

North Circular Area Action Plan

Towards the Pre-submission Stage

Part of Enfield's LDF



November 2011

Allies and Morrison
Urban Practitioners

have your
say!



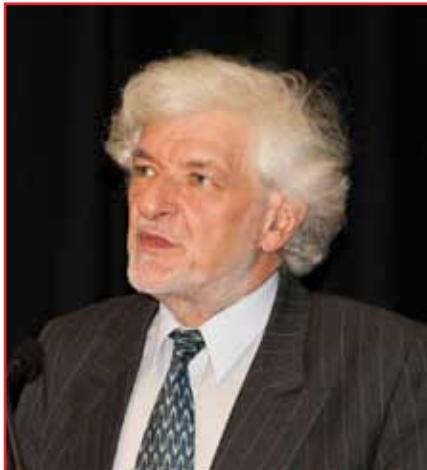


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FOREWORD



I am pleased to publish this consultation paper on the future of the area around the North Circular Road. This document marks an important step towards building a formal planning framework for the North Circular area to guide future investment, development and facilitate regeneration.

The area is finally starting to see some real momentum for change, both on the ground and in planning proposals for the future. Bringing forward the North Circular Area Action Plan (NCAAP) is now, more than ever, a priority. However, delivering on the Council's commitment for fairness for all, growth and sustainability and strong communities by providing for new homes, community and employment opportunities will not come without finding a balance to the difficult issues facing the local area.

This document draws out those complex issues. The central issue is the need for housing in the Borough. The way this can be achieved raises issues of density and building height as well as infrastructure. This is an issue that can be solved with local communities understanding the choices. The development of neighbourhoods flows from this, as does the need to ensure that there is financial viability in the schemes otherwise development cannot be funded. It is about finding creative solutions and defining what the right balance of development is that can ensure we meet our regeneration, growth and sustainability objectives.

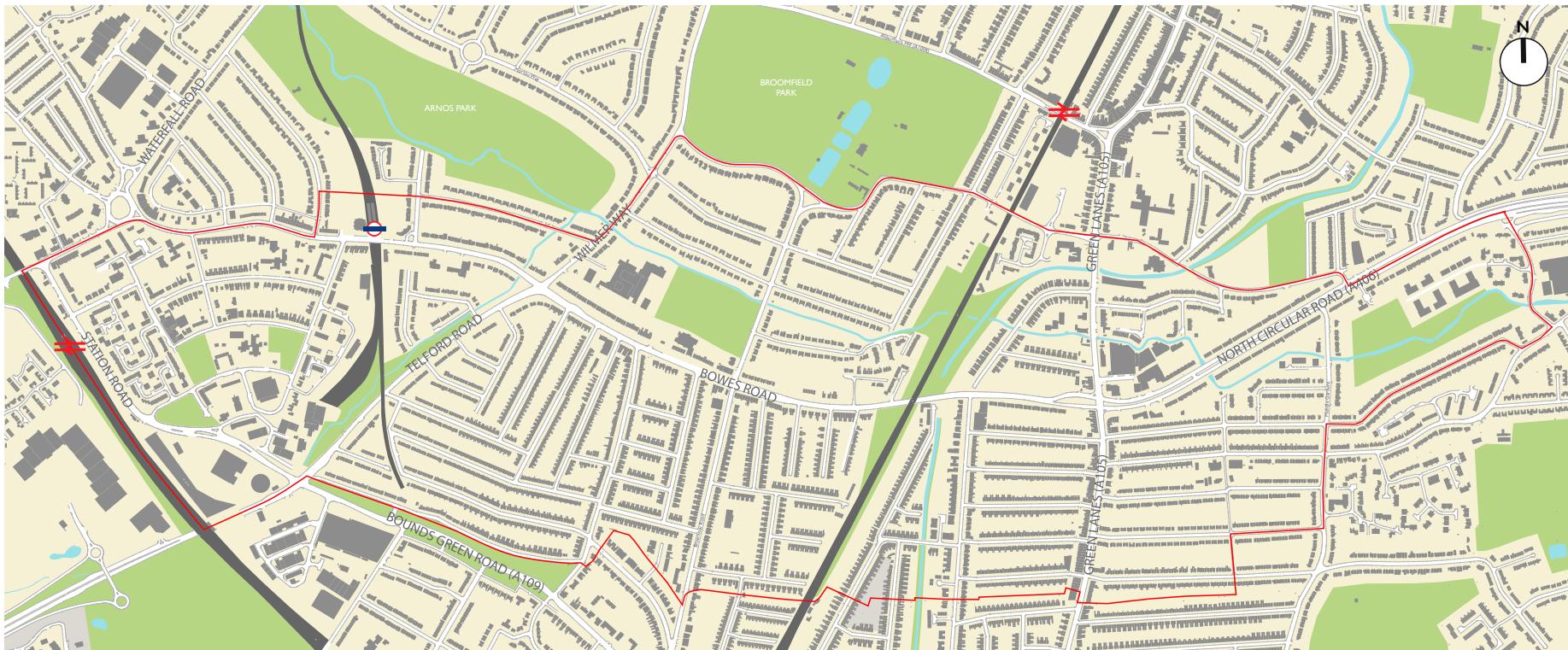
The issues raised throughout this document seek to deliver change in the area holistically. We have had a two year gap since we last consulted the community on the NCAAP, and it is now time to work towards a formal framework that we can sign up to and deliver. To establish a planning framework for the area that develops in ways to meet needs and aspirations. We want the North Circular area to be somewhere people and business want to locate.

This 'Towards Pre-submission' stage document is not the Area Action Plan, but should be viewed as a 'position statement' with the intention to re-engage the community and stakeholders and update on the significant progress being made within the North Circular area since the NCAAP went on hold. It also provides an outline of the emerging NCAAP content and its wider framework introducing three 'Neighbourhood Places', supported by the current position on community infrastructure and housing growth.

We are making this document available for 12 weeks of public consultation period which reflects our commitment to encourage active citizenship.

A handwritten signature in black ink, appearing to read "Del Goddard".

Del Goddard
Cabinet Member for Business and Regeneration



Above: North Circular Road Area Action plan boundary

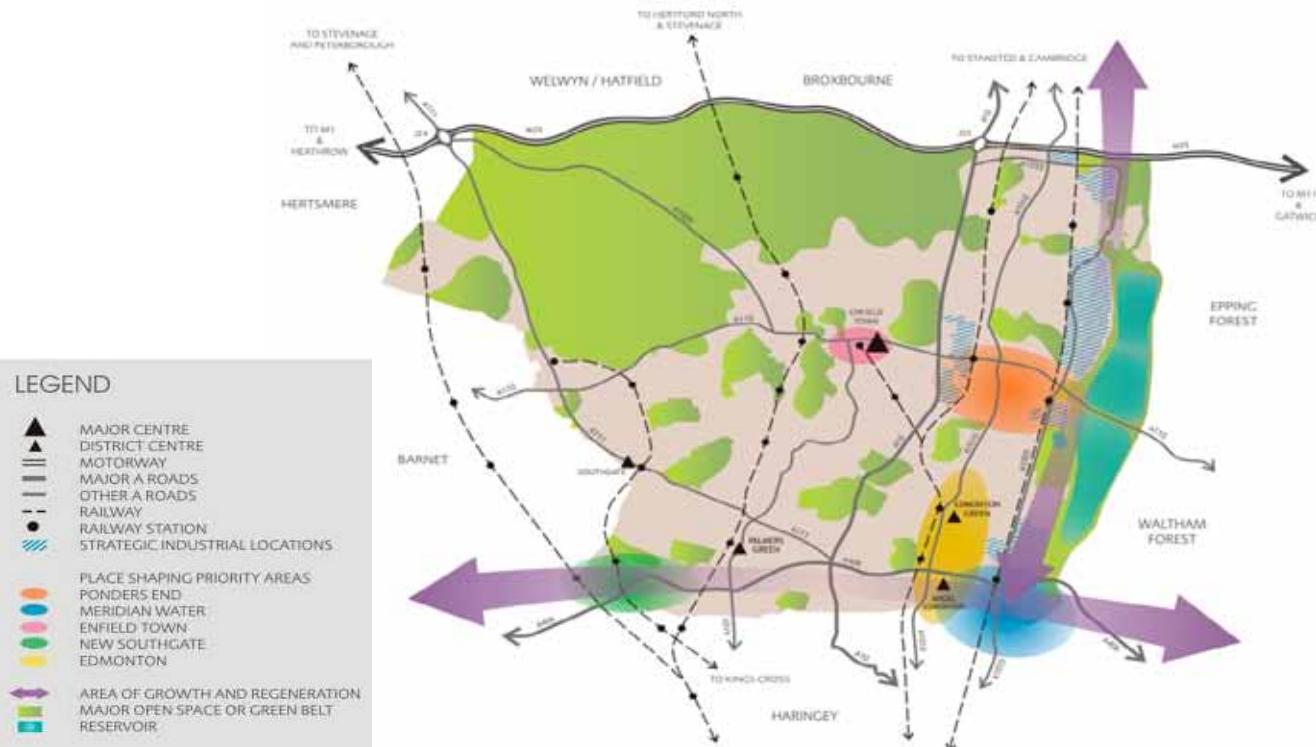
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1 INTRODUCTION

1.1 OVERVIEW

The regeneration and improvement of the area around the North Circular Road including New Southgate, and covering the wards of Bowes, Palmers Green and Southgate Green is a priority for the Council. The area is identified as one of the Borough's strategic growth areas and is one of the Council's "place shaping priority areas". While the area has been in need of regeneration and investment for many years, it is only very recently that significant progress has been made in clearing the path towards the delivery of major improvements.

The Council is preparing an Area Action Plan which will provide a comprehensive planning policy framework for the North Circular area. The North Circular Area Action Plan (NCAAP) will establish a vision for the area and outline a range of policies which, taken together, will help deliver the wider regeneration objectives for the local communities. The NCAAP will include policies and proposals which highlight the key investment and improvement opportunities across the area. These policies will provide guidance against which new development proposals will be assessed and will provide guidance on the relevant design, access and environmental management issues.



Above: Core Strategy Key Diagram showing the North Circular Road AAP area in the south west of the Borough

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This document is for local residents, businesses or people who simply use or pass through the area. The NCAAP is in the process of production and this document's main purpose is to highlight and raise debate on a number of important issues relevant to the area. Importantly, however, it also provides you with the opportunity to get involved at this early stage in the planning of this important area.

The North Circular area in Bounds Green is a diverse and varied location. Like the rest of London, it is composed of a number of centres that have, over time, merged. However, the integrity and character of the centres, (or places), is important for the success of the area and the neighbourhoods and communities that live in the North Circular area.

