

North Circular Area Action Plan

Schedule of Representations and Enfield Council's Response

August 2013



Rep No	Section or Policy / Representation no Representor No. and Name	Leg Compliant N/S = Not Stated	Is the DPD Sound? N/S = Not Stated	Comments on the Proposed Submission NCAAP	LBE Response	LBE Proposed NCAAP Change
Whole Plan						
1	Whole Plan /01/001 01 – English Heritage	N/S	N/S	Heritage Assets should be given greater attention in the NCAAP by identifying heritage assets within the area on a plan and area-based diagrams. Reference should also be made to English Heritage’s Guidance on the Setting of Heritage Assets (2011) to be used as a methodology for identifying site design parameters which respect and enhance the setting of heritage assets.	No archaeological priority areas exist within the North Circular Area Action Plan (NCAAP) area. Where assets of heritage value may be directly or indirectly impacted by proposals within the Plan, the document provides guidance, as appropriate within the relevant policies and supporting text. The NCAAP is to be read in conjunction with other Local Plan and Supplementary Planning Documents, specifically the policies of Enfield’s Core Strategy, Proposed Submission Development Management	No change.

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					<p>Document (DMD) Policy 44: 'Protecting Heritage and the Built Environment' provide the appropriate detail of policy guidance for assets of heritage value).</p> <p>Section 3.4: 'A Design-led Approach' (Page 33) does acknowledge that while the area covered by the AAP is largely suburban in character it does include prominent buildings of historical merit. Where such buildings are likely to be affected by the Plan's proposals, for example Opportunity Site 7: 'Arnos Grove Station', development principles within Policy 17 provides specific guidance with regards to this.</p>	
2	Whole Plan /03/001	N/S	N/S	The Highways Agency (HA) will be	Comments noted.	No change.

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	03 – Highways Agency			concerned with proposals that have the potential to impact the safe and efficient operation of the Strategic Road Network. Having reviewed the proposals, the HA do not have any comment at this time.		
3	Whole Plan/04/001 04 – Network Rail	N/S	N/S	No Comments	Noted.	No change.
4	Whole Plan/05/001 05 – Southgate District Civic Trust	N/S	N/S	Generally supportive of the AAP's regeneration objectives. Particularly supportive of the option to retain and protect historic assets in the area and longstanding landmarks such as the Jehovah's Witnesses Hall at Ritz Parade.	Comments noted.	No change.
5	Whole Plan/08/001 08 – Canal & Rivers Trust (CRT)	N/S	N/S	The Canal & Rivers Trust (CRT) have no comments to make as the action plan area does not extend as far as the River Lee Navigation. Strongly support measures to improve the towpath and waterway environment under the North	Comments are noted and the Action Plan promotes improvements and enhancements to the blue ribbon network specifically within the plan boundary.	No change.

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				Circular, but imagine this would be better tackled as part of the Meridian Water proposals. If not, CRT would request the extension of this AAP area.		
6	Whole Plan 09/001 09 – Marine Management Organisation	N/S	N/S	No comments	Noted.	No change.
7	Whole Plan/12/001 12 – Transport for London (Property)	N/S	N/S	Overall Transport for London (TfL) welcomes the general policies and principles set out in the North Circular Area Action Plan (NCAAP). TfL Property has significant land holdings in the areas identified for redevelopment, including along Bowes Road and around Arnos Grove London Underground Station.	Enfield Council acknowledges the land holding interests held by TfL in the Plan area. Specifically, NCAAP has identified Opportunity Site 7 through Policy 17: Arnos Grove Station and makes reference of continuing discussions with TfL for the land currently used for commuter car parking (See Rep No. 60).	No change.
8	Whole Plan /13/001	N/S	N/S	<u>Local wildlife sites</u> If the Area Action Plan covers sites	The area action plan does include some Sites of	No change.

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	13 – Natural England			that are on or adjacent to a local wildlife site, eg Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the Area Action Plan on the local wildlife site, and the importance of this in relation to development plan policies.	Importance for Nature Conservation (SINCs) and Wildlife corridors as shown on the NCAAP Policies Map and on pages 26-27. The biodiversity and open spaces assets of the area are acknowledged on page 39 and within Figs 16, 21 and 29. Cross referencing to the adopted Core Strategy, Biodiversity Action Plan, and the relevant Proposed Submission Development Management policies are also provided.	
9	Whole Plan/14/001 14 – Individual/Resident	N/S	N/S	Raise concerns regarding the Proposed Submission of the North Circular Area Action Plan in a number of areas which include housing density, housing development, adequate provision for education, health services, road	The adopted Core Strategy (2010) established the strategic priorities for the North Circular area which is housing led regeneration strategy and building sustainable communities, with	No change.

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				<p>safety, car parking for new residents and for shops and above all, proper and meaningful consultation.</p> <p>The NCAAP has significant weaknesses which need to be addressed before any planning applications for individual sites are considered and presented to the Secretary of State.</p>	<p>potential to deliver 1500 new homes by 2026. (Core Policy 44. 'North Circular Area'). Core Policy 44 also recognises that the target would be subject to change as both the New Southgate Masterplan (2010) and the North Circular AAP emerged. The NCAAP has now established a housing target of approximately 1,335. Fig 8: 'Capacity Schedule' summarises how the housing densities of each opportunity site have been arrived at. These are approximate calculations, based on the density matrix adopted by the Mayor's London Plan. The Mayor of London has confirmed that the NCAAP is in general conformity with the London Plan.</p>	

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					<p>Parking will be assessed in relation to relevant guidance and policy contained within the London Plan and Enfield's Local Plan, as a starting point, the Council will apply maximum car parking standards as provided in the London Plan.</p> <p>The Area Action Plan provides a clear approach to the supporting community Infrastructure needed to support the area's housing growth (and this is further supplemented in the Council's Infrastructure Delivery Plan update June 2013).</p>	
10	Whole Plan/16/001 16 – Notting Hill Housing	N/S	N/S	Notting Hill is a key stakeholder in the area and has been cognisant of the emerging vision for the area, in	The Action Plan provides the policy framework in which NHHT's site proposals will be	No change.

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	Trust			addition to the development capacities and the likely infrastructure impacts (in relation to education and community facilities for example).	<p>considered.</p> <p>Additionally all development proposals will be assessed in relation to all relevant guidance and policy contained within the London Plan (2011), Enfield's Core Strategy (2010) and the Proposed Submission DMD (July 2013).</p> <p>NHHT's vision document is welcomed as it broadly outlines NHHT's commitment to delivering projects within the Action Plan's framework and policy principles.</p>	
11	Whole Plan/19/001 19 – Broomfield Home-owners Residents Association (BHORA)	N/S	N/S	Respondent is concerned that Notting Hill Housing Trust (NHHT) will have obtained planning approval for all the developments outlined in their 'vision' document before the NCAAP is adopted.	The Action Plan identifies 20 Opportunity Sites for development, of these, 8 are either owned or partially owned by Notting Hill Housing Trust (NHHT) as identified in	No change.

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				<p>Therefore it is difficult to understand how the NCAAP will coordinate changes if NHHT have built houses and flats on every patch of land it owns along the A406. There will be no space for community facilities, health, education etc.</p>	<p>Fig 6 (page 25). Of these, 4 of the 8 sites have planning consent and Site 13: 'Bowes Road sites' is subject to a current planning application.</p> <p>The planning application process for individual sites sits outside of the local plan making process. The local planning authority has limited control over when developers submit applications. However, once submitted, the planning authority has a duty to consider the application on its merits and must have due regard to all existing and emerging national and local planning policies. The individual applications of NHHT have and will continue to be considered in this regard</p>	

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					and in light of emerging North Circular Area Action Plan and Proposed Submission DMD policies.	
12	Whole Plan/24/001 24 - London Assembly Labour Member Joanne McCarthy			The aim of creating sustainable communities, a network of vibrant local commercial centres and community facilities is welcomed. However, there are many concerns that local residents have made regarding the Plan, that I share that will mitigate against such aims.	Comments noted. Section 5: 'Infrastructure Priorities and Delivery Mechanism's explains the Council's approach to the delivery and monitoring of the Area Action Plan's vision and objectives, as well as the realistic phasing of the development and how important infrastructure will be provided. Policy 4: 'Local Education' and Policy 5: 'Provision of Modern Health Care' provides a position on meeting key infrastructure issues for the area.	No change.
13	Whole Plan/22/001			The production of an AAP for the	Comments noted.	No change.

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	22 – Great London Authority			North Circular Road area to provide a more detailed area-specific policy framework for this key part of London's route network is welcomed. The points that have been raised to date by the GLA have been suitably addressed and the document is in general conformity with the Mayor's London Plan.		
Plan Procedure						
14	Plan Procedure /06/001 06 – Individual/Resident	N/S	N/S	Lack of meaningful consultation with the community and the consideration of planning applications for the two sites where Bowes Road and Telford Road meet (Sites 11 & 14: PL-03177PLA & P12-03179) were made before consultation was completed on the NCAAP.	The Council has prepared a Regulation 22 Consultation Statement to support the submission of NCAAP and this set out the various stages of consultation undertaken; details of the issues raised; and how these have been taken into account in the Plan's preparation.	No Change

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					<p>The planning application process of individual sites sits outside of the local plan making process. The local planning authority has limited control over when developers submit applications. However, once submitted, the planning authority has a duty to consider the application on its merits and must have due regard to all existing and emerging national and local planning policies.</p> <p>The individual applications of NHHT have been considered in this regard and in light of emerging North Circular Area Action Plan and Proposed Submission DMD policies.</p>	
15	Plan Procedure/14/002	N/S	N/S	Poor community consultation and planning applications have been	The Council has prepared a Regulation 22 Consultation	No change.

