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Miss Neeru Kareer  
Enfield North Circular Area Action  
Plan  
The Planning Policy Team  
London Borough of Enfield  
Civic Centre  
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Our Ref: PINS/Q5300/429

Date: 14 November 2013

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Dear Miss Kareer,

## **EXAMINATION INTO THE SOUNDNESS OF ENFIELD COUNCIL – ENFIELD NORTH CIRCULAR AREA ACTION PLAN**

I have now had the opportunity to give consideration to the NCAAP and have some preliminary queries to which I would appreciate the Council's response.

Firstly, para 15 of the NPPF indicates that all Local Plans should be based on and reflect the presumption in favour of sustainable development which lies at the heart of national policy and they should contain clear policies that will guide how the presumption is to be applied locally. The NCAAP does not include such a policy and so to be found sound there is a need for some modification, (see the model policy published on the Planning Portal website) in order to be consistent with national policy. Although it may be argued that the model policy is not necessary in an Area Action Plan for a relatively small area, the approach to development proposals and decision making set out in the model policy does not appear elsewhere in the Plan and the Council's Core Strategy, adopted prior to publication of the NPPF, does not reflect the presumption. (Elsewhere – eg: Bracknell Forest SALP, Ashford Chilmington Green AAP – councils have accepted the Inspector's recommendation to incorporate an appropriate policy based on the model).

Secondly, Core Strategy Policy 45 gives prominence to the New Southgate Place Shaping Priority Area, complete with a boundary, Map 9.9. The Masterplan (NB: referred to as 'masterpan' in the Arnos Grove/New Southgate paragraph on p 47 of NCAAP) does reflect the CS approach, although the boundary is slightly different – omitting properties to the north-east of the junction between Bowes Road and Waterfall Road. I cannot find any cross-reference to the Place Shaping Priority Area in the NCAAP. This appears to be an omission which may require attention.

Thirdly, the policy stance on Broomfield Secondary School appears ambivalent. CS Policy 8 refers to an aspiration for an all age school on the existing site with details to be included in the NCAAP (reflected also in CS Policy 44). Policy 4 in the NCAAP refers to support for additional pupil places at Broomfield Secondary School whilst p69 simply states that permanent expansion to admit more pupils "*..is being considered*". The issue is not referred to in the analysis of secondary schools in the Infrastructure Delivery Plan Review (EBD-09) and is not mentioned in the schedule Table B2. The NCAAP proposes a net increase of around 1,330 dwellings which suggests a significant increase in school age children and concerns with secondary education are raised by at least 2 representations. I appreciate the Plan cannot make policy regarding school provision but the necessary infrastructure to support the residential growth should be given proper consideration in the NCAAP.

I assume the Council will be providing a detailed response to the concerns raised by dha planning regarding the New Southgate Industrial Estate and its proposed new Policy 13a.

Yours sincerely

*Patrick T Whitehead*

INSPECTOR