

Development Management Document
Part of Enfield's Local Plan

**Schedule of Representations &
Enfield Council's Response**

January 2014

Rep. No	Section or Policy / Rep.no/ Representor No. and Name	Is the DPD Sound / legally compliant (N/S = Not Stated)	Comments on the Proposed Submission DMD	LBE Response	LBE Proposed Changes to the DMD
Whole Plan					
1.	Whole Plan/02/001 02 – Individual	N/S	General comments related to processes outside of the DMD. Neither a comment of support or objection to the document.	Noted.	No change.
2.	Whole Plan/10/001 10 - Highways Agency (HA)	N/S	The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the Strategic Road Network (SRN). At this time the HA do not have any comment to make.	Noted.	No change.
3.	Whole Plan/13/001 13 - Southgate District Civic Trust (SDCT)	Support	SCDT have concentrated on DMD 1 - 88, and Appendix 4, 5 & 6 regarding Standards for New Development. We support the policies therein and hope that until the document is adopted the policies proposed will be used as	Noted.	No change.

			assessing current as well as future planning applications because they are policies that have always been relevant in our opinion.		
4.	Whole Plan/18/001 18 – Natural England	Support	Natural England welcomes the fact that the comments made in our last communication with Enfield (dated 27th July 2012) now form part of the Sustainability Appraisal (SA). The fact that these have been integrated into the SA as mentioned is encouraging as all the aspects of the NPPF, such as paragraph 118, are thus covered.	Noted.	No change.
5.	Whole Plan/23/001 23 – Lea valley Regional Park Authority (LVRPA)	Unsound	The LVRPA considers the Proposed Submission DMD to be unsound as there is no policy within the document to help guide appropriate development within the Park. This undermines the effectiveness of the DMD and the future deliverability of strategic priorities around North East Enfield, Central Leaside and Meridian Water and opportunities for joint working in relation to the Park. The Authority welcomes the support	The DMD is not the appropriate local plan document to set out individual site specific policies. Enfield’s adopted Core Strategy incorporates specific priorities for the future development of the Park (Core Policies 11, 35, 37, 38, 40, 41) and support for the Park Development Framework. In addition to this, DMD 89 recognises Picketts Lock located within the LVRP as a major site within the Green Belt and provides guidance	No change.

			<p>provided for the Regional Park at a strategic level in the Core Strategy and will be seeking the incorporation of more detailed site specific proposals in Area Action Plans and Planning Guidance. However it is still necessary to include development management policy guidance for the whole Park area within Enfield (approximately 653 hectares) to ensure that the Park's leisure and ecological resources are both protected and appropriately developed in accordance with its remit and the recently adopted Area proposals.</p>	<p>accordingly. Similarly other DMD policies within the submission document address development guidance for such matters as ecology, waterways, and green infrastructure. Where appropriate, other emerging Local Plan documents, specifically the Central Leaside Area Action Plan as noted by the LVRPA, will cover the level of detail sought from the proposed LVRPA policy put forward in this representation.</p>	
Chapter 1 Introduction					
6.	<p>Paragraph 1.3.2.1 Para. 1.3.2.1/33/001 33 – Broomfield Home Owners and Residents Association (BHORA)</p>	N/S	<p>The following references are cited under Section 1.3.2 Sustainable Development Text Box :</p> <p><i>“The Council will always work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possibly ...”</i></p> <p><i>“Planning applications that accord with policies in The Enfield Local Plan</i></p>	<p>The wording reflects the presumption in favour of sustainable development as adopted in national policy. The DMD has been developed as a positively prepared Plan in order to respond to, and be in conformity with, the National Planning Policy Framework.</p> <p>Development Management case</p>	No change.

			<p><i>documents will be approved without delay”</i></p> <p><i>Where there are no policies relevant to the application ... the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</i></p> <ul style="list-style-type: none"> <i>• Any adverse impacts in granting permission would significantly and demonstrably outweigh the benefits ...”</i> <i>• Specific policies in that Framework indicate that the development should be restricted.”</i> <p>The representation is concerned that the above wording tips the balance in favour of applicants and will make it difficult to object successfully. Representation questions how objections will be heard and whether these applications all be treated as Certificates of Lawfulness.</p>	<p>officers and Planning Committee will continue to consider all representations made on individual planning applications and any other material considerations related to specific proposals.</p>	
--	--	--	--	--	--

Chapter 2 : Housing

7.	<p>Chp 2 / 31 /001</p> <p>31- Planning Potential on behalf of Fairview New Homes.</p>	N/S	<p>Request that when the Council is examining viability appraisal assessments submitted by developers (on a confidential basis), it should provide a high level of transparency on their findings of the submitted appraisal. A justification for the findings of the viability assessment should also be provided.</p>	<p>Noted, although the issue raised by the representation sits out the local plan making process.</p>	No change.
8.	<p>DMD 1 Affordable Housing</p> <p>DMD 1/16/001</p> <p>16 – Greater London Authority (GLA)</p>		<p>Proposed submission document is not in conformity with the London Plan in respect of affordable housing, in particular in relation to paragraphs 2.13 and 2.1.4.</p> <p>Paragraph 2.1.3 – Enfield Council has not supplied any evidence to support the following statement: “but could also impact on the affordability for low income families. Those in receipt of benefits will be particularly affected by the current proposed welfare reform</p>	<p>The key considerations in terms of Affordable Rented Tenure affordability for Enfield residents remains, particularly the need to provide affordable family homes. Paragraphs 2.13 and 2.14 reflect Enfield’s local affordability needs. The issues were discussed with the GLA prior to Proposed Submission. The Council continues to work with the GLA in setting out Enfield’s local affordability evidence and will work with the GLA to establish areas of</p>	No Change

		<p>proposals which would cap the total amount of benefits received depending on employment status making this tenure less affordable". Many of those on benefit will not be affected by the benefit cap because they are in work or of pensionable age, moreover welfare reform will impact on a wide range of people, not just those in affordable rent. The statement should therefore be deleted.</p> <p>Paragraph 2.1.4 – The paragraph details what the borough suggests is affordable for local residents and could be interpreted as attempting to cap rents. The London Plan and the Revised Early Minor Alterations are clear that rent caps should not be imposed as they impede the maximisation of affordable housing delivery. They could restrict the overall numbers of units delivered for viability reasons, which would be contrary to the intent of the NPPF and out of general conformity with the London Plan Policy 3.11. The GLA Affordable Homes Programme for 2011-2015 is ensuring that affordable rent family housing is at</p>	(un) common ground.	
--	--	--	---------------------	--

			or near target rent; this is a matter for housing investment rather than planning policy. To avoid rent caps being imposed via planning policy, it is suggested that the entire paragraph 2.1.4 be deleted.		
9.	DMD 1 Affordable Housing DMD 1 /30/001 30 – Graham Fisher on behalf of A C Nicholas	N/S	The policy should explicitly state that a lower level of affordable housing will be accepted when development viability justifies it. There should be the following criterion added ac ‘c. <u>“ the financial viability of the proposed development”</u> The policy should also be amended as follows; <u>‘Subject to requirements to provide a contextual and sustainable design and the management requirements of the registered social landlord, tenure should be spread throughout the development to prevent concentrations or clear distinction.</u>	DMD 1 in conjunction with the adopted Core Strategy, London Plan and NPPF provide sufficient flexibility with regards to feasibility and viability. Changes are therefore not considered necessary.	No change.
10.	DMD 1 Affordable Housing DMD 1/31/ 002		Agree with principle of well integrated cohesive mixed tenure residential development proposals, although have	DMD 1 does not prescribe how tenure should be integrated which allows for appropriate solutions to	No change.

	31- Planning Potential on behalf of Fairview New Homes.		concerns over management issues. Request clarification on how to manage issues that arise from integration of arise with the integration of social and private accommodation.	be developed based on the overall scheme, types of units proposed and on a site by site basis. The detail of which will be negotiated agreed at a planning application between the Council, private developer and registered social provider.	
11.	DMD 1 Affordable Housing DMD 1/33/002 33 – Broomfield Home Owners and Residents Association (BHORA)	N/S	Clarify what is meant by “Intermediate”	The glossary provides a detailed description of “intermediate housing”.	No change.
12.	Paragraph 2.1.4 Para.2.1.4/30/002 30 – Graham Fisher on behalf of A C Nicholas	N/S	Final sentence should amended to read <u>‘subject to site constraints and development viability</u> , developers will be expected to provide a mix of housing types including family sized homes, in line with Core Policy 5 and DMD Policy 3’.	DMD 1 in conjunction with the adopted Core Strategy, London Plan and NPPF provide sufficient flexibility with regards to feasibility and viability. Changes are therefore not considered necessary.	No Change.
13.	DMD 2 Affordable Housing for Development of less	N/S	This policy should be prefaced with the words <u>‘Subject to development</u>	DMD 2 in conjunction with Core Policy 3 provides sufficient	No change.

	<p>than 10 units</p> <p>DMD 2/30/003</p> <p>30 – Graham Fisher on behalf of A C Nicholas</p>		<p><u>viability...'</u></p>	<p>flexibility with regards to feasibility and viability issues. Paragraph 2.1.8 was previously amended to respond to comments raised during the Draft consultation stage and now includes a specific reference to viability. Paragraph 2.1.7 was also amended to refer to the potential for alternative provision.</p>	
14.	<p>DMD 2 Affordable Housing on sites of less than 10 units</p> <p>DMD 2/ 31/003</p> <p>31- Planning Potential on behalf of Fairview New Homes.</p>		<p>Viability is a key indicator for a scheme as to whether it is able to be delivered, especially on smaller schemes. It is important that the Local Authority provides an opportunity for an applicant to deliver a potentially lower target if it can be demonstrated that it would not be viable for the proposal to come forward if such a target were unachievable, a requirement of the NPPF (paragraph 173).</p>	<p>DMD 2 in conjunction with Core Policy 3 provides sufficient flexibility with regards to feasibility and viability issues; Paragraph 2.1.8 was previously amended to respond to comments raised during the Draft consultation stage and now includes a specific reference to viability. Paragraph 2.1.7 was also amended to refer to the potential for alternative provision.</p>	<p>No change.</p>
15.	<p>DMD 3 Providing a Mix of Different Sized Homes</p> <p>DMD 3/ 30/004</p> <p>30 – Graham Fisher on</p>	<p>N/S</p>	<p>This policy should be prefaced with the words <u>'Subject to site constraints'</u>.</p>	<p>Technical and physical constraints may not be relevant on all sites; however the guidance on implementation in paragraphs 2.2.4 and 2.2.6 sets out developers must demonstrate why they cannot</p>	<p>No change.</p>

	behalf of A C Nicholas			achieve targets and will take into account the specific nature of the site such as its location and its overall suitability for different housing types. DMD 6 takes into account existing character when assessing appropriate density levels.	
16.	DMD 3 Providing a Mix of Different Sized Homes DMD 3/31/ 004 31- Planning Potential on behalf of Fairview New Homes.	Support	DMD 3 goes on to state that developers should take a design led approach to maximise the provision of family units. This is an element that we wholeheartedly support where appropriate and relative to a site's context. It is in line with paragraph 57 in the NPPF.	Noted.	No change
17.	Paragraph 2.2.6 Para 2.2.6/30/005 30 – Graham Fisher on behalf of A C Nicholas	N/S	Replace the word 'evidence' with ' <u>a justification</u> '.	The word 'evidence' is considered to be appropriate.	No change.
18.	Paragraph 2.3.3 Para 2.3.3/30/006 30 – Graham Fisher on	N/S	The final sentence is too prescriptive and should be deleted.	The policy approach and supporting text provide an appropriate level of clarity over the Council's expectations in assessing any loss	No change.

	behalf of A C Nicholas			of residential units.	
19.	DMD 5 Residential Conversions DMD 5/ 30/007 30 – Graham Fisher on behalf of A C Nicholas	N/S	The figure of 20% in criterion b. is arbitrary and too prescriptive. It is contrary to London Plan Housing SPG that advises that locally restrictive policies, including those based on ‘conversion quotas’ should not be applied along transport corridors or within reasonable walking distance of a town centre without a robust justification. Criterion 2 should be prefaced with ‘Where the constraints of the site and the character of the locality permit...’	The 20% threshold and 1 out of a consecutive row of 5 is a local standard that the Council would apply to assess whether the development would result in an excessive number or cluster of conversions that would affect the character of a street/road. Further clarity on what is considered ‘adequate’ is provided in supporting text in paragraph 2.3.9 and other supporting DMD policies such as DMD 45 Parking Standards and Layouts.	No change.
20.	DMD 5 Residential Conversions DMD 5/33/003 33 – Broomfield Home Owners and Residents Association (BHORA)	N/S	The representation seeks clarity over whether the 20% in criterion b is a London Plan standard and further clarity on what is considered “adequate” parking as stated in criterion d.	The 20% threshold and 1 out of a consecutive row of 5 is a local standard that the Council would apply to assess whether the development would result in an excessive number or cluster of conversions that would affect the character of a street/road. Further clarity on what is considered ‘adequate’ is provided in supporting text in paragraph 2.3.9	No change.