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	14 – Individual/Resident			determined ahead of the NCAAP being agreed and adopted.	<p>Statement to support the submission of NCAAP and this set out the various stages of consultation undertaken; details of the issues raised; and how these have been taken into account in the Plan’s preparation.</p> <p>The planning application process of individual sites sits outside of the local plan making process. The local planning authority has limited control over when developers submit applications. However, once submitted, the planning authority has a duty to consider the application on its merits and must have due regard to all existing and emerging national and local planning policies.</p>	

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					The individual applications of NHHT have been considered in this regard and in light of emerging North Circular Area Action Plan and Proposed Submission DMD policies.	
Section 1 Introduction & Context						
16	Section 1.1/19/002 19 –Broomfield Home-owners Resident Association (BHORA)	N/S	N/S	This document states that local residents are involved with and have been consulted through Enfield’s South West Area Partnership (SWEP). BHORA only found out about this group in 2013. SWEP is not represented by local residents. This document notes some of BHORA’s concerns and suggestions however it fails to address them.	The South West Enfield Partnership is a forum that was established in June 2011. The forum is an area-based steering body involving key landowners, community representatives, local Ward Councillors, local health, education providers, Enfield officers, and officers from influential partner organisations relevant to the area such as; Transport for London, the Chamber of	No change

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					<p>Commerce and the North London Waste Authority. It is an established forum whose remit is to identify particular issues/constraints in the area of a strategic nature. It is not intended to be a resident-led forum, however the forum has welcomed representation from established resident / community groups in the area. The SWEP is not the only forum with whom direct consultation has been undertaken. Local business forums, churches, schools and resident groups have also been directly consulted through focused meetings, sites visits and workshops. The Regulation 22 Consultation Statement for the North Circular Area Action Plan sets</p>	

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					<p>out the methods used for consultation at each stage of the Plan's preparation. The Statement also includes the Council's response to the representations showing how consultation has influenced the Plan. This process has allowed for the alternatives to be raised and considered.</p> <p>The Area Action Plan seeks to highlight the key local issues arising from community consultation in Section 1.1. The policies in the Plan seek, where appropriate and within the remit of the local plan making process, to address these. Policies specifically address concerns raised over development density, community infrastructure,</p>	

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					road capacity, and environment are addressed through the policies of the Plan. The representation does not state which issues have not been addressed.	
17	Section 1.1/23/001 23 – Environment Agency	N/S	N/S	The document should also identify the Bounds Green Brook, running north-south towards the east of the AAP boundary. The brook runs adjacent to the A406 North Circular Road for part of its length, as well as the New Southgate area, and is also partially culverted. It should be mentioned in the NCAAP, because opportunities must be taken to deculvert and enhance this important watercourse where possible.	Agreed to a minor change to acknowledge Bounds Green Brook in the second to last paragraph on page 9.	PPMC 6
18	Section 1.2/19/003 19 –Broomfield Home-owners Resident	N/S	N/S	Housing-led regeneration is unimaginative. This is not endorsed by community consultation. The community has requested better	The North Circular Area Action Plan seeks to positively contribute towards implementing the vision and	No change

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	Association (BHORA)			<p>shops, improved health facilities, leisure facilities, longer library opening hours at Bowes Rd library, more school places, fly tipping to be removed, streets to be swept regularly. BHORA understand that something has to happen to encourage the private sector to invest in the area but question the quality of what is being built.</p> <p>Socio-Economic Context This document highlights Bowes Ward as having higher than borough average of 25-64 year olds. This document fails to show how 'housing-led regeneration' will create local, well paid, meaningful work. Part of the Ladderswood (New Southgate Industrial Estate) that provides work is now to be demolished, making way for more housing. This section of the NCAAP proposed draft submission gives a</p>	<p>objectives of the Mayor's London Plan and implement the Spatial strategy and objectives of Enfield's adopted Core Strategy, in particular the regeneration priorities, including: securing new housing, jobs and facilities for Enfield's growing population; and meeting local development needs.</p> <p>The adopted Core Strategy (2010) established the strategic priorities for the North Circular area which is housing led regeneration strategy and building sustainable communities, with potential to deliver 1500 new homes by 2026. (Core Policy 44. 'North Circular Area'). This will help to regenerate the deprived and blighted parts of</p>	

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				fair assessment of the area.	<p>the NCAAP area and make use of previously developed and land. There would also be additional benefits: refurbished and redeveloped buildings would be constructed to higher environmental standards; the redevelopment of the blighted parts of the road corridor; and some development will provide for a mix of uses that will include new provision for local services and facilities. New development along the road corridor should also help to mitigate against the negative environmental impacts of the road corridor for existing residents, acting as a buffer.</p> <p>In reference to Ladderswood industrial estate, the release</p>	

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					of part of the New Southgate Local Industrial Estate was accepted through the Core Strategy examination in 2010 to facilitate the estate renewal at Ladderswood. However, the remainder of the estate and Regents Avenue Industrial Estate (to the far east of the corridor) continue to be protected for employment. The 3 Neighbourhood Places also seek to further expand employment opportunities.	
19	Section 1.2 The North London Waste Plan/15/001 15 – North London Waste Authority (NLWA)	N/S	N/S	3 points raised: 1. Planning application at Pinkham Way was withdrawn therefore reference no longer correct. 2. Additional homes planned for in the area will create additional waste that will need to be appropriately accommodated. 3. NLWA would not consider	Since the publication of the proposed submission document the planning application at Pinkham Way was withdrawn as was the North London Waste Plan. It is agreed that the Action Plan would benefit from a minor change to reflect the current	PPMC 8.

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				additional new homes in proximity to the Pinkham Way site is inconsistent with the development of a modern waste facility and development on the south west corner of the NCAAP would be shielded from any proposed development on Pinkham Way.	status of both.	
Section 2 Vision and Spatial Strategy						
20	Section 2 /19/004 19 –Broomfield Home-owners Resident Association (BHORA)	N/S	N/S	2.0 The North Circular Vision and Spatial Strategy Over-development does not create sustainable communities. Designs Notting Hill Housing Trust (NHHT) have presented are not supported.	The vision and spatial strategy of the Plan (page 17) is to provide a range of facilities, services and places that support sustainable local communities and resident needs along the road corridor. Section 3 of the Action Plan	No change.

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					identifies the key principles for creating sustainable neighbourhoods and recognises that the corridor has a blend of uses including homes, shops, schools, local health facilities, employment opportunities, local libraries, and leisure and open spaces. This mix creates a diverse foundation on which to build sustainable communities.	
21	2.2 Objective 2/ 06/002 06 Individual/Resident	N/S	N/S	The NCAAP (page 17) hopes to provide more jobs yet there is nothing in the report to indicate either how or where this aim is achievable. Indeed, there is an indication that the “locally significant industrial site” at the junction of Station Road and the A406 is to close, but no consideration appears to have been given to how to relocate the	The Council reviewed evidence base specific to designated employment sites in the area through the Employment Land Review Update 2012 in order to assess long term viability. The Study assessed both Locally Significant Industrial Sites (LSIS) in the NCAAP area and for both Regents Avenue and the remainder of New	No change.

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				<p>businesses and the staff in accordance with the aims set out on page 30.</p> <p>The NCAAP is principally about increasing housing.</p>	<p>Southgate Industrial Estate continues to support their LSIS designations. Outside of the industrial estates, job creation will come forward in the 3 Neighbourhood Places and through the mixed use opportunity sites.</p> <p>The corridor is predominantly residential, however Policy 3: 'Creating and Protecting Local Jobs in the North Circular Area' the commitment to providing new employment opportunities is addressed. One of the objectives of the Plan is to ensure growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses and addresses the impact of</p>	

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					growth on residential amenity whilst seeking to enhance the local economic profile of the area.	
22	Section 2.2 /19/005 19 –Broomfield Home-owners Resident Association (BHORA)	N/S	N/S	2.2 Objectives Anticipate the majority of flats will be purchased by landlords rather than local residents looking to purchase their first home. This will not help build sustainable communities.	The Plan's objectives include supporting suburban residential communities that live alongside one of London's principal distributor roads. The area should continue to provide a wide range of choices in terms of living accommodation. The NCAAP area benefits from a wide spectrum of house types and prices and the sites identified in the Plan seek to provide for a range of residential types, as detailed in Fig 8 - 'Capacity Schedule' for each Opportunity Site.	No change.
23	Policy 1 North Circular Area Action Plan Area	N/S	N/S	Question how new space can be created with so much planned	Policy 6: 'High Quality Design of New Development'	No change

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	<p>Key elements of the spatial framework /19/006</p> <p>19 –Broomfield Home-owners Resident Association (BHORA)</p>			<p>development. This document fails to detail what is meant by ‘high quality development’.</p>	<p>provides a design led approach to new development and public realm interventions. Particular focus is given to addressing the urban context of the North Circular corridor and reinforcing local distinctiveness. However, the Action Plan intentionally does not seek to be overly prescriptive as development proposals will be assessed on their own merits, within their own context and with reference to existing guidance and other relevant local plan policies.</p>	

Section 3 Our Approach – Building for Sustainable Neighbourhoods

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24	Section 3.1/19/007 19 –Broomfield Home-owners Resident Association (BHORA)	N/S	N/S	The area is in great need of: improved shopping facilities, employment and leisure facilities. Bowes Road Library should be extended into the building below plus increased opening hours. With 1000's of new people moving into the area the library service must be increased. BHORA oppose any plans to build on the small plot of land in front of the library.	Section 3 of the Plan identifies the key principles for creating sustainable neighbourhoods and recognises that the corridor already has a blend of uses including homes, shops, schools, local health facilities, employment opportunities, local libraries, leisure and open spaces. This mix creates a foundation for creating a more interesting corridor, with lively and active neighbourhood places. Policy 4: 'Local Education' and Policy 5: 'Provision of Modern Health Care' (provides a position on meeting key infrastructure issues for the area). Policy 11: 'Three Neighbourhood Places' outlines the key community priorities that each will	No change.

