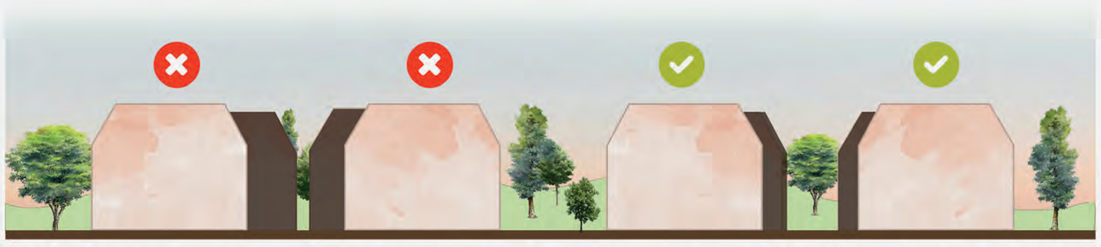
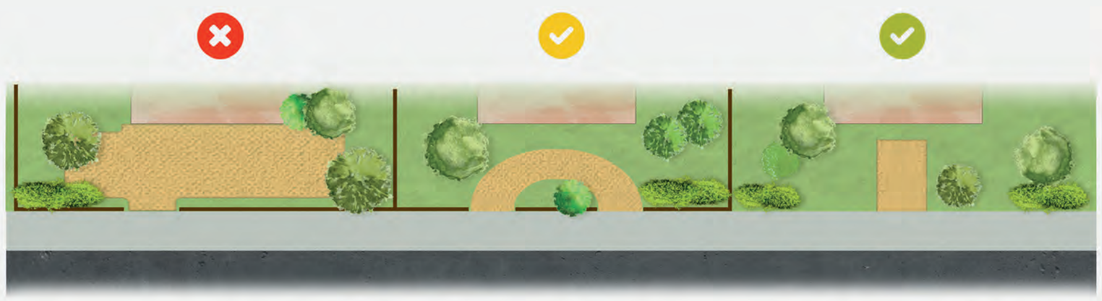
*Above: Many streets in Hadley Wood are characterised by detached properties with space between these providing **a sense of openness and views through to the surrounding landscape**.*



*Above: Where **extensions** are proposed they should be in proportion to the existing building, allowing for the sense of space and views to be maintained. Large extensions and new development which occupy most of or the entirety of the plot width are discouraged. This creates a **terracing effect** which undermines the character of the street.*

*Above: The sense of space and the verdant character of Hadley Wood is also created by the presence of **well landscaped front gardens**, and which should be retained wherever possible. However, this characteristic is undermined by the construction of new boundary walls, railings and gates. Where boundary walls are proposed, they should be of a **low level and allow for views of landscaped gardens behind**.*



*Above: This shows a plan view of houses and front gardens. The presence of boundary walls has led to a sense of enclosure, undermining wide views of the street. The paving over of front gardens with large areas of impermeable surfacing also impacts on the character of the street, as well as contributing to localised surface water issues. Property owners are encouraged to **retain landscaped gardens**, or **reconvert hard surfacing back to landscaping**. Where off-street parking is provided, it should incorporate permeable surfacing and landscaping wherever possible.*

Front gardens that are open to the street are important to the character of Hadley Wood and sense of space. Where paving of front gardens does take place, it should be limited and retain natural surfaces and planting.

A small front garden created alongside new hard-standing

CHARACTER AND NATURAL ENVIRONMENT: DESIGN AND FLOOD RISK

Future development will respect the built character, natural environment and the setting of Hadley Wood, and will more effectively manage and mitigate flood risk and surface water run-off.

Our proposed policies for Hadley Wood are:

- To limit proposals for development that create a 'terracing' effect, and to ensure that space and views of the verdant backdrop between properties are maintained.
- To ensure all new development responds to the scale of existing buildings and considers the capacity of local infrastructure to accommodate incremental change.
- To retain the open nature of the street scene, mature hedges, trees and other natural features. Where front boundary walls, railing and gates are proposed, these should be low level.
- When paving front gardens, a minimum of 25% of the area is to be retained as vegetated green space to protect local character, support biodiversity, and to mitigate flood risk. Permeable and porous materials must be used. Support is also given to the reinstatement of front gardens and planting of trees and shrubs.
- Proposals for development shall be subject to flood risk assessment and make use of sustainable urban drainage systems.

