

Submission Stage

North Circular Area Action Plan

**REGULATION 22
CONSULTATION STATEMENT**

August 2013

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1 Process of Engagement

- 1.1 The North Circular area is one of the identified Regeneration Areas confirmed through Enfield's adopted Core Strategy in core policies 44 and 45. The North Circular Area Action Plan (NCAAP) will provide the planning framework to guide and direct improvements and regeneration along the North Circular Road Corridor between Green Lanes on the east, along to the New Southgate area in the west. It sets out a vision for what we want the area to be like in the future as well the plans and projects needed to deliver that vision on the ground and make it a reality for residents who want to see real change in their neighbourhoods.
- 1.2 In order to satisfy the requirements of Regulation 22 (1) (c) (of the Town and Country Planning (Local Development) (England) Regulations 2012) and the Council's Statement of Community Involvement (2006) this statement incorporates and expands on the Consultation Statement prepared at Proposed Submission stage, published in April 2013.
- 1.3 This Regulation 22 Consultation Statement provides a summary of the consultation stages undertaken in preparing the Plan. It highlights the meetings, workshops, discussions and periods of consultation that have helped in the preparation of the Area Action Plan to the point of Submission.

2 Background to Plan Preparation

- 2.1 The process of preparing the NCAAP started in 2007, two formal stages, (Issues & Options and Preferred Options) were carried out under the regulations of the Town and Country Planning (Local Development) (England) Regulations 2004. The 2004 regulations were subsequently superseded in 2009. The preparation of the NCAAP was then paused in 2008/09 to allow the Council to progress the adoption of Enfield's Core Strategy.
- 2.2 Enfield's Core Strategy was adopted in 2010 and with significant progress on a number of other local initiatives being progressed along this section of the North Circular corridor; work on the Action Plan recommenced in 2011. The Council reinstated an officer level steering group to guide the project at key stages. The steering group involved officers from a range of relevant cross-departmental services.

LBE Officer Steering Group

Key Roles: production, guidance, ownership, resources.

CHAIR - Team Leader Planning Policy

MEMBERSHIP – Planning Policy Lead Officers
Planning Decisions Manager
Planning and Regeneration Officer
Operations Manager Transportation
Housing Enabling Officer
Education
Property
Sustainable Communities
Consultant lead – Allies Morrison Urban Practitioners

- 2.3 Under the 2009 Town and Country Planning (Local Development) (England) Regulations a further 'Towards Pre-submission Stage' round of consultation was undertaken, (Stage 3). Under the current Town and Country Planning (Local Development) (England) Regulations 2012, this stage of consultation was undertaken in accordance with and represents Regulation 18.
- 2.4 The comments and representations received during this stage of consultation, together with those that had preceded it, informed the preparation of the Proposed Submission Draft North Circular Road Area Action Plan (February 2013).
- 2.5 Following a review of the consultation responses received over all 3 stages of plan preparation, a Proposed Submission NCAAP was prepared; further details on this are provided in section 4 of this document.

Bodies and persons invited to make representations

- 2.6 A range of the bodies, organisations, groups and individuals were invited to make their comments throughout the preparation and publication stages of the North Circular Area Action Plan. All consultation bodies are registered on the Council's Local Plan database. General consultees include a range of organisations and individuals or 'other' consultees. Email notifications of formal consultation stages were sent out, and where requested, hard-copy notification letters were also sent. Approximately 1500 individuals and organisations were notified, including specific, general and other consultees, internal Council officers and Councillors.

3 Regulation 18: Towards A Pre-Submission Draft North Circular Area Action Plan consultation (Nov 2011).

- 3.1 In November 2011 Enfield Council published for consultation a “Towards Pre- Submission Draft NCAAP for public consultation. An extensive 12 week consultation took place between November 2011 and February 2012.
- 3.2 This stage of consultation was viewed as an opportunity to re-engage the community and stakeholders since the Plan had paused in 2008/9. The Draft Towards Pre-Submission document was used to re-establish and confirm the most up-to-date and relevant planning issues facing the area. This was extremely valuable and provided the Council with a number of very helpful suggestions that would then shape and improve the Plan before it was drafted to be submitted to the Secretary of State.
- 3.3 The Towards Pre-Submission document was made available online, and paper copies were available at all Council’s libraries and at the Civic Centre. The document was published on the Council’s website (www.enfield.gov.uk/ncaap) as a pdf document.
- 3.4 A leaflet-drop to approximately 18,800 property addresses within the three borough wards of Bowes, Southgate Green and Palmers Green within the NCAAP boundary was undertaken. This campaign advised the local community of the document and the upcoming community consultation event, (see paragraph 3.7).
- 3.5 A roaming banner exhibition was circulated between the two main local libraries, Bowes Library and at Palmers Green Library. Copies of the Towards Pre-Submission Plan were on display with consultation boards identifying the key issues and proposals for the area. Consultation response forms and questionnaires were also made available.
- 3.6 Emails and letters were sent out to approximately 1500 specific, general and other consultees informing them of the scope of the document, a link to a copy of the document online and the deadline by which comments had to be received. Consultees were also informed of ways of submitting comments which included using the Council’s online consultation questionnaire.
- 3.7 On the 4th February 2012, the South West Enfield Partnership (SWEP) hosted a Community Lunch locally at Trinity at Bowes Methodist Church. This event provided the widest coverage and exposure of the re-launch of the NCAAP plan making process. The event proved successful and was attended by over 200 members of the community. Additional supporting consultation and workshop events were held at the following locations:

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|-----------|---|
| 22.11.11: | SWEP Presentation 4pm -6pm. |
| 07.12.11: | Bowes, Palmers Green and Southgate Green Area Forum. |
| 10.12.11: | Ladderswood Public Consultation Garfield School 11am - 4pm. |
| 04.01.12: | Broomfield Residents Association walkabout. |
| 11.01.12: | New Southgate Neighbourhood Panel Meeting 6pm -8pm. |
| 21.01.12: | Meeting at St Pauls New Southgate 1pm – 3pm . |
| 01.02.12: | Ritz Parade Traders Association meeting. |

- 12.02.12: Over 50s Forum Presentation.
28.03.12: Neighbourhood Planning Workshop 6pm-8pm.

3.8 Towards Pre-Submission - Main Issues

3.9 In total, the Council received some 70 responses via direct emails, questionnaire responses and letters. A summary of responses has been set out in a schedule (Appendix 1). A summary of the main issues are highlighted below:

- There was a general feeling of concern over the proposed housing growth strategy and a housing target of 1300-1500 new homes that would have to be accommodated in an area already congested by traffic and constrained by the capacity of the North Circular Road (NCR).
- There was general consensus with the document that the area's image of being run down, dominated by the A406, congested by traffic, polluted, and in need of long over due investment and regeneration.
- The capacity of existing and the ability to provide new community infrastructure, such as school places and health provision, was heavily questioned.
- The local community expressed strong sensitivities around some of the early redevelopments proposals along the NCR corridor particularly around density, backland development, parking, impact on traffic, and height of future development proposals.
- Some respondents, principally residents north of Broomfield School, felt their neighbourhood did not identify with any of the 3 Neighbourhood Places proposed in the Towards Pre-Submission Draft.
- Residents and businesses felt a pressing need for the creation of a greener and more pleasant environment along the NCR to try and counter the traffic, noise and air pollution.
- The current condition of historical local assets such as Truro House and Broomfield House were highlighted as a local concern amongst residents.
- Strong opposition against proposals for a new waste management facility at Pinkham Way. The proposal would only serve to bring additional traffic and pollution to the area and would contradict NCAAP. The omission of any reference to the Pinkham Way proposal within the Towards Pre-Submission draft was heavily criticised, respondents felt the NCAAP should be addressing the draft waste facility proposals.
- The completed highway and safety improvement works undertaken by Transport for London (TfL) drew criticism from residents and businesses, with businesses, especially those within Ritz Parade, stating that the loss of parking spaces and new restrictions have negatively impacted on their commercial activity.

Main Issue 1: Area Action Plan Boundary

- 3.10 With respect to the proposed delineated boundary of the NCAAP and the 3 'Neighbourhood Places' identified within the consultation document. Comments on the Towards Pre-Submission Draft raised specific comments and questions around the 3 'Neighbourhood Places' and generally the justification for the Area Action Plan's boundary, particularly sought justification as to why the residential area just south of Broomfield Park had been included within the Plan boundary.

Proposed Submission Response:

The Proposed Submission NCAAP has responded by amending the AAP boundary to reflect more logically the area of change and regeneration opportunities.

A workshop specifically designed to explore the boundary took place at Trinity at Bowes Methodist Church on the 28th March 6pm – 8pm. No regeneration opportunities are identified within the area just south of Broomfield Park therefore it was agreed that there was little justification to include the residential neighbourhoods. The workshop explored a more logical boundary, and consensus arrived at the physical marker of Pymmes Brook.

Main Issue 2: Transport

- 3.11 With regard to transport matters, representations raised the following:

- Existing and the potential for future congestion on roads in and around the NCAAP area and associated rat-running along residential streets.
- The need to improve connectivity between neighbourhoods and provide a solution to overcome the severance caused by the A406, particularly north-south movements and vice versa.
- The on-going snagging issues as a consequence of the recently implemented TfL Environmental and Safety Scheme.

Proposed Submission Response:

The Proposed Submission NCAAP policies encourage a shift towards more sustainable forms of transport but Policy 8 has been drafted to recognise a need to continue work with TfL to bring forward additional capacity and road improvements.

The historical capacity scheme that blighted the area has been superseded by events and the longstanding local safeguarding of land and properties illustrated on the Core Strategy Policies Map 2010 have now been sold by TfL to Notting Hill Housing Trust. Therefore the NCAAP Policies Map deletes the Core Strategy safeguarding in recognition the regeneration that is now taking priority.

Main Issue 3: Housing Growth and Supporting Community infrastructure

- 3.12 Representations raised concerns over the proposed level of new housing the Towards Pre-Submission Draft proposed for the area. The community questioned how this could be accommodated in an area with population densities already over the borough average and raised concerns about the existing under provision of social and community infrastructure.

Proposed Submission Response:

The Proposed Submission NCAAP has undertaken further capacity work that has resulted in a revised housing target. The Towards Pre-Submission Draft target of 1,500 is now approximately 1,300 new units in the Proposed Submission document, reflected in NCAAP Policy 2: New and Refurbished Homes.

Section 3.3: Community Infrastructure articulates the Plan's approach to securing sufficient infrastructure. NCAAP Policies 4 and 5 directly address local education and health provision opportunities.

Main Issue 4: Proposed Waste Facility (Pinkham Way) in the neighbouring borough of Haringey

- 3.13 Respondents were concerned that the document did not acknowledge the proposed development and many considered the proposal would undermine the regeneration objectives of the North Circular Area Action Plan.

Proposed Submission Response:

The Proposed Submission NCAAP now makes reference to the potential proposals and clearly states that the site is located within the administrative boundary of Haringey Borough. Additional Post Publication Minor Changes are proposed to reflect the most current status of proposals.

Main Issue: 5: Density, back land development, and building heights of new development

- 3.14 Respondents raised concern over development proposals that would lead to the inappropriate densities, the loss of rear gardens and overdevelopment, including the inappropriate location of tall buildings.

Proposed Submission Response:

Policy 7: 'Building Heights and Development Densities' has specifically addressed these concerns by clarifying the approach to assessing taller buildings and where they may be appropriate within the North Circular context. The supporting text to this policy also recognises the Council's position is a presumption against backland development; however a local exception to this is identified at the southern boundary of Broomfield Secondary School and Bowes Road.