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					deliver. Enhanced community / leisure provision is designated for both library sites within the NCAAP area, in accordance with the adopted New Southgate Master Plan (2010) and Southgate Town Hall Planning Brief (2011). No proposals to build in front of Bowes Library are proposed. Fig 16 identifies this area as valuable open space.	
25	Policy 2 New and Refurbished Homes/14/002 14 – Individual/Resident	N/S	N/S	The development of some sites involve 6 storey blocks of flats, which will be strange in an area of mainly 2-storey, 3-bed properties. Terraced houses would be more in keeping with the area. The London Plan states “The design of all new housing developments should enhance the quality of local places, taking into account physical context local character and density”.	Policy 6: ‘High Quality Design of New Development’ and Policy 7: ‘Building Heights and Development Densities’ provide a design led approach to new development and public realm interventions. Particular focus is given to addressing the urban context of the North Circular corridor and reinforcing local	No change.

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					distinctiveness. The Plan intentionally does not seek to be overly prescriptive as development proposals will be assessed on their individual merits, within their own context and with reference to existing guidance, studies and other local plan policies.	
26	Figure 6: Site name, description and ownership18/001 18 - Savills on behalf of Legal & General and National Grid		Viability	Recommend the Description of Opportunity for sites 2, 3 and 4 in Figure 6: Western Gateway should be reworded to read, " <i>Mixed use high density development including leisure and retail, housing, and community facilities</i> ".	Text amended within Figure 6 to further clarify the mix of land uses proposed for the three sites that make up the Western Gateway site.	PPMC 12.
27	Policy 2 New and Refurbished Homes/24/002 24 - London Assembly Labour Member	N/S	N/S	London needs more housing however, this area is already densely populated and lacks green space and facilities, such as adequate health and school provision.	Policy 4: 'Local Education' and Policy 5: 'Provision of Modern Health Care' provides a position on meeting key infrastructure issues for the area. Policy 11: 'Three	No change

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	Joanne McCarthy			Recent planning applications submitted by Notting Hill Housing Trust considered to be “cramming” many people into new flats which will add further unbearable pressure on local services.	Neighbourhood Places’ outlines the key community priorities that each will deliver in terms of community infrastructure and services. In considering the recent planning applications of Notting Hill Housing Trust, the Development Management officer will have had regard to emerging as well as adopted local plan policies and development standards.	
28	Policy 3 Creating and protecting local jobs in the North Circular Area/19/008 19 –Broomfield Home-owners Resident Association (BHORA)	N/S	N/S	The Council has already accepted the partial loss of New Southgate Industrial Estates, failing to protect local jobs in the area.	Some release of the New Southgate Local Industrial Site was accepted through the Core Strategy examination in 2010 to facilitate the estate renewal at Ladderswood. However, the remainder of the estate and Regents	No change

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					<p>Avenue Industrial Estate continue to be protected. The three Neighbourhood Places also seek to expand employment opportunities.</p> <p>NCAAP Policy 3: 'Creating and Protecting Local Jobs in the North Circular Area' addresses these issues in a positive way. One of the objectives of the Plan is to ensure growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses and addresses the impact of growth on residential amenity whilst seeking to enhance the local economic role of the area.</p>	
29	Policy 3: Creating and protecting local jobs in	N/S	N/S	The opportunity to create jobs locally is important; there is little	The Action Plan includes policies that would seek to	No change

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	<p>the North Circular Area/24/003</p> <p>24 - London Assembly Labour Member Joanne McCarthy</p>			<p>detail in the Plan as to how this will be achieved. Residents are concerned that employment will reduce and existing commercial premises have already and will be lost as a result.</p> <p>Has the Borough set targets regarding local labour that will be used in the construction of these new developments?</p>	<p>provide new and improved business accommodation directly, as well as those that would look to improve conditions more generally and make the area more attractive for businesses. Policy 3 would seek to help create and protect local jobs, and other policies, such as Policy 13: 'Ladderswood', Policy 14: 'Western Gateway' and Policy 30 'Old Labour Exchange', would contribute directly towards the provision of new commercial floorspace in specified locations. Other NCAAP Opportunity Sites for mixed use and community uses would provide further opportunities. The continued protection of Regents Avenue Industrial Estate and the</p>	

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					<p>remaining portion of New Southgate Industrial Estate by the Action Plan.</p> <p>The adopted S106 SPD (2011) sets out the Council's approach to securing local labour in construction initiatives as part of major developments.</p>	
30	<p>Section 3.3 Community Infrastructure/19/009</p> <p>19 –Broomfield Home-owners Resident Association (BHORA)</p>	N/S	N/S	Respondent questions whether S106 contributions will be ring-fenced to the NCAAP area.	<p>Section 5: Infrastructure Priorities and Delivery Mechanisms sets out the approach to local infrastructure delivery. S106 contributions will be negotiated on development schemes to support local infrastructure requirements.</p> <p>Adopted Core Strategy Policy 46: (Infrastructure) outlines the Council's policy for</p>	No change.

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					requiring contributions from developments towards infrastructure costs. It refers to the Council's intention to introduce CIL and in the meantime to continue secure S106 contributions.	
31	Section 3.3 Community Infrastructure/20/001 20 – Barnet Council	N/S	N/S	Support the NCAAP approach towards community facilities and in particular education. However, concerned that the net gain of 1,335 units identified will lead to further pressure on Barnet's schools, in particular the demand for primary school places. Note that the expansion of local education will specifically be provided at Garfield Primary School, concerned that the Proposed Submission draft of the NCAAP is still exploring the feasibility of this expansion at this late stage in the	The comments from the adjoining authority are noted as being ongoing cross-borough issues. The Plan area is bounded by Haringey to the south and Barnet to the west; therefore it is equally possible that the regeneration of the area could also attract pupils from Haringey and Barnet, increasing demand in Enfield in the immediate area and beyond. The Plan reflects the current situation with regards to the	No change.

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				document's production.	Council's approach for future primary and secondary schools places. Policy 4: 'Education' confirms Enfield's commitment to creating additional school places. Since the Proposed Submission publication, expansion plans for Garfield School continue to progress and NCAAP is intentionally left flexible to allow plans for the School to develop and provide the appropriate framework for delivering additional school places. The Policy and supporting text make reference to needing to work with adjoining boroughs.	
32	Section 3.3 Community Infrastructure/16/002	N/S	N/S	Page 30, Section 3.3 refers in the third bullet point to a minimum of 600 sqm of new community	The Council's Infrastructure Delivery Plan (IDP) 2013 update reflects the current	No change

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	16 – Notting Hill Housing Trust			<p>facilities to be delivered on the ground floor of new development at the Wilmer Way / Bowes Road junction. The planning approval (subject to a S106 agreement) provides for 230 sqm of community floorspace. Following a detailed assessment of the available space and what could be accommodated in terms of highway impact, this is the optimum provision. It would be useful therefore to understand how the 600 sqm figure was arrived at.</p> <p>Policy 22, point 3 refers to a community use of approximately 600 – 1,200 sqm. This figure is inconsistent with that expressed on page 30 of the document (see above) and the scheme which has a resolution on this site. The approved scheme provides three storey mews style housing along the</p>	<p>position statement on the AAP’s infrastructure requirements. The key local infrastructure requirements and their means of delivery across the North Circular area have been identified throughout the document and pulled together in Section 5: ‘Key Infrastructure Requirements’.</p> <p>The figure of 600 - 1200sqm at the Wilmer Way / Bowes Road junction, Site 11 and Policy 22 is a figure based on a ground floor footprint on this corner site of approximately 1,000 sqm gross. The 600sqm is therefore a reflection of a reasonable proportion of the ground floor of a building. The approach provides for both</p>	

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				boundary with Broomfield School, and therefore Point 1 should be updated.	<p>ground and first floor accommodation. Policy 22 seeks to secure a reasonable proportion of the site for community space and this will continue to be negotiated through the detailed assessment of planning applications.</p> <p>The policy approach to secure a non-residential use for the Wilmer Way / North Circular Road junction seeks to address the immediate environment of the busy junction and footbridge. While a planning scheme has been approved, (subject to S106 negotiations) it has yet to be built, therefore the Policy aspiration remains and there is no justification to update the Policy to align to</p>	

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					the consented scheme.	
33	Section 3.3 Community Infrastructure/24/004 24 - London Assembly Labour Member Joanne McCarthy	N/S	N/S	Local residents are rightly concerned that the right mix and capacity of retail and public services are forthcoming. Urgent need for better health services (GP and dentistry) in the area and buy-in from local health commissioners should be gained as soon as possible.	Enfield Council continues to work closely with all healthcare providers to understand and support the local health care needs of residents and physical provision across the local area. Additional healthcare provision is supported and identified on several NCAAP opportunity sites, Coppicewood Lodge, (site 6), Southgate Town Hall (site 14) and the expansion of provision at Arnos Grove Medical centre site / Bowes Library (site 8). Additionally health services would also be supported within the Bowes Road and Green Lanes Neighbourhood Places.	No change.

