

Enfield Council Proposed Modifications Draft Regulation 16 Hadley Wood Neighbourhood Plan Consultation

Schedule 1

March 2023



LBE Draft Regulation 16 Hadley Wood Neighbourhood Plan – Schedule of Proposed Modifications

Proposed Modifications (PMs)

The Council has taken the opportunity to review the Draft Regulation 16 Hadley Wood Neighbourhood Plan and propose the following modifications for consideration:

Date: 17th March 2023

<u>Text in Bold Print</u>	Proposed insertion
Text with a strikethrough	Proposed deletion
References Nos.	PM (Proposed Modifications)

Modifications

PM No.	Page no.	Chapter, Section, Policy, Paragraph, Diagram, Tables, Figures	Proposed Change
Draft Regulation 16 Hadley Wood Neighbourhood Plan			
PM1	3	Forward – Paragraph 3	<p>Brownfield sites can be become available at any time. Whilst Hadley Wood might not have any at present, there is the possibility that they may arise within the plan period. Suggest amending text to no known brownfield sites.</p> <p>REASON: To future-proof the plan.</p>

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PM No.	Page no.	Chapter, Section, Policy, Paragraph, Diagram, Tables, Figures	Proposed Change
PM2	6	Introduction Paragraph 1.2	<p>Last sentence. Delete ‘bringing together more than just planning matters’,</p> <p>REASON: The Neighbourhood Plan once adopted will form part of the development plan for Enfield. The purpose of the Neighbourhood Plan should be explicit in its intention as a planning policy document, dealing with planning matters only. The inclusion of this statement is confusing to the reader.</p>
PM3	8	Introduction Paragraph 1.9	<p>Please source the origin of the 35% figure.</p> <p>REASON: Referenced data should be evidenced.</p>
PM4	15	Hadley Wood today – Paragraph 2.10	<p>The Core Strategy is currently being reviewed and</p> <p>REASON: A Core Strategy Review and producing a new Local Plan are two separate processes. The Core Strategy is not under review and as such the text should be deleted for factual purposes.</p>
PM5	20	Objective 3: Housing	<p>‘Planning officers must assess the cumulative impact on the street scene’,</p> <p>Whilst this is reflected within the objective, it is not stipulated in the associated housing policies.</p> <p>Recommend that each of the objectives are cross referenced to ascertain the policy linkages.</p>
PM6	22	Chapter 4	<p>Whilst we note the inclusion of the text with Policy HW-5 re: the Article 4 direction, this issue applies to more than just heritage assets. As such, we request that at the start of Chapter 4 the plan makes it’s clear to the reader that the Article 4 direction may restrict the scope of permitted development in the conservation</p>

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			<p>area. As such we propose the text below. Note that this should be drawn out in bold, or a text box to highlight the importance of the statement to the reader.</p> <p>Attention is drawn to the Article 4 Direction for Hadley Wood Conservation Area. The Article 4 Direction restricts the scope of permitted development rights in relation to particular sites and particular types of development in the Hadley Wood Conservation Area.</p> <p>Legislation, policy and best practice guidance affecting the conservation area may take precedence over Neighbourhood Plan policies.</p> <p>REASON: To clarify that the application of Neighbourhood Planning policy in this area may be affected by the Article 4 Direction.</p>
PM7	23	Paragraph 4.4	<p>This complements the Council’s Hadley Wood Conservation Area Appraisal and associated Conservation Area Management Proposals, and takes account of the Hadley Wood Article 4 Direction.</p> <p>REASON: Supporting text for accuracy in referencing.</p>
PM8	23	Para 4.4	<p>The Heritage and Character Assessment states, inter alia amongst other things:</p> <p>REASON: Plain English</p>

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PM9	23	Paragraph 4.4 (bullet point 11) and Paragraph 6.14 (bullet point 6)	Buildings are typically two storeys in height (plus roof accommodation) REASON: For accuracy. These are pitched roof buildings, often taller than 3 storeys to the ridge and contain accommodation in the roof space.
PM10	27	Policy HW-1: Setting, character and views	Proposals for development in the Neighbourhood Plan area, including new build, extensions or replacement buildings, will be required to demonstrate how development is must be sensitive to the characteristic views and setting of Hadley Wood and must be in line with the following criteria and : REASON: Unclear what would meet the requirements of “demonstrate”. . Suggested wording would make it a requirement for Enfield Council to determine as above.
PM11	27	Policy HW-1: Setting, character and views	Third line down states ‘characteristic views’. We urge caution when using the word ‘views’ given it is not a material planning consideration. Consider using ‘characteristics’ instead or ‘appearance of the immediate vicinity’ REASON: To ensure the policy is robust.
PM12	27	Policy HW-1: Setting, character and views	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). b) The width of the primary building frontage and offset from side boundaries should reflect that of existing properties in the street. Additional back facades may be acceptable as long as they accord with HW-1.a and

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			<p>appear subsidiary.</p> <p>c) In all cases, development should retain a minimum of 1m offset from side boundaries and this should be increased in line with the prevailing street character or where a greater distance is required to retain views between adjacent properties.</p> <p>REASON: In order for the original text to be enforceable, a baseline width and formula for increasing separation with property width would need to be determined. Using existing street character is easier for the policy user to demonstrate.</p>
PM13	27	Policy HW-1: Setting, character and views	<p>d) (formally criteria c))) where a proposed development may result in a property that has a the bulk and scale of a property is greater than before the works that of established street character, soften the impact the apparent scale should be mitigated by:</p> <ul style="list-style-type: none"> i. tiering development, so upper floors are not the full width of the ground floor; and/or; ii. Having pitch roofs to the sides or crown roofs, and/or; iii. designing extensions that they are subsidiary to the host property, <p>as long as the resulting building remains visually appropriate for the context.</p>

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			<p>REASON: The condition before development should not be the measure of success-this may not have been an appropriate use of the site. The suggested interventions, if read in isolation, could result in some inappropriate building forms.</p> <p>Please also note that crown roof forms would not generally be supported within the conservation area. You may wish to note or caveat this within the policy.</p>
PM14	27	Policy HW-1: Setting, character and views	<p>e) (formally criteria d))} ensure that dormers (either on the front, rear or side of a property) that are not designed as part of the original aesthetic are in keeping with the character of the building and street scene and:</p> <p>i. are limited in number, size and proportion so that they do not dominant the existing roofscape.</p> <p>ii. are inset from the eaves, ridge and edges of the roof (by a minimum of 500, and more where this is reflective of the character of existing dormers in the area).</p> <p>iii. are of the smallest width necessary to accommodate windows that are subservient to the fenestration in the lower portions of the property, normally serving a single per dormer with adequate separation between.</p> <p>are modest in number, size and proportion.</p> <p>REASON: The language is too subjective and the policy would not be</p>

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			enforceable. Note that you could consider adding more quantitative aspects for the scale of Dormers in terms of setting down from ridge.
PM15	30	Policy HW-2: Front boundary walls, railings and gates	<p>Part a) avoid using word 'low level'. There are many examples of over 1.5m height gates so 1m may not be appropriate in these areas. Also, please note that permitted development can allow up to 2m in some cases.</p> <p>REASON: Note language use within the policy and consider amending for clarification.</p>
PM16	30	Policy HW-2: Front boundary walls, railings and gates	<p>Part b) 0.5m high front walls may be considered as low. It would be helpful to confirm what evidence this is based on or where the 0.5 figure derives from.</p> <p>REASON: To ensure the policy is robust.</p>
PM17	30	Policy HW-2: Front boundary walls, railings and gates	<p>e) Railings and gates taller than 1m are not considered 'in character' throughout the majority of streets in Hadley Wood.</p> <p>REASON: This repeats part a).</p>
PM18	30	Policy HW-2: Front boundary walls, railings and gates	<p>d) To ensure safety of pedestrians and road users, gates that have the potential to block visibility of the street must be set back from the edge of the pavement and carriageway, and maintain incorporate visibility splays (Enfield Council's Technical Standards refer¹⁴).</p> <p>REASON: Not all gates are required to be set back unless they are solid, or block visibility in some other way. You could consider the 5.5m distance to add in this policy to avoid vehicles overhanging?</p>

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PM19	30	Policy HW-2: Front boundary walls, railings and gates	<p>All front boundary treatments must, as far as possible, retain the open character of the street scene, hedges, trees, and other natural features and the open character of the street scene. They must also avoid damaging or destroying tree roots.</p> <p>REASON: To avoid ambiguity (previous wording reads that hedges and trees have an open nature)</p>
PM20	35	Policy HW-3: Paving of front gardens	<p>1. Maximise the retained area of lawn and vegetation. A minimum of 25% of the front garden must be retained as soft landscaping, i.e. unpaved (unless individual circumstances <u>render that not appropriate</u>). Homeowners are strongly encouraged to retain the maximum area possible a greater proportion part, of up to 50%.</p> <p>REASON: Suggest retention should be maximised not limited.</p>
PM21	35	Policy HW-3: Paving of front gardens	<p>Points 2 and 3 of the policy could be combined as they are linked in these.</p> <p>REASON: For ease of policy application</p>
PM22	35	Policy HW-3: Paving of front gardens	<p>Until such time that the GPDO 2015, as amended, includes adequate protections of front gardens, the approval of any application for new build, extension to existing dwelling or new/replacement front boundary treatment that reduces the permeable and/or vegetated area of the property is by default 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.</p>

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			<p>REASON: Conditions must be justified in line with para 55 of the NPPF. Part 3 of this paragraph requires they are “relevant to the development to be permitted”. While this may be possible for new build or where new extensions increase the non -permeable area (but not necessarily if other tools are being used such as SuDS), it is unlikely to be justified for the replacement of front walls.</p>
PM23	37	Chapter 4, Setting and Character, para 4.30	<p>The London Plan allows more parking spaces for locations with poor public transport:</p> <ul style="list-style-type: none"> o Table 10.3 of the London Plan (2021) stipulates a maximum of 1.5 spaces per 1, 2 and 3 bedroom housing unit. <p>REASON: Plain English</p>
PM24	37	Chapter 4, Setting and Character, paras 4.31-4.32	<p>4.31 The use of the term “should”, rather than “may”, actively encourages boroughs to allow more parking spaces in certain circumstances. However, to date Enfield has rigidly applied the standards in Table 10.3 and applications with significantly fewer spaces than the London Plan standards are approved.</p> <p>4.32 As the Local Planning Authority has dismissed concerns and objections raised by residents regarding the risks of inadequate on-site parking, the Forum feels it has no choice but to introduce a policy that provides a safeguard against inadequate offstreet parking.</p> <p>REASON: It is important that the Neighbourhood Plan supports the Local Plan and the overall intentions of Enfield Council. As written, the text undermines the processes in place at Enfield Council and as such the Neighbourhood Plan may not be considered ‘in conformity’. The Neighbourhood Plan and the adopted Core</p>

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			Strategy / emerging Local Plan should align, and this should be replicated in both policy and any associated supporting text.
PM25	37/38	Chapter 4, Setting and Character, Policy HW-4: Off-street parking (bullet ppoints)	<ul style="list-style-type: none"> ▪ 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. <p>➤ For developments on other roads the maximum number of on-site parking spaces shall be 1.5 per 1+ bedroom unit.</p> <p>REASON: The third bullet point does not derive from evidence and as such should be deleted. The word 'maximum' has been added for clarification for the policy user.</p>
PM26	42	Policy HW5 – Heritage Assets	<p>It would be helpful to highlight within the supporting text where this policy would lead to a refusal on certain schemes.</p> <p>REASON: To demonstrate that the policy is usable.</p>
PM27	43	5. Natural Environment Paragraph 5.2	<p>It is of archaeological importance, provides access to the countryside for outdoor leisure and recreation, supports biodiversity, and can provide significant flood storage to benefit downstream areas, and is of critical importance as a drainage basin.</p> <p>REASON: Wording provides more direct reasoning to the point of the text.</p>