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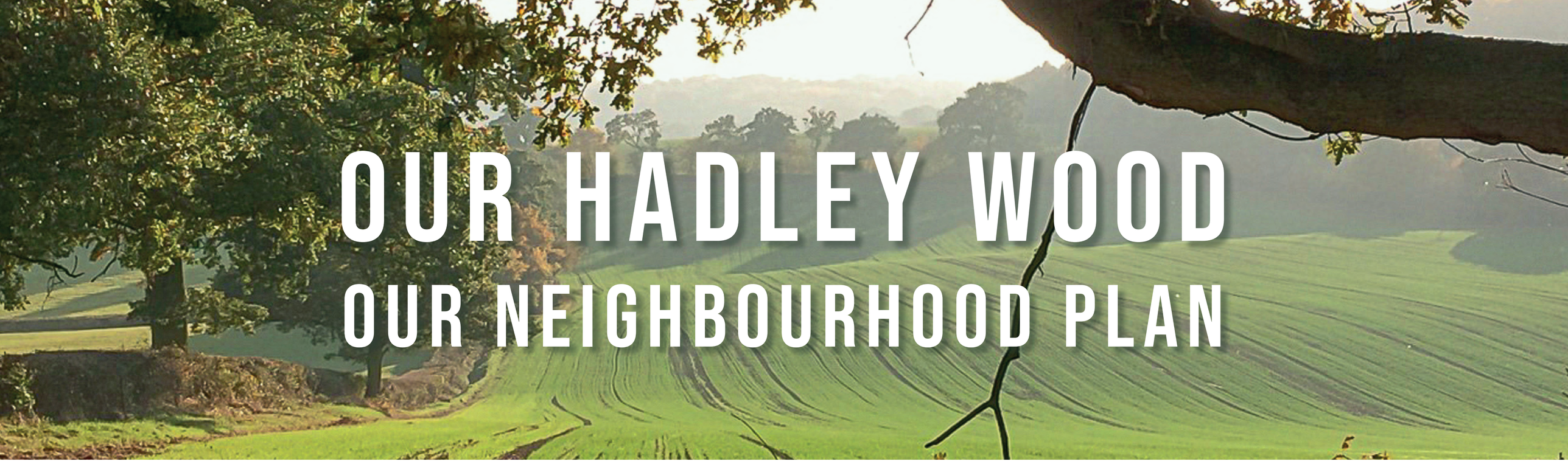

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CHARACTER AND NATURAL ENVIRONMENT: OPEN SPACE

Development should protect and enhance the existing green and open space in and around Hadley Wood, and provide new tree planting.

Our proposed policies and projects for Hadley Wood are:

- To retain existing trees and, where loss is unavoidable as a result of development, to replace them on a ratio of at least 2:1. New and replacement trees should be of species native and appropriate to Hadley Wood.
- To extend the Tree Protection Order in the Conservation Area across the entire neighbourhood area.
- To designate important Local Green Spaces in Hadley Wood that protects them from future change and development.
- To strongly support the retention of the Green Belt within and surrounding Hadley Wood, an area of precious landscape character, of archaeological importance, and a significant natural resource for biodiversity and drainage.

PROPOSED LOCAL GREEN SPACE DESIGNATIONS IN HADLEY WOOD

Note: An adopted Neighbourhood Plan with policies to preserve and protect the Green Belt will strengthen the case to oppose development on the Duchy of Lancaster fields (as included in the Draft Enfield Plan).

Local open spaces and wildlife corridors

1. Hadley Wood Association land to the east of the railway line.
2. Adjoining open space within Hadley Wood Primary School
3. Land above the south tunnel, north and south of Camlet Way
4. Open Space adjacent to St Paul's Church
5. Railway cuttings, either side of the station, and extending into Monken Hadley Common.

Open space within the Green Belt

6. Hadley Wood Association land to the west of the railway line (Bartrams Lane).
7. Hadley Wood Association land over the north tunnel.
8. The fields to the north of Camlet Way and West of Crescent West (owned by the Duchy of Lancaster and adjacent to the HWA land at Bartrams Lane).
9. Hadley Wood Golf Club.
10. Covert Way Nature Reserve.
11. Sewits Hill (private land owned by Hadley Wood Golf Club)

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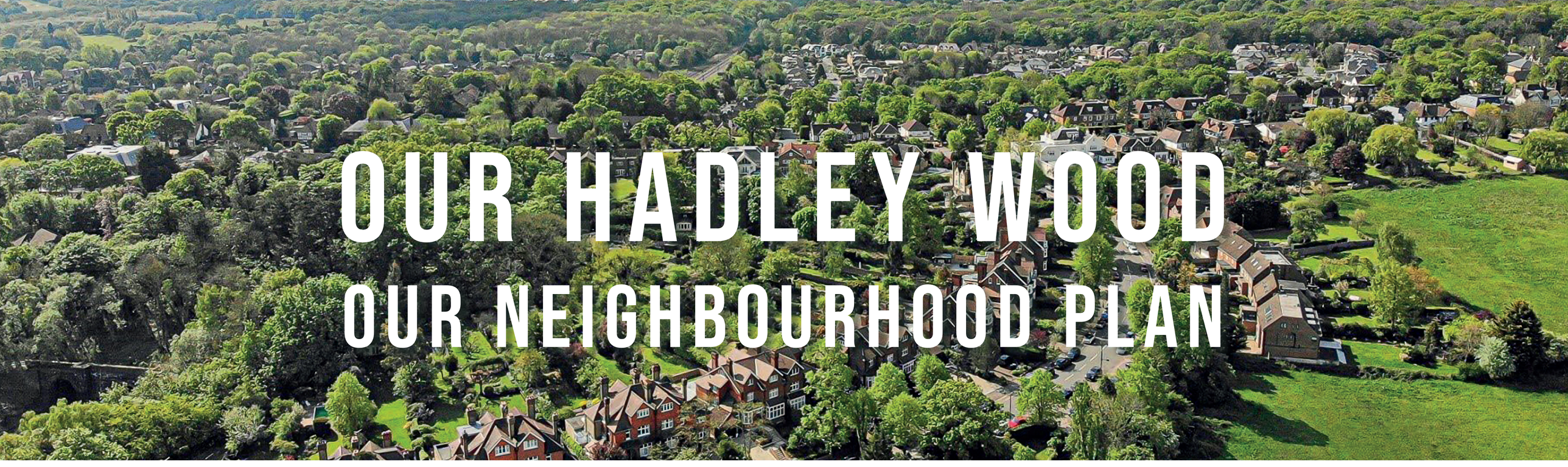

