



Date: 13 September 2021

Strategic Planning and Design  
Enfield Council  
FREEPOST  
NW5036  
EN1 3BR

By email to: [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk)

Dear Sir or Madam,

## **Representation to Regulation 18 Draft Enfield Local Plan Consultation on behalf of Notting Hill Genesis**

We write on behalf of our client, Notting Hill Genesis (NHG), and are pleased to submit this representation in response to the Draft Enfield Local Plan (DELP) 'Main Issues and Preferred Approaches' (Regulation 18) Consultation.

Notting Hill Genesis has an interest in three sites located in the London Borough of Enfield and has previously made representations as part of the 2019, 2020 and 2021 Call for Sites consultations. The sites relate to:

- 173-189 Green Lanes, London, N13 4UR;
- 1-7 Bowes Road & 141-161 Green Lanes, N13 4SP; and
- Ritz Parade, 140-186 Bowes Road, London, N11 2JG.

Site plans are provided at Appendix A.

Additionally, we have attached our representation to the 2021 Call for Sites consultation to this DELP to provide detailed support to the comments provided within this letter. This representation is attached at Appendix B.

## **Notting Hill Genesis**

Notting Hill Genesis (NHG) is one of the largest housing associations in the country and has been at the forefront of housing delivery for more than 50 years. They excel in creating high quality new homes and providing a wide range of housing solutions, working closely with residents and partners to meet local needs. NHG currently manage over 1,100 homes in Enfield and over the past 10 years they have delivered the regeneration of a series of run-down and underutilised sites along the North Circular Road. Across three phases they have refurbished and built approximately 550 homes. The majority of these homes have been allocated for residential development within the North Circular Area Action Plan (NCCAP).

## **Response to Preferred Approaches Consultation**

In terms of an overall planning policy context, the National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing, employment and other development uses can be delivered. The London Plan (2021) is the overall strategic plan for London, setting out an integrated economic, environmental,

**Our ref: KJ/AMJCG000000**

transport and social framework for development. Boroughs' local development documents must be in general conformity.

As a general point on the emerging document, the substantial level of information that is provided is disappointing. In this respect, it is considered that the volume of supporting text should be reviewed and reduced, and that clarity would be assisted through a comprehensive glossary, in addition to a clear indication of which policies apply to major applications, and which apply to minor applications.

A Local Plan should be direct, precise, and accessible to a wide range of audiences. A revision of the document to fulfil this criterion will be welcomed at Regulation 19 stage.

### **Strategic Policy SP SS1: Spatial Strategy**

NHG is supportive of Enfield's preparation of the DELP and alongside it, the identification of key challenges, issues, and objectives. These include, *inter alia*, providing the right housing and meeting the needs for all including economically, socially, and environmentally; tackling the climate emergency; creating beautiful places through a greater emphasis on placemaking; and ensuring the timely delivery of infrastructure to support potentially significant levels of growth.

NHG supports Enfield's recognition that a fundamental part of the DELP involves the spatial strategy to deliver the required level of development in the Borough over the plan period and to increase housing delivery to meet the Government's commitment to tackle the national housing crisis.

It is understood, and broadly supported by NHG, that Option 2 is the preferred spatial strategy option for the Borough. Option 2 is considered to deliver the Council's vision and strategic objectives and corporate priorities whilst also providing for an ambitious programme of development and allowing a visionary long-term approach to the delivery of environmental, economic, and social enhancements across the Borough.

It is encouraging to read that support has been given for development in town centres and local centres and those sites located in close proximity to transport nodes.

It is not clear why the North Circular Area Action Plan area has been excluded from the 'Place Making' locations as there are still substantial pockets of regeneration and investment. Reference to this important continued transformational area should be made in the policy, and throughout the Local Plan.

Refer to the continued regeneration opportunities and support for continued redevelopment in the North Circular Area Action Plan in Strategic Policy SP SS1.

### **Strategic Policy SP SS2: Making Good Places**

This policy should provide an emphasis on development surrounding transport nodes and retail / commercial centres, as set out in the Spatial Strategy. This is a fundamental element which is recognised in both the National Planning Policy Framework (2021) and in the London Plan (2021).

The draft policy sets out that the Council will ensure that development is planned and implemented in a coordinated way in the identified placemaking areas, guided by Supplementary Planning Documents, Area Investment Plans, Masterplans and/or planning briefs where appropriate. Pending the preparation and adoption of Masterplan SPDs for the identified placemaking areas and Borough-wide design guide, proposals for major development will be considered on the basis of good growth principles and policies included in the Enfield Local Plan and the London Plan.

Given the anticipated adoption date of the Enfield Local Plan, as set out in the Local Development Scheme, is early 2024, it is expected that a number of planning applications will be received by the Council for sites within the placemaking areas prior to this date. It is therefore broadly supported that proposals for major development will be considered on the basis of good growth principles and policies included in the Enfield Local Plan and London Plan.

National Planning Policy Framework updates were published in July 2021 in respect of the design, and NHG would welcome the inclusion of wording related to a Borough-wide design guide within the draft policy and

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would also encourage that both local communities and site owners are consulted to enable a collaborative working approach.

Furthermore, any design guide should give consideration to London Plan Policy D3, which outlines that development must make the best use of land by following a design-led approach that optimises the capacity of sites. London Plan Policy D3 requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth.

Recommended changes: Strategic Policy SP SS2 to include wording related to a Borough-wide design guide and the explanatory text should confirm that local communities **and** site owners will be consulted.

#### **Strategic Policy DM SE4: Reducing energy demand**

Part 5. of the policy sets out that all major developments shall monitor and report on energy use for five years after occupation.

NHG does not support this onerous policy. If it is to be pursued, the Local Authority must provide more guidance on why the monitoring report is required, what purpose it will serve and how the data will be used.

Recommended Changes: Strategic Policy DM SE4, part 5 to be removed from the draft Local Plan.

#### **Strategic Policy DM SE8: Managing Flood Risk**

The policy sets out the Council's approach to managing flood risk. It is noted that there is no inclusion in the policy of flood risk assessments in relation to those sites in Flood Zone 2 and Flood Zone 3. National Planning Policy is clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. NHG would recommend that this made clear within the policy in order to manage flood risk appropriately.

Recommended Changes: Strategic Policy DM SE8 to include wording that identifies where site specific flood risk assessment will be required.

#### **Strategic Policy DM SE10: Sustainable Drainage Systems**

The policy states that all development proposals shall be required to prepare a Sustainable Drainage Strategy to demonstrate how the proposed measures will manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan.

It should be made clear that SUDs are required for major developments only, or those where the inclusion of Sustainable Drainage Systems are necessary.

Recommended changes: A Sustainable Drainage Strategy will be required for ~~all developments~~ **all major developments or those where the inclusion of Sustainable Drainage Systems are necessary, to demonstrate how the proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan.**

#### **Strategic Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities**

The policy sets out that proposals will be expected to contribute to healthy and active lifestyles and include measures to reduce health inequalities through the provision of a set list of identified methods.

It is understood that health and wellbeing play an important role in communities however, identified methods within the draft policy should be the responsibility of the Council for the Borough which then are filtered out by individual developments. These methods are not able to be provided by applicants without direction from the Council its evidence base documents and through collaborative working.

Recommended changes: Strategic Policy SP SC1 1. to be amended from 'Proposals will be expected to contribute to **promote** healthy and active lifestyles and include measures to reduce health inequalities through the provision of **contribution to.**'

### **Strategic Policy DM BG3: Biodiversity net gain, rewilding, and offsetting**

The policy states that all development proposals shall be considered in light of the mitigation hierarchy (avoid, mitigate, and compensate) to protect most valuable ecological features of the site and minimise harm to nature.

All new development should not be required to demonstrate the above, instead NHG suggest that this is solely required from all major development.

Recommended changes: ~~New development~~ All major development proposals shall be considered in light of the mitigation hierarchy (avoid, mitigate, and compensate) to protect most valuable ecological features of the site and minimise harm to nature.

### **Strategic Policy DM BG8: Urban greening and biophilic principles**

The policy states that new development will need to demonstrate how it will exceed the urban greening factor targets set out in the London Plan and how the green features will be maintained throughout the life of the development in line with the principles of biophilic design.

All new development should not be required to demonstrate the above, instead NHG suggest that this is solely required from all major development.

It is not necessary to exceed urban greening targets that are set out in the London Plan. Developers can be *encouraged* to achieve more but cannot be required to. Furthermore, there may be site specific circumstances that mean that developers will not be able to meet the London Plan urban greening factor target. Circumstances should be set out in the policy where this may be acceptable, in addition to appropriate mitigation where necessary.

Recommended changes: ~~New development~~ All major development will be encouraged to exceed the urban greening factor targets set out in the London Plan and to show how the green features will be maintained throughout the life of the development in line with the principles of biophilic design. Reference should be made to circumstances where urban greening factor London Plan targets cannot be met and how suitable mitigation, where necessary, is applied.

### **Strategic Policy DM BG11: Blue and green infrastructure plans**

The Policy sets out that blue-green infrastructure plans must be submitted alongside major planning applications.

This is not a requirement of London Plan, and should not be applied in the Local Plan. Any draft Policy related to blue and green infrastructure plans should be in relation to contributions made by applicants to the delivery of any necessary blue infrastructure network or green infrastructure network.

Recommended changes: Council to remove Strategy Policy DM BG11 from draft Local Plan.

### **Strategic Policy DM DE1: Delivering a well-designed, high quality and resilient environment**

The policy sets out that all developments and interventions in the public realm must be high quality and design led. In addition, it sets out that development must take the opportunities available to improve an area in accordance with a set list of characteristics of well-designed places.

This draft policy is supported by NHG; however, in order to be compliant with National policy, we would welcome the inclusion of how design guides will be prepared and how they will be used in the Borough within the text of the policy.

The supporting text of the policy outlines that the Council undertook a Character of Growth study to inform the development of the Local Plan and to ensure that new development responds to the unique qualities of the borough and its communities. Figure 7.1 outlines the scale of change recommendation across the Borough.

## **Our ref: KJ/AMJCG000000**

Whilst this above forms an important part of the Local Plan, there is no recognition of this Figure within the draft policy. In addition, there are no definitions of the levels of changes set out in the Local Plan. This does not provide landowners/developers/planning agents with the relevant information in order to advance any development.

All of the sites that NHG has an interest in are outlined as being recommended for a medium level of change. NHG is in support of these being identified however, would argue that each should be increased to the next level, transformative.

The site at 173-189 Green Lanes is located within a large local centre and sits adjacent to land being identified as transformative level in Figure 7.1. It is therefore suggested that allowing the site to be increased to a transformative level of change would be in compliance with the characteristics of well-designed places as set out in the draft policy.

The site at 1-7 Bowes Road and 141-161 Green Lanes is also located within a large local centre and provides the opportunity to optimise site capacity given its location beside the A406 North Circular Road. It is therefore considered appropriate that the level of change for this site should be increased to transformative.

The site at Ritz Parade, 140-186 Bowes Road sits within a large local centre and the site which lies adjacent currently has planning permission (Site Allocation SA36). It would therefore seem logical and appropriate for both SA36 and the site allocation for Ritz Parade (Site Allocation SA38) to form a transformative level of change area within the Local Plan.

Recommended changes: Strategic Policy SP DE1 to include wording related to a Borough-wide design guide and how this will be used.

Recommended changes: Strategic Policy SP DE1 to include information and definitions of levels of change in relation to the recommended scale of change.

Recommended changes: Land at 173-189 to be identified as a transformative level of change in any relevant figure/supporting text.

Recommended changes: Land at 1-7 Bowes Road and 141-161 Green Lanes to be identified as a transformative level of change in any relevant figure/supporting text.

Recommended changes: Land at 188-200 Bowes Road (Site Allocation SAS36) and land at 140-196 Bowes Road (Site Allocation SA38) to be identified as a transformative level of change in any relevant figure/supporting text.

### **Strategic Policy SP DM DE6: Tall Buildings**

The policy sets out that the principle of tall buildings will be supported in appropriate locations and Figure 7.4 identifies areas where tall buildings could be acceptable.

Figure 7.3 provides the definition of tall buildings in the borough. It is assumed that the map shows the existing context, and clarification is sought on this matter.

Figure 7.4 identifies the appropriate locations for tall buildings along with indicative maximum heights in the London Borough of Enfield.

The sites at 173-189 Green Lanes and at 1-7 Bowes Road & 141-161 Green Lanes are not identified in Figure 7.4 as being within an appropriate location for tall buildings, therefore making any tall building on these sites unacceptable in planning terms.

All of the above sites are both located within a large local centre, making them recognisable as an area to meet the needs of local residents. In line with London Plan Policy D3, these sites should each be optimised in terms of density given their location and as such, it is suggested that this could be achieved through the designation of appropriate areas for tall buildings.

## **Our ref: KJ/AMJCG000000**

The site at Ritz Parade, 140-186 Bowes Road is also not identified in Figure 7.4 as being within an appropriate location for tall buildings.

Given the context of the area and that taller buildings are set in proximity (ranging from a height of five to seven storeys) it is suggested that optimising the quantum of housing on the site through a higher density of up to seven storeys would not be out of character with the area.

NHG wishes to see a greater level of flexibility in the appropriate locations for tall buildings. Whilst it is appreciated that the Council does not wish for a blanket approach to tall buildings in the Borough, it is often the case that individual sites will be appropriate given their location, context, and accessibility to public transport. The policy therefore should provide a series of 'exception' criterion to permit consideration of taller buildings outside the allocated locations.

Recommended changes: The tall building policy should include an 'exceptions' list whereby sites outside of the tall buildings can be considered acceptable if they meet certain criteria. This could be for exceptional design quality, proximity to local centres, good accessibility and regeneration.

Figure 7.3 should provide clarification on whether the London Plan definition of tall buildings and greater than London Plan definition relates solely to the existing borough context.

Recommended changes: Land at 173-189 Green Lanes should be designated with an appropriate area for tall buildings in Figure 7.4

Recommended changes: Land at 1-7 Bowes Road & 141-161 Green Lanes should be designated within an appropriate area for tall buildings in Figure 7.4

Recommended changes: Land at Ritz Parade, 140-186 Bowes Road should be designated within an appropriate area for tall buildings in Figure 7.4.

## **Chapter 8 – Homes for all**

NHG has noted that there is no mention or information related to First Homes within the draft Local Plan. NHG ask that this is reviewed and the Council's position on First Homes is confirmed.

Recommended changes: Draft Local Plan to include wording with respect to the Council's position on First Homes.

## **Strategic Policy SP H1: Housing development sites**

The policy notes that the Enfield Local Plan will provide for at least 24,920 new dwellings in the plan period up to 2039, equating to 1,246 homes per year. This is in line with the London Plan housing target and as such, NHG is in support of this quantum.

Site Allocation Reference SA36 (188-200 Bowes Road) is proposed for 86 residential units, which NHG supports, although the number of units should be indicative.

Site Allocation Reference SA38 (Land at Ritz Parade) is allocated for 79 residential units. NHG is supportive of this allocation, although the number of units falls short of the indicative capacity of 105 residential units, in addition to other acceptable uses such as retail, commercial and community floorspace that assessed was assessed via feasibility studies that supported the Call for Sites exercise that was submitted by NHG in February this year,

Table 8.2 of the DELP highlights the sources of supply over the plan period up to 2039. It is recognised that 1,540 units are identified as coming forward through unidentified small windfall schemes.

As outlined in the introduction and in the attached supporting information, NHG is promoting two further sites at 173-189 Green Lanes and 1-7 Bowes Road & 141-161 Green Lanes. These sites were included in the call for sites earlier this year but have not been included as Development Sites.

