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 London Borough of Enfield
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28 December 2013

Dear Mr Bean,

North Circular Area Action Plan Examination

Please find attached our response to the Inspector’s invitation, issued at the examination on 10th December 2013, to comment further on the NCAAP. The Inspector indicated that under the new planning framework arrangements, in preparing his report his focus would be on how far LBE had fulfilled its duty to cooperate and the extent to which the Plan met the criterion of sustainability.

1. The NCAAP is thin and disjointed as an “Action Plan” supposedly aimed at the regeneration of a long-neglected area. Many of its “policies” are little more than hopes, not least in the field of employment. Much depends on the different agendas of bodies other than LBE – for example, Transport for London (its A406 “improvements” were made without careful coordination with prospective “opportunity sites”): Notting Hill Housing Trust (with its own housing agenda) and neighbouring boroughs (likewise in respect of school places). LBE’s ability/power to influence these bodies is manifestly weak. As the attached analysis shows, many of the policies are unspecific and simply aspirational.
2. Furthermore, LBE appears to regard the Plan as irrelevant since NHHT planning applications have been regularly approved by the LBE Planning Committee well before the completion of the Plan’s approval/adoption process. It is clearly unsatisfactory in this context that where these applications involve issues of “high quality design” and architectural sensitivities, these are deemed matters for the subjective judgement of Council officials.
3. The credibility of the Plan is further undermined by the extensive examples of LBE’s failure to listen to public opinion and constructive inputs by local residents. Of particular concern is the focus on high density housing, pushed ahead of the provision of corresponding infrastructure and amenity.
4. The Plan exhibits little in the way of a vision for the NCR area. It is clear that no coherent overview has been taken (see para 1 above). In the Inspector’s words LBE’s “vulnerability to the pressures of the development industry” will be plain for all to see if a Parisian-style *banlieu* emerges over the next few years. Moreover, there is a similar lack of a strategic development vision – beyond additional housing for the Borough as a whole.

Yours etc

Caroline Chenier

Derek Honnor

Roger Blows

Chair, BHORA

Resident

Resident

**North Circular Action Plan
Issues for consideration of Inspector**

Policy	Weaknesses	Suggestions for Change
<p style="text-align: center;">1 Page 19</p>	<p>The assumption is that neighbourhood = community.</p> <p>The neighbourhoods were defined by consultants neither in dialogue with residents or by residents themselves. There was no meaningful consultation.</p> <p>The Bowes Road “community” is not coherent owing to the A406 cutting it in two.</p> <p>The policy postulates a “high quality environment”, but the area is blighted by an urban motorway that is the most polluted in London.</p> <p>“... residents will support the network of centres which provide for the day to day retail and community needs of the area.”</p> <p>No shops or services are even mentioned.</p> <p>These issues impact both Co-operation and Sustainability.</p>	<p>The Bowes Road Neighbourhood should be divided into two, one to the north of the A406, and one to the south. The A406 will always divide as noted in the 2011 Characterisation Study.</p> <p>The NCAAP needs to assert that there will be shops and services in these centres.</p>
<p style="text-align: center;">2 Page 25</p>	<p>New and Refurbished Homes:</p> <p>Regenerate the Ladderswood Estate. Ladderswood is not part of the NCAAP</p> <p>Selective refurbishment and new development along the A406 will have an equally significant impact on the area and address blight created by uncertainty over the years.</p> <p>Regeneration and</p>	

