

North Circular Area Action Plan Proposed Submission Draft Part of Enfield's Local Plan. February 2013.

Response from Broomfield Home-owners and Residents Association (BHORA)

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1.1 What is this document for?

independently. The NCAAP will play an important role in coordinating this period of significant change and investment.

Notting Hill Housing Trust (NHHT) will have obtained planning approval for all the developments outlined in their 'vision' document before the NCAAP is ratified. Therefore the NCAAP

will not coordinate changes; NHHT will have built houses and flats on every patch of land it owns along the A406. There will be no space for community facilities, health, education etc...

When questioned at an area forum about the density of the NHHT proposals (Fox Pub 2012) Cllr Del Goddard assured the meeting that he had held a robust meeting with NHHT dealing with this issue. Many of us understood this to mean that he had convinced them to withhold planning applications until the NCAAP had been ratified, the document would then guide the NHHT scheme for our area. However NHHT have continued to submit large housing schemes, out of proportion and style with the surrounding area (6 storey flats in a 2 storey area) and been granted planning permission.

How did we reach this point?

Enfield's South West Area Partnership. This document states that local residents are involved with and have been consulted through SWAP. BHORA only found out about this group in 2013. LBE know that BHORA exists, we have responded to previous AAP documents but at no point have we been formally invited to SWAP meetings. We are now aware of these meetings but note that they take place 4-6pm, this means are pool of representatives are limited to those who don't work. We question whether LBE really does want local involvement in any consultation process.

How have we worked with the community?

We appreciate that this document notes some of our concerns and suggestions however it fails to address them.

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How have we worked with our neighbours and partners?

'The South West Area Partnership has been especially instrumental, bringing together and co-ordinating local people...' We have looked at minutes available from SWAP meetings and there are no local people included in the attendance lists.

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1.2 Context. The Enfield Plan.

Housing led regeneration sounds incredibly unimaginative. Through all the consultation meetings we have attended we have not heard one member of the public request 'housing led regeneration' however we

have heard people request better shops, improved health facilities, leisure facilities, longer library opening hours at Bowes Rd library, more school places, fly tip to be removed, streets to be swept regularly. We understand that something has to happen to encourage the private sector to invest in the area but we question whether building small cheap flats many of which will be purchased through 'buy to let' will encourage private investment. The majority of requests, ie leisure, schools etc are in the gift of the local authority and not the private sector.

When putting our response together we were notified that the plan to increase the size of Garfield School to accommodate new families on the Ladderswood Estate had been knocked back by the governors. There is already massive pressure on local schools, LBE are not addressing the issue.

An all age school on the site of Broomfield School. We have not consulted with our membership regarding a through school initiative but we believe that through S106 money brought to the area through all the new building works, money would be available for new school buildings.

Will the council guarantee that S106 money associated with the A406 new build new build will be spent in this AAP zone?

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Socio-Economic Context

This document high-lights Bowes Ward as having higher than borough average 25-64 year olds. Where are the references in this document supporting the need for retirement apartments, care homes, etc to accommodate the aging population?

22.4% of Bowes workforce long-term unemployed. This document fails to show how 'housing led regeneration' will create local, well paid, meaningful work. Part of the industrial estate that provides work is to be demolished, making way for more housing built on it, re Ladderswood Estate.

This section of the NCAAP proposed draft submission gives a fair assessment of the area.

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2.0 The North Circular Vision and Spatial Strategy

2.1 Introduction

all users and modes of transport. These local communities will be serviced by a network of vibrant local commercial centres and community facilities.

The North Circular corridor will be an exemplar of how sustainable communities can live alongside one of London's principal distributor roads with the benefit of carefully designed new development and environmental measures.

We very much look forward to using these vibrant centres.

Cramming as so many people in to flats and 'mews' does not create sustainable communities. Designs NHHT have presented so far are carefully designed to fit in with a very tight budget to bring about the best profit margin. The

shrubs planted along A406 to date do nothing to encourage wildlife and improve the natural world around us.

These neighbourhoods will be desirable places to live, will support the general health and well being of their residents and provide existing and

new communities with high quality new and improved housing, supported by local services and jobs, improved transport and access to high quality open spaces.

This is aspirational, we see no glimmer of it at present with NHHT building flats on every pocket of vacant land.

2.2 Objectives

Optimise the provision of decent homes for sale or rent at a price local people can afford and meets local need.

