

**Local Development
Framework
Representation Report
Core Strategy
Pre-submission
Amendments**

Revised 30/09/2011

August 2011

The core of all representations received from the Core Strategy Pre-submission Amendments are included in this Representations Report. The full responses are available for inspection in the planning offices at North London Business Park. Please contact the Programme Officer – Mrs Vijaya Ram (Mobile: 077914 59178, Vijaya_ram@btinternet.com) to make an appointment to inspect the responses. The Inspector also has a full copy of all submissions received.

List of Representors - Core Strategy Pre-submission Stage

Representor Number	Title	Initials	Surname	Company/Organisation
541	Mr	Nick	Birkbeck	Environment Agency
542	Mr	David	Maxwell	Higgins Homes PLC
543	Mr	David	Hammond	Natural England London Region
544	Mr	Chetin	Malyali	Resident
545	Mr/Mrs		Jardine	Resident
546	Miss	Alessia	Piccii	Resident
547	Mr	Amilcare	Rossi	Resident
548	Mr	Simon	Appleton	Resident / Greensquare
549		Helen	Massey	Barnet Residents Association
550	Mr	Roger	Chapman	Finchley Community Development Trust
551	Mr	Matthew	Knight	Resident
552	Mr	Alun	Evans	Metropolitan Police Authority
553		Rose	Freeman	The Theatres Trust
555		Ken & Pat	Payne	Resident
556	Dr	Julia	Hines	Green Square Residents Association
558	Mr	Ben	Overlander	Resident
559		Katie	Benford	Asda Stores Ltd.
560		Rory	Joyce	The British Library
562	Mr	Patirck	Blake	Highways Agency
563				Bestway Holdings Ltd
564	Mr	Christopher	Pagonis	Resident
565				Bride Hall Holdings Ltd
566	Mr	Warren	Forsyth	Middlesex University
567	Mr	Glen	Rollings	Greater London Authority - Planning Decisions Unit
568	Mr	Philip	Murphy	Brent Cross Cricklewood Development Partners
569	Mr	Charles	Mills	Comer Group
570	Mr	Robert	Newton	Resident
571	Miss	Alex	Wilson	A2Dominion Housing
572	Mr	David	Howard	Federation of Residents Associations in Barnet (FORAB)
574	Mr	Graham	Saunders	English Heritage
575	Mr	M W G	Scott	Garden & Plant Centre Developments Ltd
576	Mr	Peter	Pickering	Finchley Society

Representation No: 541 / 1

Name : Mr Nick Birkbeck

Organisation : Environment Agency

Policy

Chapter:

Paragraph: AMENDMENT
337

Reason for Objecting or Supporting?:

This needs some clarification. The paragraph states that 'SUDS are not appropriate on land with high groundwater levels or clay soils which do not allow free drainage'. This is incorrect, infiltration SUDS such as soakaways may not be suitable in these conditions but there are lots of other SUDS techniques available which are suitable on various ground conditions. For example green roofs are appropriate where groundwater levels are high and attenuation in the form of ponds is also suitable on clay soils.

If you are Objecting, what changes are you seeking?:

Amend para 18.12.6

Council's response :

As part of Pre-Submission Further Amendments (Amendment 143) we agree to delete the sentence 'SUDS are not appropriate on land with high groundwater levels or clay soils which do not allow free drainage'.

Representation No: 542 / 1

Name : Mr David Maxwell

Organisation : Higgins Homes PLC

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

Revised Map 11 now correctly depicts Barnet's green spaces and play areas.

The revision to Map 11 relating to land to the rear of Briarfield Avenue accords with recommendations made by the inspector appointed to consider town or village green application number LCC/MM/004/2008, which was rejected.

If you are Objecting, what changes are you seeking?:

Council's response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 543 / 1

Name : Mr David Hammond

Organisation : Natural England London Region

Policy

Chapter: General comment

Paragraph:

Reason for Objecting or Supporting?:

Natural England is pleased to see the amendments in the document reflecting our previous comments, these comments are designed to help strengthen the biodiversity and ecological potential for the Borough. Helping to promote sustainable communities with access to a range of services, facilities and amenities.

The proposed amendments and changes are acceptable to Natural England and help the Borough to more fully meet the potential for biodiversity and ecology.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome this support

Representation No: 544 / 1

Name : Mr Chetin Malyali

Organisation : Resident

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

Re: Land to the rear of Briarfield Avenue

...Irrespective of whether the land is privately owned it has for the past 100 years been used for recreational use by members of the public and is still and has always has been open space. The cricket field on the plan is privately owned but still forms part of Barnet Open Spaces and is included on Map 11...

Original Map 11 as agreed with outside consultants Arup & Co incorporated land as open space at rear of Briarfield Avenue. Residents took part in consultation over a period of six months. Irrelevant to national policies if land is private or public, objectors, Higgins have had Map 11 altered to remove open space at the rear of Briarfield.

If you are Objecting, what changes are you seeking?:

Restore Map 11 open spaces of Barnet as originally draft. All open space both private and public to be included as per original open space map. This will make the DPD compliant and sound.

I would ask you to reconsider this matter and reinstate the original Map 11 so that the onus of having it removed will rest upon Higgins rather than ourselves. The whole point of the audit was to include pieces of land like this, we fulfilled the criteria.

Council's response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 545 / 1

Name : Mr/Mrs Jardine

Organisation : Resident

Policy

Chapter:

Paragraph:

Map 6

Reason for Objecting or Supporting?:

REF: land to the r/o Rosemary Avenue, Briarfield Avenue, Dudley Road, 7 Tangle Tree Close N3

We believe the DPD published in May 2011 is unsound for the following reasons:

It is inconsistent with PPG17; in as much as the audit carried out by the local authority was not of good quality as set out by para 5 of PPG17, as it only covered open space with public access.

Whereas PPG17 defines a wider definition of open space;

- PPG17 Annex: Definitions on Open Space at 3(vi); states that access is not a pre-requisite for inclusion as a visual amenity, under the umbrella of open space.

We say that as the land mentioned above has openness, contrast and tree cover within a residential area, falls under the category for "visual amenity greenspace".

- PPG17 adds at 2(ii) open space can also be natural and semi-urban greenspaces and at (v) amenity greenspace around housing.

If you are Objecting, what changes are you seeking?:

Our reason for writing is that originally the land was indicated on Map 11 but has now been removed after an objection from the land owner, highlighting the private ownership of this land that up until the new owners acquired it was open to the public for almost 100years.

The land is now in modern terms SLOAP but this was created 100 years ago and if the land is now private it should not detract from protection by inclusion as "visual amenity open space" and shown either on Map 11 - its original designation or possible Map 6 Barnet's Natural Green Spaces.

Council's response :

Map 6 shows Barnet Urban Areas outside of Regeneration and Development Areas, Conservation Areas and Green Belt.

Map 12 shows Barnet's Natural Spaces - land that is of Nature Conservation Importance.

Neither Map 6 nor Map 12 have been subject to Pre-Submission Amendments. Therefore this objection is not duly made.

The issue of Map 11 is addressed at 545/2

Representation No: 545 / 2

Name : Mr/Mrs Jardine

Organisation : Resident

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

Our reason for writing is that originally the land was indicated on Map 11 but has now been removed after an objection from the land owner, highlighting the private ownership of this land that up until the new owners acquired it was open to the public for almost 100years.

The land is now in modern terms SLOAP but this was created 100 years ago and if the land is now private it should not detract from protection by inclusion as "visual amenity open space" and shown either on Map 11 - its original designation or possible Map 6 Barnet's Natural Green Spaces.

REF: land to the r/o Rosemary Avenue, Briarfield Avenue, Dudley Road, 7 Tangle Tree Close N3

We believe the DPD published in May 2011 is unsound for the following reasons:

It is inconsistent with PPG17; in as much as the audit carried out by the local authority was not of good quality as set out by para 5 of PPG17, as it only covered open space with public access.

Whereas PPG17 defines a wider definition of open space;

- PPG17 Annex: Definitions on Open Space at 3(vi); states that access is not a pre-requisite for inclusion as a visual amenity, under the umbrella of open space.

We say that as the land mentioned above has openness, contrast and tree cover within a residential area, falls under the category for "visual amenity greenspace".

- PPG17 adds at 2(ii) open space can also be natural and semi-urban greenspaces and at (v) amenity greenspace around housing.

If you are Objecting, what changes are you seeking?:

Re-instatement of land to Map 11 as "Visual amenity green space"

Council's response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 546 / 1

Name : Miss Alessia Piccii

Organisation : Resident

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

RE: AREA BEHIND BRIARFIELD AND ROSEMARY AVENUE LONDON N3

It is very important for us residents, we have young families and green spaces are vital.

If you are Objecting, what changes are you seeking?:

With reference to the above, We strongly support the views expressed by the Residents Association and we would be most grateful if the area is reinstated and plotted on Map 11 as green area.

Council's response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 547 / 1

Name : Mr Amilcare Rossi

Organisation : Resident

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

AREA BEHIND BRIARFIELD AND ROSEMARY AVENUE LONDON N3

With reference to the above, We strongly support the views expressed by the Residents Association and we would be most grateful if the area is reinstated and plotted on Map 11 as green area. It is very important for us residents, we have young families and green spaces are vital.

If you are Objecting, what changes are you seeking?:

We would be most grateful if the area is reinstated and plotted on Map 11 as green area.

Council's response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 548 / 1

Name : Mr Simon Appleton

Organisation : Resident / Greensquare

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

Please can you tell me how I can request that the land between Briarfield and Rosemary Avenue (the Greensquare) be reinstated as an open space? I understand that the developers have removed it from Map 11 as part of their plan to develop the site.

If you are Objecting, what changes are you seeking?:

Council's response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 549 / 1

Name : Helen Massey

Organisation : Barnet Residents Association

Policy

Chapter: General comment

Paragraph: AMENDMENT
102

Reason for Objecting or Supporting?:

Thank you for the time you spent with us at FoRAB responding to our queries. A general concern I expressed there about the two documents was the lack of cross referencing, or other adequate signage to developers, between these two core documents and all the other supplementary guidance, which will sit beneath them. Despite Martin's subsequent email BRA is not convinced that developers will readily accept that the more detailed guidance applies to their proposals as well as the aspirational statements of the Core Strategy and DMP.

If you are Objecting, what changes are you seeking?:

Council's response :

SPDs form an important role in the LDF complementing the higher level policies within DPDs. The role of SPDs is to provide more detailed guidance and we consider that the Core Strategy and Development Management Policies provide sufficient cross referencing to these documents ensuring a clear message to residents and developers.

SPDs are subject to public scrutiny and consultation before they are adopted. Developers are able to input through this process.

We will also ensure that Barnet's LDF webpage publicises such documents and provides clear links to all SPDs and DGNs both adopted and draft.

Representation No: 549 / 2

Name : Helen Massey

Organisation : Barnet Residents Association

Policy

Chapter:

Paragraph: AMENDMENT 35

Reason for Objecting or Supporting?:

2.4/nw 2.3.4. Clarification accepted and objection withdrawn.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome the withdrawal of objection

Representation No: 549 / 3

Name : Helen Massey

Organisation : Barnet Residents Association

Policy

Chapter:

Paragraph:

4.11.1

Reason for Objecting or Supporting?:

Our concern over what we see as an inaccurate portrayal of the arts scene in the borough has not been addressed.

If you are Objecting, what changes are you seeking?:

Council's response :

This repeats the Barnet Residents Association representation at Publication Stage 511/3 and we refer to our previous response made on this matter

Representation No: 549 / 4

Name : Helen Massey

Organisation : Barnet Residents Association

Policy

Chapter:

Paragraph:

5.1.10

Reason for Objecting or Supporting?:

Objection withdrawn.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome the withdrawal of objection

Representation No: 549 / 5

Name : Helen Massey

Organisation : Barnet Residents Association

Policy

Chapter:

Paragraph: AMENDMENT 65

Reason for Objecting or Supporting?:

Revised wording now acceptable and objection withdrawn.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome the withdrawal of objection

Representation No: 549 / 6

Name : Helen Massey

Organisation : Barnet Residents Association

Policy

Chapter:

Paragraph: AMENDMENT
102

Reason for Objecting or Supporting?:

7.3.7 (now7.4.2). We will obviously have to wait and see what is forthcoming in the RDG but we are still not convinced from the words in the Core Strategy that any particular care will be taken with areas that have survived better than most. There doesn't appear to be a suitable hook there on which to hang later guidance. It seems sad to lose this opportunity.

If you are Objecting, what changes are you seeking?:

Council's response :

The Core Strategy has set out the parameters of the RDG SPD. We do not consider this a lost opportunity as production of the SPD in 2012 will enable contributions to be made on the detail.

Representation No: 549 / 7

Name : Helen Massey

Organisation : Barnet Residents Association

Policy

Chapter:

Paragraph: AMENDMENTS
96, 118, 119 &
120

Reason for Objecting or Supporting?:

As I mentioned at the meeting the table you have provided in CS3 is a huge improvement in understanding the whole housing trajectory – but the figures for DV still conflict with those in paragraph 7.2.12. I understand that until you have a masterplan and a developer on board all you can put are best estimates; but these could be consistent in the document. Ms Botcherby has responded that she doesn't expect more than 600 – 850 homes to be built.