	<p>refurbishment is welcome. This goes to the heart of the scheme, so residents' views should be given higher priority.</p> <p>Other potential sites with potential to contribute to the regeneration of the area are at Arnos Grove station and Southgate Town Hall.</p> <p>No plans have been forthcoming for Arnos Grove Station, but building on one of the car parks there will halve car parking capacity and severely impact amenities for local people and commuters further afield.</p> <p>Regarding the Southgate Town Hall Site plans are awaited for housing development and library regeneration.</p> <p>In both cases This impacts Sustainability and Co-operation.</p>	<p>The NCAAP needs to say that consideration is being given to development at Arnos Grove Station, but that there will be wide public consultation before a decision is taken.</p> <p>A commitment about the provision of community space and the future of the children's library should be included.</p>
<p>3 Page 30</p>	<p>Creating and Protecting Jobs:</p> <p>Redevelop the old Labour Exchange and create offices and/or other commercial uses to create jobs.</p> <p>"In addition the following sites are identified for mixed use or non-residential development through which the creation of local jobs will be a priority." The sites appear to be at Ladderswood, Arnos Grove Health Centre, a Community Centre at the junction of Wilmer Way and Bowes Road, Ritz Parade, and Southgate Town Hall.</p> <p>This is just a vague promise that goes to the heart of the NCAAP. The regeneration is</p>	<p>This is all too vague. The report needs to set an outline of the sort of jobs that will be created and whether they are permanent or temporary. A target estimate of numbers would concentrate the mind of planners who implement this plan.</p> <p>Public consultation should be promised.</p> <p>The piece that talks of the "significant New Southgate Industrial Site", which will be lost to housing regeneration should be deleted. Something much more positive needs to be included which indicates LBE help with relocation of businesses to avoid the loss of jobs.</p>

	<p>said to be housing-led, but there is an absence of jobs.</p> <p>Clearly this affects Sustainability.</p>	
<p>4 Page 31</p>	<p>Local Education: Although the NCAAP talks of expanding Garfield Primary and Broomfield Secondary, liaising with neighbouring boroughs about provision LBE appears to be relying on other boroughs for school places.</p> <p>The main problem is in Southgate Green ward where demands impact both Bowes and Palmers Green wards. It is usual to expect to be able to walk to one's local Primary, but this is not possible for many in Southgate Green.</p> <p>Provision of school places is key to sustainability.</p>	<p>The NCAAP should commit to expanding Primary education in Southgate Green ward.</p> <p>If sustainability relies on other boroughs what will happen if Haringey and Barnet change their policies and stop helping LBE? What will LBE do then? This needs to be clarified in the NCAAP.</p>
<p>5 Page 32</p>	<p>Healthcare: New walk in centre at Coppicewood Lodge.</p> <p>New medical centre at Southgate Town hall.</p> <p>There are conflicting interests at Palmers Green Library. Bowes councillors want a medical centre, the community asked for community space and housing development will mean that the successful children's library will be relocated.</p> <p>This issue impacts sustainability and co-operation.</p>	<p>There is pressure on the space available and the NCAAP should identify the priorities for allocation of space and what public consultation will be undertaken.</p>
<p>6 Page 33</p>	<p>High Quality Design of New Development: "New development and public realm interventions will be</p>	<p>The NCAAP proposes developments which the public oppose and no attempt has been made to meet public</p>

	<p>high quality and design-led ...taking careful account of urban context and reinforcing local distinctiveness.</p> <p>The NCAAP acknowledges that the character of the area is suburban, yet the policy talks of “taking careful account of urban context and reinforcing local distinctiveness.”</p> <p>Building blocks of flats will not reinforce local distinctiveness; it will change it entirely against the wishes of local residents. At a meeting on February 28th called by the Planning Committee residents were asked to indicate whether they approved of two developments that were soon to be decided. This packed meeting voted unanimously against the developments proposed, but their views were subsequently discounted and plans approved. It has to be said that LBE just has not listened to the public at all.</p> <p>This impacts both co-operation and sustainability.</p>	<p>concerns. So, what is the point of offering constructive criticism when the scheme as written will be forced through?</p>
<p>7 Pages 33/5</p>	<p>Building Heights and Development Densities:</p> <p>Building heights should generally respect and respond positively to local context. Taller buildings are generally only considered appropriate within identified centres ...</p> <p>As designed buildings are above the recommended two storeys.</p> <p>It is curious that this policy doesn't talk about densities at all.</p>	<p>Building heights on buildings proposed exceed the guidance in the NCAAP so what is the point of making helpful suggestions?</p> <p>The inclusion of statistics on the changes in densities by Ward and Site would be helpful as would an explanation how LBE</p>