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PM28	44	5. Natural Environment Paragraph 5.3	Please note when referencing the 2012 document identifying the agricultural land as an “area of special landscape character,” that we now understand these uses do not necessarily provide multiple benefits i.e. these are often poor habitats for wildlife, can pollute the watercourses, drain the land quickly and therefore increase flood risk, aren’t accessible to the public (and therefore do not necessarily provide amenity). This is very different from the historical context of the site (Enfield Chase ancient woodland and hunting ground) and therefore doesn’t help to justify landscape recovery.
PM29	53	Paragraph 5.19	<p>‘In this context lost trees includes those that were removed in the three years prior to a development’. This statement is not enforceable and does not form part of any proposed policy. Please delete.</p> <p>REASON: Any policy requirements should be set out in policy. There is no way to enforce this requirement as such, the text should be deleted.</p>
PM30	53-57	5. Natural Environment – Trees and Biodiversity and Policy HW-7: Trees, the natural environment and biodiversity paragraphs 5.16 - 5.26	<p>Please check that the BNG reference are consistent with the emerging BNG policies (where has 10% BNG has come from, it sounds quite low?)</p> <p>The Policy could also refer to Urban Greening Factor (especially where the development may be on brownfield land). The proposed 2 for 1 replacement of tree policy may need to be more robust – i.e. the developers need to ensure that the newly planted trees establish and there’s a maintenance regime.</p> <p>REASON: Strengthening of the supporting text would provide clarification.</p>
PM31	57	Policy HW-7: Trees, the natural environment and	Point 3 –additional information regarding Tree categories could be added to this policy. I.e. A / B category trees need to be replaced but U category are less

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		biodiversity	<p>important?</p> <p>Information on urban greening – see London Plan 2021 would be a welcome link within this policy also.</p> <p>REASON: To strengthen the policy. Enfield Council can provide additional information on the above if required.</p>
PM32	60	5. Natural Environment – Flood Risk Paragraph 5.30	<p>The occurrence of surface water flooding is directly related to, and exacerbated by, a combination of the urbanisation of the area, the lack of investment in the capacity of the drainage network, and climate change. Although Small changes, such as an extension or alteration to a front garden, do not on their own create additional problems, it is the in-combination can cumulatively exacerbate surface water flooding effects of ongoing change and development across the Neighbourhood Plan area that is exacerbating the problem.</p> <p>REASON: Proposed wording changes provide clarification to the supporting text.</p>
PM33	60	5. Natural Environment – Flood Risk Paragraph 5.31	<p>Note that the SFRA is now dated 2021. This paragraph could be expanded on: “Hadley Wood has also experience groundwater flooding. This is due to the topography of the area, formed by the river valleys, and the interfaces of clay geology with pockets of gravels. It is important that any basement development is accompanied by a Groundwater Flood Risk Assessment so it does not impact negatively on neighbouring developments.”</p> <p>REASON: SFRA has now been updated, as such the latest version should be referred to within the Neighbourhood Plan. The proposed additional text provides local evidence to support Policy WH-8 Flood Risk.</p>

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PM34	62	5. Natural Environment – Flood Risk Paragraph 5.35	<p>Other contributory matters include blocked gullies and partially blocked sewers. Enfield Council and Thames Water recommend improved maintenance and control of overland flows of water through the use of Sustainable Drainage Systems (SuDS). Thames Water also recommends construction of new overflow pipes and provision of SuDS within Monken Hadley Common (The ‘Monken Hadley Common Wet Woodlands’) to allow for storage of the discharge of surface water. Work on this scheme is being led has been investigated by Enfield Council, as the Lead Local Flood Authority, for several years but never approved.</p> <p>REASON: Supporting text amendments / deletions provide clarification to the reader.</p>
PM35	64	5. Natural Environment – Flood Risk Paragraph 5.41	<p>Delete this paragraph.</p> <p>REASON: The supporting text does not add to the policy or plan in general. The statement is not based on evidence and could be considered as bias.</p>
PM36	64	5. Natural Environment – Flood Risk Paragraph 5.42	<p>Please note that Enfield’s DMD Policy 61 already requires all developments to have a SuDS Strategy. Consider deletion of this paragraph if not required.</p>
PM37	64	5. Natural Environment – Flood Risk Paragraph 5.43	<p>Because of the undulations and clay soil in Hadley Wood, basements can significantly increase the flooding risk elsewhere. Unlike many other London boroughs, Enfield does not have guidance on basements. Although Groundwater flood risk assessments are can be required for basements, the quality of these documents varies. Until Enfield introduces guidance on basements applicants are strongly encouraged to ensure that basements are well set back from neighbouring properties and that the guidance from LB Camden is followed – this</p>

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			<p>limits the basement footprint to more than 50% of the host dwelling and 50% of the garden.</p> <p>REASON: Additions and deletions to the supporting text provide clarification to the reader.</p>
PM38	65	Policy HW-8: Flood Risk	<p>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.</p> <p>REASON: We do not agree this is irrespective of scale. Size, scale of the development are vital in determining SUDS measures. I.e. a single extension would not be the same as a full application for 6 flats.</p>
PM39	66	Aspiration HW(vi): Monken Hadley Common Wet Woodlands	<p>The HWNPF strongly encourages the creation of a wetland area within Monken Hadley Common that helps discharge and manage surface water run-off, including the wet woodlands / wetland scheme in the Covert Way Local Nature Reserve.</p> <p>REASON: Deletion for factual correction.</p>
PM40	69	Figure 31	<p>As per the text in paragraph 6.9, this should also include demolition and replacement dwellings, rather than just conversions? Please clarify.</p> <p>REASON: For clarification / consistency.</p>

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PM41	70	Policy HW-10: New housing development and mix	<p>New housing in the built-up area of Hadley Wood should:</p> <ol style="list-style-type: none"> 1. Provide a mix of housing types, sizes and tenures consistent with the most up-to-date evidence in the Local Housing Need 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. 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. <p>Applications should not result in a net loss of one, two or three bedroom homes, homes of a type and size for which there is an evidences need in the Housing Needs Assessment, unless there is clear justification.</p> <p>REASONS:</p> <ol style="list-style-type: none"> 1. No objection, but this is just a repeat of policy elsewhere. It provides no further information or requirements. 2. There is no justification for requiring the “maximum amount”. Affordable

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			<p>housing requirements are already set out in the local plan.</p> <p>3. This just repeats policy elsewhere, but no objection to retention</p> <p>4. “downsizing opportunities is not specific or enforceable. If this is about providing homes with fewer bedrooms, this would contradict the previous statements on larger homes.</p> <p>5. This is repetitive to policies elsewhere, but no specific objection.</p> <p>Final sentence-implication is that a loss of 4bed+ homes is acceptable. In addition, it is contradictory to the previous statement and other policies.</p>
PM42	71	Policy HW-11: Self-contained apartments	<p>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:</p> <p>e Not harm the character of the area or result in an excessive number or clustering of conversions.</p> <p>e a) Not be out of context with the neighbouring properties with respect to height, scale, bulk and massing.</p> <p>e b) Not exceed in number:</p> <ul style="list-style-type: none"> • i. 20% of all properties along any 200 metres of a road; and • ii. -1 out of a consecutive row of 5 dwellings.

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			<p>e c) Not lead to an unacceptable level of overlooking and loss of privacy of adjoining properties.</p> <p>e d) Incorporate adequate off-street parking and refuse storage arrangements that do not, by design or form, adversely affect the quality of the street scene.</p> <p>REASON: The first bullet is redundant because the third has figures. The term “excessive” is difficult to measure. .</p> <p>Note: Most of this policy repeats policies elsewhere (e.g. overlooking and “in character” statements) but no objection.</p> <p>We note that there is no mentioning of Nationally Described Space Standards (2015) and amenity (especially for the family houses provided). A link to this either with the policy or the supporting text would tie in well to Enfield’s DMD Policy 9.</p>
PM43	74	Figure 32:	<p>Please add a key to this diagram.</p> <p>REASON: For ease of reference for the diagram user.</p>
PM44	79	Policy HW-12: High-Quality Built Environment	<p>All development, including new build and works to existing properties, must be of high quality and considerate of the locality.</p> <p>3. Extensions should reflect the proportions of the should be subsidiary to the host building and not dominate this or cause be overbearing to neighbouring properties. All fenestration, features and architectural detailing should be</p>

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			<p>respectful of the host building</p> <p>4. Total building height must not exceed the prevailing height (from ground level, taking into account topography) in the immediate vicinity.</p> <p>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.</p> <p>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.</p> <p>7. The use of alternatives to uPVC including for doors, windows and rainwater goods will not generally be supported in the Conservation area. and other synthetic materials is encouraged.</p> <p>8. External fixtures, such as air-conditioning units and certain security equipment, that require planning approval must be visually inconspicuous.</p> <p>REASON:</p> <p>3. “reflect the proportions of the host building” needs clarifying. Extensions should be subsidiary and not “in proportion”.</p>

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			<p>4. we cannot support this as a blanket approach. There may be instances e.g. at station or on prominent corners, where some additional height is acceptable.</p> <p>5. this is a repeat of previous HWNP policy</p> <p>6. innovative architecture is very subjective and may conflict with earlier statements about pitched roofs.</p> <p>7. clarification to the reader that uPVC will not be supported.</p> <p>Note: a lot of this is either repeating higher tier policy or policy elsewhere in the plan, so is not an overly useful addition to decision making. This may be picked up by the Examiner.</p> <p>We note that there is no mentioning of Nationally Described Space Standards (2015). Reference to this either within the policy or the supporting text would be welcomed.</p>
PM45	110	Policy HW-13: Small sites	<p>As per our comments under Policy HW-1, We urge caution when using the word ‘views’ given not a material planning consideration. Consider using just ‘characteristics’ instead / ‘appearance of the immediate vicinity’.</p> <p>c) We urge caution with the word ‘precedent’ as this could relate to historical permissions which have less weight now. Consider stating ‘examples since 2014’.</p>

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PM46	110	Policy HW-14: Back garden development	Consideration should be given as to whether the distance associated with point 1 of the policy could be qualified? Advise to view Enfield Policy DMD 10.
PM47	112	Policy HW-17: Crescent West Local Parade	<p>Bullet point 1 - 'should provide active ground floor uses'. Is it possible to give a minimum suitable size?</p> <p>Bullet point 5, consider caveating this point with 'unless demonstrated with evidence that the use is no longer viable'.</p> <p>REASON: Providing a minimum size makes the policy measurable and easier to apply. The caveat to bullet point 5 allows for some flexibility for re-use of redundant premises.</p>
PM48	118	Appendix 1	<p>Delete or amend.</p> <p>The guidance is confusing. These apply to small developments but no threshold is applied. Are these requirements in addition to the policy set out within the plan? There are some unreasonable requests included i.e. Flood Risk Assessment for lower ground floor developments. Much of what is requested will already be required for an application to be validated anyway.</p> <p>REASON: The appendix goes beyond policy. It is not clear if these are requirements or recommendations. Suggest deletion or amendments to clarify.</p>
PM49	121	Appendix 2 map	Could we add the Hadley Wood Conservation Area Article 4 Direction onto this map?

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			REASON: For clarification to the Neighbourhood Plan reader.
PM50	127	Appendix 4 – Local Green Space Designations	<p>Whilst this Appendix is useful, it does not refer to any Green Space Assessment having been undertaken. It is important that we understand how sites were assessed and designated. How do they meet the NPPF criteria. Were any sites discounted in this process. It is assumed that form of assessment has been undertaken since 2015. Please add here, or refer to separate supporting evidence base (which is also required to be submitted for examination).</p> <p>REASON: To justify the designations.</p>
PM51	138	Appendix 6, Car Parking, Justification Policy HW-4	<p>Justification: The footnote to London Plan Table 10.3 states that boroughs should consider higher parking standards in certain circumstances where there is clear evidence this would support additional family housing. The use of the term “should” rather than “may” actively encourages the implementation of higher parking standards where appropriate.</p> <p>REASON: Additional wording provides clarification for the reader.</p>
PM52	147-150	Appendix 6, Car Parking, Justification Policy HW-4	<p>Appendix 6 (page 146 (bullet point 2 under figure 60) notes that the lack of sufficient car parking on site is causing unsafe conditions on street with drivers parking on street in an unsafe manner. The Appendix text specifies underground parking as something that has been cut down on as a cost saving measure by developers, however it should be noted that this could also be for feasibility issues such as drainage issues and ramp gradients etc) .</p> <p>We note that The London Plan Policy T6 (c) explicitly states that “an absence of local on-street parking controls should not be a barrier to new development and boroughs should look to implement these controls wherever necessary to allow</p>

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			<p>existing residents to maintain safe and efficient use of their streets.” As well as permitting additional car parking, parking controls could also be considered.</p> <p>Appendix 6 also appears to be challenging planning decisions, publishing images with car registrations visible parking illegally (which is not permitted under GDPR regulations) and quoting comments from developers from planning applications within the area. The purpose of the Appendix is unclear and could invite challenge. It does not add to policy or provide clarification.</p> <p>It is <u>strongly recommended</u> that this Appendix is heavily edited or deleted. Enfield Officers are able to advise further on this recommendation.</p>
PM53	152-157	Appendix 7: Building height	<p>Appendix 7 should be deleted.</p> <p>REASON: The appendix does not add to policy or provide clarification.</p>
PM54	158	Appendix 8:	<p>Which version of the Local Plan is this referring to? The text implies that all other policies / figures are not relevant to the HWNP. This should be clarified. Alternatively this appendix could be deleted as it repeats Local Plan policy.</p> <p>REASON: For clarification. Not necessary to repeat existing and / or emerging policy.</p>
PM55	All	General	<p>All figures, maps, photographs and diagrams should be referenced and annotated / sourced.</p> <p>REASON: The plan should be evidence based.</p>

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PM No.	Page no.	Chapter, Section, Policy, Paragraph, Diagram, Tables, Figures	Proposed Change
PM56	All	General	<p>It is noted that some of the tone and language should be re-phrased when referencing Enfield Council's processes, procedures and decisions. There are some statements within the Neighbourhood Plan as currently worded which the Council at this point can not support. These will be highlighted through a follow up response. It is proposed that policy officers meet with the forum to discuss these to ensure that the Neighbourhood Plan aligns with the other planning documents which form (or will form if the document is emerging), part of the authority's Development Plan.</p> <p>It is imperative that the Neighbourhood Plan once 'Made', compliments this suite of documents.</p> <p>Further information on this issue is provided within the covering letter.</p> <p>REASON: To present a consistent approach to Enfield's policy users and those that implement the policies.</p>

HWNP – re-phrasing schedule: 23.03.23 – Rebecca Raine (on behalf of Enfield Council)

This schedule has been provided further to Proposed Modification (PM) 56 as set out in Enfield Council’s formal response to the Regulation 16 consultation.