## Our ref: KJ/AMJCG000000

NHG continue to seek the allocation of 173-189 Green Lanes as a mixed-use redevelopment to provide approximately 55 residential units and 430sqm of retail/commercial floorspace with relevant parking/servicing from Broadway Mews. This allocation would limit the dependency on windfall schemes and other site allocations during the plan period. The site is available, deliverable and would assist in providing a quantum of at least 55 residential units which would contribute to meeting the Council's housing targets.

NHG are also continuing to seek the allocation of 1-7 Bowes Road & 141-161 Green Lanes as a mixed-use redevelopment to provide approximately 157 residential units, circa 440sqm of retail/commercial floorspace and community/health facility of circa 700sqm.

This redevelopment scheme was the subject of pre-application advice in October 2018 (Ref. 18/01206/PREAPP). The Council's formal pre-application response supported the principle of the comprehensive development of the site, its proposed uses and the overall design approach. It is considered that this scheme forms an appropriate basis for a residential-led mixed use allocation and therefore, should be included within the site allocations in the Local Plan.

Both of the sites which form 1-7 Bowes Road & 141-161 Green Lanes were assessed within the Strategic Housing Land Availability Assessment and were concluded to be developable and referenced as BOC2 and BOC3 respectively. It is, therefore, unclear why the sites have not been included within draft Policy H1. In addition, Site SHLAA Reference BOC4 (141-145 Green Lanes) was discounted due to the site size being under 1ha however, this representation highlights that the site would come forward as part of a wider site allocation.

Recommended changes: Strategic Policy SP H1 should be amended to state that Site Allocation Reference SA38 (Land at Ritz Parade) has an estimated capacity for a (minimum of) 105 units and other acceptable alternative uses, including retail/commercial and community floorspace.

Recommended changes: Strategic Policy SP H1 should allocate the site at 173-189 Green Lanes for mixed-use development with an estimated capacity of 55 residential units.

Recommended changes: Strategic Policy SP H1 should allocate the site at 1-7 Bowes Road & 141-161 Green Lanes for mixed-use development with an estimated capacity of 157 residential units.

Recommended changes: Amendment to be made to Figure 3.2 for the inclusion of 173-189 Green Lanes and 1-7 Bowes Road & 141-161 Green Lanes as two separate site allocations in the Local Plan.

## Strategic Policy SP H2: Affordable Housing

The policy states that in exceptional circumstances, off-site provision, or contributions of broadly equivalent will be accepted where it:

- avoids an over-concentration of one type of housing (both on and off site) to ensure mixed and balanced communities;
- secures a greater proportion of affordable units overall; and
- offers the best way of delivering affordable homes, including a higher level of affordable rented family homes.

NHG supports the ability for exceptional circumstances to be considered in the provision of affordable housing as set out in the draft policy. Nonetheless, to be compliant with London Plan Policy H4, it is suggested that the draft policy wording be amended from 'and' to 'or'. London Plan Policy H4 notes that affordable housing must be only provided off-site or as a cash in lieu contribution in exceptional circumstances where it can be robustly demonstrated that affordable housing cannot be delivered on-site or where an off-site contribution would better deliver mixed and inclusive communities than an on-site contribution.

To have a level of flexibility written within the policy, and to be compliant with the London Plan, the ability for consideration to be given to exceptional circumstances on the provision of affordable housing will ensure that developments are viable.

**Our ref: KJ/AMJCG000000**

In this respect, donor sites can be one way of accommodating the affordable housing generated by the development on another site. As such, donor sites provide a good opportunity for schemes to provide optimised delivery of affordable housing and to ensure that there are mixed and balanced communities in an area. For this reason, it is particularly beneficial for donor sites to be located in close proximity within the same borough.

The policy goes on to state that flexibility in the tenure mix will be allowed subject to viability where developments propose more than 50% affordable housing. This is not in accordance with London Plan policy. Tenure amendments contrary to planning policy are acceptable subject to viability at any level of affordable housing provision. Furthermore, the supporting text in 8.2.10 states that in exceptional circumstances where a reduced affordable housing contribution can be justified on viability grounds, the applicant will be required to enter into a planning agreement to implement the scheme within 12 months of the granting of the planning consent and deliver the agreed affordable housing contribution within a specific timescale. If the development is not implemented or affordable housing is not delivered within the agreed timescale, the applicant will be expected to deliver the full affordable housing requirement or in the case of renegotiated schemes revert to the original agreed position. This is also contrary to the London Plan, is ultra vires and should therefore be removed from the supporting text.

Recommended changes: Wording in Strategic Policy SP H2 should be amended as follows: avoids an over-concentration of one type of housing (both on and off site) to ensure mixed and balanced communities **or** secures a greater proportion of affordable units overall; ~~and~~ **or** offers the best way of delivering affordable homes, including a higher level of affordable rented family homes.

Recommended changes: Wording in Strategic Policy SP H2 should be amended as follows: Affordable housing should be provided in line with the guideline mix of 50% social affordable rented housing and 50% intermediate housing. Flexibility in the tenure mix will be allowed subject to viability. ~~where developments propose more than 50% affordable housing.~~

Recommended changes: Supporting text paragraph 8.2.10 should be removed.

**Strategic Policy SP H3: Housing mix and type**

The policy outlines that the provision of new homes should contribute to meeting the needs of current and projects households having regard the providing an appropriate mix of dwelling types and sizes. The Council sets out the dwelling size priorities in Table 8.4 which is displayed below:

|                            | Studio       | One-Bed         | Two-Bed         | Three-Bed       | Four+ Bed     |
|----------------------------|--------------|-----------------|-----------------|-----------------|---------------|
| Social / Affordable Rented | Low Priority | Medium Priority | High Priority   | High Priority   | Low Priority  |
| Intermediate               | Low Priority | High Priority   | High Priority   | Medium Priority | Low Priority  |
| Market                     | Low Priority | Low Priority    | Medium Priority | High Priority   | High Priority |

Whilst NHG has no specific modifications to the draft policy, the London Plan glossary term for ‘family housing’ should be considered in this section. The glossary term sets out that family housing is a dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five or more bedrooms. Enfield Council should also recognise a transition in traditional family housing and that two-bedroom properties which cater for four people should also considered to be family housing.

Greater flexibility to the policy should be considered as there may be material considerations which limit a site’s ability to provide the specified housing unit mix as set out in the policy. An example of this material consideration would be the site’s context and location and how this would have an effect on the unit mix sought



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of any development. This is particularly relevant to central locations that may be more appropriate for a higher proportion of 1 and 2 bed units.

Recommended changes: Strategic Policy SP H3 to include wording that allows greater flexibility for developers in the provision of housing mix and type dependent on the context of the site.

#### **Strategic Policy SP E4: Supporting offices**

The policy states that proposals which result in the net loss of office floorspace will be resisted unless there is no current or future market demand for the site as evidenced through a period of at least 24 months of active marketing for office employment uses at realistic market rates.

Whilst NHG Development is in broad support of this policy, it suggests that the 24 months be reduced to 12 months given the economic context of London is continually evolving and the office market has been directly impacted with more people working from home and remotely. The market is agile and there should be flexibility to permit alternative uses in a shorter time period to ensure the viability of an existing unit(s) or scheme.

Recommended changes: Strategic Policy SP E4 to alter wording to a period of **at least 12 months** instead of ~~at least 24 months~~.

#### **Strategic Policy DM E8: Local jobs, skills and local procurement**

Part 2 of the policy outlines that where proposals result in a net loss of employment (land, floorspace, uses or jobs) and there is a justification to approve the scheme, it is expected that these types of proposals will be required to enter into a section 106 agreement to relocate the existing businesses to suitable premises in the locality; or provide the equivalent number of jobs elsewhere within the Borough; or make a financial contribution towards industrial land regeneration projects, employment training schemes, job brokerage services or business support initiatives.

This policy is in direct contradiction to draft policy SP E4 which provides justification where the net loss of office floorspace would be acceptable and appropriate. Policy SP E4 does not set out that there would be any consequences for this, provided that the office floorspace has been marketed appropriately.

The policy as drafted is ultra vires and could impact on the deliverability and viability of a proposed development scheme. It should therefore be deleted.

Recommended changes: Council to remove part 2 of Strategic Policy DM E8.

#### **Strategic Policy DM D2: Masterplans to achieve comprehensive development**

The policy sets out that proposals must be accompanied by a masterplan where they form all or part of a site allocation.

This is in direct conflict to Strategic Policy SP SS2 which sets out that the Council will ensure that development is planned and implemented in a coordinated way in the identified placemaking areas, guided by Masterplans. Pending the preparation of and adoption of Masterplan SPDs for the identified placemaking areas and Borough-wide design guide, proposals for major development will be considered on the basis of good growth principles and policies included in this plan and the London Plan.

As such, NHG does not support this policy and advise that the Council amends it so that the Local Plan can be read as a whole and the policies within it complement each other.

Recommended changes: Removal of Strategic Policy DM D2.

#### **Strategic Policy SP TC2: Encouraging vibrant and resilient town centres**

The policy states that local centres and parades will serve neighbourhood retail, food and drink, business and service and community needs. In addition, it sets out that changes of use at ground floor level must retain a shopfront and provide active frontages to the public realm and proposals for residential uses at ground floor level will be refused.

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Bowes Road and Green Lanes are both identified as large local centres in Table 10.1 of the DELP which sets out the hierarchy of town centres. As such, the role and function of these large local centres are to safeguard and promote the provision of day-to-day goods, services and community uses to meet the needs of local residents which each typically accommodating over 40 outlets and over 4,000sqm of gross floorspace.

NHG are in support of this policy and agree that large local centres should continue to provide service and uses to benefit the needs of local residents. NHG suggests that the policy is amended to ensure remove the wording in the policy stating that proposals for residential uses at ground floor level will be refused. The economic context of London has changed over the past two years, indirectly sped up by the Covid-19 Pandemic and as such, there is significant decrease in demand for commercial uses in some areas given the rise of online retail. There has been a greater movement of commercial/retail uses becoming neighbours to residential uses through Government mechanisms such as the introduction of Class E to residential permitted development rights. As such, greater flexibility should be inserted in this policy to permit the loss of non-residential uses on the lower ground floors of retail centres for a wider variety of uses, including residential, where appropriate. A set of exceptions criteria that relate, for example, to a marketing period; sequential approach to land uses and so on would be beneficial to ensuring the continued viability and vitality of these hubs.

Recommended changes: Strategic Policy SP TC2 amended to remove ~~proposals for residential uses at ground floor level will be refused.~~ An exceptions policy should be drafted to permit other uses on the lower ground floors (which could include residential) subject to relevant criteria, including marketing period, sequential approach to land uses and so on.

### **Strategic Policy DM D3: Infrastructure and phasing**

The policy sets out that applicants will need to demonstrate that sufficient infrastructure capacity exists or will be made available to support the development over its lifetime (taking account of existing deficits as well as the needs it will generate).

In addition, supporting text to policy DM D3 sets out that appropriate measures will need to be put in place to secure the ongoing maintenance and management of infrastructure and services as part of new development and that where appropriate, contributions will be sought towards on-going revenue costs relating to the physical upkeep and management of infrastructure assets associated with the proposed development. It goes on to state that planning applications will be expected to explain how this infrastructure will be maintained and managed over time.

This policy is not supported by NHG and is strongly opposed that infrastructure requirements are the applicant's responsibility. All infrastructure requirements should be delivered and monitored through the Council's Infrastructure Delivery Plan.

Recommended changes: Remove from Strategic Policy DM D3 ~~applicants will need to demonstrate that sufficient infrastructure capacity exists or will be made available to support the development over its lifetime (taking account of existing deficits as well as the needs it will generate) in line with the priorities and phasing requirements set out in the Infrastructure Delivery Plan.~~

## **Conclusion**

We trust that the comments herein provide a useful contribution to inform the ongoing preparation of the Enfield Local Plan.

We also wish to contribute towards the future stages of the Enfield Local Plan process and therefore would be grateful if the Council could advise of further opportunities for participation and the submission of representations and sites.

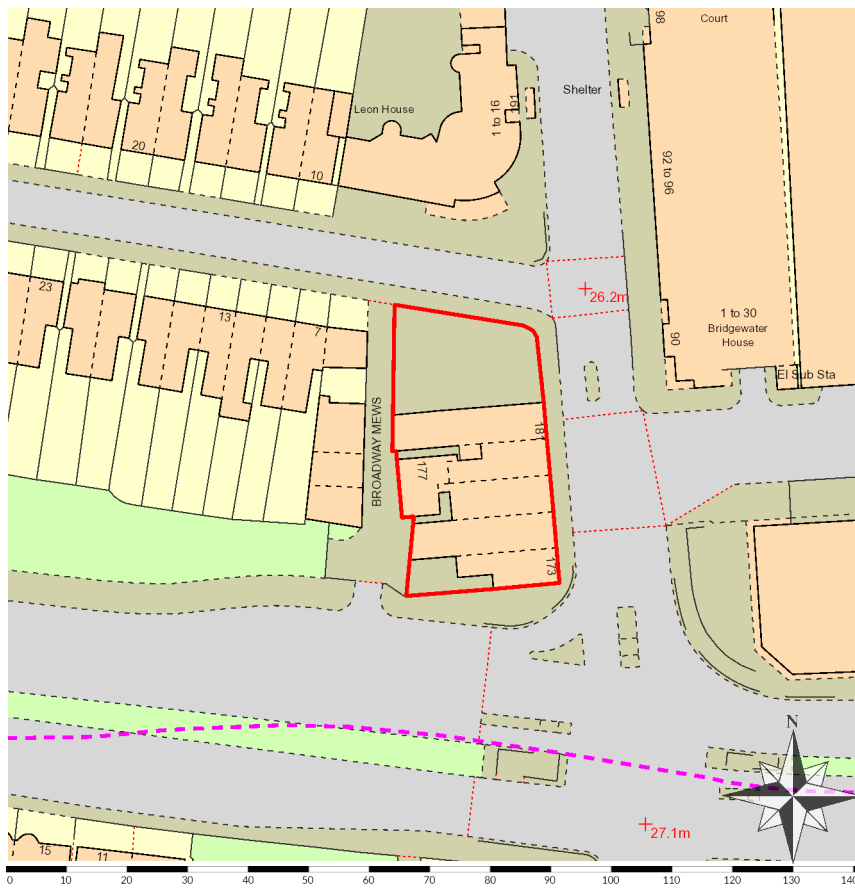
NHG are committed to continuing to work in partnership with the Council to deliver these strategic goals, the regeneration of sites in the borough and benefits to the local communities.

Please do not hesitate to contact me should you have any queries regarding this representation or require any further information.