<p>The effect of the proposed development will be to increase the population of Southgate Green ward by over 25%.</p> <p>According to 2011 census figures the densities were : London: 52 people per hectare, Enfield Borough 38.7, Bowes Ward 94.6 and Southgate Green Ward 52.7. Why Southgate Green has been picked out for such an increase in population without providing the accompanying services when other Wards clearly have far less population density remains a complete mystery.</p> <p>Considering specifics there is a real problem with using PTal's. This approach alone just does not highlight pockets where large numbers are to be packed in like Site 13.</p> <p>This impacts co-operation since the public's views have been ignored and it impacts sustainability because the population is to increase substantially without supporting services being in place.</p> <p>Taller buildings should positively support the legibility and economic vibrancy of ... the area generally whilst protecting the amenities of existing residents and businesses. "Economic vibrancy" is a good phrase, but as there are no proposals for shops or services from where will this economic stimulus arise? This impacts sustainability.</p> <p>The designs suggest that all that we will see at main junctions are blocks of flats which will be legible, but inappropriate in our suburban</p>	<p>justifies cramming people in all the development sites.</p>
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	<p>area.</p> <p>There are a number of points of transition across the NCAAP area where taller buildings would help aid legibility and ... help mitigate the environmental impact on existing communities ...</p> <p>In the designs all these tall buildings conform to the same look – just bog standard ugly constructions. Our area will certainly become distinctive for the wrong reasons!</p> <p>This impacts sustainability.</p> <p>Away from these appropriate locations new development should not exceed the predominant building height in the local vicinity, and in most cases this will be two storeys.</p> <p>Of course, the proposals ignore this directive!</p>	
<p>8 Page 35</p>	<p>Transport & Movement</p> <p>Talks of cooperation between LBE & TfL on assessing the efficiency of the strategic road network and the impact on the nearby road network: Also, of the implanted Safety and Environment scheme.</p> <p>There has been no fair balance of interests between local residents and motor traffic and the A406 is more of a physical divide than ever despite additional pedestrian crossing points.</p> <p>We are even more concerned at speeding on the A406. There are no signs indicating the speed limits and from observation it is clear that speeds up to 60mph are common on the Bowes Road section where three young</p>	<p>The assertion in the NCAAP that the NCR is “ an integral part of the public realm ” is both obvious and meaningless, so could be deleted.</p>

	<p>people lost their lives on 23rd December 2013.</p> <p>This all throws into question the sustainability of the “three neighbourhood centres.”</p>	
<p>9. Page 37</p>	<p>Environmental Mitigation, Air Quality and Noise Pollution.</p> <p>This section talks of new buildings addressing the A406 with windows and doors facing and accessed directly from the main road. Also, positioning living and sleeping accommodation away from the most polluted side of the development with cleaner air to be drawn from the less polluted side of the development and pollution mitigated by landscape and biodiversity proposals.</p> <p>This is a scandalously feeble and misconceived set of observations that does not amount to a “policy” worthy of the name. This road is the worst polluted in London and LBE admits to being powerless to improve air quality and noise pollution on the road. Yet, LBE is intent on forcing increasing numbers of people to be subjected to this pollution.</p> <p>Mitigation of pollution of various kinds is seen here only in terms of building layout as proposed by NHHT – buildings that are purportedly designed simultaneously to front and face the NCR and yet to turn their backs on its aggressive features.</p> <p>References to landscaping and biodiversity are laughable. The scruffy, poorly maintained low-growing shrub borders and</p>	<p>This “non-policy” needs to be re-written to set out clear a clear policy to improve air quality and noise, which cannot be ignored by councillors on the Planning Committee when they decide whether to give planning applications the go-ahead.</p>

	<p>immature broadleaf trees are evidence of LBE's failure to persuade TfL to meet a reasonable standard. Indeed, far from generating biodiversity LBE/TfL are axing mature trees along Telford Road.</p> <p>Like the rest of the North Circular Road cosmetic "improvements" these features have been done on the cheap, as witness, also, the poor quality of the road surface which is breaking up.</p> <p>Clearly this can in no sense be described as sustainable.</p> <p>As to cooperation the public has pointed up these issues all to no effect.</p>	
<p>10 Page 39</p>	<p>Open Spaces, Waterways and the Blue Ribbon Network</p> <p>This section talks of improving the quality of the existing open space network and, as a priority, to improve the network of spaces alongside the area's waterways.</p> <p>The NCAAP offers no new open spaces for a greatly enhanced population in an area that admits it is deficient in open spaces. Any increment will be dependent on active cooperation with agencies such as British Waterways and Thames water. Given the failure of LBE cooperation with TfL (see above) expectations cannot be high.</p> <p>Insofar as the concept of district heating is a relevant factor in this context, the in-fill piecemeal approach of LBE/ NHHT does not appear to have permitted any strategic thinking about sustainable energy</p>	