We have looked closely at this and consider there to be three predominant neighbourhood places across the NCAAP area. The first (moving west to east) is the Arnos Grove and the New Southgate area comprising the small local centres of Arnos Grove and New Southgate, followed by the area around Bowes Road large local centre and thirdly the area around Green Lanes large local centre, which runs perpendicular to the A406. We are proposing to use these centres and places to help provide an appropriate, easy to understand structure for the NCAAP.

This approach has also been informed by the guidance contained in the Enfield Borough Characterisation Study (February 2011). This study, while recognising the strategic importance of the North Circular Road as one of London's key roads, also recognised the opportunity, in managing and controlling new development along the corridor, to respond positively to this route. The importance of creating 'places' and sustainable communities, along this route, act as a central spine drawing communities together rather than forming a barrier, is emphasised in the study and this has informed the identification of the three neighbourhood places in the AAP.

1.2 WHAT IS THIS DOCUMENT FOR?

This document raises a number of important issues and as you read it, you will be prompted by some critical questions we are seeking your views on. We may have missed some issues too, so if we have, let us know.

We originally commenced work on the preparation of the AAP for this area in late 2006 and significant progress was made. However, a view was taken that priority should be given to progressing other more strategic planning documents and work on the NCAAP was paused.

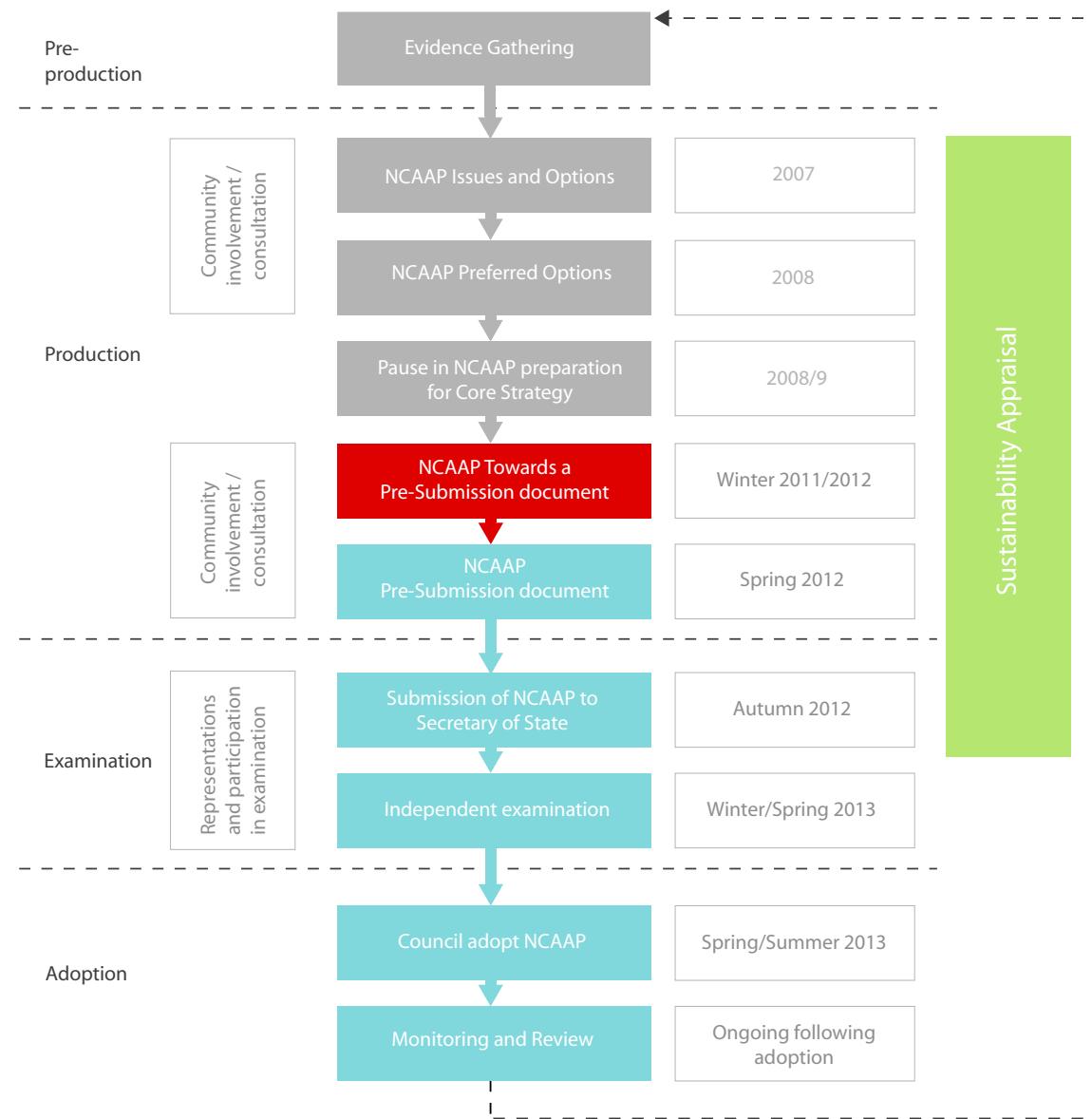
The Council's Core Strategy, which sits above the NCAAP, is now in place and progress on a number of significant initiatives has been made. The time is therefore right to recommence work on the NCAAP and re-engage the local community to ensure the right strategy and policy framework for the area is put in place and new investment in the area responds accordingly.

This document is called 'Towards the Pre-submission stage', as it is intended to bridge the gap between where we left the NCAAP back in 2008/9 and all the changes we are now seeing on the ground, as well as those planned for the future. The emerging content of the NCAAP is likely to be significantly different to the previous stages of the document.

This document seeks to do the following:

- Provide an overview of the new context of the NCAAP – and most particularly the significant progress recently made in terms of securing new housing investment by resolving the future regeneration of the Ladderswood Estate, infrastructure investment by TfL and housing investment by Notting Hill Housing Trust;
 - Provide a view on how the Council resolves the need to deliver strategic housing growth on land historically set aside for road widening with the longstanding aspiration to reduce traffic congestion on the A406;
 - Identify a number of 'neighbourhood places' and the required community infrastructure issues associated with housing growth;
 - Provide concept ideas for each neighbourhood place – which introduces a number of planning, design and development principles for each; and
- **However, the most important thing this document does is provide you with the opportunity to get involved in planning for the future of the area - we welcome your thoughts and views on the content of this document and on what you like and dislike about the area and how you would like to see things change for the better - a series of key questions in blue boxes are asked throughout the document to help you provide your thoughts and comments.**

THE PRODUCTION PROCESS OF THE NORTH CIRCULAR AREA ACTION PLAN (NCAAP)



Above: The production process of the North Circular Area Action Plan (NCAAP)

1.3 IMAGE

The image of the area is a key issue for a number of interrelated reasons; for residents the poor image only serves to sever community pride, for local business it creates an environment which does not relay an 'open for business' message and for visitors passing through it lacks identity.

The journey along this part of the North Circular Road acts for many visitors as a gateway to the Borough of Enfield and therefore is central in forming important first impressions. The importance of this issue has been compounded by the lack of investment in the immediate corridor either side of the North Circular Road and the transient population living alongside the road due to short-term lets. This lack of investment has led to concentrations of antisocial behaviour which has further eroded the faith held by local people in delivering improvements in this important part of the Borough.

The degree to which an area is perceived to be cared for and valued by those responsible for its upkeep has a major bearing on the pride local people have for an area. This reciprocal relationship is really important as, while the Council has many responsibilities in this regard, it is at the same time dependent on local residents and businesses to make their contribution to ensuring the area is perceived as an attractive, welcoming and friendly place to live and do business.



01. What is your image of the area?

1.4 UNCERTAINTY AND LACK OF INVESTMENT

The Council has been arguing the case for investment in the Bounds Green area for many years. However, it is only until recently that this has been rewarded with commitments, firstly from TfL to deliver significant environmental improvements to the road corridor, and secondly by Government to support and enable the transfer of blighted land and property to unlock much needed investment.

It is the blight associated with an uncertain future for the area that has resulted in a chronic lack of investment. Plans for a number of different road improvement schemes have been, over a period of many years, promoted but none have prevailed – principally through the failure to secure the necessary and very considerable resources to deliver such improvements.

Inherited by Transport for London (TfL), the land and property required for such schemes has effectively been left dormant and decay and dereliction have resulted. This has had a longstanding negative impact on the established communities who live in the area and local businesses.

The NCAAP presents a major new opportunity to help reverse this situation. Guided by strong community and stakeholder input, it will set out the a vision and strategy for the future of the area. Much of the uncertainty that has blighted the area is lifting. The future is bright for this important part of Enfield and the AAP will oversee an exciting period of rapid transformation and investment.



1.5 TRANSPORT FOR LONDON A406 ROAD IMPROVEMENTS

TfL are in the process of delivering a comprehensive programme of improvements to the North Circular Road and its immediate environs in the Bounds Green area. These improvements, whilst significant in their scope, are modest in nature when compared with the road schemes, many involving flyovers at key junctions, which have been tabled in the past. Whilst the improvements currently being implemented are not targeted at increasing road and traffic capacity and thereby reducing congestion, they will improve the safety for all road users, improve the environment for local people and give greater priority for more sustainable modes of travel.

This will help in the ongoing push to encourage people to shift from relying on the use of their private car to other more sustainable modes of transport. Where such opportunities exist, efforts will be made to encourage this shift.

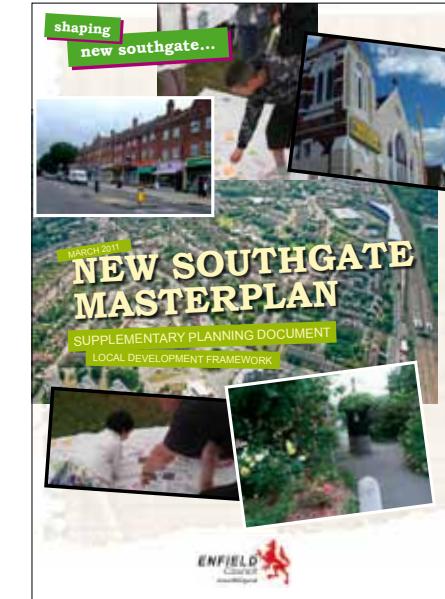
There will, of course, still be a need to keep things under review following completion of the current road improvement scheme. We are aware of local issues that remain problematic such as the turning of articulated lorries at the Wilmer Road/Bowes Road junction. It may be that minor adjustments to the area's key road junctions are still needed in the future. The Council continues to work with TfL, local residents and businesses to ensure the planned improvements are delivering the quality of improvements to both safety and the environment.

1.6 NEW INVESTMENT

The Council has already established it's commitment to deliver new housing in the area Housing that matches the local need, and which is only delivered in parallel with the right balance of community facilities and infrastructure that supports the population growth new homes will bring.

In 2010, the Government awarded £54 million to be allocated towards upgrading and refurbishing the land and property that TfL had inherited which had originally been set aside for a major road widening scheme. This major grant award has enabled the land and property to be transferred to Notting Hill Housing Trust (a registered social landlord and housing provider), who will deliver improvements to existing stock and deliver new housing to meet local need.