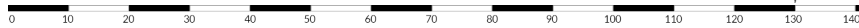
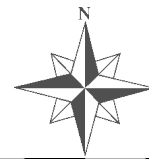
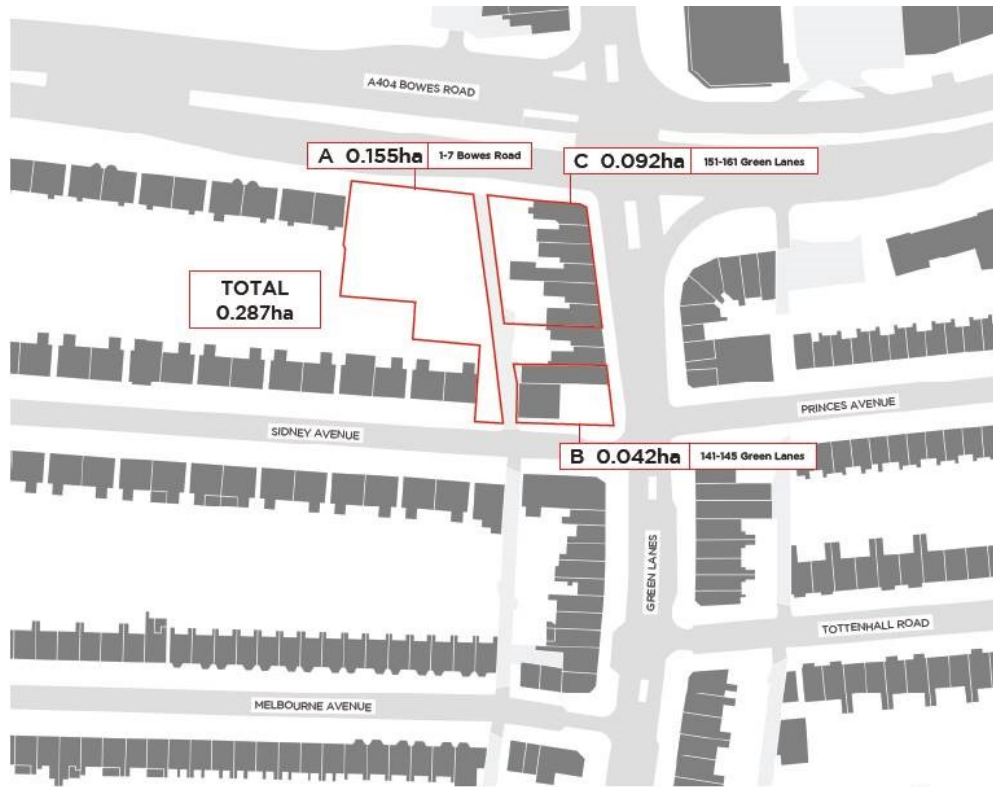
**Our ref: KJ/AMJCG000000**

Yours faithfully,  
for RPS Consulting Services Ltd

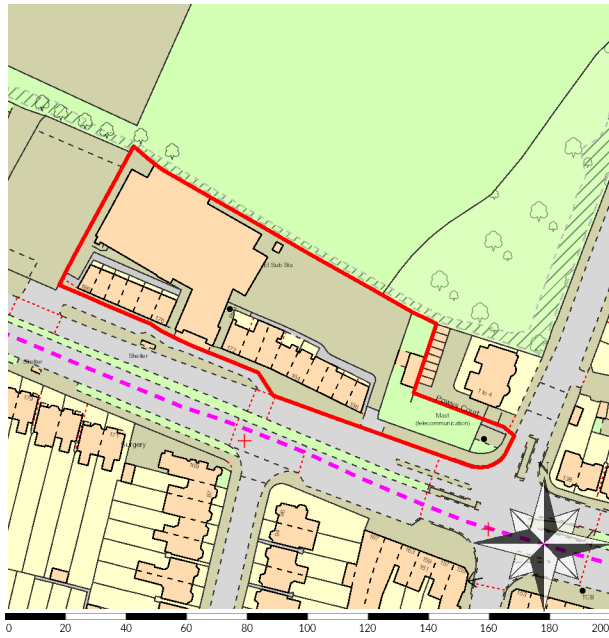
## Appendix A



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Scale: 1:2500 | Area 4Ha | Grid Reference: 530101,192200 | Paper Size: A4

## Appendix B





[www.nhgggroup.org.uk](http://www.nhgggroup.org.uk)

Planning Policy  
Planning and Transportation  
PO Box 53  
Civic Centre  
Silver Street  
Enfield  
EN1 3XE

26 February 2021

Dear Sir/Madam

**ENFIELD LOCAL PLAN, 2021 CALL FOR SITES CONSULTATION  
REPRESENTATIONS ON BEHALF OF NOTTING HILL GENESIS**

Notting Hill Genesis (NHG) are pleased to submit representations in response to the London Borough of Enfield's 2021 Call for Site consultation.

NHG is one of the leading housing associations in the country and has been at the forefront of housing for more than 50 years. We excel in creating high quality new homes and providing a wide range of housing solutions, working closely with residents and partners to meet local needs. NHG currently manage over 1100 homes in Enfield and over the past 10 years we have delivered the regeneration of a series of run-down and underutilised sites along the North Circular Road. Across three phases we have refurbished and built approximately 550 homes. The majority of these homes have been allocated for residential development within the North Circular Area Action Plan (NCCAP)

We previously made submissions promoting development of four of our sites in the borough as part of the 2019 and 2020 Call for Sites consultation.

Since our March 2020 Call for Sites submission there have been no material change in circumstances or planning policy. The December 2020 Publication London Plan continues to identify an urgent need for new housing, to prioritise the development of highly accessible brownfield sites and for development to be optimised using a design led approach.

Accordingly, we wish to confirm that three of these sites should continue to be considered as part of the preparation of the new Local Plan. One of the sites, 54 Tewkesbury Terrace, was sold in October 2020 and is no longer in our ownership. Therefore, we wish to withdraw it from consideration.

Therefore, the three sites that should continue to be considered are outlined below, and our 2020 representations are enclosed in the Appendices of this letter for your information. Each of these sites are currently allocated for residential development within the NCCAP.

- 173-189 Green Lanes, London, N13 4UR, **Appendix A**
- 1-7 Bowes Road & 141-161 Green Lanes, N13, 4SP, **Appendix B**

Notting Hill Genesis  
Bruce Kenrick House  
2 Killick St, London, N1 9FL

Phone 020 3815 0000  
Fax 020 3815 0005  
Email [info@nhhg.org.uk](mailto:info@nhhg.org.uk)



- Ritz Parade, 140.-186 Bowes Road, London, N11 2JG, **Appendix C**

NHG are committed to continuing to work in partnership with the Council to deliver these strategic goals, the regeneration of sites in the borough and benefits to local communities. We look forward to receiving confirmation that these representations have been received. Should you have any queries please do not hesitate to contact Danielle Lennon on the details below.

Yours faithfully

A handwritten signature in black ink, appearing to read "Danielle Lennon".

Danielle Lennon

Assistant Planning Director

Notting Hill Genesis

Bruce Kenrick House, 2 Killick Street, London, N1 9FL

Email: [danielle.lennon@nhhg.org.uk](mailto:danielle.lennon@nhhg.org.uk)

Tel: 020 3815 0158



**Appendix A: NHG Call for Sites Representation, March 2020**

173-189 Green Lanes, London, N13 4UR,

## Call for sites submission form

As part of the plan making process the Council is undertaking a further 'Call for Sites' inviting anyone with an interest in land, potential sites and broad locations for development to submit these to us for consideration. We especially want proposals to come forward for small and medium sites for housing particularly in the built-up areas of Enfield.

For such brownfield sites the Council not only wants to be able to identify the land or buildings themselves, we also want to be able to understand the schemes that are being proposed. This will help us to assess the capacity and deliverability of such sites, and whether they are available, suitable and viable. These sites will then be assessed and if deliverable will be consulted upon in the next stage of the Local Plan.

Please complete a submission form for each individual site you are submitting and include a site location plan (preferably an OS Map), clearly showing the boundaries of the site outlined in red (or otherwise clearly marked). The map should show at least two named roads, to ensure that the site can be correctly identified. A postcode would also help to locate the site, even where this relates to adjacent land or buildings.

Sites should be capable of delivering one or more residential dwellings.

**The deadline for all responses is 5pm on Friday 6 March 2020.**

Responses received after the deadline can only be accepted in exceptional circumstances. If you use the Council's online consultation portal, you will receive an automatic message to confirm receipt of your response and you can also view all comments that have been made.

Representations cannot be made anonymously, so please provide your full name and contact details. Please note that representations will be made publicly available, along with your name.

Please complete to your knowledge a separate form for each site and return by email to: [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk) quoting 'Call for sites' in the subject field.

If you do not have internet access, you can post your response to:

Strategic Planning and Design Team, Enfield Council, FREEPOST, NW5036, EN1 3BR

Or telephone 020 8379 3866

Thank you

## Enfield's draft new Local Plan 2036

### Call for Sites 2020 Submission Form

| Contact details                   |  |                            |   |
|-----------------------------------|--|----------------------------|---|
| <b>Name:</b>                      | Danielle Lennon  |                            |   |
| <b>Organisation:</b>              | Notting Hill Genesis   |                            |   |
| <b>Address:</b>                   | Bruce Kenrick House, 2 Killick Street, London                              |                            |   |
| <b>Postcode:</b>                  | N1 9FL   |                            |   |
| <b>Telephone:</b>                 | 0203 815 0158  |                            |   |
| <b>Email:</b>                     | <a href="mailto:danielle.lennon@nhg.org.uk">danielle.lennon@nhg.org.uk</a> |                            |   |
| <b>Your interest in the site:</b> | I am a...  | Developer                  | X |
|                                   |  | Freeholder                 | X |
|                                   |  | Leaseholder                |   |
|                                   |  | Resident                   |   |
|                                   |  | Potential purchaser        |   |
|                                   |  | Community group            |   |
|                                   |  | Planning consultant        |   |
|                                   |  | Registered social landlord |   |
|                                   |  | Other (please specify)     |   |

| Site details                                  |   |                                     |    |
|---|---|-------------------------------------|----|
| <b>Site address (or location)</b>             | 173 – 189 Green Lanes, London, N13 4UR  |                                     |    |
| <b>Site area in hectares or square metres</b> | 0.093 ha  |                                     |    |
| <b>Site location plan submitted?</b>          | Yes   | <input checked="" type="checkbox"/> | No |
| <b>Current or most recent use of the site</b> | <p>173 – 181 Green Lanes is comprised of three storey buildings with retail/commercial units at ground floor with residential flats above.</p> <p>183 – 189 Green Lanes is hardstanding used for car sales.</p> |                                     |    |

| Ownership of the site  |   |                          |    |                                     |  |
|--|---|--------------------------|----|-------------------------------------|--|
| <b>Please provide details of landownership/land interests if known</b>                           | <p>Notting Hill Genesis are the freeholder for the majority of the site. These properties are let on short term leases.</p> <p>181 Green Lanes and a small area to the rear of 177 &amp; 179 Green Lanes are in separate ownership.</p> |                          |    |                                     |  |
| <b>Are all the above owners/those with a land interest aware of this submission of the site?</b> | Yes   | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | <p><b>If 'No' please give reasons</b></p> <p>The properties in Notting Hill Genesis' ownership are let on short term leases.</p> <p>The entire site is already allocated as part of the North Circular Area Action Plan. Discussions with the other landowner would be undertaken as part of bringing the development forward.</p> |

| <b>Proposed development</b>  |   |                                      |
|--|---|--------------------------------------|
| <b>What type of development is proposed? Please provide further details of the type of residential / employment / cultural / retail or mixture of uses proposed.</b>         | Residential   | Approx. 55 residential flats         |
|  | Employment / Industrial   |                                      |
|  | Retail / commercial   | Approx. 430 retail/commercial space. |
|  | Office  |                                      |
|  | Arts and culture  |                                      |
|  | A mixture of types  |                                      |
|  | Other (please specify)  |                                      |
| <b>Please tell us more about the proposed type of development...</b>   | <p>Mixed use redevelopment to provide 55 residential flats and 430 sq.m retail/commercial floorspace, with parking/servicing from Broadway Mews.</p> <p>The building is four storeys in height along Green Lanes, rising to 12 storeys fronting onto the North Circular Road.</p> |                                      |
| <b>What is the potential capacity of the site? (Please provide approximate dwelling numbers and densities or approximate floorspace for employment / office development)</b> | <ul style="list-style-type: none"> <li>Approx. 55 residential flats</li> <li>Approx. 430 retail/commercial space.</li> </ul> <p>Residential density of approximately 750 habitable rooms per hectare.</p>   |                                      |



| Site details  |   |   |   |
|---|---|---|---|
| <b>Does the site have direct access to the existing highway network?</b>  | Yes X   | Further comment:<br>Green Lanes and Broadway Mews |   |
|   | No  |   |   |
| <b>What access is there in terms of public transport?</b>   | Bus stop  | X   | Distance in Km: 0.03 km on Green Lanes          |
|   | Railway / tube station  | X   | Distance in Km: 0.6 km to Palmers Green Station |
| <b>Are there any known constraints to the site? (access difficulties, ground conditions, contamination, flood risk, legal issues or any others)</b> | N/A   |   |   |
| <b>Are there any known environmental constraints on, or in close proximity to the site? (i.e. Green Belt, Metropolitan Open Land, Biodiversity)</b> | Part of the site lies within Flood Zone 2.  |   |   |
| <b>Has any work been done on the promotion of the site? (e.g. legal reports, traffic surveys, ecology reports etc)</b>                              | No.<br><br>This study was also submitted as part of the Dec 2018 to Feb 2019 'Call for Sites' consultation. |   |   |
| <b>Are any of the following services available on or to the site?</b>   | Water   | Yes   |   |
|   | Electricity   | Yes   |   |
|   | Gas   | Yes   |   |
|   | Foul sewer  | Yes   |   |
|   | Surface water sewer   | Yes   |   |

|  |                     |     |  |
|--|---------------------|-----|--|
|  | Broadband           | Yes |  |
| <b>Does the proposed site require amendments to existing services?</b> | Water               | Yes |  |
|  | Electricity         | Yes |  |
|  | Gas                 | Yes |  |
|  | Foul sewer          | Yes |  |
|  | Surface water sewer | Yes |  |
|  | Broadband           | Yes |  |

**Delivery and timing**

|   |           |
|---|-----------|
| <b>Broadly, when do you think that the site could become available for the commencement of development?</b> | 1-5 years |
|   |           |
|   |           |
|   |           |

### Any other relevant information

**Please provide any other relevant information below:**

The site is located within the Green Lanes Local Centre and has good public transport accessibility. It is also allocated within the North Circular Area Action Plan (NCCAP, Site 16) for 'commercial with flats above and infill house'. The proposed development would be in-line with this site allocation but has optimised the density, in accordance with the Policy D6 (Optimising Density) of the draft London Plan.

The site immediately to the south is also allocated within the NCAAP (Site 18) and is within Notting Hill Genesis' ownership. It has been subject to a separate response to the Call for Sites. NCAAP Sites 17 and 19 are also next to the junction of Green Lanes with the North Circular Road.

The development would be four storeys in height along Green Lanes and two storeys on Elmdale Road, in-line with the prevailing building heights of these streets. The site's frontage onto the North Circular Road, presents a new opportunity for greater height, particular given its distance from residential properties, with wide roads to the south and east, and a green verge directly to the west.

Therefore 12 storeys in considered to be an appropriate height in this location and the building will serve as a local wayfinder for the Green lanes Local Centre whilst enabling the delivery of additional housing units, contributing to Enfield's housing supply.

Car parking and servicing areas would be to the rear of the site, accessed from Broadway Mews. Draft London Plan Policy T6 (Car Parking) outlines that sites with good public transport accessibility car-free development should be the starting point for all development proposals.

The site's urban location and the limited ability to provide car parking, and outdoor amenity space and playspace, means that the site is better suited to a mix of smaller units that will complement the family housing prevalent in the wider area.

Finally, the proposal would delivery high quality retail and commercial space, enhancing the Local Centre and benefiting the local community.

Overall, the proposed development would optimise the use of the site, and improve upon the existing run down buildings and areas of hard standing. The site is an appropriate location for high density development and a tall building. It is therefore considered that the existing site allocation (Site 16) should be extended to optimise the development of the site.

### Future updates

Please tick this box if you do not wish to be added to our contact list and be updated about future progress on the Local Plan and other planning policy updates.

X

## LOCATION

This site is situated within the Bowes Ward of the London Borough of Enfield, bordering the Palmers Green Ward directly to the north.

The site is located at the major intersection between Bowes Road (also known as the A406 / North Circular Road) and Green Lanes,

The site falls within an area with PTAL rating 4, with good access to public transport including local and regional bus routes along Bowes Road and Green Lanes, and within walking distance of Bounds Green underground station on the Picadilly line and overground routes from Bowes Road and Alexandra Palace stations.