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34	Policy 4 Local Education/ 06/003 06 – Individual/Resident	N/S	N/S	Although requirements for school places are said to be covered by expansion at Garfield and Broomfield schools provision is stretched in the wider area adjacent to that covered by the NCAAP. Demand for schooling in Southgate Green Ward has already been shown to be inadequate and the expansion envisaged may still not meet future demand.	The Plan reflects the current situation with regards to the Council’s approach for future primary and secondary school places, and this will continue to be kept under review through the relevant Council programmes and strategies.	No change
35	Policy 4 Local Education/19/010 19 –Broomfield Home-owners Resident Association (BHORA)	N/S	N/S	Plans to increase the size of Garfield School to accommodate new families on the Ladderswood Estate had been rejected by the governors. There is already massive pressure on local schools, LBE are not addressing the issue. An all-through school on the site of Broomfield School should be considered.	The need for two additional forms of entry primary school places is identified early on Page 11 of the Plan, and references to additional provision are made throughout the document, in particular at Policy 4: ‘Education’. Plans to provide additional capacity at Garfield School are	No change.

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					<p>continuing to progress. The respondent is referring to earlier proposals for Garfield School that have been superseded.</p> <p>The Council continues to discuss opportunities with Broomfield School.</p>	
36	<p>Policy 4 Local Education 14/003</p> <p>14 – Individual/Resident</p>	N/S	N/S	<p>Over the last 15 years or so, the Council has been unable to allocate school places to pupils in their catchment area. With the increase of population planned, the expansion of Garfield and Broomfield schools will certainly not be sufficient.</p>	<p>The pressure for school places is not just a local issue for the housing growth planned in the NCAAP area, but is also a borough and London-wide issue related to population projections and the rise in birth rates and migration.</p> <p>The need for two additional forms of primary school entry places is identified early on Page 11, and references to additional provision is made throughout the document, in</p>	No change.

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					<p>particular at Policy 4: 'Education'.</p> <p>The Plan reflects the current situation with regards to the Council's approach for future primary and secondary schools places, and this will continue to be kept under review through the relevant Council programmes and strategies.</p>	
37	<p>Policy 4 Local Education 24/005</p> <p>24 - London Assembly Labour Member Joanne McCarthy</p>	N/S	N/S	<p>There is also a lack of primary school places in the wider area which has led to local children not gaining a place at their local school. This needs urgent attention, more housing will lead to further strain.</p>	<p>The pressure for school places is not just a local issue for the housing growth planned in the NCAAP area, but is also a borough and London-wide issue related to population projections and the rise in birth rates and migration.</p> <p>The need for two additional forms of primary school entry</p>	No change

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					<p>places is identified early on Page 11, and references to additional provision are made throughout the document, in particular at Policy 4: 'Education'.</p> <p>The Plan reflects the current situation with regards to the Council's approach for future primary and secondary schools places, and this will continue to be kept under review through the relevant Council programmes and strategies.</p>	
38	<p>Policy 5 Provision of Modern Healthcare/06/004</p> <p>06 – Individual/Resident</p>	N/S	N/S	<p>With the recent creation of the Enfield Clinical Commissioning Group (CCG) it is essential for liaison to be established by SWEP between the Council, residents and the Commissioning Group to ensure good health provision in the area.</p>	<p>The Council continues to work closely with all healthcare providers, including the new local Clinical Commissioning Group (CCG), to understand and support the local health care needs and physical provision across the area.</p>	No change.

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					<p>Policy 5: 'Provision of Modern Health Care' provides a position on meeting the physical infrastructure requirements for the area. Additional healthcare provision is supported and identified on opportunity sites, Coppicewood Lodge, (Site 6), Southgate Town Hall (site 14) and the expansion of provision at Arnos Grove Medical centre site / Bowes Library (site 8). Additionally health services would also be supported within the Bowes Road and Green Lanes Neighbourhood Places.</p>	
39	Policy 5 Provision of Modern Healthcare/19/011	N/S	N/S	Walk-in Centre at Coppice Wood Lodge supported.	Comments noted	No change

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	19 –Broomfield Home-owners Resident Association (BHORA)					
40	Policy 5 Provision of Modern Healthcare 14/004 14 – Individual/Resident	N/S	N/S	The health service is already under immense strain and no significant proposals will alleviate the problem let alone deal with the expected increase of population.	Policy 5: ‘Provision of Modern Health Care’ provides a position on meeting the physical infrastructure requirements for the area. Additional healthcare provision is supported and identified on opportunity sites, Coppicewood Lodge, (Site 6), Southgate Town Hall (site 14) and the expansion of provision at Arnos Grove Medical centre site / Bowes Library (site 8). Additionally health services would also be supported within the Bowes Road and Green Lanes Neighbourhood Places.	No change
41	Section 3.4 A design-led	N/S	N/S	The area has been ignored for many	The detailed comments of the	No change.

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	<p>approach/19/012</p> <p>19 –Broomfield Home-owners Resident Association (BHORA)</p>			<p>years for many reasons. A design led approach has not been implemented to date when considering recent additions to the area including the new footbridge, poor tarmac, surfacing and weak green planting.</p>	<p>representation have been noted and relate specifically to the road safety and environmental improvement scheme implemented by TfL. Going forward, the Area Action Plan’s objective is to deliver a high quality environment as articulated in Policy 6: ‘High Quality Design of New Development’. This Policy is relevant to not only new development but also public realm improvements.</p>	
42	<p>Policy 7 Building Heights and Development Densities /06/005</p> <p>06 – Individual/Resident</p>	N/S	N/S	<p>The London Plan notes that it is not appropriate to apply PTAL’s mechanistically and that its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential. PTAL’s provide an indication of transport accessibility and by</p>	<p>Making the most efficient and best use of Enfield’s limited land is promoted in locations well served by public transport as set out in Enfield’s Core Strategy and the Mayor’s London Plan Policy. The North Circular Area Action Plan applies the density ranges as</p>	No change.

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				<p>formula an indication of the number of housing units that are appropriate to a location. However, there seems to be no direct connection between PTAL's and population densities.</p> <p>On page 35 of the NCAAP it is argued that "... there are no other locations or sites considered appropriate for tall buildings ... and that it may therefore be appropriate ... for building heights of high quality new development to be one or two storeys above the neighbouring buildings ..."</p> <p>It is a similar case with Mews developments. The Council's position on backland development is recorded on page 35 of the NCAAP and these accords with The London Plan. Yet, on both Sites 11</p>	<p>set out in the London Plan. Fig 8 (page 28 -29) provides a capacity schedule of Opportunity Sites based on the density matrix provided by the Mayor's London Plan. PTAL data is supplied by Transport for London (TfL) to measure ease of access to the public transport network. In assessing a site's development capacity, a site-specific PTAL assessment is carried out. However, the Council accepts that PTAL is not the only consideration that would determine a site's appropriate density. Other factors such as a site's accessibility to facilities and services, the impact on existing development, and the needs of new development are equally considered.</p>	

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				and 13 backland development is proposed with no credible justification.	<p>Further guidance on this is detailed in the policies of the Proposed Submission Development Management Document.</p> <p>For planning purposes, density ranges are expressed in habitable rooms per hectare and in units per hectare, not people per hectare.</p> <p>The approach to considering the appropriateness of new building heights will be a considered at a detailed planning and design stage. The Plan is clear that the area represents limited opportunity for 'tall buildings'. Building heights of one or two storeys higher than any adjoining buildings are not considered</p>	

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					<p>to be a 'Tall Building'. Further guidance and criteria is set out in adopted Core Strategy and London Plan policies and the Proposed Submission DMD policies as referenced on page 35.</p> <p>Of the 20 Opportunity Sites identified, Site 11 is seen as the only appropriate exception to resisting backland development identified within the Plan. Site 13 is not considered backland development.</p>	
43	<p>Policy 7 Building Heights and Development Densities /14/005</p> <p>14 – Individual/Resident</p>	N/S	N/S	<p>In an already overpopulated area, some of the proposed developments will mean an increase of population of anywhere between 100% - 250%. This increase will automatically have an impact on provision of primary and secondary</p>	<p>Accommodating housing and population growth is being addressed borough-wide. Enfield's adopted Core Strategy (2010) sets out the borough-wide spatial strategy. In particular the regeneration</p>	No change.

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				education, health services, and car parking. The Council should consider other areas inside the borough where density (population/hectars) is significantly below the borough average?	priorities including: securing new housing, jobs, facilities for Enfield's growing population and meeting local development needs in different areas of Enfield. Enfield's adopted housing growth target is 11000 new homes borough-wide up to 2026. Specifically, Core Policy 2: 'Housing Supply and Location of New Homes' adopts an indicative target of 1500 new homes for the North Circular Regeneration Area.	
44	Policy 7 Building Heights and Development Densities /24/006 24 - London Assembly Labour Member Joanne McCarthy	N/S	N/S	Height of some proposed developments has elicited a hostile response from local residents. Although this area surrounds the A406 it is still very much a residential area, and high rise developments, in an area that is predominantly two-storey,	Key Spatial Element 2 on page 19 sets out the need to protect the varying character of the urban and suburban residential character of the area. The supporting paragraph under Policy 7: 'Building	No change.