OUR HADLEY WOOD
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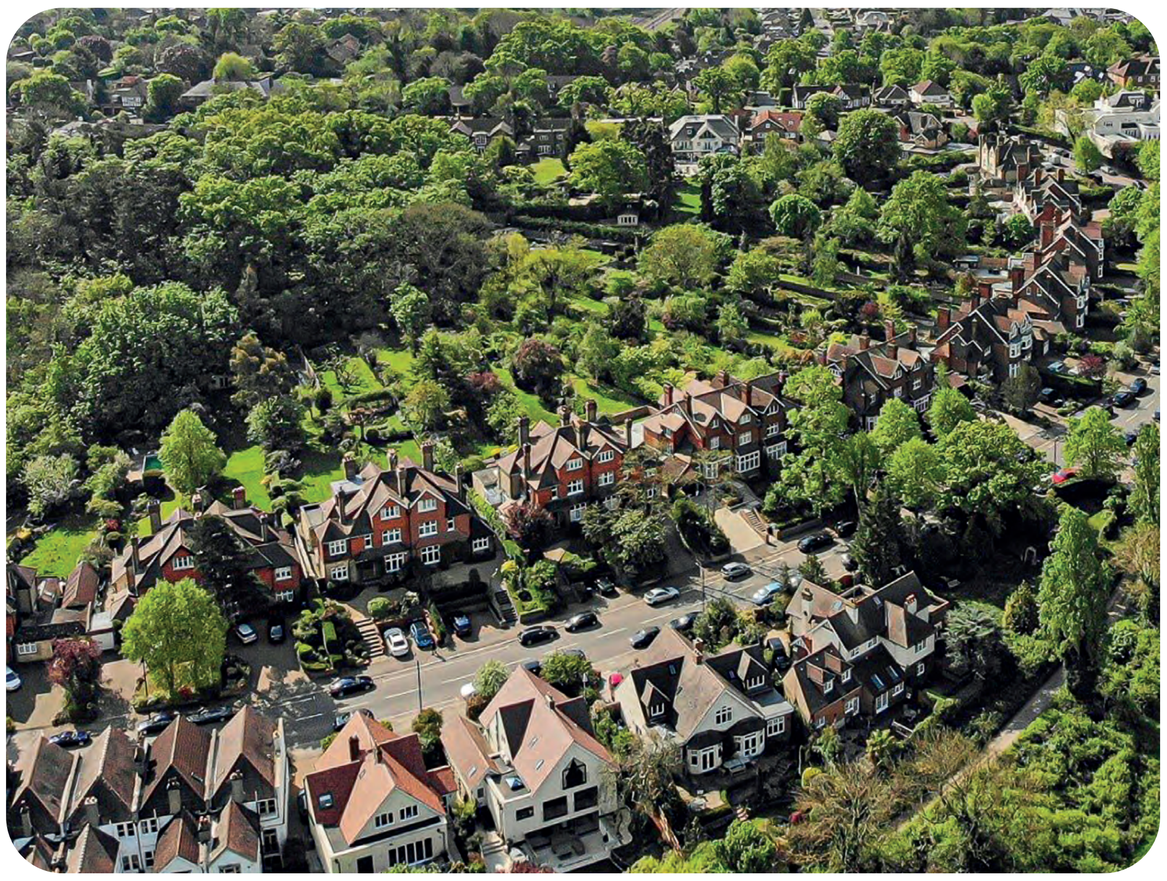
HOUSING, DESIGN AND DEVELOPMENT

Proposals for new housing should provide a mix of housing sizes and types, providing greater choice and opportunity, and be of a high-quality of design, reflecting local character and built form.

Our proposed policies and projects for Hadley Wood are:

- Resist the loss of one, two and three bedroom homes.
- Encourage proposals that provide for people looking to downsize as well as those looking for their first home.
- Seek to provide affordable housing in new development and to design this to be well integrated with and of equal quality to market housing
- Require new development to respond to the height, scale, massing, architectural features and details of existing buildings that characterise each distinct locality in Hadley Wood. Heritage features should be conserved and enhanced.
- New development should respect existing building lines and not dominate or cause overbearing to neighbouring properties.
- Require developers / builders to register under the national Considerate Constructors Scheme, to minimise nuisance to neighbourhood amenity during the construction period.