We 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.

Identify and promote specific opportunities for new development that will contribute significantly to the strategic housing targets outlined in the Council's Core Strategy.

Does this mean anything at all?

Provide an attractive and safe environment, well integrated with its historic environment, encompassing the highest quality sustainable urban design, architecture and open spaces.

This is exactly what local people are asking for.

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Policy 1 North Circular Area Action Plan Area

Key elements of the special framework

We appreciate this document understanding the need for space in an area already densely populated. We question how new space can be created when NHHT plan to build on every plot they own.

improvements and high quality new developments along the corridor itself;

This document fails to detail what is meant by 'high quality development'. What we do know is that NHHT need to make a

considerable profit to cover the refurbishment costs already undertaken along A406. Profit will not mean any type of 'high quality' it will mean stack it high and sell it quick! The architect has already said he is working to a tight budget.

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3. Our Approach-Building for sustainable neighbourhoods

Our area is in great need of:

Improved shopping facilities

Employment

Leisure facilities

We would suggest that Bowes Road Library be extended into the building below plus increased opening hours. With 1000's of new people moving into the area our library service must be increased. Enfield Town has 2 libraries whilst Bowes Rd library is rarely open. We oppose any plans to build on the small plot of land in front of the library.

This document suggests that sustainable neighbourhoods are brought about through cramming as many people into the area as possible. No piece of research supports this, sustainable neighbourhoods are brought about through listening too and working with those who live and work in an area, providing local amenities and services.

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Policy 3 Creating and protecting local jobs in the North Circular Area

LBE has already moved employers off a local industrial site to build more homes (Ladderswood Estate). LBE has already failed to protect local jobs in the area. LBE should start to relocate council departments to the NCR new build office space.

3.3 Community Infrastructure

In view of the significant levels of housing development being proposed, it is a particular priority of this AAP to help ensure that appropriate contributions are made to the provision of community infrastructure as decisions are made on individual planning applications.

Is this a reference to S106 money? What guarantees can the council give that this money will be spent ONLY in the NCAAP zone?

We need to move on from 'suggesting' the need for community infrastructure and start to look at sites and options and actually get things moving. We have waited years for an improved area. It appears that nothing will happen until NHHT have finished building on every site.

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Policy 4 Local Education

LBE is showing no commitment to providing adequate schooling for local children.

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Policy 5 Provision of modern health care facilities

Walk-in Centre at Coppice Wood Lodge. A brilliant idea, let's do it.

an ethnically diverse population. The Council is keen to work with GP practices, clinicians,

Don't be 'keen', get on with it!

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3.4 A design-led approach

As we are all aware, our area has been ignored for many years for many reasons. To talk about a 'design-led approach' sounds as if someone cares about how our area looks but if we consider recent additions to our area we can see that this is far from the case. (a) the new bridge – too large and very ugly, (b) whisper tarmac was promised for A406 but never happened (c) green tarmac for the cycle lanes never happened, this would give some relief to the dominating black tarmac of A406, pavement and cycle lane (d) curbside planting of one type of shrub only, that thrives in only some parts, is never replaced, never has rubbish taken out of it and gives a harsh look to the area.

existing communities of the road corridor. Away from these appropriate locations, new development should not exceed the predominant building height in the local vicinity, and in most cases this will be two storeys.

LBE has already granted planning permission for 6 storey buildings along the A406 which we opposed.

generally characterised by low rise residential development. Core Policy 4 highlights the importance of ensuring new housing is of a sufficiently high standard of design. Responding positively to the context of a site is a key issue in this regard. Further guidance is provided under

Can a small committee of local residents work with the architect to try and make sure there are some standards of design adhered to? A committee the public is actually told about unlike SWAP.

The development of back gardens and backland areas has been raised as an issue during the preparation of the AAP. The Council's position on back garden and backland development is set out in Draft DMD Policy 11 Development of Garden Land which makes clear the Council's presumption against new residential development on garden land.

For many years local people have complained about how LBE ignore the wishes of people living in this area. And here is the proof. We say that we do not agree with back garden development and the council agree with us until a planning application arrives for such a development and then the council create an exception to it's own policy, the exception isn't in Winchmore Hill, Cockfosters, Chase but a small stretch just of A406. Really not sure what we are meant to say here.