	<p>sourcing.</p> <p>The opportunity to create state of the art affordable housing of genuine sustainable quality has been dodged in the interest of a developer's cheap, high density quick build.</p> <p>All these issues relate to questions of future sustainability.</p>	
<p>11 Page 45</p>	<p>Three Neighbourhood Places</p> <p>The NCAAP proposes three Neighbourhood Places, each serving its own community.</p> <p>At best this is barely a policy, more a form of dressing up a developer's ambition and as described in the NCAAP little more than an urban theorist's dream.</p> <p>The three centres are not kindred in character and amenity, other than all being cut through by the NCR.</p> <p>Arnos/Ladderswood could, perhaps, become a cohesive and sustainable community, but that is less true of the Green Lanes extended "traffic and shopping" area and less still of the fragmented Bowes Road neighbourhood. The Bowes concept is clearly the weakest . Under the NCAAP it has least chance of becoming more sustainable as the prospect of high density housing units at various points will not improve the position. It is in no sense a tangible community having little in the way of community and entertainment space nearby, open spaces and employment sources other than minor retail,</p>	

	places of worship and sports facilities. It was a pity that the Consultants who wrote the first draft did not consult the public.	
12 Page 53	Arnos Grove/New Southgate Neighbourhood place	
13	Ladderswood Estate	
14	Western Gateway	See policies forming part of the New Southgate Masterplan
15	New southgate Station	See policies forming part of the New Southgate Masterplan
16	Coppicewood lodge Care Home	See policies forming part of the New Southgate Masterplan
17	Arnos Grove Station	See policies forming part of the New Southgate Masterplan
18	Arnos Pool, Bowes Rd library & Arnos Grove Medical centre	See policies forming part of the New Southgate Masterplan
19	Bowes Road Neighbourhood Place	See policies forming part of the New Southgate Masterplan
20 Page 71	<p>Telford Road Sites</p> <p>This is a key junction and “point of transition” along the A406 and development should respect the prevailing local character of the area.</p> <p>This development has already been approved.</p> <p>It was rejected by the public at a meeting on 28th February 2013 and at the Planning Hearing in April.</p> <p>The “local character of the area” has been entirely ignored.</p>	The idea that “new infill development provides the opportunity to help mitigate the impact of The North Circular Road on existing housing in adjacent streets” needs to be explained in terms of those “impacts”.
21 Page 71	<p>Telford Road/Bowes Road Corner Sites</p> <p>A junction and “transition point” where new development should help define and enclose the junction. Key points:</p> <ol style="list-style-type: none"> 1. A range of housing types. 2. Development of up to 	There is no point in re-drafting at all as the proposal has already been approved.

	<p>5 storeys.</p> <ol style="list-style-type: none"> 3. Protect amenities of existing residents. 4. Design to respond to landscape, views, approach. 5. Ensure pedestrians feel safe and comfortable. 6. Design and landscaping to help mitigate against noise and air pollution. <p>As to sustainability this development is dire. It is on a dangerous bend on the A406, there is inadequate parking provision and there are safety issues for pedestrians and motorists. The outlook from the development is grim and the new development will impact adversely on the people nearby.</p>	
<p>22 Page 73</p>	<p>Bowes Road/Wilmer Way Sites</p>	
<p>23 Page 75</p>	<p>Ritz Parade</p> <p>The NCAAP says that “mixed use opportunities exist on either side of the central section of the parade and that the key principles include retention and strengthening of the commercial frontage, a new food–store to the west with parking at the rear and two storeys of flats above. It is similar to the east with commercial premises at ground level and two storeys of flats above.</p> <p>The NCAAP also says that “if a comprehensive development of the whole parade is promoted … a planning /development will be required, which should be “prepared with the benefit of the active involvement of the local community.”</p>	<p>Plans need to be discussed with the public ASAP and the NCAAP updated in the light of agreed solutions to redevelopment, which should include directions for implementation that can be understood by LBE Planning Committee.</p>