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				suburban dwellings will detract from this residential suburban feel.	<p>Heights and Development Densities' also acknowledges the area is generally characterised by low rise residential. Appropriate locations for tall buildings are detailed through the work undertaken to inform the adopted New Southgate Masterplan, at (Ladderswood and the Western Gateway site) given existing building heights and location. However beyond this, the Plan only supports buildings heights of one or two storeys above neighboring buildings and only in appropriate locations (the three Neighbourhood Places and identified points of transition).</p> <p>The appropriateness of taller</p>	

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					buildings will be assessed in consideration of criteria as set out in the adopted Core Strategy, London Plan policies and the Proposed Submission DMD policies as referenced on page 35 of the NCAAP.	
45	Section 3.3 Connecting the North Circular/20/002 20 – Barnet Council	N/S	N/S	NCAAP abandons the historical safeguarding allocation of land along the A406 North Circular Road between Bounds Green Road and Green Lanes. Removing this safeguarding appears to be inconsistent with Enfield’s Core Strategy. Without any safeguarding will grade separation be possible? Enfield’s adopted Core Strategy evidenced that strategic growth could be delivered within the plan period despite the significant capacity constraints on this stretch of the North Circular. Barnet	The historical North Circular Road safeguarding issue has been a longstanding and somewhat complex one that has unfortunately blighted the area for over 40 years. The Highways Agency (HA) scheme of 1987 never progressed. The Core Strategy continued to reflect the broad extent of the original HA “inherited” scheme in the absence of an agreed position / commitment to an “intermediate” scheme	No change.

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				<p>Council would like to point out that the removal of the safeguarding could constrain future growth in Enfield and adjacent boroughs, including Barnet in future plan periods.</p>	<p>between TfL and Enfield Council.</p> <p>Since the adoption of the Core Strategy, in 2010, TfL transferred the majority of land safeguarded to Notting Hill Housing Trust (NHHT). Ultimately the transferal of land to NHHT addressed much of the uncertainty over future “inherited or “intermediate” scheme proposals. NHHT acquired 400 property interests from Transport for London in April 2010.</p> <p>The NCAAP is the appropriate opportunity for Enfield Council to provide an updated local planning position on a key issue that has played a major contribution to the area’s</p>	

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					<p>blighted state.</p> <p>Enfield Council has no evidence or justification to support the continuation of an “inherited” safeguarding of land as illustrated on the Core Strategy Policies Map. However, Policy 8: Transport (page 35 and 36) updates the position further and makes clear that any capacity improvements to the road network will continue to be sought and discussions with TfL will remain open.</p> <p>The approach taken in the Plan has been developed in consultation with TfL and has the support of the GLA.</p>	
46	Section 3.3 Connecting	N/S	N/S	Object to removal of historical	The historical North Circular	No change.

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	<p>the North Circular/07/001</p> <p>07 – Federation of Enfield Residents and Allied Associations (FERAA)</p>			<p>safeguarding. Short sighted and unwise policy as it would permanently remove the possibility of the construction of a more substantial and effective (in terms of capacity) road scheme.</p>	<p>Road safeguarding issue has been a longstanding and somewhat complex one that has unfortunately blighted the area for over 40 years. The Highways Agency (HA) scheme of 1987 never progressed.</p> <p>The Core Strategy continued to reflect the broad extent of the original HA “inherited” scheme in the absence on an agreed position / commitment to an “intermediate” scheme between TfL and Enfield Council.</p> <p>Since the adoption of the Core Strategy, in 2010, TfL transferred the majority of land safeguarded to Notting Hill Housing Trust (NHHT). Ultimately the transferal of</p>	

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					<p>land to NHHT addressed much of the uncertainty over future “inherited or “intermediate” scheme proposals. NHHT acquired 400 property interests from Transport for London in April 2010.</p> <p>The NCAAP is the appropriate opportunity for Enfield Council to provide an updated local planning position on a key issue that has played a major contribution to the area’s blighted state.</p> <p>Enfield Council has no evidence or justification to support the continuation of an “inherited” safeguarding of land as illustrated on the Core Strategy Policies Map. However, Policy 8: Transport</p>	

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					<p>(page 35 and 36) updates the position further and makes clear that any capacity improvements to the road network will continue to be sought and discussions with TfL will remain open.</p> <p>The approach taken in the Plan has been developed in consultation with TfL and has the support of the GLA.</p>	
47	<p>Policy 8 Transport and movement in the NCAAP Area/06/006</p> <p>06 – Individual/Resident</p>	N/S	N/S	<p>Issues of safety need to be included in the NCAAP. The following have been noted:</p> <p>a. A406: Pedestrian crossing points all along the road are hazardous owing to the priority given to vehicular traffic over pedestrians.</p> <p>b. Site 11: The failure to provide pavements with the mews development on this site makes the mix of vehicles and</p>	<p>Section 3.5: ‘Connecting the North Circular’ makes reference to TfL’s recently completed safety and environmental road improvement scheme. The Council acknowledges the implemented scheme has raised a number of ‘snagging’ issues of considerable concern to residents in the local</p>	No Change

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				<p>pedestrians/children another hazard.</p> <p>c. Site 13: Access to and from Powys Lane will prove difficult given the weight of traffic and tailbacks at the lights caused by the limited time allowed for vehicles to cross the A406.</p> <p>d. Site 10: the very plan to develop so close to a dangerous bend on the A406.</p> <p>Car Parking for Housing: It is noted that inadequate parking provision is planned for in Notting Hill Housing Trust's approved planning applications.</p> <p>Parking at Shops No apparent provision is included for vehicular access and parking at shops for deliveries or shopping.</p>	<p>community. Enfield Council, in its capacity is raising the issues directly with TfL. The issue sits outside the local plan process.</p> <p>The individual design proposals and car parking standards for sites raised in points b– d are more appropriately addressed through the detailed assessment of the planning applications It should be noted that London Plan car parking standards are 'maximum' standards. Further guidance on the application of standards is provided through Proposed Submission DMD Policy 45.</p> <p>The issue of parking provision for shops is noted and is</p>	

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					possibly in reference to the parking bays lost as a result of the implementation of TfL's safety and environmental road improvement scheme at Ritz Parade. Policy 23: Ritz Parade supports bringing capacity back and creating additional parking for local businesses.	
48	Policy 8 Transport and movement in the NCAAP Area/14/006 14 – Individual/Resident	N/S	N/S	Road Safety There have been a number of road accidents only some of which have been reported since the opening of the North Circular Road improvement scheme. Car Parking Allocation of car parking for the new housing falls significantly below GLA requirements.	Section 3.5: 'Connecting the North Circular' makes reference to TfL's recently completed safety and environmental road improvement scheme. The Council acknowledges the implemented scheme has raised a number of 'snagging' issues of concern to the local community. Enfield Council, in its capacity is raising the issues directly with TfL. The issue sits	

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					<p>outside of the local plan process.</p> <p>Car parking standards are more appropriately addressed through the detailed assessment of planning applications. It should be noted that London Plan Car parking standards are 'Maximum' standards. Further guidance on the application of standards is provided through Proposed Submission DMD Policy 45.</p>	
49	<p>Policy 10 Open Spaces, Waterways and the Blue Ribbon Network/06/007</p> <p>06 – Individual/Resident</p>	N/S	N/S	<p>Parks: The NCAAP highlights the lack of open spaces in certain areas, but makes no recommendation for better use of existing open space, especially Arnos Park.</p> <p>Water Ways: The report says (Page 85) that the New River is a valuable local amenity and recommends that</p>	<p>One of the NCAAP's objectives includes identifying opportunities to improve publicly accessible open and green spaces and the blue ribbon network. The Plan establishes an approach to Greening the corridor through</p>	<p>PPMC 52</p> <p>Policy 26: Southgate Town Hall amend final supporting paragraph to reference the</p>

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				<p>the route along it is strengthened. Few people walk along the New River feels isolated and unsafe between access points. It should be noted that the New River can be accessed at Southgate Town Hall contrary to what is recorded on Page 89.</p>	<p>Section 3.6 (Page 37). Core Strategy Policy 34: 'Parks, Playing Fields and Other Open Spaces' sets out the Council's approach to protecting and enhancing existing open space.</p> <p>The AAP supports enhancing the waterways to make them more attractive to use and access, so that current issues of isolation and safety can be overcome.</p> <p>The point about accessing the New River at Southgate Town Hall is noted. Policy 26: Southgate Town Hall and final supporting paragraph amended to reference the New River can be accessed.</p>	<p>New River can be accessed.</p>

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50	Policy 10 Open Spaces, Waterways and the Blue Ribbon Network/24/007 24 - London Assembly Labour Member Joanne McCarthy	N/S	N/S	There must be adequate play space which children can walk to without crossing the busy A406.	The urban analysis section of the NCAAP identifies the principal open spaces in the area and opportunities where either enhanced provision and / or improved access should be prioritised. In terms of individual sites, Policies 13 'Ladderswood' and Policy 24 'Bowes Road Sites' (Powys Lane to Broomfield Road) would make significant and positive on site contributions to open space. The application of how individual development proposals should contribute towards open space provision is established through Core Strategy Policy 34: 'Parks, Playing Fields and Other Open Spaces' and Proposed Submission DMD73:	No change.