An exception to this policy is the land between the southern boundary of Broomfield Secondary School and Bowes Road. Garages were previously accessed along an informal lane but in view of the character of the local area and the relationship between the site and the secondary school, development of

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3.6 Greening the North Circular

Policy 9.

buildings from less polluted sides of the development. Landscape and biodiversity proposals will also play an important role in the mitigation of pollution.

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'. Not only will appropriate soft landscaping aid pollution management but it will also have a positive impact on how people view the area as they travel along A406 and help local people treat the area with care and consideration.

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Policy 10 Open spaces, waterways and the blue ribbon network.

Climate change and renewable energy

Surely it's time LBE made it a requirement that all new build should include PV solar panels. This would reduce energy costs for those living in the home and pump un-used energy into the national grid.

We are disappointed that the NHHT refurbishments along A406 did not include PV solar panels. For those living in social housing a reduction in fuel bills is a massive help towards day to day budgeting, plus unused energy gets pumped back into the national grid.

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Policy 11. Three neighbourhood places.

The patterns of movement and retail behaviour of local residents is highly complex, being influenced heavily by the attraction of larger surrounding retail centres of Palmers Green, Wood Green and Brent Cross and Central London beyond. Notwithstanding this, smaller centres

Wood Green shopping centre is run down with few quality shops. Palmers Green is inaccessible (unless using a car) to those living south of A406, Brent Cross is a long way on a bus for a pint of milk, unless using a car, Central London???

All local people want are quality shops within walking distance, all part of a sustainable neighbourhood!
A proper supermarket (not Tesco express, Sainsbury's local etc) and an out-door market would be a huge step forward for the local community.

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4.4 Neighbourhood place 1.

Opportunity Sites

With reference to the New Southgate Masterplan. If this plan were implemented then any job opportunities that exist at the moment (Tops Tiles, Homebase etc) would be done away with, the associated buildings demolished and MORE flats built on the sites. Where is the LBE commitment to protecting and creating local jobs for a sustainable neighbourhood?

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Public realm and open spaces

With reference to (H) High Road open space we are aware that a full and proper consultation did not take place. Children from Bowes Road School were consulted on what should happen to this site, a site they never visit. Residents living on the edge of the site, those most effected by the development of the open space, were not consulted. It would appear that the council consults with those it thinks will give them the answer they want.

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POLICY 14 WESTERN GATEWAY (SITES NUMBER 2, 3 AND 4)

Redevelopment of the retail warehousing and gasholder site provides a major opportunity to deliver a landmark

development at this key gateway to the Borough. Taking full account of the guidance contained within the New Southgate Masterplan, new development should take account of the following:

Loving the buzz words 'landmark development' and 'gateway to the borough'. We would suggest that the Ritz Parade be our 'landmark' and that the new bridge is 'gateway' enough to the borough.

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Policy 16 Coppicewood Lodge care home site

As we live in an aging population does LBE plan to replace this home with something fit for purpose or just encourage more flats to be built here?

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Policy 17 Arnos Grove Station

If the car parks are built on the cars will park in local side streets, residents will possibly request a CPZ, a cash cow for the local authority, raising council tax by another name.

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4.5 Neighbourhood place 2- Bowes Road

The Ritz Parade, site 11

We would not support the demolition of the existing Ritz Parade. Our 'landmark building' requires some investment and promotion.

Site 9 Telford Road Site

include:

- 1 Respecting the prevailing local character of the area.
- 2 In so doing, building heights should not higher than 3 to 4 storeys with the higher part of the building making use of the change of levels across the site and the opportunity to strengthen the turn of a street corner.

These small sites are nestled within an established residential area with a strong prevailing sub-urban character. Responding positively to that character and protecting the

If local homes are 2 storey how does 3 and 4 storey respect the local character and fit with a sub-urban character? NHHT designs seen to date are cheap and

bland with no character.

Site 10 & 11

As NHHT have been granted planning permission for these sites, schemes that do not fit with this NCAAP draft document there is little we can say other than how disappointed we are that LBE councillors failed to read, understand and work with this NCAAP document. We are equally disappointed that councillors failed to listen and act on public opinion but rather ran scared of a NHHT challenge. Councillors said that LBE cannot financially afford such a challenge. (a) In the lead up to the 2010 local elections Cllr Rodin and other Labour councillors continually criticised the Tory administration for not spending the £72m reserves the council held. We would suggest that the council dips into this reserve and does challenge developers in the name of those they say they represent, residents. (b) If the council chooses not to challenge large scale development there is no point in wasting council tax money on 'public consultation', planning officers and council meetings.

on the main road frontage.