If you are Objecting, what changes are you seeking?:

Council's response :

We recognise the discrepancy between para 7.2.12 and CS3. Numbers on Dollis Valley will be clarified when a development partner is formally selected in September 2011.

Representation No: 549 / 8

Name : Helen Massey

Organisation : Barnet Residents Association

Policy

Chapter:

Paragraph: 10.1.6

Reason for Objecting or Supporting?:

The crossover/hardstanding issue has still not been properly addressed. We have read DGN 3, which appears to be advisory only on how to construct a hardstanding and maintain planting but it is silent on what happens when it is ignored and gardens are simply concreted over with no green in sight, which is what normally happens. The point we made in our previous submission was that so many people would not be concreting over their front gardens at all if crossovers were not being granted so freely. Many other London Boroughs (for example neighbouring Brent) have a much stronger controls and allow only a fraction of the number of crossovers that we are seeing in Barnet. This is an important issue and we do not think that DGN 3 adequately reflects the statements you make in the Core Strategy and DMP about the value of front gardens both to the streetscape and from an environmental point of view. The guidance has to match the policy, even when the policy is not universally popular.

If you are Objecting, what changes are you seeking?:

Council's response :

This repeats the Barnet Residents Association representation at Publication Stage 511/9 and we refer to our previous response made on this matter

Representation No: 549 / 9

Name : Helen Massey

Organisation : Barnet Residents Association

Policy

Chapter:

Paragraph: 11.2.4

Reason for Objecting or Supporting?:

Revised wordings all acceptable.

If you are Objecting, what changes are you seeking?:

CHECK

Council's response :

We welcome the withdrawal of objection

Representation No: 549 / 10

Name : Helen Massey

Organisation : Barnet Residents Association

Policy Policy CS 6 Promoting Barnet's Town Centres

Chapter:

Paragraph: AMENDMENT
195

Reason for Objecting or Supporting?:

Revised wordings all acceptable.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome the withdrawal of objection

Representation No: 549 / 11

Name : Helen Massey
Policy

Organisation : Barnet Residents Association
Chapter:

Paragraph: AMENDMENT
264

Reason for Objecting or Supporting?:

Revised wordings all acceptable.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome the withdrawal of objection

Representation No: 549 / 12

Name : Helen Massey
Policy

Organisation : Barnet Residents Association
Chapter:

Paragraph: AMENDMENT
248

Reason for Objecting or Supporting?:

Revised wordings all acceptable.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome the withdrawal of objection

Representation No: 550 / 1

Name : Mr Roger Chapman

Organisation : Finchley Community Development Trust

Policy

Chapter:

Paragraph: AMENDMENT 62

Reason for Objecting or Supporting?:

I maintain the objection I made at the publication stage. The amended vision statement remains extremely weak. It is not distinctive enough in terms of its reference to Barnet as a place. The LDF is unsound because the vision that underpins it is too vague to enable identification of the objectives and policies that should be adopted and it lacks any useful spatial analysis.

If you are Objecting, what changes are you seeking?:

The vision should recognise that Barnet is not a 'suburb' but a collection of separate and distinctive 'suburbs' based around historic core towns and villages each with their own character and each requiring a specific policy response. Indeed each should look towards having a neighbourhood plan of its own. The vision as currently constructed does not give sufficient direction in this regard.

Council's response :

The revised vision reflects the Local Strategic Partnership's Sustainable Community Strategy which was published in 2010. The core of the vision is that Barnet is a successful suburb in London. Barnet's heritage and character makes a key contribution to this success. Communities can come forward with Neighbourhood Plans that are in conformity with the Core Strategy. It is not intended that the Core Strategy should identify those areas where Neighbourhood Plans should come forward. We will support and advise those communities that want to produce a Neighbourhood Plan in accordance with the Localism Bill when enacted.

Representation No: 550 / 2

Name : Mr Roger Chapman

Organisation : Finchley Community Development Trust

Policy Policy CS 8 Promoting a strong and prosperous Barnet **Chapter:**

Paragraph:

Reason for Objecting or Supporting?:

The financial crisis of recent years has led to a significant reappraisal of the type of future economy that the country needs. The Growth White paper and the Governments manufacturing framework demonstrate the need to rebalance the economy. The policy in the LDF is based on the old 'financial and services' model which is discredited, unsound, not justified and ineffective.

If you are Objecting, what changes are you seeking?:

The policy and supporting text should be redrafted in the light of recent government announcements and the need to rebalance the economy. This may prove difficult in the timescale of this LDF but the direction of travel should be indicated and signposts to changing policy made which will assist in future policy and decision making.

Council's response :

This repeats the Finchley Community Development Trust's representation at Publication Stage 532/7 and we refer to our previous response made on this matter

Representation No: 550 / 3

Name : Mr Roger Chapman

Organisation : Finchley Community Development Trust

Policy Policy CS 4 Providing quality homes and housing choice in Barnet

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Policy CS4 sets a borough wide target of 30% affordable homes on sites capable of accommodating 10 or more dwellings. This target is not justified by the available evidence, the recent inspectors report into the London Plan EIP, and recent decisions taken by central government to change the housing benefit regime. This will all place additional pressure on outer London boroughs such as Barnet for affordable homes. The policy will not be effective as it will not deliver the increasing number of affordable homes that people need.

If you are Objecting, what changes are you seeking?:

Amend CS4 to read "...seeking a borough wide target of 50% affordable homes on all sites capable of accommodating two or more dwellings."

Council's response :

This repeats the Finchley Community Development Trust's representation at Publication Stage 532/5 and we refer to our previous response made on this matter

Representation No: 550 / 4

Name : Mr Roger Chapman

Organisation : Finchley Community Development Trust

Policy Policy CS 6 Promoting Barnet's Town Centres

Chapter:

Paragraph: AMENDMENT
199

Reason for Objecting or Supporting?:

The policy is unsound because it fails to support and encourage the retention and growth of independent shops. The lack of such a positive policy approach will actively lead to a growth in 'clone town' high streets. This needs to be linked to a greater encouragement towards neighbourhood planning, the promotion of community involvement in town centre decision making and the encouragement of social enterprise in para 11.9.5 and CS6.

If you are Objecting, what changes are you seeking?:

Add a new bullet point to the effect that:

- a. "we will support and encourage the development of town centre neighbourhood plans outside of the priority centres, where independent shops will be encouraged and protected, social enterprise and distinctive and diverse centres promoted."
-

Council's response :

Policy CS6 encourages neighbourhood planning. There has been significant community involvement on the Town Centre Development Frameworks and we will continue with our programme for the priority centres.

Our town centres are changing because of the impact of the recession on the retail sector in particular on national multiples. To respond to these long term consequences both businesses and local communities can work together to produce Neighbourhood Plans or other neighbourhood planning vehicles including planning and development briefs that best suit our smaller town centres.

Representation No: 550 / 5

Name : Mr Roger Chapman

Organisation : Finchley Community Development Trust

Policy

Chapter:

Paragraph:

12.3.7

Reason for Objecting or Supporting?:

12.3.7 states “there are no significant opportunities for new open spaces in North Finchley and East Finchley. The priority in those areas will be to improve access to existing parks.” Stanley Road Playing field in East Finchley has been excluded from the evidence base and is not used in the Open Space report nor the draft Playing Pitch strategy. As this land is owned by Barnet Council and is in an area of open space deficiency this omission is surprising. It is also factually an incorrect statement which the pre-submission amendments have not taken the opportunity to correct.

If you are Objecting, what changes are you seeking?:

Amend para 12.3.7 to state: “there is a significant opportunity to address the open space deficiency in East Finchley by upgrading the Council owned land at Stanley road which has a long history of recreational use spreading back over 100 years. The Council will work with the local community to realise the potential of this site as a legacy project of the 2012 Olympics and include this scheme in its Sites Allocation DPD and neighbourhood plans produced under the forthcoming Localism Act.

Council’s response :

This repeats the Finchley Community Development Trust's representation at Publication Stage 532/3 and we refer to our previous response made on this matter

Representation No: 550 / 6

Name : Mr Roger Chapman

Organisation : Finchley Community Development Trust

Policy Policy CS 9 Providing effective and efficient travel

Chapter:

Paragraph: AMENDMENT
262

Reason for Objecting or Supporting?:

Safety has now been more fully added to this policy which is helpful. However specific proposals, including the introduction of 20mph zones in residential areas throughout the borough to increase safety should be added.

If you are Objecting, what changes are you seeking?:

Redraft Policy CS9 fist bullet point to read: "In order to enable traffic to flow more smoothly we will introduce 20mph schemes on predominantly residential roads, prioritise etc. etc."

Council's response :

The Council does not support the introduction of 20mph zones, which rely on physical measures to restrict the movement of traffic. The types of measures typically implemented can also have adverse impacts on local residents, bus services and emergency services.

While 20mph zones have undoubtedly been successful in many areas where they have been introduced in response to a history of road traffic accidents. The distribution of accidents in Barnet is such that other measures are likely to be a more cost effective means of reducing casualties.

This does not preclude the introduction of 20mph area speed limits if justified in a particular location, but a general policy of introducing these in residential areas is not considered appropriate.

Representation No: 551 / 1

Name : Mr Matthew Knight

Organisation : Resident

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

This land has been used as open space for recreation for over 100 years, and has been successfully defended from many unwelcome and unjustified attempts to build upon it.

Loss of this area as an open space would have a seriously detrimental effect on the neighbourhood, from loss of open space for children to play, loss of trees and wildlife, and in damaging the general wellbeing and environment of local residents.

I believe that designating this space as Open Space would be consistent with the policy of both Barnet Council and the Government in protecting urban green spaces, and as such there is no reasonable case to make for removing it from Map 11.

As such, I should request it is restored to Map 11.

If you are Objecting, what changes are you seeking?:

I am writing to formally request that the land behind Briarfield Avenue and Rosemary Avenue in Finchley N3 (commonly known as the Green Square) is reinstated to Map 11 and designated as an Open Space as part of the LDF Core Strategy.

Council's response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 552 / 1

Name : Mr Alun Evans

Organisation : Metropolitan Police Authority

Policy Policy CS 10 Enabling integrated community facilities and uses

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

The MPA/S requested within their previous representations that policing facilities should be referred to within this section, in order to ensure the emerging Core Strategy reflects Policy 3A.18 of the London Plan.

The MPA/S note the amendment to Policy CS10 to include places of worship under the list of community facilities. Although the MPA/S support this amendment, it is not clear why reference to policing facilities was not also included as part of this amendment.

The MPA/S would like to reiterate the importance of policing facilities being recognised as a community facility. The MPA/S therefore recommend the following further amendment to this policy to ensure this aspect of the emerging Core Strategy is consistent with both the London Plan and Barnet's draft Development Management Policies DPD.

If you are Objecting, what changes are you seeking?:

The MPA/S suggest that the wording to this paragraph be amended to read:

The Council will work with our partners to ensure that community facilities including schools, libraries, leisure centres and pools, places of worship, policing facilities, community meeting places and facilities for younger and older people are provided for Barnet's communities.

Council's response :

This repeats the Metropolitan Police Authority's representation at Publication Stage 510/5 and we refer to our previous response made on this matter

Representation No: 553 / 1

Name : Rose Freeman

Organisation : The Theatres Trust

Policy

Chapter: General comment

Paragraph:

Reason for Objecting or Supporting?:

We have searched the amendments document but our objections regarding policies CS6 and CS10 in the submission document have not been resolved. We note on page 69 of the document listing the UDP Saved Policies that CS10 replaces policies on Arts, Culture and Entertainment (ACE), not to be confused with Arts Council England. However neither CS10 nor CS15 mentions anything about arts facilities – this topic has disappeared, and we refer you to our original representation of November 2010 which presumably hasn't reached you?

If you are Objecting, what changes are you seeking?:

Council's response :

In order to reflect the supporting text we agree as part of Pre-Submission Further Amendments (see Amendment 129) to amend CS10 as follows

.....places of worship, arts and cultural facilities, community meeting place....

Representation No: 555 / 1

Name : Ken & Pat Payne

Organisation :

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

We are emailing you regarding the land behind Briarfield Avenue N3 and Rosemary Avenue N3. Would you please reinstate this area onto the new LDF Framework Plan as an open space and plotted on Map 11 of the LDF Core Strategy. This is a much needed and well used green space in a very congested area.

If you are Objecting, what changes are you seeking?:

Would you please reinstate this area onto the new LDF Framework Plan as an open space and plotted on Map 11 of the LDF Core Strategy.

Council's response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 556 / 1

Name : Dr Julia Hines

Organisation : Green Square Residents Association

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

Introduction

Greensquare Residents Association objects to the removal of Greensquare Field, land bounded by Briarfield Ave, Tangle Tree Close, Rosemary Ave and Dudley Rd, from Map 11. This is green space land which was historically part of the design of the Manor Park Estate (comprising the above roads). Part of this land contains the West Finchley Bowling Club, for the sport of crown green bowls; the rest is an open field and small woodland area, currently accessible from Dudley Road and Tangle Tree Close and via gates at the rear of houses bounding the land.