In addition, Notting Hill Housing Trust will themselves contribute a further £35 million to the overall scheme which will enable existing dwellings which remain in a reasonable state of repair to be brought back into housing use and the phased redevelopment of the remaining land and property. Furthermore, Notting Hill Housing Trust will also provide some of the community infrastructure requirements required for the area. The NCAAP will provide the policy framework and context within which these new development proposals come forward.



Above: New Southgate illustrative Masterplan

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1.7 THE FUTURE OF LADDERSWOOD

The NCAAP will cover a wider area than the North Circular Road corridor alone. However, given the scale of investment now secured for this area and the phased approach being developed, the NCAAP has a key role to play in steering this investment, guided and informed by the widest possible stakeholder and community input.

In parallel with the progress made by the Council, TfL and Notting Hill Housing Trust, in 2009 the Council agreed that the Ladderswood Estate would undergo comprehensive regeneration. This will consist of part demolition and part retention, with homes brought up to decent homes standards. The Council has worked closely with the resident community of the estates during the preparation of the New Southgate Masterplan, which was adopted as a Supplementary Planning Document in March 2011.

In May 2011, the Council selected Mulalley and One Housing Group as their development partners to undertake the regeneration of the Estate. A planning application is expected early 2012 with housing delivered in 2014. The NCAAP, alongside the New Southgate Masterplan, will provide the policy framework and context within which these new development proposals come forward.



2 POLICY CONTEXT

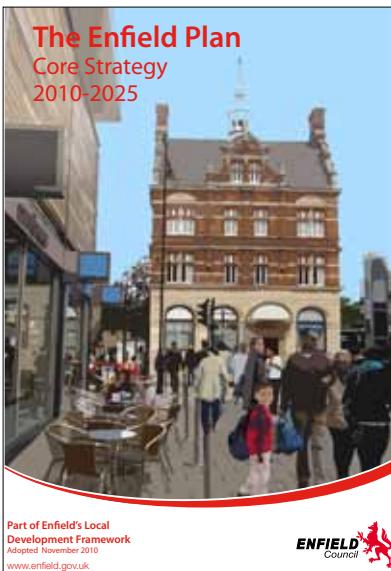
2.1 ENFIELD CORE STRATEGY (2010)

The preparation of the NCAAP paused in 2009 as the Council made a conscious decision to progress and establish strategic policy context in the The Enfield Plan - Core Strategy.

The Core Strategy was adopted in November 2010. It is a strategic document providing the broad strategy for the scale and distribution of development and the provision of supporting infrastructure, ensuring that investment decisions are not made in isolation but are properly coordinated to ensure sustainable development.

Housing

The Core Strategy envisages that approximately 1,500 new dwellings will be delivered across the NCAAP area by 2025 (450 homes by 2014/15, 550 homes by 2019/20 and 500 homes by 2024/5), with up to 500 more homes by 2029/30 (Core Policy 2). This equates to a population growth of around 3,700 and a total population of 35,547 in the area by 2026, including child growth of 1,576 (aged 0-15). However, the housing figures will be reviewed as the AAP progresses and will need to be coordinated alongside the delivery of the necessary community infrastructure and jobs to cater for the expected level of growth.



Above: The Enfield Plan - Core Strategy

Community infrastructure

The Core Strategy outlines a position on the provision of community infrastructure and particularly health and education provision under Core Strategy Policy 7 and 8 respectively. A commitment is made for a new walk-in health facility in the Arnos Grove/New Southgate area in the period up to 2015.

Schools

In addition, there is an aspiration to provide a new all age school on the site of Broomfield Secondary School, while there is likely to be a need to find the capacity for an additional 2 primary school forms of entry within the AAP area between 2015 and 2020.

Cultural facilities

The need to cater for leisure/recreation and cultural facilities associated with population growth in the area is also highlighted in the Core Strategy. Bowes Ward is identified as being deficient in open space provision which is an issue of particular relevance to the NCAAP (See section 3.4 for further information).

2.2 THE MAYOR'S TRANSPORT STRATEGY, MAY 2010

The Mayor's Transport Strategy is relevant to the NCAAP, particularly given the strategic road network issues of direct relevance to the area.

The Strategy confirms that the Mayor's broad approach to managing road congestion is the "smoothing of traffic flow". The Strategy makes no commitment to major investment in the A406 in this Bounds Green area with the objective of increasing road capacity to help reduce traffic congestion. However, commitment is given to funding the safety and environment scheme at Bounds Green which is currently being implemented and due for completion in 2012.

2.3 THE COUNCIL'S POSITION ON FUTURE A406 IMPROVEMENTS TO REDUCE CONGESTION

A key issue to be considered and resolved during the preparation of the NCAAP is the position to be taken on the support to be given to significantly increasing the road capacity of this part of the A406. The longstanding uncertainty over the delivery of a major road scheme for this part of the A406 has been the root cause of many of the area's environmental problems.

The area is poised to benefit from very significant levels of much needed and long overdue investment. The Council has already evidenced through the Core Strategy that investment in improvements to the A406 beyond those currently being delivered by TfL are not essential to deliver the planned strategic housing growth. i.e. the current capacity of the A406 alongside a shift towards more sustainable travel patterns can support the new population growth.

The Core Strategy is also clear that the strategic priority for this area and the Borough as a whole is the delivery of strategic regeneration. Whilst the Council would welcome further improvements at key junctions in the area where congestion continues to be a major issue, no commitment is given to such improvements in the Mayor's Transport Plan. The A406 is part of the Transport for London Road Network and is therefore under direct TfL control.

2.4 KEY ISSUES

The Core Strategy is therefore clear that the Council's principal priority for this area is the delivery of strategic growth as outlined in Core Strategy Policy 1. This should, therefore, be the primary consideration in determining planning applications in the area, subject to accordance with other policies in the Local Development Framework.

This growth, however, will need to be matched by investment in transport and other community infrastructure. Local traffic congestion remains a cause for much local concern and the Council will continue to pursue measures which will help local people move freely and efficiently through their local area. Improved pedestrian and cycle facilities as part of the environmental improvements currently being delivered by TfL should help shift towards more sustainable travel patterns, particularly for shorter, local journeys.



Understanding an area - how it works now, how it came to be that way, and how this can shape its future - is crucial to developing effective planning policies and guidance for an area and help deliver real change on the ground. The following key issues have been identified for the area which the NCAAP will respond to in order help deliver continued investment and regeneration in the area:

- Improving the image of the area for local residents, businesses and visitors;
- Creating sustainable and enduring communities with improved access to open spaces and green routes;
- Establishing the integrity and character of local centres as specific, distinct and attractive places;
- Delivering improvements and opportunities for local people in work, education, health and housing;
- Improving the harsh environment and managing the livability quality along the A406 corridor; and
- Securing and directing the balance of investment needed to support growth in the right places, in accordance with the Core Strategy.

3 VISION AND OBJECTIVES

3.1 DRAFT VISION

The area will be transformed from one disconnected by an unforgiving road corridor and dominated by derelict housing to three distinct sustainable neighbourhood places, with high quality housing, attractive spaces, and vibrant retail and community clusters at New Southgate/ Arnos Grove, Bowes Road and Green Lanes.

New and improved pedestrian and cycle routes that are safe and attractive will provide important links to these clusters and create an accessible network of green spaces. These spaces will help unite communities currently divided by the North Circular Road.

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

These neighbourhoods will be desirable places to live and provide existing and new communities with high quality new and improved housing, supported by local services and jobs, improved transport and access to enhanced green space and leisure facilities'

A significant amount of work has already been done during the earlier stages of AAP preparation. Broadly speaking, the focus has remained the same throughout – to improve the quality of life for existing residents, create opportunities for new residents to integrate with these communities and to tackle directly the blight and the challenges of living in such an environment. The North Circular Road can, therefore, act as a central spine, drawing communities together rather than separating and dividing the area.

The draft vision for the NCAAP is shown to the left.



3.2 OBJECTIVES

The following objectives outline what will need to be achieved to deliver the vision and address the key issues that have been identified for the area:

Neighbourhoods

1. Provide a spatial planning document which focuses on the area's three neighbourhood places - Arnos Grove/New Southgate, Bowes Road and Green Lanes. The document will help guide and deliver future growth and prosperous healthy communities.

Housing and jobs

2. Promote social inclusion, tackle deprivation and provide new employment opportunities.
3. Optimise the provision of decent homes for sale or rent at a price local people can afford and meets local need.
4. Identify and promote specific opportunities for new development that will contribute significantly to the strategic housing targets outlined in the Council's Core Strategy.

Movement

5. Improve the quality and attractiveness of the movement network / infrastructure and encourage the use of sustainable modes of transport, particularly walking and cycling by improving local routes and connections.