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

- 4.1 The following section sets out a summary of the main issues raised during Proposed Submission consultation and the Council's responses to them.
- 4.2 The Proposed Submission Draft was formally published for a 7 week public consultation period between the 10th April and 29th May 2013. The Plan and all of its supporting documentation were made available by visiting the Council's website at: www.enfield.gov.uk/NCAAP or hard-copies of the Plan were made available to view in all of Enfield's Libraries and the Civic Centre. Supporting documents included:
- NCAAP Policies Map
 - Sustainability Appraisal
 - Consultation Statement
 - Equality Impact Assessment
- 4.3 A Community Lunch event (hosted again by the SWEP) launched the formal public consultation process and the Plan's publication. This was held on the 9th March 2013 in the local area at Trinity at Bowes Methodist Church. This had been arranged with the South West Area Partnership on the back of the successfully attended event held during the Towards Pre-Submission consultation in 2012.
- 4.4 Further supporting meetings and events were attended by officers to promote the NCAAPs publication, details of these events will be made available on the Council's website: www.enfield.gov.uk/NCAAP.

9 th March	11am – 3pm SWEP Community Lunch – Trinity at Bowes
13 th March	8.00pm Southgate Green Residents meeting - Trinity at Bowes
19 th March	9.30am Ritz Parade Business Association – Ritz Parade café
21 st March	4pm -6pm SWEP Meeting – Southgate College
16 th April	7.30pm Southgate green, Bowes and Palmers Green Area Forum.
22 nd May	SWEP Feedback Session.

- 4.5 In total 78 representations were received from the following 24 representors:
1. English Heritage.
 2. Arriva Buses.
 3. Highways Agency.
 4. Network Rail.

5. Southgate District Civic Trust (SDCT).
6. Resident / Individual.
7. Federation of Enfield Residents and Allied Associations (FERAA).
8. The Canal & Rivers Trust.
9. Marine Management Organisation.
10. DHA Planning for Ladderswood LLP.
11. Ritz Parade Traders.
12. Transport for London (TfL) (Property).
13. Natural England.
14. Resident / Individual.
15. North London Waste Authority (NLWA).
16. CGMS on behalf of Notting Hill Housing.
17. Hammond of Hendon Ltd.
18. Savills on behalf of Legal & General/National Grid.
19. Broomfield Home Owners Residents Association (BHORA).
20. Savills on behalf of Thames Water.
21. Barnet Council.
22. Greater London Authority (GLA).
23. Environment Agency.
24. London Assembly Labour Member Joanne McCarthy.

4.6 Proposed Submission Consultation – Soundness and Main Issues

Heritage and Design Issues

- Heritage Assets should be given greater attention in the NCAAP. - (English Heritage and Southgate District Civic Trust (SDCT)).
- The Plan should not be as prescriptive in relation to density and building heights. - (Notting Hill Housing Trust).
- The document fails to detail what is meant by ‘high quality development’. (Broomfield Home-owners Resident Association (BHORA)).

Housing Growth

- Concerns over a housing led-regeneration strategy and the level of planned growth for the area and resulting population densities. - (Individual residents, Broomfield Home-owners Resident Association (BHORA), London Assembly Labour Member Joanne McCarty).
- Concerns over housing densities and building heights. - (Individual residents, Broomfield Home-owners Resident Association (BHORA), London Assembly Labour Member Joanne McCarthy)).

Employment

- The Plan is failing to protect local jobs in the area there is little detail in the Plan as to how this will be achieved. - (Broomfield Home-owners Resident Association (BHORA), London Assembly Labour Member Joanne McCarthy)).
- Confirm the long term protection of Regents Avenue Industrial Estate. – (Arriva Bus Depot).

Education

- Concern 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. - (Barnet Council, Individual residents, Broomfield Home-owners Resident Association (BHORA), London Assembly Labour Member Joanne McCarty)).

Transport

- The application of parking standards and PTAL ratings is questioned, but this relates more to the planning applications of individual opportunity sites. - (Individual residents, Broomfield Home-owners Resident Association (BHORA)).
- Concern over the removal of the historical safeguarding allocation of land along the A406 North Circular Road between Bounds Green Road and Green Lanes and future capacity improvements. - (Barnet Council and Federation of Enfield Residents and Allied Associations (FERAA)).
- Issues of safety need to be included in the NCAAP. (Individual residents, Broomfield Home-owners Resident Association (BHORA)).

Social and Community Infrastructure (education, health and community facilities) and Green Infrastructure

- The impact of housing and population growth and the adequate provision for community infrastructure, such as school places and health provision continue. The area is in great need of improved shopping facilities, employment, modern health and leisure facilities. - (Individual residents, Broomfield Home-owners Resident Association (BHORA), London Assembly Labour Member Joanne McCarty).
- Lack of proposals to improve creating a greener environment along the A406 corridor. (Individual residents, Broomfield Home-owners Resident Association (BHORA), London Assembly Labour Member Joanne McCarty).

Opportunity Sites

- Concern that some opportunity sites (9, 10, 11 and 13) have already been, or are in the process of being determined ahead of an adopted North Circular Area Action Plan. - (Individual residents and Broomfield Homeowners Resident Association (BHORA)).
- The Description of Opportunity for sites 2, 3 and 4 in Figure 6 should be reworded to read, "Mixed use high density development including leisure and retail, housing, and community facilities" (Savills on behalf of Legal & General and National Grid).
- Policy 12: 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 for residential-led mixed-use development and to specifically include an element of B1 employment development. (DHA on behalf of Ladders LLP).

- Policy 14 Western Gateway: The landowners consider housing led mixed use development is not viable or deliverable. - (Savills on behalf of Legal & General and National Grid).
- Policy 23 Ritz Parade: Support the comprehensive development of Ritz Parade, including the central parade, rather than piecemeal development to either side, which is unlikely to be deliverable on its own. (Notting Hill Housing Trust).
- Policy 23 Ritz Parade: Support the approach but would rather 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. This would seem more realistic and deliverable given the complexities around lease arrangements, rights of way and land ownerships.

APPENDIX 1

Summary of Regulation 18 Consultation Responses

North Circular Area Action Plan - Towards Pre-Submission Draft (Nov 2011 - Feb 2012).

Regulation 18.

Summary of issues / comments raised during the Towards Pre-Submission Draft Consultation (Nov 2011 - Feb 2012).

	Type of Response	Respondent	Summary of Issues	LBE Response
1	Email	Resident	Interesting + positive but could be blighted by Pinkham Way proposals.	Comments noted
2	Email / letter	Broomfield Residents Assoc	The Assoc does not agree nor identify with the Bowes Road Neighbourhood Place and identifies more towards Palmers Green as the focus for a our community. Concerns re increased housing densities. Report doesn't consider impact of waste plant. Already a chronic shortage of primary school places in P Green. Nothing to improve already poor community facilities	Boundary amended. A realigned northern boundary has now moved southwards to align with Pymmes Brook which represents a clear physical boundary. This was agreed via a Neighbourhood Places workshop held on the 27 th March 2012 following the Towards pre-submission consultation, where issues over the AAP boundary were raised. The NCAAP provides for housing – led regeneration and in doing so seeks to make efficient use of land in order to meet the adopted Core Strategy housing targets.
3	Email	Resident	Supportive of TFL works. But I must tell you that I have seen to date 30 vehicle's going out the wrong way onto the A406 to turn left, one day there is going to be a really nasty accident.	Comments noted. NCAAP is a strategic planning document and has little influence over the implementation of the TfL improvements scheme and the associated snagging issues. These are being resolved via

				the Council’s Traffic and Transport department and TfL directly. To be raised with TfL outside of NCAAP remit and via the South West Enfield Partnership (SWEP).
4	Email/ Letter	GLA	Production of NCAAP is welcomed. General objectives in 3.2 are at this stage in line with London Plan policies. In relation to open space, noting deficiency in the area, new development would be expected to take into account the Mayor's SPG guidance 'providing for play and young people's plan and informal recreation'. Also refer to new draft SPG out to consultation. Section 3.5 - the proposed approach to backland development is consistent with policy 3.5 of the London Plan. The GLA look forward to the next stage of the AAP where it sets out approach and locations for where tall & large buildings might be appropriate, sensitive or inappropriate. Enfield Council is currently engaging with Transport for London to confirm the short- and mid-term strategy for improvements along the North Circular, including the likely infrastructure requirements. The agreed position will be reflected in the next draft of the AAP.”	Reference to the Mayor's SPG and draft PG are noted. The NCAAP aims to deliver a framework for the appropriate location of taller buildings. NCAAP now provides a clear steer on what is considered 'tall' and where Policy 7: Building heights and development densities. Site specific policies provide detailed guidance on appropriate building heights and densities
5	Email	Resident	Objection to closure of Melville Gardens (accompanied by letter to TfL)	Objection noted, however, NCAAP as a strategic planning document has little influence over the implementation of the TfL improvements scheme and the associated snagging issues. These are being resolved via the Council’s Highways department and TfL directly.

6	Email	Resident	It is useful to consider why is it that the stretch of green lanes between Turnpike Lane Station and Manor Park tube station is so vibrant and why the green lanes strip near to the A406 is so dead? Review the range of shops/improve shop fronts. Review street lighting.	Comments noted. Opportunity sites are identified within The Green Lanes Neighbourhood Place promotes a mix of uses to bring added vitality to the area. NCAAP has proposed further consolidation of Bowes Local Centre to create more vibrancy. Opportunity sites within Green Lanes are identified.
7	Email	Resident	The improvement / regeneration concept has to be welcomed. Already visible changes to eg A406 and the Green Lanes /A406 junction give a feeling of a better place. Green space is frequently highlighted as being in deficit; and in the immediate localities this is the case. Trees are therefore crucial and should be scattered liberally. The New River forms a valuable green route across much of the area. It should be leveraged to the maximum. Congestion will therefore remain as an issue. Pinkham Way / Woods with its plans for a waste disposal site with large numbers of associated new journeys sits just outside the red line but is undoubtedly a factor for the NCAAP.	NCAAP seeks to implement a Landscape strategy and approach towards a greener environment. Opportunities for new spaces are limited and NCAAP recognises there will be a need for contributions towards the provision and or improvement of open spaces, existing open spaces in the area from new developments in the local area. NCAAP proposes to maximise the existing assets of the New River as well as Pymmes Brook. Policy 10 – seeks to secure appropriate contributions towards open spaces, waterways and the Blue ribbon network.
8	Letter	Theatres Trust	No further comment to that of response from 2008 as no new performance spaces are proposed.	Comments noted
9	Email	Resident	Idea to regenerate area is welcome more ‘hard’ information required. The central driver of the AAP (“the need for housing in the Borough”) is not itself open for consultation at all. No comparisons with new housing plans for other areas in Enfield are provided so that NCR residents can	The adopted Core Strategy establishes the policy approach on housing growth and this was subject to public examination in 2010. The Core Strategy is the planning document that

			see whether an already densely-populated district is being treated fairly by the planners. Any revised version of the document needs to include much more factual information and clear definitions of the terms employed – population data, traffic volumes, % of local and of through-traffic, air and noise pollution counts, area of open green space, definition of “tall buildings” and their relative costs and so on, with appropriate comparisons with other wards in the Borough.	sets the borough-wide context. The NCAAP 'publication stage' version will provide much more clarity on the level of housing growth that can be accommodated along the corridor. Site by site policies provided and are to be accompanied by a capacity schedule.
10	Form	Resident	Need for landscaping against NCR. Primary schools are already over subscribed. Poor parking. New housing plans are far too large for the area and should be scaled down. Refurbishment of the existing properties is clearly what the local community wants. Can you therefore give assurances that no planning permission will be given until the plan is finalised?	Comments noted and agreed. To be addressed via the public realm and open space elements of the NCAAP. NCAAP Policy 10 – seeks to secure appropriate contributions towards open spaces, waterways and the Blue ribbon network.
11	Form	Southgate District Civic Trust	Agree with vision and Neighbourhood Places. Agree Arnos Park neglected. Against major enlargement of A406 capacity. Improved provision of school places required. Agree with approach to backland development. Strong reservations about the redevelopment of Ritz Parade. Agree with proposals to Green Lanes area. Should work with EA to improve Pymmes Brook.	Comments noted.
12	Form	Savills	Support the principal of the redevelopment of the Western Gateway Site for mixed use.	Comments Noted
13	Email	Resident	Formal objection to planning app from NHHT. .	Comments noted, however individual planning applications will be considered and