The relevant amendment is 213, made in response to an objection by Higgins Homes plc (Report no. 502).

If you are Objecting, what changes are you seeking?:

Council's response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 556 / 2

Name : Dr Julia Hines

Organisation : Green Square Residents Association

Policy

Chapter:

Paragraph:

Map 11

Reason for Objecting or Supporting?:

Legal compliance

We reserve the right to claim that the change made to Map 11 was not legally compliant on the grounds of fairness. The piece of land is treated differently to other pieces of land in the same situation. There has been no consistent application of policy in deciding whether or not Greensquare Field should be included in Map 11.

Higgins Homes plc have argued that Greensquare Field should not be included in Map 11 because it is in private ownership and does not have legitimate public access. If this is the policy which Barnet Council wish to follow, they should do so consistently and fairly, and not apply it solely to Greensquare Field.

The following sites are a selection of pieces of land which are included on Map 11 which are privately owned and do not have public access:

Manor House Squash and Tennis Club

Wilf Slack Cricket Ground

Finchley Rugby Club

Finchley Cricket Club

Express Dairy Model Farm (not only privately owned and fenced but with bulls in the field)

In addition Christ College School Playing Fields are included on Map 11. Whilst they are in public ownership there is no public access.

If you are Objecting, what changes are you seeking?:

Council's response :

We recognise that the purpose of Map 11 is not adequately explained and that there is only one reference in the supporting text to Map 11 at para 12.4 with regard to Children's Play Facilities. The relevant supporting sections of text for Map 11 are 12.3 Barnet's parks and 12.4 Children's play facilities. Map 11 should therefore show the distribution of public open space together with play areas and Green Belt and Metropolitan Open Land. It therefore complements Map 10 which shows public open space deficiency. Land at Briarfield Avenue is within an area of public open space deficiency.

Reason for Objecting or Supporting?:

Justification

The amendment is not based on a robust and credible evidence base.

The original Map 11 was drawn up by independent consultants Ove Arup and Partners, on their expert assessment, and following their visit to the land, consultation with planning officers and local residents.

It is recognised that this piece of land is in an area deficient in public open space at local park level by Ove Arup, the Council and two separate Planning Inspectors, who have investigated the use of part of this land at planning appeals, one of which included a public inquiry which lasted 4 days. Their decisions are attached.

We would seek to rely specifically on the following two passages in Dr Andrew Pykett's decision 20 August 2008.

And paragraph 41

"Notwithstanding the ownership of the land, I believe this [proposed development] would amount to significant harm.."

And in the decision of Mr Chris Frost on 3 November 2010 we would rely on paragraphs 8 – 12 and paragraph 21:

Finchley Church End town centre is earmarked as a centre for development which is likely to exacerbate the deficiency in open space in the future.

It should be noted that these planning appeals do not consider West Finchley Bowling Club, which performs an important function in providing recreational facilities particularly for older people, who form an above average section of the borough's community. It also provides an important social focus for its members. Many of whom live alone and benefit from the Sunday lunches cooked by volunteers.

The change is not the most appropriate strategy when considered against the reasonable alternatives. The strategy proposed by Higgins Homes plc would suggest that land in private ownership and/ or land without legitimate public access should not be included in Map 11.

In order to apply Higgins Homes plc's proposed changes consistently the PPG17 audit performed by Ove Arup and Partners would have to be repeated in order to ascertain ownership and access to the land included on Map 11.

This would cause confusion between those pieces of land protected by the policy and Map 11 and the status of other pieces of land protected under the wider definition of PPG17.

Higgins Homes plc make two further points in support of the change they requested.

The first is that this land is not identified on the map of the Characterisation Study as green space, but rather as Type D, suburban terrace. We do not perceive this to be a problem. The suburban character of the area is recognised as distinct to a more densely developed urban area. We do not argue with characterisation of the surrounding streets as suburban; we believe that the land to the rear of these homes is an integral part of their suburban character, and part of the design of the original Manor Park Estate (as it was originally known).

Secondly, Higgins Homes plc make reference to the TVG application. This has now been heard and registration was refused. We would like to make three points in regard to this:

- 1.The West Finchley Bowling Club was not included in this application;
- 2.The evidence of use on the open part of the land was overwhelming and not contested. It includes biannual community parties, children's play, exercise, social activities and fruit-picking. On this part of the land the registration was not accepted because of the historic existence of a lease containing recreational covenants; and
- 3.The registration of the woodland area was not accepted because the Inspector William Webster QC believed that the majority of the usage was on the main path, which he considered was a public right of way and therefore could not be included in a TVG application. It is relevant to note here that the evidence of Higgins Homes plc to the non-statutory public inquiry, through their solicitor Tony Wolton of Edwards Duthie, was that this was a public right of way and that he had informed his clients of this prior to their purchase of the land. Access was blocked for a period of approximately 2 weeks in 2007 but has been used recreationally by local residents and schoolchildren for the past

100 years.

If you are Objecting, what changes are you seeking?:

Council's response :

We have consistently relayed the message that Map 11 does not designate open space.

Our approach to enhancing and protecting Barnet's open spaces is set out in Policy CS 7 which highlights that we will create a greener Barnet by improving access to open spaces particularly in North and East Finchley and other areas of public open space deficiency identified by Map 10.

Representation No: 556 / 4

Name : Dr Julia Hines

Organisation : Green Square Residents Association

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

Effectiveness

We do not believe the proposed changes would be deliverable or able to be monitored, because restricting land on Map 11 to land in public ownership and/ or with legitimate public access would require the Council to monitor the ownership and access of all the potential pieces of land in the borough, amending the plan should the status of any piece of land change in either regard.

Consistent with national policy

The proposed change is not sound because it is not consistent with the Core Strategy, PPG17 or the London Plan.

The proposed change is not in line with Strand 1 of the 3 Strand approach, which is fundamental to this LDF. Specifically, we say that this land is valued open space and so should receive absolute protection from development.

In addition, we believe it is important to protect this land to meet the themes of Sustainable Community Strategy in Barnet, which is aimed at maintaining the quality of life and making the borough an attractive and healthy place to live, particularly for children, young people and old people.

The proposed change is not consistent with PPG17. The Annex to PPG17 defines open space so as to include "all open space of public value". It is clear that this land fits within the typology of paragraph 2 of the Annex, in particular 2(ii),(iv) and (v).

The land also serves the functions described in paragraph 3 of the Annex.

Ownership is irrelevant in PPG17 terms in determining whether land qualifies as open space and whether it is entitled to the protection of national policy.

The land also constitutes open space under the London Plan, and therefore the proposed change is inconsistent with it. Policy 3D.8 sets out the London Plan's policy protection for open space. It specifically identifies the Mayor's intention to "protect, promote and improve access to London's network of open spaces, to realise the current and potential value of open space to communities".

Paragraph 3.298 of the explanatory text defines open space so as to include "green spaces, such as parks, allotments, commons, woodlands, natural habitats, recreation grounds, playing fields, agricultural land, burial grounds, amenity space, children's play areas, including hard surfaced playgrounds and accessible countryside in the urban fringe".

It continues:

"Open spaces play a vital role: they provide a valuable resource and focus for local communities, can have a positive effect on the image and vitality of areas and encourage investment. They provide respite from the built environment or an opportunity for recreation. They promote health, wellbeing and quality of life. They are also vital facilities for developing children's play, exercise and social skills. They play a crucial role in adaptation to and mitigation of climate change, protecting and enhancing biodiversity, reducing flood risk and contributing positively to urban micro-climates."

We would say that Greensquare Field fulfils all these roles.

Paragraph 3.300 states, in so far as it is relevant:

"The Mayor will plan for a range of different types of open space to meet a variety of needs, and work with others to realise the full potential of those spaces that are currently undervalued. Poor quality is not a reason in itself to justify the loss of open space. This includes both spaces that are private and those that are accessible to the public."

We would argue that Greensquare Field would fall to be categorised as a "pocket park" in the Open Space Hierarchy in table 3D.1 of the London Plan.

If you are Objecting, what changes are you seeking?:

Conclusion

We believe that the original version of Map 11 should be reinstated and the version suggested by Higgins Homes plc should be removed.

We believe that strategy suggested by Higgins Homes plc is wrong.

It is not justified, because it does not take into account the independent audit findings of Ove Arup and Partners or the findings of two Planning Inspectors.

It will introduce confusion because the LDF will contain two levels of protection – that granted by Map 11 and that granted through the wider definitions of PPG17 and the London Plan, which do not consider that either ownership or public access are relevant considerations.

It is not effective because it require monitoring of the ownership and access status of land in the borough.

It is not sound because it does not conform to PPG17 or the London Plan and does not take into account Strand 1 of the 3 Strands approach or the Barnet Sustainable Community Strategy.

Applying the criteria of ownership and legitimate accessibility only to Greensquare Field is unfair and would mean that the LDF is not legally compliant.

Council’s response :

We refer to our previous response at 556/3

Representation No: 558 / 1

Name : Mr Ben Overlander

Organisation :

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

The Greensquare Field is a key part of our neighbourhood. It is enjoyed by Finchley residents of all ages in all times of year. I have lived in my property for over 18 months and within that time I have seen a community come together for summer parties, to throw snow-balls and build snow-men and to get together informally. I have played a football game with 8 Pakistan-born students in the Field and shared a drink together afterwards.

I now have two young children and they enjoy spending time in the Greensquare. It makes them feel as though their community reaches far beyond our home and that they have a common thread with their neighbours.

If you are Objecting, what changes are you seeking?:

It is clear that once the map changes, it is simply a matter of time before it is developed into private homes and private gardens. It would be a travesty if this was sacrificed. I urge you to think of the greater good of residents of Finchley and ask that the original version of Map 11 is reinstated.

Council’s response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 559 / 1

Name :

Organisation : Asda Stores Ltd.

Policy

Chapter: General comment

Paragraph:

Reason for Objecting or Supporting?:

These representations are made on behalf of Asda Stores Ltd, owners of the New Barnet Gas Works site, located on the northern edge of the New Barnet District Centre. At 4.9 ha in size, the Gas Works represents one of the largest brownfield sites in the Borough outside the key regeneration areas at Brent Cross and Cricklewood. Redevelopment of the site presents a significant opportunity to bring this vacant and underused site back into beneficial use and to contribute to regeneration of the wider New Barnet area.

Representations were made to the previous consultation on the Preferred Approach document in November 2010 (copy attached) and we have had due regard to the Council's formal response to our comments.

Although the Council adopted a Town Centre Framework for New Barnet in November 2010, which covers the Gas Works site, this document has not been the subject of an independent examination and it is considered that the document has been prepared prematurely, i.e. before a number of the matters such as retail need and town centre boundaries have been established through the Core Strategy and Development Management Policies. Indeed, the Core Strategy Submission Stage document continually states that Town Centre Frameworks will be produced, yet there is no mention of the fact that one of these documents has already been produced. The New Barnet Town Centre Framework should have been produced following the adoption of the Core Strategy and Development Management Policies DPD.

It is therefore considered that little weight should be given to the Town Centre Framework and that it should be reviewed once the Core Strategy and Development Management Policies have been adopted.

These representations should be read in conjunction with our comments on the Barnet Core Strategy Submission Stage document.

If you are Objecting, what changes are you seeking?:

Given the previous use of the Gas Works site and the need to remediate the land before the site can be brought back into active use, redevelopment costs will be very high. As such, it is essential that the Council provides a policy framework that encourages investment in New Barnet and plans for the right type of development on the Gas Works site.

Council's response :

This repeats ASDAs representation at Publication Stage 496/1 and we refer to our previous response made on this matter.

Representation No: 559 / 2

Name :

Organisation : Asda Stores Ltd.

Policy

Chapter: (Relates to numerous policies and paragraphs throughout the entire document)

Paragraph:

Priority Town Centres

Reason for Objecting or Supporting?:

We are extremely concerned that despite our previous representations, New Barnet has not been re-identified as a priority town centre in the Core Strategy Submission Stage document.

We wish to reiterate that New Barnet has long been identified as in need of investment and as a sustainable location for development within the Borough. This is set out in the Council's own evidence base, which has been compiled in support of early stages of the Core Strategy. No clear rationale or new evidence has ever been presented to support the Council's position that New Barnet no longer merits specific designation as a priority town centre. As such, we consider New Barnet should be reinstated to the status of a priority town centre.

We note that the Council state in their document summarising their response to comments received to the Core Strategy Preferred Approach document, that the removal of New Barnet from the list of priority town centres does not prevent such opportunities as the redevelopment of the gas works site being realised in accordance with the adopted Town Centre Framework.

Acknowledging the above, the fact that no justification for New Barnet's removal from the list of priority town centres is provided, means that New Barnet should remain in the list. Indeed, the Submission Stage document makes clear that Town Centre Frameworks will be produced for the priority centres. As a Town Centre Framework has already been produced for New Barnet, it must be regarded as a priority centre.