The schedule below provides observations to ensure that the Neighbourhood Plan compliments plans within the Enfield Development Plan. Please note that only those ‘required’ (identified in orange boxes) below need to be addressed. Points below labelled as ‘recommended’ are provided to be helpful only, and can be dismissed if they are not considered necessary. For the avoidance of doubt, points 3, 9, 10, 11, 13, 22, 29, 32, 35, 36, 42, 45, 46, 55, 58, 60, 76, 77, 78, 82, 83, 88, 90, 94 and 97 (a total of 25 points) will need to be considered in order to address PM56 of the Council’s formal response (sent by email on 17.03.23).

It is imperative that the ‘required’ amendments are made in order for the address the council’s concerns. The Neighbourhood Plan should align with Enfield’s Development Plan Documents.

It is recommended that you check the ‘golden thread’ of the Neighbourhood Plan – Aims, objectives, aspirations - do each of these relate to the final policies?

Apologies if there is a cross-over with some of the email discussion and recommendations. If any of the points are inconsistent, please do let me know and we can discuss.

Key:

<u>Text in Bold Print</u>	Proposed insertion
Text with a strikethrough	Proposed deletion

Point:	Reference:	Enfield Observation :	Suggested wording:	Recommended / Required:
1	Forward – Page 3	‘The Neighbourhood Plan is based upon the views of the local community’.	The Neighbourhood Plan is based upon the views of the local community and supporting evidence.	Recommended

		The Neighbourhood Plan should be based on evidence as well as views. It's helpful that this is made clear.		
2	Forward – Page 3	'...but has policies that encourage sustainable development,...' As written it sounds like it's preventing. Re-word to become a positive.	... but and so has policies that encourage sustainable development...	Recommended
3	Forward – Page 3	However, recent and rapid development has harmed character and biodiversity. Clarify this this is a view point and not a fact.	However, it is our view that recent...	Required
4	Forward – Page 3	'...no accompanying investment in local infrastructure and services'. Is it a fact that there has been no investment in any infrastructure / services? This may be challenged. Suggest re-wording to cover yourself.	... little no accompanying investment in local infrastructure and services.	Recommended
5	Contents - Page 5	Not sure why some of the appendices are written in black font, and some in green? You may wish you clarify or amend.	N/A	Recommended
6	Paragraph 1.6	Last bullet point. You could clarify that the 'Made' Neighbourhood Plan will form part of the Council's Development Plan.	N/A	Recommended
7	Paragraph 1.7	It might be helpful to start this sentence to clarify what the London plan is, for the benefit of the reader.	The London Plan is the statutory spatial development strategy for the Greater London area that is written by the Mayor of London and published by the Greater London Authority.	Recommended
8	Paragraph 1.9	Check and reference 35% figure. I think 34% is referred to in the Forward.	N/A	Recommended

		Is it a fact that no cumulative assessment has been undertaken? I'd recommend taking this out if it can't be validated.		
9	Paragraph 1.9 Bullet points	<p>Please re-consider the language used for all bullet points.</p> <p>Bullet point 1 - Out of scale is your view. Council won't support this statement. Please re-word.</p> <p>Bullet point 3 – increased occurrences of flooding. Is this evidenced to come directly from new development? Or could climate change be a contributing factor?</p> <p>Bullet point 4 – These issues may not be planning matters. You don't always need planning permission for external lighting. Whilst I take the point that this is a 'change' as highlighted within paragraph 1.7, consider if this is required within the plan. Note that there is no further mention or subsequent policy to address this concern, so consider deleting?</p>	N/A	Required
10	Paragraph 1.10	<p>'Tipping Point'. Council may not agree with this view point.</p> <p>'irrevocably changed'. This sounds like the Neighbourhood Plan is trying to prevent change, thus prevent development. Consider re-wording.</p>	<p>Remove first sentence.</p> <p>Change to the character of Hadley wood could be detrimentally altered.</p>	Required
11	Paragraph 1.11	<p>'We are not trying to turn back the clock, and Enfield's strategic policies are supported, But...'</p> <p>This comes across as defensive. Wording not required to make the point. Please delete.</p>	<p>We are not trying to turn back the clock, and Enfield's strategic policies are supported, But...</p>	Required

12	Paragraph 1.12	Ensure the aims in 1.12 correspond not just to the policies, but also back to the aims and aspirations identified earlier within the Neighbourhood Plan (the golden thread).	N/A	Recommended
13	Policy Box under Paragraph 1.14	Delete first sentence under bullet point 2. This is a given and we shouldn't need to remind officers how to apply Neighbourhood Planning Policy. Last sentence: make it a bullet point. This one may not be supported, but considering this is a key driver for the Neighbourhood Plan, let's keep it in.	Planning officers must consider the Neighbourhood Plan policies as they do with Enfield Council's policies into account when adjudicating planning applications.	Required
14	Paragraph 1.15	Consider adding the end date associated with the designated term here.	N/A	Recommended
15	Paragraph 2.1	'clean air', with relatively low levels of nitrogen dioxide pollution. Could we reference when this comes from with a footnote?	N/A	Recommended
16	Paragraph 2.6	Figures quoted. Can we add a footnote to reference where these figure have come from. Is this census data? That is usually the most robust / reliable figure to quote. If all of the data is from the Local Government Association as per footnote 6, perhaps make this clear at the start of 2.6?	N/A	Recommended
17	Paragraph 2.7	Add date to consultation exercise.	N/A	Recommended
18	Paragraph 2.12	Again, include that these documents for part of the Development Plan for the area. It's just the correct term to use.	N/A	Recommended
19	Paragraph 3.3	Are these additional aspirations, or do they repeat earlier aspirations? Please clarify. Again, the golden thread – why are we setting them out? Do they link to the aims and policies of the Neighbourhood Plan?	N/A	Recommended

20	3.6	Add 'determination'?	in the preparation, and consideration and determination of planning applications.	Recommended
21	Objective 2 – Page 20	Consider re-wording 'frequent extreme weather' to climate change?	N/A	Recommended
22	Objective 3 – Page 20	Remove reference to 'Planning officer's as the Neighbourhood Plan should not dictate the role of officers. Suggest removing 'views' as this is not a planning consideration.	Cumulative impact on the street scene, natural environment, flood risk views and congestion will need to be considered.	Required
23	Objective 6 – Page 21	Amend 'cars' to 'vehicles'?	N/A	Recommended
24	Paragraph 4.4	Inter alia isn't a user friendly term for a planning document. Suggest amending all references to 'among other things' instead.	N/A	Recommended
25	Figure 7 – Page 26 and Figure 10 – Page 29	Where do these illustration originate from? Useful as it is. Please evidence this.	N/A	Recommended
26	Paragraph 4.9	It would be helpful to the reader to include the details of the appeal (as per footnote 16). If this can't be done, suggest deleting as the quote can't be verified.	N/A	Recommended
27	Paragraph 4.10	Last bullet point is green. Should this be black?	N/A	Recommended
28	Paragraph 4.15 and Paragraph 4.16	The plan should not repeat policy. It should only refer to it. Re: Enfield DMD Policy 8 or paragraph 7.2.1. Delete as appropriate.	which states that hardstandings should 'not dominate the appearance of the street frontages or cause harm to the character or appearance of the property or street, and are permeable in line with DMD policies on Flood Risk'. The pressure for off-street road parking continues to see applications for converting	Recommended

			domestic front gardens into parking spaces, ultimately resulting in an aesthetic and environmental impact on the character of a street. This may be through various impacts such as the loss of green landscaping and natural drainage, street furniture, or traditional boundary features such as walls, hedges and garden gates.'	
29	Paragraph 4.20	Delete first part of sentence. The Council can't support this statement.	The reality is that these PD rights are being abused and policy is not being enforced and	Required
30	Paragraph 4.20	Is it a known fact that the surface water drains are at capacity. Can the local water company confirm this? If not, consider toning down the sentence.	N/A	Recommended
31	Paragraph 4.21	Consider adding pedestrians to make the point.	As well as highway safety (especially for cyclists and pedestrians).	Recommended
32	Paragraph 4.24	This needs re-wording to be advisory. This is supporting text, and not policy. The Neighbourhood Plan can not set out what conditions are to be required. Also the text as it stands would quickly become out of date once the plan is 'Made' .	To ensure that the above policy to protect the front gardens applies, approvals of new builds, extensions and new/replacement front boundary treatments are advised to be accompanied by to add a condition that remove the Class F Permitted Development rights for Hard Surfaces. The stipulation will be reviewed if and when the General Permitted Development Order incorporates appropriate protections for front gardens.	Required
33	Paragraph 4.26	Replace 'raise' with 'create'.	N/A	Recommended
34	Paragraph 4.28	'4 to over 15'. Should this be followed by 'in some cases', or have I mis-understood the context of what's being said?	N/A	Recommended

35	Paragraph 4.29	Detetele this paragraph. I don't think it adds to the point being made, and just criticises the Council Council.	N/A	Required
36	Paragraph 4.31 and Paragraph 4.32	As preciously advised. These paragraphs should be deleted. If you are minded to keep, I'm happy to review your proposed amended wording and we can discuss.	N/A	Required
37	Paragraph 4.33	'narrow section of developments' consider re-phrasing to 'some developments'. Check that the policy is clear what type of developments this applies to.	N/A	Recommended
38	Policy HW-4	'By way of apartments'. Does this policy not apply if a house is subdivided into 2 or more houses? If it does, consider deleting 'by way of apartments'.	N/A	Recommended
39	Policy HW-4	Arrow 1 – replace 'shall be' with 'required are as follows:'	N/A	Recommended
40	Policy HW 4	Bullet point 3 – 'appropriate number of additional on-site spaces for..' is difficult to quantify. Is there any adopted parking standards guidance that we can refer to? Just to the policy can be easily applied.	N/A	Recommended
41	Paragraph 4.36	Again, no need to repeat Enfield policy. Reference to it is adequate.	N/A	Recommended
42	Paragraph 4.41	Delete reference to 'Hadley Wood Conservation Area Study Group' not being active. This doesn't add to the plan, it just criticises the group.	N/A	Required
43	Policy HW-5	Point 3. If the heritage list is updated, appendix 3 will become out of date. Suggest that the policy refers directly to the list (rather than Appendix 3) to ensure that the policy is future proofed.	N/A	Recommended
44	Paragraphs 5.4 – 5.5	These sections repeat a lot of other policy I.e. NPPF. Consider referring to it rather than quoting it. Only quote if absolutely necessary.	N/A	Recommended
45	Green Belt section	This section does not result in a policy. I question it's purpose (as may the examiner). It reads like it has been added to prevent development as potentially proposed	N/A	Required