				and other supporting DMD policies such as DMD 45 Parking Standards and Layouts.	
21.	DMD 6 Residential Character DMD 6/ 30/008 30 – Graham Fisher on behalf of A C Nicholas	Unsound	The second sentence of the first paragraph should be amended to read: “Development will only be permitted if it complies <u>in general</u> with the London Plan density matrix and the following criteria are met...”	The additional wording adds greater ambiguity and is not considered appropriate.	No change.
22.	DMD 6 Residential Character DMD 6/31/005 31- Planning Potential on behalf of Fairview New Homes.	N/S	Criterion e. of Policy DMD 6 states that “the density of development takes into account the existing and planned provision of local facilities such as shops, public and private open space, and community, leisure and play”. This element should be subject to further scrutiny. It is possible to offset the impact of development with the provision of social infrastructure as part of Section 106 agreement. We consider that the Council should recognise within the wording of this policy that, although the density of development should take into account the local provision of social infrastructure, new development is a	Noted. DMD 6 was previously amended to include a reference to both ‘existing and planned’ provision of local facilities.	No change.

			fundamental contributor of this provision, and should not ignore future provision.		
23.	DMD 6 Residential Character DMD 6/33/004 33 – Broomfield Home Owners and Residents Association (BHORA)	N/S	BHORA consider proposals with the North Circular Area Action Plan do not comply with DMD 6. The word “appropriate” is often used, but question who is to decide if a development is “appropriate”? Representation also questions justification for exceeding the London Plan densities.	Noted, however, the issues related to the North Circular Area Action Plan (AAP) will be considered via the AAP’s examination and not through the DMD. Individual applications would also need to comply with DMD 38 and justify, through Design and Access Statements, the design proposal including the rationale behind the proposed density.	No change.
24.	Paragraph 2.4.2 Para 2.4.2/33/005 33 – Broomfield Home Owners and Residents Association (BHORA)	Comment	Reference is made to the Characterisation Study of 2011 which “... highlights key issues which need to be addressed including areas where inappropriate “densification” is detrimental to the character of the place.” Representation considers this evidence base has not been applied to the North Circular Area Action Plan.	Comments are noted, however, the issues related to the North Circular AAP, but in particular to the consideration of individual planning applications will be considered via the AAP’s examination and the planning application process.	No change.
25.	DMD 7 - Development of Garden Land	Support	The LPA has significantly changed the policy wording in the proposed	Noted.	No change.

	DMD 7/13/001 13 – Banner Homes		Submission Draft. There is now no presumption against development on garden land. A criteria based policy is proposed, informed by character, amenity space etc. This revised approach is more pragmatic and I have no further comments to make at this stage.		
26.	DMD 7 - Development of Garden Land DMD 7/ 33/006 33 – Broomfield Home Owners and Residents Association (BHORA)	N/S	For developments within the North Circular Area Action Plan (NCAAP) these considerations appear to have been waived through the approval of planning application.	Noted, however, the issues related to the North Circular AAP are to be considered via the AAP's examination and the planning application process.	No change.
27.	DMD 8 General Standards for New Residential Development. DMD 8/30/009 30 – Graham Fisher on behalf of A C Nicholas	Unsound	This policy is too prescriptive. The first sentence should read: New residential development will only normally be permitted if all of the following relevant criteria are met. All development must should: The individual criterion should read as follows:	The suggested changes in wording are not considered to add any additional clarity to the policy approach.	No change.

			<p>d. Normally meet or exceed minimum space standards in the London Plan and London Housing Design Guide</p> <p>e. Provide a well-designed, flexible and functional layout, with adequately sized rooms in accordance with having regard to the London Housing Design Guide.</p>		
28.	<p>DMD 8 General Standards for New Residential Development.</p> <p>DMD 8/ 31/ 006</p> <p>31- Planning Potential on behalf of Fairview New Homes.</p>	Unsound	<p>Criterion f. states that “all units should meet Lifetimes Homes Standards”. This is not always physically possible or viable. Therefore it may not be possible to meet all 16 criteria as set out in the revised 2010 standards. The policy should be reworded to enable the Council to apply this standard flexibility if it can be demonstrated that is not possible for it to be achieved. Request inserting the following text prior to part f. “unless it can be demonstrated” in order for developers to justify the position of the proposals.</p>	<p>The ability of development to meet the criteria as set out in DMD 8 will be determined on an individual scheme basis and during the planning application stage process. The standards provided in DMD 8 establish a benchmark of the Council’s expectations on achieving high quality homes in line with local and London Plan policy.</p>	No change.
29.	<p>DMD 8 General Standards for New Residential Development.</p>	N/S	<p>This in the view of BHORA is vital and new residential properties should be of the same height as neighbouring properties and any buildings they</p>	<p>Noted. DMD 8 does not specify the height of new/replacement buildings in relation to neighbouring properties. This issue</p>	No change.

	DMD 8/ 33/008 33 – Broomfield Home Owners and Residents Association (BHORA)		replace.	would be taken into account on a site by site basis so that the specific context of a site can be considered on its own merits. The standards provided in DMD 8 establish a benchmark of the Council’s expectations on achieving high quality homes in line with local, London Plan and national policy.	
30.	DMD 9 Amenity space DMD 9/30/010 30 – Graham Fisher on behalf of A C Nicholas		Criterion b. should read: Is <u>not significantly</u> overlooked by surrounding development... Criterion d. should be deleted.	Criterion b. relates to communal amenity space and not private amenity space. Communal space generally benefits from being overlooked as a means of natural surveillance. Criterion d. is considered appropriate, communal space should be managed in order to be maintained to benefit long term enjoyment. However, for clarity the Council acknowledge a change is more appropriate within 1) .	See focused change (FC .1) in Addendum.
31.	Paragraph 2.4.17 Para 2.4.17/30/011		This should be amended as follows: “The minimum requirement will <u>normally</u> represent an acceptable	The addition of the words <u>“normally”</u> is not considered appropriate. A minimum standard	No change.

	30 – Graham Fisher on behalf of A C Nicholas		standard of provision on all sites, but there will be cases where new development will be required to provide more amenity space, such as when the development is within an area with identified open space or play deficiencies, or where amenity space makes a greater contribution towards setting and the character of areas, having regard to Conservation Area Appraisals and the Characterisation Studies. However, any units which are below the minimum standard will not normally be acceptable.	of provision is necessary to ensure that any amenity space provided is functional.	
Chapter 3 – Community Facilities					
32.	DMD 16 – Provision of Community Facilities DMD 16/14/001 14 – Theatres Trust	Support	Support DMD 16 as it will provide for new community facilities and paragraph 3.1.1 includes culture and arts facilities.	Noted.	No change.
33.	DMD 16 – Community Facilities DMD 16/20/001	N/S	DMD 16 states that new community facilities will be supported borough-wide and will be required as part of development within the Strategic	Second paragraph of DMD 16 has been amended to provide additional clarity.	See focused change (FC. 2) in Addendum.

	20 – Planning Potential on behalf of Scottish Widows		Growth Areas (SGAs). The requirement related to developments in Strategic Growth Areas is unclear, unreasonable in parts and does not fully accord with Core Strategy Policies 7, 8 and 11.	PPMC 2: “New community facilities will be supported borough-wide and may will be required as part of development, within the strategic growth areas, as detailed within Local Plan documents and the Infrastructure Delivery Plan (IDP) to ensure the creation of prosperous, sustainable communities.....”	
34.	DMD 16 – Community Facilities DMD 16/ 31/009 31- Planning Potential on behalf of Fairview New Homes.	N/S	DMD 16 states that new community facilities will be supported borough-wide and will be required as part of development within the Strategic Growth Areas (SGAs). The requirement related to developments in SGAs is unclear, unreasonable in parts and do not fully accord with Core Strategy Policies 7, 8 and 11. There is no evidence or explanation of why developments should provide such uses, what they should be or whether they would be found acceptable given	See LBE response to Rep No. 33 Above.	See focused change (FC. 2) in Addendum.

			the tests in Policy DMD 16. In these respects, the policy is unsupported and incapable of proper implementation or interpretation as neither the applicant nor the LPA is informed of what is required, where and why.		
35.	DMD 17 Protection of Community Facilities DMD 17/14/002 14 – Theatres Trust	Support	Support as it will protect community facilities, and provides criteria for the evening economy.	Noted.	No change.
36.	DMD 17 Protection of Community Facilities. DMD 17/15/001 15 - Metropolitan Police Service (MPS) & Mayor’s Office for Policing and Crime (MOPAC)	Support	The MOPAC support criterion a. of this policy which allows the loss of a community facility where a suitable replacement facility is provided that maintains the same level of public provision and accessibility.	Noted.	No change.
37.	DMD 17 Protection of Community Facilities. DMD 17 / 26/ 002 26 - LFEP Edmonton/Enfield &	N/S	In both policies DMD 16 and DMD 17 emergency services are included as examples of community facilities however; fire fighting facilities are classed as community facilities but often	Noted, however paragraph 3.1.1 does list and detail examples of community facilities. “Emergency services and policing facilities <u>accessible to the public</u> ”	No change.

	Southgate Fire Stations.		not accessible to the public.	Further clarity is not considered necessary.	
38.	Paragraph 3.1.9 Para.3.19/15/002 15 - Metropolitan Police Service (MPS) & Mayor's Office for Policing and Crime (MOPAC).	Unsound	The MOPAC object to the requirement at paragraph 3.1.9 that evidence will be required of marketing. This conflicts with the Policy which highlights either the provision of a replacement facility or evidence of marketing. Suggested change: Paragraph 3.1.9 - The loss of facilities will be allowed only in exceptional circumstances. <u>Where a suitable replacement facility that meets the criteria at DMD 17a isn't provided and the loss doesn't form part of a published publicly consulted upon estate strategy,</u> evidence will be required of marketing and consultation with the community to demonstrate that there is no demand for existing or alternative community uses.	The suggested change is specific to the requirements of the MOPAC. Generally the requirements to evidence marketing and consultation with the community will be applicable in most circumstances. Where 'other' forms of evidence are available, such as an Estate Strategy, the policy and paragraph 3.1.9 provide flexibility for this consideration.	No change.
Chapter 4 – Enfield's Economy					
39.	Chapter 4 Enfield's Economy	Unsound	The DMD's employment policies are too restrictive in seeking to protect traditional employment type uses and	The DMD's retail and employment policies are considered to provide sufficient flexibility to enable	No change.

	<p>Chp. 4/29/001</p> <p>29 – Ikea Properties Investment Ltd</p>		<p>fails to recognise the valuable contribution retail makes to the economy. The NPPF in Annex 2 lists main town centres (excluding housing) in defining economic development. “Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment” (paragraph 21 of the NPPF), in particular the NPPF states:</p> <p>“support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances”.</p>	<p>adaption to future needs of existing businesses and new investment.</p>	
40.	<p>DMD 19 – Strategic Industrial Locations</p> <p>DMD 19/20/002</p> <p>20 – Planning Potential on</p>	Object	<p>Scottish Widows Investment Partnership – owners of Ponders End Industrial Estate and Graftongate (development Partner). Only recently become involved in this site.</p>	<p>The de-designation of SIL at the southern part of the estate was accepted as part of the Core Strategy adoption in 2010.</p> <p>The DMD does not provide any</p>	No change.

	behalf of Scottish Widows		Object to southern part of Ponders End Industrial Estate being removed from SIL.	further evidence to justify re-designating the southern part of the estate back to SIL notwithstanding the change in ownership.	
41.	DMD 19 – Strategic Industrial Locations DMD 19/15/003 15 - Metropolitan Police Service (MPS) & Mayor’s Office for Policing and Crime (MOPAC).	Unsound	MPOAC’s previous representation sought flexibility in allowing certain sui generis uses, such as policing uses with similar characteristics to B Class Uses, to be supported on SIL’s and PIL’s which may assist in the MOPAC meeting their Estate Strategy objectives.	DMD 19 refers to type of uses appropriate for SIL and not use classes. Any such proposals would be assessed alongside relevant policies including London Plan policies.	No change
42.	DMD 19 Strategic Industrial Locations DMD 19/22/001 22 – Network Rail (NR)	N/S	Throughout the country Network Rail is developing schemes that allow for the retention of existing B Uses but additionally incorporate other use(s) above e.g. residential accommodation. This allows Network Rail to maximise their assets which fundamentally provide an income that is reinvested back into railway infrastructure. Representation recommends that an additional section is added to Policy DMD19 which states that provided the	Suggested change is not considered necessary. SIL is principally designated for employment generating uses, therefore, the request to include flexibility to accept non- employment generation uses on Network Rail land is not considered appropriate and would be in conflict with London and Local Plan policies.	No change.

			existing B Use is retained, mixed uses schemes will be considered within these strategic industrial locations, many of which are allocated adjacent to Network Rail land.		
43.	DMD 19 Strategic Industrial Locations DMD 19/30/012 30 – Graham Fisher on behalf of A C Nicholas	N/S	Should be amended to recognise sui generis uses are also suitable on SIL. In addition sui generis is also suitable at Great Cambridge Road Industrial Business Park and Locally Significant Industrial Sites.	There is sufficient flexibility provided at criterion c. in DMD 19 and criterion 2b in DMD 20 which recognises ‘other employment generating uses’.	No change.
44.	DMD 19 Strategic Industrial Locations DMD 19/32/001 32 - LaSalle Investment Management on behalf of Stonehill Business Park	Unsound	The word “only” has been added to the DMD 19 which is more restrictive making the policy unsound in that it is not ‘positively prepared’, nor effective in supporting the local and wider economy and meeting the Council’s regeneration objectives. Again the policy also states that: “Proposals involving the loss of industrial capacity will be refused.” Equally this is not positively prepared or effective. Suggested change: “Proposals involving the loss of industrial capacity will be resisted <u>unless other</u>	The addition of the word “only” sought to clarify the position on those uses specifically supported within Preferred Industrial Locations (PIL). Equally, the strong protection of industrial capacity in PIL is considered a sound approach consistent with Core Strategy and London Plan policy. Therefore the suggested change to delete the word ‘only’ is not accepted. Reinserting the previously deleted earlier 2012 Draft DMD paragraph of supporting text is accepted to	See focused change (FC. 3) in Addendum.