If you are Objecting, what changes are you seeking?:

It is therefore considered that this part of the Core Strategy Submission Stage document is unjustified and therefore unsound. To ensure this part of the document is sound, reference to New Barnet should be included in every policy and paragraph that refers to the list of priority centres.

Council's response :

This repeats ASDA's representations at Publication Stage 496/2, 496/3 and 496/4 and we refer to our previous responses made on these matters

Representation No: 559 / 3

Name :

Organisation : Asda Stores Ltd.

Policy Policy CS 3 Distribution of growth in meeting housing aspirations

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Policy CS 3 identifies the areas in which the Council will promote housing growth and the quantity of houses to be directed to each area. As previously stated, we support the Council's intention to optimise development densities in accordance with emerging policies in the draft revised London Plan. This approach allows for a case by case consideration of development proposals based on local context and public transport capacity.

However, despite the justification put forward in our previous representations, we note that the Council remain of the view that New Barnet should no longer be included in the list of priority town centres that are to provide the main focus for enhancement and infill housing development and to provide for residential use above ground floor level.

No clear rationale has been presented to demonstrate why New Barnet is no longer considered appropriate for enhancement and housing growth and we strongly object to its exclusion from this category of centres. There is no clear rationale for promoting housing development in the four „priority“ town centres above other district centres within the Borough of Barnet.

The locations identified for housing growth are predominantly in the west and south of the borough. We are concerned that this could lead to a polarisation of future growth whereby investment is concentrated in the southern and western parts of Barnet at the expense of the north and east of the Borough.

For these reasons it is considered that this part of Policy CS3 is unjustified and ineffective, and therefore unsound.

If you are Objecting, what changes are you seeking?:

To ensure this part of the policy is sound, New Barnet should be reinstated as a priority growth centre, and Policy CS3 should be re-worded as follows:

“Through a programme of town centre strategies we will develop frameworks for the town centres of Chipping Barnet, Edgware, Finchley Church End, North Finchley and New Barnet. These locations will provide the main focus for enhancement and infill housing development; and will provide for residential uses above ground floor level”.

Council’s response :

This largely repeats ASDAs representation at Publication Stage 496/6 and we refer to our previous response made on this matter.

We consider the additional proposed amendment by ASDA to Policy CS3 to be NON DULY MADE as it does not relate to a Pre Submission Amendment

Representation No: 559 / 4

Name :

Organisation : Asda Stores Ltd.

Policy Policy CS 4 Providing quality homes and housing choice in Barnet

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

The Council has responded to emerging policy in the draft replacement London Plan by setting a borough-wide target of 30% affordable housing with a mix of 60% social rented and 40% intermediate. We support this approach. We also support the flexibility provided in this policy for the provision of an element of affordable housing in off-site locations or a commuted payment instead of the full provision, particularly given the adverse conditions in the current housing market. It is considered this policy is in line with the London Plan and objectives of PPS3.

If you are Objecting, what changes are you seeking?:

Council's response :

This repeats ASDAs representation at Publication Stage 496/7 and we refer to our previous response made on this matter

Representation No: 559 / 5

Name :

Organisation : Asda Stores Ltd.

Policy Policy CS 6 Promoting Barnet's Town Centres

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Despite our previous comments, Policy CS6 continues to present a grouping of Barnet's town and district centres that we consider confuses the retail hierarchy and appears to have little justification. Paragraph 11.3.5 of the supporting text identifies problems in Brent Street, Burnt Oak, Cricklewood, Colindale - The Hyde, Finchley Church End, Hendon Central District Centres and New Barnet, yet this is not acknowledged in the policy. Instead, the district centres are split into three broad categories as follows:

The „priority” centres where development opportunities will be realised through Town Centre Frameworks - North Finchley, Finchley Church End and Chipping Barnet. This category also includes the Edgware major centre. Those where the Council will take a planned approach to development opportunities - Golders Green, Whetstone and New Barnet; and Those where the Council will, through its Site Allocations DPD promote development opportunities - Burnt Oak, Colindale - the Hyde and Cricklewood.

The Council's formal response does not provide any clear explanation as to why the district centres have been categorised in this way. Given that a Town Centre Framework has already been adopted for New Barnet, it makes no sense at all that New Barnet has been grouped with Golders Green and Whetstone where the Council will take a planned approach to development opportunities. New Barnet should quite clearly be included with the priority centres of North Finchley, Finchley Church End and Chipping Barnet where development opportunities will be realised through Town Centre Frameworks.

For the reasons above, we consider the categorisation of district centres set out in Policy CS6 to be unjustified. As discussed, there is no adequate justification for the removal of New Barnet from the list of priority town centres and its reallocation as a town where the Council will take a planned approach to development opportunities, particularly given that the Council has adopted a Town Centre Framework for the area.

If you are Objecting, what changes are you seeking?:

To ensure this part of the policy is sound, New Barnet should be reallocated as a priority town centre.

We are pleased to see that the Council has included an additional bullet point which confirms that they will seek opportunities for the enhancement of the smaller district centres which were not previously mentioned in Policy CS6.

Council's response :

This repeats ASDAs representation at Publication Stage 496/8 and we refer to our previous response made on this matter

Representation No: 559 / 6

Name :

Organisation : Asda Stores Ltd.

Policy Policy CS 6 Promoting Barnet's Town Centres

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Despite our previous representation which pointed out that the convenience provision identified in Policy CS6 did not reflect the Council's retail study findings, we note that the Council continues to state that they will not "plan further significant convenience goods provision before 2026".

We strongly disagree that there is little quantitative need for further significant convenience retailing in the Borough. As previously pointed out, this assertion is at odds with NNTP's review of Asda's previous planning application, commissioned by the Council, which concluded that there was a need for 2,385 sqm of convenience retail sales floorspace by 2013 on the Gas Works site alone.

We also reminded the Council that their July 2010 Retail Capacity Update identifies „a reasonable level of capacity arising in the North (Chipping Barnet and New Barnet) despite new commitments in Chipping Barnet (Tesco Express and Sainsbury's Local) (paragraph 2.7). The summary concludes:

“We have not taken into account any additional convenience goods provision at New Barnet and as such there is residual global capacity to support 2,218 sqm net additional convenience goods provision over and above existing commitments and pipeline developments and the Council should plan to meet this need in accordance with PPS4 Policy EC5. This capacity represents a global figure that could be met by several small-scale developments across the Borough and does not necessarily suggest capacity for a single large supermarket.”

We also said that it was clear that the Council's analysis focuses solely on quantitative need, whereas PPS4 emphasises qualitative factors and the need to promote choice and competition as key considerations. The 2010 Retail Capacity Update does not include any analysis of qualitative factors, nor does it include any reference to Asda's proposals for new convenience floorspace within New Barnet. This document does not therefore present a complete picture of the existing and emerging retail context across the London Borough of Barnet.

It is clear that the Council has not given proper regard to our comments. Their formal response simply states that their 2009 retail study and the 2010 update provides the most up to date position on quantitative and qualitative on retail need. Indeed, if this is the case, then they must agree that there is a much higher quantitative need for convenience provision in the Borough as a whole, a large proportion of which is identified in the north of the Borough, and appropriate amendments to the policy on quantitative convenience need should have been made.

If you are Objecting, what changes are you seeking?:

For those reasons set out above, we consider that Policy CS6 (in terms of retail need) is unjustified and therefore unsound. To ensure that the policy is sound, reference should be made to the need for further significant convenience growth in the Borough, particularly in the north.

We also wish to make clear that we strongly disagree with the Council's approach set out in the New Barnet Town Centre Framework. Given that matters such as retail need and town centre boundaries are the subject of debate through the Core Strategy and Development Management Policies DPD, we consider the adoption of New Barnet Town Centre Framework which allocates sites for different types of development is premature and is not based on robust evidence. The document should therefore be reviewed following the Inspector's consideration of the Submission documents.

Council's response :

This repeats ASDAs representations at Publication Stage 496/9 and 496/10 and we refer to our previous responses on these matters

Representation No: 560 / 1

Name :

Organisation : The British Library

Policy Policy CS 3 Distribution of growth in meeting housing aspirations

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Colindale is allocated for 8,100 new homes by 2026 in both Policy CS1 and CS3. Whilst, in the adopted Colindale Area Action Plan (CAAP), Colindale is allocated for 10,000 new homes (9,806 of which are already identified on specific sites).

If you are Objecting, what changes are you seeking?:

To explain this the BL welcomes the addition of a footnote to Policy CS3, to clarify that the Core Strategy figure is for development between 2011-2026 , taking into account completions for 2007-2011.

The BL site sits within the Colindale Avenue 'Corridor of Change' as identified in the CAAP. The BL site is in a particularly sustainable location being in such close proximity to the Colindale tube station and the bus services on Colindale Avenue. The site's housing allocation of 345 new homes will help contribute to the delivery of 2,370 new homes between 2007 and 2021 in the Colindale Avenue Area of Change. This will go some way to the delivery of 10,000 new homes in Colindale as a whole over the plan period helping to meet the Core Strategy's spatial vision and objectives for the borough.

Council's response :

This repeats British Library's representation at Publication Stage 500/3 and we refer to our previous response made on this matter

Representation No: 560 / 2

Name :

Organisation : The British Library

Policy Policy CS 4 Providing quality homes and housing choice in Barnet

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Policy CS4 sets out a borough wide affordable housing target of 30% affordable homes on sites capable of accommodating ten or more dwellings. The BL welcomes the revised borough wide target, lowered from the current adopted 50% target. This reflects market conditions and will improve the viability and deliverability of sites, particularly within the borough's regeneration areas.

The CAAP policy 7.2 states: "the Council has a borough wide target of 50% affordable housing, in line with the London Plan. The maximum amount of affordable housing will be sought having regard to this target and to a viability assessment"

The BL has previously made representations to the DM Policies Preferred Approach document requesting that the relationship between Colindale Area Action Plan (CAAP) Policy 7.2 'Affordable Housing' and Core Strategy Policy CS4 'Providing quality homes and housing choice in Barnet' is clarified, as there is inconsistency between the different targets.

A new paragraph 9.6.8 has been added to the Core Strategy which states: "the Area Action Plan for Mill Hill East and Colindale both set out an affordable housing policy which seeks, in line with the adopted London Plan 50% target, to negotiate the maximum reasonable amount of affordable housing subject to viability"

The CAAP is still inconsistent with emerging policy in the Core Strategy and DM Policies. The BL considers that the proposed 30% borough wide affordable housing target should be applied across the borough, including the Colindale AAP, to ensure a consistent approach to development and conformity between policies.

If you are Objecting, what changes are you seeking?:

Therefore the BL considers that CAAP Policy 7.2 should be replaced or formally superseded by Policies CS4 and DM10 once the Core Strategy and Development Policies document are adopted.

A lower affordable housing target will help to ensure that new residential development is viable and deliverable, particularly in the borough's regeneration areas, and will help to meet the borough's housing targets by promoting growth.

Council's response :

This repeats British Library's representation at Publication Stage 500/4 and we refer to our previous response made on this matter.

With regard to the additional comments the relationship of the Core Strategy to the Colindale Area Action Plan is clearly set out at Section 1.3. The AAP provides the planning framework for Colindale and therefore should not be superseded by the Core Strategy.

As a stakeholder the British Library is a member of the Colindale AAP Implementation Group and it is through this group that the British Library should seek to address its concerns about affordable housing in Colindale.

Representation No: 560 / 3

Name :

Organisation : The British Library

Policy Policy CS 5 Protecting and Enhancing Barnet's character to create high quality places

Chapter:

Paragraph: Amendment 177

Reason for Objecting or Supporting?:

The BL welcomes reference to tall buildings being supported closer to the new public transport interchange at Colindale Avenue. This is consistent with the objectives of the CAAP, Policy 5.3, which states that taller buildings (in excess of 6 storeys) will be located in the most sustainable locations which benefit from good access to public transport facilities, shops and services, specifically the area around Colindale Station.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome this support

Representation No: 560 / 4

Name :

Organisation : The British Library

Policy Policy CS 6 Promoting Barnet's Town Centres

Chapter:

Paragraph: AMENDMENTS
181 & 182

Reason for Objecting or Supporting?:

The BL acknowledges that the supporting text to Policy CS6 has been updated at paragraphs 11.4.2 and 11.5.2, to reflect the convenience goods floorspace allocated in the CAAP. The BL welcomes this update in the supporting text which clarifies that the 2.200 sqm of convenience floorspace allocated in CS6 is proposed in addition to existing CAAP allocations.

If you are Objecting, what changes are you seeking?:

The BL requests that this update is also reflected in the wording of Policy CS6 to ensure clarity and consistency in approach.