				determined by the Council's Development Management Services and where necessary the Council's Planning Committee.
14	Email	Resident	<p>Against overdevelopment. Transport proposals will reduce safety. Lack of school & health care provision. Detailed landscape & biodiversity strategy is a fundamental priority. Object to high rise buildings. Agree with cycle/pedestrian routes. I do not agree with the approach as laid out as you have not provided sufficient information. In summary, any plans should be laid out in plain English and include the provision, exact pound shillings and pence being made relative to this area and not subsumed into Council coffers to cover infrastructure investments elsewhere. Greater definition of what is meant by "landmark buildings" is required and these should follow the principle of matching in with adjacent buildings,</p> <p>i.e. a nine story block of flats in front of two story house is not on! The rules upon which the Council will grant permission to developers must be disclosed fully and local residents must be at the heart of this decision making process. As a part of the application process and in particular Notting Hill should be required to publish exactly details of their consultation and as required under Planning Rule disclose the names and address of those that provided comment.</p>	<p>The need for community and social infrastructure and facilities is agreed and is to be recognised by the Proposed Submission version NCAAP. NCAAP provides clarity on how community and social infrastructure priorities. Including within section 3.2 'What makes for sustainable communities'; NCAAP Policy 4: local Education, NCAAP Policy 5: provision of modern healthcare. NCAAP now provides a clear steer on what is considered 'tall' and where Policy 7: Building heights and development densities. Site specific policies provide detailed guidance on appropriate building heights and densities.</p>
15		Resident	<p>Serious health & safety concerns resulting from increased traffic. - in principle but the effect of changing the traffic system to one-way traffic in roads south of the North Circular Road has virtually destroyed the quality of live in Grenoble Gardens due to the high traffic volume. This has serious health and safety implications and if not addressed will</p>	<p>Comments noted.</p>

			destabilise the neighbourhood as people will move out or rent their properties to escape the noise pollution. Agree with cycle/pedestrian routes	
16	Email	Resident	Agree with A406 improvements. Variety of housing required (not all social housing) More school places. Increased open space required. Against backland development	Comments noted. NCAAP provides a framework for housing, education, health and identifies which opportunity sites may be appropriate for scope for back land development. The adopted Core Strategy established the affordable housing policy approach housing from new development borough-wide. which seeks 40% affordable NCAAP now provides a framework for transport, housing, education and scope for bac kland development.
17	Form	Resident	Agree with vision and Neighbourhood places More healthcare provision required. -Opposed to gated access.	Unclear as to what is meant by gated access, no proposals of this kind are put forward by the NCAAP. NCAAP provides a framework for housing, education, health and scope for back land development.
18	Form		More open space/green space & leisure facilities. Required No to backland development. Agree with 3 Neighbourhood Approach	Comments noted NCAAP Policy 10 – seeks to secure appropriate contributions towards open spaces, waterways and the Blue ribbon, The plan identifies where back land development may be appropriate as an exception to the general

19	Letter/ email & Attachment	Bowes Telford Community Action Group	<p>Major concern that the document reads as a 'housing action plan' and less Area Action Plan. Q01. What is your image of the area? (p11): Run down & shabby appearance encourages fly tipping and squatting. 1.6 NEW INVESTMENT (p13)Detail of what NHHT will provide in terms of community infrastructure would be welcome. 2.3 THE COUNCIL'S POSITION ON FUTURE A406 IMPROVEMENTS TO REDUCE CONGESTION (p18) NCAAP states 'the current capacity of the A406 alongside a shift towards more sustainable travel patterns can support the new population growth'. What rubbish. TfL have continually made it clear that the A406 scheme does not aim to relieve congestion and that it is a safety and environmental improvement scheme. With more houses in the area being converted into flats and the NHHT plans to build 100's of new flats- side roads and the A406 will be come more congested than ever. Q02. Do you agree with the position on future A406 improvements? (p19) This question does not make any sense. Once the road scheme is complete the A406 will continue to be congested, Warwick Road, York Road and Highworth Road will become even busier and TfL have failed to address the concerns of those living in the Pevensy/Bexhill/Hastings area with a view to joining the A406. Q03. Do you agree with the vision for the area? (p20) Over the past decade or more local people have seen a multitude of 'visions' for the area, ie words on paper. I Whether we agree or not with the latest vision is of little importance, what matters is what actually happens. Q04. Is there anything missing from the vision? (p20) How about a commitment to a wildlife corridor through the area? A vision of 'green lungs' with the planting of broadleaf trees that would not only greatly improve the air quality and absorb noise from the road but also make the area look better. Q05. Have we got the right objectives for the area? (p21) The</p>	<p>The adopted Core Strategy already confirms the policy approach on housing led regeneration for the NCAAP and this was subject to public examination in 2010. A target of 2000 homes was adopted and the proposed submission NCAAP will refine this figure. The transport evidence behind this 2000 housing figure concludes that capacity of the A406 (alongside a shift in travel behaviour) can support this population growth. The implemented TfL improvement scheme did not set out to provide additional capacity; NCAAP will continue to take a policy position that seeks to work with TfL to work on capacity improvements. NCAAP will give recognition to the need for environmental improvements and the need to secure additional capacity in the future.</p> <p>NCAAP provides a framework for housing, education and the appropriate scope for backland development opportunity.</p>
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		<p>objectives cover just about everything without providing any details or targets. 3.3 THE SPATIAL FRAMEWORK (p23)</p> <p>‘Parts of Bowes Ward south of the A406 are deficient in the provision of open space which will be an issue that new residential developments will need to address’. We would suggest that the empty plots along the A406 not be built on but be developed into open green spaces, giving the area room to breathe and the planting of trees on these sites would help improve air quality and absorb noise. 3Q06. Do you think more school places are required? (p24) Yes. One extra form entry at Garfield Primary School might manage the extra children expected on the Ladderswood estate but it will not manage schooling needs across the whole of the NCAAP. Q09. What kind of health facilities are needed? (p25) With such a massive increase in population anticipated more local surgeries will be needed. Q10. Do you think existing local centres are the best and most appropriate locations for new community facilities? (p25) Arnos Grove Pool has brilliant staff, both lifeguards and teachers, but public swim times are very, very limited. Arnos library needs to be opened on more days and for longer hours. We need a local bank/building society, a post office. Play areas on the south side of the A406 would be good for local children. Where new community facilities should be based would need to be considered on a case by case basis. Q11. Are these the right spaces to improve if the opportunity arises? (p26) What is meant by ‘if the opportunity arises?’ surely the point of this NCAAP is to make a wholehearted effort to improve the area and NOT ‘if the opportunity arises’. Q12. Are there other spaces we should be looking to improve or provide access to? (p26)</p> <p>The NCAAP makes it very clear that there is a lack of green space in the area. Empty plots along the A406 should not be built on but help to</p>	
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		<p>make up a wildlife corridor. The New River path and Pymmes Brook trail need to be enhanced, managed and promoted. Q14. What sort of improvements would you like to see? (p26) A commitment to protecting the small amount of green space we have with a view to improving both quality of life and air. Q16. Do you agree with this approach to backland development? (p27) We completely disagree with such development. This document continually talks about the lack of green space in the area. It would be very wrong to take away the green space people have at the back of their homes. Q18. Is air quality an issue for you? (p28) We challenge whether it is legally right to build high-density housing on small plots along the A406. Q19. Do you agree to the approach to improving air quality in the NCAAP? (p28) This approach is laughable. Talking about the positioning of rooms, doors and windows in new build will not improve air quality. Stacking families one on top of the other and failing to provide school places will make air quality worse. ‘Landscaping and biodiversity proposals will also play an important role in the mitigation of pollution’. The only plans we have seen are for big roads and tall buildings. It’s unlikely that the TfL A406 shrubs recently planted will play any great role managing pollution. Q20. Do you agree with the approach of locating taller buildings in local centres along the North Circular but not within areas of suburban character? (p29) We anticipate NHHT building whatever they want wherever they want with little regard for the suburban character. Q23. Do you agree with the Three ‘Neighbourhood Places’ approach? (p35) We neither agree nor disagree with this approach. Q24. Have we identified the right places? (p35) Working closely with the Ritz Traders on development of the Ritz Parade would be welcomed. Q25. What are your views on this draft guidance for the New Southgate/Arnos Grove</p>	
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			<p>area? (p41) We would need to see more detailed plans but we are horrified at the thought of development (however 'sensitive') in front of Bowes Rd library and swimming pool and around Arnos Grove tube station. These 1930's buildings and surrounding areas should be protected and appreciated. These are our landmark and gateway buildings the council is so keen on. Q26. Have we identified all the required improvements for this area? (p41) Where to begin? (a) We are disappointed by the poor quality and finishing to pavements, plants and street furniture along the Bowes Road. After decades of neglect we anticipated a much higher specification. The huge new bridge was designed with landscaping around it including miniature trees. To date there is just hard concrete. When should we expect a softer landscaping around the bridge?</p>	
20	Email	Resident	<p>I missed the consultation but I would like to put these suggestions forward:</p> <ol style="list-style-type: none"> 1) Top end of Green Lanes towards Clockhouse Junction: plant trees along the pavements. There is plenty of space here and this would enhance what is quite a vibrant but rather ugly street landscape. 2) Road junction at Clockhouse Junction: please do something about the dreadful situation when turning right out of Green Lanes into the North circular. This junction is far worse now after the road improvements than it was before. There is no filter, and cars have to stop on lines of the box junction otherwise only one car would ever get across before the lights changed. At least you could put lines directing right turners to 	<p>NCAAP is a strategic planning document has little influence over the implementation of the TfL improvements scheme and the associated snagging issues. These are being resolved via the council's highways department and TfL directly.</p>

			<p>the right of the oncoming right turners from Palmers Green to avoid congestion.</p> <p>3) Replace the missing tree at the beginning of Belsize Avenue, and make a drainage hole for rainwater at the base of the slight slope the other existing tree is planted in. At the moment, that poor tree doesn't get the benefit of run-off rainwater as the lower half the planting space is tarmaced over and the rain runs straight off onto the paving stones. The tree is half parched all year round and will die soon at this rate.</p>	
21	Email & Attachment		<p>With a few exceptions, the majority are long term owner/occupiers in the 'hamlet' of Pevensey Avenue and Bexhill and Hastings Roads, N11., who have endured living on the front line of urban degeneration, anti social activity, the 'safety and environmental' A406 'improvements', which turned a 3 lane road into a 6 lane urban motorway, along the Telford Road section, to which Pevensey-Bexhill- Hastings (and our opposite neighbours at Milton-Chaucer-Shakespeare) are completely locked in by. I would also welcome a list of all the advantages to our residential community, both present and future We need - the restoration of family homes and are against multi-storey blocks; vital road safety features; local medical clinics specialising in the frequent monitoring of chronic conditions e.g. anti-coagulation testing for heart problems; broad leaf trees to create green lungs along the A406; open green spaces; financial institutions; a department store. The 'three Neighbourhood Places' need breaking down into areas with identical requirements; the Telford Road corridor has problems that other areas don't and vice versa.</p>	<p>Comments noted NCAAP seeks to provide the adopted Core Strategy position on providing a mix of housing types, including the pressing need for family accommodation.</p>