		<p>within the emerging Enfield Local Plan. See additional comments on this section below.</p> <p>If possible, could we discuss. Or could you provide justification for the inclusion of this section. Thank you.</p>		
46	Paragraph 5.9	<p>Release of land from the Green Belt in and around Hadley Wood would not meet the above NPPF criteria:</p> <p>This is a strong statement, noting that the Neighbourhood Plan has not undertaken a formal green belt assessment. Consider rephrasing to make it clear that this as a formal view rather than fact.</p>	N/A	Required
47	Paragraph 5.10	<p>Are the 'Emerging Enfield Local Plan 2019 – 2039' and the Regulation 18 draft Local Plan' the same document? If so, please clarify. They currently read as two versions of the emerging Local Plan.</p>	N/A	Recommended
48	Paragraph 5.10	<p>Please clarify how many is a large number of residents. What population percentage was it? Who are the expert consultants and where can the response be found?</p>	N/A	Recommended
49	Paragraph 5.10	<p>Note reference to page 52, should actually read Page 51.</p>	N/A	Recommended
50	Policy HW-6	<p>*Note at the bottom of the policy.</p> <p>There is no 'approved Local Plan'. Should this read consultation draft? The Local Plan is still emerging and is yet to be examined and adopted.</p>	N/A	Recommended
51	Paragraph 5.16 and Paragraph 5.27	<p>Clarify who Enfield is. Enfield recognises...</p>	Enfield Council recognises...	Recommended

52	Paragraph 5.19	Use of plane English	As such, a result of foregoing Policy HW-7...	Recommended
53	Paragraph 5.20	'overwhelmingly supported'... can we corroborate this sentence with a figure e.g. 75% of those who were questioned?	N/A	Recommended
54	5.21	Use of the word frequent twice in the sentence. Consider re-wording. Is there evidence of subsidence?	N/A	Recommended
55	Page 54	Can the aspiration be generic rather than aimed at the council? The statement as currently written implies that protection is weak.	N/A	Required
56	Figure 24	Does this show flooding from pluvial / fluvial flooding? If so, please clarify. Assume it does as Figure 25 says surface water flooding.	N/A	Recommended
57	Page 59 – first sentence	This refers to 'figure 26 below', but think this should read 'figure 25 below'?	N/A	Recommended
58	Paragraph 5.30	the lack of investment in the drainage network... Can this be evidenced? If not, could we re-word? This is a critique of the Council as the drainage authority and so should be evidenced if it is needed to be said.	N/A	Required
59	Paragraph 5.30	in-combination... We generally refer to this as cumulative effects in planning documents.	N/A	Recommended
60	Paragraph 5.35	Last sentence. Suggest re-wording to remove the word 'never'.	Work on this scheme has been investigated by Enfield Council, as the lead local flood authority, for several years but is yet to be never approved.	Required
61	Paragraph 5.38	Remove the word 'thus' which features twice in this paragraph. For plane English.	N/A	Recommended

62	Paragraph 5.38	Make it clear which type of flooding you are referring to.	Hadley Wood is an area where there is a significant risk of surface water flooding,	Recommended
63	Paragraph 5.43	Clarify what is meant by Enfield.	Unlike many other London boroughs, Enfield Council does not have guidance on basements.	Recommended
64	Paragraph 5.43	Is the London Borough of Camden guidance a requirement or just a recommendation? Clarify that this is a recommendation.	N/A	Recommended
65	Policy HW-8	Point 1 - Future proof the policy. Development will need to comply with this Enfield policy anyway, so suggest deletion of text. Same for point 2.	in line with DMD Policy 59 and 60 or successor policy. in line with DMD Policy 61 or successor policy, in consultation with Enfield Council as Lead Local Flood Authority.	Recommended
66	Paragraph below 6.5 (un-numbered)	A review of planning permissions. Is this provided as evidence? What years did you review and what types of applications were considered? Full / outline?	N/A	Recommended
67	Policy HW-11	Could we number the policy rather than use two different type of bullet points? This would make it easier to reference.	N/A	Recommended
68	Policy HW-11	2 black bullet points. What are these requirements based on? Can we source this?	N/A	Recommended
69	Aspiration HW(vii) – Page 71	Were there any aspirations on non- retirees? Aspirations from younger community members / families?	N/A	Recommended
70	Paragraph 6.12 and Paragraph 6.13	Again, quoting Enfield policy. Can we refer to it rather than repeat it?	N/A	Recommended

71	Paragraph 6.19	<p>‘the draft new Local Plan’</p> <p>Which version? I think we need to be consistent when referring to the emerging Local Plan.</p>	N/A	Recommended
72	Paragraph 6.20 and Paragraph 6.21	<p>Why are ‘tall buildings’ and ‘taller buildings’ in bold highlighting?</p> <p>Where can I view the tall buildings threshold? A footnote would be useful.</p>	N/A	Recommended
73	Paragraph 6.22	Not all back garden as these may not be visible. Clarify this in the text.	but in some cases also that in back gardens.	Recommended
74	Paragraph 6.23	Policy H2 of what plan? London Plan? Enfield Core Strategy / emerging plan?	N/A	Recommended
75	Paragraph 6.26	Add acronym	local planning authority (LPA) is unable to control...	Recommended
76	Paragraph 6.26	As written, this is critical of the Council’s application of PD rights. Request that this is re-worded.	The LPA can withdraw has on occasion withdrawn the relevant Permitted Development rights as a condition in the approval of developments, but this is applied very inconsistently.	Required
77	Policy HW-13	<p>As written this places a requirement on officers. Consider replacing this sentence with ‘proposals should’...</p> <p>Delete point b, but include that under criteria c (not as a criteria, just as a sentence)</p> <p>It is not the role of the Neighbourhood Plan to alter internal processes and the way planning reports are written. The Neighbourhood Plan should shape development via the policy.</p>	<p>To help residents understand planning application decisions and to provide guidance to future applicants, the local planning authority’s reports all proposals should:</p> <p>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);</p>	Required

		<p>Happy to discuss wording for this policy, but the Council can't support this as written. Suggested text provided (to be helpful), but happy for you to review / amend.</p>	<p>b) ensure that exceptions to policies have reasonable justification; e) b) ensure that precedents used are nearby in the visible locality, had prior authorization from the planning authority (under the same planning framework⁷⁶) and aren't anomalies that should not be emulated⁷⁷; and The approval of Small sites applications that reduce the vegetated garden space to less than 50% of the total plot is by default to include a condition 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 would not harm the character, setting, biodiversity, flood risk or neighbours' amenity and privacy.</p> <p>Any exceptions to this policy should be reasonable justified as part of the determination of the planning application.</p>	
78	Policy HW-14	<p>Can we soften the requirement to add a condition and make it a recommendation. I'm not sure we can add this into the policy, but happy to let this be one for the examiner to take a view on.</p>	<p>Approvals of back garden developments are recommended to be accompanied by are to add by default 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,</p>	Required

			biodiversity, flood risk or neighbours' amenity and privacy.	
79	Text under Policy HW-14	Applications are expected to reflect... If this is an expectation, should this not form part of the policy. If it is a recommendation, please soften.	Applications are recommended expected to reflect:	Recommended
80	Paragraph 6.30	'It states...' Provide NPPF refence here.	N/A	Recommended
81	Aspiration HW (viii) – Page 83	Can you clarify where the sensitive or other important locations are?	N/A	Recommended
82	Paragraph 6.34	Please re-phrase to state what developments should do, rather than critique the current process. Suggested text provided, but feel free to amend.	Planning policies should be followed, and approved plans should be implemented. Any conditions of approval should be adhered to. Any changes to the required conditions should be comply with enforcement directives. However, a proportion of current developments frustrate neighbours by not following approved plans or planning policies, not satisfying 'conditions of approval', by submitting numerous designs or change requests (many not minor), and by not complying with enforcement directives.	Required
83	Aspiration HW (ix)	Re-phrase to be more positive.	HWNPF and Hadley Wood Association will continue to work with Enfield Council to ensure develop a more robust approach to that new development complies with planning policies, or advise on enforcement action required if conditions are breached. compliance with planning policies and	Required

			resulting enforcement action when policies are breached.	
84	Paragraph 7.1	Schools.. Could re-word this to say education? That covers a broader basis. Although this may not be applicable within your area. Are there any nursery / play group facilities?	N/A	Recommended
85	Policy HW-16	Last bullet point. Re-word.	...including by pedestrians foot and cyclists bike .	Recommended
86	Paragraph 7.6	‘It is therefore very disappointing that the only restaurant and bar in Hadley Wood recently closed down and the premises are expected to be used as private offices after a Lawful Development Certificate for the change of Use Class was issued in July 2022’. Delete as currently written, or if this is an example, re-phrase to make the point. Avoid using the word ‘disappointing’.	N/A	Recommended
87	Paragraph 7.7	‘The buildings add little to the quality of the area, nor the setting of the Conservation Area – in fact, it adversely impacts on views in Crescent West and Crescent East, both out of and into the Conservation Area’. The buildings, shop fronts and associated public realm are tired and would benefit from investment’. I don’t think the home owners / people residing in these properties would appreciate this sentence. Consider deleting unless it is absolutely necessary to include within the Neighbourhood Plan. Remember it’s	N/A	Recommended

		<p>that backing of residents needed at referendum to get the plan 'Made'.</p> <p>If you need to make the point, suggest re-phrasing as this is as an area of opportunity.</p>		
88	Policy HW-17	<p>Detetele last bullet point as the Local Plan policies will provide protection anyway.</p> <p>Consider adding supporting text within the Neighbourhood Plan to make the point instead, saying that you will work with the Council to ensure the long term future of the parade is protected, but I think the 4 bullet points as written already provide the protection.</p>	N/A	Required
89	Public Realm – Page 89	<p>Again, like the green belt section, this doesn't result in a policy. Would question the purpose of this text.</p>	N/A	Recommended
90	Policy HW-18	<p>Bullet point 5.</p> <p>I'm not sure this is a planning matter. You could advise homeowners to cut back trees, but the Neighbourhood Plan isn't the correct platform to do that. By all means leave it in and let the examiner take a view.</p> <p>Remove last sentence re: Enfield as the policy does not need to remind the Council of it's public duty.</p>	<p>Enfield Council must do the same for any trees on public land.</p>	Required
91	Paragraph 8.20	<p>Reference public consultation – type and date?</p>	N/A	Recommended
92	Paragraphs 10.1 to 10.4	<p>You may wish to update this section with the reg 16 consultation and submission info?</p>	N/A	Recommended
93	Section 11	<p>As previously advised. There is no need to repeat the policies in full, however a schedule of the policies would be helpful within this section. I can provide an</p>	N/A	Recommended

		example if that would be helpful. Aspiration could just be bullet pointed also.		
94	Appendix 1	As this guidance compliments the council's requirements I would tone down the wording as it currently reads as policy. I do wonder if some of these guidelines undermine or repeat the plans actual policies?	N/A	Required
95	Appendix 4	As previously mentioned, it is import to show how and why the sites have been selected for designation. What process was involved, what assessment has been undertaken. Justify how and why each of the designations meets the NPPF definitions. See examiner's report that I sent to you Steve on 22.03.23. Happy to discuss further if needed, but I'm certain this will come up as an issue at examination, so best to get ahead of it if we can. If the summary provided on page 135 IS the assessment, this should feature at the start of the Appendix, and also referred to within the body of the Neighbourhood Plan.	N/A	Recommended
96	Appendix 5	I think this just repeats what is in the body of the Neighbourhood Plan and so question what it adds. There is no policy, so there is no need to 'justify' if that makes sense?	N/A	Recommended
97	Appendix 6 and 7	I understand these have been revised now and sent to me for review. As such, I will provide comments on the revised appendices and provide comments to you directly. Re: Email received from Steve on 21.03.23	N/A	TBC

98	Appendix 8	Does this relate to the adopted Core Strategy policies map, or the map associated with the emerging Local Plan? Clarification would be helpful.	N/A	Recommended
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The Neighbourhood Planning Forum Committee
c/o HWA Centre
1-7 Crescent East
Hadley Wood
EN4 0EL

CBRE

CBRE, Inc.
Henrietta House
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W1G 0NB

15 February 2023

By Email

Dear Sir/Madam

Draft Hadley Wood Neighbourhood Plan 2022-2039: Regulation 16 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 16 consultation.

Following the Hadley Wood Neighbourhood Forum's publication of previous drafts plans in May 2020 and May 2022, the submission draft has been formally submitted to Enfield Council for Regulation 16 consultation. The comments received during this consultation will be passed to the independent examiner, who will consider the representations and recommend whether the draft plan should be put to a community referendum.