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					'Children's Play Space'.	
51	Section 3.6 Greening the North Circular/19/013 19 –Broomfield Home-owners Resident Association (BHORA)	N/S	N/S	3.6 Greening the North Circular Policy 9. Landscaping and biodiversity proposals will play a vital role not an 'important role' in managing noise and air pollution. Imaginative landscaping, the incorporation of broad leaf trees and shrubs with colour would be a key to creating a 'sustainable neighbourhood'.	The Plan's objectives include identifying opportunities to improve publicly accessible open and green spaces and the blue ribbon network. The Plan establishes an approach to Greening the corridor through Section 3.6 (Page 37). Adopted Core Policy 34: 'Parks, Playing Fields and Other Open Space' sets out the Council's approach on protecting and enhancing existing open space.	No change
52	Section 3.6 Greening the North Circular/ Climate Change /18/001 18 - Savills on behalf of Legal & General/National Grid	No	Viability	The requirement for a district heating network as part of the NCAAP Area is understood. However, creating a financially viable development is vital to the redevelopment of the Western Gateway Site, therefore, including a	The NCAAP provides sufficient flexibility as drafted to take account of viability considerations. The approach is supported by the Council's evidence base 'Renewable Energy and Low Carbon	No change

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				district heating network as part of the redevelopment should be subject to viability considerations and should not limit the options for providing a financially viable and deliverable development.	Development Study' (2010). Planning proposals will be assessed against existing and emerging Local Plan documents, including the Proposed Submission DMD policies, and particularly DMD 52: 'Decentralised Energy Networks' (DENs), requires major applications to implement the Mayor's energy hierarchy, encourages the provision of and low and zero carbon technologies and sustainability measures. Technical feasibility and financial viability issues are addressed in this more detailed policy.	
53	Section 3.6 Greening the North Circular/ Climate Change /24/008	N/S	N/S	A real opportunity missed to add significant greening to this corridor during the recent widening of the A406. However, if development is to	The recent road widening referred to by the representation relates to TfL's recently implemented Safety	No change.

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	24 - London Assembly Labour Member Joanne McCarthy			take pace the environmental impact on and look of the area must be given high importance.	<p>& Environmental Improvement Scheme. Some improvements to landscaping and streetscape have been introduced. The NCAAP promotes further environmental improvements to be secured through development opportunities. The area's landscape would be positively impacted through Policy 10, which would direct contributions for new developments towards key improvements to the existing network of open spaces, and, in particular, those identified opportunities alongside waterways.</p> <p>More generally, the policies would have a significant positive impact cumulatively,</p>	

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					because they would promote the redevelopment of vacant land and derelict buildings. This would help to transform blighted areas into places that contribute successfully towards the area's landscape and townscape.	
Section 4 Environmental Context and the Three Neighbourhood places						
54	Section 4.4 Public Realm and open space (Fig 160/23/002 23 – Environment Agency	N/S	N/S	Failure to mention Bounds Green Brook within the context of opportunities for improvements to open spaces next to the brook.	Amendment made via PPMCs to recognise Bounds Green Brook.	PPMC39 & PPMC 40
55	Policy 12 Arnos Grove / New Southgate Neighbourhood place / 10/001 10 – New Ladderswood		Unsound	Amend policy to include the New Southgate Industrial Estate as a development site 1a for residential-led mixed-use development and to specifically include an element of B1 employment development,	The remaining element of New Southgate Industrial Estate continues to be designated a Local Strategic Industrial Site (LSIS). The NCAAP is not	No change

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	LLP			following the principles accepted by the Council on the adjacent existing Ladderswood Estate opportunity site. The Policy should also specify a need to ensure that the New Southgate Industrial Estate site is fully integrated within the wider Ladderswood Estate proposals to ensure enhanced connectivity and deliver a sustainable mixed-use community.	proposing any change to the adopted employment use of this site and therefore the relevant policies of the adopted Core Strategy and Proposed Submission DMD apply. The release of 3000sqm of adjacent employment floorspace from the former New Southgate Industrial Estate was accepted through the Core Strategy adoption in 2010. This was part of a rationalisation in order to achieve a viable scheme for the regeneration of the Ladderswood Estate. Proactive release was also accepted to facilitate improvements to the remainder of the industrial estate as set out in Core Policy 45: (New Southgate) and Core	

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					<p>Policy 15: (Locally Significant Industrial Sites).</p> <p>The consented planning scheme for Ladderswood includes six B1(b) and (c) units. If implemented, the new units may be bought back into the LSIS designation as recommended by the 2012 Employment Land Study to strengthen and raise to profile of the LSIS.</p> <p>The NCAAP makes a commitment to creating and protecting jobs, releasing this remaining parcel of LSIS for mixed use housing led regeneration is not justified by existing Local Plan policies and evidence base.</p>	
56	Figures 13,14,15,16,17 &	N/S	Unsound	Amend to include the New	As set out in Enfield's	No change.

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	18 /10/002 10 –DHA Planning on behalf of New Ladderswood LLP			Southgate Industrial Estate as an opportunity site.	response to Rep No. 53 above, the NCAAP does not propose any change to the employment designation of this site.	
57	Policy 13 Ladderswood Estate/ 10/003 10 –DHA Planning on behalf of New Ladderswood LLP	N/S	Unsound	Amend to be consistent with the Council’s own resolution to grant planning permission. In particular, Part 4 should be amended to refer to a capacity for 517 dwellings (net increase of 356).	Aligning Policy 13 ‘Ladderswood’ to the approved planning application is not considered to be appropriate or justified. The Policy provides the framework and vision for this site. The consented planning scheme has yet to be implemented, and should a revised or new scheme come forward; Policy 13 would still remain the relevant starting position. Policy 13 is sufficiently flexible and appropriately states the considered capacity is “approximately 400	No change.

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					<i> dwellings.”</i>	
58	New Policy 13a/10/004 10 –DHA Planning on behalf of New Ladderswood LLP		Unsound	<p>Following the format of the identified development sites in Policy 12, a new policy should be inserted relating specifically to the New Southgate Industrial Estate site.</p> <p><i>New Policy 13a – NEW SOUTHGATE INDUSTRIAL ESTATE (SITE 1A)</i></p> <p><i>Redevelopment of the site will secure its long-term future and deliver a better integrated development with the Ladderswood Estate regeneration and a high quality sustainable new neighbourhood. Having regard to any approved development for the Ladderswood Estate, any development should take account</i></p>	The Council has provided a detailed response under Rep No 53. The release of the employment land to housing led development is not consistent with existing Local Plan policies and the Employment Land Study 2012.	No change.

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				<p><i>of the following:</i></p> <ol style="list-style-type: none"> <i>1. Be residential-led and deliver a sustainable mixed community when taken with the Ladderswood Estate;</i> <i>2. Include high quality B1 employment provision following the principles of the provision approved as part of any planning permission for the Ladderswood Estate;</i> <i>3. Secure safe access via the Ladderswood Estate development and enhance pedestrian connectivity and legibility throughout the area;</i> <i>4. Preserve and enhance the landscape and ecological value of Bounds Green</i> 		

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				<p>Brook;</p> <p>5. Provide a layout, form and design of development that taken with any approved development at the Ladderswod Estate, creates an appropriate gateway to the Bounds Green/Station Road junction.</p>		
59	<p>Fig. 18 Site Proposals / 18/002</p> <p>18 - Savills on behalf of Legal & General and National Grid</p>	No	Viability	<p>Figure 18 shows residential on ground floor on site 2 which directly fronts onto the North Circular. Figure 18 should be amended to show commercial uses at ground floor fronting the North Circular. It is important that provision is made for an adequate amount of commercial floorspace to ensure the scheme is financially viable and deliverable.</p>	<p>Figure 18 is not intended to be overly prescriptive. Residential development fronting directly on to the North Circular Road is not considered inappropriate. Addressing the North Circular positively as a frontage is a key objective of the Policy 6 High Quality Design of New Development.</p> <p>The amount of commercial floorspace set out Policy 14:</p>	No change.

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					(Western Gateway) allows for <u>approximately 3,500sqm</u> . This figure is considered to provide a degree of balance between the mix of land uses promoted for sites 2, 3 and 4.	
60	Policy 14 Western Gateway Site/18/003 18 - Savills on behalf of Legal & General/National Grid	No	Viability, not positively prepared and not effective.	Supportive of the mixed use redevelopment, however, landowners consider housing led mixed use development is not viable or deliverable. There are key issues that limit the options for providing a financially viable development, these are set out as - Contamination issues; - Homebase and Topps Tiles are relatively valuable and need to be displaced; - residential values are not significant in this area, particularly for this site given the juxtaposition between the busy road and railway	Support for a mixed use scheme is noted. The issues set out concerning viability would need to be evidenced at a more detailed planning proposal level. However, to date, the landowners have not put forward a detailed scheme that would validate the representation. The principle of a housing-led mixed-use scheme has been evidenced and adopted through the Enfield Core Strategy and the New Southgate Masterplan. Enfield Council questions the	PPMC 38

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				<p>line;</p> <p>The provision of leisure facilities as part of a mixed use development is particularly important because there is currently a shortage of quality leisure facilities in the south of the Borough. Consider the AAP as currently drafted is potentially unsound as it has not been positively prepared and is not effective.</p> <p>To ensure the AAP is sufficiently flexible, suggest part 3 of Policy 14 is amended to read “.....a taller building of approximately 10 storeys....”.</p> <p>Allow some flexibility in terms of the amount of houses that can be provided, we suggest that part 6 of the policy is reworded to state: <i>The</i></p>	<p>representor’s argument that residential values are not significant in this area. A number of residential schemes are being pursued along the A406 corridor that contradicts this statement.</p> <p>The wording of bullet point 3 of Policy 14 “a taller building of approximately of up to 10 storeys” continues to provide sufficient flexibility with a degree of guidance, without being unduly prescriptive.</p> <p>Additional flexibility is agreed at bullet points 2 and 6 of Policy 14 that now includes ‘leisure’ as part of the development mix and at point 6 offers a flexible housing</p>	