Environment

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

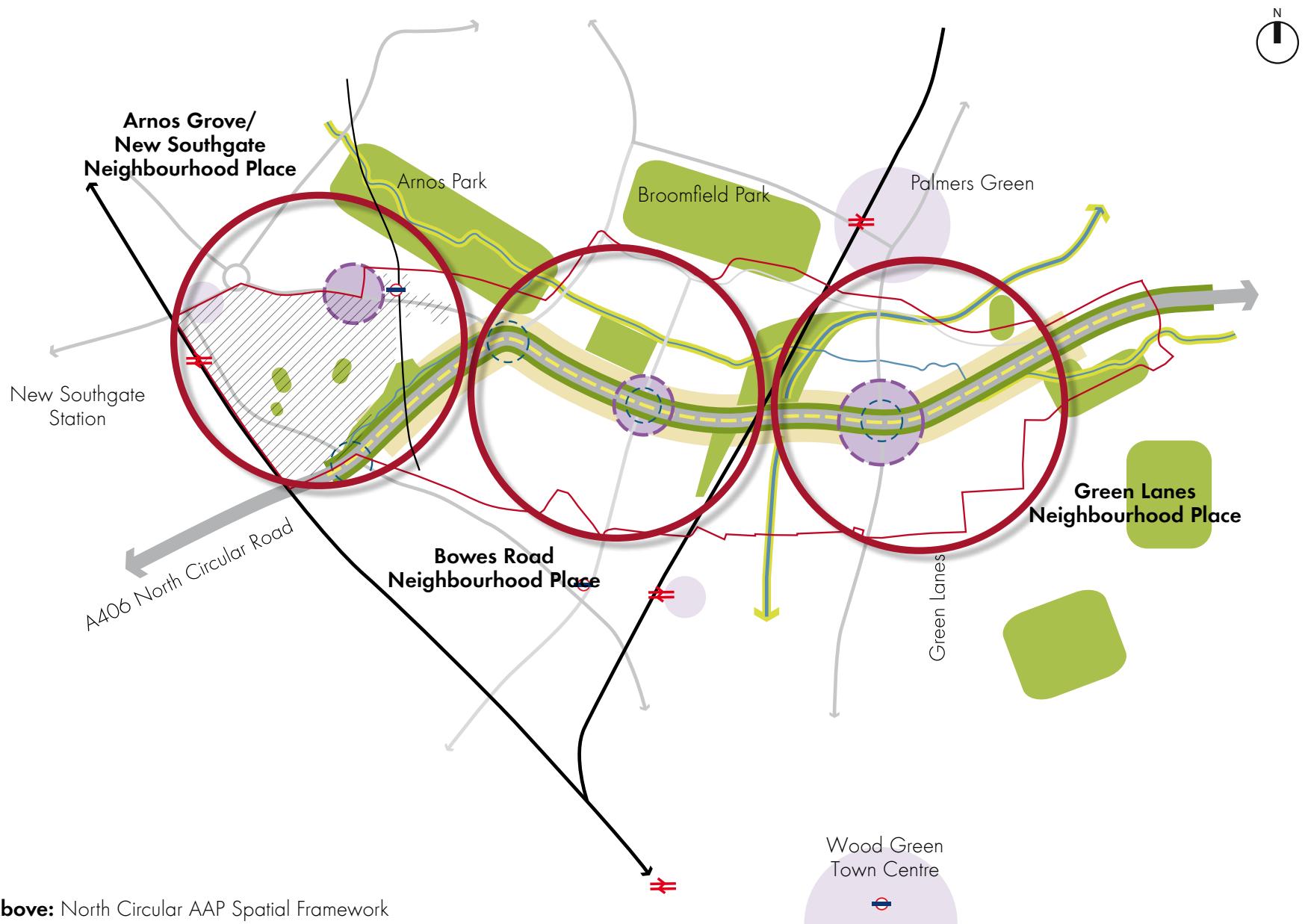
Infrastructure

7. Ensure the coordination of other infrastructure requirements: social, economic, educational, physical and environmental.

Phasing and delivery

8. Provide a strategic phasing programme for delivery of the key development sites and supporting infrastructure.
9. Provide a clear and robust framework in which the Council, as local planning authority, and the Mayor of London and GLA, as the strategic planning authority, can make decisions on related planning applications.





Above: North Circular AAP Spatial Framework

3.3 THE SPATIAL FRAMEWORK

	AAP boundary
	3 Neighbourhood Places (red circles)
	Local centres in neighbourhood places
	North Circular Road frontage sites - refurbishment/redevelopment
	New Southgate Masterplan area
	TfL improvement scheme - yellow dashed lines (road improvements) and blue circles (junction improvements)
	Open space
	Green and blue links
	Other local/town centres

The growth planned is set within the context of an over-arching spatial framework for the NCAAP area. Key elements and features of the spatial framework include:

- Three 'Neighbourhood Places' at Arnos Grove/New Southgate, around Bowes Road local centre and around Green Lanes have been identified as these could provide the focal points for the planned growth. These centres will play an important role in meeting the day to day shopping and community needs for the existing and new residents. It is important that the delivery of housing growth is matched by improvements to, and investments in, these centres so their role is strengthened to become community hubs of activity. This is a key component in the delivery of a sustainable planning strategy for the North Circular area.
- The three Neighbourhood Places are linked by the North Circular Road corridor, along which investment is planned. Where possible, existing dwellings will be brought back in to housing use and where this is not viable new high quality developments, designed specifically to respond positively to the local environmental conditions, will be delivered. Some of these longer term redevelopment opportunities may be better progressed in conjunction with additional private land owners.

- In the context of a growing local population, existing green infrastructure will play a very important role in the delivery of sustainable neighbourhoods. Parts of Bowes Ward south of the A406 are deficient in the provision of open space which will be an issue that new residential development will need to address.
- An attractive, connected network of pedestrian and cycle routes will be facilitated by the safety and environmental improvements currently being delivered along the length of the A406 in this area. Ensuring good quality links are provided to key local centres, facilities, services and infrastructure is important.
- The New Southgate area is one of the Council's Place Shaping Priority Areas. Very significant progress has been made in resolving the future of the area since the decision was made by local residents to redevelop part of the area and provide a significant number of new dwellings. The Council has recently adopted the New Southgate Masterplan as a supplementary planning document which was prepared with the benefit of extensive community consultation. The Masterplan provides a detailed framework for change in this major priority area.

3.4 COMMUNITY INFRASTRUCTURE

While the Core Strategy envisages that around 1,500 new dwellings will be delivered across the NCAAP area by 2025 (with up to 500 more by 2029/30), these figures will be reviewed as the NCAAP progresses. This review will be important as the total number of new dwellings planned for in the NCAAP impacts directly on community infrastructure required for the area. Notwithstanding this, there are a number of essential elements of community infrastructure that will be required as a direct result of major sites coming forward.

The North Circular Road currently has a significant impact on community infrastructure and how it is used. It can make facilities that are close by feel distant and separate when the road needs to be crossed. The walk to a formal crossing point can add significantly to the journey in terms of both time and distance, but also anxiety. For elderly people, parents with young children and the more vulnerable in society, this is a particularly important issue.

However, the environmental improvements currently being implemented provide wider pavements, a more attractive environment and more at-grade road crossings to help create a more attractive and safer environment for pedestrians. This can help knit together communities and reduce the impact of community infrastructure being located on the other side of the road. The community infrastructure issues in the NCAAP area are as follows:

a) Education

The position on education provision remains under review and will be clarified through the NCAAP process – the current commitment allows for the possible provision of one additional form of entry at Garfield Primary School. No additional capacity is envisaged in the creation of a new all-age school on the site of the existing Broomfield Secondary School. The Core Strategy identifies that one further primary form of entry may be required over the plan period within the NCAAP area. At this time, it was envisaged that no additional land was required for the provision of new secondary school places within the NCAAP area.

Ensuring that nearby schools provide local families with the school places they need is a key issue for the Council and the NCAAP. Schools in neighbouring boroughs will have an important role to play in this regard. The Council is keeping this position under review and will continue to work closely with education stakeholders in the Borough and neighbouring authorities to ensure the necessary school places needed to serve a rising population are provided for.



Q 06. Do you think more school places are required?

Q 07. If so, where is the best place to increase provision?



Above: Arnos Park



Above: Broomfield Park

b) Health care provision

The Core Strategy identifies the potential need for a new walk in health centre in the Arnos Grove/New Southgate area. The Coppicewood Lodge site has been identified in the New Southgate Masterplan as one potentially appropriate location for this facility. In addition, the Southgate Town Hall / Palmers Green Development Brief has recently been adopted, which includes the retention of the library and the provision of new community/leisure uses, alongside new residential development.

- Q 08. Are there any other locations that would be suitable for new or improved health facilities?**
- Q 09. What kind of health facilities are needed?**

c) Other community uses and facilities

There is a range of existing community uses and facilities across the NCAAP area, including the Arnos Grove swimming pool, the Palmers Green Library and the North London Assembly Hall incorporated within the Ritz Parade on Bowes Road. New development will increase the pressure on these facilities and should therefore

provide contributions to ensure these important community services can meet increased demand.

New community facilities will be delivered as part of the regeneration of the Ladderswood Estate. It is important that new community facilities should be accessible to local residents, which generally means they are located in local, district or town centres. The role of the NCAAP is to outline where the most appropriate locations are for such facilities, based around the existing local centres within the area.

- Q 10. Do you think existing local centres are the best and most appropriate locations for new community facilities?**

d) Open spaces and public realm

Emerging evidence suggest that the NCAAP area may be deficient in open space provision given its significant population. However, it is acknowledged that it would be difficult to meet this deficiency through new provision given the area's built up nature. Whilst the opportunities for new provision is limited, the NCAAP will explore how to improve and make the most of existing assets and the existing network of important open spaces.

The TfL A406 environmental improvement scheme is already helping by providing greater crossing facilities for pedestrians and cyclists and thereby improving access to existing open spaces and green routes.

To help mitigate against the open space deficiencies in the area, new development should continue to deliver improvements in the access to and quality of existing open spaces that serve local people – not all of which will be within Enfield borders and will therefore require partnership working with adjoining boroughs to provide comprehensive provision of open space in the area.

Important open spaces in and around the NCAAP area include:

- Arnos Park;
- Broomfield Park;
- Boundary Playing Fields;
- Millennium Green, New Southgate;
- The open space along Tewkesbury Terrace adjoining the AAP area to the south within Haringey;
- The open space adjacent to Cherry Blossom Close which may provide an opportunity to provide a new public open space; and
- The network of waterways and walking routes that traverse the area, including the New River Path and Pymmes Brook Trail.



Q 11. Are these the right spaces to improve if the opportunity arises?

Q 12. Are there other spaces we should be looking to improve or provide access to?

Q 13. Do the local rivers and water courses present opportunities?

Q 14. What sort of improvement would you like to see?

Q 15. Are there enough play areas for children or playing fields in the area?



Above: Pymmes Brook Trail



Above: The New River Path

3.5 ENVIRONMENTAL ISSUES

a) Backland development

In suburban residential areas such as this, the development of back gardens for new residential dwellings can have a significantly detrimental impact on existing residential amenity.

The redevelopment opportunities that will be identified in the AAP area will seek to protect existing residential amenity and, generally, should not involve the use of existing back garden land for new residential development where this will harm the amenity of existing residents. The land between the existing houses on the north side of Bowes Road and the southern edge of Broomfield Secondary School does, however, presents an opportunity to introduce a news mews style street behind the existing dwellings along Bowes Road.

These houses are currently being refurbished and will be occupied by new residents, while the land backs on to the blank side of the secondary school. A rear service alley already exists although this area suffers from fly tipping and anti-social behaviour.

The residential amenity issues can therefore be addressed through careful design and the delivery of a significant number of new homes, secured with improved links to local services.

Beyond this special case, the Council will generally not support backland development because of the harm it can cause to the amenity enjoyed by residents of existing housing stock.

In exceptional circumstances new proposals for backland development will be considered on their individual merits and subject to negotiation.

 Q 16. Do you agree with this approach to backland development?

b) Rear service lanes

The area has for many years suffered from fly tipping and anti-social behaviour, much of which has taken place in the many rear access ways and alleys between the adjacent back gardens of residential properties. Examples of this include the rear alleys behind the properties on the south-west side of Telford Road.

Whilst these sometimes provide valuable parking and secondary access functions for dwellings with access and parking issues, these areas remain vulnerable to abuse and misuse. Improvements in the area have already been made with gates provided to control access across for some of the rear service lanes. This programme of improvements should continue in conjunction with the planned housing refurbishment and redevelopment.

 Q 17. Do you agree that, where possible and practical, rear access yards should be controlled with gated access?

c) Environmental mitigation and air quality

Enfield Borough as a whole has been declared an Air Quality Management Area. The latest data from Enfield's monitoring station along the A406 shows that the area suffers from air quality issues.