Council's response :

We welcome this support for the Amendments. We consider that CS6 is clear and there is no need to duplicate the supporting text

Representation No: 560 / 5

Name :

Organisation : The British Library

Policy Policy CS 13 Ensuring the efficient use of natural resources

Chapter:

Paragraph: AMENDMENT
329

Reason for Objecting or Supporting?:

The BL supports the update to paragraph 18.7.2 which identifies areas with the potential for district heating networks including Colindale. This will ensure that the Core Strategy is consistent with CAAP Policy 6.2.

If you are Objecting, what changes are you seeking?:

Council's response :

we welcome this support

Representation No: 560 / 6

Name :

Organisation : The British Library

Policy Policy CS 15 Delivering the Core Strategy

Chapter:

Paragraph: AMENDMENTS
357, 358 & 359

Reason for Objecting or Supporting?:

The BL notes that Section 20.8 Planning Obligations has been updated to include details of a new Barnet Community Infrastructure Levy (CIL).

The BL notes that the council intends to use planning obligations where appropriate alongside other suitable funding mechanisms to support the delivery of infrastructure, facilities and services to meet need generated by development and mitigate the impact of development.

The BL requests to be consulted on both revisions to existing Planning Obligations guidance and new Draft CIL Charging Schedule.

If you are Objecting, what changes are you seeking?:

Council's response :

We will carry out public consultation on the CIL Charging Schedule and the Planning Obligations SPD. The British Library will therefore have an opportunity to contribute to these documents.

Representation No: 562 / 1

Name : Mr Patirck Blake

Organisation : Highways Agency

Policy

Chapter: General comment

Paragraph: AMENDMENT
246

Reason for Objecting or Supporting?:

In our previous response the HA emphasised the importance of a transport evidence base for the LDF in order to identify and mitigate against any shortfalls in public transport provision or highway capacity. Our response suggested that the outputs from the TfL North London Sub Regional Transport Study, or alternative evidence, should be included either within the appendix of the Core Strategy or within an accompanying DPD.

We are therefore very supportive of the boroughwide Transport Assessment to be undertaken (Ref: paragraph 246 14.7.5) and look forward to the results of this assessment. However, without further consultation on the Core Strategy, there will be no opportunity for the results to be reviewed prior to submission.

If you are Objecting, what changes are you seeking?:

We therefore suggest that the results of the Transport Assessment be made available prior to the submission of the Core Strategy DPD. We can then evaluate whether the proposed infrastructure improvements are sufficient to accommodate predicted growth in the borough. In addition we can also assess whether there will be a detrimental impact on the operation of the SRN.

Without this information there is a risk the Core Strategy could fail the test of soundness set out in 4.36 of PPS12, as it appears that the Core Strategy is not founded on a robust and credible evidence base.

Council's response :

We welcome these comments from the Highways Agency and will ensure that they have the opportunity to comment on the LDF Transport Review.

The Transport Review indicates that traffic flows and subsequent delays on the M1 are likely to increase between 2016 and 2031 as a consequence of background growth and large development sites such as the committed Brent Cross development. However, given the expected flow levels, the impact of proposed development on the M1 is unlikely to be material.

We note that the M25 has not been included in the assessment. However, the assessed impacts on the M1 and other roads would indicate that the impact on the M25 is likely to be negligible.

The Highways Agency stated in their e-mail of August 5th 2011 that they consider that Barnet's LDF Transport Review provides sufficient evidence to indicate that the SRN can accommodate proposed growth as set out in Barnet's Core Strategy, alongside Barnet's proposed policies to manage demand.

THE HIGHWAYS AGENCY THEREFORE WITHDRAWS ITS REPRESENTATION

Representation No: 563 / 1

Name :

Organisation : Bestway Holdings Ltd

Policy

Chapter:

Paragraph:

1.4.5

Reason for Objecting or Supporting?:

The adopted UDP and BCC Development Framework are not part of the Council's LDS and will not be part of the LDF when it is adopted (indeed the LDF recognises this point at Para 20.1, where it lists the suit of documents that will provide the framework for decisions on planning applications - this list rightly does not include the adopted UDP and Development Framework). In addition, neither document has been subject to the same level of scrutiny as other LDS documents (e.g. a Sustainability Appraisal, as well as consideration of key tests of being deliverable, flexible and easily able to be monitored). Consequently, it is unsound and unlawful for the LDF to rely on (and cross refer) to the policies/text within the UDP and Development Framework (the Council will also be familiar with Bestway's earlier comments, supported by Counsel's Opinion, which have identified a serious flaw in the UDP in relation to the purported allocation of a waste handling facility as Geron Way).

If you are Objecting, what changes are you seeking?:

The Council should prepare a new set of up to date policies (based on the latest national guidance for preparing LDF documents), which cover the Brent Cross/Cricklewood area. It is these policies which should be used when assessing planning applications in the regeneration area once the LDF has been adopted. As such Core Strategy Paragraph 1.4.5 should be deleted and in its place a new paragraph should be prepared advising that the Council is updating the policies affecting the Brent Cross-Cricklewood regeneration area as part of the Development Management Policies.

Council's response :

This representation does not relate to a Pre Submission Amendment to the Core Strategy

We therefore consider this representation to be NOT DULY MADE

We also note that the objector made no representations to the Core Strategy at the Publication Stage in 2010 when Policy CS 2 was subject to consultation

Representation No: 563 / 2

Name :

Organisation : Bestway Holdings Ltd

Policy

Chapter:

Paragraph:

7.5.2

Reason for Objecting or Supporting?:

The adopted UDP and BCC Development Framework are not part of the Council's LDS and will not be part of the LDF when it is adopted (indeed the LDF recognises this point at Para 20.1, where it lists the suit of documents that will provide the framework for decisions on planning applications - this list rightly does not include the adopted UDP and Development Framework). In addition, neither document has been subject to the same level of scrutiny as other LDS documents (e.g. a Sustainability Appraisal, as well as consideration of key tests of being deliverable, flexible and easily able to be monitored). Consequently, it is unsound and unlawful for the LDF to rely on (and cross refer) to the policies/text within the UDP and Development Framework (the Council will also be familiar with Bestway's earlier comments, supported by Counsel's Opinion, which have identified a serious flaw in the UDP in relation to the purported allocation of a waste handling facility as Geron Way).

If you are Objecting, what changes are you seeking?:

The Council should prepare a new set of up to date policies (based on the latest national guidance for preparing LDF documents), which cover the Brent Cross/Cricklewood area. It is these policies which should be used when assessing planning applications in the regeneration area once the LDF has been adopted. As such Core Strategy Paragraph 7.5.2 should be deleted and in its place a new paragraph should be prepared advising that the Council is updating the policies affecting the Brent Cross-Cricklewood regeneration area as part of the Development Management Policies.

Council's response :

This representation does not relate to a Pre Submission Amendment to the Core Strategy

We therefore consider this representation to be NOT DULY MADE

We also note that the objector made no representations to the Core Strategy at the Publication Stage in 2010 when Policy CS 2 was subject to consultation

Name :

Organisation : Bestway Holdings Ltd

Policy

Chapter:

Paragraph: AMENDMENT
346

Reason for Objecting or Supporting?:

It is inappropriate for the Core Strategy to refer the proposed Geron Way waste facility's ability to create fuel (for the CHP) from recyclable waste as being "subject to feasibility". The developers have previously confirmed that they would provide this element for the scheme in compliance with the adopted UDP and Development Framework policies. Given that the planning permission for the facility has been issued, including the fuel creation element the developers should be required to provide this facility. By giving flexibility to this matter in the Core Strategy , the Council is providing the developer with an opportunity not to comply with adopted development plan policies and to shift away from its previously stated position. This approach is unsound.

If you are Objecting, what changes are you seeking?:

Reference to "subject to feasibility" should be removed from the Core Strategy, as the document is required to be based on factual evidence (the Council has previously been provided with evidence from the developers showing that the creation of refuse derived fuel is feasible).

Council's response :

We have set out a very clear approach to the future of Brent Cross Cricklewood throughout the Core Strategy. There are several references to the delivery of infrastructure being 'subject to feasibility'.

Our Infrastructure Delivery Plan provides a high level risk assessment and cost analysis framework for the delivery of infrastructure including the new waste handling facility. We highlight a suite of monitoring indicators (at Appendix B) for Brent Cross Cricklewood which have regard to the progress made in the implementation and delivery of regeneration. Several of these indicators are Feasibility Studies

Representation No: 563 / 4

Name :
Policy

Organisation : Bestway Holdings Ltd
Chapter:

Paragraph: AMENDMENT
362

Reason for Objecting or Supporting?:

It is inappropriate for the Core Strategy to refer to 'Tax Increment Funding' as this mechanism is yet to be agreed.

If you are Objecting, what changes are you seeking?:

Remove reference to 'Tax Increment Funding' from the Core Strategy.

Council's response :

This section on Other Funding Mechanisms has been revised and specific reference to potential funding has generally been avoided. However tax incremental financing is highlighted as a potential source of funding.

Representation No: 563 / 5

Name :

Organisation : Bestway Holdings Ltd

Policy Policy CS 2 Brent Cross - Cricklewood

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

The adopted UDP and BCC Development Framework are not part of the Council's LDS and will not be part of the LDF when it is adopted (indeed the LDF recognises this point at Para 20.1 where it lists the suite of documents that will provide the framework for decisions on planning applications - this list rightly does not include the adopted UDP and Development Framework). In addition, neither document has been subject to the same level of scrutiny as other LDS documents (e.g. a Sustainability Appraisal, as well as consideration of key tests of being deliverable, flexible and easily able to be monitored). Consequently, it is unsound and unlawful for the LDF to rely on (and cross refer) to the policies/text within the UDP and Development Framework (the Council will also be familiar with Bestway's earlier comments, supported by Counsels Opinion, which have identified a serious flaw in the UDP in relation to the purported allocation of a waste handling facility at Geron Way).

It is also unsound for the Core Strategy to rely on the Council's 'assumption' that the Brent Cross-Cricklewood regeneration scheme will be implemented in accordance with its planning approval. The use of assumption has no place in policy formation (which must rely on a clear and factual evidence base.) In any event, the statement is factually incorrect since even as early as the Officers Report into the Brent Cross-Cricklewood regeneration application, the Council were questioning the scheme viability. This issue of the viability of the approved scheme has more recently manifested itself in recent officers public statements (widely reported in the press) that TIF funding is required for the scheme, to pump-prime later stages of the development.

If you are Objecting, what changes are you seeking?:

The Council should prepare a new set of up to date policies (based on the latest national guidance for preparing LDF documents) which cover the Brent Cross-Cricklewood area. It is these policies which should be used when assessing planning applications in the regeneration area once the LDF has been adopted.

As such Policy CS2 should confirm the Council will be updating the policies affecting the Brent Cross-Cricklewood regeneration area as part of the Development Management Policies.

The policy should also be amended to remove reference to "it is considered likely that comprehensive regeneration will be achieved in accordance with the planning approval", at the Council are already aware that this may not be the case (as suggested in the original Committee report on the application which questioned its viability and reiterated in recent press statements, including in relation to the need for TIF funding).

Council's response :

This representation does not relate to a Pre Submission Amendment to the Core Strategy

We therefore consider this representation to be NOT DULY MADE

We also note that the objector made no representations to the Core Strategy at the Publication Stage in 2010 when Policy CS 2 was subject to consultation

Representation No: 563 / 6

Name :

Organisation : Bestway Holdings Ltd

Policy Policy CS 6 Promoting Barnet's Town Centres

Chapter:

Paragraph: AMENDMENT
201

Reason for Objecting or Supporting?:

The policy needs to refer to the phasing triggers (included in the Brent Cross-Cricklewood hybrid planning permission) which dictate when additional retail floorspace in the regeneration area can come forward.

If you are Objecting, what changes are you seeking?:

Whilst we note that the final bullet point within the policy wishes to see the retail element of the Brent Cross-Cricklewood scheme "contributing to a balanced regeneration of the area", this point does not go far enough and should be more explicit about what the triggers for the development of the retail element are.

Council's response :

Appendix B contains a detailed number of indicators relating to the initiation of the Brent Cross-Cricklewood development. This clearly covers the anticipated progress towards implementation of the permission in phases between now and 2018 and identifies important milestones in making that progress. Policy CS 2 provides an explicit link with the monitoring indicators in Appendix B.

Representation No: 563 / 7

Name :

Organisation : Bestway Holdings Ltd

Policy

Chapter: Chapter 7 - Barnet's place shaping strategy

Paragraph:

Reason for Objecting or Supporting?:

It is inappropriate for the Core Strategy to refer the proposed Geron Way waste facility's ability to create fuel (for the CHP) from recyclable waste as being "subject to feasibility". The developers have previously confirmed that they would provide this element for the scheme in compliance with the adopted UDP and Development Framework policies. Given that the planning permission for the facility has been issued, including the fuel creation element the developers should be required to provide this facility. By giving flexibility to this matter in the Core Strategy, the Council is providing the developer with an opportunity not to comply with adopted development plan policies and to shift away from its previously stated position. This approach is unsound as the Core Strategy should be based on factual evidence rather than future feasibility.