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 Enfield Council and 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

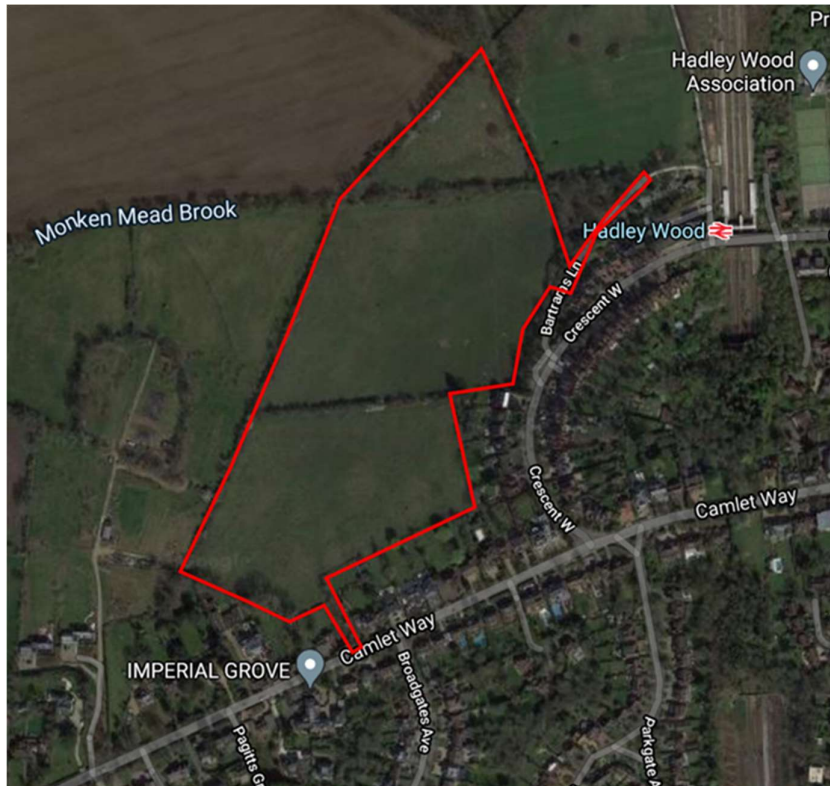
The Site is located to the northwest of Camlet Way and Crescent West approximately 100m to the west of Hadley Wood Station. The site consists of 11.05ha of pasture/grazing land, including a brook, which runs east-west through the northern portion of the site.

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 within Enfield's existing 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 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 located 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

Enfield's Draft Local Plan (June 2021) will provide at least 24,920 new dwellings in the 20 year plan period up to 2039, equating to 1,246 homes per year. This is in line with the London Plan (2021) 10-year housing target for net housing completions of 12,460 for Enfield.

Enfield's Local Housing Needs Assessment (November 2020) sets out the objectively assessed need requirement for the draft plan at 1,744 dwellings per annum, equating to an overall need of 34,880 homes over a 20 year period. This evidence base document demonstrates there is a significant need for new homes in Enfield over the 20-year plan period, which will not be met by the draft Local Plan target.

Draft Policy SPH1 (Housing development sites) allocates the Duchy's site between Camlet Way and Crescent West for release from the green belt and housing development, indicating an estimated capacity of 160 units.

Whilst the Council are refining their spatial strategy in response to the comments received during the Regulation 18 consultation, it is still expected that amendments to Green Belt boundaries will be required to meet the Borough's housing needs. The draft Local Plan and its evidence base demonstrate significant need for new homes in Enfield over the next 20 years. The Duchy's site is a critical component of meeting the development needs of the borough.

It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan. Section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan. As the emerging Local Plan proposes to release the Duchy's site from the Green Belt, the neighbourhood plan should align with this otherwise there is a risk the neighbourhood plan policies would be overridden when the new plan adopted. Furthermore, the Government's Neighbourhood Planning PPG (updated September 2020) confirms "It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies" and that "neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed".

It is not considered that emerging evidence of housing need within the borough has been addressed within this neighbourhood plan. The neighbourhood plan does not account for how the significant housing need, within Enfield's Local Housing Needs Assessment, will be met within the neighbourhood plan area and does not align with the Council's emerging spatial strategy which recognises some green belt release will be necessary to meet housing needs. As such, the neighbourhood plan contradicts spatial priorities at local level.

The Duchy's site will be a critical component of meeting the housing needs of the borough through release from the Green Belt, yet the neighbourhood plan seeks to prevent Green Belt release and designates this land as 'Local Green Space'. The plan should align with the Council's emerging local plan and up-to-date evidence base, and recognise the Duchy's site as important towards meeting the borough's significant housing need. The Duchy would welcome engagement with the Hadley Wood Neighbourhood Planning Forum to identify indicative delivery timescales for their site, to ensure future housing supply is accurately reflected in the neighbourhood plan. Appreciating that the Neighbourhood Plan is being brought forward ahead of the Local Plan, for clarity as set out in Paragraph 16(F) of the NPPF it may be worth adding clarification in the supporting text of policies that relate to this land. The Neighbourhood Plan should include a positively worded policy that it will be updated to align with the vision that is adopted through the strategic plan making policies.

The comments above form the basis upon which the following amendments are sought to the neighbourhood plan.

Vision

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

However, the vision should be amended to 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 in line with national, regional and local policy~~”. For the reasons set out above, it is important that the policies within the neighbourhood plan do not contradict the adopted or emerging development plan by giving ‘stronger’ protection to the green belt. 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.

Objective 01: Green Infrastructure and Natural Environment

Objective 01 states that “~~the Neighbourhood Plan does not propose any amendments to the Green Belt, and opposes inappropriate development in the Local Green Belt, both within and immediately surrounding the neighbourhood area~~”. The Duchy request this reference is removed given it conflicts with the Council’s emerging Local Plan and evidence base. Even though the Council are refining their spatial strategy, it is still expected that amendments to Green Belt boundaries will be required to meet the Borough’s significant housing needs. The Duchy’s site will continue to be a critical component to meeting the development needs of the borough. At the very least, the policy should be positively worded to account for any reviews that are made through the strategic plan making documents.

Text from 5.1 to 5.13 and ‘Aspiration HW(vi): The Green Belt’

The text from 5.1 to 5.13 and ‘Aspiration HW(iii): The Green Belt’ is not considered appropriate and should be removed.

The neighbourhood plan should not oppose release of Green Belt land where this is directly contrary to proposed release within the emerging Local Plan. The Duchy of Lancaster has submitted representations to Enfield’s Regulation 18 consultation to demonstrate how their site, between Camlet Way and Crescent West, can assist in meeting housing needs and should be released from the green belt.

Provisions are made within the NPPF at Section 13 for review and appropriate release of Green Belt land in exceptional circumstances, identified through the preparation or updating of local plans. It is well established that the land requirements to meet development need, such as housing need identified in a local plan, can form such an exceptional circumstance.

The Duchy’s site is assessed as part of a wider Green Belt parcel (EN3) within the Council’s Green Belt and MOL Assessment (2021). The harm of releasing parcel EN3 as a whole is identified as ‘high’, however when only assessing a smaller parcel cognizant with the Duchy’s site, this was downgraded to ‘moderate’. The Green Belt Assessment identifies this site as one with a notable opportunities to minimise harm. It notes there is a regular and consistent boundary to the west of the site, and so release of the site would only result in a minor impact on the distinction of the adjacent Green Belt. This boundary provides a well-established screen of vegetation and release of the site would continue the existing urban boundary northwards. As such, the site would seem appropriately located for release with a clear defensible boundary that would minimise impact on the adjacent green belt land.

Paragraph 5.9 of the Neighbourhood plan suggests the release of land from the Green Belt in and around Hadley Wood is inappropriate due to Hadley Wood being an isolated and car-dependent community with lowest levels of public transport accessibility. A Transport Appraisal has been prepared by i-Transport in respect of the Duchy’s site. This concludes that the site is very well located to meet the key transport tests identified by paragraph 110 of the NPPF:

- The site is well located to local facilities and services, with Hadley Wood rail station available within a short walking distance and providing frequent rail services to central London and Welwyn Garden City. Higher order facilities, including Barnet High Street, are located a 2km walking distance.
- Safe and suitable site access is readily available from Camlet Way and/or Crescent West, which has been tested by the Transport Appraisal.
- There is an opportunity for development of the site to deliver a new connection between Camlet Way and Crescent West.
- The Appraisal notes that development of the site would result in modest traffic impacts that would quickly disperse across this area of the borough that is not constrained in highways terms. As such,

there is not considered to be any transport or access constraints limiting the site from being brought forward for development.

Paragraph 5.9 of the Neighbourhood Plan states that the natural and historic setting of Hadley Wood would be harmed by Green Belt release. A Landscape and Visual Matters Due Diligence Report and Built Heritage Report have been prepared in respect of the Duchy's site, which assesses the landscape/townscape and visual impact and built heritage considerations of developing the site.

- The Landscape Visual Report acknowledges that the landscape of the site is potentially visually sensitive to development, however it states that development could still be undertaken in a way that is consistent with the wider townscape pattern.
- As the northern part of the site is SINCE, there may be opportunities for this area to be retained as wilder or informal open space. This would help to maintain views out from the rear of the houses along Crescent West and the Hadley Wood Conservation Area.
- Whilst the Hadley Wood Conservation Area appraisal notes a key outward view from Crescent West across the site, the Built Heritage Assessment notes this is now far more restricted and glimpsed in nature owing to mature planting which now marks the edge of Crescent West.
- The site is located to the immediate east of Monkton Hadley Conservation Area, however there is minimal inter-visibility between the two areas, due to the density of hedgerow planting. The Built Heritage Assessment notes that an appropriately and sensitively designed development could be brought forwards on the site, suitably mitigating potential impacts to heritage assets.

The Duchy's site is predominately located within Flood Zone 1. Parts of the site to the north around the Brook are within Flood Zone 2, however this is a small area and residential development could easily be located away from the areas at risk of flooding. As such, flood risk is not considered a site constraint that should prevent the site coming forwards for housing development.

Therefore, contrary to the points at paragraph 5.9, the above demonstrates that exceptional circumstances for Green Belt release can be justified in respect of the Duchy's site, in accordance with Paragraph 140 of the NPPF. The emerging local plan has identified the requirement for an amended Green Belt boundary at a strategic level to meet borough-wide housing needs. Rather than contradicting this, the neighbourhood plan should acknowledge this and identify the Duchy's site for release from the Green Belt and housing development as part of the direction of travel. This could be appropriately captured in the supporting text.

Policy HW-C8: Local Green Space Designations

The Duchy's site between Camlet Way and Crescent West is located within Local Green Space designation 8 (The fields to the north of Camlet Way and West of Crescent West).

As set out above, there is a significant need for new homes in Enfield. This will inevitably require greater intensification of brownfield land and existing urban areas, as well as additional Green Belt release. The Duchy's site between Camlet Way and Crescent West remains 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 its release from the Green Belt. It is not appropriate to designate this site as Local Green Space, in light of its draft housing allocation and borough-wide pressure to deliver new homes. Such a process would be premature ahead of the strategic direction of the Local Plan.

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 reasonably close proximity to the community it serves:

In respect of point a, whilst the Duchy's land is in close proximity to the urban area, it does not serve the community in a practical manner. The land owned by the Duchy in both is not publicly accessible and is operated as agricultural 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).

Demonstrably special to a local community and holds a particular local significance:

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. It is an extensive tract of private farm land and is not accessible to the local community. Appendix 4 of the Draft Neighbourhood Plan sets out a series of comments, although it is not clear how each have been ranked and decided upon. Notwithstanding this, the Duchy have assessed their land in designation 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.

The site is located to the immediate east of the Monkton Hadley Conservation Area boundary. However, there is minimal inter-visibility between the two areas, due to the density of hedgerow planting.

- **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.

The site is some distance from the Battle of Barnet Registered Battlefield (this designation heavily overlaps with the Monkton Hadley Conservation Area). The distance of the battlefield from the site and density of intervening tree cover is such that any development on the site is unlikely to impact upon the battlefield's setting or the way in which its high significance is appreciated and understood.

- **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 Duchy 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.

Local in character and is not an extensive tract of land:

In respect of the final point, at 10.05ha the Duchy's site is an extensive tract of land, which stretches across a number of field boundaries. The Duchy's land is private farmland and for these reasons is not local in character.