22	Email	Resident	<p>I welcome the North Circular Area Action Plan, however there are a couple of areas where I think it could be improved.</p> <p>1. Explicit noise limits inside homes I think that it is very important for the long term viability and vitality of the housing that the potential noise issues from the road are adequately addressed. I believe that at the next stage rigorous noise limits should be explicitly set out for the interior of properties to ensure that developers meet high standards and do not cut corners for short term gain.</p> <p>2. Planning for an appropriate mix of homes for specific development sites. To maximise the potential of the development sites for the community I believe that Enfield Council should set out in conjunction with residents a suggested mix of units for each development site so that the new developments are appropriate and meet the need of existing and potential residents rather than just the developer.</p>	<p>Comments noted. Sustainable Development design codes and standards are set out in additional guidance on housing design and all planning applications are subject to meeting established standards and or good practice. NCAAP seeks to provide the adopted Core Strategy position on providing a mix of housing types, including the pressing need for family accommodation.</p>
23	Form	Resident	<p>Agree with vision and Neighbourhood Places agree, suggest attracting a major retailer & improve parking. Very pleased with improvement proposals. Would like to see Broomfield House redeveloped.</p>	<p>Comments noted. Ritz Parade is within Bowes Local Centre, the centre has been consolidated to the south and extended on the north and west to create both an opportunity for parking and attracting a viable and modest foodstore.</p>
24		Residents		<p>Comments noted. The majority of issues</p>

		<p>We have looked at the “Towards the Pre-Submission Stage” document. It is rather hard to tell exactly what is proposed as the document is generally very vague. Other residents who only looked at the AAP may find this aspect misleading as it appears all proposals have been dropped, which they have not. If you have not received many comments on this, that may be why. Majority of comments related to individual development proposals of NHHT. What would the landmark building be? Would it be commercial or residential? On page 37, Towards the pre-submission stage states that 'the height of new development should respond to the site's immediate context'. The immediate context of the Wilmer Way/Telford Road/Bowes Road/A 406 junction is of suburban housing. In response to question 16 on page 27, it would be helpful if rear access yards could be controlled with gated access. Footpaths on rivers - Would the proposed footpath along the Pymmes Brook between Wilmer Way and Powys Lane be well lit and patrolled? We are concerned that this could become a no-go area where youths will gather, smoke, drop litter, vandalise property, etc.. School provision We note that Garfield School may be increased in size. This is only good if the school improves. Overcrowding All the proposed housing will increase population. On page 24 of Towards the Pre-submission stage it is estimated that the local population will grow by about 3,700 by 2026. Is this a good thing? It is already a densely populated and heavily built-up area. Seafield Road Seafield Road should be reopened to cars. Often long traffic jams form on Bowes Road queuing at the junction with the A406. Arnos pool area Arnos Swimming Pool and library should be preserved as an example of 1930s architecture, as should the underground station. This means that they should not have anything substantial or large built next to them.</p>	<p>raised are outside the remit of this planning document, however, NCAAP does address the need of Building Height and Development Density in NCAAP policy 7.</p>
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25	Form	Resident	Vision - agree - Neighbourhood places - agree Any redevelopment should have adequate parking.	Comments noted. Parking standards are set out in the emerging Development management Document and adopted London Plan.
26	Email + attachments 1 x word response 5 x photo attachments	Edmonton Rangers	<p>We note that on page 51 of the NCAAP document you say ‘While currently privately owned, the open space adjacent to Cherry Blossom Close which may provide an opportunity to provide a new public open space...’ In 2008 this site was granted planning permission and subsequently 2/3 of the land had flats and houses built on it, Millicent Grove. The 1/3 that remains, according to the planning permission granted, should be a private playing field with pavilion, TP/06/1845/RM1.</p> <p>We would ask that Enfield Council go back to Fairview and tell them to complete the job with a pavilion and playing field on-site. We would then like to use the facilities as our second site.</p> <p>We find ourselves in a position of needing more space.</p> <p>(1) We are a growing club with more children wanting to join us each season</p> <p>(2) The Football Association recently changed its pitch size requirements and we now have to provide larger pitches for matches.</p>	Comments noted, and the S106 agreement accompanying the planning application will need to be amended to allow for wider public access and enjoyment of this open space asset. The NCAAP would support the wider usage of this space if the existing S106 legal obligations could be overcome.
27	Email	Unknown	Email Attachment did not open – request sent for Ms Yeung to resend	
28	Email	Resident	Objection to Waste Plant at Pinkham Way	Noted
29	Email	Resident	Objection to Waste Plant at Pinkham Way	Noted

30	Email	Resident	Objection to Waste Plant at Pinkham Way	Noted
31	Email	Resident	Objection to Waste Plant at Pinkham Way	Noted
32	Email	Resident	Intentions are admirable. However, I feel that there are two hugely significant failures in this document.. The first is to assume that improving one or two access ways will enable two halves of an area to become a 'community' is, at best, naive and, at worst, wilful blindness about how humans behave. Saying that the A406 links the three areas and will not divide each one in two is nonsense. The second failure of your document is the complete lack of reference to the proposed development of the biggest waste disposal site in Europe just around the corner from your future optimistic regeneration. If the development of the plant goes ahead, the fallout will completely destroy any hope of creating functioning communities along the North Circular whatever you do to the living areas.	Noted
33	Email	Resident	Decent, useful retail units that will invite retailers that will serve and be of use to the community, most of whom are families or young professionals. Open spaces of greenery, including small plots for parks/play areas for children. Community facilities that will bring the area to life and create an area that people will want to visit/live/work in. Community cafe/community centre. A post box!	Bowes Road Local Centre consolidated and seeks to attract a more vibrant offer. Day to day retail needs such as post office are also noted and would be supported.
34	Email	Resident	Objection to waste plant - An increased flow of traffic from Pinkham	Noted

			Way would quickly congest the recent road improvements and bring noise and pollution into the Action Plan Area.	
35	Email	Barnet & Southgate College	Objection to waste plant	Noted
36	Email	Southgate Green Association	Objection to waste plant	Noted
37	Email	Resident	Q12: Investment & improvement of area is welcome. Remainder of email is an objection to Pinkham Way.	Noted
38	Email	Resident	I wholly support the comments made by the PWA with regard to the plans affecting the boroughs in Enfield, Haringey and Barnet (and surrounding areas) and as they affect neighbouring boroughs with increased pollutants by way of traffic, noise and vehicle emissions.	Noted
39	Email	Resident	I support the AAP in general and have been please to see that now the TfL A406 works are underway the blight that has afflicted the corridor has lifted at the housing stock that has been long neglected is being renovated and brought back to its rightful place. I agree with the encouragement to more sustainable modes for shorter journeys. however I have one concern in that while Core Strategy shows the western end of the area, around the railway and the north end of the Bounds Green Road as a major green space, is in conflict with	Noted

			Haringey's desire for changes to their emerging Core Strategy – including a change of the underlying planning designation for the Pinkham Wood site.	
40	Email	Resident	As a Barnet resident living fairly close to the proposed development area - I welcome the intention to invest in and improve the area. However, I think that it's success could be lessened - even interfered with - if the Council continues to support the proposed North London Waste Authority plans for Pinkham Way	Noted
41	Email	Resident	We, in Muswell Hill Road, are totally opposed to the proposed recycling plant in Pinkham Way	Noted
42	Email	Resident	I live in Haringey but very close to the border of Enfield in Warwick Road, and therefore am aware of the improvements that Enfield council are suggesting in the North Circular Area Action Plan. Much good work has been done and much is still under consideration. But it is manifestly obvious to many of us who live in this area that should the proposed Pinkham Way development go ahead unchecked all these improvements would be lost.	Noted
43	Email	Resident	I do hope that my comments will be welcome though I live in Friern Barnet. I pass through the area a lot and frequently use the shops on the Betstyle Roundabout. I have been so pleased to see Enfield making serious efforts to redevelop and improve the area blighted for 40 years by the NCR improvement plans not happening. Traffic flow is also important. Changes were made to allow east flowing traffic off the NCR before it reached the three lane section at Bounds Green. Friern Barnet	Noted.

			Road was coping until the mini roundabout at Station Road/Bankers Draft was removed. The effect has been to create "rat runs" through roads bounded by The Ridgeway, Crescent Road and Beconsfield in order to join Friern Barnet Road further down. If changes are made to the Betstyle roundabout which reduce traffic flows it is likely to increase "rat running" in the area What is even worse is the proposal to build a recycling works and dustcart base on Pinkham Way. No matter how well installed they are there will be noise, smells and considerable traffic pollution coming from the site.	
44	Email	Resident	I am sure that the improvements you are suggesting around the North Circular Road, (Arnos Grove, New Southgate, Palmers Green, Bounds Green etc.) will definitely be welcomed by the vast majority of the residents. These vision will make these areas vibrant in both commercial and social point of view. In answer to your Question No. Q12 there is a big threat (and I mean a big threat), which is the PINKHAM WAY WASTE Project. This totally unreasonable project will not allow you to keep the traffic down, will not allow you to construct news schools, new leisure centres, new business centres, to keep the pollution levels down as much as possible, etc	Comments noted
45	Letter	Bounds Green & District Residents Association	Comments relate to Open Spaces (slips) are between Tewesbury Terrace and the Bounds Green Road and the detailed works between Warwick road and the NCR - attention to detailing.. As opportunity sites are identified close to these slips can improvements to them be secured via S106? pathway between both slips could be shared walking cycling.	Need to address whether there is the possibility.
46	Letter	DHA	Primarily New Southgate Industrial Estate - promoting the complete	There is no evidence to support the de-

		Planning - representing New Laderswood LLP	redevelopment of the Estate, and not partial as previously indicated in the earlier AAPs to allow the redevelopment of the estate to contribute towards strategic housing targets. The development potential of NSIA is missing and this should be included within the stage of the AAP	designation of the Estate from LSIS. Local employment is a primary objective of NCAAP
47	Email	Resident	High quality housing etc– yes but is this just on paper or do you wish to cram as many flats as possible to deal with your targets in an already dense area? If this is the case, the council should look in less dense areas to build flats. What TFL planned for the area was far from what they delivered. Where was all the green they promised and look what happened to the junction of Powys Lane and Bowes Road. The phone mast and galvanized fencing was a disgrace and it has taken local residents to get some improvement implement but does not go far enough. Definitely more greenery and space is needed. Not more housing as that leads to increased density and congestion. This would greatly uplift the area visually and reduce air pollution. What objectives do you have for the Broomfield Estate? I am not clear as to what your plans are here and more importantly why is it included? There is no relationship to the Bowes area. Primary and secondary school places need to be addressed. The New River path and Pymmes Brook trail need improving. Strongly appose backland development.	The majority of the issues are a direct consequence of the TfL Improvement Scheme and will be directed through SWEP. NCAAP seeks to address the issue of education provision in line with the Council’s primary and Secondary Strategy.
48	Email	Residents	The A406 is a main route road not a suitable place for communities to come together with the very busy, noisy polluted road which in some parts has been helped by the regeneration for flow of traffic, but not for the pollution which the scheme was to address with green spaces. .Because buildings have been removed and large amount of trees have	Comments noted