The Council has limited control over air quality, although the issue will be an important material consideration in the determination of planning applications. However, the design of new development and their associated landscaping proposals can significantly help in the mitigation of environmental problems such as air and noise pollution.

The AAP will highlight the importance of the design and layout of new development in delivering this mitigation. It is important to ensure the A406 is seen and perceived to be an integral part of the public realm. It should be a route that is used by motorists, cyclist and pedestrians alike. Having new buildings that address the road directly with windows and doors accessed directly from it is therefore important. The internal planning of new development can then help mitigate against air and noise pollution by positioning rooms used for living and sleeping away from the most polluted side of the development.

The approach taken to ventilation is also relevant and it may be possible to draw cleaner air in from the less polluted side of the development. Landscape and biodiversity proposals will also play an important role in the mitigation of pollution.

Q 18. Is air quality an issue for you?

Q 19. Do you agree to this approach to improving air quality in the NCAAP area?

3.6 BUILDING HEIGHTS AND DEVELOPMENT DENSITIES



Above: Taller development at Green Lanes



Above: Two storey suburban housing

Aside from the Ladderswood Estate, building heights in the area are predominantly two storey pitched roof buildings, largely consisting of suburban terrace and semi-detached housing. However, the area also contains some taller buildings which generally front major routes in the area and are located in local or town centres, consisting of a commercial ground floor and housing above. This helps to signify the location of these centres in the local townscape, provide greater definition and enclosure to these routes and help support local services.

The financial viability of new development is an important consideration for the NCAAP in order to continue the recent investment in the area. In addition to being viable, new development within the NCAAP area should also positively respond to the existing context of building heights in the area. This means that taller buildings may be considered more appropriate in more sustainable locations i.e. those that benefit from better public transport accessibility and easy access to a range of shops and services which helps reduce the need to travel.

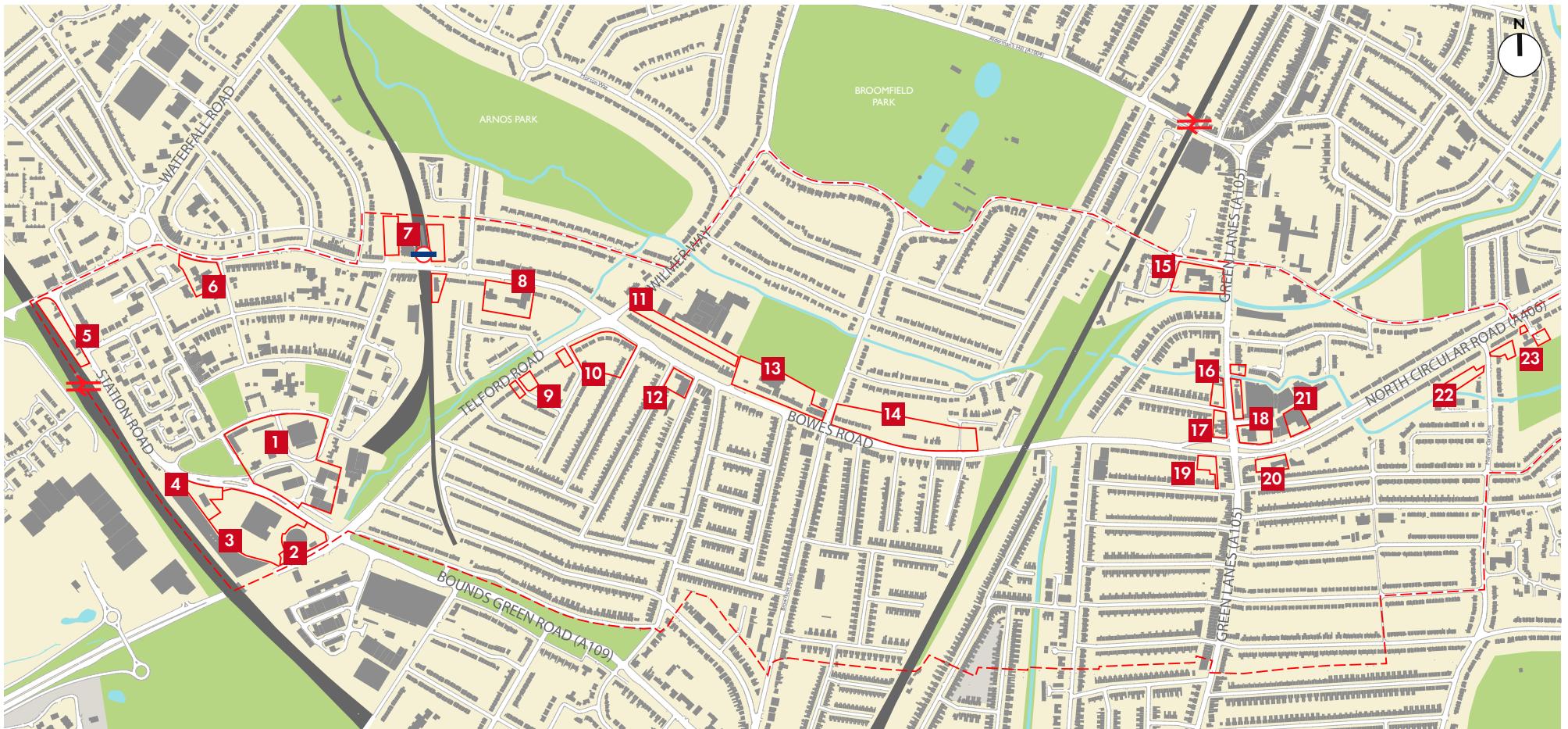
This is in accordance with the Core Strategy, which states that improvements to local centres will include higher density commercial development with residential uses above at the junction of Green Lanes and the North Circular. This will be important to help deliver the housing targets contained within Core Strategy for the NCAAP of around 1,500 new homes by 2025, while also helping to support the delivery of new community infrastructure.

Away from the local centres and major routes through the area, taller buildings are generally not considered to be appropriate to maintain the suburban character of the area.

Q 20. Do you agree with the approach of locating taller buildings in local centres along the North Circular, but not within areas of suburban character?

Q 21. Are there any specific areas you think it would be appropriate for taller buildings?

Q 22. Are there any specific areas you think are not suitable for tall buildings?



Above: North Circular AAP development sites

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Site Number	Site name	Indicative site capacity range for new homes
1	Ladderswood Estate	239*
2	Western Gateway - Gasholder site	112*
3	Western Gateway - Homebase site	203*
4	Western Gateway - Topps Tiles site	49*
5	New Southgate Station and Friern Barnet Road Shops	84*
6	Coppicewood Lodge Care Home site	23*
7	Sites around Arnos Grove station	56*
8	Bowes Road Library and Clinic and Arnos Pool	n/a**
9	Corner sites fronting Telford Road	7-29
10	Wilmer Way Junction site	20-49
11	Bowes Road adjacent school	14-36
12	Bowes Park Primary School site	9-28
13	Ritz Parade and Assembly Hall site	50-92
14	Bowes Road local centre east site	63-125
15	Southgate Town Hall	4-7
16	Sites fronting Green Lane north	9-34
17	Green Lanes junction north-west	7-32
18	Green Lanes junction north-east	12-38
19	Green Lanes south-west site	6-14
20	Labour Exchange and adjacent site	8-33
21	377 North Circular Road	n/a**
22	Site to west of Melville Gardens	2-5
23	Birchwood Court sites	6-16
Indicative total		983-1304

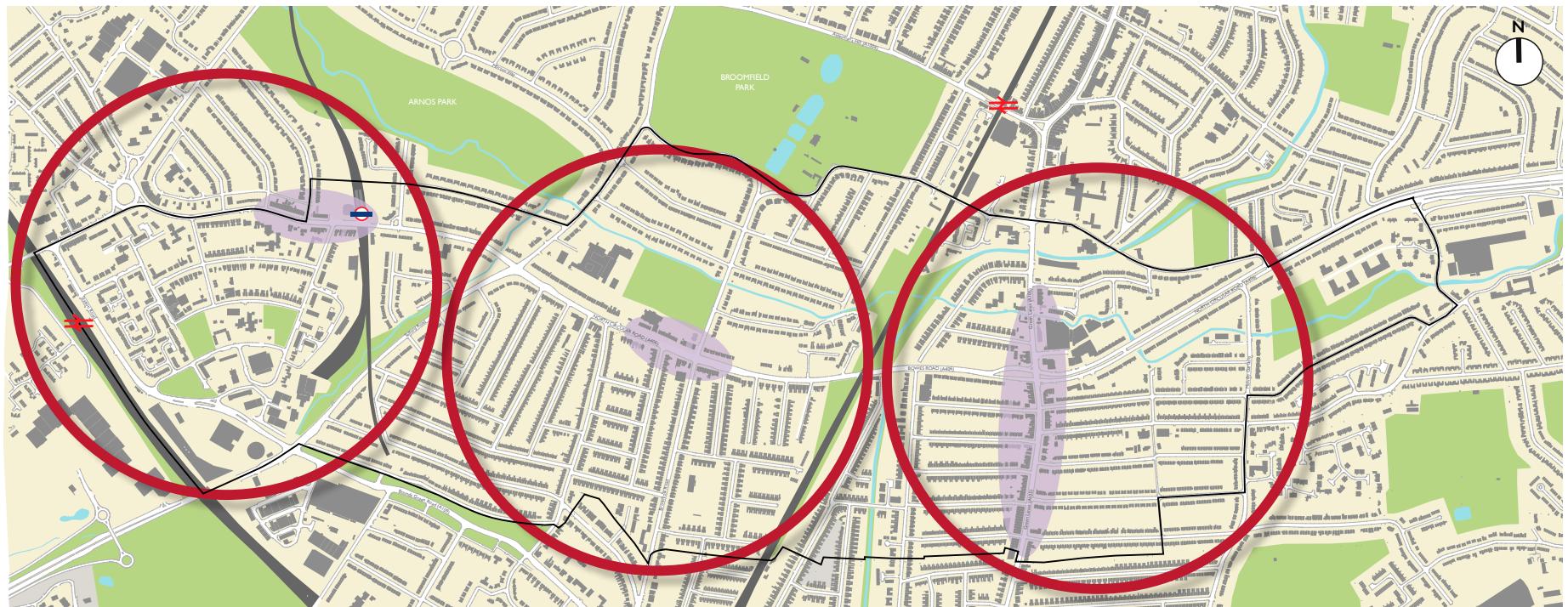
*figures taken from the New Southgate Masterplan (March 2011)

**not considered appropriate for housing

3.7 DEVELOPMENT SITES

There are a number of development sites identified within the NCAAP area. These are shown on the plan and table opposite. The indicative site capacity ranges for new homes have been derived from regard to the London Plan density matrix and an initial urban design analysis of each site. The lower figure in the range responds to the lower range of the applicable density in the London Plan density matrix, whereas the upper figure in the range responds to the site analysis and/or the higher range of the applicable density in density matrix. The figures for sites 1-8 are from the New Southgate Masterplan (March 2011).