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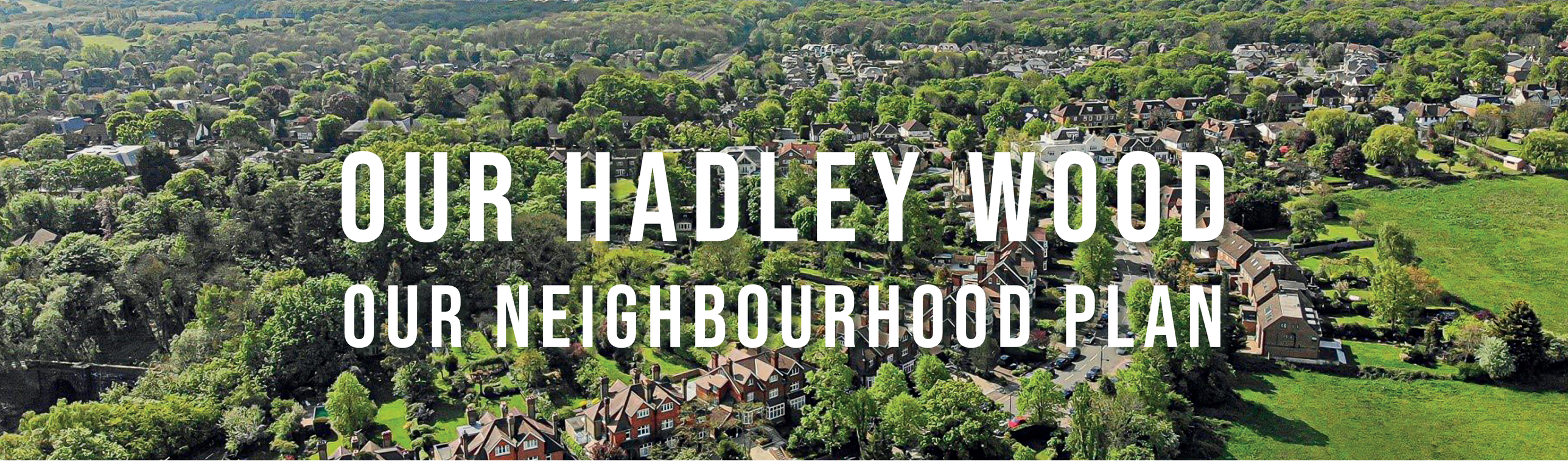

OUR HADLEY WOOD
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SERVICES AND FACILITIES

Development should support and contribute to the provision of community facilities in the area, bringing improvements for the local population and local retail businesses.

Our proposed policies and projects for Hadley Wood are:

- To resist development that would result in the loss of community facilities
- Support applications to enhance or provide new community facilities, which should be accessible to all by foot and by bike, and where facilities are designed to allow for the widest possible use and activity.
- To retain the local shops on the Crescent West parade.
- Where proposals for community facilities or intensification of the Crescent West parade are made, that their design should be of the highest quality and reflect the qualities of surrounding buildings.
- To improve the quality of the public space along the Crescent West parade, including new tree planting and more places to sit and relax, strengthening its role as a community hub.

The Local Parade and Railway Station - Aerial View

The Local Parade

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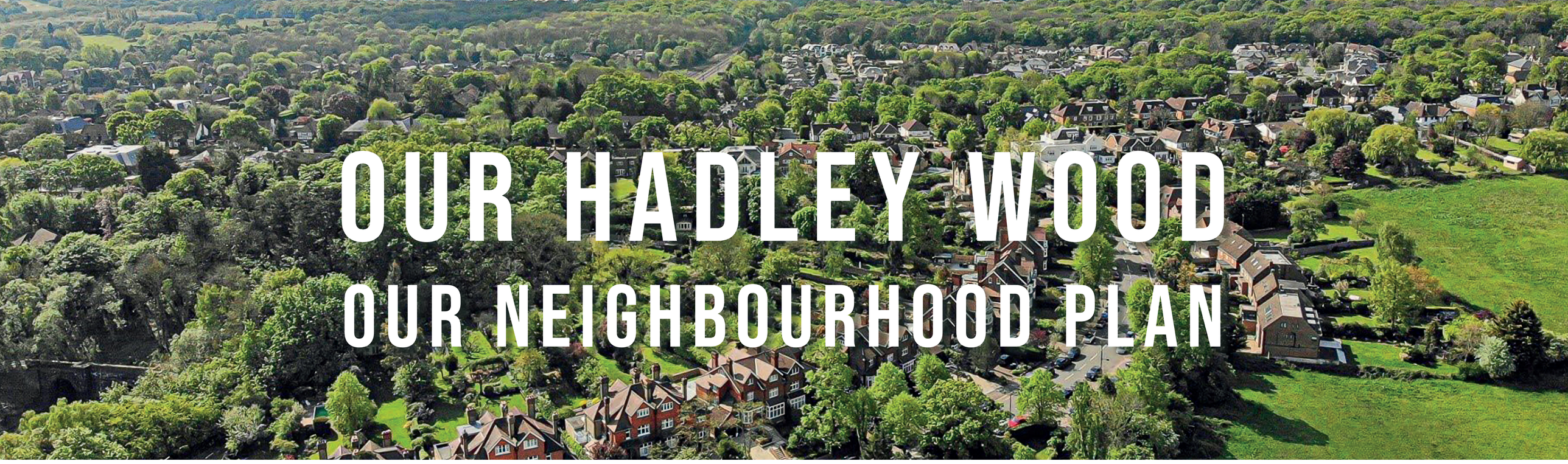

OUR HADLEY WOOD
OUR NEIGHBOURHOOD PLAN

ACCESS AND MOVEMENT

We would like to see better access for all in Hadley Wood. Development should support and contribute towards enhancing the provision of public transport, pedestrian and leisure footpaths and cycle routes.