	<p>Here too is a “policy” which barely warrants the name. LBE has no means of ensuring the future of Ritz Parade, a key element in the future viability of the Bowes Neighbourhood Centre and the only major building of character apart from Bowes School along this stretch of the A406. It is already largely under the ownership of NHHT whose priorities have been shown not to coincide with those of local residents.</p> <p>A high degree of equivocation, uncertainty and speculation is evident in NCAAP’s references to Ritz Parade and its future is clearly at risk. Even the prospect of a Planning Brief should “comprehensive redevelopment” threaten does not inspire confidence. After all the Southgate Town Hall/Palmers Green Library Planning Brief leaves that site destined to be filled up by an as yet uncertain number of housing units.</p> <p>Clearly, public consultation is urgently needed. This has been long promised, but nothing has been heard and no plans seen. Also, The South–West Area Partnership Board is keen to see any plans before the public consultation and the membership of that body includes LBE councillors and officers , and commercial companies (including NHHT), but few residents.</p> <p>The development of this site is key to the definition of a Neighbourhood Centre and the promises made to the public must be honoured.</p> <p>If not, forget sustainability.</p>	
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<p>24 Page 77</p>	<p>Bowes Road Site (Powys Lane to Broomfield Road) This is Site 13 also known as Site 6</p> <p>A range of housing types is promised ...</p> <p>The “range” comprises blocks turns out to be of flats and “mews houses.”</p> <p>A lack of imagination was applied here. This site provided an opportunity to build terraced houses or two-storey flats along with some open space for residents.</p> <p>As it is the number of people to be crammed into this space is around 250% higher than the population that formerly lived in the same space and no additional services are planned.</p> <p>The reasons given for “mews houses” are weak. LBE has a policy against back-land development yet does the opposite here.</p> <p>At no point has LBE taken on board any of the suggestions made by the public or dealt with any of the concerns expressed by them. The community has said time and again that it does not want or support the development of back gardens and the building of “mews” houses in place of the existing gardens and access roads.</p> <p>Despite these protests and that of the Broomfield School Head (the school is next to one back land development) LBE continues to promote back</p>	<p>A complete redesign is called for here with terraced houses and open space for residents plus safe access to and from the site.</p>

	<p>land development in the NCAAP.</p> <p>Vehicle access is now solely from the A406 and risk assessments indicate that it will be dangerous for anyone entering or leaving the site across two lanes of fast moving traffic.</p> <p>Not only does this bring sustainability into question, but access for pedestrians and traffic is hazardous.</p> <p>As to co-operation, LBE has ignored all public representations about this site.</p>	
25 Page 85	Green Lanes Neighbourhood Place	
26 Page 87/88	Southgate Town Hall: See Policy 5	
27 Page 89	Green Lanes Sites	
28 Page 89	Green Lanes/A406 junction north	
29 Page 91	Green Lanes/A406 junction South-West	
30 Page 91	<p>Green Lanes/A406 junction South-East</p> <p>The development here is on the site of the old Labour Exchange with access from Princes Avenue.</p> <p>This appears a good site for redevelopment and access would be appropriate from Princes Avenue.</p>	

Policies that form part of The New Southgate Masterplan

An explanation is required in the NCAAP why these policies are now included when they were not in earlier drafts.

An explanation is required in the NCAAP why these policies are now included when they form part of a different plan altogether.

These policies have not been as widely discussed with the public as the rest, although they may have been discussed in New Southgate.