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				<p><i>site has the capacity to deliver up to 360 new dwellings of a mixed tenure and size.</i></p> <p>In summary, the inclusion of the site in the North Circular Area Action Plan is supported. However, the detailed comments provided above in particular those relating to providing an attractive and viable mix of uses should be taken into consideration. A viable mixed use development (including housing, retail, leisure, employment and community facilities) would contribute towards achieving the Council's regeneration objectives and an element of retail is essential.</p>	<p>target for the site and now gives a range <u>between 200 – 360</u> units.</p> <p>This approach has been taken to encourage enhancement of the existing local centres while recognising that housing growth may result in the need for some uses that directly support new homes in New Southgate.</p> <p>Enfield Council will continue to discuss the deliverability and viability of any proposed developments with the landowners.</p>	

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61	Policy 14 Western Gateway Site/23/003 23 - Environment Agency	N/S	N/S	Remediation of the gasholder site should be mentioned in the NCAAP. The Environment Agency (EA) would expect development in New Southgate to deculvert Bounds Green Brook and would require an undeveloped eight meter buffer zone.	The detailed aspects related to remediation works and detailed requirements of the EA of development are considered more appropriate to a detailed development scheme. The deculverting of Bounds Green Brook is one option that still requires more detailed investigation.	No change.
62	Policy 15 new Southgate Station (Site 5)/02/001 02 – Arriva Buses	N/S	N/S	Policy 15 sees development around New Southgate Station. Road side parking is already an issue on Station Road, from the North Circular Road through to Friern Barnet Road. Will measures be taken to improve this, or at least to stop it from becoming worse?	The aim of the Plan is to improve transport and movement along the length of the corridor, recognising that there are certain pinch points of congestion as pointed out in this representation and by Barnet Council in Rep No. 44.	No change.
63	Policy 17 Arnos Grove Station (Site 7)/12/002 12 – Transport for	No	Viability	Site 7 Arnos Grove Station site TfL Property supports 'in principle' the identification of the land adjacent to Arnos Grove Station as	Two of three sites covered by Policy 17: (Arnos Grove Station) are currently surface commuter parks and have	No change.

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	London (property)			<p>an Opportunity Site for mixed-use development including residential development referenced Policy 17: 'Arnos Grove Station,' Site 7 in the NCAAP.</p> <p>However, TfL Property reiterate concerns raised in February 2012 whereby the release of TfL land to the west of the station to accommodate a mixed use development scheme is dependent on the consolidation of car parking spaces on TfL land to the east. Welcome the recognition that the provision of commuter parking would be subject to detailed feasibility studies and balanced against the aims of the London Plan and the Mayor's Transport Plan. TfL would not support the assumption that a decked structure would be provided on eastern parcel of land to allow for the</p>	<p>been intentionally linked owing to their use, relationship to Arnos Grove Station, and partly due to ownership. The policy approach for the sites has moved on since the 'Towards Pre-Submission' consultation (Nov 2011-Feb 2012) to take account of the views expressed by TfL property. As drafted, Policy 17 point 1 uses the words '<u>on the assumption</u>' that parking capacity on the east would be expanded to compensate for loss". The use of these words replaced "dependent on" to offer an appropriate degree of flexibility given the uncertainty of how TfL intend to take forward theses sites.</p>	

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				<p>expansion/compensation of commuter car parking. The site is constrained by both its size and irregular shape, therefore any decked structure is largely dependent on satisfying engineering constraints and commercial viability matters, a point not currently reflected in Policy 17 and its supporting text.</p> <p>To ensure Policy 17 is 'effective', 'justified' and sound we would recommend amendments to Policy 17 and its supporting text to reflect engineering and commercial viability matters to facilitate the delivery of development on the sites.</p>	<p>The supporting paragraph goes on to state the reduction of public parking would in planning terms need to be justified but also recognises in the final sentence of the supporting text under Policy 17 that '...consolidating car parking may not be the appropriate solution in the context of TfL's wider strategy". Reference to the potential of a 'decked structure' on the eastern site has not been carried forward in the Proposed Submission NCAAP having taken on board TfL's previous comments in 2012.</p>	
64	Policy 19/23/004 23 – Environment Agency	N/S	N/S	Environment Agency support element 4 but do not feel the New River should be given greater priority over Pymmes Brook.	Agree both corridors are equally important, amendment made via PPMC.	PPMC 46

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65	Fig 21/23/05 23 – Environment Agency	N/S	N/S	An 'improvement opportunity' is identified at (D), but not explained in accompanying text.	On page 69 of the NCAAP under the heading 'Public realm and open space (Fig 21)' text explains that the opportunity identified at (D) is to improve the local environment and public access.	No change.
66	Policy 21 Telford Road /Bowes Road Corner (Site 10) 06/009 06 – Individual/Resident	N/S	N/S	The PTAL score falls within the 4-6 range. The site covers 0.35 hectares, which indicates a maximum of 79 units compared with a planned build of 62. However, in terms of population estimates indicate an increase from 63 residents to 180, an increase of 185%. Not only will Southgate Green ward see the increases indicated on sites 11, 13, and 10, but increases will also result from other developments described in the NCAAP. Taken together it is estimated that the population in the ward will rise by about 3,000	Making the most efficient and best use of Enfield's limited land is promoted in locations well served by public transport as set out in Enfield's Core Strategy and the Mayor's London Plan Policy. The North Circular Area Action Plan applies the density ranges as set out in the London Plan. Fig 8 (page 28 -29) provides a capacity schedule for Opportunity Sites based on the density matrix provided by the adopted London Plan	No change.

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				people, which is close on 25%.	(2011). It is unclear how the representor has calculated population density growth for Southgate Green ward. Enfield's adopted Core Strategy established a potential housing growth target of 1500 new homes in the area by 2026 and recognised this would lead to a population growth of the NCAAP area of some 3,750. Using an average of 2.5 persons per new home.	
67	Policy 21 Telford Road /Bowes Road Corner (Site 10) 16/003	N/S	N/S	Site 10 Telford Road / Bowes Road Page 71, Policy 21 Telford Road / Bowes Road Corner Sites. Point 2 refers to high quality development of up to 5 storeys. However, planning permission has been resolved to be granted to a	The request to align Policy 21 to the approved planning application is not considered to be appropriate or justified. The Policy provides the framework for this site. The consented scheme has yet to	No change.

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				maximum height of 6 storeys so this policy should be amended to reflect the current position.	be implemented, therefore should a revised or another scheme come forward Policy 21 would still remain the starting policy position.	
68	Policy 21, 22 and 24/12/003 12 – Transport for London	N/S	N/S	TfL Property welcomes the promotion of Sites 10, 11 and 13 (Policies 21, 22, and 24) for housing-led development. In particular, it welcomes Policies 21 and 22, agreeing that this is a key junction and point of transition along the North Circular Road and that new development would help define and enclose this junction, although we note a typographical error associated with Policy 21, point 3 (page 71).	Comments noted.	No change.
69	Policy 22 Bowes Road Wilmer Way (Site 11) /06/008 06 Individual/Resident	N/S	N/S	In the case of site 11 the PTAL rating is given as 4 in the NCAAP and as 5 by TfL. The planned number of units on planning application P12-3179PLA is for 56 units. However, in	Making the most efficient and best use of Enfield’s limited land is promoted in locations well served by public transport as set out in Enfield’s Core	No change.

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				<p>terms of population, it is estimated that around 140 people lived in houses on Bowes Road. With the new development this increases to around 278, an increase of 99%.</p> <p>Southgate Green ward will see significant population increases result from proposed developments described in the NCAAP. Taken together it is estimated that the population in the ward will rise by about 3,000 people, which is close on 25%.</p>	<p>Strategy and the Mayor's London Plan Policy. The North Circular Area Action Plan applies the density ranges as set out in the London Plan. Fig 8 (page 28 -29) provides a capacity schedule for Opportunity Sites based on the density matrix provided by the adopted London Plan (2011).</p> <p>It is unclear how the representor has calculated population density growth for Southgate Green ward. Enfield's adopted Core Strategy established a potential housing growth target of 1500 new homes in the area by 2026 and recognised this would lead to a population growth of the</p>	

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					NCAAP area of some 3,750. Using an average of 2.5 persons per new home.	
70	Policy 23 Ritz Parade/16/003 16 - Notting Hill Housing Trust	N/S	N/S	It is useful to see the Council's emerging vision for Ritz Parade. The key to unlocking its potential is engagement and partnership with the Council and therefore it is considered that it is too early for detailed comments to be made on capacity, form and content of any future development until the issues of land ownership and hence delivery are fully understood. Notting Hill therefore reserves their position in terms of this development opportunity, albeit recognising that the uses set out seem appropriate. Notting Hill however support the comprehensive development of Ritz Parade, including the central	Support noted. The Plan continues to provide a level of flexibility and scope as to how the regeneration of Ritz Parade can be facilitated. The Plan applies the density ranges as set out in the London Plan. Fig 8 (page 28 - 29) provides a capacity schedule for Opportunity Sites based on the density matrix provided by the adopted London Plan (2011). It is appropriate for the Plan to guide investment and provide a level of expectation without being too prescriptive.	No change.