Our aspirations for Hadley Wood include:

- Encourage proposals to incorporate improved and extended footpaths and cycle paths.
- Enhance the network of safe walking and cycling routes between Hadley Wood, Monken Hadley, New Barnet, Cockfosters and Trent Park.
- To improve bus links from the centre of Hadley Wood to both Cockfosters and High Barnet (potentially by extending the route and frequency of the 399 service).
- Continue to campaign for improvements to railway station facilities.

Hadley Wood Association facilities.

PROJECTS FOR HADLEY WOOD

The Community Infrastructure Levy is a charge levied on development payable to Enfield Council to be spent on infrastructure projects that help address the demands arising from growth. When the Neighbourhood Plan is brought into force 25% of all monies from development in Hadley Wood will be ringfenced for spending on local projects.

We would like to use the neighbourhood portion of the Community Infrastructure Levy to contribute towards initiatives such as:

- Improvements to public space around the shopping parade and station, making this a more attractive place for people to spend time in.
- An enhanced network of well-connected, all-weather walking and cycling routes to Monken Hadley, New Barnet, Cockfosters and Trent Park.
- Incorporation of rain gardens and other sustainable urban drainage systems in the streets of Hadley Wood to help manage and mitigate flood risk.
- Creation of a wetland area within Monken Hadley Common to manage surface water run-off.
- Improving the quality of community facilities in Hadley Wood for the enjoyment of all.

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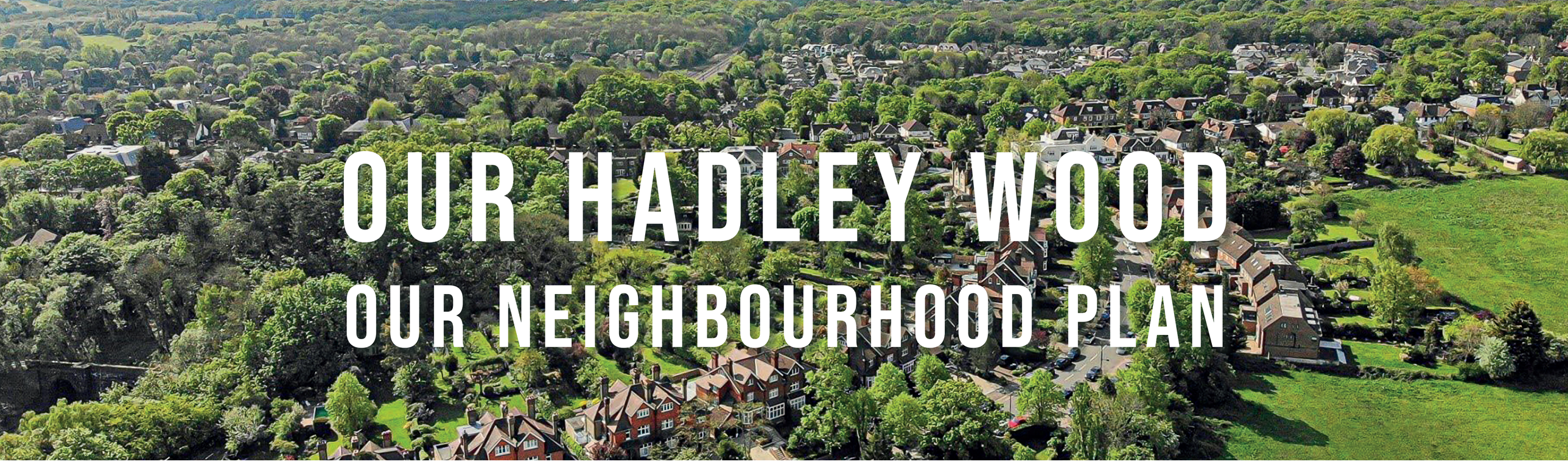

OUR HADLEY WOOD
OUR NEIGHBOURHOOD PLAN

THANK YOU...
FOR READING THIS PLAN SUMMARY.

Please do complete the questionnaire and let us know what you think about the draft Plan and policies.

We will review all feedback and prepare a revised Plan for submission to Enfield Council later this year.

This will be subject to an independent examination and, eventually, a referendum.

If you vote in favour of the Neighbourhood Plan at the referendum it will then be used to guide, shape and determine planning applications and investment opportunities in Hadley Wood. This Plan will put in place policies such that any future growth in Hadley Wood is done in the right way, bringing benefits to the locality and effecting positive change for current and future generations.

Please complete the feedback form that accompanies this summary, and return it to Hadley Wood Neighbourhood Planning Forum, c/o Londis, Crescent West.

The feedback form can also be downloaded from the website and submitted as an email attachment.

Supporting sustainable development, Preserving our local character and natural environment, Protecting our Green Belt

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HADLEY WOOD NEIGHBOURHOOD PLAN

REGULATION 14 CONSULTATION: FEEDBACK FORM

Please Return by 3rd July 2022 to Londis, Cresent West.