Reference to the Phase 1 of the development (which will include new retail development focussed on Brent Cross shopping centre) providing the initial catalyst and delivering infrastructure that will benefit the wider regeneration being "without public funding", factually incorrect as the Council has announced that it plans to bid for a TIF scheme to reduce the current viability gap with the BCC scheme, thereby enabling the forward-funding of the next phases of the scheme using public money.

The final emboldened statement relating to "Status of Brent Cross - Cricklewood Proposal" is unsound. The Council's LDF policies should set the policies against which the development should be implemented, rather than the currently worded text, which suggests that if the permitted scheme does not proceed then the Core Strategy and LDS may need to be reviewed. In addition, it is unsound to refer to any future planning applications having to be implemented in accordance with a whole suite of documents, including "the saved UDP policies (Chapter 12) and the Development Framework". The adopted UDP and BCC Development Framework are not part of the Council's LDS and will not be part of the LDF when it is adopted (indeed the Core Strategy recognises this point at Para 20.1, where it lists the suite of documents that will provide the framework for decisions on planning applications - this list rightly does not include the adopted UDP and Development Framework). In addition, neither document has been subject to the same level of scrutiny as other LDF documents (e.g. a sustainability appraisal, as well as consideration of key tests of being deliverable, flexible and easily able to be monitored). Consequently, it is unsound and unlawful for the LDF to rely on (and cross refer) to the policies/text within the UDP and Development Framework (the Council will also be familiar with Bestway's earlier comments, supported by Counsels Opinion, which have identified a serious flaw in the UDP in relation to the purported allocation of a waste handling facility at Geron Way).

If you are Objecting, what changes are you seeking?:

Reference to "subject to feasibility" should be removed from the Core Strategy, as the document is required to be based on factual evidence and not future feasibility.

Reference to "without public funding" should be removed from the policy as it is not a factually correct statement.

The Council should prepare a new set of up to date policies (based on the latest national guidance for preparing LDF documents), which cover the Brent Cross - Cricklewood area. It is these policies which should be used when assessing planning applications in the regeneration area once the LDF has been adopted.

The Brent Cross - Cricklewood Regeneration Area text should confirm the Council will be updating the policies affecting the Brent Cross - Cricklewood regeneration area as part of the Development Management Policies.

Council's response :

This representation does not relate to a Pre Submission Amendment to the Core Strategy

We therefore consider this representation to be NOT DULY MADE

We also note that the objector made no representations to the Core Strategy at the Publication Stage in 2010 when Policy CS 2 was subject to consultation

Representation No: 564 / 1

Name : Mr Christopher Pagonis

Organisation : Resident

Policy

Chapter:

Paragraph: AMENDMENT
213

Reason for Objecting or Supporting?:

I do not consider the Core Strategy Amendment legally compliant because it is unfairly treating the green space bounded by the houses on Dudley Rd, Briarfield Avenue, Tangle Tree Close and Rosemary Avenue differently from other privately owned pieces of land, which are shown on Map 11. Furthermore it is not justified, as the original Map 11, on which this green space was shown, was drawn up by independent consultants and the change goes against the findings of two planning appeals which described the land as open green space within the definition of PPG Note 17.

If you are Objecting, what changes are you seeking?:

The change required is to re-instate the green space on Map 11. This will re-introduce consistency and remove the unfairness, bring it in line with the original audit of open space, conform with the findings of the planning appeals thus making it consistent with national policy.

Council's response :

The future of this land has been contentious following recent appeal decisions which dismissed development proposals by Higgins Homes. These decisions are an important consideration for the future of this land. However although an important local issue it is not a strategic issue which affects the soundness of the Core Strategy. The future use of this land is a matter that could be addressed via the Site Allocations DPD but it is necessary that Higgins Homes and local residents work together on providing a way forward for this land.

As previously stated the Boroughwide Map 11 was intended to show the distribution of existing public open space, MOL, Green Belt and Children's Play Areas.

Representation No: 565 / 1

Name :

Organisation : Bride Hall Holdings Ltd

Policy Policy CS 3 Distribution of growth in meeting housing aspirations

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Bride Hall previously requested that the Council consult with them when preparing the framework or Edgware Town Centre in relation to housing provision. Bride Hall generally supports the inclusion of housing as part of mixed use schemes in town centres but considers that it is also important to ensure that the provision of residential uses is compatible with other town centre uses and that it can be accommodated in a manner that will not compromise the amenity of residents. We note that the Council has made a number of small amendments to the policy and these do not affect Bride Hall's position stated above.

If you are Objecting, what changes are you seeking?:

Council's response :

This repeats Bride Halls representation at Publication Stage 499/1 and we refer to our previous response made on this matter

Representation No: 565 / 2

Name :

Organisation : Bride Hall Holdings Ltd

Policy Policy CS 5 Protecting and Enhancing Barnet's character to create high quality places

Chapter:

Paragraph: AMENDMENT
177

Reason for Objecting or Supporting?:

Policy CS5 previously set out a range of principles against which tall building proposals would be considered. It did not specify locations that might be appropriate for tall buildings. Bride Hall responded that the policy should support the inclusion of tall buildings in the Borough around Edgware town centre.

We note that the pre-submission amendments version of the Core Strategy has been amended to specify a range of places which are described as the only locations where tall buildings will be considered. The locations include the Priority Town Centre of Edgware.

Bride Hall strongly supports the wording of the new policy and the Council's recognition that Edgware Town Centre is appropriate for tall buildings.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome this support

Representation No: 565 / 3

Name :

Organisation : Bride Hall Holdings Ltd

Policy Policy CS 6 Promoting Barnet's Town Centres

Chapter:

Paragraph: AMENDMENTS
187, 188, 189 &

195

Reason for Objecting or Supporting?:

In its comments at the Core Strategy Publication Stage Bride Hall supported the inclusion of Edgware town centre in Policy CS6 as a preferred location to accommodate future development for convenience and comparison retail. Bride Hall also supported the policy in so far as it promotes the efficient use of land and buildings in all town centres, encouraging a mix of compatible uses including retail.

Bride Hall noted that the Broadwalk Centre in Edgware is a suitable location to accommodate a variety of town centre uses including additional convenience and comparison goods floorspace, cinemas, hotels and other appropriate uses in accordance with PPS4.

We note that the Pr-submission Amendments version of the Core Strategy has added a reference in the first paragraph of CS6 to PPS4 which states that "development in these town centres will reflect the preferred sequential approach in PPS4 - Planning for Sustainable Economic Growth". Bride Hall supports this addition.

Paragraph 11.7.4 of the explanatory text has been amended to read as follows:

"Town Centre Frameworks aim to create the right environment for vibrant and viable town centres in Barnet. The individual Town Centre Frameworks will identify opportunities to enhance the public realm and improve accessibility for all users and will seek to support the provision of a wide range of shops and services to meet the needs of diverse local populations. All Town Centre Frameworks are subject to community engagement in order to identify the different requirements of each town centre, and the different needs and preferences of those who use them".

Paragraph 11.7.6 of the explanatory text has been amended to read as follows:

"Where opportunity sites are identified in the Frameworks development principles will be set out which will assist in guiding future development proposals for individual sites across the town centre. The Frameworks will provide the basis for managing and promoting positive change in identified town centres and will be a material consideration for planning applications in the area."

Paragraph 11.7.8 of the explanatory text has been added as follows:

"Each Framework will also include a section on Delivery and Implementation which proposes the pooling of Section 106 contributions to invest in a public realm enhancement programme with the potential to top up from other sources including via local traders and community fund raising initiatives."

Bride Hall supports these three sets of changes subject to the caveat that it is consulted on the emerging Edgware Town Centre Strategy at the earliest opportunity. It considers that the Broadwalk Centre should be identified in this document as an opportunity for additional convenience and comparison goods floorspace, cinemas, hotels and other appropriate uses in accordance with PPS4. As a partner to the Council in working to strengthen Edgware Town Centre, Bride Hall would wish to work with the Council on the detailed development principles for the Broadwalk Centre and surrounding area and to be consulted on the proposals for pooling S106 contributions and public realm enhancements, as set out in the Edgware Town Centre Strategy.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome this support and will ensure that Bride Hall as a key stakeholder is involved in the Town Centre Framework for Edgware

Representation No: 565 / 4

Name :

Organisation : Bride Hall Holdings Ltd

Policy Policy CS 9 Providing effective and efficient travel

Chapter:

Paragraph: AMENDMENT
264

Reason for Objecting or Supporting?:

Bride Hall previously supported the approach in policy CS9 to improving public transport and also parking facilities in the borough, but noted that care should be taken to ensure that proposed improvements are appropriate in the context of any future development in the town centre.

We note that the Policy CS9 of the Pre-submission Amendments version of the Core Strategy has been amended to include the need for high quality transport systems in town centres as well as regeneration areas. In addition, we note that the Council is aiming to "promote through Town Centre Frameworks and other planned approaches town centre development opportunities and enhancement programmes to improve the public realm, public transport services and interchange, short-trip making by walking, parking and servicing controls and accessibility improvements."

Bride Hall supports the intention to use Town Centre Frameworks and other planned approaches to promote a coordinated approach to development opportunities and public realm and transport enhancement programmes and would welcome the opportunity to be involved in the preparation of such a strategy for Edgware. Bride Hall hopes this will ensure that proposed improvements to public transport, parking and public realm will be appropriate in the context of any future development of Edgware Town Centre.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome this support and will ensure that Bride Hall as a key stakeholder is involved in the Town Centre Framework for Edgware

Representation No: 566 / 1

Name : Mr Warren Forsyth

Organisation : Middlesex University

Policy

Chapter: General comment

Paragraph:

Reason for Objecting or Supporting?:

The University is very pleased that all of its comments and suggestions (Section 4.6 (paragraph 4.6.3), Section 5 (paragraph 5.1.8), Section 6.2 (Table 2), Section 7.2, Section 13.7 (paragraph 13.7.1), and Policy CS8) have been fairly reported and taken account of in the Council's reports on consultation and in the resultant changes to the wording of the Core Strategy, and the University's aims and aspirations for expansion and consolidation in the Borough have been duly recognised.

The University, therefore, fully supports the Submission Draft of the Core Strategy, as one that is legally compliant, consistent with national policy, justified by evidence and effective as a policy document.

We confirm that we and the University wish to be notified of any further proposed changes to the Core Strategy should they arise.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome this endorsement from our strategic partner - Middlesex University

Representation No: 567 / 1

Name : Mr Glen Rollings

Organisation : Greater London Authority - Planning Decisions Unit

Policy

Chapter: General comment

Paragraph:

Reason for Objecting or Supporting?:

In the previous version of the Core Strategy, the approach to identifying locations for tall buildings was not considered robust. This has now been resolved, and other changes regarding housing, access, transport and waste have been incorporated.

If you are Objecting, what changes are you seeking?:

That the Mayor agrees to submit the comments set out in this report to Barnet Council as the formal response to the pre-submission consultation, and that Barnet Council be advised that the pre-submission documents are in general conformity with the London Plan, subject to minor changes.

Council's response :

We welcome this support from the Mayor of London

Representation No: 567 / 2

Name : Mr Glen Rollings

Organisation : Greater London Authority - Planning Decisions Unit

Policy Policy CS 1 Barnet's Place Shaping Strategy – The Three Strands Approach

Chapter:

Paragraph: AMENDMENT
104

Reason for Objecting or Supporting?:

The disparity between the targets for delivery of new homes in this section, and other mentions of targets in the relevant growth areas (as noted for example, in paragraph 1.31), and the draft replacement London Plan, requires clarification.

If you are Objecting, what changes are you seeking?:

Most growth area figures have been revised downwards leading to a greater gap between these and the borough-level housing delivery targets, meaning that the shortfall figure would need to be derived from other sources, such as estate renewals.

(See Draft Replacement London Plan Table A1.1)

Council's response :

Further Amendments to the Core Strategy clarifies that targets for Brent Cross Cricklewood and Colindale relate to a 15 year time period (2011 -2026) and areas within Barnet, unlike the London Plan

Representation No: 567 / 3

Name : Mr Glen Rollings

Organisation : Greater London Authority - Planning Decisions Unit

Policy

Chapter:

Paragraph: AMENDMENT
238

Reason for Objecting or Supporting?:

Splitting of the Northern Line (Policy CS9; Providing effective and efficient travel) TfL welcomes the proposed change to the supporting subtext which now states "Barnet also welcomes the ongoing improvements to the Northern Line and would not want to see any downgrading of it in the future."

If you are Objecting, what changes are you seeking?:

The word "improvements" has been struck through and should be reinstated.

Council's response :

Further Amendments to the Core Strategy clarify that improvements should not be struck through

Representation No: 567 / 4

Name : Mr Glen Rollings

Organisation : Greater London Authority - Planning Decisions Unit

Policy

Chapter:

Paragraph: AMENDMENT
246

Reason for Objecting or Supporting?:

Transport for London's 'Challenges and Opportunities for North London and the North London Sub Regional Transport Plan': These documents and the expectation as to what they include have not been accurately referenced in the Core Strategy.