- 2 High quality new development of up to 5 storeys in height which directly addresses the main road is considered appropriate.
- 3 On the land away from the central corner

With reference to site 10, why does the NCAAP draft document encourage development that fits with a road rather than fit with the local neighbourhood? How can this be seen as encouraging sustainable neighbourhoods

and building communities when LBE is more interested with design matching roads rather than the community and the surrounding homes.

- 6 The design of and landscaping associated with new development should incorporate measures to mitigate against noise and air pollution.

We look forward to seeing such measures.

local feature. The environment, as the A406, A1110 Bowes Road and the B1452 Wilmer Way come together, is not one considered best suited standard houses. New residential development should provide a strong built edge to this junction, with buildings adding activity and movement to the pavements. New development

When homes were first built around this junction 2 storey homes were seen as suited. Because TfL have widened the road and put an ugly bridge at this site does not mean that we should continue to harden the look of the area by building bland flats. We should continue to build 2 storey family homes, reminding drivers that

this is a place where families live and not a race track.

3 High quality design is a priority on this highly prominent site with new development of up to 6 storeys being considered appropriate.

Who says 6 storeys are appropriate? What is 'high quality design'? Designs seen to date are not high quality. The architect says he's working to a tight budget.

The land to the rear of the corner plot presents the opportunity for new mews style development which could contribute significantly to the provision of family houses in the area. Key principles for this part of the site include:

Who in 21st century says families want to live in tiny 'mews' homes? Where else within the NCCAP zone can we find family 'mews' homes that are lived in?

1 Accessed directly off Wilmer Way, the site is suitable for two storey mews style housing with private gardens arranged along the boundary with Broomfield Secondary School.

We question the safety aspect re Wilmer Way access. We suspect TfL will also question it.

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Mews developments.

1. We do not support back garden developments.
2. We think it is shocking that a housing trust has taken garden space from tenants to build more units.
3. We cannot see how 'mews' homes fits in with regular 2 storey homes that dominate the area.
4. We could go on....
- 5.

Policy 23 Ritz Parade (Site 12)

Our landmark building

The council, architects, developers, planners etc regularly refer to 'landmark buildings'. This is our landmark building, we do not want any part of this building demolished. We do want investment to improve the quality of shops held within it, the red route in the loading bay removed and the empty plot between the Ritz main building and 'Terry the butchers' parade to have a useful supermarket built on it. The supermarket, something bigger than a 'tesco express' style will help all those living in the area to shop locally rather than getting in cars and driving to shops elsewhere.

subject to the need to respect and be in keeping with local townscape character. Development must be of a high quality and make a positive architectural contribution to the local area. If

We already have an architectural contribution to the local area, the new Wilmer Way footbridge is enough for us thanks.

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Policy 24 Bowes Road sites Site 13 Powys Lane to Broomfield Road

There is reference to mature trees. Many local residents say that the mature trees have been removed by the developer.

4 storey development? This stretch of the road has 2 and in some cases 3 storey homes, not 4. We oppose 4 storey units along this stretch of the road. 4 Storey will have too greater impact on residents living on Westminster Drive.

gardens back on to the site. A new pedestrian at-grade crossing has been provided as part of the TfL improvements to the road corridor and this should improve the chance of new residents being able to support the short parade of local businesses on the opposite side of the A406.

What plans do the council have to improve, invest and encourage useful local shops into this parade?

BHORA covers parts of Southgate Green Ward and Bowes Ward as far as Green Lanes therefore this response only covers the geographical area up to Green Lanes.

Conclusion

Whilst BHORA can see that time and effort has been taken putting this document together we are disappointed that it focuses so heavily on new housing and appears to ignore all the things existing residents have called for. Councillors have told us at public meetings that they must push for new housing and grant planning permission to schemes that come in because it says so in the London Plan! We can find no reference detailing that Enfield must provide so many new homes along this short 1mile stretch of the A406. Our response to the draft document has not gone into detail regarding housing numbers, density etc but we are opposed to huge numbers of people this plan would bring into this 1mile stretch of road without any provision for extra school places, leisure facilities, retail, etc.

The NCAAP Proposed Submission Draft is of no value, councillors will grant planning permission to any scheme whether it fits the NCAAP or not.