		<p><u>planning or regeneration objectives are met”</u></p> <p>In our previous representations we also noted support for the inclusion of paragraph 5.2.1 in the supporting text of the policy, which stated:</p> <p>“The main focus within SILs is on uses categorised under the "B" use classes (B1, B2 and B8). The Council recognises that there are a greater number of uses of a similar nature that can also locate and function successfully within these industrial areas.”</p> <p>This text provided flexibility of uses within the SIL and recognised that the success of industrial areas may be improved through a more flexible approach. However, this paragraph has now been deleted from the Submission Version Document. Its removal renders the policy unsound, as it is not positively prepared or effective in its delivery. This paragraph should be re-inserted to ensure that the policy is flexible and allows proposals which optimise a site and contribute to the wider regeneration</p>	<p>provide the flexibility and clarification sought.</p> <p><u>“The main focus within SILs is on uses categorised under the "B" use classes (B1, B2 and B8). The Council recognises that there are a greater number of uses of a similar nature that can also locate and function successfully within these industrial areas , as broad industrial type activities as defined in the London Plan and the Mayor’s SPG on Land for Industry and Transport (2012).”</u></p>	
--	--	--	---	--

			<p>of the area. This will bring the policy into alignment with the NPPF and ensure the policy is sound.</p> <p>In accordance with this, and the need to retain some flexibility within the SIL policy, we consider that Paragraph 4.2.2 should not only refer to the Great Cambridge Industrial Business Park as a location for ‘other employment generating uses’. Rather, this location should be used as an example of sites that may suit these uses. Stonehill Business Park, with its North Circular frontage may be similarly appropriate for such uses and therefore the policy should not preclude this. We therefore consider that this text is not in accordance with the NPPF and should not be considered ‘positively prepared’.</p>		
45.	<p>DMD 21 Complementary uses within SIL and LSIS.</p> <p>DMD 21/20/003</p> <p>20 – Planning Potential on</p>	Object	<p>Supportive of Part 1 and generally supportive of Part 2. However, the maximum of 10% retail is unrealistically low and a figure of 25% is suggested.</p>	<p>A more flexible figure of 25% is not accepted and would undermine the intended ‘ancillary’ element such uses perform. The policy approach accepts some flexibility to the provision of supporting trade</p>	No change.

	behalf of Scottish Widows			counter / direct sales uses at 10%, however the primary function of a use is intended to remain within Class B1, B2 and B8, with the objective of maintaining an appropriate balance of uses within designated SILs	
46.	DMD 21 Complementary uses within SIL and LSIS. DMD 21/32/002 32 - LaSalle Investment Management on behalf of Stonehill Business Park	Unsound	Restricting the retail element to 10% in criterion 2a of this policy is too prescriptive. The NPPF focuses on the deliverability and viability of schemes, and without some manoeuvrability, this policy would not be consistent with national policy. In some cases, provision of more than 10% of retail floorspace may be required for the development to be viable, and may ensure other regeneration objectives are met. In order for the policy to be found sound, we suggest that part 2a of the policy is amended to the following: “The retail element does not become the dominant use, allowing for <u>circa</u> 10% of	As above.	No change.

			the overall floorspace of the unit.”		
47.	DMD 22 Loss of employment Outside Designated Areas DMD 22/30/013 30 – Graham Fisher on behalf of A C Nicholas	N/S	Suggested change: “Proposals involving a change of use that would result in a loss or reduction of employment outside of Strategic Industrial Locations (SIL) or Locally Significant Industrial Site (LSIS) will be refused, unless it can be demonstrated that the site is no longer suitable and or viable for its continued use”.	The change is not accepted as both tests of non-suitability and non-viability need to apply as part of the consideration to accepting the loss of employment uses.	No change.
48.	DMD 22 Loss of employment Outside Designated Areas DMD 22/31/010 31- Planning Potential on behalf of Fairview New Homes.	Support	Support the approach taken by the Local Authority within DMD22. Specifically, Fairview concur with the inclusion of paragraph 4.6.4 and Appendix 13 which outlines the criteria applicants must demonstrate in order to assess the loss of employment land. However, suggest that the Local Authority include commentary within DMD Policy 22 to consider that, “ where there is no reasonable prospect of a site being used for the allocated employment use, and then applications for alternative uses of land or buildings	Noted.	No change.

			<i>should be treated on their merits. This should have regard to market signals and the relative need for different land uses to support sustainable local communities”.</i>		
49.	Paragraph 4.5.3 Para 4.5.3/ 30/014 30 – Graham Fisher on behalf of A C Nicholas	N/S	This paragraph imposes an onerous burden and should be deleted.	Market demand and viability assessments are required to prevent the loss of employment uses outside of designated areas. The requirements are not considered to be overly onerous and are supported by Core Strategy and London Plan Policy. The inclusion of this paragraph is considered to provide clarity over the Council’s expectations in considering such proposals.	No change
50.	DMD 23 – New Employment Development. DMD 23/20/004 20 – Planning Potential on behalf of Scottish Widows	Soundness	“1a) There is no adverse impact as a result of noise and disturbance, access, parking and servicing in the area”; By virtue of being designated SIL or LSIS it has already been established that industrial development within the area would not have an adverse impact as a result of any of the reasons set out in	The comments made on criterion 1a are not accepted; industrial sites do not sit in isolation of other land uses and often are in close proximity to residential areas. Given this, the diversity of uses and the operational requirements of businesses accommodated within SIL and LSIS it remains important	See focused change (FC 4) in Addendum.

			<p>criterion a.</p> <p>“1b) The accommodation is flexible and suitable to meet future needs and requirements of local businesses and small firms, where appropriate”.</p> <p>Suggest 1b) is deleted as industrial buildings may need to be designed to meet operational need and as a bespoke building would not be flexible or suitable for the needs of others. While the words ‘where appropriate’ are included, suggest criterion be deleted because it is a clear requirement that all criteria must be met.</p>	<p>that DMD 23 sets out the appropriate considerations.</p> <p>Criterion 1b allows sufficient flexibility by virtue of stating “where appropriate” and therefore its deletion is not supported.</p>	
51.	<p>DMD 23 – New Employment Development.</p> <p>DMD 23/32/003</p> <p>32 - LaSalle Investment Management on behalf of Stonehill Business Park</p>	Unsound	<p>Criterion 1b of the policy should not be limited to the requirements of local businesses or small firms. Sites should provide accommodation that is demanded by the market, in accordance with the NPPF.</p> <p>Consider the last paragraph of part 1 to be unsound. As worded, it is not consistent with national policy, as it does not take viability into account and does not allow for proportionate contributions</p>	<p>Criterion 1b ensures flexibility to enable adaptation to future needs while allowing a response to the particular local and site circumstances through the wording “where appropriate”.</p> <p>Similarly “where appropriate” is also used to provide flexibility on expected contributions for environmental and traffic</p>	See focused change (FC 4) in Addendum.

			<p>depending on the size of development. Paragraph 173 of the NPPF states:</p> <p>“The sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”</p> <p>It is clear that obligations and policy burdens should be appropriate, proportionate and consider the viability of a development. We suggest that the final paragraph of part 1 of policy DMD23 is changed to reflect this:</p> <p>“Proposals for industrial development within SIL and/or LSIS will be expected to contribute <u>proportionately</u> to environmental and traffic improvement schemes for that industrial location, where appropriate and <u>subject to viability considerations</u>”</p>	improvement.	
52.	<p>DMD 24 – Small Businesses</p> <p>DMD 24/32/004</p> <p>32 - LaSalle Investment Management on behalf of</p>	Unsound	<p>There is no allowance for development that would result in the loss of small business units, where it also achieves other important planning and regenerative objectives. This policy</p>	<p>Applications involving the loss of employment uses will also be accompanied by a market demand analysis and viability assessment to justify the loss. Where wider</p>	No change.

	Stonehill Business Park		<p>would also prevent the loss of small business units even where robust evidence is provided to show that there is no demand for this type of employment accommodation.</p> <p>Therefore, we consider that this policy is not positively prepared. There is no flexibility or wider consideration of the planning benefits that may result in the loss of the small business units. We suggest that the wording of the policy is amended to:</p> <p>“Proposals involving the loss of units of less than 50 sqm suitable for start-ups and small business <u>will generally be resisted unless other considerations indicate otherwise.</u> Proposals for the loss of small business units should demonstrate either:</p> <p><u>a) A lack of demand for the unit through the provision of robust marketing evidence; or</u></p> <p><u>b) Wider regeneration objectives can be met through their loss.”</u></p>	<p>regeneration benefits are accepted to outweigh the loss of small business accommodation, these will be justified and evidenced through other relevant local plan policies that will be established through area action plans?</p>	
--	-------------------------	--	---	--	--

Chapter 5 Town Centres					
53.	Table 5.1 Table 5.1/14/003 14 – Theatres Trust	Support	Support including sui generis types in Table 5.1 and the Glossary.	Noted.	No change.
54.	DMD 25 - Locations for New Retail, Leisure and Office Development. DMD 25/19/001 19 - Universities Superannuation Scheme	Unsound	Text should be amended to reflect the NPPF. Re-word policy DMD25 as follows: 1. Locations for New Retail, Leisure and Office Development a. Main and bulk convenience, comparison shopping, food and drink uses and major leisure and office development. i. New development will be permitted within Enfield Town and the borough's four district centres. ii. If no sites are suitable or available within the town centres listed in part a. i.	DMD25 continues to be NPPF Compliant. NPPF still promotes a town centres first approach which is the approach in DMD 25. Changes to DMD 25 1(a) accepted in full. Changes to DMD 25 1(a)(ii) accepted in full. Changes to DMD 25 1(a)(iii) accepted only in part, a revision to the text is set out in PPMC 5. Changes to DMD 25 1 (a) (iv) not accepted. Picketts Lock remains a key leisure destination and it is appropriate to include this point within the Policy. DMD 25 1(a)(v) Deletion not accepted under	See focused change (FC 6) in Addendum Changes to DMD 25 made in response to Rep nos. 54, 55, 56 and 57. 19 - Universities Superannuation Scheme (Rep no. 54) 24 – Savills of behalf of Legal & General and National Grid (Rep no. 55) 28 - Ikea Properties investment Ltd. (Rep no.