The draft Hadley Wood Neighbourhood Plan reflects comments made during earlier consultation events. We now seek your views on the latest draft, which will be considered when the final version is prepared.

Before completing this form please familiarise yourself with the draft Summary and/or Plan, which are available at www.hadleywoodnp.co.uk. The website also has a version of this form that can be submitted online, and it has details of where hard copies of the Plan are made available.

PART 1: PERSONAL INFORMATION

Name	
Organisation (if applicable)	
Address	
Postcode	
Email	

Are you:

A resident of Hadley Wood	
An employee or business owner in Hadley Wood	
Other (please indicate)	

Your age:

Under 25	25 - 45	46 - 65	Over 65	Would rather not say

Are you:

Male	
Female	
Would rather not say	

PART 2: CONSENT

We need to store your personal information in order to process your comments.
Please confirm that you agree to the following:

I consent to Hadley Wood Neighbourhood Planning Forum storing my personal data.	Y	N
I consent to my name being published alongside my comments in the Consultation Statement prepared for submission and examination of the Neighbourhood Plan.	Y	N
I consent to be contacted with regard to my response by Hadley Wood Neighbourhood Planning Forum.	Y	N

General Data Protection Regulations (GDPR): protecting your data

Your details will only be used for the purposes outlined herein. A summary of all comments will be made publicly available, but personal information will be confidential and processed in line with the Data Protection Act 1988 and General Data Protection Regulations.

Per the new General Data Protection Regulations (GDPR), please confirm that the Forum may pass on your contact details (name, address, email address) to Enfield Council so they can contact you at the Regulation 16 consultation and examination stages if required.

I consent to Hadley Wood Neighbourhood Planning Forum passing my contact details (name, address, email address) to Enfield Council so that I can be contacted regarding the Regulation 16 consultation and examination stages.	Y	N

PART 3: COMMENTS

The draft Plan includes policies that will help shape future development in Hadley Wood. These are highlighted in green boxes throughout the Plan and prefixed with the words '*POLICY HW*'.

The Plan also includes wider projects and ideas, which are highlighted in tan coloured boxes and prefixed with the words '*ASPIRATION HW*'.

Your comments will be considered and may result in modifications to the draft Plan before it is submitted to Enfield Council for independent examination.

Please complete the questionnaire and return it to Londis, Cresent West.

Alternatively, you can submit an online form on the website: www.hadleywoodnp.co.uk

Thank you for your time and feedback.

PROPOSED POLICIES

Please tick the number which most closely reflects your view:

1 = Strongly Agree | **2** = Agree | **3** = Neither Agree nor Disagree | **4** = Disagree | **5** = Strongly Disagree

Policy/page Reference	Policy Name	Please tick only one number per row				
HW-C1 *(Page 25)*	**Character, setting and views** *Space and views between properties will be retained*	1	2	3	4	5
HW-C2 *(Pg 29)*	**Trees, the natural environment and biodiversity** *Developers will preserve trees and landscaping*	1	2	3	4	5
HW-C3 *(Pg 32)*	**Boundary walls, railings and gates** *Low walls will allow views of our beautiful gardens*	1	2	3	4	5
HW-C4 *(Pg 39)*	**Paving of front gardens and off-street parking** *Use permeable materials and retain 25%+ as garden area*	1	2	3	4	5
HW-C5 *(Pg 40)*	**Small sites, including back gardens** *Development must not harm character and biodiversity*	1	2	3	4	5
HW-C6 *(Pg 48)*	**Flooding risk** *Development must not increase flooding and waterlogging*	1	2	3	4	5
HW-C7 *(Pg 49)*	**Sustainable urban drainage (SuDS)** *Development must incorporate SuDS to improve drainage*	1	2	3	4	5
HW-iv *(Pg 54)*	**Green Belt surrounding Hadley Wood** *Development on neighbouring Green Belt land will be resisted*	1	2	3	4	5
HW-C8 *(Pg 56)*	**Local Green Space designations (incl. Green Belt)** *Open spaces within the NP area will be even better protected*	1	2	3	4	5
HW-HD1 *(Pg 61)*	**New housing development and mix** *Create wider housing choice (downsizing, small family homes)*	1	2	3	4	5
HW-HD2 *(Pg 68)*	**High-quality built environment** *Development must reflect local architecture and spacing*	1	2	3	4	5
HW-HD3 *(Pg 72)*	**Heritage assets** *Important historical buildings must be protected*	1	2	3	4	5
HW-HD4 *(Pg 74)*	**Construction activity** *The Considerate Constructors Scheme must apply*	1	2	3	4	5
HW-SF1 *(Pg 76)*	**Social and community facilities** *Community buildings must be retained and improved*	1	2	3	4	5
HW-SF2 *(Pg 77)*	**Crescent West local shopping parade** *Shops must be retained and the public space enhanced*	1	2	3	4	5
HW-AM1 *(Pg 82)*	**Active travel** *Improve public transport and footpaths*	1	2	3	4	5
HW-NC1 *(Pg 88)*	**Developer contributions** *Agreed share to benefit the local community*	1	2	3	4	5