			<p>been cut down noise pollution from the A406 is now a problem for us living in Powys Lane. Road noise from the A406 travels much further down Powys Lane than before. The regeneration plans state it was going to reduce noise pollution to the local area. The North London Assembly Hall provides no community use to any of the local residents. In fact it brings more congestion to the roads on Saturday and Sunday with cars and coaches parked all day long in Powys Lane and surrounding areas. If more homes are built along the A406 and local area ,how is the Council going to improve congestion this will add on the A406. The current scheme does not improve the capacity only the safety and the environment. No we do not agree with the approach to air quality. Was this problem discussed when the Government who gave £56,000 to NHHT to build new homes, on an already polluted road. Where are the landscaping and biodiversity proposals being implemented on the A406 to help with air pollution. We completely disagree with tall buildings along the A406. They are out of character with the existing buildings along Bowes Rd and Telford Way. They are also not suitable for families.</p>	
49		<p>Bounds Green Village Residents Association</p>	<p>Telford Road / Bowes Park and Green Lanes neighbourhood places: Bounds Green Village Residents Association strongly object to any area of the North Circular Road being developed as a neighbourhood area. Arnos Grove neighbourhood place: Assuming the accommodation of trees, air and in-sync architecture, bearing in mind this development area is of a sufficient distance away from the North Circular Road, no objection is raised by the Bounds Green Village Residents Association to the proposal. BGVRA Concerns: Five storey and four storey developments would be</p>	<p>Comments noted</p>

			detrimental to the visual amenity of the area are not in keeping with the predominately two storey homes in the area.	
50		Resident	<p>I have filled in the NCAAP consultation form online. However, I need to add several other points that are concerning me: I don't believe Enfield Council has consulted sufficiently - the period of consultation has been too short. I am also concerned that the proposals will have an impact on local businesses.</p> <p>But above all, I am most concerned (and surprised at) the Council's failure to even mention the proposal to build the huge waste management facility at Pinkham Way. The impact of hundreds of trucks trundling along the North Circular Road on our local environment will be significant and will undermine the improvements being proposed. We need the consultation to be extended and we need the NCAAP to say no to Pinkham Way.</p>	Comments noted
51		Resident	<p>The vision should focus on maintaining traditional residential styles in residential areas, promoting owner occupation by families and not private renting and multiple occupancy/multiple vehicles. Environmental improvement – parks, open spaces and public realm. Public realm, parks and open spaces form a vital part of any neighbourhood, creating spaces, facility and opportunity for communities to come together and interact. The area along Tewkesbury terrace desperately needs attention . The NCAAP should directly oppose any new development which will have any adverse impact on air quality. I agree with the proposal to locate tall buildings</p>	Comments noted

			<p>away from residential sites and closer to the road corridor, but have reservations about any implicit assumption that “landmark buildings” are necessarily to tall buildings. NCAAP fail to deal with Pinkham Way and is flawed in terms of Bowes Primary school. In addition to this, there has been insufficient time to respond to the consultation and there has been insufficient publicity or opportunity to attend exhibitions. Further consultation and exhibitions are required.</p>	
52		Resident	<p>agree with much of what I read - but, currently, a failure to openly and seriously consider the implications of a huge waste plant and vehicle depot so close to the NCAAP site make it difficult to see how it will achieve all of the regenerative benefits that it sets out to do. There are huge issues around traffic that the pre-submission document does not even mention. It is mentioned more than once in the document that the issue of congestion is not addressed by the ongoing or planned changes to the A406 – that these changes only smooth traffic flow and make the area better for pedestrians. It is well known that the four-lane bottleneck West of the intersection with Bounds Green road cannot be sorted out (I believe that a listed bridge is part of the problem?), so that congestion is always likely to be an issue (this stretch of road is recognised as one of the top ten worst for congestion in London – sometimes at the very top of the GLA list). With this in mind, there is a potentially huge problem down the line with a massive waste plant at Pinkham Way generating 1200+ vehicle movements a day.</p>	

53		TfL	<p>The suitability of high density at Ladderswood and Western Gateway need to be considered in the context of access to public transport nodes. Arnos Grove Station - (paragraph 9 page 39) suggest the release of land west of site is reliant on the consolidation of car parking spaces on land to the east. It remains unclear whether the sites are intentionally linked this requires clarification: 1. the assumption of a proposed deck structure is dependent on engineering constraints and commercial viability and has not been explored. 2. Commercial decision regarding construction, maintenance and operation of a future structure will still need to be made and how this impact on any development brought forward. The document does not at this stage allow for a reduction in commuter parking. This is a point that should be reflected in the document as a decked structure may not be deliverable. A statement justifying a reduction in car parking will should be provided, thus providing the necessary flexibility to bring forward development. (Paragraph 4 9page 43) should state new development should be accessed via side roads, not directly from NCR. Enfield Council is currently engaging with Transport for London to confirm the short- and mid-term strategy for improvements along the North Circular, including the likely infrastructure requirements. The agreed position will be reflected in the next draft of the AAP.</p>	Comments noted and agreed.
54	Letter/email & Attachment	Resident	<p>A positive way forward is urgently required, together with a sound North Circular Area Action Plan. This is vital in order that the Authorities can restore sound town planning, meaningful public consultation, and liberate residents and traders from planning blight, whether caused by historic failures relating to the A406. ; or threatened</p>	

		<p>by over developments sought by developers; or fragmented actions by the Authorities; or a flawed and unethical proposal for a giant waste plant at Pinkham Way N11 – please refer to enclosed press coverage. The journey along this part of the North Circular Road acts for many visitors as a gateway to the Borough of Enfield and therefore is central in forming important first impressions. However, even more important is the appalling reality into which residents and traders of the locality have been placed in being deprived of their human rights, proper governance, services, and town planning protection on account of the North Circular 40 plus years planning blight avoidably created by the Authorities. A relevant 1974 plan sent to the authorities at that time and showing how the planning blight could have been avoided has been shown to Cllr Achilleas Georgiou and will be submitted in documents to follow. The importance of these issues has been compounded by the lack of investment in the immediate corridor either side of the North Circular Road and the transient population living alongside the road due to short-term lets. This lack of investment has led to (2) concentrations of antisocial behaviour which has further eroded the faith held by people in delivering improvements in this important part of the Borough.</p> <p>Residents and traders can only help to make the area better when the Authorities cease their dereliction of duties and restore democratic and proper governance linked with proper town planning and meaningful public consultation. This is urgently required. With respect, Cllr Del Goddard will need to be responsive to the views of local residents, traders, and councillors of the affected wards. Actions by Transport for London and Skanska are not being co-ordinated, and discrepancies are arising between the</p>	
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55	Email	Resident	<p>I am writing to you to express my concern about the proposal to put a large housing development on the A406 at the junction with Wilmer Way. As a local resident who has already been severely disrupted by all the other works I feel very strongly that this large development will put a huge strain on the local community, particularly in terms of parking and schools. In fact one of the recent major works - the huge eye-sore that is the new bridge - not only appears to be significantly underused but is also now a haven for teenagers to hang out at all hours and certainly does not have any of the 'green' area promised on the original plans. The addition of another 140 properties is clearly far too large for this small area and as a resident I would like to see the existing homes</p>	Comments noted

			refurbished for families, together with some landscaping and trees.	
56			I am writing to make my objection known to the proposed building of new apartment blocks on the A406 at the junction with Wilmer Way. I am a local resident and am convinced that the proposed flats are completely out of keeping with the surrounding residences. The flats and large influx of people will put a strain on the surrounding area in terms of parking and schools. A much more suitable proposal would be to renew the existing housing on the sites into family homes - in keeping with the surrounds. I am told that the new Wilmer Way footbridge - itself an unnecessary and barely used eyesore - is being used as a reason why the houses cannot be renewed - this doesn't hold much water and local residents are almost universally opposed to the ill-advised proposed flats. I would be grateful if you would register my objection formally and look forward to a response at your earliest convenience.	Comments noted
57			Q12. The investment in, and improvement of this area is very welcome. However, the success of this effort and expenditure is at risk of being ruined by a clear conflict of policy priorities at Enfield Council. This conflict is the support that the Council has given, so far, to a proposal, by North London Waste Authority to build one of Europe's largest waste processing plants at Pinkham Way, together with Barnet Council's refuse vehicle maintenance and depot right on the boundary of the Action Plan area. This would be a major blight on all the improvements being made by Enfield Council in the Action Area. The traffic generated around the vicinity by this development would wipe out any benefit from the recent road improvement works (there was no provision made	

			<p>for additional traffic). The NLWA have admitted their plans will involve more than 1,000 heavy vehicle movements per day travelling through or in the immediate vicinity of the action area from seven north London boroughs. Furthermore, official documents obtained under the Freedom of Information Act show that 24-hours per day, 365 days per year operations are envisaged on the site, generating smells and noise and pollution. There is a shortage of open space in Enfield (and Haringey). The new information about the planning classification of the Pinkham Way site is likely to result in the site becoming virtually undeliverable. There is now a great opportunity to give the Action Plan Area a wonderful recreational open space on its doorstep.</p>	
58	Email	MP for Enfield Southgate	<p>It is also extremely disappointing that the NCAAP document was not made more widely available to residents and provided in the local libraries at a much earlier stage thus ensuring that more local residents were given the opportunity to fully respond to the contents of the consultation and the proposals for the local area. I am very concerned that there need to be practical solutions to deal with serious problems affecting shops in the area who have seen business diminish during the North Circular Road works.</p> <p>The NCAAP needs to address the issue of the proposal for the North London Waste Authority's Pinkham Way Waste Management and Treatment Centre. A significant number of local residents oppose the proposal and wish to see the ecological and environmental value of the site preserved. The NCAAP should give its explicit view that the proposal to install a huge waste management centre and the resulting impact in relation to traffic movements would have a detrimental impact upon the local area. I reiterate my previous concerns about the</p>	<p>Comments note Public consultation was extensive and covered a period of 12 weeks with an 18,000 property leaflet drop, community events, including community lunch, area forums, Enfield – On your Doorstep events..</p> <p>Pinkham Way is outside of the Enfield administrative boundary therefore the NCAAP has limited influence over the future of the old sewage treatment site which sits in Haringey Borough.</p>

			disposal of the Old Southgate Town Hall Site particularly that the Council have not considered the opportunities for alternative community uses for the Town Hall including educational use as a school or use as a health centre which is a greatly missed opportunity to improve community provision in the local area.	
59		NHS South West Health Group	<p>KEY RECOMMENDATIONS</p> <ol style="list-style-type: none"> 1. Health and wellbeing should be included in the vision for the area and in the objectives. 2. Reducing health inequalities through building health into local environments should be one of the key objectives. 3. A Health Impact Assessment should be commissioned, to fully understand the health consequences of regeneration proposals, and a detailed mitigation plan should be put in place to deal with any identified health risks. 4. Resources need to be devoted to ensure that walking and cycling routes and green spaces are visibly safe and attractive for active recreation, and to encourage residents to use cycling and walking as a means of transport, as well as leisure. 5. Steps must be taken to strengthen existing local health networks and infrastructure, including pharmacies, dentists, health centres and children’s centres – improving promotion, signposting and ease of access locally. 6. Community facilities should prioritise providing specific support to young parents, children in the early years, and vulnerable children in 	Comments noted

			<p>mobile families.</p> <p>7.. The Council regeneration team should prioritise the provision of a suitable location for the development of sexual health services in the area.</p> <p>8. Planning must take into account the health and wellbeing needs of older residents including security and mobility, to reduce social isolation.</p> <p>Health and wellbeing should be included in the vision for the area and in the objectives. Reducing health inequalities through building health into local environments should be one of the key objectives.</p>	
60	Email	Resident	Investment & improvement of area is welcome. Remainder of email is an objection to Pinkham Way.	Comments noted
61	Email	Resident	Investment & improvement of area is welcome. Remainder of email is an objection to Pinkham Way.	
62	Email	Sport England	Sport England support the identification of open spaces, although we recommend that specific reference is made to the requirement for formal open space (outdoor sports facilities). Furthermore, reference should be made to the need for indoor sports facilities.	
63	Email	NHHT	Taken as a whole, the NH sites will deliver a substantial part of the anticipated regeneration benefits (such as new affordable, private sale and shared ownership homes, a mixture of family and single person accommodation, community facilities and new employment opportunities). It should be noted that the statement on government	<p>Comments noted.</p> <p>Updated figures noted as to is the funding status. The need for community and social infrastructure and facilities is agreed and is to be recognised by the Proposed Submission</p>