		<p>of this policy for the development proposed, then retail development at edge of centre locations that are well connected to and up to 300 metres from the primary shopping area will be permitted.</p> <p>iii. New development within the boundary of the Council's existing retail parks of Enfield retail park, DeManderville Gate, Ravenside and Angel Road (as defined in the Core Strategy and on the Policies Map) and outside of the town centres will only be permitted if the applicant can demonstrate to the Council's satisfaction that a sequential test has been applied which shows no suitable sites available within or on the edge of the town centres.</p> <p>Furthermore, a retail impact assessment should demonstrate that the development is not likely to have a negative impact to the viability and vitality of Enfield's centres or planned investment in centres and that the development increases the overall sustainability and accessibility of the</p>	<p>the representation, however text has been reworded in response to representation made be Legal & General.</p> <p>Changes to DMD 25 1(b) accepted in full.</p> <p>Changes DMD 25 2. General considerations for town centre development – The deletion of criteria 2a. “ The proposed use supports town centre vitality and viability” is not accepted considered appropriate.</p>	<p>56).</p> <p>32 - LaSalle Investment Management on behalf of Stonehill Business Park (Rep no. 57)</p>
--	--	---	--	---

		<p>retail park in question. <u>that a sequential test has been applied which shows that there are no suitable sites for the proposed development that are available within or on the edge of the centres detailed in part i. of this policy. Furthermore, that a retail impact assessment undertaken in accordance with NPPF Paragraph 26 demonstrates that the development is not likely to have a significant adverse impact on one or more of the factors specified in that paragraph of the NPPF.</u></p> <p>iv. <u>Proposals for leisure development in Picketts Lock will be permitted if a sequential test has been applied to demonstrate the location is the most appropriate for the proposed use.</u></p> <p>v. <u>Development outside of the locations set out in parts a – d of the policy above will not be permitted.</u></p> <p><u>1 b. Local Shopping Facilities</u> Proposals for new retail (A1) and A2-5 uses, leisure and other community uses of a scale which provide local shopping facilities and services for communities will be permitted within the boundaries of large local centres, small local centres and local parades, as defined on the</p>		
--	--	--	--	--

		<p>Policies Map. Proposed retail development outside of centres will be refused. <u>Proposals located elsewhere will be determined in accordance with part 1.a.iii. of this policy.</u></p> <p><u>2. General considerations for town centre development</u> Development will be permitted provided that all of the following criteria are met:</p> <p>a. The proposed use supports town centre vitality and viability;</p> <p>b. The design and siting of the development promotes visual continuity with the surrounding built environment;</p> <p>c. The proposed use does not harm the character, appearance and amenity of the area;</p> <p>d. The residential amenities of local residents will not be harmed by way of noise, disturbance, loss of daylight or privacy;</p> <p>e. The proposal will not have an adverse impact on safety and traffic flows or unacceptably add to traffic and parking problems in the area;</p> <p>f. The scale of parking is proportionate to the size of the development; and</p> <p>g. An active frontage is achieved at the ground floor.</p>		
--	--	--	--	--

55.	<p>DMD 25 - New Retail, Leisure & Office Development.</p> <p>DMD 25/24/001</p> <p>24 – Savills of behalf of Legal & General and National Grid</p>	Unsound	<p>The Policy is not consistent with national policy set out in Framework.</p> <p>Proposed retail developments outside of defined centres/parades will be refused. There is no flexibility to consider out of centre retail or leisure development on appropriate sites. Paragraph 24 of the Framework states that:</p> <p>“Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered”.</p> <p>Paragraph 6.63 of the Core Strategy explains that depending on the implementation of other foodstore proposals near the Borough boundary there may be a requirement for food store development between the period 2015-2020. Furthermore, the Council’s</p>	<p>DMD25 continues to be NPPF Compliant. NPPF still promotes a town centres first approach which is the approach in DMD 25.</p> <p>Changes to DMD 25 1(a) (ii) accepted in part here and at 1(a) (v) through revised text in response to sites identified within Area Action Plans.</p>	<p>See focused change (FC 4) in Addendum .</p> <p>Changes to DMD 25 made in response to Rep nos. 54, 55, 56 and 57.</p> <p>19 - Universities Superannuation Scheme (Rep no. 54)</p> <p>24 – Savills of behalf of Legal & General and National Grid (Rep no. 55)</p> <p>28 - Ikea Properties investment Ltd. (Rep no. 56).</p> <p>32 - LaSalle Investment Management on behalf of Stonehill Business Park (Rep no. 57)</p>
-----	---	---------	--	---	---

		<p>Retail Study Update (2009) states that “higher population growth within the SGA’s (medium or high) could generate scope for food store development between 2020 and 2025, particularly in the Southgate area.”</p> <p>In a relatively dense area such as Enfield there are limited opportunities for foodstore development in sequentially preferable locations (the Retail Study identified very few such opportunities) and a foodstore could not realistically be accommodated in vacant retail units or infill development. Whilst the Western Gateway site is not within or on the edge of a town centre, it is well related to New Southgate station (and ‘small local centre’ as identified in your Core Strategy) and is in existing retail use. The Western Gateway is clearly a highly sustainable location.</p> <p>The policy should be amended to read: Locations for New Retail, Leisure and Office Development: a. Main and bulk convenience, comparison shopping and major leisure and office development</p>		
--	--	---	--	--

		<p>i. New development will permitted within Enfield Town and the borough's four district centres.</p> <p>ii <u>In accordance with the sequential test</u>, if no sites are suitable or available within the town centres listed in part a. of this policy, then retail development at edge of centre locations that are well connected to and up to 300 metres from the primary shopping area will be permitted. <u>If there are no edge of centre sites available then out of centre sites will be considered. Retail, Leisure and Office Development will also be considered within development sites identified within the Area Action Plans.</u></p> <p>iii. New development within the boundary of the Council's existing retail parks of Enfield retail park, De Manderville Gate, Ravenside and Angel Road (as defined in the Core Strategy and on the Policies Map) will only be permitted if the applicant can demonstrate to the Council's satisfaction that a sequential test has been applied which shows no suitable sites available within or on the edge of the town centres. Furthermore, a retail impact assessment should demonstrate that the development is not likely to</p>		
--	--	---	--	--

			<p>have a negative impact to the viability and vitality of Enfield's centres or planned investment in centres and that the development increases the overall sustainability and accessibility of the retail park in question.</p> <p>iv. Proposals for leisure development in Picketts Lock will be permitted if a sequential test has been applied to demonstrate the location is the most appropriate for the proposed use.</p> <p>v. Development outside of the locations set out in parts a – d of the policy above will not be permitted.</p>		
56.	<p>DMD 25 - New Retail, Leisure & Office Development</p> <p>DMD 25 / 28/002</p> <p>28 – CgMs on behalf of Ikea Properties investment Ltd.</p>	Unsound	<p>DMD 25 considered too restrictive and therefore not consistent with greater flexibility given in NPPF. In particular sub paragraph 5 where any out of centre retail beyond town centres and edge of centre sites or within the 3 specified retail parks will not be permitted. This paragraph should be deleted or reworded.</p>	<p>DMD25 continues to be NPPF Compliant. NPPF still promotes a town centres first approach which is the approach in DMD 25.</p> <p>DMD 25 has however been revised in response to representations 54 and 55</p>	<p>See focused change (FC 4) in Addendum .</p> <p>Changes to DMD 25 made in response to Rep nos. 54, 55, 56 and 57.</p> <p>19 - Universities Superannuation Scheme (Rep no. 54)</p> <p>24 – Savills of behalf of Legal & General and National Grid (Rep no. 55)</p>

					<p>28 - Ikea Properties investment Ltd. (Rep no. 56).</p> <p>32 - LaSalle Investment Management on behalf of Stonehill Business Park (Rep no. 57)</p>
57.	<p>DMD 25 - Locations for new Retail, Leisure and Office Development</p> <p>DMD 25/32/005</p> <p>32 - LaSalle Investment Management on behalf of Stonehill Business Park</p>	Unsound	<p>As worded, Policy DMD25 restricts new development to within 300m of the primary shopping area. However, this distance is arbitrary and prevents sites coming forward which can demonstrate through an impact assessment that a location beyond this is appropriate. Should there be a site beyond this 300m distance, which a sequential impact test can demonstrate is appropriate for new development, permission should be granted.</p>	<p>The use of the distancing of 300m allows for a walking distance of less than 5 minutes from the primary shopping area of a town centre. Providing a distance allows for proposals to remain accessible and connected to the town centre, as set out in paragraph 23 on the NPPF.</p>	No change.
58.	<p>DMD 28 – Local Centres and Local Parades and Proposals</p> <p>DMD 28/17/001</p> <p>17 - Wildstone Planning On</p>	Unsound	<p>The Oakwood Large Local Centre, as defined on the proposals map currently excludes Trent Park Golf Club. The current boundary ignores the fact that the Golf Club and its ancillary facilities</p>	<p>The boundary reflects DMD evidence base and is considered NPPF compliant.</p>	No change.

	behalf of Trent Park Golf Club		operate as part of the Local Parade with linked trips occurring between the two. The Golf Club's car park is also utilised by people using the Oakwood Parade. It is considered that that the Plan is currently unsound and the boundary of the Oakwood centre needs to be altered to include the Golf Club car park and clubhouse.		
59.	DMD 32 – Managing the Impact of Food and Drink Establishments DMD 32/17/002 17 - Wildstone Planning On behalf of Trent Park Golf Club	Unsound	The proposed policy is currently inflexible in that it only permits food and drink uses within identified centres. This fails to acknowledge that there are circumstances where food and drink uses are appropriate outside of centres such as at Golf Clubs or other sporting facilities and in its current form the Policy is unsound and unjustified. Provided that proposals meet the criteria based part of the policy then there is no reason why they should not be acceptable. The wording of the Policy should therefore be changed from the current “will only be permitted” to enable further discretion and individual sites’	Agreed to delete the word “only” in criterion 1 to acknowledge the degree of flexibility sought from Rep nos. 59 and 60. Additionally agreed to a minor change at point 4. “1. Development involving the establishment of food and drink uses (A3, A4 and A5 – inclusive) will only be permitted in the following locations:.....” “4. Development involving hot food takeaway (A5) uses, <u>or uses with a significant A5 element</u> on sites located within 400 metres of an existing or proposed secondary school boundary entrance will not be permitted.....”	See (FC 7) in Addendum.

			circumstances to be considered (i.e. the word “ normally ” or “ typically ” should be inserted).		
60.	DMD 32 - Managing the Impact of Food and Drink Establishment. DMD 32/24/002 24 – Savills on behalf of Legal & General and National Grid.		Want greater flexibility in terms of the location of food and drink establishments i.e. in Area Action Plan locations. This is not in accordance with the sequential test set out in paragraph 24 of the NPPF. A3, A4 and A5 uses are defined in the NPPF as ‘main town centre uses’, therefore, as currently drafted the policy is potentially unsound as it is not consistent with national policy. The DMD policy should be amended to allow some flexibility in terms of the location of food and drink uses. Suggest deleting the word ‘only’ within Part 1 of the policy.	Agreed to delete the word “only” to acknowledge the degree of flexibility sought from Rep nos. 59 and 60.	See (FC 7) in Addendum.
Chapter 6 Design and Heritage					
61.	DMD 37 - Achieving High Quality Design DMD 37/09/001	Support	EH welcome the amendments to DMD 37 and inclusion of paragraph 6.1.3.	Noted.	No change.

	09 – English Heritage (EH)				
62.	DMD 37 - Achieving High Quality Design Development. DMD 37/ 33/008 33 – Broomfield Home Owners and Residents Association (BHORA)	N/S	Whether or not something is inappropriate is a matter of subjective judgement or taste. The public must be involved from the outset in deciding what is needed. Taking the North Circular Action Plan as an example, this is why the public finds itself at odds with planners. In this example, the public does not understand why they are compelled to have blocks of flats when other London boroughs (Barking and Greenwich come to mind) are demolishing blocks and building terraced houses with gardens.	Noted. However, the principal objective of DMD 37 applies and the Council has a duty to provide housing to meet a range of housing needs and therefore housing types. There are a significant number of households that do not require and could not afford terraced housing. The remaining part of this representation relates to detailed planning applications and the North Circular Area Action Plan.	No change.
63.	DMD 38 - Design process DMD38/09/002 09 – English Heritage	N/S	EH note that policy DMD 44 includes a reference to Heritage Statements. However EH suggest that paragraph 6.1.8 could be amended to highlight the need, when appropriate, of contacting other statutory organisations for pre-application advice. <u>“Where appropriate early discussions with relevant statutory consultees such</u>	Agree to insert the additional advice as suggested.	See (FC 8) in Addendum.