The site is located within Flood Zone 1, which is the lowest risk definition.

The site is located at the junction of Bowes Road and Green Lanes, and is approximately 0.093 hectares in size. 181 Green Lanes, Broadway Mews and 177 Broadway Mews (a workshop unit) is outside Notting Hill Genesis ownership.



▲ Site plan - Aerial View (source: Google Maps)



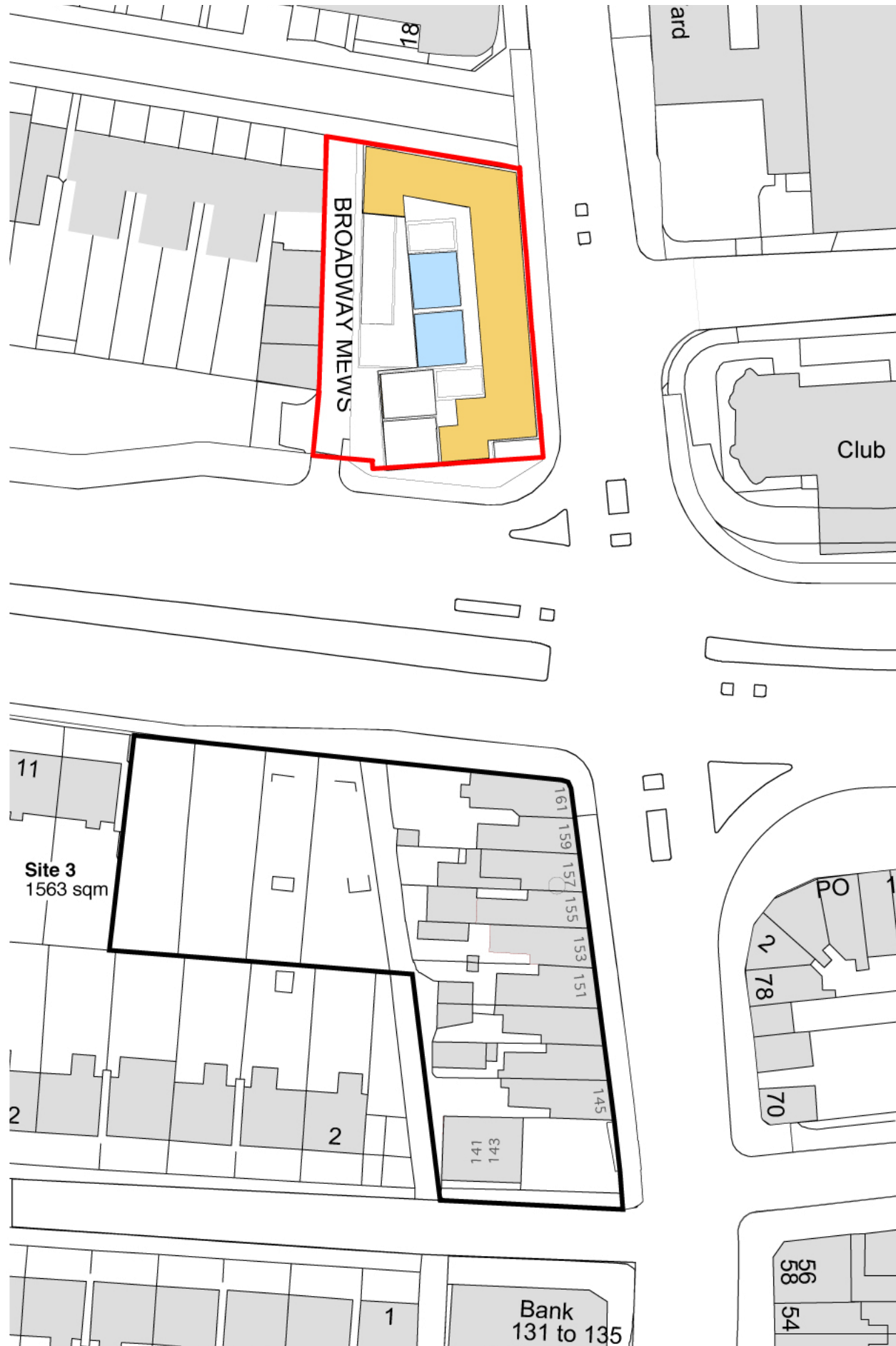
▲ Site ownership plan- Aerial View (source: Google Maps)

- Key
- Site boundary
  - Site ownership

## Note

- All areas are **approximate** and subject to change. Feasibility study for discussion only. Development is subject to Rights of Light, Planning Permission, Building Control, Statutory Undertaker Searches and Assessment by a Structural Engineer.
- Site boundary is subject to Title Plan and only for feasibility study purposes.





KEY

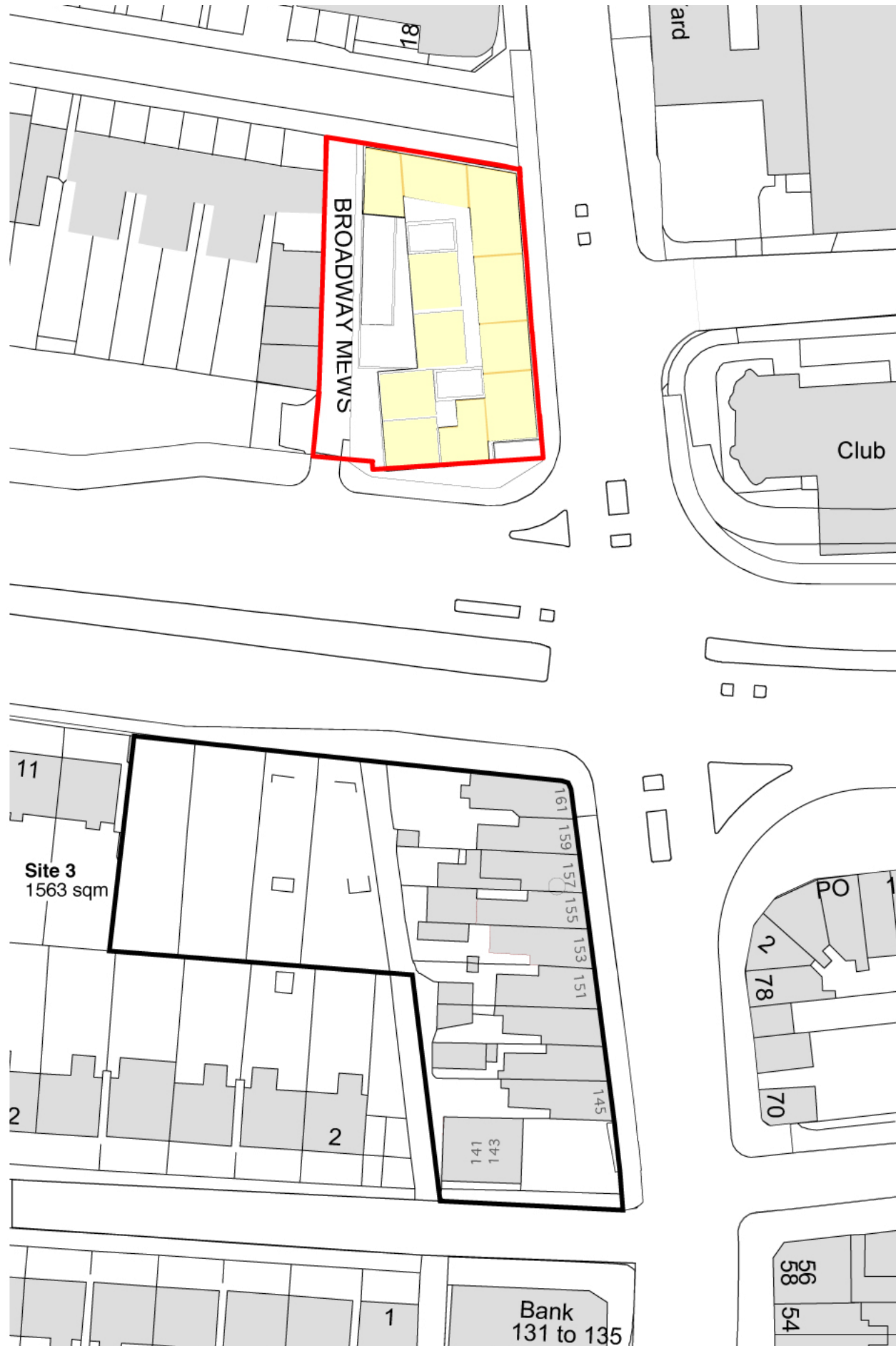
- Adjacent Site
- Boundary Site
- 430 SQM of Commercial use
- Parking / Servicing
- 55 Residential Units

Developed area 1400sqm/0.14Ha

55 new units

430 sqm commercial space  
approx 105 HR

approx 750 HR/Ha



KEY

- Adjacent Site
- Boundary Site
- 430 SQM of Commercial use
- Parking / Servicing
- 55 Residential Units

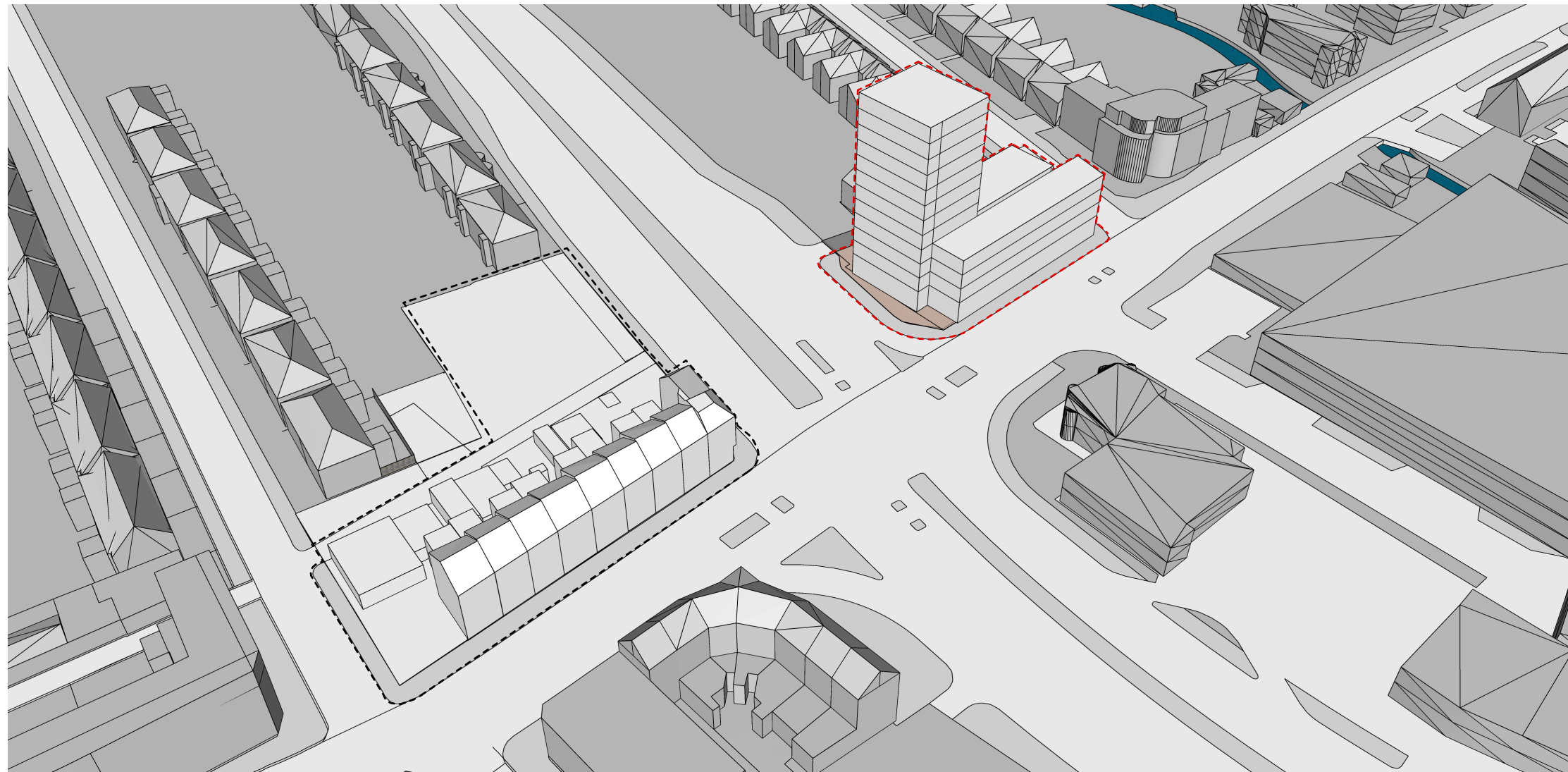


Developed area 1400sqm/0.14Ha

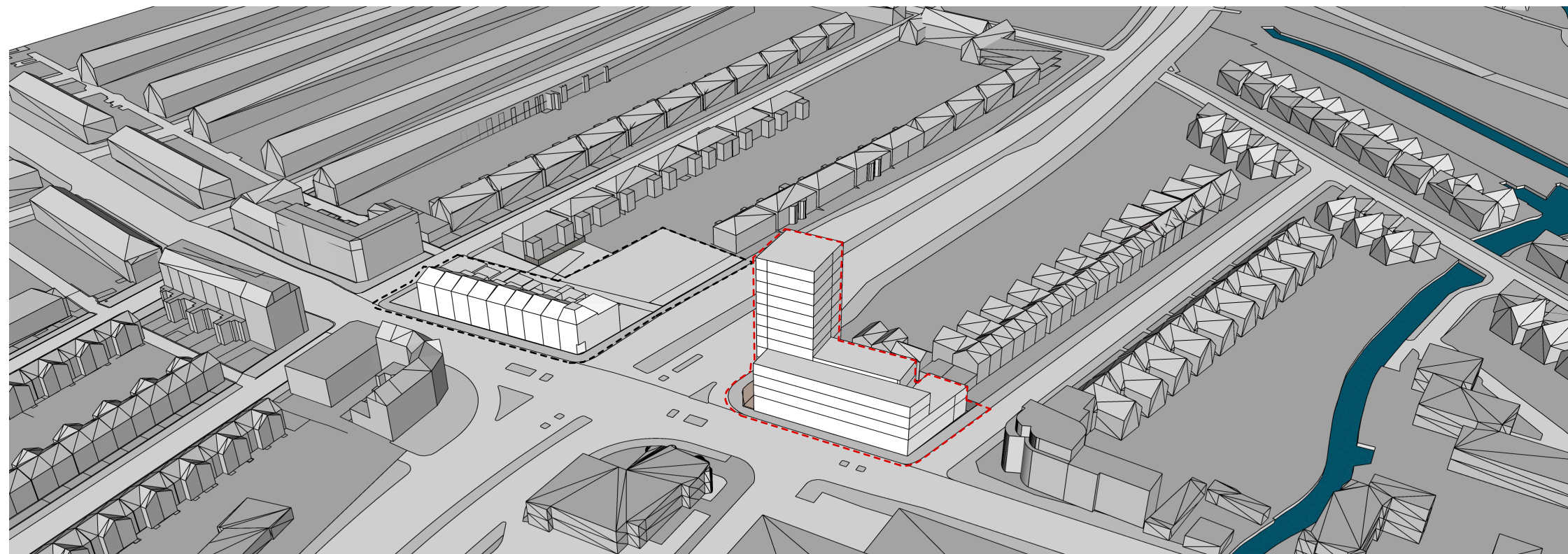
55 new units

430 sqm commercial space  
approx 105 HR

approx 750 HR/Ha



- KEY
- Adjacent Site
  - Site Boundary





**Appendix B: NHG Call for Sites Representation, March 2020**

1-7 Bowes Road & 141-161 Green Lanes, N13, 4SP



## Call for sites submission form

As part of the plan making process the Council is undertaking a further 'Call for Sites' inviting anyone with an interest in land, potential sites and broad locations for development to submit these to us for consideration. We especially want proposals to come forward for small and medium sites for housing particularly in the built-up areas of Enfield.