		<p>funding is not up-to-date. The £54 million awarded in 2009 (not in 2010) was also to purchase the land and properties from TfL. This acquisition cost NH £56.9 million. The funding for the new build element was withdrawn as part of the comprehensive spending review, so public funding now stands at a contribution of £45.2 million towards the purchase and refurbishment works. NH's contribution will now be completely different due to funding changes. One of the development sites (no. 10) had the potential to be blighted by a safeguarded future road scheme. The provision of policy clarification in relation to infrastructure provision will go some way towards ensuring that a comprehensive development of this site can be realised. Objectives (Section 3.2) There are many factors which will influence whether existing housing should be refurbished or not. One factor is 'viability', the other is the opportunity to create an improved environment via comprehensive development, and to deliver new homes that more adequately meet the demands of the NCR in terms of its challenging environment, including air quality and noise. A new build project provides the opportunity to respond more creatively to this environment, including amenity space positioned so as to negate the worst impact of the NCR. It should also be recognised that NH's site (development sites no. 22 and 23) are suitable for residential development. In relation to Question 20 and 21, it is considered that specific reference should be included within this section to the other potential suitable locations for taller buildings or an overall increase in height. This should include the key nodes/intersections along the North Circular Road, such as the Wilmer Way/Telford Road Junction (Sites 11 and 10), where opportunities exist to deliver comprehensive schemes providing additional height and densities, in an area with good</p>	<p>version NCAAP. NCAAP provides clarity on how community and social infrastructure priorities. Including within section 3.2 'What makes for sustainable communities'; NCAAP Policy 4: local Education, NCAAP Policy 5: provision of modern healthcare. NCAAP now provides a clear steer on what is considered 'tall' and where Policy 7: Building heights and development densities. Site specific policies provide detailed guidance on appropriate redevelopment options, building heights and densities.</p>
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		<p>passenger transport accessibility (PTAL 4). Increased height and density in this location would provide the potential for an improved relationship of these sites to the existing foot bridge to be created, whilst providing new housing that responds to the conditions of the road and delivering a 'step change' in terms of the type and quality of development in this location. In addition to the above, and the reference to the local centre at Green Lanes – which is supported by NH as a location for potential taller buildings - specific references to Sites 13 & 14 (Ritz Parade & Bowes Road Local Centre East) should also be added into the text in this section to support the provision of additional height and densities in relation to the local centre located on Bowes Road and the adjoining development sites. A further site for residential development should be identified on the western side of Wilmer Way (opposite site 11) with the capacity for circa. 6 new dwellings to the front of the site, and with potential for additional residential properties to the rear. In addition, the potential for the redevelopment of the front part of Site 11 should be included on the plan/table with a potential capacity for 55 units overall on Site 11. NH contest the assertion in Point 5, structure and urban form, that the buildings on the south west side of the junction should be retained and refurbished where possible. Whilst this may ultimately result in a more financially viable option, the site to the southwest of the Green Lanes junction does offer the potential for redevelopment to deliver significant improvement in terms of both the commercial, community and possible health offer and delivery of residential properties. This site has the potential to act as a catalyst for further development in the local centre and this corridor as a whole.</p>	

	Form	Resident	There are more positives in this document than negatives.	Comments noted
64	Form	Resident	Agree with vision and Neighbourhood Places. Large house opposite ST Hall library could be put into community of housing use.	Comments noted. Truro House falls outside of the NCAAP boundary and is itself the subject of a planning approval that allows for it's refurbishment along with some enabling development. The approval is subject to a legal agreement.
65	Form		Disagree with vision, over development and poor environmental conditions.	Comments noted.
66	Form	Resident	Poor issues around parking.	Comments noted.
67	Email	Resident	Q01. Our image along the A406 is very run down and deprived looking. Page 13. TFL have not improved the environment on the A406. 1.6 What community infrastructure will NHHT be providing? Q02. How is the Council going to improve congestion on the A406. With a total 1500 new homes by 2025 and 2000 new homes by 2029/30 schools cannot be an aspiration. Especially when there are not enough spaces and people already have to travel out of the area for a school. Q03. The council's vision is a dream only. How is the quality of life going to improve for existing and new residents with a mass over development of new homes. Q04. The green corridor that we were promised with trees, hedging, shrubs and grass either side of the A406 to screen the pollution and noise of the traffic has not been implemented. Q08. Broomfield House and Southgate Town Hall could be new medical centres and improve Bowes Clinic. Q06. Yes more schools will be	Comments noted. NCAAP is a strategic planning document and has little influence over the implementation of the TfL improvements scheme and the associated snagging issues. These are being resolved via the Council's Traffic and Transport department and TfL directly. The need for community and social infrastructure and facilities is agreed and is to be recognised by the Proposed Submission version NCAAP. NCAAP provides clarity on how community and social infrastructure priorities. Including within section 3.2 'What makes for sustainable communities'; NCAAP Policy 4: local

			needed as there is already a shortage of places, without the additional new homes. Q09. How will Barnet and North Middlesex Hospital cope, when Chase Farm closes and we have a massive increase of population in this area? Q10. The North London Assembly Hall provides no community use to any of the local residents. In fact it brings more congestion to the roads on Saturday and Sunday with cars and coaches parked all day long in Powys Lane and surrounding areas. Where are the landscaping and biodiversity proposals being implemented on the A406? Q23. Neighbourhood area stretches too far north of the A406.	Education, NCAAP Policy 5: provision of modern healthcare. NCAAP now provides a clear steer on what is considered 'tall' and where Policy 7: Building heights and development densities. Site specific policies provide detailed guidance on appropriate building heights and densities.
68	Email	Resident	Ritz Parade Plans unclear. Objection to any back land development.	The Council's general policy is a presumption against back land development; however the land to the south of Broomfield School and between the existing properties fronting Bowes Road is highlighted as an exception to this.

APPENDIX 2

Regulation 20

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

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
<p>Whole Plan 01 – English Heritage</p>	<p>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) be used a methodology for identifying site design parameters which respect and enhance the setting of heritage assets.</p>	<p>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 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 Policy 17: Arnos Grove Station, development principles within the policy provide specific guidance with regards to this.</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
Whole 03 – Highways Agency	The Highways Agency (HA) will be 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.	Comments noted
Whole Plan 05 – Southgate District Civic Trust	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
Whole Plan 08 – Canal & Rivers Trust (CRT)	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 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.	Comments are noted and the Action Plan promotes improvements and enhancements to the blue ribbon network specifically within the plan boundary.
Whole Plan 09- Maraine Management Organisation	No comments	Noted
Whole Plan 12 – Transport for	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	Enfield Council acknowledges the land holding interests held by TfL in the Plan area. Specifically, NCAAP has identified Opportunity Site 7 through

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
London (Property)	redevelopment, including along Bowes Road and around Arnos Grove London Underground Station.	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).
Whole Plan 13 – Natural England	<p><u>Local wildlife sites</u></p> <p>If the Area Action Plan covers sites 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.</p>	The area action plan does include some Sites of 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.
Whole Plan 14 – Individual / Resident	<p>Major 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 safety, car parking for new residents and for shops and above all, proper and meaningful consultation.</p> <p>NCAAP has significant weaknesses which need to be urgently addressed before any planning applications for individual sites are considered and certainly before being presented to the Secretary of State.</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 an indicative growth target of 2,000 new homes (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 AAP has now established

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>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 area based on the density matrix adopted by the Mayor's London Plan. The Mayor of London has confirmed that the AAP is in general conformity with the London Plan.</p> <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 growth (and this is further supplemented in the Council's Infrastructure Delivery Plan update June 2013).</p>
<p>Whole Plan 19 – Broomfield Home-owners Residents</p>	<p>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. Therefore it is difficult to understand how the NCAAP will not coordinate changes if NHHT have</p>	<p>The Action Plan identifies 20 Opportunity Sites for development, of these, 8 are either owned or partially owned by Notting Hill Housing Trust as identified in Fig 6 (page 25). Of these, 4 of the 8 sites</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
Association (BHORA)	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>have planning consent and 1 site, Site 13 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 been considered in this regard and in light of emerging North Circular Area Action Plan and Proposed Submission DMD policies.</p>
<p>Whole Plan</p> <p>24 - London Assembly Labour Member Joanne McCarthy</p>	<p>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.</p>	<p>Comments noted.</p> <p>Section 5: Infrastructure Priorities and Delivery Mechanisms 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 the way that important infrastructure will be provided.</p> <p>Policy 4: Local Education and Policy 5: Provision of Modern Health Care (provides a position on meeting</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		key infrastructure issues for the area). Policy 11: Three Neighbourhood Places outlines the key community priorities for each of them.
Whole Plan/ 22 – Great London Authority	The production of an AAP for the 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.	Comments noted.
Plan Procedure 06 – Individual / Resident	<p><u>Community Involvement</u></p> <p>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.</p>	<p>The Council has prepared this Regulation 22 Consultation Statement to support the submission of NCAAP and this sets 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. The Council has also prepared a statement on the Duty to Co-operate.</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</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>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>
<p>Plan Procedure</p> <p>14 – Individual / Resident</p>	<p><u>Community Involvement</u></p> <p>Poor community consultation and planning applications have been determined ahead of the NCAAP being agreed and adopted.</p>	<p>The Council has prepared this Regulation 22 Consultation Statement to support the submission and this sets out the various stages of consultation undertaken, details of the issues and indicates how these have been taken into account in the Plan’s preparation. The Council has also prepared a statement on the Duty to Co-operate.</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. The individual applications of NHHT have been considered in this regard and in</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
<p>Section 1.1 19 –Broomfield Home-owners Resident Association (BHORA)</p>	<p>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.</p> <p>This document notes some of BHORA’s concerns and suggestions however it fails to address them.</p>	<p>light of emerging North Circular Area Action Plan.</p> <p>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 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.</p> <p>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 out the methods used for consultation at each stage of the Plan’s preparation.</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>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, road capacity, and environment are addressed through the policies of the Plan. The representation does not state which issues have not been addressed.</p>
<p>Section 1.1 23 – Environment Agency</p>	<p>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.</p>	<p>Agreed to a minor change to acknowledge Bounds Green Brook in the second to last paragraph on page 9.</p>
<p>Section 1.2</p>	<p>Housing-led regeneration is unimaginative. This is not endorsed by</p>	<p>The North Circular Area Action Plan seeks to</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
<p>19 –Broomfield Home-owners Resident Association (BHORA)</p>	<p>community consultation. The community has requested better 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. References to supporting the need for retirement apartments, care homes etc to accommodate the aging population should be included 22.4% of Bowes workforce is long-term unemployed. This document fails to show how ‘housing-led regeneration’ will create local, well paid, meaningful work. Part of the Ladderswood Estate, industrial estate that provides work is to be demolished, making way for more housing be built on it. This section of the NCAAP proposed draft submission gives a fair assessment of the area.</p>	<p>positively contribute towards implementing the vision and 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 established the housing led regeneration strategy for this area and set an indicative growth target of 2,000 new homes. This will help to regenerate the deprived and blighted parts of the NCAAP area and make use of previously developed and land. There would also be additional benefits, as any refurbished and redeveloped buildings would be constructed to higher environmental standards, the redevelopment of the blighted parts of the NCAAP corridor and some development would feature 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</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>existing residents, acting as a buffer.</p> <p>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 Avenue Industrial Estate continue to be protected. The three Neighbourhood Places also seek to expand employment opportunities.</p>
<p>Section 1.2</p> <p>15 – North London Waste Authority (NLWA)</p>	<p>3 points raised:</p> <ol style="list-style-type: none"> 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 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. 	<p>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 status of both.</p>
<p>Section 2</p> <p>19 –Broomfield Home-owners Resident</p>	<p>2.0 The North Circular Vision and Spatial Strategy</p> <p>Over-development does not create sustainable communities. Designs NHHT have presented are not supported.</p>	<p>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</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
Association (BHORA)		the Action Plan 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, vital and interesting area, with lively and active neighbourhood places.
2.2 Objective 06 Individual	<p>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 businesses and the staff in accordance with the aims set out on page 30.</p> <p>The NCAAP is principally about increasing housing.</p>	The Council prepared 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 and to better understand the issues. The Study assessed both Locally Significant Industrial Sites in the AAP area and for Regents Avenue and the remainder of New Southgate Industrial Estate continues to support their designations. Outside of the industrial areas, job creation will come forward in Neighbourhood Places and through the mixed use opportunity sites. The corridor is predominantly residential nature, however through Policy 3: Creating and Protecting Local Jobs in the North Circular Area the issue is