OTHER COMMENTS

Please add any comments or suggestions you may have, stating the section of the draft Plan to which they refer:

Section of Plan / Policy Reference	Comment

Appendix J – 2015 Workshop outcome

HADLEY WOOD NEIGHBOURHOOD PLANNING WORKSHOP

26TH November 2015

This is a note of the neighbourhood planning workshop for the Hadley Wood community facilitated by Tony Burton in St Paul's Church on 26th November 2015. The workshop had two objectives:

- To introduce the concept of neighbourhood planning and provide an update on its progress elsewhere
- To report on the results of the survey of community views undertaken in 2015 by the Hadley Wood Association
- To elicit responses to some key questions on issues facing Hadley Wood and the potential role of a neighbourhood plan

Neighbourhood planning – scope and progress

Tony Burton introduced neighbourhood planning and noted the progress across England which has seen over 1,600 communities engaged since enactment of the Localism Act in 2011. This includes around 100 communities across London. Hadley Wood Neighbourhood Forum and neighbourhood area had been agreed by London Borough of Enfield on 7 July 2015. He confirmed that neighbourhood planning was a flexible tool which could address as many or as few issues as the neighbourhood forum wished. Tony provided a reminder that a neighbourhood plan could influence developments and changes of use which required a planning application and also influence the local priorities for use of the community infrastructure levy.

Hadley Wood Association – community survey

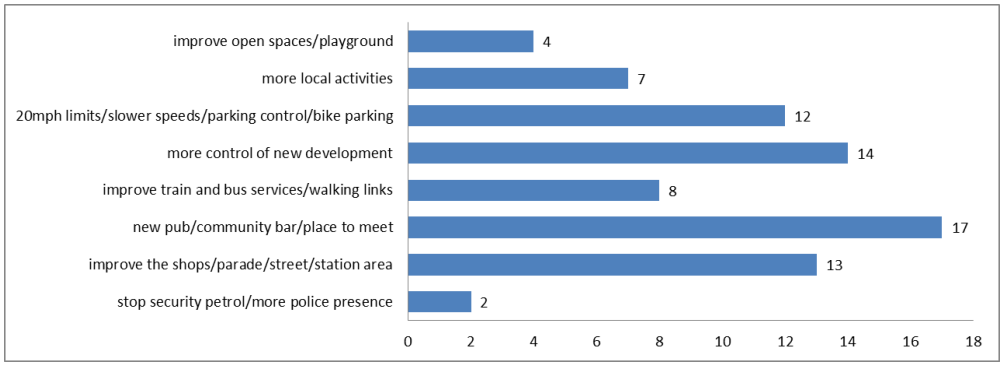
The survey had generated over 100 responses and provided a helpful analysis of the issues of interest to the local community. The full results are available from the Forum (hadleywoodplan@gmail.com).

The survey results include:

What people like

What people dislike

What people would like to change



What do we think about?

The meeting organised itself into a number of workshop groups to focus on some key questions which emerge from the issues identified in the community survey. Each group selected from a list of 24 questions with images to illustrate the relevant question. They recorded response to the issues chosen (see annex).

The choice of issues is one indication of the priority people attach in the area. The issues attracting the most responses were:

What do we think about our shops, station and the area around them – 12 responses

What do we think about houses built behind other houses – 12 responses

What do we think about the distance between neighbouring buildings and the way the boundary in front is marked and planted – 9 responses

What do we think about the Association buildings and land – 8 responses

What do we think about new houses – 7 responses

11 of the 24 questions generated no responses.

Conclusions

A neighbourhood plan can play an important role in addressing many of the issues identified by the local community, both through the community survey and at the workshop.

There is a particular focus on:

- New housing development
- Building and other changes within existing domestic building plots
- The shared facilities of the shops and station and their public realm
- The future of the buildings and land managed by Hadley Wood Association

The first two issues can be addressed through criteria based policies drawing on a good understanding of the character and design qualities of Hadley Wood. The last two issues can be addressed through a more location-specific approach in discussion with relevant owners and managers. The views of Network Rail, Hadley Wood Association and local shopkeepers will be particularly important.

The importance of trees and green space is a recurring theme in the feedback and is identified by many as what defines Hadley Wood's character. A neighbourhood plan has particular scope to identify and designate Local Green Space which is valued by the community.

Annex

Hadley Wood questions for consideration

1. WHAT DO WE THINK ABOUT THE WAY WATER AND RUNOFF IS DEALT WITH?	• No help from Thames Water • More people affected than are coming forward • Planning needs to slow down water
2. WHAT DO WE THINK ABOUT DRIVEWAYS?	
3. WHAT DO WE THINK ABOUT MATERIALS AND STLYES	• Variety is fine but frontage needs to be in keeping with neighbourhood • Keep to the same style of houses. Not these huge new houses
4. WHAT DO WE THINK ABOUT FRONT WALLS	
5. WHAT DO WE THINK ABOUT GRASS VERGES AND STREET TREES?	• Like trees, grass verge, encourage and maintain
6. WHAT DO WE THINK ABOUT ROOF SLOPES, SHAPES, SIZES AND WINDOWS?	
7. WHAT DO WE THINK ABOUT SOLA PANELS AND AIR CONDITIONS UNITS?	
8. WHAT DO WE THINK ABOUT FRONT GATES, ENTRY SYSTEMS AND RAILINGS?	
9. WHAT DO WE THINK ABOUT STREET MATERIALS AND MARKINGS?	
10. WHAT DO WE THINK ABOUT WINDOWS, DOORS AND BUILDING DETAILS?	
11. WHAT DO WE THINK ABOUT MATURE TREES AND HOW THEY RELATE TO BUILDINGS AND OUR SKYLINES?	• Protect older trees • Encouragement to plant new trees in place of diseased ones • Defines Hadley ‘Wood’