			<p><u>as English Heritage on major heritage issues, is also encouraged”.</u></p> <p>This is particularly important for larger schemes, or where potential conflicts with adjoining sites or between different policy objectives are foreseen.</p>		
64.	<p>DMD 38 - Design & Heritage</p> <p>DMD 38/20/005</p> <p>20 – Planning Potential on behalf of Scottish Widows</p>	Unsound	<p>The requirement for Design & Access Statements is beyond the remit of this policy, particularly at Parts 1 and 2 of the policy. Material weight being given to the advice of design review panels under Part 3 is also beyond the remit of this document. DMD 38 should be deleted.</p>	<p>Draft DMD 2012 did not include point 3 however inclusion was in response to publication of NPPF)</p> <p>The NPPF (para 62) requires local authorities to have design review arrangements in place, and that they have regard to their recommendations in making decisions. The DMD reinforces this point.</p> <p>The policy clarifies what the Council considers is necessary to demonstrate that the objectives of the Design & Access Statement have been met. The requirements are not considered to be too specific. Text was added to reinforce this within the policy: “The scope and level of detail</p>	No change.

				contained in the Design and Access Statement should be proportional to the type of development being proposed.”	
65.	DMD 38 - Design and Heritage DMD 38/30/015 30 – Graham Fisher on behalf of A C Nicholas	N/S	Criterion 2 is overly onerous and should be amended to read: The Design and Access Statements must meet national requirements and include: <u>should meet national requirements as set out in relevant legislation and circular advice.</u>	The suggested revision would delete sub-criteria (a-c) and would not provide the level of clarity the criterion specifically seeks to set out for planning applications. The Policy is intended to ensure Design and Access Statements are useful.	No change.
66.	DMD 38 - Design and Heritage DMD 38/ 31/ 011 31- Planning Potential on behalf of Fairview New Homes.	Soundness	It is beyond the remit of local policies to stipulate the content of Design & Access statements. With reference to Part 3 - Design Review Panels, it is not the role of the document to give material consideration status to the view of a body which is undefined and to which applicant’s cannot adequately understand or respond. DMD 38 should, therefore, be deleted.	Draft DMD 2012 did not include Part 3, however, it was introduced in response to the publication of the NPPF. In practice, during the consideration of planning applications material weight is given to recommendations of Design Review Panels, therefore, the principles of the DMD 38 reflect this. The policy clarifies what the Council considers is necessary to demonstrate that the objectives of the Design & Access Statement	No change.

				have been met. The requirements are not considered to be too specific. Text added to reinforce this in the policy: "The scope and level of detail contained in the Design and Access Statement should be proportional to the type of development being proposed."	
67.	DMD 38 - Design and Heritage DMD 38/33/009 33 – Broomfield Home Owners and Residents Association (BHORA)	N/S	The public has to be involved. Our recommendation is that qualified members of the public should be included on the Design Review Panels.	Membership criteria for the Design and Review Panel would not exclude suitably qualified / experienced individuals from being involved.	No change.
68.	Paragaph 6.1.11 Para 6.1.11/30/016 30 – Graham Fisher on behalf of A C Nicholas		This goes beyond national requirements and should be deleted.	The requirement for Design and Access statements to assess proposals against criteria in DMD 37 is considered entirely reasonable and should ensure Statements are meaningful. Applications will be assessed against all Local Plan policies therefore placing the assessment within a Design and Access Statement continues to be a	No change.

				<p>logical requirement.</p> <p>The paragraph is appropriately cross referencing to relevant policy objectives within the DMD that will also be a consideration in the design review process.</p>	
69.	<p>DMD 39 - The Design of Business Premises</p> <p>DMD 39/02/006</p> <p>20 – Planning Potential on behalf of Scottish Widows</p>	Unsound	<p>The Policy is excessively onerous. For example, if a business promotes industrial investment but requires a bespoke operational design that is unlikely to be flexible it would fail criterion f, and therefore fail the whole policy.</p>	<p>Additional flexibility by deleting the word “all”.</p> <p>However also note additional flexibility is provided in second sentence of paragraph 6.2.3.</p> <p>“In applying the standards, the Council will have regard to the operational requirements of the business and viability”.</p>	See (FC 9) in Addendum.
70.	<p>DMD 39 - The Design of Business Premises.</p> <p>DMD 39/33/010</p> <p>33 – Broomfield Home Owners and Residents</p>	N/S	<p>At h) it talks of ensuring “... buildings being made visually interesting through architectural detailing.”</p> <p>This implies the use of architects. Hopefully these are Enfield’s own and</p>	<p>The Council has no control over the contracting of architects for third party development schemes.</p>	No change.

	Association (BHORA)		will be allowed to use their imagination for the borough's benefit, rather than to rely on those engaged by sub-contracted developers.		
71.	DMD 41 - Advertisements DMD 41/01/001 01 - Outdoor Media Centre	Object	Object to the blanket ban on internally illuminated signs, box fascias or projecting signs in Conservation Areas. Policy considered unduly restrictive and contrary to the Control of Advertisements Regulations 2007 which requires all advertisements proposals to be considered on their individual merit. No justification provided for a blanket ban of all advertisements of certain types and/ or within a certain area.	Text was amended via previous comments received at Draft DMD document stage, however further changes to wording inserted to allow additional flexibility sought.	See (FC 10) in Addendum.
72.	DMD 41 - Advertisements DMD 41/03/001 03 - British Sign & Graphics Association	Object	Object to DMD 41 blanket ban on internally illuminated signs, box fascias or projecting signs in CAs. Unduly restrictive and contrary to the Control of Advertisements Regulations 2007 which requires all advertisements proposals to be considered on their individual merit. No justification provided for a blanket wide ban of all advertisements of certain types and/ or within a certain area.	As above. Text was amended via previous comments received at Draft document stage, however further changes have been made to the policy.	See (FC 10) in Addendum.

73.	DMD 43 - Tall buildings DMD 43/09/003 09 – English Heritage	N/S	Still consider policy could be improved further. This could be achieved by spatially translating the criteria of inappropriate, sensitive and appropriate onto a map of the Borough.	As previously considered during the draft Regulation 18 consultation with English Heritage, Enfield Council does not consider it possible to spatially map all of the criteria within the policy and therefore composite maps would not provide the precision that a criterion based policy allows.	No change.
74.	DMD 43 - Tall buildings DMD 43/33/011 33 – Broomfield Home Owners and Residents Association (BHORA)	N/S	The word “appropriate” is unclear. The criteria need to be defined. Tall buildings should not just be erected anywhere with little consideration being given to the surrounding area. Taking the North Circular Area Action Plan as an example the introduction of blocks of flats (Sites 1, 6, 11, 14, 15 and those at New Southgate) will transform a settled suburban area, yet little consideration has been given to this.	The terminology is taken from the CABE/English Heritage publication “Guidance on Tall buildings”. The criteria cannot all be strictly spatially defined as the spatial extent of the criteria will change depending on site-specific characteristics such as topography, existing built development and vegetation. Part 3 explicitly states that “The actual suitability of a proposal will always depend on the context of the site and details of the proposed building.” The policy therefore requires consideration of the surrounding area in all	No change.

				<p>circumstances. Part 2c also emphasises the importance of the surrounding area.</p> <p>The policy is supported by the London Plan, the Commission for Architecture and the Built Environment (CABE)/English Heritage publication: Guidance on Tall Buildings (2007) and local evidence contained in the Council's report on the location of tall buildings and important local views (2013).</p>	
75.	<p>DMD 44 - Preserving and Enhancing Heritage Assets</p> <p>DMD 44/09/004</p> <p>09 – English Heritage (EH)</p>		<p>Concerned with the insertion of the word 'normally' in Part 1 of DMD 44 as it introduces ambiguity in the intention and application of the policy. In addition there are no details to explain in which circumstances when a proposal that does fail to conserve or enhance a heritage asset's significance would be considered acceptable.</p> <p>Advise that, under Part 2 of the policy, development affecting heritage assets or their settings should:</p>	<p>Part 1 of has been amended to delete the word "normally"</p> <p>Changes to Part 2 of DMD 44 accepted.</p>	See (FC 11) in Addendum.

			<p>“conserve them in a manner appropriate to their significance”, and not necessarily ‘complement’.</p> <p>The current wording in Part 2 of the policy is insufficient in managing inappropriate developments that could cause harm to the significance of heritage assets, including their settings.</p>		
Chapter 7 Transport and Parking					
76.	<p>Chapter 7 – Transport and Parking</p> <p>Chapter 7/28/002</p> <p>28 – CgMs on behalf of Ikea Properties investment Ltd.</p>	Unsound	<p>Transport policies and in particular parking standards outlined seek to reflect London Plan standards. There needs to be sufficient flexibility when applying policies to enable operators with specific requirements and need to be considered on individual merit.</p>	<p>The policies and application of parking standards are in compliance with Enfield’s Core Strategy and the London Plan. The application of parking standards uses the word “appropriate” when having regards to London Plan standards in under Part 1 (Car Parking) of DMD 45 to provide such flexibility. Furthermore criterion 1e - reinforces the need for operational requirements to be met.</p>	No change.
77.	DMD 45 - Parking Standards	N/S	<p>Policy wording sets a tone which could encourage car parking provision within</p>	<p>Accept suggested changes to Part 1</p>	<p>See (FC 12) in Addendum.</p>

	<p>and Layout</p> <p>DMD 45/16/002</p> <p>16 – GLA</p>	<p>all development proposals regardless of their location, nature and scale. This is not consistent with the overall emphasis of London Plan Policy 6.13.DMD 45 should be reworded to read:</p> <p>Part 1</p> <p><u>“Car parking proposals will only be considered against the standards set out in the London Plan and:”</u></p> <p>Part 4 – Limited Parking or Car Free Housing Development:</p> <p>“Residential developments providing parking below London Plan Standards will only be considered if the site”</p> <p>TfL considers that this should be reworded to encourage rather than discourage low car parking provision.</p> <p>Partt 5 – Car Clubs:</p> <p>TfL still considers that Car Clubs should be encouraged for all development proposals not only those where lower parking provision is proposed.</p>	<p>of DMD 45.</p> <p>Changes made to Part 2 to include additional text on charging provision.</p> <p>Minor amendments made to Part 4 of DMD 45.</p> <p>Part 5 has been amended to be more encouraging,</p>	
--	--	--	--	--

			<p>Part 2 – Cycle and Powered Two Wheelers Parking:</p> <p>TfL wish to see direct reference made to the need for active and passive provision for electric vehicle charging points to be made within development proposals.</p>		
78.	<p>DMD 45 – Parking Standards and Layout</p> <p>DMD 45/22/002</p> <p>22 – Network Rail</p>	N/S	<p>Where there are existing structures surrounded by limited amenity space, such as railway arches, it will not always be possible to provide provisions for disabled parking as part of the redevelopment of a site in accordance with Policy DMD 45. Recommend that an additional section is added to Part 4 of Policy DMD 45 which states that if the Public Transport Accessibility Level (PTAL) of a site is at Level 4 or above and disabled access is available at the nearest train station, car free schemes will be permitted for these types of development.</p>	<p>The additional flexibility within the Policy is not accepted and is contrary to London Plan and Core Policy.</p>	No change.
79.	<p>DMD 45 - Parking Standards and Layout</p> <p>DMD 45/30/017</p>	N/S	<p>Part 4 - Limited Parking or Car Free Housing development, should be amended as follows:</p> <p>Residential developments providing</p>	<p>Substituting the words “be considered” with “be approved” is not considered appropriate as other local plan policies will need to</p>	No change.

	30 – Graham Fisher on behalf of A C Nicholas		parking below London Plan Standards will only be considered <u>normally be approved</u> if the site....	be considered before an application is “approved”. Inserting the word “normally” adds no further clarity to the Policy.	
80.	DMD 45 - Parking Standards and Layout DMD 45/33/12 33 – Broomfield Home Owners and Residents Association (BHORA)	N/S	There is no justification for allowing development below London Plan standards. Taking the NCAAP as an example the parking provision is very likely to cause an increase in on-street parking nearby.	London Plan parking standards are set as maximum standards. The Mayor of London has recognised the need for flexibility in applying the adopted London Plan Standards and this flexibility is reflected in the DMD policy.	No change.
81.	DMD 47 - New Roads, Access & Servicing DMD 47/33/13 33 – Broomfield Home Owners and Residents Association (BHORA)	N/S	Risk assessments should be done for safety where vehicles enter or leave the site, and for the safety of pedestrians and children within the site.	Noted. Focused changes are proposed by the Council under FC 18.	See (FC 18) in Addendum.
82.	DMD 48 - Transport Assessments DMD 48/33/14 33 – Broomfield Home Owners and Residents	N/S	It is not clear what these assessments will contain, this should be explained. BHORA expect them to include risk assessments.	Reference is provided within the supporting text to more detailed best practice guidance (footnotes 7-9). A brief description is also provided within the glossary. Focused changes 20 and 21 have	See (FC 20 and 21) in Addendum.

	Association (BHORA)			been put forward.	
83.	DMD 49 and DMD 50 Sustainable Design and Construction Statements; and Environmental Assessment Methods DMD 49&50/09/005 09 – English Heritage (EH)	N/S	Note that the Council seeks not to make any changes to the policy or supporting text in response to a previous representation. However, still suggest that these policies could benefit from some form of cross referencing In the absence of any reference to heritage matters in the supporting text. Suggest that DMD 49 and 50 should also be read in conjunction with Policy CS31 - Built and landscape heritage.	Additional cross referencing has been inserted.	See (FC 23) in Addendum .
84.	DMD 49 - Sustainable Design and Construction Statements DMD 49/30/018 30 – Graham Fisher on behalf of A C Nicholas	N/S	The reference to ‘all development’ is unduly onerous. The requirement should differentiate between householder, minor and major development.	The requirements of DMD 49 are set out in Appendix 3 and this states within the first sentence that the scale and scope of such statements will be determined on a site by site basis.	No change.
85.	DMD 49 - Sustainable Design and Construction Statements DMD 49/ 32/06	Unsound	A further reference to viability is required in the second paragraph of the policy. Without this reference, consider the policy to be unsound, as it would not be positively prepared or consistent with	Agree further clarification to paragraph 2: “All development will be required to include measures capable of mitigating and adapting to climate	See (FC 25) in Addendum .