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		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 growth on residential amenity whilst seeking to enhance the local economic profile of the area.
<p>Section 2.2</p> <p>19 –Broomfield Home-owners Resident Association (BHORA)</p>	<p>2.2 Objectives</p> <p>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.</p>	<p>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.</p>
<p>Policy 1 North Circular Area Action Plan Area Key elements of the spatial framework</p> <p>19 –Broomfield Home-</p>	<p>Question how new space can be created with so much planned development. This document fails to detail what is meant by 'high quality development'.</p>	<p>Policy 6: 'High Quality Design or New Development' 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</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
owners Resident Association (BHORA)		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.
Section 3.1 19 –Broomfield Home-owners Resident Association (BHORA)	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 has a blend of uses including homes, shops, schools, local health facilities, employment opportunities, local libraries, leisure and open spaces. This mix creates a diverse, vital and interesting area, with lively and active neighbourhood places.
Policy 2 New and Refurbished Homes 14 – Individual/Resident	The development of some sites involve erection of 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’ 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 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.
Figure 6 Site name,	Recommend the Description of Opportunity for sites 2, 3 and 4 in Figure 6	Text amended within Figure 6 to further clarify the

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
<p>description and ownership.</p> <p>18 - Savills on behalf of Legal & General and National Grid</p>	<p>should be reworded to read, “Mixed use high density development including leisure and retail, housing, and community facilities”.</p>	<p>mix of land uses proposed for the three sites.</p>
<p>Policy 2 New and Refurbished Home</p> <p>24 - London Assembly Labour Member Joanne McCarthy</p>	<p>London needs more housing however, this area is already densely populated and lacks green space and facilities, such as adequate health and school provision.</p> <p>Recent planning application submitted by Notting Hill Housing Trust considered to be “cramming” many people into new flats which will add further unbearable pressure on local services.</p>	<p>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 for each of them. Enhanced community / leisure provision is designated for both library sites within the Plan area, in accordance with the adopted New Southgate Masterplan and Southgate Town Hall Planning Brief.</p> <p>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.</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
<p>Policy 3 Creating and protecting local jobs in the North Circular</p> <p>19 –Broomfield Home-owners Resident Association (BHORA)</p>	<p>The Council has already accepted the partial loss of New Southgate Industrial Estates, failing to protect local jobs in the area.</p>	<p>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 Avenue Industrial Estate continue to be protected. The three Neighbourhood Places also seek to expand employment opportunities.</p>
<p>Policy 3 Creating and protecting local jobs in the North Circular</p> <p>24 - London Assembly Labour Member Joanne McCarthy</p>	<p>The opportunity to create jobs locally is important; there is little 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 of this scheme.</p> <p>Has the Borough set targets regarding local labour that will be used in the construction of these new developments?</p>	<p>The Action Plan includes policies that would seek to 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) 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 remaining portion of New Southgate Industrial Estate by the</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>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>
<p>Section 3.3 Community Infrastructure</p> <p>19 –Broomfield Home-owners Resident Association (BHORA)</p>	<p>Respondent questions whether S106 contributions will be ring-fenced to the NCAAP area.</p>	<p>Section 5: Infrastructure Priorities and Delivery Mechanisms explains our approach to the 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 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. The policy also lists infrastructure priorities.</p>
<p>Section 3.3 Community Infrastructure</p> <p>20 – Barnet Council</p>	<p>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.</p> <p>Note that the expansion of local education will specifically be provided at</p>	<p>The comments from the adjoining authority are noted as being ongoing cross-borough issues. Equally, the Plan area, bounded by Haringey and Barnet it is also possible that the regeneration of the area could also attract pupils from Haringey and Barnet, increasing demand in Enfield in the</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
	<p>Garfield Primary School, concerned that the submission draft of the NCAAP is still exploring the feasibility of this expansion at this late stage in the document's production.</p>	<p>immediate area and beyond.</p> <p>The Plan reflects the current situation with regards to the 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.</p>
<p>Section 3.3 Community Infrastructure</p> <p>16 – Notting Hill Housing Trust</p>	<p>Page 30, Section 3.3 refers in the third bullet point to a minimum of 600 sqm of new community facilities to be delivered on the ground floor of new development at the Wilmer Way / Bowes Road junction. In fact, 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>The figure of 600 - 1200sqm at the Wilmer Way / Bowes Road junction, Site 11, 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 ground and first floor accommodation. Policy 22 seeks to secure a reasonable proportion of the site for community</p>

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	<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 boundary with Broomfield School, and therefore Point 1 should be updated.</p>	<p>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 the approved scheme.</p>
<p>Section 3.3 Community Infrastructure</p> <p>24 - London Assembly Labour Member Joanne McCarthy</p>	<p>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.</p>	<p>The Council continues to work closely with all healthcare providers to understand and support local health care needs of residents and physical provision across the local area.</p> <p>Additional healthcare provision is supported and identified on several 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).</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		Additionally health services would also be supported within the Bowes Road and Green Lanes Neighbourhood Places.
Policy 4 Local Education 06 – Individual / Resident	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 schools places, and this will continue to be kept under review through the relevant Council programmes and strategies.
Policy 4 Local Education 19 –Broomfield Home-owners Resident Association (BHORA)	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.	The need for two additional forms of entry primary school places is identified early on page 11, 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 continuing to progress. The respondent is referring to earlier proposals for Garfield School which have been superseded.
Policy 4 Local Education 14 – Individual/ Resident	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.	The pressure for school places is not just a local issue for the housing growth planned for the NCAAP area, but is also a borough and London-wide issue related to population projections and the rise in birth rates and migration.

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>The need for two additional forms of entry primary school places is identified early on page 11, and references to additional provision is 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>
<p>Policy 4 Local Education</p> <p>24 - London Assembly Labour Member Joanne McCarthy</p>	<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 primary school places is not just a local issue for the housing growth planned for 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>Specifically for this area, the need for two additional forms of entry primary school places is identified early on page11, and references to additional provision are made throughout the document, in particular at Policy 4: Education.</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>The Action Plan reflects the most 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>
<p>Policy 5 Provision of Modern Healthcare</p> <p>06 – Individual / Resident</p>	<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> <p>Policy 5: Provision of Modern Health Care provides a position on meeting the physical infrastructure issues for the area. Policy 11; Three Neighbourhood Places outlines the key community priorities for each. 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>

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Policy 5 Provision of Modern Healthcare 19 –Broomfield Home-owners Resident Association (BHORA)	Walk-in Centre at Coppice Wood Lodge supported.	Comments noted
Policy 5 Provision of Modern Healthcare 14 – Individual /Resident	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 key infrastructure issues for the area). NCAAP Policy 11: Three Neighbourhood Places outlines the key community priorities for each of them. Additional healthcare provision is supported and identified on 3 Opportunity Sites, Coppicewood Lodge, (site 6), Southgate Town Hall (site 14) and through the expansion of provision at Arnos Grove Medical centre site / Bowes Library (site 8).
Section 3.4 A design-led approach 19 –Broomfield Home-owners Resident Association (BHORA)	The area has been ignored for many 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.	The detailed comments of the representation have been noted and relate specifically to the 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

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		Development is relevant to not only new development but also public realm improvements.
<p>Policy 7 Building Heights and Development Densities</p> <p>06 – Individual /Resident</p>	<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. (Note1). PTAL’s provide an indication of transport accessibility and by 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 this accords with The London Plan. Yet, on both Sites 11 and 13 backland development is proposed with no credible justification.</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 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.</p> <p>PTAL data is supplied by 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 a site’s accessibility to facilities and services, the impact on existing development, and the needs of new development are equally considered. Further guidance on this is detailed in the policies of the Proposed Submission</p>

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		<p>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.</p> <p>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 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>
Policy 7 Building	In an already overpopulated area, some of the proposed developments	Accommodating housing and population growth is

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<p>Heights and Development Densities</p> <p>14 – Individual/Resident</p>	<p>will mean an increase of population of anywhere between 100% - 250%. This increase will automatically have an impact on provision of primary and secondary 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?</p>	<p>being addressed borough-wide. Enfield’s adopted Core Strategy (2010) sets out the borough-wide spatial strategy. In particular the regeneration priorities including: securing new housing, jobs and facilities for Enfield’s growing population and meeting local development needs in different areas of Enfield. Enfield’s overall housing growth target is 11000 new homes up to 2026, and sets a target of 2000 new homes for the North Circular Regeneration Area.</p>
<p>Policy 7 Building Heights and Development Densities</p> <p>24 - London Assembly Labour Member Joanne McCarthy</p>	<p>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 the area are predominantly two-storey, suburban dwellings will detract from this residential suburban feel.</p>	<p>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 clearly states that 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</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>Neighbourhood Places and identified points of transition).</p> <p>The appropriateness of taller 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.</p>
<p>Section 3.3 Connecting the North Circular</p> <p>20 – Barnet Council</p>	<p>NCAAP abandons 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 Core Strategy can deliver strategic growth in this plan period despite the significant capacity constraints on this stretch of the North Circular Barnet 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>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.</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</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>Notting Hill Housing Trust. Ultimately this act addressed 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 the Council to provide an update on the local planning position on a key issue that has played a major contribution to the area’s blighted state.</p> <p>Enfield 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>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
<p>Section 3.3 Connecting the North Circular</p> <p>07 – Federation of Enfield Residents and Allied Associations (FERAA)</p>	<p>Object to removal of historical 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>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 now. The Highways Agency 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.</p> <p>Since the adoption of the Core Strategy, in 2010 TfL transferred the majority of land safeguarded land to Notting Hill Housing Trust, this addressed the uncertainty over future proposals. NHHT acquired 400 property interests from Transport for London in April 2010. The properties had been purchased by the highways authority over the last 40 years for proposed road widening and the area has suffered from considerable blight with derelict and squatted properties.</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>The NCAAP is the appropriate opportunity for the Council to provide an update on the local planning position on an issue that has played a major contribution to the area’s blight.</p> <p>Enfield 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 however that 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>
<p>Policy 8 Transport and movement in the NCAAP Area</p> <p>06 – Individual / Resident</p>	<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 pedestrians/children another</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 real concern to the local community. The Council, in its capacity is</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
	<p>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>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 .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 possibly in reference to the parking bays lost to the implementation of TfL’s safety and environmental road improvement scheme at Ritz Parade. Policy 23: Ritz Parade supports creating additional parking for local businesses.</p>
<p>Policy 8 Transport and movement in the NCAAP Area/14/006</p>	<p>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</p>	<p>Section 3.5: Connecting the North Circular makes reference to TfL’s recently completed safety and environmental road improvement scheme. The</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
14 – Individual / Resident	<p>scheme.</p> <p>Car Parking Allocation of car parking for the new housing falls significantly below GLA requirements.</p>	<p>Council acknowledges the implemented scheme has raised a number of ‘snagging’ issues of concern to the local community. The Council, in its capacity is raising the issues directly with TfL. The issue sits 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>
<p>Policy 10 Open Spaces, Waterways and the Blue Ribbon Network/ 06 – Individual / Resident</p>	<p>Parks: The NCAAP highlights the lack of open spaces in certain areas, but makes no recommendation for better use of the extra open space, especially Arnos Park.</p> <p>Water Ways: The report says (on page 85) that the New River is a valuable local amenity and recommends that 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>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). 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</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		<p>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>Policy 10 Open Spaces, Waterways and the Blue Ribbon Network</p> <p>24 - London Assembly Labour Member Joanne McCarthy</p>	<p>There must be adequate play space which children can walk to without crossing the busy A406.</p>	<p>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 24 (Bowes Road Site 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: (Children’s Play Space).</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
<p>Section 3.6 Greening the North Circular</p> <p>19 –Broomfield Home-owners Resident Association (BHORA)</p>	<p>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’.</p>	<p>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 Spaces) sets out the Council’s approach on protecting and enhancing existing open space.</p>
<p>Section 3.6 Greening the North Circular/ Climate Change</p> <p>18 - Savills on behalf of Legal & General/National Grid</p>	<p>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 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.</p>	<p>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 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</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
		detailed policy.
<p>Section 3.6 Greening the North Circular/ Climate Change</p> <p>24 - London Assembly Labour Member Joanne McCarthy</p>	<p>A real opportunity missed to add significant greening to this corridor during the recent widening of the A406. However, if development is to take pace the environmental impact on and look of the area must be given high importance.</p>	<p>The recent road widening referred to by the representation relates to TfL’s recently implemented Safety & Environmental Improvement Scheme. Some improvements to landscaping and streetscape have been introduced. The NCAAP promotes further environmental improvements to be secured through development opportunities.</p> <p>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 open space alongside waterways.</p> <p>More generally, the NCAAP’s policies would have a significant positive impact cumulatively, 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.</p>