All figures are indicative only and are subject to review and change as the NCAAP progresses and as individual planning applications are progressed.



Above: Location of the three Neighbourhood Places based around three local centres

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4 NEIGHBOURHOOD PLACES

4.1 THE THREE NEIGHBOURHOOD PLACES

Three 'Neighbourhood Places' have been identified for the NCAAP – Arnos Grove/New Southgate, Bowes Road and Green Lanes. These three places are located approximately 1km apart and incorporate important local centres. They provide small scale shopping and community and health services, and accommodate small businesses, within walking distance for the vast majority of local residents in the NCAAP area.

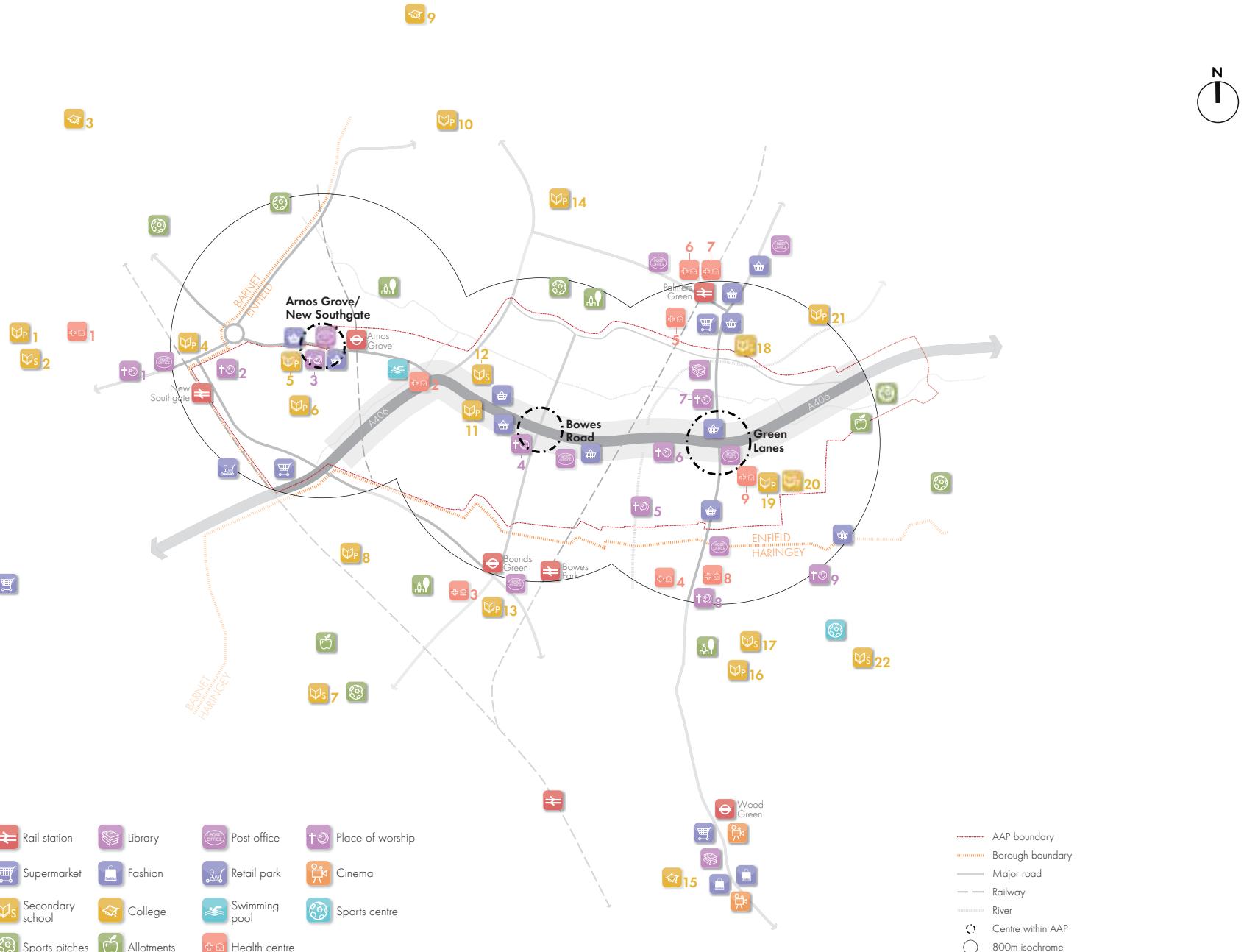
While the AAP area has an east-west focus, based along the North Circular Road, these neighbourhood places also operate and serve communities to the north and south of the local centres. Infrastructure and environmental improvements proposed as part of the AAP, alongside the current environmental improvements by TfL, will offer greater north-south connections in these places and help draw the communities together, focussed around the central spine of the North Circular.

Arnos Grove/New Southgate

This Neighbourhood Place is covered broadly by the New Southgate Masterplan. The regeneration of this area is the principal priority within the NCAAP. The Council has been working closely with local people for a number of years to help resolve the future of the dilapidated housing estates which characterise the area. Privately owned sites adjacent to the railway also provide major regeneration opportunities. The adopted Masterplan provides a clear and detailed framework for the regeneration of the area which will be delivered in partnership with the Council's developer partner, bringing new employment, housing and community opportunities.

Bowes Road

This Neighbourhood Place straddles the A406 and is centred on existing commercial parades of shops along Bowes Road. TfL's current road scheme has resulted in some of the commercial property on the northern side of Bowes Road being demolished. In addition, some of the public parking spaces serving the commercial units will be lost. This parade, known as Ritz Parade, currently houses the North London Assembly Hall of the Jehovah's Witnesses. The future opportunities of Ritz Parade will be explored, as it has the potential to act as a community hub supported by local commercial enterprise.



Above: Community life plan, showing local facilities in the area

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Education

1. St Johns C of E Primary School
2. Friern Barnet Secondary School
3. Barnet College/Middlesex University
4. St Pauls C of E Primary School
5. Our Lady of Lourdes Catholic Primary School
6. Garfield Primary School
7. Alexandra Park School
8. St Martin of Porres Primary School
9. Southgate College
10. Walker Primary School
11. Bowes Primary School
12. Broomfield School
13. Bounds Green Junior School
14. St Monica's RC Primary School
15. Mountview Academy of Theatre Arts
16. Earlham Infant & Jr School
17. St Thomas More RC School
18. St Anne's Catholic High School for Girls
19. Tottenham Infant School & Children's Centre
20. St Michael-at-Bowes C of E Junior School
21. Hazelwood Infant and Junior Schools
22. Woodside High School



Health centres

1. Holly Park Clinic
2. Arnos Grove Medical Centre
3. Bounds Green Health Centre
4. Evergreen House Surgery
5. The North London Health Centre
6. Grovelands Medical Centre
7. Park Lodge Medical Centre
8. The Surgery Arcadian Gardens
9. Grenoble Gardens Surgery



Places of Worship

1. New Southgate & Friern Barnet Christ Church
2. St Pauls C of E Church
3. Our Lady of Lourdes RC Church
4. Palmers Green & Southgate Synagogue
5. Christ Church of St Michael-at-Bowes
6. Trinity-Bowes Methodist Church
7. Palmers Green Baptist Church
8. New Testament Church of God
9. Parish Church of St Cuthbert

The area also benefits from the local Bowes Primary School which occupies an attractive and listed old school building on the south side of the A406 between Stanley Road and Highworth Road. Broomfield Secondary School occupies a large site, accessed off Wilmer Way, which extends all the way to Powys Lane running behind the Bowes Road parade.

The housing in the area is typically turn of the century and early 20th century terraced housing on the south side of the A406 with slightly later and more specious Edwardian semis on the north side.

Green Lanes

This area, at the eastern end of the AAP area, is centred along one of London's key radial streets - Green Lanes - which runs north-south between Winchmore Hill and Palmers Green in the north and Wood Green and Haringey to the south. The junction with the North Circular Road marks a significant location along the road and, due to the potential development sites, is likely to be a major focus of change in the AAP area.

A series of established residential streets perpendicularly join Green Lanes along its length, particularly south of the A406 where the block pattern has not been affected by the route of New River. These compact, high density residential streets play a very important role in supporting the hundreds of local businesses along this historic north-south commercial spine.



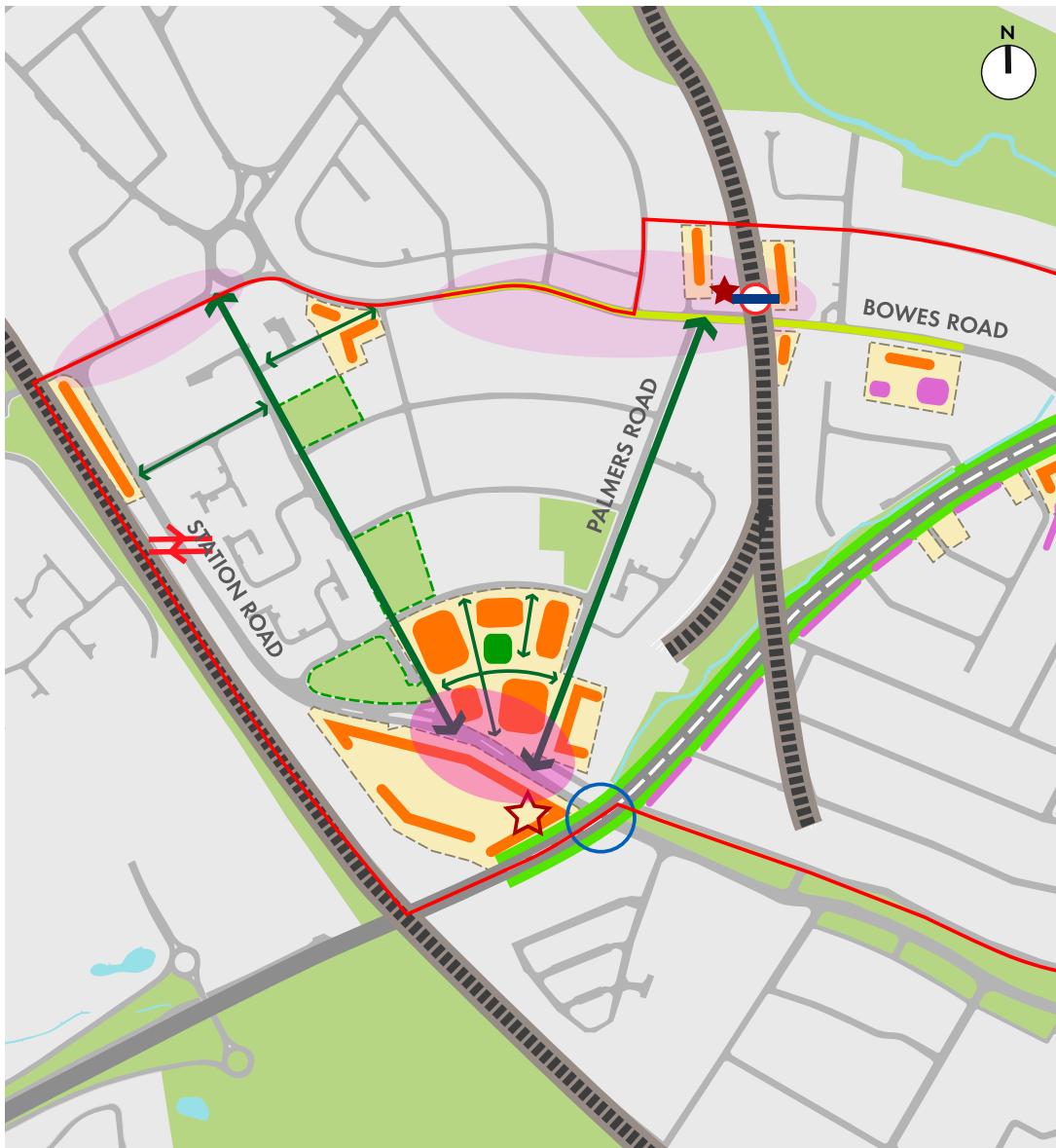
Q 23. Do you agree with the Three 'Neighbourhood Places' approach?