	• Part of our identity
12. WHAT DO WE THINK ABOUT BASEMENT BUILDING?	• Resist due to soil issues • Very against – affects water table, causes problems for other houses
13. WHAT DO WE THINK ABOUT GARDEN PLANTS AND LANDSCPING?	
14. WHAT DO WE THINK ABOUT THE 'BUILDING LINE', WHTHER HOUSES ARE ALL IN A LINE OR SOMETIMES COME FORWARD OR ARE SET BACK FROM NEIGHBOURS?	
15. WHAT DO WE THINK ABOUT THE DISTANCE BETWEEN NEIGHBOURING BUILDINGS AND THE WAY THE BOUNDARY IN FRONT IS MARKED AND PLANTED?	• Allowed 1m away but no enforcement, permission given for closer. • Could say 2m to boundary but enforcement needed • Previously has been 1m at ground floor and 2m above but now allowed 3 stories at 1m separation so almost like terraced housing. • Maximising house space and not allowing for garden area. • If/when building is done closer than 1m there is nobody to enforce rules and distances. • Reduces sense of space. Privacy. Impact on light enjoyed by neighbours. Access issues. • Loss of open space, privacy, smaller gaps between properties, lack of natural light • Complicated boundary issues • Any new development should consider the character of the street
16. WHAT DO WE THINK ABOUT THE SHAPE, SIZE AND DESIGN OF EXTENTIONS?	• Need housing design improvement and limits on styles • Too close together, greater distance required

17. WHAT DO WE THINK ABOUT OUR WATERWAY?	
18. WHAT DO WE THINK ABOUT OUR STREETVIEWS? ARE THERE DIFFERENT STREET CHARACTERS? IF SO WHAT AND WHERE ARE THEY?	• What are existing covenants/restrictions – are they being enforced? • Should be in keeping • Limit heights when out of character. • Street character and gating should be better controlled • Keep the different street characters 9keep the open views of streets) e.g. mock Tudor on Parkgate Avenue, keep the same house styles.
19. WHAT DO WE THINK ABOUT NEW HOUSES?	• Accept there will be development but needs to be in keeping • Need housing design improvement and limits on styles • Too close together, greater distance required • Not opposed to new designs but need to be in keeping with area both in terms of style and size. • Keep blocks of flats in proportion to the neighbourhood • Houses too big for their plots • Conservation area should be protected
20. WHAT DO WE THINK ABOUT BINS?	• Eye sore – obligation on home owners to disguise/put away
21. WHAT DO WE THINK ABOUT HOUSES BUILT BEHIND OTHER HOUSES?	• Good gardens for families are a special features of HW • Overcrowded development • Design quality important • Severely limit back garden infill and subdivision • Has impact on green space, traffic, privacy, parking, run off due to increased tarmac.

	• Tree depletion. • Density of population beyond community capacity. • No! completely changes the character of Hadley Wood • Loss of green space and privacy. • Sets a precedent to others to encourage more • Particularly wrong in conservation area • Changes ratio of building to land.
22. WHAT DO WE THINK ABOUT THE ASSOCIATION BUILDINGS AND LAND?	• Get the open space designated as popular, well used, important to community • The Hadley wood open space includes tennis courts/HWA fields and woods over to and including the Bartram's Lane field. • Aim to protect this open space by designation. • Great resource/facility/improve both appearance and access to it. • Hub of the community • Open space designations should be 'local green space' and include tree lines. Both on association land and elsewhere • This should be kept for the people of Hadley wood • Renew the lease and treat the area as green space/green belt.
23. WHAT DO WE THINK ABOUT SIDE AND BACK BOUNDARIES?	
24. WHAT DO WE THINK ABOUT OUR SHOPS, STATION AND AREA AROUND THEM?	• Planning restriction on change of use of shops needed • Improve shopfronts, plants, paving, trees • Restrict car speed by shops • Type of shops/sustainability of shops to meet needs of community

	• Range of shops, their use, local service – need to keep as a local resource • They look shabby/tired. Need joint action to improve • Greater variety of shops, everyday shops 9baker, grocer etc.) would be good. • Enforce parking regulations already in place. • Encourage use of pavement space to facilitate community contact. • Restrict parking to 2 hours • Keep the shops – no change of use • Increase diversity of shops
WHAT ELSE?	• Improve parking • Neighbourhood forum should be automatically informed by Enfield for any new planning application in the area.

Hadley Wood Association

Hadley Wood Neighbourhood Planning Forum

Neighbourhood Plan for Hadley Wood, 2022-2039

Consultation Statement

October 2022

Hadley Wood Neighbourhood Planning Forum

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