If you are Objecting, what changes are you seeking?:

Council's response :

This section has been revised to highlight the Transport Review which has been agreed by TfL. See Amendment 117

Representation No: 567 / 5

Name : Mr Glen Rollings

Organisation : Greater London Authority - Planning Decisions Unit

Policy Policy CS 13 Ensuring the efficient use of natural resources

Chapter:

Paragraph: AMENDMENT
343

Reason for Objecting or Supporting?:

The addition should be moved to the subsequent sentence. In its current location, it would become a significant caveat to all water management measures.

If you are Objecting, what changes are you seeking?:

Council's response :

Further Amendments to the Core Strategy (Amendment 144)

Representation No: 567 / 6

Name : Mr Glen Rollings

Organisation : Greater London Authority - Planning Decisions Unit

Policy

Chapter: Chapter 20 - Delivering the Core Strategy

Paragraph:

Reason for Objecting or Supporting?:

The changes made to the Core Strategy do not reflect those required by Transport for London in respect of prioritising and pooling contributions specifically towards transport improvements. The London Plan clearly states that the 2 key objectives for financial contributions are transport and affordable housing. In addition, developers must have regard to the Mayor's CIL when assessing their transport infrastructure contribution as this as required by replacement London Plan Policy 8.3: Community infrastructure levy. The Mayor's CIL will support the delivery of Crossrail, a major strategic transport improvement. The Barnet CIL should have regard to funding local transport improvements, recognising that some transport infrastructure, for example bus network improvements, are not chargeable through a CIL and will need to be collected through conventional S106 mechanism.

If you are Objecting, what changes are you seeking?:

Council's response :

See Amendment 155 which clarifies the Mayor's CIL role in funding strategic transport improvements and the role of Barnet's CIL in funding local transport improvements.

Representation No: 567 / 7

Name : Mr Glen Rollings

Organisation : Greater London Authority - Planning Decisions Unit

Policy

Chapter:

Paragraph: Evidence Base:
LDF Transport
Review

Reason for Objecting or Supporting?:

Barnet has been working jointly with Transport for London to review the evidence base identified in the Infrastructure Delivery Plan. This work has used a combination of TfL's sub regional transport models and transport assessment and modelling prepared to support approved planning applications. With regard to the schedule of infrastructure required to support the LDF, this must only have regard to committed infrastructure as is identified in the Mayor's Transport Strategy or other schemes with TfL approval. This is considered to be a sound basis for informing the Local Development Framework. TfL will continue to work with the borough to review the effects of growth on local transport capacity. This approach is in general conformity with the draft replacement London Plan.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome this support from the Mayor of London for Barnet's Infrastructure Delivery Plan

Representation No: 568 / 1

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy

Chapter: Chapter 1 - Introduction

Paragraph:

1.4.2

Reason for Objecting or Supporting?:

Section 1.4 describes the relationship between the Core strategy and the Brent Cross Cricklewood Development Framework. Paragraph 1.4.2 refers to the Development Framework being produced to "...guide and inform design and delivery of the development with the aim of achieving high quality comprehensive redevelopment of the area around a new sustainable mixed use town centre spanning the North Circular Road." However, this is not wholly consistent with the Development Framework which clearly sets out, at page 7, the role and function of the document.

If you are Objecting, what changes are you seeking?:

As a result and to avoid inconsistency, this should be replicated in paragraph 1.4.2 as set out below:

"...was produced to guide and inform the physical aspects of development with a view to bringing about a high quality cohesive environment not just a collection of individual buildings".

Council's response :

This repeats Brent Cross Cricklewood Development Partners representation at Publication Stage 534/1 and we refer to our previous response made on this matter

Representation No: 568 / 2

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy

Chapter: Chapter 7 - Barnet's place shaping strategy

Paragraph:

Reason for Objecting or Supporting?:

Pages 34 to 37 contain a text box providing information on BXC. The Development Partners recommend a series of amendments to that text to more appropriately reflect the position of BXC.

If you are Objecting, what changes are you seeking?:

Brent Cross - Cricklewood Regeneration Area

Together with the Mayor of London we have identified Brent Cross - Cricklewood as a major Opportunity Area. Brent Cross - Cricklewood was included as an important strategic project in both the London Plan and the UDP. In December 2005 the Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework was adopted by the council and the Mayor as Supplementary Planning Guidance. The Development Framework was produced in collaboration with the Mayor and the Greater London Authority, landowners and developers in order to guide and inform the physical aspects of development with a view to bringing about a high quality cohesive environment, not just a collection of individual buildings. The UDP policies relating to Brent Cross-Cricklewood were saved by a Direction of the Secretary of State dated May 13 2009.

The London Plan and the UDP saved policies (Chapter 12 including the explanatory text) combined with the Development Framework establishes a series of strategic principles for the comprehensive redevelopment of the area to create a new town centre, the overall vision for which is set out in UDP Policy Gcrick in the following terms:

"The Cricklewood, Brent Cross and West Hendon Regeneration Area as defined on the Proposals Map, will be a major focus for the creation of new jobs and homes, building upon the area's strategic location and its key rail facilities. All new development will be built to the highest standards of design as well as to the highest environmental standards. A new town centre, developed over the Plan period, will be fully integrated into the regeneration scheme."

The Development Framework expands upon this vision and provides guidance within the scope of the saved UDP policies as to what will be acceptable to support regeneration in terms of land uses, design principles and housing densities.

The regeneration area of Brent Cross - Cricklewood is identified on Map 5

A hybrid planning application to establish a masterplan and framework for the comprehensive regeneration of the Brent Cross Cricklewood Area in accordance with relevant development plan policies was submitted by a partnership of key landowners and developers (BXC Development Partners) in March 2008. This followed and resulted in extensive pre and post application consultation with the council, the GLA, Transport for London, the Highways Agency, the Environment Agency and other agencies and stakeholders including the local community. In November 2009 the council resolved to approve the hybrid application subject to completion of a Section 106 Agreement. On 28th October 2010 the Section 106 Agreement was completed and the hybrid planning permission for the BXC development was granted.

These proposals represent the largest and most important development in Barnet and one of London's most important strategic proposals. The development includes the creation of a sustainable new mixed use town centre for Barnet and North London including substantial residential, commercial and retail uses. The proposals include approximately 6,550 housing units, of which, subject to a viability assessment, 2,250 are targeted to be affordable.

The Brent Cross Shopping Centre will be transformed into an outward-facing town centre with approximately double the current amount of floorspace, which will be focused on a new High Street which traverses the North Circular Road. The application proposals comprise a net addition of 55,000m² gross comparison retail floorspace as part of town centre north. South of the North Circular Road will comprise a mix of town centre and residential uses and will include new schools and community uses as well as a new food superstore (to replace the existing food store) and smaller retail units. The 'bridging of the North Circular Road with a new metropolitan scale sustainable town centre will create the heart and focus of activities at the 'hub' of Brent Cross Cricklewood.

In the later phases of the development a new office quarter is proposed to the north west of the area (south east of the existing Staples Corner) which will be served by a new railway station in the later phases of the development.

A new 'state of the art' bus station is proposed at the Brent Cross Shopping Centre, linked to the realignment and enhancements of the River Brent Corridor.

The development will deliver new:

- open spaces and squares and improvements to Clitterhouse Playing Field
- Claremont Primary school will be rebuilt and expanded as an environmentally 'exemplar' education and learning building in the first phase and both Whitefield and Mapledown School will be reprovided in new premises in later phases
- a new Primary Care Centre for NHS Barnet
- a small library and a replacement Leisure centre are proposed in Phase 2
- a new Rail Freight Facility is proposed in a later phase
- extensive improvements to the road network will be undertaken to accommodate significant new movement in this development
- contributions toward accessibility improvements to Brent Cross Underground and Cricklewood Stations are proposed
- significant improvements to bus services in North West London including a contribution to a new Rapid Transit Service between Cricklewood Station, Brent Cross Station and the new town centre shopping areas, with potential extension to other nearby tube stations such as Hendon Central.
- improvements will be made to pedestrian and cycle links

Brent Cross Cricklewood is expected to be delivered over a twenty year timescale according to a detailed delivery programme which will be approved by the Council. Implementation of each phase of the development will depend on economic viability. As the phases proceed further infrastructure and other improvements to the area will be delivered. The precise timing of commencement and delivery of the development will depend upon the developers securing the various approvals required pre-commencement of Phase 1, including a compulsory purchase order so as to underpin site acquisition. The planning conditions require that Phase 1 should commence no later than seven years from the grant of permission. We will monitor progress in these procedures by reference to the monitoring indicators in Appendix B as part of the Annual Monitoring Report in the early pre-commencement years of the project, as well as the relevant outputs from the development once construction has commenced. Phase 1 will include around 50% of the proposed new retail development focused on Brent Cross Shopping Centre which will provide the initial catalyst to deliver (without public funding) infrastructure that will benefit the wider regeneration of the whole area. A new hotel and cinema will be built on the north side of the North Circular Road. The Whitefield Estate will be demolished and the affordable housing units will be replaced elsewhere within the site. Around 1,300 housing units will be started in Phase 1. The Waste Handling Facility and SHP/CCHP will form part of Phase 1 and these will generally serve the needs of the whole development insofar as it is feasible. Phase 1 will also include an new Tempelhof Bridge and improved access between A406 and Brent Cross Shopping Centre including major improvement of A41/A406.

Phase 2 will comprise the remainder of the new town centre shopping area north of the North Circular Road and elements adjacent to the Phase 1 areas to the south. This will include the replacements for the Whitefield Secondary School and Mapledown Special Needs School, completion of the improvements to Clitterhouse Playing Fields, a replacement for Hendon Leisure Centre and a new Health Centre, Brent Cross Bus Station, step-free access at Brent Cross Underground and Cricklewood Stations, M1/A406 junction improvements and development around Cricklewood Lane. The completion of Phase 2 represents completion of the new town centre core.

Phase 3 comprises predominantly residential development completing the Eastern Lands development zone, including a private hospital, residential development to the west of Brent Cross Shopping Centre on the north side of the A406, completion of River Brent works and completion of the A406 pedestrian bridge.

Phase 4 comprises a new rail freight facility, residential development to the south of Brent Terrace, Gas Governor Square and Millennium Green Park.

Phase 5 comprises the new road link across the Midland Mainline, residential development and local retail facilities along the length of Brent Terrace, new Thameslink Rail Station close to Staples Corner and Brent Terrace Park.

Phase 6 comprises high rise business accommodation known as the Station Quarter, retail and hotel development adjacent to the new rail station including Northern Nature Park and new Tower Square

Phase 7 comprises business and retail development on the site of the existing Brent South Shopping Park.

The above phasing is consistent with the Indicative Phasing Parameter plan approved as part of the BXC planning permission. Condition 4.2 of the planning permission permits variations to this phasing, subject to satisfactorily addressing a number of tests. The exact composition of each phase may change to that summarised above.

Status of Brent Cross Cricklewood Proposal

In the event that the development envisaged does not proceed, the Core Strategy and the Local Development Scheme may need to be reviewed and in the meantime it is intended that any future planning applications will be determined in accordance with relevant policies of the Core Strategy and other LDF documents, as well as the London Plan, the saved UDP policies (Chapter 12 including the explanatory text) and the Development Framework, subject to any future reviews of these documents."

Council's response :

This repeats Brent Cross Cricklewood Development Partners representation at Publication Stage 534/5 and we refer to our previous responses and Amendments 81, 85 and 86 in relation to this matter.

Representation No: 568 / 3

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy Policy CS 1 Barnet's Place Shaping Strategy – The Three Strands Approach

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Policy CS1 describes Barnet's spatial strategy for development which includes focusing development in appropriate strategic locations such as BXC. The policy correctly seeks to achieve a high quality of urban design however, it goes further to require development proposals to be of the "highest standards" and "landmark quality". We continue to be concerned that there is no definition of what the highest or landmark quality may involve and there is a danger that the policy could set an unrealistically high test which is difficult to meet with an economically viable scheme.

The terms highest standard and landmark quality are not consistent with national policy relating to design. PPS1 (Delivering Sustainable Development) sets out the Government's general approach. Paragraph 35 recognises the importance of high quality design but does not impose a requirement for the highest or landmark quality. It states:

"High quality and inclusive design should be the aim of all those involved in the development process. High quality and inclusive design should create well mixed and integrated developments which avoid segregation and have well planned public spaces that bring people together and provide opportunities for physical activity and recreation. It means ensuring a place will function well and add to the overall character and quality of the area, not just for the short term but over the lifetime of the development. This requires carefully planned, high quality buildings and spaces that support the efficient use of resources...[our emphasis]

If you are Objecting, what changes are you seeking?:

Accordingly, to avoid the imposition of an undefined and potentially unattainable policy test, we strongly recommend that the term "highest quality" design is replaced by "high quality" design and that "landmark quality" is deleted.