For such brownfield sites the Council not only wants to be able to identify the land or buildings themselves, we also want to be able to understand the schemes that are being proposed. This will help us to assess the capacity and deliverability of such sites, and whether they are available, suitable and viable. These sites will then be assessed and if deliverable will be consulted upon in the next stage of the Local Plan.

Please complete a submission form for each individual site you are submitting and include a site location plan (preferably an OS Map), clearly showing the boundaries of the site outlined in red (or otherwise clearly marked). The map should show at least two named roads, to ensure that the site can be correctly identified. A postcode would also help to locate the site, even where this relates to adjacent land or buildings.

Sites should be capable of delivering one or more residential dwellings.

**The deadline for all responses is 5pm on Friday 6 March 2020.**

Responses received after the deadline can only be accepted in exceptional circumstances. If you use the Council's online consultation portal, you will receive an automatic message to confirm receipt of your response and you can also view all comments that have been made.

Representations cannot be made anonymously, so please provide your full name and contact details. Please note that representations will be made publicly available, along with your name.

Please complete to your knowledge a separate form for each site and return by email to: [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk) quoting 'Call for sites' in the subject field.

If you do not have internet access, you can post your response to:

Strategic Planning and Design Team, Enfield Council, FREEPOST, NW5036, EN1 3BR

Or telephone 020 8379 3866

Thank you

## Enfield's draft new Local Plan 2036

### Call for Sites 2020 Submission Form

| Contact details                   |  |                            |   |
|-----------------------------------|--|----------------------------|---|
| <b>Name:</b>                      | Danielle Lennon  |                            |   |
| <b>Organisation:</b>              | Notting Hill Genesis   |                            |   |
| <b>Address:</b>                   | Bruce Kenrick House, 2 Killick Street, London                              |                            |   |
| <b>Postcode:</b>                  | N1 9 FL  |                            |   |
| <b>Telephone:</b>                 | 0203 815 0158  |                            |   |
| <b>Email:</b>                     | <a href="mailto:danielle.lennon@nhg.org.uk">danielle.lennon@nhg.org.uk</a> |                            |   |
| <b>Your interest in the site:</b> | I am a...  | Developer                  | X |
|                                   |  | Freeholder                 | X |
|                                   |  | Leaseholder                |   |
|                                   |  | Resident                   |   |
|                                   |  | Potential purchaser        |   |
|                                   |  | Community group            |   |
|                                   |  | Planning consultant        |   |
|                                   |  | Registered social landlord |   |
|                                   |  | Other (please specify)     |   |

| Site details                                  |  |   |    |
|---|--|---|----|
| <b>Site address (or location)</b>             | 1-7 Bowes Road & 141 – 161 Green Lanes, N13 4SP  |   |    |
| <b>Site area in hectares or square metres</b> | 0.3 ha   |   |    |
| <b>Site location plan submitted?</b>          | Yes  | X | No |
| <b>Current or most recent use of the site</b> | <p>1-7 Bowes Road is vacant disused land stretching between Bowes Road and Sidney Avenue.</p> <p>Nos. 145 to 161 Green Lanes is a terrace of shopfront properties. Currently these buildings are in varied states of occupancy and disrepair. The upper floors contain flatted accommodation.</p> <p>Nos. 141 – 143 Green Lanes is comprised of a single storey building used as a vehicle garage and has a forecourt car park onto Green Lanes.</p> |   |    |

| <b>Ownership of the site</b>   |   |  |    |   |  |
|--|---|--|----|---|--|
| <b>Please provide details of landownership/land interests if known</b>                         | <p>As detailed in the accompanying feasibility document, Notting Hill Genesis (NHG) are the freeholder for the majority of the site, with the properties let on short term leases.</p> <p>Nos. 147 to 149 Green Lanes are outside of NHG's ownership.</p> <p>The access road to the rear of the Green Lanes terrace is currently unregistered and its ownership is not known.</p> |  |    |   |  |
| <b>Are all the above owners/those with land interest aware of this submission of the site?</b> | Yes   |  | No | X | <p><b>If 'No' please give reasons</b></p> <p>The occupiers of the buildings in Notting Hill Genesis' ownership have short term leases.</p> <p>The owners of the access road to the rear of Green Lanes are not known.</p> <p>The owners of 147 to 149 Green Lanes will be consulted if the allocation is successful; however, they are aware of Notting Hill Genesis' ownership of the wider site.</p> |

| <b>Proposed development</b>  |   |   |
|--|---|---|
| <b>What type of development is proposed? Please provide further details of the type of residential / employment / cultural / retail or mixture of uses proposed.</b> | Residential   | Approximately 157 flats                           |
|  | Employment / Industrial   |   |
|  | Retail / commercial   | Approximately 440 sq.m                            |
|  | Office  |   |
|  | Arts and culture  |   |
|  | A mixture of types  |   |
|  | Other (please specify)  | Community/health facility: approximately 700 sq.m |
| <b>Please tell us more about the proposed type of development...</b>   | <p>Comprehensive redevelopment of the site. The building will be arranged around a central podium courtyard with a taller building at the corner of Green Lanes and the North Circular Road. A single storey podium will provide amenity space for residents with undercroft parking and servicing below.</p> <p>A 700 sq.m health centre will be provided fronting onto the North Circular Road. This has been designed in-line with design specifications of the Enfield Clinical Commissioning Group.</p> <p>A variety of retail/commercial units (approximately 440 sq.m) will be provided on the Green Lanes frontage.</p> <p>The proposed building is 16 storeys in height on the corner of Green Lanes and the North Circular Road, dropping down to six and three storeys along the North Circular Road and seven and five storeys on Green Lanes. The transition in heights will ensure an appropriate relationship with neighbouring properties.</p> <p>Pre-application advice received in October 2018 (ref: 18/01206/PREAPP) supported the principle of the comprehensive development of the site, the proposed uses and the overall design approach. Whilst further work is required on the detailed design, and the development would need to be of exceptional design quality, it is considered that the scheme forms an appropriate basis for a residential-led mixed use allocation within the new Local Plan.</p> |   |

**What is the potential capacity of the site? (Please provide approximate dwelling numbers and densities or approximate floorspace for employment / office development)**

- Approx. 157 flats (81 x one bed, 76 x two bed units)
- Approx.. 440 sq.m of retail/commercial floorspace
- Approx. 700 sq.m of community/health facility floorspace
- Approx. 32 car parking spaces

Residential density: 523 units per ha.

| Site details  |   |  |  |
|---|---|--|--|
| <b>Does the site have direct access to the existing highway network?</b>  | Yes X   | Further comment:<br><br>Onto Green Lanes and Sidney Avenue |  |
|   | No  |  |  |
| <b>What access is there in terms of public transport?</b>   | Bus stop  | X  | Distance in Km: 0.04 km                |
|   | Railway / tube station  | X  | Distance in Km: 0.7 km (Palmers Green) |
| <b>Are there any known constraints to the site? (access difficulties, ground conditions, contamination, flood risk, legal issues or any others)</b> | <p>Nos. 147 to 149 Green Lanes are outside of Notting Hill Genesis' ownership.</p> <p>The access road to the rear of the Green Lanes terrace is currently unregistered and the ownership of it is not known.</p>  |  |  |
| <b>Are there any known environmental constraints on, or in close proximity to the site? (i.e. Green Belt, Metropolitan Open Land, Biodiversity)</b> | No.   |  |  |
| <b>Has any work been done on the promotion of the site? (e.g. legal reports, traffic surveys, ecology reports etc)</b>                              | <p>Pre-application advice had been received on the proposal, with officers supporting the principle of the development and overall design approach (ref: 18/01206/PREAPP). No technical assessments have otherwise been undertaken.</p> <p>This study was also submitted as part of the Dec 2018 to Feb 2019 'Call for Sites' consultation.</p> |  |  |
| <b>Are any of the following services available on or to the site?</b>   | Water   | Yes  |  |
|   | Electricity   | Yes  |  |
|   | Gas   | Yes  |  |
|   | Foul sewer  | Yes  |  |
|   | Surface water sewer   | Yes  |  |

|  |                     |     |  |
|--|---------------------|-----|--|
|  | Broadband           | Yes |  |
| <b>Does the proposed site require amendments to existing services?</b> | Water               | Yes |  |
|  | Electricity         | Yes |  |
|  | Gas                 | Yes |  |
|  | Foul sewer          | Yes |  |
|  | Surface water sewer | Yes |  |
|  | Broadband           | Yes |  |

| <b>Delivery and timing</b>  |            |
|---|------------|
| <b>Broadly, when do you think that the site could become available for the commencement of development?</b> |            |
|   | 5-10 years |
|   |            |
|   |            |



## Any other relevant information

### Please provide any other relevant information below:

As outlined above, pre-application advice received in October 2018 (ref: 18/01206/PREAPP) supported the principle of the comprehensive development of the site, the proposed uses and the overall design approach. Whilst further work is required on the detailed design, and the development would need to be of exceptional design quality, it is considered that the scheme forms an appropriate basis for a residential-led mixed use allocation within the new Local Plan.

1-7 Bowes Road is currently allocated for residential development within the North Circular Area Action Plan (NCAAP, Site 18) as a small housing opportunity site. The Council's Policy Map designates 141-161 Green Lanes as being part of a Local Centre. 161 Green Lanes forms part of Enfield's Local Heritage List.

We also note that the site immediately to the north is also allocated within the NCAAP (Site 16). This site is also within Notting Hill Genesis' ownership and has been subject to a separate response to the Call for Sites. NCAAP Sites 17 and 19 are also next to the junction of Green Lanes with the North Circular Road.

Whilst there are a variety of buildings and uses on the site, it is considered that it is largely underused and in poor condition. The site has good public transport accessibility and is located within a Local Centre. It is therefore considered that there is potential to redevelop the site to achieve greater residential density and to provide new commercial and health facilities, benefiting the Local Centre and community.

Whilst the proposed building is taller than surrounding buildings, the site is located on a key junction in a local centre with a good level of public transport accessibility. The tallest element is located to the north east of the site and the height will transition down to the west and south.

The site's urban location and the limited ability to provide car parking, and outdoor amenity space and playspace, means that the site is better suited to a mix of smaller units that will complement the family housing prevalent in the wider area, in accordance with the draft London Plan, which seeks to optimise development of sites with good public transport accessibility (Policy D6, Optimising density) and for car-free development (Policy T6, Car Parking).

Whilst 161 Green Lanes is included in the Enfield Local Heritage List (September 2017) and is therefore a non-designated heritage asset the proposal would replace this building to deliver residential units and enhanced commercial spaces. It is considered that the benefits delivered by the proposal will outweigh the loss of this building and the parade, in particular the provision of new residential units, modern commercial units and enhancements to the local centre. The retention of the existing buildings would severely constrain any development and limit the number of new residential dwellings that could be provided. Furthermore, the existing building will be replaced by a high quality building that will act as a local landmark to the local centre and positively contribute to local character.

The proposed development would be visible from neighbouring properties surrounding the site and the submitted design has sought to minimise the impact upon these neighbours. The scheme has been designed in such a way to ensure that the development would respect the amenity of adjoining occupiers and would not lead to any harmful loss of privacy or outlook.

Overall the proposed development will deliver significant benefits to the area by bringing vacant and underused sites back into active use, delivering a new health facility and commercial units, providing new residential accommodation and a high quality design that will enhance the local centre. The

massing and elevation treatment will complement the local townscape whilst protecting the amenity of adjoining residential units.

It is therefore considered that the existing site allocation (Site 18) should be extended to support the comprehensive development of the site.

### Future updates

Please tick this box if you do not wish to be added to our contact list and be updated about future progress on the Local Plan and other planning policy updates.

X

# SITE ANALYSIS

## LOCATION

The collective sites are comprised of three separate but closely located parcels of land. These are situated within the Bowes Ward of the London Borough of Enfield, bordering the Palmers Green Ward directly to the north.

The sites are located at the major intersection between Bowes Road (also known as the A404 / North Circular Road) and Green Lanes, and are bounded to the north by Bowes Road; to the east by Green Lanes; and to the south by Sidney Avenue. The sites have a combined total area of 0.287 hectares.

The sites fall within an area with PTAL rating 4, with good access to public transport including local and regional bus routes along Bowes Road and Green Lanes, and within walking distance of Bounds Green underground station on the Picadilly line and overground routes from Bowes Road and Alexandra Palace stations.

The sites are located within Flood Zone 1, which is the lowest risk definition.

## INDIVIDUAL SITES

For the purposes of distinguishing the component sites, we have labelled the three parcels Site A, Site B and Site C.

The largest of the parcels, Site A (1-7 Bowes Road) is principally located along Bowes Road, with a stretch of frontage onto the busy street, stretching back to Sidney Avenue to the south. It is approximately 0.155 hectares in size.

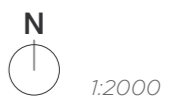
Site B (141-145 Green Lanes) is located at the junction of Green Lanes and Sidney Road, and is approximately 0.042 hectares in size.

Site C (151-161 Green Lanes) is located at the junction of Bowes Road and Green Lanes, and is approximately 0.092 hectares in size.

The sites are separated by two areas of land under different ownership; nos 147-149 Green Lanes, which are two properties along Green Lanes separate sites B and C, and a strip of land with unknown ownership, in the form of a rear access road, separates sites B and C from site A.

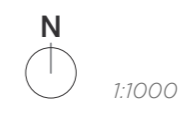


▲ Site & Local Area - Aerial View (source: Google Maps)





▲ Site & local area - plan and walking distances



# SITE ANALYSIS

## SITE A

Site A comprises vacant, disused land stretching between Bowes Road in the north and Sidney Avenue in the south.

There are three distinct parts to the site; the first is a broadly rectangular section with an approximately 34m long stretch of frontage directly onto Bowes Road, which is bounded by a metal palisade fence with no gated access, and which is overgrown and containing what appear to be self-seeded trees. The rear of this site partially backs onto the rear gardens of houses along Sidney Avenue.

The second element is a smaller rectangular parcel of land which appears to have been incorporated into the site from the rear gardens of Nos. 2 and 4 Sidney Avenue. This area of the site is also bound by a fence, but this is not secure, and the area has suffered from fly-tipping.

The southernmost part of Site A connects the site to Sidney Avenue with a thin strip of land alongside the flank wall of No. 2 Sidney Avenue. Similarly to the adjoining land to the north, this land is affected by fly-tipping and abandoned vehicles.

## SITE C

Site C comprises a terrace of six shopfront properties at 151-161 Green Lanes, along with land and extensions to the rear of the terrace. The properties are in various states of occupancy and condition. They contain flatted accommodation on the upper floors. The properties form the northern end of a red brick terrace dating to 1911, and which maintains its original detailing albeit in a poor condition.

The corner property at 161 Green Lanes has a shopfront which is included on the Enfield Local Heritage List (September 2017). This document states that much of the original shopfront appears to remain, albeit underneath more modern interventions of timber and tile cladding.

The rears of all the properties have been extended in a piecemeal, haphazard manner, including single storey garages and outbuildings with single ply roofs. The quality of the public realm here is very poor, with no visual amenity and poor security, lighting and overlooking.

## SITE B

Site B comprises the properties and adjoining land at 141-143 and 145 Green Lanes.

No. 145 is the southernmost building in the terrace of shopfront properties (of which Site B forms the northern part). As with the properties in Site B, the rear has been extended with a single storey vehicle garage.