Overall, the rankings within Appendix 4 of the neighbourhood plan are incorrect and the Duchy do not consider there is sufficient compliance with NPPF policy tests to designate their land as Local Green Space. It is requested that Local Green Space designation 8 is removed. The introduction of this designation would

be contrary to the draft site allocation and Enfield's emerging evidence base given borough-wide pressure to deliver new homes.

Policy HW-4: Off-street parking

Whilst it's important to provide adequate parking provision, it is also important the neighbourhood plan reflects the Mayor of London's strategic target for 80% of all trip in London to be made by foot, cycle or public transport by 2041 (as per Policy T1 of the London Plan).

It is considered the policy should be amended as follows to allow for flexibility "Where the number of housing units on a site is increased by way of apartments, the number of on-site parking spaces can be provided with regard for Local Plan and London Plan policies up to the following maximum standards:"

Policy HW-7: Trees, the natural environment and biodiversity

Part 3 of the policy in respect of tree loss should be re-worded to ensure it is achievable. In some cases, the loss of trees and replacement at a ratio of 2:1 will not be possible, or low-lying shrubs/bushes may be more appropriate in the individual circumstance. It is also unclear how an alternative site in Hadley Wood is to be identified and secured in order to provide off-site tree planting. It is not considered this policy is deliverable as currently worded.

It is suggested part 3 is re-worded to read "Any trees that are lost as a result of development must be replaced on a ratio of at least 2:1 unless demonstrated this is not possible or appropriate, 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.~~

Policy HW-10: New housing development and mix

Whilst there is no requirement for neighbourhood plans to include housing targets, the Neighbourhood Planning PPG states "It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies" and that "neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed".

On this basis, and in light of the significant need for housing within the borough, it is appropriate for the plan to refer to an indicative housing target across the neighbourhood plan area. This should be agreed in discussions with the Local Planning Authority, but should incorporate the Duchy's site land identified within the draft Local Plan as suitable for green belt release. The Duchy consider the capacity of their site between Camlet Way and Crescent West is in excess of the 160 units identified within the draft Local Plan and it's evidence base.

Part 2 of this policy should be amended to read "Provide ~~the maximum viable amount of~~ affordable housing per the national requirements/guidance set out within the NPPF, London Plan and Local Plan." This is to avoid conflict with the affordable housing requirements within the adopted and emerging development plans.

Policy HW-12: High-Quality Built Environment

As set out above, there is a significant need for new homes in Enfield. In light of its draft housing allocation and borough-wide pressure to deliver new homes, it is considered that the policy should be worded flexibly enough to ensure it is viable to deliver new homes in sustainable locations. As such part 4 of the policy should read "Total building height should have regard to ~~must not exceed~~ the prevailing height (from ground level, taking into account topography) in the immediate vicinity".

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 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 Plans, as well as the draft Local Plan and it's recent evidence base. 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 within designation 8, complies with the criteria set out within paragraph 102 of the NPPF, and should be removed from this designation.

Notwithstanding the above, the Duchy support the overall vision of the plan to promote 'good growth' in Hadley Wood. The Duchy would welcome further engagement with the Council and the Neighbourhood Planning Forum to ensure this plan assists in meeting the significant housing needs of the borough. In particular, through recognition of the Duchy's site as a housing allocation and identification of an indicative housing target for the neighbourhood area.

I trust that the above is helpful and we would request we be informed on the draft Neighbourhood Plan process and milestones, including any changes made to the document as a result of this consultation. Please do not hesitate to contact me or my colleague Adam Kindred ([REDACTED]) if you have any queries or comments.

Yours faithfully

Charlotte Everard MRTPI | Senior Planner
CBRE Ltd | UK Development – Planning

Cc: Duchy of Lancaster
Adam Kindred MRTPI | Director

Ismail Mulla

From: LocalPlan
Sent: 10 February 2023 16:08
To: Ismail Mulla
Subject: FW: Hadley Wood Neighbourhood Plan - TfL response

From: Richard Carr <[REDACTED]>
Sent: 10 February 2023 11:40
To: LocalPlan <LocalPlan@Enfield.gov.uk>

[REDACTED]

Subject: Hadley Wood Neighbourhood Plan - TfL response

Thank you for consulting Transport for London (TfL) on the Hadley Wood Neighbourhood Plan. We have the following comments on the submission draft:

Objective 06: Transport

Although we understand the desire to improve local bus services by increasing the frequency of the 399 bus and extending the route to Cockfosters, High Barnet Underground station and Barnet Hospital, these improvements are unlikely to be viable given the limited potential for new development. As noted the area is very car dependent and this mitigates against bus service improvements. It may be better to focus on improving active travel links to enable residents to access more frequent bus services on Cockfosters Road.

Policy HW-4: Off street parking

We do not support this policy which requires a specified level of parking rather than expressing car parking as maximum standards in line with the London Plan. It also allows higher levels of parking than the maximum standards in the London Plan for 3+ bed apartments. It has not been demonstrated through the Local Plan process that there is clear evidence that this would support additional family housing as required by the footnote to Table 10.3 in the London Plan. Indeed it is clear that additional housing in Hadley Wood has generally involved the replacement of larger houses with apartments which are not primarily aimed at providing family housing. To allow more car parking for 3+ bed apartments could perpetuate the existing car dependency, make public transport less viable and active travel less safe and increase traffic congestion within Hadley Wood particularly on Cockfosters Road. In other words it would exacerbate many of the observed problems and would not support additional family housing. In addition the requirement that there are an appropriate number of additional on-site spaces for visitors and deliveries/maintenance workers is contrary to the London Plan which expects visitor spaces to be included within the standard provision. We therefore require the whole policy to be redrafted to refer to maximum car parking standards throughout rather than absolute requirements, to remove the exception for 3+ bed units because it has not been demonstrated that this would support additional family housing, and to remove the reference to additional visitors' spaces. Without these amendments the policy would not be in conformity with the London Plan and the Enfield Local Plan.

Policy HW-18 Active Travel and Aspiration HW(xi): Active travel projects

We support improved opportunities for active travel. We believe a much stronger focus should be on providing improved connections to existing public transport facilities including Hadley Wood rail station and bus services on Cockfosters Road. Improved connectivity could be provided through prioritising the allocation of local CIL funding towards this purpose.

Aspiration HW(xii): Rail and bus services

As stated under Objective 06, although we understand the desire to improve local bus services by increasing the frequency of the 399 bus and extending the route to Cockfosters, High Barnet Underground station and Barnet Hospital, these improvements are unlikely to be viable given the limited potential for new development. As noted the area is very car dependent and this mitigates against bus service improvements. It may be better to focus on improving active travel links to enable residents to access more frequent bus services on Cockfosters Road.

We trust that these points will be addressed and amendments made to ensure consistency with London Plan parking policies before the Neighbourhood Plan is finalised.

Best wishes
Richard Carr

Richard Carr | Principal Planner - Spatial Planning (He/Him/His)
TfL Planning, Transport for London

I work part time and so there may be a short delay in responding to emails

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For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

From: LocalPlan <LocalPlan@Enfield.gov.uk>

Sent: 21 December 2022 10:26

Subject: Submission Draft Consultation on Hadley Wood Neighbourhood Plan (Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)).

Dear Sir or Madam,

We would like to notify you of the Submission Draft Consultation on Hadley Wood Neighbourhood Plan (Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)).

The Plan has formally been submitted by the Hadley Wood Neighbourhood Forum. The consultation runs **between 21 December 2022 and Friday 17 February 2023**.

The Draft Plan and supporting documents can be viewed by following link below:

[Emerging plans | Enfield Council](#)

Hard copies will be available to view at the HWA Centre by the tennis courts, at Hadley Wood Golf Club, at the Paninis café in Crescent West and the Civic Centre, Enfield.

You can email your comments to localplan@enfield.gov.uk, or by post to:

Hadley Wood Neighbourhood Plan Consultation
Strategic Planning and Design
Civic Centre
Silver Street
Enfield
EN1 3XA

Following this consultation, the comments received will be passed to an independent examiner who will consider the representations and recommend whether the draft Neighbourhood Plan should be put to a community referendum.

Please be aware that all representations will be publicly available and may also appear on the Council website through the Independent Examination process.

If you would like to be notified of the Independent Examination outcome on the Draft Plan, please note this as part of your representation.

If you have any questions about the Hadley Wood Neighbourhood Plan, problems accessing the documents or would like updates, email localplan@enfield.gov.uk or call **020 8379 3866**.

We look forward to hearing from you.

Plan Making Team



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David Wilson

E: [REDACTED]

Issued via email: localplan@enfield.gov.uk

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

17 January 2023

Enfield – Hadley Wood Neighbourhood Plan Regulation 16 Submission Version

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

As you may be aware, Thames Water are the water and sewerage undertaker for the Borough and hence are a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

Infrastructure Development - Comments on Water Supply and Wastewater/Sewerage Infrastructure

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

Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.

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).

It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater [and water supply] infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that 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.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Policy CNP13 part 252 should be updated as follows:

“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) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. 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 SUDS

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 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.”***

Development Sites

There are no site allocations for us to comment upon. 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 waste water/sewerage network infrastructure and sewage 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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage 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.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

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

Yours faithfully,



David Wilson
Thames Water Property Town Planner

Ismail Mulla

From: LocalPlan
Sent: 14 February 2023 11:39
To: Ismail Mulla
Subject: FW: Consultation : Draft Hadley Wood Neighbourhood Plan: response of HWA + HWCASG

I've sent an acknowledgement email back to them.

-----Original Message-----

From: Robert Wilson <[REDACTED]>
Sent: 14 February 2023 07:04
To: LocalPlan <LocalPlan@Enfield.gov.uk>

[REDACTED]

Please accept this email as the consultation response of Hadley Wood Association (HWA) and Hadley Wood Conservation Area Study Group (HWCASG) which is supported by HWA.

1. HWA, on behalf of its members (over 350 households), fully supports the Neighbourhood Plan for Hadley Wood, for which the process and content has been under the responsibility of the HWNP Forum Committee.
2. This view is supported by the extensive feedback we have gained from our local planning campaigns, including objections to the proposed amendment of the Local Green Belt (in the Draft Enfield Plan) and successfully opposing the overdevelopment that would have resulted from the Barchester Care Home (23-25 Crescent East) in the setting of the Conservation Area, by HWA and HWCASG with many individual objections.
3. We ask HWNPFC to clarify (correct) references to HWCASG at section 4.41 (and in the Consultation Statement).

We consider that 4.41 should read:

“The Hadley Wood Conservation Area Study Group (HWCASG) is recognised as representing the interests of the Conservation Area in planning matters with its established role on the Conservation Area Group now included in the Enfield Environment Forum. This Neighbourhood Plan strongly supports HWCASG with an Aspiration to strengthen its planning role and encourage community interest in the heritage assets (including the listed buildings), with the full cooperation of HWA and HWNPFC.”

HWA Response last June to the HWNPFC Consultation included:

“We have another established planning group, with a formal role in Enfield Planning through CAG and now Environment Forum: HWCASG (Conservation Area Study Group). The CA is at the heart of our character. HWCASG needs to be recognised and supported (in the Plan).”

We look forward to the successful progress of the HWNP through the next stages of the process to referendum approval. We appreciate the good cooperation of Enfield Council and the commitment of its resources.

Regards

Robert Wilson
Chairman
On behalf of HWA and HWCASG.

Sent from my iPhone

Ismail Mulla

From: LocalPlan
Sent: 17 February 2023 09:20
To: Ismail Mulla
Subject: FW: Hadley Wood NP Reg 16

From: Ben Bowles [REDACTED]
Sent: 15 February 2023 16:23
To: LocalPlan <LocalPlan@Enfield.gov.uk>
Subject: Hadley Wood NP Reg 16

Hi,

Many thanks for the opportunity to comment on the Hadley Wood Neighbourhood Plan consultation. On this occasion HCC have no comment to make.

Please keep us informed of future developments.

Kind Regards

Ben



Ben Bowles
Senior Planning Officer | Growth & Infrastructure | Environment & Infrastructure
Hertfordshire County Council
County Hall, Pegs Lane, Hertford, SG13 8DE, Postal Point: CHN114

T: [REDACTED]

E: [REDACTED]



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Ismail Mulla

From: LocalPlan
Sent: 08 February 2023 09:21
To: Ismail Mulla
Subject: FW: Consultation on the draft Hadley Wood Neighbourhood Plan

FYI. An actual SB response.