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				<p>parade, rather than piecemeal development to either side, which is unlikely to be deliverable on its own. Given that the operation of the central section has been severely undermined and constrained by the works to the road a preference towards its retention is not appropriate and is likely to impede the provision of a viable and vital neighbourhood centre in this location. The AAP should be used to support and encourage comprehensive development and include the central parade within the opportunity site, in accordance with the adopted Core Strategy.</p> <p>The suggested densities and unit numbers highlighted on pages 28/29 and within Policy 23 are too restrictive and are likely to impede</p>	<p>A capacity assumption for all 20 Opportunity Sites within NCAAP has been documented in Fig 8 (Pages 28/29) and all opportunity site policies state an approximate capacity, including where appropriate, building heights.</p> <p>Policy 23 provides a framework for retaining the central section building and developing on the land either side of it. The capacity range of 20 net additional new homes is based on this option.</p> <p>The final paragraph of Policy 23 does however make reference to the fact that should a comprehensive development scheme come forward then the appropriate</p>	

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				any redevelopment and improvement to the neighbourhood centre overall. Such detail should be left for a subsequent planning/development brief which can appropriately assess the sites context and development proposals.	way in which to deal with this will be through a planning / development brief.	
71	Policy 23 Ritz Parade/11/001 11 – Ritz Parade Traders Association			Welcome the plan’s strengthening of the Ritz Parade. Agree that as a result of past decisions, the viability of the parade has been reduced significantly, principally as a result of the lack of parking. The traders acknowledge the development opportunity identified to the west side, on the proviso that any flats above are built in keeping with the area and reasonable parking for the shopping function. The plan quite rightly identifies the	Comments of support for the policy approach are noted. Policy 23 responds to previous consultation by providing a framework that retains the central building and developing on the land either side of it. Previous stages of the NCAAP’s preparation received a mix response from the local community, some residents supported the building’s retention as they considered it to be a local landmark and others were less	No change.

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				<p>need to create a landmark point along the parade. Currently, the Jehovah’s hall goes some way towards this function; however, there is a need for a commercial landmark also. Prior to the recent TFL road scheme, this function was served by the old Barclays building on the corner of Powys Lane, now demolished.</p> <p>The Association would like to see much less emphasis on the option of a “comprehensive” redevelopment of the entire parade and greater emphasis on the mixed use development opportunities identified either side of the central section of the parade. The reason we say this is because any comprehensive redevelopment would require a number of parties working for a long time in</p>	<p>concerned about retaining it.</p> <p>Extending the boundary of Bowes Large Local Centre (page 46-47) to now also include the vacant Esso garage land to the west and land immediately to the east of the central building creates more space and greater opportunity for developing either site of the central part of Ritz Parade to increase commercial viability and allow for significant enhancements to the Parade.</p> <p>Policy 23 and the supporting text does also recognise that comprehensive development may also be a viable option, particularly if additional community facilities and</p>	

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				<p>collaboration, with the added complexity of CPOs. The different pockets of land ownership will make this process difficult and very lengthy. This area has already been blighted by over 30 years of uncertainty.</p> <p>The area requires a commitment to enhance and improve the area now with a view to achieving certainty and settlement as soon as possible. It should do this by seeking to strike a balance between sympathetic development by enhancing the existing positive elements of the site. The primary focus should be the retention of all of the commercial elements of the Parade, helping them to survive as viable commercial units and a growing hub for a growing community.</p>	<p>services are sought to be secured through achieving higher density than currently exists. Comprehensive development may not necessarily be as longer term as suggested in the representation, the aspirations to deliver the site have been acknowledged by the key landowner, Notting Hill Housing Trust.</p>	

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72	Policy 24 Bowes Road Sites (Site 13 Powys Lane to Broomfield Road)/06/010 06 – Individual/Resident	N/S	N/S	In the case of Site 10 the PTAL score falls within the 4-6 range. The site covers 0.35 hectares, which indicates a maximum of 79 units compared with a planned build of 62. However, in terms of population estimates indicate an increase from 63 residents to 180, an increase of 185% . Not only will Southgate Green ward see the increases indicated on sites 11, 13, and 10, but increases will also result from other developments described in the NCAAP. Taken together it is estimated that the population in the ward will rise by about 3,000 people, which is close on 25%.	Making the most efficient and best use of Enfield’s limited land is promoted in locations well served by public transport as set out in Enfield’s Core Strategy and the Mayor’s London Plan Policy. The North Circular Area Action Plan applies the density ranges as set out in the London Plan. Fig 8 (page 28 -29) provides a capacity schedule for Opportunity Sites based on the density matrix provided by the adopted London Plan (2011). It is unclear how the representor has calculated population density growth for Southgate Green ward. Enfield’s adopted Core Strategy established a	No change.

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					potential housing growth target of 1500 new homes in the area by 2026 and recognised this would lead to a population growth of the NCAAP area of some 3,750. Using an average of 2.5 persons per new home.	
73	Policy 24 Bowes Road Sites (Site 13 Powys Lane to Broomfield Road)/17/001 17 - Hammond of Hendon Ltd	N/S		Specifically concerned about the site East of Powys Lane, noted in Proposed Submission draft as “a large site presents major opportunity for new residential development. However, concerned the current planning application for Site 13 represents overdevelopment.	The site the respondent is making reference to is Site 13: Powys Lane to Broomfield Road, subject to a current undetermined planning application. Policy 24 provides the policy framework to guide both the applicant and the Development Management Case officer, who would assess the planning applications for this site.	No change
74	Policy 25 Green Lanes	N/S	N/S	Bullet point 4: Do not feel the New	Bullet point 4 specifically	No change.

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	Neighbourhood Place/23/006 23 – Environment Agency			River should be given priority over Pymmes Brook as suggested.	refers to the particularly opportunities within the Green Lanes Neighbourhood Area. Here, improvements have been prioritised relative to development opportunities. In particular Site 14: Southgate Town Hall.	
75	Policy 27 Green Lane Site 15 23/007 23 – Environment Agency	Y	Y	Given parts of the site fall within flood zone 2/3 the Policy should indicate that new development should be steered to area of lowest flood risk on the site.	Agreed, amendment made via PPMC	PPMC 59
76	Policy 28 Green lanes/A406 Junction North (Sites 16 and 17)/02/002 02 – Arriva Buses	N/S	N/S	This includes the Regents Avenue Industrial Estate, where Arriva Bus garage is situated. The policy intends to maintain employment use for the short to medium term. The bus garage is fully used, and intends to continue to operate there for the long term.	The concerns raised over the long term future of the estate have been clarified via PPMC 14 with additional wording proposed to give greater certainty over the Council's intention to continue the long term designation of this employment area.	PPMC 14
77	Policy 28 Green	N/S	N/S	Notting Hill have an interest in both	It is appropriate for the Acton	No change.

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	lanes/A406 Junction North (Sites 16 & 18)/16/004 16 Notting Hill Housing Trust			these sites but similar to Ritz Parade, realising the potential for the sites will be dependent on reconciling issues of delivery and working in partnership the Council. Comments made to earlier versions of the AAP have always considered the entire southwest quadrant (the land fronting the A406 and Green Lanes, as well as, Site 18) to offer the potential for redevelopment to deliver significant improvements in terms of commercial, community and possible health offer with the delivery of residential properties. Notting Hill would support a more comprehensive approach to this part of the junction. To achieve this aspirational improvement an increase in density and height would be required at this junction and development would certainly need to be over the 3 storeys set	Plan to provide clear design principles for each of NCAAP's Opportunity Sites and guide investment without being overly prescriptive. Through its evolution, the Plan has considered the development approach of the sites at the Green Lanes quadrant. This is a key junction that needs to be addressed within the context of its potential as well as existing surroundings. The view that the sites to the north (sites 16 and 17) offer the greatest opportunities for major development is maintained. Green Lanes to the north of the North Circular Road and continuing northwards towards Palmers Green	

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				<p>out in the NCAAP; one that is a landmark for the area.</p> <p>Notwithstanding the above, for development to be realised and delivered on Site 18 only, as identified in the draft AAP, an increase in height above three storeys will be required. Detailed assessment of the site context, surroundings, the proposals and their viability is required to understand the appropriate development potential of these sites. As such the document should not be as prescriptive in relation to density and building heights.</p> <p>As with Ritz Parade, Notting Hill reserve their position in terms of these Green Lanes sites as further detailed capacity and design work is carried out, in addition to</p>	<p>District Centre offers a much weaker presence in terms of townscape and Local Centre function than Green Lanes south of the North Circular Road. The Clock House Parade on the south east corner and the Parade on the south west corner offer local visual townscape merit considered worthy of retention, and this is reflected in the NCAAP approach to Site 18.</p> <p>Further consideration of appropriate height for Site 18 will be subject to a detailed planning application and assessment against NCAAP Policies as well as detailed criteria based policies in the Proposed Submission Development Management</p>	

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				reconciling various existing land interests that will need to be resolved prior to committing to a defined vision.	Document, adopted London Plan and NPPF.	
Section 5 Infrastructure Priorities and Delivery Mechanisms						
78	Section 5.3 Key Infrastructure /20/001 20 – Thames Water	N/S	N/S	It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed AAP proposals. From the information available to date we do not envisage infrastructure concerns regarding Waste Water or Water Supply capability. However, there may be the need for localised upgrades and specific requirements for certain development sectors to be connected to the existing system at specific locations. It should be noted that in the event of an upgrade to our assets being	The adopted Core Strategy already has a policy (Core Policy 21) to ensure water supply, sewerage and drainage infrastructure is in place in tandem with development.	No change

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				<p>required, up to three years lead in time will be necessary.</p> <p>Given the above water supply and drainage infrastructure comments, TW consider that a comprehensive Water Supply and Drainage Strategy for the North Circular AAP proposals should be prepared by the Developer/Council in consultation with Thames Water and the Environment Agency.</p>		