No 141-143 is located on the corner of Green Lanes and Sidney Avenue. It is occupied by a single storey building housing Green Lane Tyres, a vehicle parts and servicing shop, including a forecourt car park fronting onto Green Lanes.

## LAND OUTSIDE OF NHH OWNERSHIP

There are two parcels of land outside of the client's ownership which separate the three sites.

- Parcel D - nos. 147-149 Green Lanes, separating Sites B and C within the shopfront terrace, each under separate ownership.
- Parcel E - land and access road to the rear of Green Lanes terrace, running from Sidney Avenue to Bowes Road, of unknown ownership, separating Site A from Sites B and C.





1:500

# SITE ANALYSIS



01 / View from Bowes Road looking west



02 / View along the internal access road looking south



03 / Green Lanes terrace



04 / Green Lanes terrace



05 / Green Lanes terrace



06 / Building opposite Green Lanes terrace



07 / Building opposite site C on Sidney Avenue



08 / Site C at the corner of Green Lanes and Sidney Avenue



09 / View looking east along Sidney Avenue



10 / View from Sidney Avenue looking north along access road



11 / View of the entrance to the access road



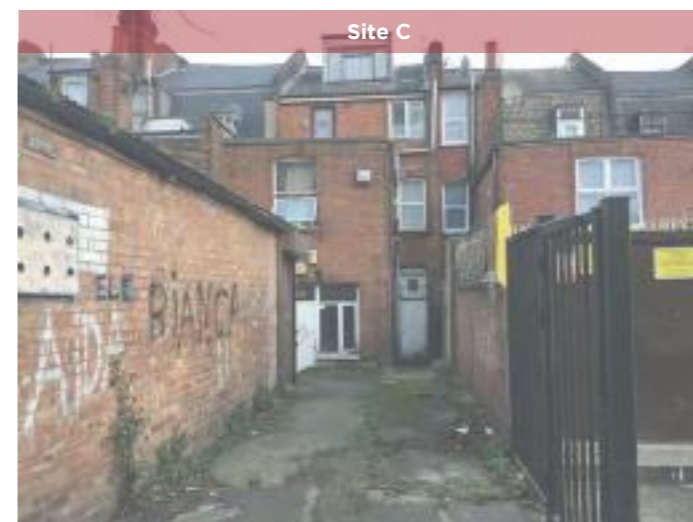
12 / Access road and the rear of Green Lanes terrace



13 / Site A at the rear of Sidney Avenue gardens



14 / Properties at the rear of Green Lanes terrace



15 / Properties at the rear of Green Lanes terrace



# SITE ANALYSIS

## VEHICLE AND PEDESTRIAN ACCESS

The sites have the opportunity to become highly permeable and accessible, with the potential for access and active frontage from the north at Bowes Road, the east along Green Lanes and the south along Sidney Avenue.

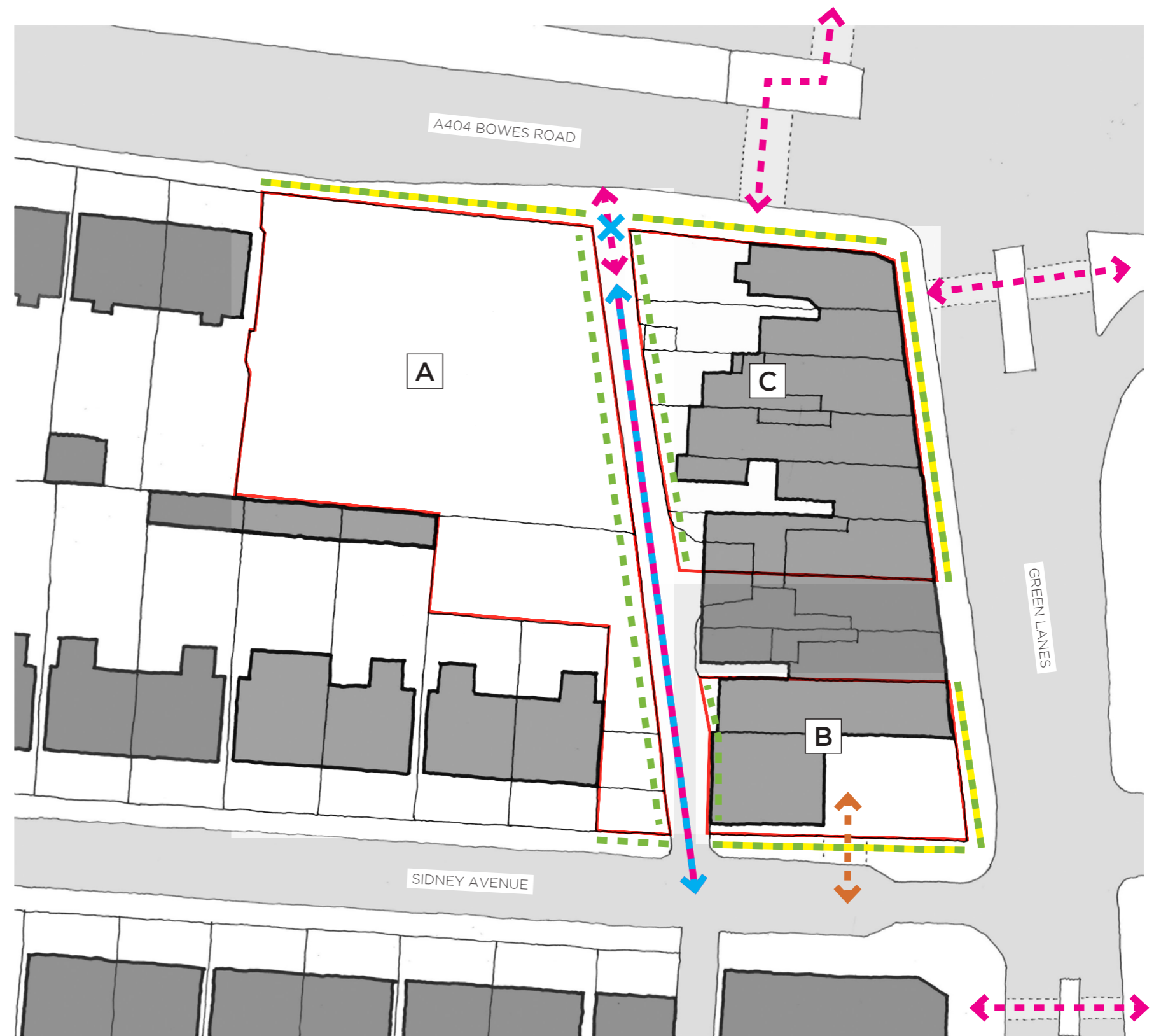
The existing back route which runs to the rear of the Green Lanes terrace allows the opportunity to create a vehicular and pedestrian route from Sidney Avenue for access and servicing to the sites. The northern end of this route is permeable to pedestrians but at present vehicles are unable to cross onto Bowes Road. Creating a new vehicle link through here is considered unfeasible; as such the internal access road will require sufficient space for vehicles to turn and leave via the same entry point on Sidney Avenue.

There is an existing vehicle entry point from Sidney Avenue to the forecourt on site B; it is proposed that this access and the forecourt will be removed as part of the redevelopment.

## ACTIVE AND COMMERCIAL FRONTAGE

Where sites are bounded by external roads of the internal access link, the design of the scheme should maximise active frontage to create activity, and in the case of the internal access road to provide passive surveillance and security.

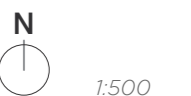
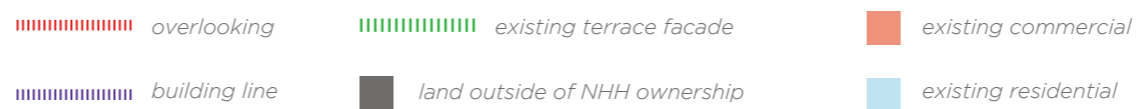
Along the external perimeter of the sites on Bowes Road, Green Lanes and Sidney Avenue, there is ample opportunity to create new and improve existing commercial frontage. A reinvigoration of the high street frontage along Green Lanes will improve the public realm and the quality of the urban environment. Along Bowes Road, new frontage for either commercial or public amenity use (such as a D1 use health facilities, to be discussed in the Development Brief section of this document) can improve this currently underused and inhospitable street environment.



- - - - - ➔ pedestrian link
- - - - - ➔ vehicle link
- - - - - ➔ combined pedestrian / vehicle
- - - - - ➔ existing vehicle entrance to be removed
- - - - - active frontage potential
- - - - - - - - - - commercial frontage potential

## CONSTRAINTS

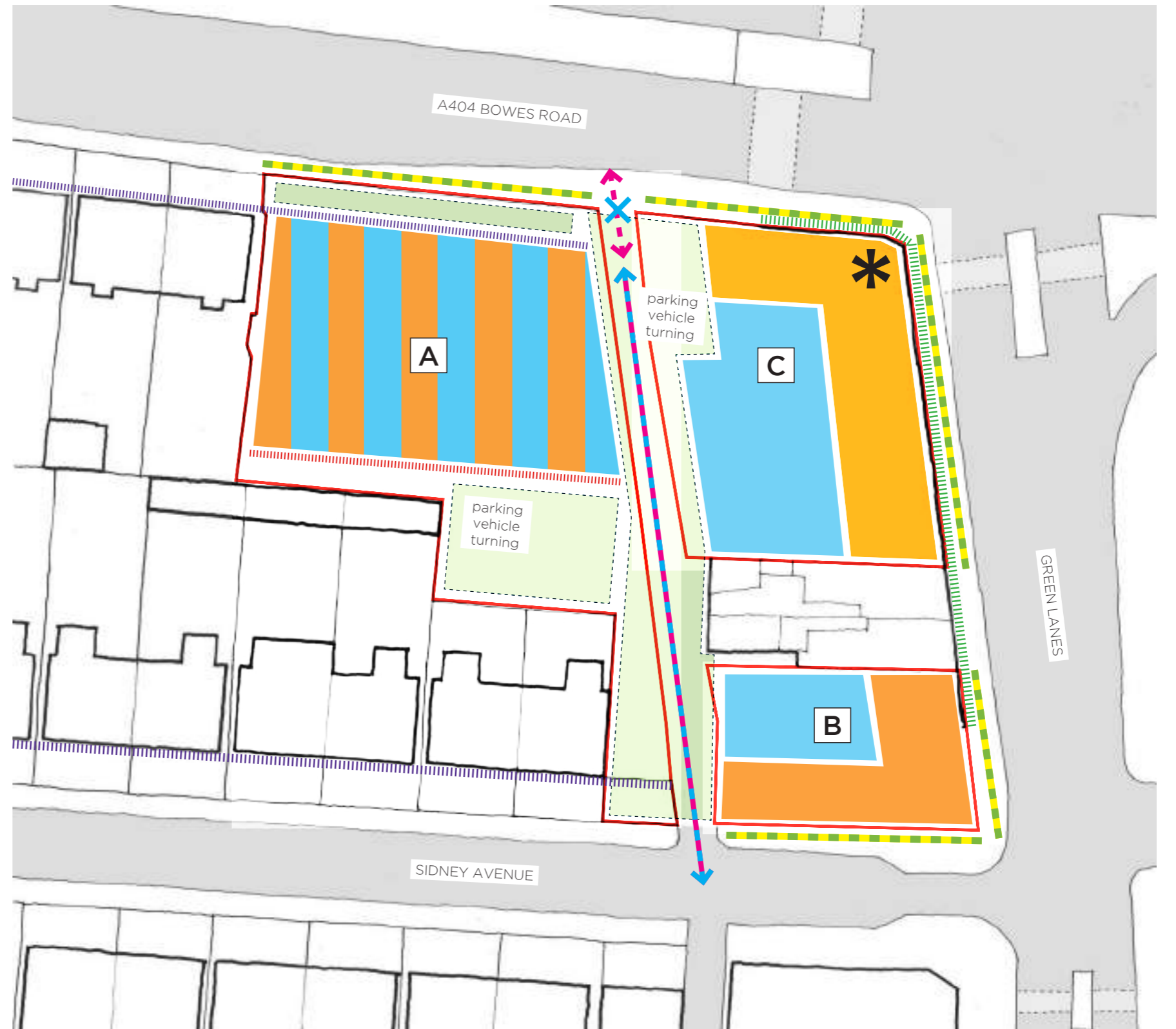
- The main constraint on comprehensive development is the separation of the sites by land outside of Notting Hill Housing's ownership, at the rear of the Green Lanes terrace and the properties at 147 and 149 Green Lanes. This represents an impediment to any cohesive structures or development spanning between or across the collective sites.
- There are existing building lines along Bowes Road and Sidney Avenue, which serve to indicate the preferred extent of new building lines for any proposed development.
- Residential properties along Sidney Avenue have windows to the rear which overlook Site A. It is considered that 18 metres would be an appropriate distance between neighbouring windows given the site's urban location.
- The existing Green Lanes terrace facade has some aesthetic merit as a single cohesive element. Redevelopment of the sites may include the retention or reinterpretation of the terrace facade depending on viability and design development.



# SITE ANALYSIS

## OPPORTUNITIES

- Although outside of Notting Hill Housing's ownership, the red line boundary for the application could include the existing rear access road and development can include public realm improvements to create a shared surface for pedestrians and vehicles. This can include vehicle parking and turning spaces for vehicles, including service vehicles and those serving any commercial or D1 use buildings.
- There is the opportunity to create an improved commercial frontage and streetscape along Green Lanes and Sidney Avenue.
- Development on Site A will create new frontage and activity onto Bowes Road.
- Above ground floor, all sites have the opportunity to accommodate new residential development. Ancillary uses can be incorporated internally to the development, and main entrances and windows overlooking the internal access road can create activity and enhance passive surveillance.
- The corner of Bowes Road and Green Lanes on Site C is a highly prominent location, which offers the opportunity for enhanced height and massing.



1:500

# DEVELOPMENT BRIEF

## DEVELOPMENT CONTEXT

The sites are part of a wider programme of residential-led development delivery for Notting Hill Housing, as set out in the document 'A New Vision for the North Circular Road'.

This has involved the regeneration of a number of sites along or adjacent to the North Circular Road which were formerly owned by Transport for London, and were sold to Notting Hill Housing in 2009.

The development is being undertaken in four phases. The first three phases are either completed or are under way; a summary of this development is shown opposite.

The application sites are in the fourth phase, and represent the final parcels of land to be brought forward to complete the regeneration.

| PHASE   | PROPOSAL  | STATUS   |
|---------|---|--|
| Phase 1 | <b>Refurbishment of existing properties:</b><br>258 existing properties refurbished and where vacant brought back into use.   | Completed  |
| Phase 2 | <b>Regeneration of smaller sites:</b><br>Providing 55 new homes across five sites through infill development of underutilised land.   | Completed  |
| Phase 3 | <b>Regeneration of larger sites:</b><br>Providing 238 new homes across three sites. Including 250sqm of non-residential space leased to a local care charity.   | NCR Site 11 - completed<br>NCR Site 14 - completed<br>NCR Site 6 - awaiting handover   |
| Phase 4 | <b>Strategic development sites:</b><br>Potential to deliver mixed use redevelopment and meet infrastructure requirements at Ritz Parade and Green Lanes. Including commercial/retail, health, leisure and community uses. | 188-200 Bowes Road - planning application submitted<br>Green Lanes - Liaison and consultation required with relevant stakeholders. |

▲ North Circular Road Vision - Phase Masterplan



▲ North Circular Road Vision Document



▲ North Circular Road Vision - Phase Masterplan including application site

## ENFIELD PLANNING POLICY - NCAAP

Parts of the site have policy designation within the North Circular Area Action Plan (NCAAP, adopted 2014), which details the basis for which future planning and development should be brought forward along the A406 North Circular Road. Overall the sites within the NCAAP are identified to deliver approximately 1,400 new homes alongside community use facilities in the period up to 2026.