From: Janice Burgess [redacted]
Sent: 07 February 2023 19:27
To: LocalPlan <LocalPlan@Enfield.gov.uk>
Subject: Consultation on the draft Hadley Wood Neighbourhood Plan

For the attention of: Strategic Planning and Design Team, Enfield Council

Consultation Topic:

National Highways Tracker ID: 18828

Dear Sir,

Thank you for your email dated 21st December 2022 regarding the Regulation 16 consultation for the draft Hadley Wood Neighbourhood Plan.

National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). Our network is a critical national asset and as such, we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In relation to the Hadley Wood neighbourhood area, the closest section of our network is the M25 (particularly junction 24). The A1 and A1(M) are also near to the neighbourhood area. The plan area is located just south of M25 J24, with the centre of Hadley Wood being approximately 2 miles drive from the junction.

We have undertaken a review of the Neighbourhood Plan, dated December 2022, for which our interests relate to the operation and safety of the SRN. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of the proposals.

We have paid particularly close attention to Section 8 "Access and movement" of the Neighbourhood Plan. This section details the good access to the M25 and remote nature of the area, leading to high car usage levels. There is also a good rail service to central London which appears to be well-used. Walking and cycling facilities in the area are poor however, which further encourages car usage and prevents access to public transport. The Neighbourhood Plan aims to improve walking and cycling facilities by making these a priority use for development CIL funding, through policy HW-18 which we support. National Highways welcomes policy commitments seeking to improve access and take up of sustainable transport, particularly any policy which may off-set strategic car journeys that could otherwise travel on the SRN.

We expect that Neighbourhood Plans comply with National Planning Policy Framework and Guidance, and the strategic policies in the current Enfield Local Plan.


Having reviewed the Neighbourhood Plan, we are content that there will be no specific adverse impact on the safety or efficiency of the SRN as a result of these proposals.

Please do keep us updated with any further consultation on the Neighbourhood Plan or any other relevant policy proposals by contacting us at our inbox: PlanningSE@nationalhighways.co.uk.

Many thanks,

Janice

Mrs Janice Burgess, Spatial Planning Manager
National Highways Limited
Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ
Registered in England and Wales No. 9346363



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Consider the environment. Please don't print this e-mail unless you really need to.

Hertfordshire and North London Neighbourhood Plan Advice Note

Updated: June 2021

Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This document sets out the key environmental issues, within our remit, which should be considered.

We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. This advice note sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/>

Drawing up a neighbourhood plan is a fantastic opportunity to build community resilience to climate change and make the local natural environment better. Opportunities include:

- New green spaces and improvements to public space through new development. This could include planting trees, creating rainwater gardens or enhancing local waterways for water quality and biodiversity.
- Recognising the value of certain environmental features within a plan area, e.g. a floodplain, wetland habitat or rivers. Identify these features and outline how you intend to protect them and improve them.
- Helping a community to manage and adapt to the risk of flooding and climate change by incorporating natural features and green space to manage and store water, and supporting the use of sustainable drainage systems (SuDS).
- Promoting energy and water efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for future occupiers. This will also help reduce unsustainable water consumption and carbon emissions.

We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (<https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies>), and the Thames River Basin Management Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf) as appropriate.

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88

The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.

Infrastructure Delivery

We recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.

Flood risk

Development must be safe and should not increase the risk of flooding.

Neighbourhood Plans should conform to national and local policies on flood risk:

If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations. You can view a site's flood zone on the Flood Map for Planning on our website: <https://flood-map-for-planning.service.gov.uk/>

If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG):

<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>.

Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk taking into account climate change. This should be informed by the Environment Agency's Flood Map for Planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.

If the Neighbourhood Plan proposes development in flood risk areas, the Strategic Environmental Assessment should include baseline information about the flood risks, and include it as a key sustainability issue and as an objective.

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken. It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.

We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at HNLenquiries@environment-agency.gov.uk for further details. In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

Climate Change Allowances

The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change. On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

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Flood Defences

Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

Thames Estuary 2100 (Tidal Defences)

In line with requirements set out in the Thames Estuary 2100 (TE2100) plan, developments in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.

No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases we hold technical drawings of flood defence structures which may be of use. To request these you should contact our Customers and Engagement Team at hnlquiries@environment-agency.gov.uk.

Ecology and Water Management

Proximity to watercourse/ Ecology

Main rivers can be viewed on the Environment Agency's map:

<https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386>

The neighbourhood plan should draw upon evidence of designated or non-designated sites of nature conservation sites of international, national or local importance, and seek to ensure these sites are safeguarded and there is no degradation to these sites. The mitigation hierarchy of avoid mitigate and compensate should be followed to ensure this.

In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering **biodiversity net gain**. The forthcoming Environment Bill will mandate when enacted the demonstration of a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss. The Neighbourhood Plan could identify opportunities to incorporate requirements for achieving biodiversity and wider environmental net gains.

The provision of green infrastructure, particularly along rivers, can bring about benefits for people and wildlife. Creating networks of green space and habitats can also ensure wildlife are able to migrate and move across sites more easily enabling recovery and resilience of different wildlife species. The Neighbourhood Plan could play a role in helping to preserve, safeguard and establish green buffer zones along rivers by including policies or design guidance for their area. Even where buffer zones do not currently exist it is becoming more vital that we create them not just for the benefit of biodiversity but to reduce flood risk and increase our resilience to climate change.

This is a key way in which we can carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.

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Neighbourhood Plans provide an opportunity to promote river restoration and enhancements helping us all to achieve the targets to improve waterbodies as part of the Water Framework Directive (WFD). There should be no deterioration in water quality and development should bring about improvements to the ecological status of any water body. Local WFD catchment data for the rivers in your area can be obtained from: <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/>. We have identified WFD action measures for specific locations or whole reaches of watercourse (e.g. river bank restoration, improving fish passage, etc) and can be obtained from hnlenquiries@environment-agency.gov.uk on request.

Objectives to achieve WFD improvements across all sectors are outlined in the Thames River Basin Management Plan (RBMP) (<https://www.gov.uk/search?q=River+Basin+Management+Plans>).

An assessment of the potential impacts of the Neighbourhood Plan on watercourses under WFD should be included within the SEA/SA appraisal, making use of the datasets available above.

Groundwater Quality

Development must not cause pollution to the water environment.

Aquifers and Source Protection Zones

Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

To see if a proposed development is located within a Source Protection Zone, please use our online map:

<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

Land Contamination

You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.

You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed on the following link:

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/198-doe-industry-profiles>

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

Your plan may include areas which are located on aquifers and Source Protection Zones. These areas represent the most sensitive and highest risk in terms of potential pollution to protected groundwater supplies, some of which are used for drinking water. These should be considered within your plan if growth or development is proposed here. Further information can be accessed on the following links:

Guiding principles for the Land Contamination

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/192-guiding-principles-for-land-contamination-gplc>

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Approach to Groundwater Protection:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf

Water supply and foul drainage

When allocating sites in your Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity. Our '[Water Stressed Areas – final classification](#)' 2013 explains that our area is seriously water stressed. This is particularly significant as population numbers rise and there are increased impacts from climate change on water resource availability and reliability. The Neighbourhood Plan should consider what further measures could help the local area achieve water sustainability that are not already in the Local Plan, water efficiency standards and measures including the retrofitting of existing buildings.

Surface water drainage

The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and improving water quality.

The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.

We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at: <https://www.gov.uk/government/collections/groundwater-protection>

The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Please note

This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site. You should seek your own expert advice in relation to technical matters relevant to your neighbourhood plan before submission.

If you have any questions please contact the Hertfordshire and North London Sustainable Places team: HNL Sustainable Places@environment-agency.gov.uk

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Date: 17 February 2023
Our ref: 417083
Your ref: Hadley Wood Neighbourhood Plan



Plan Making Team
Enfield London Borough Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

localplan@enfield.gov.uk

Dear Sir/Madam

Hadley Wood Neighbourhood Plan – Regulation 16 Consultation

Thank you for your consultation on the above dated 21 December 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on the Hadley Wood Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully

Sally Wintle
Consultations Team



Hadley Wood Neighbourhood Plan Consultation
Strategic Planning and Design
Civic Centre
Silver Street
EN1 3XA Enfield

localplan@enfield.gov.uk
by email only

Our ref: PL00712762

17 January 2023

Dear Hadley Wood Neighbourhood Plan Consultation,

Ref: Hadley Wood Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

We would be grateful if you would notify us on LondonPlanningPolicy@HistoricEngland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Nina Dierks
Business Officer
E-mail: [REDACTED]





HADLEY WOOD
— GOLF CLUB —

Enfield Council
Civic Centre
Silver Street,
London
EN1 3XA

Friday 24th February 2023

Dear Madam / Sir,

I refer to the Hadley Wood Neighbourhood Plan consultation and wish to record that, consistent with other neighbourhood plans, the HWNPF agreed in February to remove the land owned by Hadley Wood Golf Club from the proposed Local Green Spaces, on the basis that it fails to meet the requirements.

Regards



Michael Edwards
Chair, Hadley Wood Golf Club

Hadley Wood L
Email:



Subject: Re: URGENT; Submission draft consultation on Hadley Wood Neighbourhood Plan (HWNP)
Date: Tuesday, 14 March 2023 at 14:30:32 Greenwich Mean Time
From: [REDACTED]
To: 'LocalPlan'
CC: hadleywoodnp@gmail.com
Attachments: 2023-03- Landscape character assessment- Habitats-final revised2.pdf

-

The Manager,
Hadley Wood Neighbourhood Plan
Consultation
Strategic Planning and Design
Civic Centre
Silver Street
Enfield
EN1 3XA

[REDACTED]

14 March 2023

Email: LocalPlan@enfield.gov.uk

Cc. The Secretary, Hadley Wood Neighbourhood Forum Committee: Email:
hadleywoodnp@gmail.com

Dear Madam or Sir,

Re: URGENT; Submission draft consultation on Hadley Wood Neighbourhood Plan (HWNP) (Regulation 16) of the Neighbourhood Planning (General) Regulations 2012 (as amended); Draft further response from Interested Persons,; Supplementary notes and attached files

We are writing to the Forum as Interested Persons with further comments and clarification, as promised in our Regulation 16 Consultation response, dated **17/02/2023**. We are concerned to add additional comments and observations on principles and proposals in the Submission draft (Hadley Wood) Neighbourhood plan, as follows:

- A revised edition of [title: Heritage and Habitats study- revision, Rev03b], baring minor corrections and amendments;
- To detail supplementary notes concerning the Walking/ Cycle route, proposed in the submission draft plan, 'Figure 33', page 14, 'Connection along Monken Mead Brook to Hadley Highstone'.

A matter to detail and clarify concerns 'Plantation Wood', shown in 'Figure 3', page 14, *Heritage and Habitats study* (Incorrectly referred to as 'Figure 2', page 14 in Rev03a, see Rev03b- revised edition attached), see below.

Plantation wood is identified in public Environmental records as being a habitat not yet held to qualify under Section 41, Natural Environment and Rural Communities Act 2006, but with a high potential to do so. It is understood that the woods are inaccessible and appear to be under maintained, though with a potential to make accessible, see documents referred to in Response by Interested Persons, copy attached and *Heritage and Habitats* study and local planning policy and guidance: Herts County Council; *Rights of Way Improvement Plan*, 2017/2018 and:

Watling Chase Community Forest SPG

For example key objective of the Community Forest SPG, referred to in the Consultation response: Creating new opportunities for nature conservation; protecting areas of high quality landscape and significantly increasing opportunities for sport and recreation and improving access to the countryside. Also providing new opportunities for the educational use of the area, whilst protecting the best agricultural land and increasing opportunities for farm diversification, of which Plantation Woods may form part and establishing a supply of timber and other woodland products.

Excerpt from HERC Ecological Network Mapping (database excerpt), 'Plantation Wood'

tiseID	Hab Cat No	HabDescNow	HabTypeNow
0753	2	Existing habitat not currently qualifying under S41 NERC Act	Mixed woodland - plantation

Source: HERC (Hertfordshire Environmental Records Centre), 2022(b); *Herts Ecological Network Attributes 202209_043* [Excel spreadsheet]

Walking and Cycle routes: waymarking and interpretation; Viewpoints- Barnet Road, (see 'Figure 3', rev01b *Heritage and Habitats* study Rev03b)

Local planning policy and guidance, to provide waymarking and interpretation as public recreational and amenity matters:

- Finger posts and interpretation of walks, including mobile ICT linked options, like QR code and or viewpoint interpretation lectern/s/ viewpoint panorama/s/ optiscope, from Barnet Road. For example near the junction with Wagon Road and further west along the public pedestrian footway, flanking Barnet Road.
- At the locations illustrated in Figure 3, rev01b above, clear views are possible from

public pedestrian footway, including: Hadley Wood and surrounding neighbourhoods.