	32 - LaSalle Investment Management on behalf of Stonehill Business Park		national policy. The NPPF requires plans to ensure the viability and deliverability of schemes, something which this policy does not achieve.	change to meet future needs <u>having regard to feasibility and economic viability</u>	
Chapter 8 Tackling Climate Change.					
86.	DMD 50 – Environmental Assessment Methods DMD 50/31/012 31- Planning Potential on behalf of Fairview New Homes.	Soundness	Delete requirement to “exceed” Code 4. Any requirement for the target from 2011 to 2015 to simply exceed Code Level 4 would, in essence, require applicants to demonstrate Code Level 5. While the inclusion of the words <u>“seek to”</u> is welcomed, suggest reference to the target to <u>“exceed”</u> be deleted.	The requirement for development <u>“to seek to exceed Code level 4”</u> is intentionally worded to encourage where feasible going beyond Code Level 4 and should be read within the context of additional text added to take account of issues of technical feasibility and economic viability.	No change.
87.	Paragraph 8.1.5 Para 8.1.5/ 31/ 013 31- Planning Potential on behalf of Fairview New		Point 2 of paragraph 8.1.5 states that “A post construction assessment, conducted by an accredited Assessor and supported by relevant BRE accreditation certificate, shall be submitted following the practical completion of the development and prior to the first occupation, unless otherwise agreed by the Local Planning Authority.” This point is not compatible for larger developments coming forward. Support	Flexibility to negotiate the submission of a post construction assessment with the LPA is given within the same sentence.	No change.

			<p>the flexibility provided by stating “<i>unless otherwise agreed by the Local Planning Authority</i>”. However while Fairview Homes agree with the wording of the paragraph that states: “<i>following practical completion of the development</i>” as this implies certification can be provided on completion of the development. Fairview Homes do not concur with the following section of the paragraph that states: “and prior to first occupation” as this dictates that that nothing can be occupied until it has a certificate.</p>		
88.	<p>DMD 51 - Energy Efficiency Standards</p> <p>DMD 51/ 30/ 019</p> <p>30 – Graham Fisher on behalf of A C Nicholas</p>	N/S	<p>The reference to ‘all development’ is unduly onerous. The requirement should differentiate between householder, minor and major development.</p>	<p>As set out in the Council’s response to Rep No 84 the requirements for all development to submit Energy Statements is in accordance with Local and National policy and standards. This is to be submitted as part of a developer’s obligation to submit a Sustainable Design and Construction Statement, the detailed requirements of which are set out in Appendix 3. Appropriate flexibility is given to determining the</p>	No change.

				level of detail required.	
89.	DMD 54 - Allowable Solutions DMD 54/20/007 20 – Planning Potential on behalf of Scottish Widows	Unsound	DMD 54 is in direct conflict with the Government’s current consultation on allowable solutions. Policy may require amendment to reflect outcome of the Government’s consultation.	DMD 54 is not in direct conflict as the consultation relates to the 2016 change to zero carbon and this has yet to be decided. The preferred option so is a market led allowable solutions mechanism although the potential of Local Authorities to act as a provider of allowable solutions has not necessarily be discounted. The range of options available could have a number of impacts although the thrust of the policy would still broadly comply. An amendment at this stage would be premature.	No change.
90.	DMD 54 - Allowable Solutions DMD 54/ 31/14 31- Planning Potential on behalf of Fairview New Homes	Comment	DMD 54 needs to be considered in the context of the Government’s current consultation on Allowable Solutions. It may therefore require amendment to reflect the outcome of the Government guidance and avoid any conflict with national policy.	An amendment to DMD 54 at this stage would be premature. See LBE response to Rep no 89 above.	No change.
91.	DMD 55 - Use of roof space / vertical surfaces.	Unsound	The policy requirements for new / major development will, in some instances (for	The Policy clearly states that this is <u>“subject to technical and economic</u>	No change.

	DMD 55/20/008 20 – Planning Potential on behalf of Scottish Widows		example B8 premises), result in buildings unsuited to their intended purposes. Green roofs add additional weight and would be contrary to the minimal internal structure required to maximise racking space. Warehouse spaces are typically unheated spaces and the best opportunity to reduce energy consumption is through the use of roof lights, a green roof requirement would prevent the use of cost-effective roof lights. The policy introduces additional maintenance.	<u>feasibility and other relevant planning considerations”</u> .	
92.	DMD 55 - Use of Roofs Pace / Vertical Surfaces DMD 55/26/001 26 – Environment Agency (EA)	Support	Strongly support the inclusion of this policy to increase the use of green roofs and walls in Enfield.	Noted.	No change.
93.	DMD 56 - Heating and Cooling. DMD 56/11/001 11 - Thames Water (TW)		Insert new text in Policy DMD 56 to include a caveat that the policy’s requirements are: <u>“subject to technical, operational and financial feasibility and other planning considerations”</u> .	Consider for consistency with DMD 55 adding <u>“subject to technical, operational and financial feasibility and other planning considerations”</u>	See (FC 24) in Addendum .

94.	DMD 57 – Responsible sourcing of materials DMD 57/11/002 11 – Thames Water (TW)	Unsound	Insert new text in Policy DMD 57 to include a caveat that the policy’s requirements are: <u>“subject to technical, operational and financial feasibility and other planning considerations”.</u>	As rep no 93: Consider for consistency with DMD 55 adding <u>“subject to technical, operational and financial feasibility and other planning considerations”</u>	See (FC 25) in Addendum.
95.	DMD 58 – Water efficiency DMD 58/11/003 11 – Thames Water (TW)	Unsound	The DMD policy as worded fails to adequately provide the policies that were foreshadowed in the Core Strategy, and are required to implement the NPPF and London Plan Policy 5.14. As drafted, the DPD fails to provide explicit policy support for the provision of necessary new water and wastewater infrastructure – infrastructure that is critical to protect the environment of the borough and to meet its growth aspirations. As a result, the DMD is not effective, nor consistent with national policy. Paragraph 7.22 in the supporting text to Core Strategy Policy 21 states that “The Development Management DPD will contain policies that have regard to the	Requested changes 2 and 3 have been accepted and focused changes are proposed. However the remaining changes sought are not considered appropriate DMD planning policy requirements and go beyond the statutory planning function of the local authority in assessing individual planning applications.	See (FC 26 and 27) in Addendum.

		<p>impact of development proposals on water demand and existing capacity”.</p> <p>Requested change 1:</p> <p>The following wording should be added to Policy DMD 58 after ‘Greywater Collection’ (new text underlined):</p> <p><u>“Water and Wastewater Infrastructure”</u></p> <p><u>All new development proposals will be required to demonstrate that there is sufficient water and wastewater infrastructure capacity both on and off site to serve the development or that any necessary upgrades will be delivered ahead of the occupation of development.</u></p> <p><u>In accordance with Core Policy 46, when there is a capacity problem and improvements in off-site infrastructure are not programmed, developers will be required to make financial and in kind contributions towards infrastructure and community facilities.</u></p> <p><u>The Council will work with water supply and wastewater companies and support</u></p>		
--	--	--	--	--

		<p><u>new water supply and wastewater infrastructure improvements necessary to meet existing and future demand. Planning permission will be granted where such proposals are consistent with, or do not materially conflict with, other development plan policies.”</u></p> <p>Requested change 2:</p> <p>Add reference to Core Strategy Policy 46 to the last sentence in DMD 58.</p> <p>Requested change 3:</p> <p>The first sentence of DMD 58 should be amended to include the following caveat (new text underlined):</p> <p><u>“...all new development will be required to maximise its water efficiency subject to technical, operational and financial feasibility and other planning considerations”.</u></p> <p>Requested change 4:</p> <p>Include new supporting text to support Policy DMD 58, to be placed under</p>		
--	--	---	--	--

			<p>paragraph 8.4.4 (new text underlined)</p> <p><u>“The Council will also seek to ensure that there is adequate water and foul drainage capacity to serve all new developments to avoid any adverse amenity impact. The developer will be required to demonstrate that there is adequate infrastructure both on and off the site to serve the development and that it would not lead to problems for existing users or future occupiers.</u></p> <p><u>In some circumstances a water supply and / or drainage strategy will need to be produced by the developer in liaison with Thames Water to ensure the appropriate upgrades are in place ahead of occupation of the development.</u></p> <p><u>Where there is a capacity problem or potential adverse amenity impact on future occupiers, and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund in full the appropriate improvements which must be completed prior to occupation of the</u></p>		
--	--	--	---	--	--

			<p><u>development.'</u></p> <p><u>A major upgrade is being planned for the Deephams Sewage Works during the plan period, to meet new environmental standards and to accommodate growth within the catchment. The principal of the upgrade is supported as being necessary to deliver infrastructure to meet existing and future wastewater demands."</u></p>		
96.	<p>DMD 58 - Water Efficiency</p> <p>DMD 58/26/ 002</p> <p>26 – Environment Agency (EA)</p>	Support	<p>Strongly support the inclusion of this policy, and are pleased that the Council has included positive targets for water efficiency.</p>	Noted.	No change.
97.	<p>DMD 59 - Avoiding and Reducing Flood Risk</p> <p>DMD 56/11/003</p> <p>11 – Thames Water (TW)</p>	Unsound	<p>Whilst Thames Water supports the changes made in the Submission Draft DPD (as compared to the earlier draft), it is considered that the policy wording still does not go far enough to provide explicit policy guidance on the potential for sewer flooding.</p> <p>Without the inclusion of such wording it is considered that the DMD is unsound as it is not effective – as there is insufficient</p>	<p>The current wording is considered sufficient to cover the requirements of development. In particular the final sentence emphasises that all sources of flood risk will be considered.</p>	No change.

			policy security to ensure that new development will not lead to sewer flooding, or that the issue will expressly be considered through application for planning permission.		
98.	DMD 59 - Avoiding and reducing Flood Risk DMD 59/26/003 26 – Environment Agency (EA)	Comment	<p>Believe that the wrong DMD policy number has been quoted at the end of section 1 a) of the policy. This should reference DMD 60, not DMD 62.</p> <p>The EA suggest removing “in consultation with the Environment Agency” from the final paragraph, as in the near future Enfield Council will be taking over responsibility for reviewing SuDS, in the role as SuDS Approval Body. Therefore the Environment Agency will no longer be consulted. This does not alter our current role to review surface water drainage for all sites over one hectare in size.</p> <p>The EA suggest amending the end of the last paragraph to read <u>“... or result in, unacceptable levels of flood risk on site or increase the level of flood risk to third parties.”</u></p>	Amend DMD 59 to correct cross-referencing and revise the final paragraph.	See (FC 28) in Addendum.

99.	DMD 60 - Assessing Flood Risk DMD 60/11/004 11 – Thames Water (TW)		The policy text for DMD 60 under section 2 ‘Additional requirements for non-fluvial flooding’ should be amended to add a new bullet ‘b.’ as follows: <u>“b. Development proposals will need to demonstrate through a drainage strategy, that down stream flooding of the sewer or combined sewer network will not occur as a result of the development or if flooding will occur as a result of the development, appropriate mitigation will be proposed to address the flooding.”</u>	The current wording is considered sufficient to cover the requirements of development.	No change.
100.	DMD 60 - Assessing Food Risk DMD 60/26/ 004 26 – Environment Agency (EA)	Support	Strongly support this policy; particularly part f) which states the criteria that should be met to pass the Exception Test.	Noted.	No change.
101.	Paragraph 8.5.7 Para. 8.5.7/26/005 26 – Environment Agency (EA)	Comment	There is a typo in the second line that has changed the meaning of the sentence. In part of the sentence: “...unless there is a clear justification or an alternative...” – the word “or” should be replaced with	Typographical correction agreed.	Minor change required.

			“for”.		
102.	DMD 61 – Managing Surface Water DMD 61/11/005 11 – Thames Water	Support	Support Policy.	Noted.	No change.
103.	DMD 61 - Managing Surface Water. DMD 61/26/006 26 – Environment Agency (EA)	Comment	The EA are unclear why Part 2 a) of the Policy identifies the 1 in 1 year event. If the 1 in 100 year event is being achieved, then the 1 in 1 year event will be fine. You may wish the 1 in 30 year event to be demonstrated (in addition to the 1 in 100) as this is often required for drainage systems to be adopted. Suggest you alter the wording to: “All major developments must achieve greenfield run off rates (demonstrated for the 1 in 30 and 1 in 100 chance in any year including an allowance for climate change storm events).”	The DMD has applied the 1 in 1 year event to major developments as the majority will be on brownfield sites and these will have the greatest impact on flood risk in Enfield. Therefore it is considered reasonable to apply higher standards. A focused change to reference the need for a Drainage Strategy has been included within the policy.	See (FC 30) in Addendum.
104.	DMD 62 - Flood Control and Mitigation Measures	Comment	This policy covers all forms of flooding and is a last resort - as identified in paragraph 8.5.16. Paragraph 8.5.17	The change in wording is largely accepted.	See (FC 31) in Addendum.