Q 24. Have we identified the right places?

4.2 COMMUNITY LIFE

It is paramount that new development in the NCAAP area is supported by appropriate levels of community infrastructure. Within the three Neighbourhood Places and their catchments there is already a range of community facilities, shops and services on which local people rely on a daily basis. However, there is a wider local network of facilities that meet the varied needs of local communities.

The plan opposite shows the range of services and facilities which already serve and support the AAP area. Naturally, some of these facilities are located in neighbouring Boroughs, across administrative boundaries but which boundaries that have little bearing on the day to day lives of local people.



-  Existing local centres
-  New/improved connections
-  Development sites
-  Refurbished sites (purple line)
-  Improved public open space
-  New local centre
-  Potential landmark building
-  Existing landmark building
-  TfL road improvements (white dash) and junction improvements (blue circle)

Left: Arnos Grove/New Southgate Neighbourhood Place

4.3 NEW SOUTHGATE/ARNOS GROVE

The adopted New Southgate Masterplan SPD provides a detailed planning and development framework for this area. In direct response to that Masterplan, key site specific principles regarding the planned improvements, investments and developments in this location are as follows:

Routes and connections

1. Providing safe, convenient and good quality connections linking the new commercial centre at the southern end of Station Road with the surrounding residential area is a key priority. Key moves in this regard include extending Palmer's Road to meet with Station Road, and extending the High Road axis to Friern Barnet Road to the north and Station Road to the south.
2. A local network of streets will connect to the area's main through routes in order to create new connections and a more permeable and integrated neighbourhood. The creation of a new connection between Grove Road and Bowes Road is one such opportunity.

Structure and urban form

3. The regeneration of the Ladderswood Estate and the collection of Western Gateway sites are the key drivers to the regeneration and growth of the area.

4. The Western Gateway and Ladderswood Estate sites will deliver a new high quality and high density mixed use neighbourhood with the focus being on ensuring new developments provide an active edge to Station Road.
5. A series of blocks will be created with buildings heights generally rising from existing prevailing domestic heights found in The Limes to new high density development of up to nine storeys closest to the Station Road junction with the A406.
6. It is appropriate for new taller buildings to occupy prominent gateway sites across the area such as on the land adjacent to New Southgate Station and at the southern end of Station Road. However, in general terms and where the relationship between new and existing buildings is more sensitive, the height of new development should respond to the site's immediate context.
7. Part of the New Southgate Industrial Estate will be released for residential development to facilitate the regeneration of the area and the delivery of the housing growth envisaged.
8. The remaining part of the industrial estate will be improved in terms of access and environmental quality.



Above: Arnos Grove station



Above: Arnos Grove Library and swimming pool





Above: Arnos Grove local centre



Above: Arnos Grove interchange

9. The existing surface car parks either side of Arnos Grove Station present a mixed use sustainable development opportunity. A careful, responsive, respectful and high quality design solution will need to be found which preserves or enhances the setting of the Grade II listed station building. The levels across the site would enable the consolidation of car parking spaces on a decked structure on the land to the east of the station. This would release the land to the west to make a more positive contribution to the Arnos Grove local centre with commercial uses strengthening the retail frontage of Bowes Road in this location. Residential development that responds positively to both this sensitive historic context and this sustainable location would be appropriate above the commercial ground floor and behind the commercial frontage.

Activities and uses

10. A new mixed use commercial centre will be provided at the southern end – and on both sides of – Station Road providing a range of retail and community uses. The majority of new commercial development, anchored by a small/local supermarket, will be on the southern side of Station Road.
11. Investment at Garfield Primary School may be required to deliver an additional form of entry to meet a growing need for primary school places.

12. The collection of community uses including the swimming pool and health centre to the east of Arnos Grove station will be retained and improved where possible.

13. The redevelopment of Coppicewood Lodge provides the opportunity for the provision of a new residential accommodation and, if required, a new health facility. In addition, a new pedestrian route between Grove Road and Bowes Road will better connect the wider area to Arnos Grove.

Open space and public realm

14. At Arnos Grove Station the priority will be the improvement of the space immediately in front of the station and along the Bowes Road commercial frontage in this location. This would be facilitated by the potential redevelopment of the site on the western side of the station on the basis that the public commuter parking spaces can be reprovided and consolidated on the site to the east of the station.
15. The environments around the existing estates of Highview, Red Brick and High Road will be improved.
16. Open space with the area will be protected and improved including the provision of new play space on High Road open space, retention of and improvements to Millennium Green and other opportunities identified in the New Southgate Masterplan.





Above: Pymmes Brook in Arnos Park



Above: Site of the old play area in Arnos Park



Above: Access to Arnos Park

17. Landscaping improvements should be delivered along Telford Road in conjunction with the refurbishment of these properties. In relation to the properties themselves, appropriate boundary treatments should be introduced to provide a clear distinction between public and private space and allow for front gardens to provide some shelter and protection for residents from the road environment.



25. What are your views on this draft guidance for the New Southgate/ Arnos Grove area?

26. Have we identified all the required improvements for this area?



Existing local centres



New/improved connections



Development sites



Refurbished sites (purple line)



Relocated primary school



Refurbished building (old school)



Potential landmark building



Improved local centre public realm (tree planting, paving etc)



TfL new crossings



TfL road improvements (white dash) and junction improvements (blue circle)



Possible new link between the schools and the local centre

Left: Bowes Road Neighbourhood Place

4.4 BOWES ROAD

Key site specific principles regarding the planned improvements, investments and developments in this location are as follows:

Routes and connections

1. TfL's safety and environment scheme delivers significant improvements to pedestrians and cyclists along this stretch of the A406 particularly at key junctions - this will help reduce the severance previously found along this stretch of the North Circular Road.
2. The land between the A406 and Broomfield Secondary School presents an opportunity for the introduction of new mews-style family dwellings. This in turn provides the opportunity for a new public pedestrian and cycle route, overlooked with new development along its length, to better connect Wilmer Road and Arnos Grove local centre beyond with the Bowes Road local centre.
3. The area is generally deficient in public open space, particularly to the south side of Bowes Ward. Establishing improved crossings and access to Broomfield Park and improving the access and environment around the New River Path provides an opportunity to mitigate against this deficiency.



Above: Bowes Road local centre



Above: Local shop

Structure and urban form

4. Sites along the North Circular Road frontage provide a major opportunity to deliver significant housing growth in the area with the provision of new high quality housing designed specifically to respond positively to the site conditions. New housing development should provide an active face to the A406 corridor with the provision of doors and windows facing the road.
5. This stretch of the North Circular Road suffers from a lack of variety and character – an issue identified in the Enfield Characterisation Study. There are a number of opportunities to improve the character of the area by animating the corridor and providing variety in built form at appropriate locations. The junction between Telford Road and Bowes Road provides one such opportunity where the existing housing fails to provide sufficient enclosure or definition to this major junction. New development should respond to the special conditions at this corner site with high quality development which marks this transition from one part of the corridor to another.

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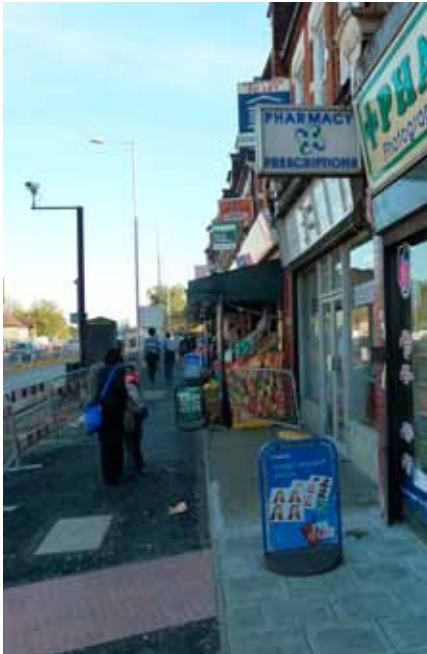
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Above: Bowes Road local centre



Above: Junction of A406 and Brownlow Road

6. The southern edge of Broomfield Secondary School on land between the existing dwellings facing south along the A406 provides an opportunity to introduce a run of mews-style family dwellings accessed off Wilmer Way. Care will need to be taken to ensure the relationship between the backs of the existing houses and the fronts of the new dwellings is appropriate in terms of residential amenity. Direct public pedestrian and cycle access to the Bowes Road retail parade should be provided.
7. In the longer term, development options could be considered which involve the redevelopment of the Ritz retail parade and the reprovision of a new commercial parade of shops which benefit from better parking facilities, better access arrangements and a better relationship with the A406. This would involve a number of land owners coming together. There may be an opportunity to create a new access to a new all-age school on the site of Broomfield Secondary School to the west of the Ritz Parade although the traffic implications of this on the A406 would need to be explored carefully in liaison with TfL.

Activities and uses

8. The long term economic vitality and sustainability of the commercial premises at Bowes Road parades on both sides of the A406 is a key consideration to ensure many of the everyday shopping needs of local residents in this neighbourhood are met. In the longer term there may be an opportunity to redevelop the Ritz Parade on the north side of the A406 to further strengthen this local centre.
9. A small number of retail/commercial units are located between Moffat Road and Pymmes Road, though these are largely vacant. There could, therefore, be the longer-term opportunity to relocate these uses around the junction of the North Circular Road and Powys Lane in order to strengthen the local centre and reduce the stretched nature of commercial uses in this area.
10. There is an opportunity to provide a new all-age school on the site of Broomfield Secondary School. This would release the site of the existing Bowes Park Primary School, occupying a listed building, for a potential high quality residential conversion.