- In the east Enfield, where River Lea valley is visible, in what 17th century poet Drayton, refers to as the 'Leas delightful brook', (Drayton, 1611 and Hutton 1903 in Cook, 2023).
- In the south east and south, New and High Barnet and London, with sweeping views of towers of Canary Wharf and Cities of London and Westminster. Here a viewpoint panorama interpretation lectern/ optiscope, could be applicable, see amended Figure 3, rev01b, page 14, in *Heritage and Habitats study Rev03b*.
- Sequential views of Hadley Wood and the area believed to be characteristic of Hadley Wood and within the estimated zone of visual influence of HW Conservation Area 'Key View' Crescent West. The former landscape is shown in 'Figure 6', submission draft plan. This sequential experience may be significant for persons travelling on foot, cycle or motor cycle/ vehicle, for example along Barnet Road and Wagon Road, in addition to views from within the Neighbourhood area. The latter three may illustrate encounter of the landscape at high speed, more of a modern experience, at least since invention of and widespread use of railways, cycles and cars, (Fairbrother, 1967; LI/ IEMA, 2013).

Hertfordshire Environmental Records Centre, HERC

The work refers to HERC Ecological Network Mapping, for the estimated Zone of Visual influence for HW Conservation 'Key View', at Crescent West, Hadley Wood, Enfield, (Cook, 2023).

HERC offer a specialist service for Neighbourhood Planning Forums. To explore this, a request must be made directly to HERC, see contact details below:

<u>HERC Contact Details</u>	HERC
Email: enquiries@hercinfo.org.uk	Grebe House
Phone: 01727 732767	St Michael's Street
	St Albans
	AL3 4SN

We request our representation to be taken into account and comprises supplementary documents and notes. We would like to reserve the right to reply in more and be kept informed of developments. This response is provided for information only and no liability will be accepted.

Yours faithfully,



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References:

ENCS.

Cook, A.C., 2023; *Hadley Wood Landscape Character- Heritage and Habitats Rev02b* [study]

Fairbrother, N., 1967., *New Lives New Landscapes*, Harmondsworth Pelican Penguin Books

LI/ IEMA, 2013; *Guidelines for Landscape and Visual Assessment.*, 3rd edition. Abingdon
Routledge

Adam Cook BA honours DipLA MSc CMLI



ate', 2021; Elected as 'Associate of the Royal Town Planning



The Manager,
Hadley Wood Neighbourhood Plan
Consultation
Strategic Planning and Design
Civic Centre
Silver Street
Enfield
EN1 3XA

16 February 2023

Dear Madam or Sir,

Re: Response from Interested persons; Submission draft consultation on Hadley Wood Neighbourhood Plan (HWNP) (Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended))

We are writing to Strategic Planning & Design as *Interested Persons* in response to the above Consultation and in relation to the principles set out in:

London Borough of Enfield, *Statement of Community Involvement in Planning, 2021*: Figure 7: Key stages in Neighbourhood Planning; Stage 4 Submission of a Neighbourhood Plan/Order.

The basis for the concerns raised are that comments and observations were issued in response to the Regulation 14 (R 14) consultation on draft HWNP by the Neighbourhood Forum and that further clarification is now requested, in relation to comments and the Submission draft HWNP above. Thus on the basis of: Neighbourhood plan 'basic conditions' tests, in National Planning Policy Framework, 2021 (NPPF, 2021), paragraph 35, pages 11-12:

- (a) Having regard to national policies and advice from the Secretary of State, Department of Levelling Up Housing and Communities, it is appropriate to make the order
- (b) Have special regard to desirability of preserving any listed building or its setting or any feature of special architectural or historic interest.

- (c) Has special regard to desirability of preserving or enhancing the character and appearance of any conservation area.
- (d) The making of the order will contribute to sustainable development.
- (e) In general conformity with the strategic policies in the development plan of the local authority or any part of that area.
- (f) Compatible with retained EU obligations.
- (g) Prescribed conditions met in relation to order and practical matters complied within specific proportions for the order

On the basis of the above tests, whilst the draft *Submission HWNP* may adopt a spatial and conceptual approach that offers a strategic perspective of the neighbourhood, there may be a need to consider sectoral and enabling measures. This is to accommodate the thematic principles in relevant local plans, policy and current draft local plan, in relation to the draft *Submission HWNP*. In planning terms particularly where Green Belt policy designation are considered, for example with focus on openness and Local Green Space (LGS), there is a possible need to refer to cross boundary impacts, policy and plans.

On this basis we would like enclosed comments, observations and evidence to be taken into account, in the report prepared for the Examiner, on the *Submission draft HWNP*.

As Interested Persons, we request to be kept expressly informed of progress in the matter and reserve our right under the principles of the above SCI in relation to engagement and inclusion in planning. No liability will be accepted and independent legal advice should be taken on any matter of law. We look forward to your reply.

Yours faithfully,



ENCS. Interested Persons, Comments and observations above; Cook, A., 2023; *Hadley Wood Landscape Character - Heritage and Habitats Study, 2023* document

Comment issued on behalf of **Interested Persons**

This document is submitted to a Regulation 16 public consultation, on the Submission draft Hadley Wood Neighbourhood Plan, 2022, hereinafter, the 'Submission Plan'. This follows issue of response under HW Neighbourhood Forum consultation on the draft Hadley Wood Neighbourhood Plan, (Regulation 14), June 2022. The Regulation 16 consultation is conducted under, The Neighbourhood Planning Regulations (SI 2012/ 637) and National Planning Policy Framework, 2021. paragraph 35- setting out 'basic conditions' tests for a neighbourhood plan and:

LB Enfield, *Statement of Community Involvement in Planning*, 2021; 'Figure 7: Neighbourhood plan making, 'Key Stages in Neighbourhood Planning; Stage 4: Submission of Neighbourhood Plan/ Order.

HW, Submission Neighbourhood Plan 2022 (Submission Plan/ NP)- comments form				
Number	Policy/ page being referred to Item/ sub- heading	Comment and grounds	Change requested (as per LBE SCI, 2021)	Evidence/ Reference
1	HW- C1 Setting and Character Figure 6, 'semi- rural setting of Hadley Wood(...)', (Page 25), Views: 1, 2, 5, 6 and 7. [Views suggested to characterise the setting of HW.]	Interested Persons response to the Consultation on Hadley Wood Neighbourhood Plan (Regulation 14) raised the matter of 'impact cross-boundary', (page 6) For example the <i>Submission Plan</i> , <i>Figure 6</i> may need to illustrate important views that may lie in the scope of setting of the NP for example south from Barnet Road to HW. These are likely to be	For example: Where new access is proposed making reference in the NP, to relevant HBC/ LBB policies in the area/s affected by the Plan should be considered. For example to include cross references to published objectives for rights of way relating Herts CC	BCS criteria: Local and national policy Response by Interested Persons (above), Hadley Wood Neighbourhood Plan (Regulation 14), July 2022. TCPA 1990 (as amended) Para. 8; Sch. 4B; (1) and (2) NPPF 2021, para. 146

	<p>Figure 33, 'Suggested active travel projects(...)'</p>	<p>significant in relation to proposed new Active travel projects access contained in the Submission NP, <i>Figure 33</i>, page 84 and in relation to policy for areas of proposed new access for example: Herts CC; <i>Rights of Way Improvement Plan- 2017/18</i> and Hertsmere BC Local Plan ?2012 and WCCF SPG.</p> <p>There is new access proposed in the <i>Submission Plan</i> which traverses the boundary with LBB and bisects into Hertsmere BC areas, which no reference is included in the <i>Submission Plan</i>. The grounds for this question is that much of the above area lies outside the designated neighbourhood area and in the areas covered by <i>Watling Chase Community Forest SPG</i>, see</p>	<p>connections to Enfield, (Herts, 2017):</p> <ul style="list-style-type: none"> <input type="checkbox"/> Maintenance and management – removing vegetation and clearing litter. <input type="checkbox"/> Information, marketing and promotion of the network. <input type="checkbox"/> Improvements: provision of lighting and improving surface condition. <input type="checkbox"/> Create new routes and new links to connect to the existing network and provide circular routes. <p>For example proposed opening of new Pedestrian/ Cycle access to Barnet Road may offer to connection to sites in Community Forest/ Woodland covered in Enfield Chase Restoration Programme and new access to woodland in proximity of HW Plantation Wood/ London Lodge</p>	<p>Documents referred to in NWNP Consultation Statement 2022, (Regulation 14):</p> <p>Site SA45' Local Site Landscape Study and draft Figures 8 and 9 'Site SA45' Local Site Landscape Character Study'. Figure 8. <i>Statement of Common Ground</i> between LB Enfield and LBB, February 2022. <i>Statement of Common Ground</i> between LB Enfield, Hertsmere BC and Hertfordshire CC, July 2022. <i>Watling Chase Community Forest SPG 2001/ 2012</i> (first adopted Additional documents <i>Enfield Chase Restoration Programme</i> Herts CC; <i>Rights of Way Improvement Plan- 2017/18 – 2027/28</i>, July 2017</p>
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		<p><i>Figure 2, HW Landscape character; Heritage and Habitats study, 2023.</i></p> <p>For example, see Evidence list/ references</p> <p>Policy for HCC/ HBC are thus relevant to these areas and are no obvious references contained, in the <i>Submission Plan</i></p>	<p>Wood, <i>Submission Plan, Figure 6 and 33 and Figure 2 and 3, HW Landscape Character-Heritage and Habitats study, 2023.</i></p>	<p>LB Enfield, 2021., Review of LBE Biodiversity Action Plan, 2021</p>
2	<p>HW- C2 Trees, the Natural Environment and Biodiversity</p>	<p>Referring to comment on behalf of Interested in the Regulation 14 consultation on the draft Neighbourhood Plan, June 2022, recorded in the HWNP Consultation Statement, 2022, NMDC, 202, Biodiversity design principles are recorded, pages 37-38 and hedges are valued as policy objective, in the neighbourhood, in the <i>Submission Plan</i> (HW-2, page 30) and as part of Local Green Space (LGS8, page 132), there may be need to</p>	<p><u>Enfield Local Plan; Hedgerow management principles</u></p> <p>Themes of Hedge, 'Planting and Maintenance and thus particularly relevant to the neighbourhood and its hedges</p> <p>The above document is referred to in LB Enfield, Core Strategy 2010-2025, in paragraph 8.28, Streetscape Policy and Guidance.</p>	<p>BCS criteria</p> <p>The Hedgerow Regulations 1997</p> <p>LB Enfield, <i>Streetscape Policy and Guidance, Volume 2</i>, Approved March 2012.</p> <p>Historic England guidance on important hedgerows</p> <p>Hertfordshire Ecological Network Mapping report, 2022</p> <p>Hadley Wood Landscape, Heritage and Habitats study, 2023</p>

		<p>account for these in the <i>Submission Plan</i>, in particular in the area in the draft estimated ZVI of Site SA45 and other areas in the neighbourhood and its wider setting, see <i>Figures 6 and 33</i>, the <i>Submission Plan</i> and <i>Figure 3 and 5</i>, Hadley Wood Landscape Character - Heritage and Habitats Study, 2023.</p>	<p>Require a Hedgerow and Woodland/ Arboricultural Studies</p>	
3	<p>HW- HD2 High- quality built environment</p>	<p>The HWNP Consultation Statement 2021 states that 'HW Character has been better defined', page 34. The New Model Design Code (NMDC) 2021 was mentioned in the published report HWNP Consultation Statement 2021, page 37-38, in response to consultation response, during the HW Regulation 14 consultation.. Whilst there is no reference to the NMDC 2021 in the <i>Submission Plan</i>. NMDC 2021 has status as</p>	<p>It would be preferable to include a reference to NMDC 2021, on matter like building setback, buffer zones and biodiversity design principles in the Neighbourhood Plan.</p>	<p>Hadley Wood Neighbourhood Plan (HWNP) Consultation Statement, 2021 NPPF, 2021, para. 110(c), page xx New Model Design Code (NMDC), 2021</p>

		<p>National Planning Guidance in NPPF 2021, para. 110(c), The context of HW may suggest that building setback, buffer zones and Biodiversity Design principles are particularly relevant to HW and for this reason the guidance in the NMDC 2021 is of significance and for this reason, should be included in the Neighbourhood Plan.</p>		
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