	DMD 62/26/007 26 – Environment Agency (EA)		<p>identifies criteria that development must meet to be classed as safe. With this in mind, the EA suggest amending the first paragraph to:</p> <p><u>“Development that increases flood risk to third parties or is not defined as safe in line with Enfield’s Strategic Flood Risk Assessment (SFRA) will not be acceptable. All new developments at risk of flooding should be accompanied by appropriate flood mitigation measures. These should include:”</u></p>		
105.	DMD 63 - Protection and improvement of watercourses and Flood Defences DMD 63/26/008 26 – Environment Agency (EA)	Comment	<p>In part 1 a) of the policy, the EA request that the wording is altered slightly as set out:</p> <p><u>“Be set back from main rivers and ordinary watercourses, in the case of the former, maintain a minimum 8m buffer strip, which should be free of development and naturalised where feasible”</u></p> <p>Part 3 a) of the policy should be altered. There should be no deterioration of a watercourse, and if a development was shown to be detrimental to a</p>	Agree to the proposed rewording of DMD 63.	See (FC 31) in Addendum.

			<p>watercourse, it would be unlikely to be acceptable, and would not pass a Water Framework Directive (WFD) assessment. We recommend that this sentence is re-written to: <u>“Result in the deterioration of a watercourse; or”</u></p> <p>Part 3 b) of the policy could reference the Thames River Basin Management Plan (RBMP) directly, as this is the only RBMP associated with Enfield.</p> <p>In the final paragraph of the policy, or in the accompanying text to the policy, the EA strongly recommend that the Council advise applicants to contact the EA if their proposals are likely to require a WFD Assessment. This is because there will be specific actions that they need to undertake with their assessment depending on the waterbody that will be affected.</p>		
106.	<p>Paragraph 8.5.22</p> <p>Para 8.5.22/26/009</p> <p>26 – Environment Agency (EA)</p>		<p>The EA should only be consulted on applications within 8 metres of a main river, and not within 20m as identified in the DMPO. This paragraph should be updated to reflect this.</p>	Text Updated	See (FC 33) in Addendum.

107.	DMD 64 – Pollution control and assessment DMD 64/11/006 11 – Thames Water (TW)		As currently drafted DMD 64 is not sufficiently clear to enable it to be satisfactorily implemented through the development management process It is proposed that word “ minimised ” is replaced with “ reduced ”.	Accepted.	See (FC 34) in Addendum.
108.	DMD 65 – Air Quality DMD 65/11/007 11 – Thames Water (TW)	N/S	Amend Policy DMD 65 part 3 to require a technical assessment that should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned to ensure that any potential for adverse amenity impact can be avoided/mitigated.	Air quality assessments are required as either standalone documents or as part of an Environmental Assessment as stated in supporting text in paragraph 91.4 therefore the additional wording put forward is not considered necessary.	No change.
109.	Paragraph 9.2.3 Para 9.2.3/31/013 31- Planning Potential on behalf of Fairview New Homes	Support	The paragraph states “ <i>the remediation strategy should consider waste management implications when deciding the best approach to remediation and the handling and treatment of contaminated soils including treatment in-situ and ex-situ</i> ”. The flexibility in the approach the Council	Noted.	No Change.

			is taking in relation to Land Contamination is welcomed.		
Chapter 9 Environmental Protection					
110.	DMD 66 - Land Contamination and Instability DMD 66/26/010 26 – Environment Agency (EA)	Support	Strongly support this policy.	Noted	No Change.
111.	Paragraph 9.2.4 Para 9.2.4/26/011 26 – Environment Agency (EA)	Comment	In the second line, examples are given of sensitive receptors, but controlled waters (surface and groundwater) are not mentioned. Request that both surface waters and groundwater are added to this list for clarity.	Text amended to insert additional example. Paragraph 9.2.4 “The standard of remediation should ensure that the site is suitable for its proposed use, and that all unacceptable risks (to receptors such as living organisms, ecological systems – fauna/flora, property, landscape, amenity, <u>controlled surface water and groundwater</u>) have been addressed.....	See (FC 35) in Addendum.

112.	<p>Section 9.3 Hazardous Substances</p> <p>Section 9.3/26/012</p> <p>26 – Environment Agency (EA)</p>	Comment	<p>The EA recently re-published the Groundwater protection: Principles and practice (GP3) document in November 2012. This document outlines our position statements to a number of key activities for the protection of groundwater. In relation to this policy and text (“Hazardous Substances”), three of our position statements in GP3 (D1-D3 on pages 69-71) relate to hazardous substances and should be referenced in the accompanying text to policy DMD 67.</p> <p>Our GP3 guidance can be found here: https://brand.environmentagency.gov.uk/mb/rGL7f.</p>	Reference to GP3 guidance added to paragraph 9.3.3.	See (FC 36) in Addendum.
113.	<p>DMD 67 - Hazardous Installations</p> <p>DMD 67/16/003</p> <p>16 - GLA</p>		<p>Does not fully comply with the provision of London Plan Policy 5.22 Hazardous Substances and Installations, particularly with Clause Bb which states that “risks to people and the environment should be balanced with the benefits of development and that existing patterns of development should be taken account of.” It should also take into account the London Plan Revised Early Minor Alterations which states that “Boroughs</p>	The Council has reviewed the Policy and supporting text in light of comments and the publication of London Plan Revised Early Minor Alterations (REMA). Further PPMC are now proposes focused changes.	See (FC 37) in Addendum.

			should also periodically review consents granted under Planning (Hazardous Substances) Act 1990 to ensure they reflect current conditions and the physical capacity of the site.		
114.	DMD 68 – Noise DMD 68/11/008 11 – Thames Water (TW)		<p>Whilst the intentions of Part 4 of the policy to limit the impact of noise generating uses is supported, it is considered that the policy wording is too restrictive to be capable of being applied in a highly developed London Boroughs such as Enfield, where residential, leisure, industrial and other uses are frequently located adjacent to each other.</p> <p>Proposed amendment to Part 4 of the policy to read (change shown):</p> <p>“4. Development involving potential noise generating development will only be permitted in appropriate locations, where there is compatibility with existing uses and no adverse impact on amenity”</p> <p>Part 5 of DMD 68, requires where appropriate, an improvement of 10dB on background noise levels. However, the</p>	Focused changes made in response to representations.	See (FC 38) in Addendum.

			<p>wording of paragraph 9.4.3 of the supporting text includes clarification that where this is not possible the Council will consider what level of improvement could be achieved. The flexibility in the supporting text is welcomed, however it is considered that more flexible wording should be included in the policy wording itself, by reference to an agreed standard such as the WHO Guidelines on Community Noise, to provide certainty to applicants and consultees alike.</p> <p>Proposed amendment to Part 5 of the policy to read (revised wording shown):</p> <p>“Proposals for plant and machinery that result in significant harm to amenity will not be permitted. Developments must not contribute to cumulatively higher noise levels and, where practicable, must be designed to achieve no increase to background levels. Where this is not practicable developments should be designed to meet WHO Guidelines on Community Noise.”</p>		
--	--	--	--	--	--

115.	DMD 70 - Water Quality DMD 70/26/013 26 – Environment Agency (EA)	Support	The EA strongly support this policy.	Noted.	No change.
116.	Section 9.6 Section 9.6 /26/014 26 – Environment Agency (EA)		<p>The justification and guidance should include Water Framework Directive (WFD). Many of the actions in the WFD relate to water quality and this legislation is of key importance.</p> <p>This policy on waterways makes no reference to the ecological value/character of the waterways in Enfield. It focuses principally on access. A sentence could be added here to say that access is encouraged provided that there is no adverse ecological impact and the ability of the waterbody to meet its WFD targets is not inhibited - this will be established through WFD screening before work is approved.</p>	Agree that an additional sentence be added to Paragraph 9.6.1 to reference the Water framework Directive.	See (FC 39) in Addendum.

Chapter 10 Green Infrastructure					
117.	DMD 72 - Open Space Provision DMD 72/30/020 30 – Graham Fisher on behalf of A C Nicholas		<p>This should be amended as follows:</p> <p><u>‘Where appropriate,</u> All new major residential development should be accompanied by proposals to improve open space provision. The nature of such improvements should reflect any additional open space needs generated as a result of the proposed development.</p> <p>The final sentence (The applicant will be required to make a contribution towards the enhancement of open space or associated facilities) should be deleted as this will not always be necessary.</p>	The change is not accepted as it does not add any additional clarification to the policy approach.	No change.
118.	DMD 74: Playing Pitches. DMD 74/27/001 27 – Sport England		The use of the words ‘sports pitches’ rather than ‘playing field’ is unhelpful and unclear. A sports pitch comprises white markings to denote the areas of play of a particular sport. These pitch markings are subject to change on a regular basis. Therefore the term ‘sports pitch’ does not adequately define the site or area that the policy seeks to	<p>The suggested wording for Parts 1 and 2 of DMD 74 are accepted, however Part 4 should remain.</p> <p>‘Appropriate’ development is undefined within paragraph 89 NPPF and furthermore the NPPF is silent of Floodlighting. On this basis Part 4 is still compliant and provides clarity over what the Local</p>	See (FC 40) in Addendum.

		<p>protect. This policy is therefore unclear.</p> <p>The policy should be amended to read as follows;</p> <p>Part 1 of the policy should be amended to read:</p> <p>“... Development involving the loss of playing field land sports pitches will not be permitted...”</p> <p>Part 2 of the should also be amended to read:</p> <p>“...The preference for new playing field land sports pitches is natural grass pitches...”</p> <p>Part 4 should be omitted. The wording of the paragraph 89 of the NPPF replaces the term ‘essential facilities’ with ‘appropriate facilities’ for outdoor sport and outdoor recreation. Floodlighting should therefore not be considered as inappropriate development ‘as standard’.</p>	<p>Plan would consider inappropriate development - “by definition harmful to the Green Belt and should not be approved except in very special circumstances” paragraph 87 of NPPF.</p>	
--	--	---	--	--

119.	DMD 74 - Playing Pitches DMD 74/30/021 30 – Graham Fisher on behalf of A C Nicholas		This should be amended as follows: 1. Development involving the loss of sports pitches will not be permitted <u>unless special circumstances apply.</u>	The policy objective to protect Enfield’s sports pitches apply and therefore by adding the suggested flexibility to the wording of policy would be inappropriate. Applications that result in the loss of sport pitches would have to justify an exception to DMD 74 and Core Policy 34.	No change
120.	DMD 75 - Waterways DMD75/20/009 20 – Planning Potential on behalf of Scottish Widows	Soundness	A considerable amount of Enfield’s Strategic Industrial Location (SIL) is located next to the River Lee. In the case of Ponders End Industrial Estate it would not be possible to achieve a workable layout fronting the river without also introducing new roads and parking. It is difficult to understand how the detailed objectives of this policy can be fulfilled.	The overall objectives of DMD 75 would still apply notwithstanding any exceptional circumstances that maybe specific to individual sites.	No change.
121.	DMD 75 - Waterways DMD 75/04/001 04 – Individual	N/S	Majority of representation relates to Meridian Water Masterplan. General representation raises concerns that planning applications involving the waterfront need to have a relative proportion of affordable moorings and some form of amenity such as a waterside water tap made as a condition	Noted. DMD 75 includes consideration of moorings on the River Lee Navigation.	No change.

			of developing the area. The waterways which were made for freight have become both residential and leisure places can have new developments built alongside them which then exclude the boating community.		
122.	DMD 75 - Waterways DMD 75/21/001 21 - Canal and River Trust		Additional clarity sought. Policy should be amended to read: “ Permanently moored vessels <u>Permanent residential or commercial moorings</u> on the River Lee Navigation will be permitted provided...”	Agree to amended wording to provide additional clarity.	See (FC 41) in Addendum.
123.	DMD 75 – Waterways DMD 75/32/007 32 - LaSalle Investment Management on behalf of Stonehill Business Park	Unsound	Whilst the term “where possible” is included in the policy, further clarification of this point is required for the policy to be found sound. Currently, it is unclear what the words “where possible” refer to. In this state, the policy would not be consistent with national policy, as it would potentially create a barrier to the optimisation of the site and to other objectives within the Local Plan. References to site specific constraints and viability should be included at this point in the policy to	The overall objectives of the Policy would still apply notwithstanding any exceptional circumstances that maybe specific to individual sites.	No change.

			show that in some cases an active façade may not be possible, or appropriate depending on the use of the site. In locations such as Stonehill Business Park, where the site is covered by a Strategic Industrial Location designation, it is unlikely that an active frontage will be appropriate and therefore the policy should allow for flexibility to ensure regenerative efforts can be appropriately accommodated.		
124.	DMD 75 - Waterways DMD 75 /26/015 26 – Environment Agency (EA)	Comment	Under the “moorings” section, the EA request that an additional criterion is added to the list. This is to ensure that any new residential moorings do not put the occupants or others at increased flood risk, for example providing safe access and egress: “e. There is no increase in flood risk.”	Noted and agree proposed change.	See (FC 41) in Addendum.
125.	Paragraph 10.4.3. Waterways Para.10.4.3/06/001 06 - Commercial Boat Operators Association	Support	Support the use of the River Lea for freight. CBOA are in full agreement that water freight is a realistic and sustainable alternative to the movement of freight by road. Encouraging applicants to consider the	Noted.	No change.