	Weaknesses	Suggestions for Change
14	<p>Western Gateway</p> <p>The NCAAP describes building a “Landmark Development” with blocks of 10 floors. To provide 360 dwellings.</p> <p>This is not a policy.</p> <p>The concept of a “landmark” structure is as questionable (and superfluous) and as empty as to the reference to “highest architectural quality,” an aspiration unlikely to be achieved on a through road such as the NCR. We doubt the ability of the LBE planning committee to identify high quality architecture. The prospect of Station Road becoming “less dominated by the car” looks less rosy when the road is hemmed in by 10-storey buildings.</p> <p>The issue of sustainability arises. No jobs are mentioned, no car parking, no shops.</p> <p>Also, why are there to be 10-storey blocks, which people don’t like when they are being knocked down all over London including Enfield to be replaced with terraced housing? It appears that LBE is 50 years behind the times in wanting to build 60’s style high rises. So is this concept itself even</p>	<p>This section needs to be re-written in order to specify what the “musts” are when implementing this scheme.</p> <p>Better, scrap these proposals and start again!</p>

	sustainable?	
15	New Southgate Station	
	<p>Proposes: improved public space at the station's entrance.</p> <p>High quality design which responds to the local context of Friern Barnet Road commercial frontage.</p> <p>Commercial/retail uses on Friern Barnet Road.</p> <p>Building heights on Station road to be 4–5 storeys with 80 new apartments.</p> <p>Building height of 6 storeys on Friern Barnet Road.</p> <p>There is no mention of car parking for residents or commuters. This is already an issue with commuters parking on Station Road and the roads on the estate to the east.</p> <p>It is not known what public consultation has taken place, nor what has taken place with Barnet Council whose land is on the opposite side of the railway line where there is a service road that could possibly accommodate some car parking..</p>	<p>More detail needed.</p> <p>It is not clear whether the existing buildings are to be replaced. More clarity is needed. What is the local context to which they respond?</p> <p>“Appropriate” needs definition.</p> <p>Also, where is the proposed local centre located?</p> <p>The density (people per hectare) should be included.</p> <p>Why are these buildings to be so much higher than height limits set elsewhere. A justification should be included.</p> <p>The NCAAP should embrace this issue and indicate how it is planned to accommodate car parking.</p>
16	<p>Coppicewood Lodge: This is included in Policy 5 also.</p> <p>Has potential for mixed use development to include:</p> <ol style="list-style-type: none"> 1. residential and community uses. 2. A pedestrian route from Bowes Road to 	

	<p>Grove Road. Building heights are to be 5 storeys which takes account of the former church building, dwellings on the east of Bowes Road, and others in the area.</p> <p>There is space for 23 dwellings.</p> <p>The only discussion of medical needs we are aware of has been at The South-West Partnership Board.</p>	<p>The height of the buildings on the east of Bowes Road are not 5 storeys high, so this needs to be explained.</p> <p>The increased density should be explained for this area and the ward.</p>
<p>17 Page 61</p>	<p>Arnos Grove Station Sustainable development around the station (a distinguished “landmark” building still to be bettered) would be dependent on speculative mutual LBE/TFL cooperation in the community’s interest .Restriction of parking at the station may well represent a closer alignment with The London Plan, but it will not get rid of the cars, many of which are those of out-of-town commuters joining the Underground system .</p> <p>Car parking at the station is essential as this is a key point where commuters access public transport. Both car parks are used 7 days a week by commuters, shoppers going to the West End and football supporters going to matches.</p> <p>The assumption is that parking capacity will not be lost, but it is not clear how 150+ spaces will be crammed into the existing second car park.</p> <p>No public consultation has taken place.</p>	<p>The NCAAP needs to assure the public that car-parking capacity at the station will not be reduced as a result of any development.</p> <p>Also, the NCAAP needs to say that any development needs to be subject of thorough and sensitive consultation with local residents and Piccadilly Line users.</p>

<p>18 Pages 61 & 65</p>	<p>Arnos Pool, Bowes Road Library and Arnos Grove Medical Centre (See also policy 5)</p> <p>New development would be required to protect and enhance the existing Grade II listed buildings.</p> <p>Opportunities:</p> <ol style="list-style-type: none"> 1. Extend the existing Medical Centre building to improve the range and quality of community facilities. 2. Any extension of the Medical Centre should be to the north of the existing building and improve the visibility and profile of the facilities from Bowes Road. 3. Any proposal for new development should include the retention of the existing open space and important landscape features and include a landscaping scheme that enhances the setting of the buildings. <p>No public consultation has taken place within the context of the NCAAP</p>	<p>The NCAAP should emphasise that an extension will be in keeping with the Grade II listed style.</p>