In the Area Action Plan, the vacant northern part of Site A is allocated as Opportunity Site 18 (Green Lanes Junction SW). The site is identified for residential use.

Sites B and C are outside of any specific site designations, but are identified as part of the 'Local centre / retail parade' along Green Lanes.

The following page indicates

Page 35 of the NCAAP makes reference to the desire for the provision of modern healthcare facilities being brought forward to serve the local community. It states:

**“Health uses are appropriate in district and local centre locations and areas with good levels of public transport accessibility...”**

**“...the Council will... continue to work with its health service and health care partners to ensure any need for additional health care services are addressed in conjunction with new developments as they come forward.**

**...Health service providers feel that there is currently poor access to primary care services in the Bowes area and consider that new facilities offering a range of health services should be provided.”**

Notting Hill Housing wish to explore the inclusion of health facilities in the proposals for the Green Lanes sites, which are considered a highly appropriate location because they meet the criteria of being in a local centre with a high public transport accessibility level.



▲ Part of the NCAAP site allocations plan (NCAAP p29)

### Opportunity sites:

1. Ladderswood Estate site
2. Western Gateway site A
3. Western Gateway site B
4. Western Gateway site C
5. Land adjacent to New Southgate Station
6. Coppicewood Lodge site
7. Arnos Grove Station sites
8. Arnos Pool, Bowes Road Library and Arnos Grove Medical Centre
9. Telford Road sites
10. Bowes Road/Telford Road junction sites
11. Bowes Road/Wilmer Way junction sites
12. Ritz Parade
13. Bowes Road sites
14. Southgate Town Hall
15. Green Lanes north site
16. Green Lanes/Elmdale Road site
17. Green Lanes/North Circular Road site
18. Bowes Road south site
19. Old Labour Exchange site
20. Birchwood Court site

Opportunity site

AAP boundary

Neighbourhood places boundaries (indicative only)

### Local Plan Proposals Map allocations:

Local centre / retail parade

Major centre

Locally significant industrial site (LSIS)

Regeneration Priority Area

Local open space

Metropolitan open land

Site of Borough importance for nature conservation

Site of local importance for nature conservation

Site of metropolitan importance for nature conservation

Wildlife corridor (diagrammatic)

Green chain missing link

# DEVELOPMENT BRIEF



Fig 25. Green Lanes - opportunity sites  
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- 14. Southgate Town Hall
  - 15. Green Lanes north site
  - 16. Green Lanes/Elmdale Road site
  - 17. Green Lanes/North Circular Road site
  - 18. Bowes Road south site
  - 19. Old Labour Exchange site
  - 20. Birchwood Court site
- AAP boundary
  - Opportunity site



Fig 26. Green Lanes - activities  
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- A. St Michael at Bowes Junior School
  - B. Tottenham Infant School
  - C. Trinity at Bowes Church & Buffer Bear N
  - D. The Darji Pavilion and Palmers Green M
  - E. Southgate Town Hall site
  - F. Palmers Green Baptist Church
  - G. St Anne's High School, Upper Site
  - H. Green Lanes
  - I. Green Lanes north
  - J. Palmers Green
  - K. Tottenham Road parade
  - L. Regents Avenue Industrial Estate
  - M. Travis Perkins site
- Industrial
  - Commercial
  - Community
  - AAP Boundary
  - Opportunity site



Fig 27. Green Lanes - townscape  
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- Point of transition
- AAP boundary
- Opportunity site
- Positive frontage
- Neutral frontage
- Negative frontage



Fig 30. NCAAP Site Proposals  
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- 14. Southgate Town Hall
  - 15. Green Lanes north site
  - 16. Green Lanes/Elmdale Road site
  - 17. Green Lanes/North Circular Road sit
  - 18. Bowes Road south site
  - 19. Old Labour Exchange site
  - 20. Birchwood Court site
- Opportunity site
  - Flats with commercial ground floor f
  - Flats
  - Houses
  - Mews houses
  - AAP boundary

# DEVELOPMENT PROPOSALS

# Comprehensive Development including land outside NHH ownership.

Site area = 0.340 ha

| TOTAL RESIDENTIAL<br>(16 storeys) |       |     |             |
|-----------------------------------|-------|-----|-------------|
| Occupancy                         | Units | HR  | Mix (Units) |
| 1B 2P                             | 81    | 162 | 51.5%       |
| 2B 3P                             | 6     | 18  | 4%          |
| 2B 4P                             | 70    | 210 | 44.5%       |
| .....                             |       |     |             |
| Total                             | 157   | 390 | 100%        |

Resi NIA 9,677 m<sup>2</sup> (104,157 ft<sup>2</sup>)  
 Resi GIA 13,260m<sup>2</sup> (142,726 ft<sup>2</sup>)  
 Proposed Density: 462 u/ha  
 1,147 hr/ha

HEALTH CENTRE  
 .....  
 GIA 697 m<sup>2</sup> (7,500 ft<sup>2</sup>)

COMMERCIAL UNITS  
 .....  
 GIA 443 m<sup>2</sup> (4,770 ft<sup>2</sup>)

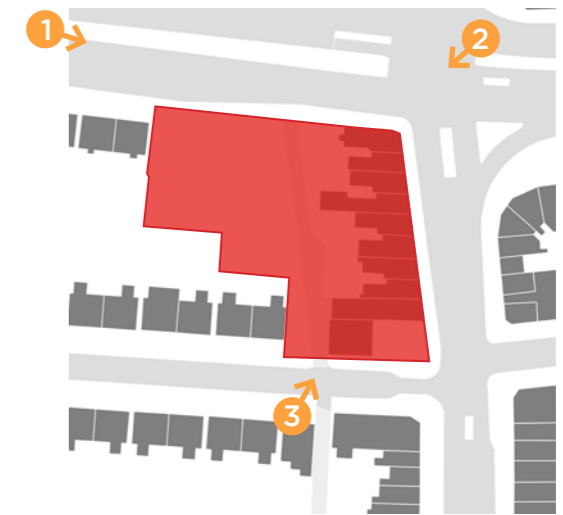
CAR PARKING SPACES 32

NOTES

- All areas are **approximate** and subject to change. Feasibility study for discussion only. Development is subject to Sunlight and Daylight assessments, Planning Permission, Building Control, Statutory Undertaker Searches and Assessment by a Structural Engineer.
- Unit and NIA totals do not include the following building support areas: concierge, post room, lobby, circulation, cycle store, plant and refuse.
- Site boundary is subject to Title Plan and only for feasibility study purposes.
- Winter gardens and integral balconies are included in the GIA according to RICS Code of Measuring Practice. Bolt on balconies are excluded.
- Winter gardens, integral balconies and bolt on balconies are part of the amenity space provision.

Option comprises replacement of the existing Green Lanes terrace with a comprehensive redevelopment that incorporates the area of the sites outside of Notting Hill Housing's ownership.

The building is arranged around a central podium courtyard to the rear with a taller building at the corner of Green Lanes and the North Circular Road. A single storey podium provides amenity space for the residents at first floor and undercroft parking underneath.



1/ View looking west east along Bowes Road





2/ View of the Bowes Road / Green Lane junction



3/ View along the internal street



GROUND FLOOR PLAN 1:500

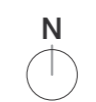


- Ancillary
- Commercial
- Health Centre





FIRST FLOOR PLAN 1:500



- 1B2P
- 1B2P WC
- 2B3P
- 2B4P
- 2B4P WC





SECOND FLOOR PLAN 1:500



- 1B2P
- 1B2P WC
- 2B4P
- 2B4P WC





THIRD FLOOR PLAN 1:500



- 1B2P
- 1B2P WC
- 2B3P
- 2B4P
- 2B4P WC





FOURTH FLOOR PLAN 1:500

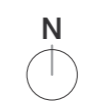


- 1B2P
- 1B2P WC
- 2B3P
- 2B4P
- 3B5P





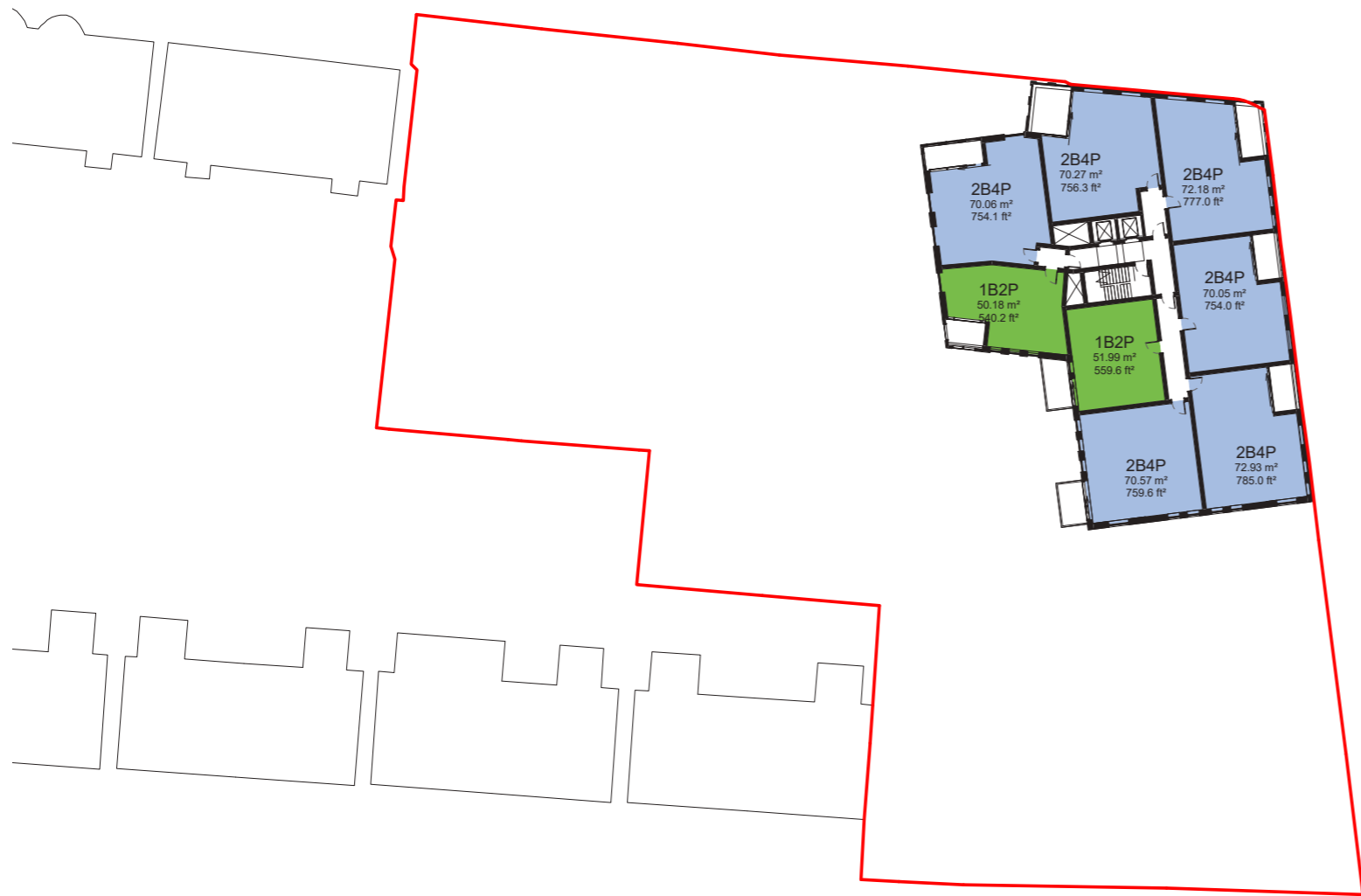
FIFTH FLOOR PLAN 1:500



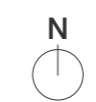
- 1B2P
- 1B2P WC
- 2B4P







SIXTH FLOOR PLAN 1:500



- 1B2P
- 2B4P





SEVENTH FLOOR PLAN 1:500

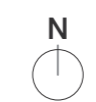


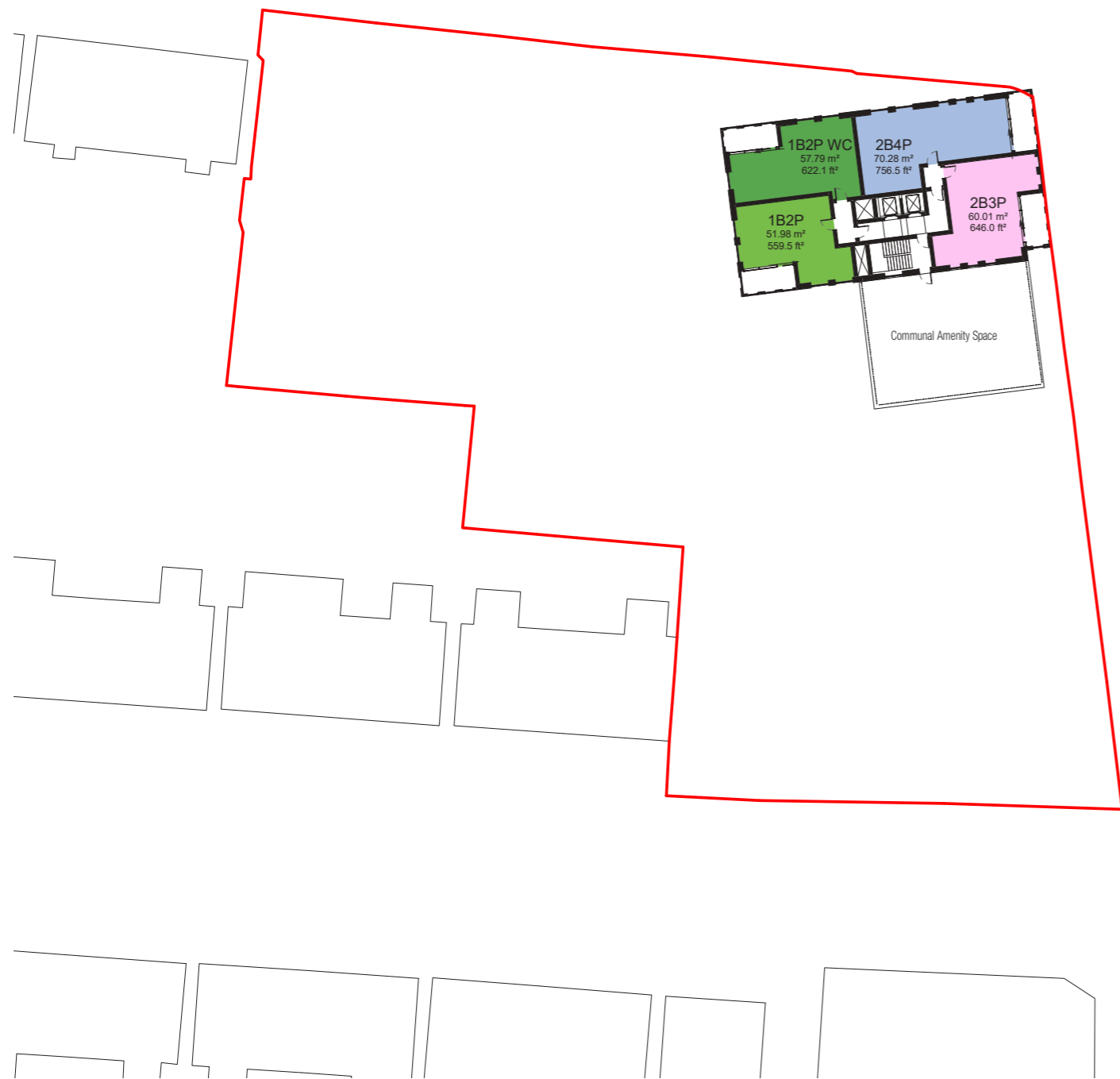
- 1B2P
- 1B2P WC
- 2B4P





**EIGHTH - THIRTEENTH FLOOR PLAN**  
1:500





**FOURTEENTH - FIFTEENTH FLOOR  
PLAN 1:500**



- 1B2P
- 1B2P WC
- 2B3P
- 2B4P





**Appendix C: NHG Call for Sites Representation, March 2020**

Ritz Parade, 140-186 Bowes Road, London, N11 2JG

## Call for sites submission form

As part of the plan making process the Council is undertaking a further 'Call for Sites' inviting anyone with an interest in land, potential sites and broad locations for development to submit these to us for consideration. We especially want proposals to come forward for small and medium sites for housing particularly in the built-up areas of Enfield.