	(CBOA).		River Lea for freight use as part of their Construction/Traffic Management Plan or Environmental Impact Assessment is also constructive, where proposed development is bordering the River Lea.		
126.	DMD 75 - Waterways DMD 75/23/002 23 - Lea Valley regional Park Authority (LVRPA)	Unsound	<p>Whilst this extra provision is supported, the Authority's original concern about the term 'permanently moored vessels' has not been resolved and as it stands would allow for residential moorings in the Park. An addition to the Glossary by the Council confirms that Permanent Moorings includes residential moorings. The Authority notes the redrafting of policy which addresses transportation of freight. This now offers support for development which maximises transportation of freight by water. This redrafting does not however address the Authority's concern about the need to take account of existing and future leisure use of the waterways.</p> <p>Policy reworded as follows:</p> <p>Development which maximises transportation of freight by water will be <u>supported provided due consideration is</u></p>	Additional clarity added to criteria c. to reflect concerns over any adverse impact on the leisure uses of waterways.	See (FC 41) in Addendum.

			<u>given to the leisure use of the waterways.</u>		
127.	DMD 79 - Ecological Enhancements DMD 79/32/008 32 - LaSalle Investment Management on behalf of Stonehill Business Park	Unsound	This policy requires development of a certain size to provide on-site ecological enhancements. Paragraph 173 of the NPPF places emphasis on viability and deliverability of schemes, and there is no reference to this within the policy. In order for the policy to be found sound, suggest that references to viability and the site specific circumstances are included at this point.	Agree to additional flexibility for consistency.	See (FC 42) in Addendum.
Chapter 11 Green Belt					
128.	Chapter 11 – Green Belt Chp.11/05/001 05 – Real Securities Ltd.(RS)	Support	RS Ltd own the land at Beech Hill and agree with removal of land from Green Belt – fully support the DMD.	Noted.	No change.
129.	Chapter 11 – Green Belt Chp.11/07/001 07 - Nathaniel Lichfield & Partners.	Support	Support Royal Chase being removed from Green Belt.	Noted.	No change.

130.	DMD 77 - Green Chains DMD 77/30/022 30 – Graham Fisher on behalf of A C Nicholas		This should be amended as follows: “ Major development within a 5 minute walk or 400 metre radius from a Green Chain must integrate with the network and development will only be permitted if....”	The intention of the policy is for all development to contribute as appropriate in facilitating access to open space and nature as set out on paragraph 10.5.2. Therefore the suggested amended for this to apply to “major” development only is not appropriate.	No change.
131.	DMD 82 – Protecting the Green Belt DMD 82/11/009 11 – Thames Water (TW)	N/S	Criterion (d) - The policy wording should be amended to include flexibility for circumstances where some features are removed, but their removal is mitigated. It is proposed that bullet ‘d’ of this policy is amended to read as follows: “d. Where possible, existing trees, hedges, bushes and other natural features are retained and integrated with the scheme to ensure adequate screening. <u>Where this is not possible, planning permission will only be granted if adequate mitigation measures are secured.</u> ”	Agree to wording.	See (FC 43) in Addendum.
132.	DMD 82 – Protecting the Green Belt	Unsound	Question the Council’s methodology and specifically object to inclusion of land at Enfield Road and Green Belt Review	Justification for inclusion of sites in designated areas referred to is provided in the evidence base	No change.

	DMD 82/31/014 31 – Planning Potential on behalf of Fairview Homes		Methodology.	which supports the DMD. This representation relates to the release of the large expanse of open green belt area south of Enfield Road. The current green belt boundary in this location is well defined. The site is a large open field that upholds the aims of the Green Belt policy.	
133.	DMD 83 - Development Adjacent Green Belt DMD 83/30/023 30 – Graham Fisher on behalf of A C Nicholas		This should be amended as follows: a. There is no <u>harm to the green belt by reason of any</u> increase in the visual dominance and intrusiveness of the built form by way of height, scale and massing.	Additional wording is not considered necessary.	No change.
134.	DMD 83 - Development Adjacent Green Belt DMD 83/32/009 32 - LaSalle Investment Management on behalf of Stonehill Business Park	Unsound	This policy places a number of restrictions on development located next to or near to the Green Belt. Whilst we understand the need to protect the visual appearance of the Green Belt, DMD 83 its current form is too restrictive and does not give consideration to site specific circumstances. Stonehill Business Park is covered by a Strategic Industrial Location (SIL) designation and therefore	DMD 83 is not considered inflexible. The objectives to protect land adjacent to the Green Belt, regardless of existing land use designations are still applicable and would not restrict development or optimising the use of land any more than any other site specific circumstances.	No change.

			<p>uses should be appropriate for this, primarily in order to support jobs and growth in the Borough.</p> <p>The policy is inflexible and not sound as it restricts development from optimising the site, as required by the NPPF. Reference to site specific circumstances should be inserted into the first paragraph of the policy.</p>		
135.	<p>DMD 84 - Areas of Special Character</p> <p>DMD 84/31/015</p> <p>31 – Planning Potential on behalf of Fairview New Homes</p>	Unsound	<p>Do not support the Council’s evidence base which identifies the land at Enfield Road as being part of the Merryhills Brook Special Area. Given its relationship with the current urban form and the benefits associated with its development in terms of meeting housing targets and delivering housing growth and other land use objectives (mix of uses), as well as lack of constraints and overall deliverability, we consider the release of this land is appropriate and in line with NPPF criteria. The land should be excluded from the Green Belt and the Area of Special Character.</p>	<p>Justification for inclusion of sites in designated areas referred to is provided in the evidence base which supports the DMD.</p>	No change.

<p>136.</p>	<p>DMD 89 - Developed Sites in the Green Belt.</p> <p>DMD 89/08/001</p> <p>08- Garden Centre Group, owners of Enfield Garden Centre, Cattlegate Road, Crews Hill.</p>	<p>Unsound</p>	<p>Para. 11.5.1, which provides the justification for the policy, indicates that Policy DMD 89 sets out a ‘two tier approach’ to protecting the Green Belt and delivering sustainable development. It allows for limited infilling on previously developed sites (subject to specific criteria) but indicates that the complete or partial redevelopment of previously developed sites will only be considered to be ‘appropriate’ in the case of 2 Major Developed Sites (Trent Park University Campus and Picketts Lock) identified within the policy and on the Policies Map.</p> <p>There is no national policy to support for the use of such a two tier approach set out in the National Planning Policy Framework (NPPF).</p> <p>Para 89 of the NPPF identifies six specific exceptions, the final one of which is “limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which</p>	<p>The Policy is still considered NPPF compliant, however the Council has responded via focused changes proposed within both policy and supporting text</p> <p>The Council has responded via focused changes proposed within both policy and supporting text.</p> <p>The Policy should also be read alongside other policies in the Chapter including DMD 89.</p>	<p>See (FC 44) in Addendum.</p>
-------------	---	----------------	--	---	---------------------------------

			<p>would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than existing development”.</p> <p>There is nothing contained within the Framework that suggests that a Council can elect to consider the complete or partial redevelopment of certain sites as ‘appropriate’ in Green Belt terms, whilst the redevelopment of other similar but unidentified sites would remain ‘inappropriate’.</p>		
137.	<p>DMD 89 – Previously Developed Sites in the Green Belt.</p> <p>DMD 89/17/003</p> <p>17 - Wildstone Planning On behalf of Trent Park Golf Club.</p>	Unsound	<p>The criteria based Policy in its current form is inconsistent with National Policy. The NPPF simply requires that extensions or alterations are not disproportionate to the size of the original building. The reference in criteria 2a is far too prescriptive, a more balanced judgement is needed to determine whether a design is acceptable in aesthetic terms in the Green Belt (i.e. additional height may be needed to improve the appearance of the building). The policy is unsound and needs to be reworded to reflect the guidance in the NPPF.</p>	<p>The Policy is still considered NPPF compliant, however the Council has responded via focused changes proposed within both policy and supporting text.</p>	<p>See (FC 44) in Addendum.</p>

138.	<p>DMD 89 - Previously Developed Sites in the Green Belt</p> <p>DMD 89/30/024</p> <p>30 – Graham Fisher on behalf of A C Nicholas</p>		<p>This should be amended as follows:</p> <p>1. Complete or partial redevelopment of sites will only be permitted on Major Developed Sites (Trent Park University Campus and Picketts Lock) previously developed land and where the proposal improves the character and appearance of the site and appearance from the surrounding Green Belt. New development must not have a greater impact on the openness of the Green Belt than the existing development.</p> <p>Criterion 2 should be deleted in its entirety. It is too prescriptive and partially covered by criterion 1 and other policies.</p>	<p>The Council has responded via focused changes proposed within both policy and supporting text.</p>	<p>See (FC 44) in Addendum.</p>
139.	<p>Appendix 4</p> <p>App 4/30/025</p> <p>30 – Graham Fisher on behalf of A C Nicholas</p>	N/S	<p>This should be amended as follows:</p> <p>The following minimum space standards will normally be applied in line with the London Plan and/or the London Housing Design Guide (Interim Edition):</p>	<p>The suggested change is not considered necessary.</p>	<p>No change.</p>
140.	<p>Appendix 7</p> <p>App 7/30/026</p>	N/S	<p>It should be made clear that the London Plan parking standards will be applied flexibly having regard to the location of</p>	<p>The suggested change is not considered necessary both DMD 45 and its supporting text provides</p>	<p>No change.</p>

	30 – Graham Fisher on behalf of A C Nicholas		the site and the nature of the proposed development.	sufficient guidance.	
Policies Map					
141.	<p>Policies Map</p> <p>PM/20/010</p> <p>20 – Planning Potential on behalf of Scottish Widows</p>	N/S	<p>Representation relates specifically to the designated Strategic Industrial Land allocation of Ponders End Industrial Estate. Scottish Widows Investment Partnership (SWIP) – owners of Ponders End Industrial Estate and Graftongate – development Partner only recently become involved in this site.</p> <p>Whilst recognising amendments to the Proposals Map were endorsed through the Core Strategy, it is understood the Council is currently accepting representations on the draft DMD policies Map. As new owners SWIP and Graftongate are seeking to regenerate the whole of Ponders End Industrial Estate and would encourage Enfield Council to return the southern section of Estate back to its former industrial allocation.</p>	<p>SIL de-designation was accepted as part of the Core Strategy adoption.</p> <p>Strategic land designations have been established by the Core Strategy. The DMD does not provide any further evidence to justify returning the southern part of the estate back to SIL.</p>	No change.

Glossary					
142.	<p>Glossary - DMD 39 – The design of business premises</p> <p>Glossary/11/010</p> <p>11 – Thames Water (TW)</p>		<p>Thames Water made representations against the Draft Policy as no definition of the term “business premises” was included in the Draft DMD.</p> <p>LB Enfield has now included a definition of the term in the glossary, however Thames Water now objects to the wording as it explicitly includes “utility company premises” within the definition of business premises to which the provisions of Policy DMD 39 would apply.</p> <p>The approach taken to the definition of business premises is different from that taken to the definition under the CIL Regulations, where there is an explicit recognition that there are some buildings that people do not work within or enter on a regular basis, other than for operation maintenance and emergencies. Many of Thames Water’s own premises fall into this category and it is considered that the Policy wording or glossary needs to be amended to explicitly exclude utility buildings and</p>	<p>PPMC Appendix 14</p> <p>“Building Premises: All buildings and land used for the carrying out of commercial, industrial or other non-residential operations, but excluding public buildings, and institutions <u>and utility premises which people do not regularly enter</u>. Examples include shops, factories, warehouses, utility company premises and depots.</p>	<p>See (FC 47) in Addendum.</p>

			buildings into which people do not normally enter on a regular basis from the definition of "business premises".		
--	--	--	--	--	--