Above: New River Path, north of the A406, towards Palmers Green



Above: Poor access to rejoin New River Path



Above: New at-grade road crossing

11. There are a number of additional housing development sites on the north side of Bowes Road between Powys Lane and Pymmes Close. Whilst these sites provide a valuable opportunity to provide new housing in the area, the prime consideration here will be the protection of existing residential amenity of neighbouring dwellings.

Open space and public realm

12. The area is deficient of public open space. New developments should contribute to the improvement in the quality of existing open space, such as Broomfield Park, and in the public accessibility of routes along the waterways in the area, particularly the New River Path and Pymmes Brook Trail. These are an undervalued but significant environmental and ecological asset for the area.

13. North Circular Road should incorporate an improved public realm with tree planting along both sides. This will help ensure the environmental impact of the busy A406 corridor is mitigated against for the benefit of new residential development as well as existing communities.



27. What are your views on this draft guidance for the Bowes Road area?

28. Have we identified all the required improvements for this area?



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- Existing local centres
- New/improved connections
- Development sites
- Refurbished sites (purple line)
- Refurbished buildings/new development at library site
- Potential landmark building
- TfL road improvements (white dash) and junction improvements (blue circle)
- TfL new crossings
- Improved local centre public realm (tree planting, paving etc)

Left: Green Lanes Neighbourhood Place

4.5 GREEN LANES

Key site specific principles regarding the planned improvements, investments and developments in this location are as follows:

Routes and connections

1. TfL's safety and environment scheme delivers significant improvements to pedestrians and cyclists along this stretch of the A406 and, in particular, at its key junctions
2. Sites coming forward along Green Lanes should strengthen this important commercial route with a strong commercial frontage.
3. The area is traversed by both Pymmes Brook and the New River. Opportunities to improve the public access and environmental quality of these routes should be taken as they arise. These improvements will help mitigate against the identified local deficiencies in access to public open space

Structure and urban form

4. The site on the north east corner of the A406 and Green Lanes junction provides a major opportunity for a new commercial development to address, and provide activity and interest to, this major junction. The form of any new development here should address both the site's A406 and Green Lanes frontages.

5. The commercial frontage on the south west side of the junction contributes positively to the character of the area and should be retained and refurbished where possible. Given the strong building line associated with the existing commercial parade, the site immediately to the west of this corner parade would be appropriate for new housing development which provides a positive frontage to the A406.
6. This is a prominent and important junction along the A406 corridor and new development should respond positively to this context.
7. Additional opportunities exist on the west side of Green Lanes north of the A406 for mixed use development with a commercial ground floor and residential uses above to extend and repair the high street character of this part of Green Lanes. New development should respect the heights of adjacent buildings along Green Lanes whilst taking the opportunity to animate the A406 corridor and acknowledge the importance of this major junction.



Above: Junction of A406 and Green Lanes



Above: Green Lanes local centre





Above: Green Lanes local centre



Above: Potential site fronting the A406

Activities and uses

8. New development should focus on the strengthening of the commercial uses along Green Lanes both north and south of the A406.
9. The former Labour Exchange site on the south east corner of the junction presents a valuable opportunity for new commercial and residential uses to strengthen the commercial character of this area. Access to the site is difficult and it would be beneficial if sites adjacent also came forward to redevelopment at the same time. Notwithstanding this, it is important that new development presents an active edge to the North Circular Road in this location and therefore acts as an extension to the existing commercial uses on the corner with Green Lanes.
10. The Southgate Town Hall and Palmers Green Library building is a valuable local landmark and should be retained and kept in community use. The site presents an opportunity to improve the quality of community facilities serving the local community and introduce new enabling uses on the site. More detailed guidance is provided in the draft development brief for the site which was recently consulted upon. The site may also be considered appropriate for a new health centre should that need arise.

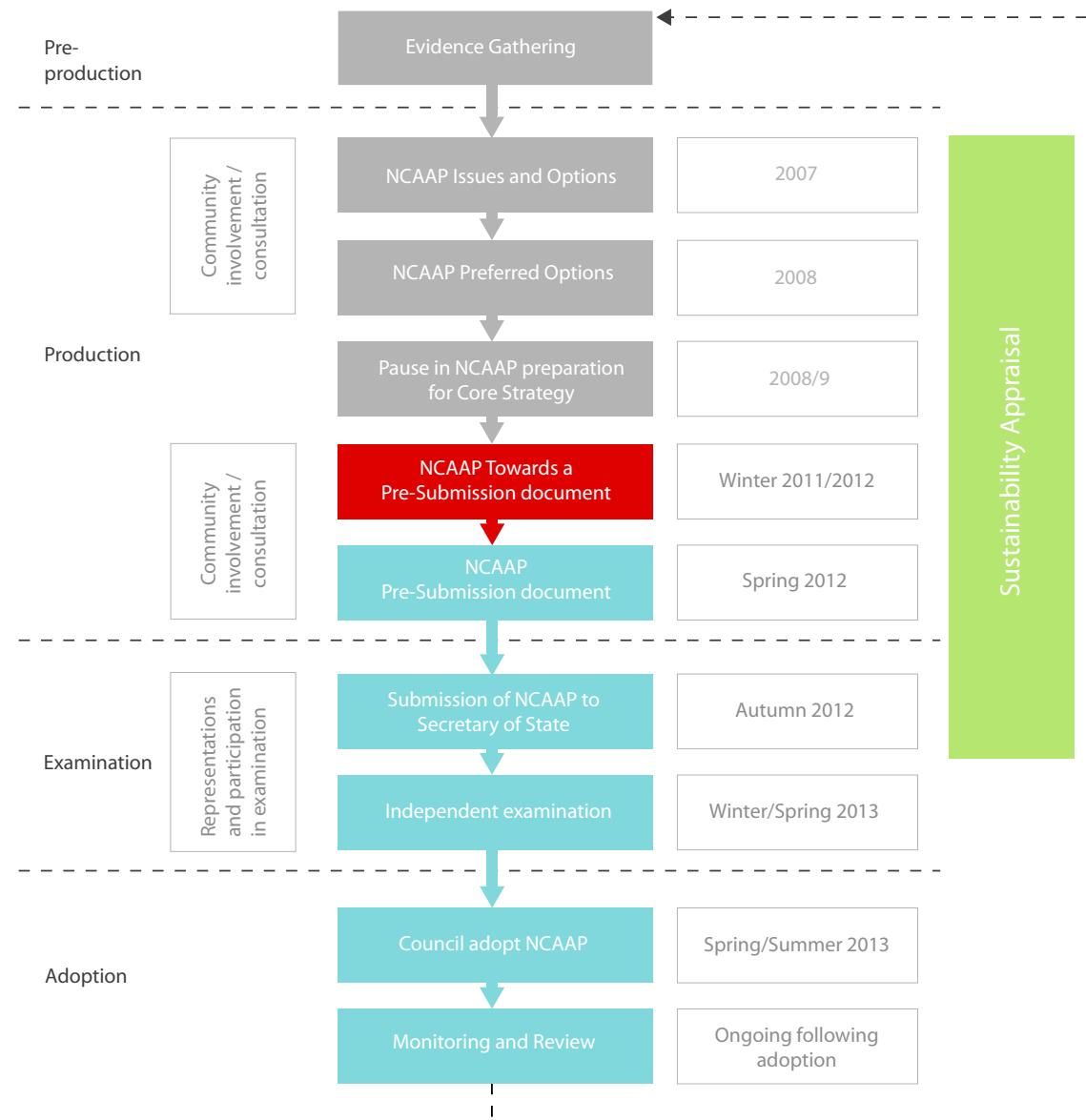
Open space and public realm

11. The public realm along Green Lanes should be improved incorporating improved paving and new tree planting where appropriate. Green routes in the area should be strengthened, particularly the New River Path and other waterways.
12. While currently privately owned, the open space adjacent to Cherry Blossom Close which may provide an opportunity to provide a new public open space and help alleviate the deficiency of open space in the area.
13. Boundary Playing Fields should be improved as an important local open space and local play area.



- 29. What are your views on this draft guidance for the Green Lanes area?**
- 30. Have we identified all the required improvements for this area?**

THE PRODUCTION PROCESS OF THE NORTH CIRCULAR AREA ACTION PLAN (NCAAP)



5 NEXT STEPS

5.1 CONCLUSION

This document is intended to bridge the gap between where the NCAAP was left in 2008/9 and now. The Council and its partners have prepared this document to ensure that high quality regeneration, including new housing, new community facilities and environmental improvements are delivered in the area.

The emerging content aims to provide a spatial, neighbourhood place-making approach to the NCAAP by identifying three Neighbourhood Places - these places will be the focus for regeneration and new development, including community infrastructure.

This document raises a number of important issues and includes some critical questions we are seeking your views on. We may have missed some issues too, so if we have, let us know.

Comments should be sent to:

ldf@enfield.gov.uk

or

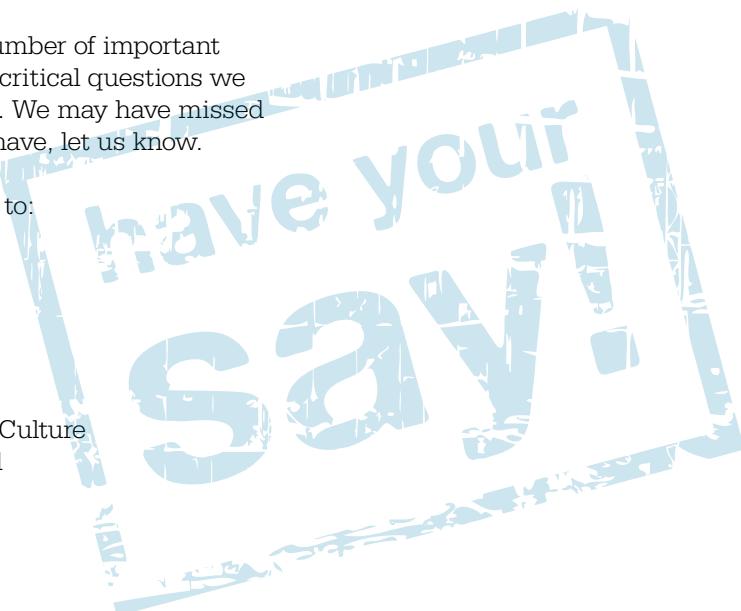
Planning Policy Team
Regeneration Leisure and Culture
London Borough of Enfield
Civic Centre
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Middlesex
EN1 3XA

5.2 NEXT STEPS

This document is subject to public consultation from Tuesday 22nd November 2011 to Friday 10th February 2012.

The views received will feed directly into the preparation of the NCAAP Pre-submission document, which will contain draft planning policies.

This document will be subject to another round of consultation on the NCAAP Pre-submission document in spring 2012.



**Allies and Morrison
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