For such brownfield sites the Council not only wants to be able to identify the land or buildings themselves, we also want to be able to understand the schemes that are being proposed. This will help us to assess the capacity and deliverability of such sites, and whether they are available, suitable and viable. These sites will then be assessed and if deliverable will be consulted upon in the next stage of the Local Plan.

Please complete a submission form for each individual site you are submitting and include a site location plan (preferably an OS Map), clearly showing the boundaries of the site outlined in red (or otherwise clearly marked). The map should show at least two named roads, to ensure that the site can be correctly identified. A postcode would also help to locate the site, even where this relates to adjacent land or buildings.

Sites should be capable of delivering one or more residential dwellings.

**The deadline for all responses is 5pm on Friday 6 March 2020.**

Responses received after the deadline can only be accepted in exceptional circumstances. If you use the Council's online consultation portal, you will receive an automatic message to confirm receipt of your response and you can also view all comments that have been made.

Representations cannot be made anonymously, so please provide your full name and contact details. Please note that representations will be made publicly available, along with your name.

Please complete to your knowledge a separate form for each site and return by email to: [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk) quoting 'Call for sites' in the subject field.

If you do not have internet access, you can post your response to:

Strategic Planning and Design Team, Enfield Council, FREEPOST, NW5036, EN1 3BR

Or telephone 020 8379 3866

Thank you

## Enfield's draft new Local Plan 2036

### Call for Sites 2020 Submission Form

| Contact details                   |  |                            |   |
|-----------------------------------|--|----------------------------|---|
| <b>Name:</b>                      | Danielle Lennon  |                            |   |
| <b>Organisation:</b>              | Notting Hill Genesis   |                            |   |
| <b>Address:</b>                   | Bruce Kenrick House, 2 Killick Street, London                              |                            |   |
| <b>Postcode:</b>                  | N1 9FL   |                            |   |
| <b>Telephone:</b>                 | 0203 815 0158  |                            |   |
| <b>Email:</b>                     | <a href="mailto:danielle.lennon@nhg.org.uk">danielle.lennon@nhg.org.uk</a> |                            |   |
| <b>Your interest in the site:</b> | I am a...  | Developer                  | X |
|                                   |  | Freeholder                 | X |
|                                   |  | Leaseholder                |   |
|                                   |  | Resident                   |   |
|                                   |  | Potential purchaser        |   |
|                                   |  | Community group            |   |
|                                   |  | Planning consultant        |   |
|                                   |  | Registered social landlord |   |
|                                   |  | Other (please specify)     |   |

| Site details                                  |   |                                     |    |
|---|---|-------------------------------------|----|
| <b>Site address (or location)</b>             | Ritz Parade, 140 – 186 Bowes Road, London, N11 2JG  |                                     |    |
| <b>Site area in hectares or square metres</b> | 6,000 sq.m  |                                     |    |
| <b>Site location plan submitted?</b>          | Yes   | <input checked="" type="checkbox"/> | No |
| <b>Current or most recent use of the site</b> | <p>156 – 172 &amp; 176 – 186 Bowes Road are comprised of two/three storey commercial/retail buildings.</p> <p>174 Bowes Road is an Assembly Hall occupied by the Jehovah’s Witnesses. It is an L-shaped building that extends to the rear of Nos. 176 – 186.</p> <p>140 – 154 Bowes Road is undeveloped land.</p> <p>To the rear of 156 – 174 Bowes Road is a car park used by the Jehovah’s Witnesses.</p> |                                     |    |



| Ownership of the site  |            |  |    |   |  |
|--|------------|--|----|---|--|
| <b>Please provide details of landownership/land interests if known</b>                           | Freeholder |  |    |   |  |
| <b>Are all the above owners/those with a land interest aware of this submission of the site?</b> | Yes        |  | No | X | <b>If 'No' please give reasons</b><br><br>The majority of tenants are on short term leases. All tenants are aware of Notting Hill Genesis' intention to develop the site in the future and of the draft Ritz Parade Development Brief. |

| <b>Proposed development</b>  |  |                                 |
|--|--|---------------------------------|
| <b>What type of development is proposed? Please provide further details of the type of residential / employment / cultural / retail or mixture of uses proposed.</b>         | Residential  | Approx. 105 residential units   |
|  | Employment / Industrial  |                                 |
|  | Retail / commercial  | Approx. 950 sq.m                |
|  | Office   |                                 |
|  | Arts and culture   |                                 |
|  | A mixture of types   |                                 |
|  | Other (please specify)   | Community Use: Approx. 230 sq.m |
| <b>Please tell us more about the proposed type of development...</b>   | Comprehensive development of the site to provide a mixed use scheme comprising re-provided retail/commercial and community uses, and 105 residential units.      |                                 |
| <b>What is the potential capacity of the site? (Please provide approximate dwelling numbers and densities or approximate floorspace for employment / office development)</b> | Approximately: <ul style="list-style-type: none"> <li>105 residential units</li> <li>950 sq.m retail/commercial space</li> <li>230 sq.m community use</li> </ul> |                                 |

| Site details  |   |   |  |
|---|---|---|--|
| <b>Does the site have direct access to the existing highway network?</b>  | Yes X   | Further comment:<br>North Circular Road |  |
|   | No  |   |  |
| <b>What access is there in terms of public transport?</b>   | Bus stop  | X                                       | Distance in Km: Immediately to the front of the site                               |
|   | Railway / tube station  | X                                       | Distance in Km: 0.7 km to Arnos Grove tube station<br>0.8 km to Bowes Park station |
| <b>Are there any known constraints to the site? (access difficulties, ground conditions, contamination, flood risk, legal issues or any others)</b> | N/A   |   |  |
| <b>Are there any known environmental constraints on, or in close proximity to the site? (i.e. Green Belt, Metropolitan Open Land, Biodiversity)</b> | Small areas of the site along the northern boundary are within Flood Zone 2. The remainder of the site is in Flood Zone 1.  |   |  |
| <b>Has any work been done on the promotion of the site? (e.g. legal reports, traffic surveys, ecology reports etc)</b>                              | Draft Ritz Parade Development Brief, prepared by the London Borough of Enfield.<br><br>This study was also submitted as part of the Dec 2018 to Feb 2019 'Call for Sites' consultation. |   |  |
| <b>Are any of the following services available on or to the site?</b>   | Water   | Yes                                     |  |
|   | Electricity   | Yes                                     |  |
|   | Gas   | Yes                                     |  |
|   | Foul sewer  | Yes                                     |  |
|   | Surface water sewer   | Yes                                     |  |

|  |                     |     |  |
|--|---------------------|-----|--|
|  | Broadband           | Yes |  |
| <b>Does the proposed site require amendments to existing services?</b> | Water               | Yes |  |
|  | Electricity         | Yes |  |
|  | Gas                 | Yes |  |
|  | Foul sewer          | Yes |  |
|  | Surface water sewer | Yes |  |
|  | Broadband           | Yes |  |

**Delivery and timing**

**Broadly, when do you think that the site could become available for the commencement of development?**

5-10 years

## Any other relevant information

### Please provide any other relevant information below:

The proposal is for the comprehensive development of Ritz Parade, the Jehovah's Witnesses' Assembly Hall, the current rear car park and the undeveloped land to the south of Powys Court. The development is comprised of five storey blocks fronting onto the NCR with taller buildings (five to seven storeys) to the rear. Commercial and community uses would be located at ground level fronting onto the NCR.

The proposal would comprise approximately 105 residential units, 950 sq.m of commercial floorspace and 230 sq.m of community space.

### Background

Ritz Parade forms part of the Bowes Road Local Centre. The site has good public transport accessibility with the North Circular Road served by a number of bus routes, and Arnos Grove and Bowes Park stations a short walk away.

The undeveloped land at 140 - 154 Bowes Road and the car park to the rear of 156 – 172 form part of an existing site allocation within the North Circular Area Action Plan (NCAAP, Site 12) for 'retail with flats above'. In November 2015 the Draft Ritz Parade Opportunity Site Development Brief was published, which proposed the comprehensive development of the entire parade. A second option retained the former Ritz Cinema, (147 Bowes Road) which is currently used as a Jehovah's Witnesses' Assembly Hall.

In May 2018 the Ritz Parade, including the Jehovah's Witnesses' building was included on the Council's Local Heritage List. Nevertheless, it is considered that the design principles set out within the Draft Ritz Parade Opportunity Site Development Brief remain relevant. Furthermore, in August 2018 the site immediately to the west, 188-200 Bowes Road, which also forms part of site NCAAP Site 12, received resolution to grant from Enfield's planning committee for the mixed use redevelopment to provide 86 flats and ground floor commercial space (ref: 18/00388/OUT). This established a building typology of four storeys blocks, with commercial uses at ground floor and residential above, fronting onto the North Circular Road with buildings of six and seven storeys to the rear.

### Assessment

Large parts of the site are undeveloped with the remainder underutilised. The proposed development, which is in-line with the principles established within the NCAAP and the Draft Development Brief, would deliver high quality new buildings, replacement commercial and community floorspace and 105 new residential dwellings. These uses would significantly enhance the Bowes Road Local Centre, and benefit local businesses and the local community.

The proposal continues the design principles established by the approved scheme at 188 – 200 Bowes Road, with the tallest elements to the north of the site, set back from the North Circular Road. The heights and massing have been designed to protect the amenity of adjoining dwellings and ensure a high quality residential environment. Furthermore, draft London Plan Policy D6 (Optimising Density) outlines that development must make the most efficient use of land and be designed at the optimum density. Paragraph 3.6.3 of the supporting text outlines that in general, the higher the public transport access and connectivity of the site, and the closer it is to a town centre or station, the higher the density and car parking provision should be.

Whilst the comprehensive development of the site would deliver significant benefits in terms of housing delivery and an integrated design approach, there may be the option to retain certain buildings as part of the development. The ethos guiding the development of the site will be of a high quality design that will enhance the Local Centre.

30 car parking spaces are proposed although we note that draft London Plan Policy T6 (Car Parking) outlines that the development of sites with good public transport accessibility car-free development should be the starting point for all development proposals.

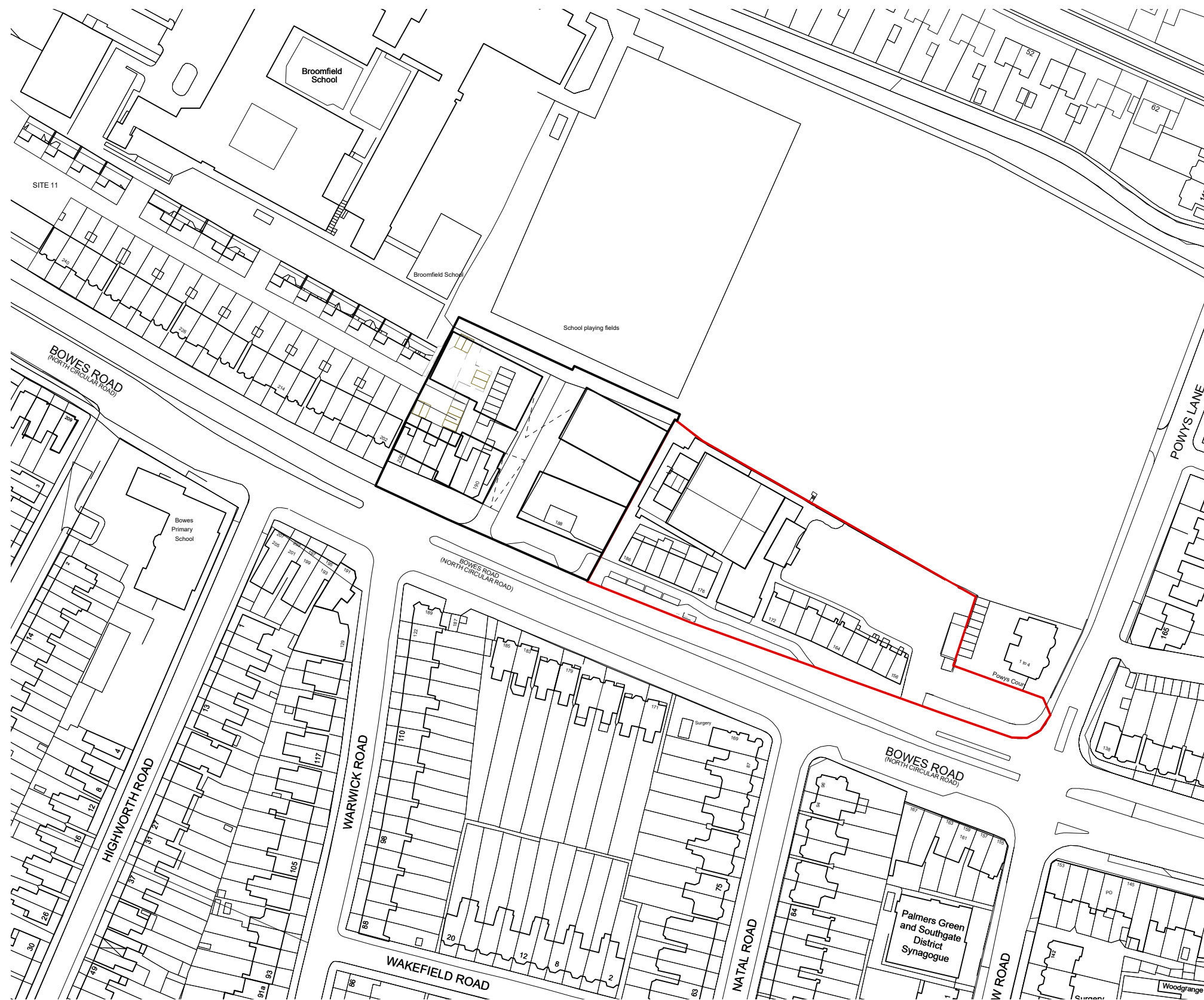
Overall, the principle of the comprehensive mixed use development is considered to be acceptable. The design feasibility undertaken has demonstrated that a high quality residential environment can be delivered whilst protecting the amenity of neighbouring buildings.

Therefore it is considered that within the new Local Plan the existing site NCAAP allocation for Site 12 be extended to cover the entire site area and be updated to reflect the optimised development of the site.

#### Future updates


Please tick this box if you do not wish to be added to our contact list and be updated about future progress on the Local Plan and other planning policy updates.


X



KEY











 Adjacent Site  
 18/00388/OUT  
 Mixed Use approved  
 86 Units  
 Approx 525 SQM  
 commercial space

 Site Boundary  
 144 - 156 Bowes Road  
 including land next to  
 Powys Court



KEY



-  Adjacent Site  
18/00388/OUT  
Mixed Use approved  
86 Units  
Approx 525 SQM  
commercial space
-  Site Boundary  
144 - 156 Bowes Road  
including land next to  
Powys Court  
Approx 6'000 SQM
-  950 SQM of Commercial  
Use
-  30 Parking spaces
-  105 Residential Units
-  Planter and Green Roof
-  Refuse/Plant Room
-  230 SQM of Community  
Space





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