Part of Plan	Comments on the Proposed Submission NCAAP	LBE Response
<p>Section 4.4 Public Realm and open space (Fig 160/23/002)</p> <p>23 – Environment Agency</p>	<p>Failure to mention Bounds Green Brook within the context of opportunities for improvements to open spaces next to the brook.</p>	<p>Amendment made via PPMCs to recognise Bounds Green Brook.</p>
<p>Policy 12 Arnos Grove / New Southgate Neighbourhood place /</p> <p>10 – DHA Planning on behalf of New Ladderswood LLP</p>	<p>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, 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.</p>	<p>The remaining element of New Southgate Industrial Estate continues to be designated a Local Strategic Industrial Site (LSIS). The NCAAP is not 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, LSIS 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 Policy 15: (Locally Significant Industrial Sites).</p>

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		<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>
<p>Figures 13,14,15,16,17 & 18</p> <p>10 –DHA Planning on behalf of New Ladderswood LLP</p>	<p>Amend to include the New Southgate Industrial Estate as an opportunity site.</p>	<p>As set out in Enfield’s response to Rep No. 53 above, the AAP does not propose any change to the employment designation of this site.</p>
<p>Policy 13 Ladderswood Estate/ 10/003</p> <p>10 –DHA Planning on</p>	<p>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).</p>	<p>Aligning Policy 13 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</p>

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behalf of New Ladderswood LLP		has not yet 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 “ <i>approximately 400 dwellings.</i> ”
New Policy 13a 10 –DHA Planning on behalf of New Ladderswood LLP	<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 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</i> 	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.

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	<p><i>principles of the provision approved as part of any planning permission for the Ladderswood Estate;</i></p> <p>3. Secure safe access via the Ladderswood Estate development and enhance pedestrian connectivity and legibility throughout the area;</p> <p>4. Preserve and enhance the landscape and ecological value of Bounds Green 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>	
<p>Policy 14 Western Gateway</p> <p>23 - Environment Agency</p>	<p>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.</p>	<p>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.</p>
<p>Fig. 18 Site Proposals</p> <p>18 - Savills on behalf of Legal & General and</p>	<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</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</p>

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National Grid	floorspace to ensure the scheme is financially viable and deliverable.	<p>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: (Western Gateway) allows for <u>approximately</u> 3,500sqm. This figure is considered to provide a degree of balance between the mix of land uses promoted for sites 2, 3 and 4.</p>
Policy 14 Western Gateway Site 18 - Savills on behalf of Legal & General/National Grid	<p>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 below:</p> <ul style="list-style-type: none"> - 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 line; <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</p>	<p>Support for a mixed use scheme is noted. The issues set out concerning viability would need to be evidenced through at a more detailed planning proposal level. No detailed scheme has been submitted to date that would provide the detail required to 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. The Council questions the representor's argument that residential values are not significant in this area. A number of residentialled schemes are being pursued along the A406 corridor that contradicts this statement.</p>

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	<p>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 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>The wording of part 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 point 6 of Policy 14 that now seeks to offer a flexible housing target for the site and now gives a range between 200 – 360 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>The sites are in different ownerships and leasehold arrangements that logically splits the site into three parts. A phased approach has been taken to allow for maximum flexibility in the delivery of the Western Gateway site.</p>

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		The Council will continue to discuss the deliverability and viability of any proposed developments with the landowners.
Policy 15 new Southgate Station (Site 02 – Arriva Buses	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.
Policy 17 Arnos Grove Station (Site 7) 12 – Transport for London (property)	<p>Site 7 Arnos Grove Station site</p> <p>TfL Property supports ‘in principle’ the identification of the land adjacent to Arnos Grove Station as an Opportunity Site for mixed-use development including residential development referenced Policy 17 – Arnos Grove Station, Site 7 in the AAP.</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, as is established in Policy 17. 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</p>	The two of three sites covered by Policy 17: (Arnos Grove Station) are currently surface commuter parks and have 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 ‘ on the assumption ’ 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

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	<p>Plan. Do not support the assumption that a decked structure would be provided on eastern parcel of land to allow for the 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>degree of flexibility given the uncertainty at this stage how TfL intend to take forward these 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.</p>
<p>Policy 19 Bowes Neighbourhood Place</p> <p>23 – Environment Agency</p>	<p>Environment Agency support element 4 but do not feel the New River should be given greater priority over Pymmes Brook.</p>	<p>Agree both corridors are equally important, amendment made via PPMC.</p>
<p>Fig 21</p> <p>23 – Environment Agency</p>	<p>An 'improvement opportunity' is identified at (D), but not explained in accompanying text.</p>	<p>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.</p>
<p>Policy 21 Telford Road</p>	<p>The PTAL score falls within the 4-6 range. The site covers 0.35 hectares,</p>	<p>Making the most efficient and best use of Enfield's</p>

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<p>/Bowes Road Corner (Site 10)</p> <p>06 – Individual / Resident</p>	<p>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%.</p>	<p>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 (2011). Fig 8 (page 28 - 29) provides a capacity schedule for Opportunity Sites based on the density matrix provided by the London Plan.</p> <p>The Development Management case officer will apply the adopted standards when assessing the merits of individual planning scheme.</p> <p>It is unclear how the respondent has calculated population density growth for Southgate Green ward. Enfield’s adopted Core Strategy envisaged 2000 new homes in the area by 2026 and recognised this would lead to a population growth of the NCAAP area of some 3,700. Using an average of 2.5 persons per new home.</p>
<p>Policy 21 Telford Road /Bowes Road Corner (Site 10)</p>	<p>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 maximum height of 6 storeys so this policy should be amended to reflect the current position.</p>	<p>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 granted planning scheme has yet to be implemented, therefore should</p>

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		a revised or another scheme come forward Policy 21 would still remain the starting policy position .
Policy 21, 22 and 24 12 TfL	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.
Policy 22 Bowes Road Wilmer Way (Site 11) 06 Individual /Resident	<p>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 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>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).</p> <p>It is unclear how the respondent has calculated population density growth for Southgate Green ward. Enfield’s adopted Core Strategy envisaged 2000 new homes in the area by 2026 and recognised this would lead to a population growth of the NCAAP</p>

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		area of some 3,700. Using an average of 2.5 persons per new home.
<p>Policy 23 Ritz Parade</p> <p>16- Notting Hill Housing Trust</p>	<p>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.</p> <p>Notting Hill however support the comprehensive development of Ritz Parade, including the central 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 any</p>	<p>Support noted. The Plan continues to provide a level of flexibility and scope as to how the regeneration of Ritz Parade can be facilitated.</p> <p>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).</p> <p>It is appropriate for the Plan to guide investment and provide a level of expectation without being too prescriptive.</p> <p>A capacity assumption for all 20 Opportunity Sites within NCAAP has been documented in Figure 8 (page 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</p>

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	<p>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.</p>	<p>additional new homes is based on this.</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 way in which to deal with this will be through a planning / development brief.</p>
<p>Policy 23 Ritz Parade 11 – Ritz Parade Traders Association</p>	<p>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.</p> <p>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.</p> <p>The plan quite rightly identifies the 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</p>	<p>Comments of support for the policy approach is noted and welcomed.</p> <p>Policy 23 responds 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 concerned about retaining it.</p> <p>Extending the boundary of Bowes Large Local Centre (page 46-47) to include the vacant Esso garage land to the west and land immediately to the west of the central building creates more space and greater</p>

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	<p>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 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 exiting 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>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 however recognise that comprehensive development may also a viable option, particularly if additional community facilities and services are sought to be secured through achieving higher density than currently exists. Comprehensive development may not necessarily be longer term, the aspirations to deliver the site have been acknowledged by the key landowner, Notting Hill Housing Trust.</p>
<p>Policy 24 Bowes Road Sites (Site 13 Powys Lane to Broomfield Road</p> <p>06 – Individual / Resident</p>	<p>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</p>	<p>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). The Development Management case officer will apply the adopted standards when assessing</p>

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	the population in the ward will rise by about 3,000 people, which is close on 25%.	individual planning schemes. It is unclear how the respondent has calculated population density growth for Southgate Green ward. Enfield's adopted Core Strategy envisaged 2000 new homes in the area by 2026 and recognised this would lead to a population growth of the NCAAP area of some 3,700. Using an average of 2.5 persons per new home.
Policy 24 Bowes Road Sites (Site 13 Powys Lane to Broomfield Road) 17 - Hammond of Hendon Ltd	Specifically concerned about the site East of Powys Lane, noted in your draft as "a large site presents major opportunity for new residential development and 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.
Policy 25 Green Lanes Neighbourhood 23 – Environment Agency	Bullet point 4: Do not feel the New River should be given priority over Pymmes Brook as suggested.	Bullet point 4 specifically 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.
Policy 27 Green Lane	Given parts of the site fall within flood zone 2/3 the Policy should indicate	Agreed, amendment made via PPMC 59.

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Site 23 – Environment Agency	that new development should be steered to area of lowest flood risk on the site.	
Policy 28 Green lanes/A406 Junction North (Sites 16 and 17) 02 – Arriva Buses	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. If the Council has other ideas, these will need to be discussed with operator.	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.
Policy 28 Green lanes/A406 Junction North (Sites 16 & 18) 16- Notting Hill Housing Trust	Notting Hill have an interest in both 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 – and 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 out in the AAP document; one that is a landmark for the area.	It is appropriate for the Acton Plan to provide clear design principles for each of the Opportunity Sites and guide investment without being overly prescriptive. Through its evolution, the Plan has considered the development approach of Opportunity 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

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	<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 reconciling various existing land interests that will need to be resolved prior to committing to a defined vision.</p>	<p>Palmers Green 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.</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 Document, adopted London Plan and NPPF.</p>
<p>Section 5.3 Key Infrastructure 20 – Thames Water</p>	<p>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 required, up to three years lead in time will be necessary. Given the above water supply and drainage infrastructure comments, TW</p>	<p>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.</p>

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	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.	