Council's response :

This repeats Brent Cross Cricklewood Development Partners representation at Publication Stage 534/6 and we refer to our previous response made on this matter

Representation No: 568 / 4

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy Policy CS 2 Brent Cross - Cricklewood

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

It is noted that the Council has (despite the Development Partners' previous suggestions) retained the text which might be argued to tie the policy to "the planning permission described in the information box on Brent Cross - Cricklewood" (i.e. the existing permission granted in October 2010). We understand following discussion with Council officers that reference to "the planning permission" was intended to be flexible, however it does have that effect, and is inconsistent with other aspects of the policy and the BXC text box which recognises that future planning applications may be submitted. This constitutes a fundamental concern of the Development Partners in their representations.

If you are Objecting, what changes are you seeking?:

We suggest below alternative amendments to overcome the Development Partners concern with appropriate flexibility reflected in the policy and supporting text.

Other updates of a minor nature are also proposed to the policy below to ensure consistency with the anticipated delivery of BXC:

"Brent Cross - Cricklewood is identified as an opportunity area in the London Plan and on Map 5. It will be a major focus for the creation of new jobs and homes, building upon the area's strategic location and its key rail facilities.

We will seek comprehensive redevelopment of Brent Cross - Cricklewood in accordance with the London Plan, the saved UDP policies (Chapter 12 including supporting text) and the adopted Development Framework. This will provide the key elements of the local planning policy framework for deciding future planning applications unless and until replaced by new DPD or SPD as a result of the LDF Monitoring and review process. It is considered likely that comprehensive regeneration will be substantially achieved in accordance with the principles in the planning permission granted to the BXC Development Partners (or an alternative permission). If this proves unlikely then we will consider whether in the circumstances the LDF needs to be reviewed.

Specific monitoring indicators for Brent Cross - Cricklewood are set out in Appendix B and we will have regard to them in monitoring the progress made in the implementation and delivery of regeneration, including the achievement of important milestones (as set out in Appendix B) towards the initiation of development the planning permission (or an alternative permission) described in the information box on Brent Cross - Cricklewood.

It is anticipated that the BXC Development Partners are committed to progressing the project as quickly as reasonably practicable towards commencement of the development the planning permission (or an alternative permission) subject to securing the necessary planning approvals, highways orders and site assembly. On the basis of these indicators we expect that comprehensive re-development will commence in relation to Phase 1 at some time between 2015 and 2017.

If in light of progress made in securing pre-commencement approvals and other related procedures as well as actual delivery of the development, these milestones are not achieved (or are not likely to be capable of being delivered) we will consider the possible need for a review of the Core Strategy policy on Brent Cross - Cricklewood in the light of progress that is being made in delivering this important strategic project."

Council's response :

This repeats Brent Cross Cricklewood Development Partners representation at Publication Stage 534/7 and we refer to our previous response made on this matter.

We note that a number of additional amendments have been requested in particular references to 'an alternative' permission. These requests do not relate to the Pre-Submission Amendments and are therefore NOT DULY MADE

Representation No: 568 / 5

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy

Chapter: Chapter 11 - Vibrant suburban town centres

Paragraph:

Reason for Objecting or Supporting?:

Section 11.12 deals with cinemas and suggests that with the exception of a cinema as part of the BXC scheme, the provision is considered adequate to meet current demand. However, this does not correctly reflect the conclusions of the Town Centre Floorspace Needs Assessment (April 2009), specifically paragraph 8.12 which based on the fact that the cinema assessment was undertaken back in 2006, suggests there may be sufficient cinema provision in the borough "until the market demand dictates otherwise").

If you are Objecting, what changes are you seeking?:

As a result paragraph 11.2.1 should be amended to accord with the appropriate evidence base document:
"A cinema is proposed as part of the Brent Cross - Cricklewood proposal. Apart from this proposal cinema provision is considered adequate to meet current demand, unless the market dictates otherwise".

Council's response :

We agree to make this change as part of the Further Pre Submission Amendments See Amendment 83

Representation No: 568 / 6

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy

Chapter: Chapter 13 - Promoting a strong and prosperous Barnet

Paragraph:

Reason for Objecting or Supporting?:

Paragraph 13.3.2 refers to the relocation of the waste and rail freight facility, together with business, industrial, warehouse and distribution uses, on land bordered by the A5. As explained in the previous representations, the Development Partners are not clear what business, industrial, warehouse and distribution uses, beyond the rail and freight facilities, are to be relocated onto land adjacent to the A5.

If you are Objecting, what changes are you seeking?:

As such it is recommended that this element of the paragraph be deleted as shown below:

"Proposals for Brent Cross - Cricklewood will involve the displacement of existing industrial uses and distribution and warehouse uses. This includes the Claremont Way Industrial Estate. We will work with developers to ensure that such uses receive assistance in relocating. Provision for relocation of the waste transfer facility and rail freight facility will be made on the land bordered by the A5 and Midland Main Line railway (as identified in the Brent Cross - Cricklewood Development Framework)."

Council's response :

This repeats Brent Cross Cricklewood Development Partners representation at Publication Stage 534/12 and we refer to our previous response made on this matter

Representation No: 568 / 7

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy

Chapter:

Paragraph: Infrastructure
Delivery

Reason for Objecting or Supporting?:

In respect of the IDP we would again like to make the following comments:

- the IDP includes "Phase" and "Period" columns. It seems rather unnecessary to include both of these columns, and in this instance "Period" seems to us to be more appropriate; and
 - "Brent Cross Underground Station (interchange and station improvements)" appears to be a duplicate of "Brent Cross Underground Station (interchange)", and thus should be deleted.
-

If you are Objecting, what changes are you seeking?:

Council's response :

This repeats Brent Cross Cricklewood Development Partners representation at Publication Stage 534/15 and we refer to our previous response made on this matter

Representation No: 568 / 8

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy

Chapter: Appendix B - Core Strategy Monitoring Indicators

Paragraph: Monitoring Indicators

Reason for Objecting or Supporting?:

Appendix B identifies a series of monitoring indicators which will review progress made in the implementation and delivery of regeneration at BXC.

If you are Objecting, what changes are you seeking?:

The Development Partners have reviewed these indicators against the implementation timescales set out and would request the following changes:

- 2010-2012
 - item 'BXC Public Consultation Strategy approved (Condition 1.23) and planning and development forums established (if appropriate)' should be moved to 2013-2014;
 - Item 'Existing Open Space Site Measurement approved (Condition 2.3)' should be moved to 2013-2014;
 - Item 'Construction Consolidation Centre Feasibility Report carried out and approved (Condition 1.9)' Should be moved to 2013-2014;
 - Item 'Framework Servicing and Delivery Strategy (Condition 1.21) and planning and development forums established (if appropriate)' should be moved to 2013-2014;
 - Item 'BXC Public Consultation Strategy approved (Condition 1.23) and planning and development forums established (if appropriate)' should be moved to 2013-2014;
 - Item 'Area Wide Walking and Cycling Study (Condition 1.20)' should be moved to 2013-2014;
 - Item 'RDF Feasibility Study submitted and approved (Condition 35.3)' should be moved to 2013 - 2014;
 - Item 'Vacuum Waste Collection System Feasibility Study approved (Condition 1.24) should be moved to 2013-2014.
 - item 'Construction Access approved in relation to the CHP/CCHP and WHF (condition 8.4)' should be moved 2013-2014;
 - Item 'BXC Mobility Feasibility Study and Strategy (condition 1.25)' should be moved to 2013 - 2014;
 - Item 'Work commenced in relation to detailed design of the Site Engineering and Preparation Works (Condition 1.8)' is duplicated in 2013-2014 and should be deleted.
-

Council's response :

This repeats Brent Cross Cricklewood Development Partners representation at Publication Stage 534/16 and we refer to our previous response made on this matter

Representation No: 568 / 9

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy

Chapter: Appendix B - Core Strategy Monitoring Indicators

Paragraph: Monitoring Indicators

Reason for Objecting or Supporting?:

If you are Objecting, what changes are you seeking?:

The Development Partners would also suggest that the introduction to the Monitoring Indicators is updated as follows:

"This section sets out the key monitoring indicators which we will use to monitor proactively progress being made towards initiation of the Brent Cross - Cricklewood regeneration project which is described in the information box contained in section 7 of the Core Strategy and referred to in Policy CS2. This is an important strategic policy and if the anticipated progress towards implementation of the planning permission (or any associated permission) is not achieved, we will consider whether there is a need to review the Core Strategy and/or to consider alternative policy initiatives to fulfil the community's needs. We will not apply the milestones set out in this section rigidly. They will be used in a flexible and sensible manner as applicable to such permission to gauge progress towards implementation of this important regeneration project and to assess the risk that the benefits and outputs from it (as anticipated in the core strategy) may be delayed or lost. If such a risk is found to exist in the course of monitoring and review, will carefully consider measures that may be needed to address it, including the possibility of a review of the core strategy.

Council's response :

This section was not subject to Pre Submission Amendment therefore this objection is NOT DULY MADE

Representation No: 568 / 10

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy

Chapter:

Paragraph: AMENDMENT 5

Reason for Objecting or Supporting?:

In relation to national planning policy, paragraph 1.1.4 makes reference to the Government's emerging planning policy context and in particular the introduction of the Localism Bill. However, the document does not refer to the forthcoming National Planning Policy Framework (NPPF).

Although the Draft NPPF is to yet be published for consultation (scheduled for July 2011) we would like to draw the Council's attention to the fact that the Proposed Draft from the Practitioners Advisory Group was published in May 2011. It is understood that the Government will give this document careful consideration in drafting the NPPF. As this represents a new issue since the previous representations were submitted on behalf of the Development Partners, it is appropriate that we make representations now. The NPPF will have significant implications for the Core Strategy and therefore it would be pertinent that the document makes reference to this emerging framework, particularly as the Government's draft NPPF is likely to be published shortly and potentially adopted before the Council's Core Strategy.

If you are Objecting, what changes are you seeking?:

Council's response :

We await further clarification from the Government on the draft NPPF published in July 2011 and its implications for Barnet's Core Strategy.

At this stage we do not have that clarity and therefore do not propose to make reference to it.

We will be guided by the Inspector at the EIP on any amendments to the Core Strategy with regard to the NPPF.

Representation No: 568 / 11

Name : Mr Philip Murphy

Organisation : Brent Cross Cricklewood Development Partners

Policy

Chapter: Chapter 1 - Introduction

Paragraph:

1.4.5

Reason for Objecting or Supporting?:

If you are Objecting, what changes are you seeking?:

Paragraph 1.4.5 describes the Council's intent to continue to use the saved policies from Chapter 12 of the UDP, however, it has omitted to make reference to the Development Framework, and thus we recommend the following amendments are made:

"...redevelopment of Brent Cross Cricklewood these 'saved' policies (including the accompanying explanatory text) and the Development Framework will continue to operate until..."

Council's response :

This repeats Brent Cross Cricklewood Development Partners representation at Publication Stage 534/3 and we refer to our previous response made on this matter

Representation No: 569 / 1

Name :

Organisation : Comer Group

Policy

Chapter:

Paragraph:

Table 3

Reason for Objecting or Supporting?:

Appendix A, Table 3 identifies Barnet's Development Pipeline. A number of these numerical housing targets are subject to amendments, however the figure of 400 units in relation to the North London Business Park is intended to remain unchanged. The figure of 400 significantly under-estimates the capacity of a site capable of delivering significant residential accommodation as part of a comprehensive mixed-use scheme. This is unsound as the figure is not properly justified, nor presents the most appropriate approach, and is based upon an old Planning Brief. Planning Officers at Barnet have indicated that this Planning Brief is no longer in circulation. We would not recommend it was given such weight throughout the LDF in light of emerging policy in the London Plan and other Barnet DPD's.

The figure of 400 net additional dwellings significantly under-estimates the capacity of the NLBP site. We support the retention of employment space and the introduction of residential accommodation at the NLBP, but recommend a far higher contribution of net additional units can be achieved following the re-allocation of this employment space throughout the site.

The emerging LB Barnet Core Strategy indicates that density will be calculated in accordance with the London Plan matrix. The London Plan (2008 and 2009) density matrix indicates a maximum of 75 units per hectare on a site such as the North London Business Park; as it falls within a Public Transport Accessibility Level zone of 0 – 1 and is within a 'Suburban' location. Although the overall site size is 16.5ha, approximately 3-3.5ha is existing employment space, the quantum of which will be retained in some form as part of any redevelopment. This leaves approximately 13ha of developable land, which at a density of 75dph could achieve 975 new units. This figure is significantly higher than the figure of 400 currently identified within the Core Strategy.

As this is the maximum density scenario, the density can be recalculated at a lower level to ensure any future development is in keeping with the surrounding area and maintains a high quality design with sufficient open space and parking provision. Potential redevelopment schemes for the site have been generated by a leading architect, who recommends that by retaining the existing level of employment space, incorporating open space and sufficient parking the site could accommodate 683 residential units (avg. 53dph). A more sensitive approach which would vary density according to 'character' areas across the site could achieve 586 units. These figures indicate that significantly more than 400 units can be achieved on site.

The figure as identified within Table 3 informs policy throughout the Core Strategy . If the figure remains this low it is likely to significantly undervalue the potential of the NLBP and restrict future redevelopment. This could put further pressure on other, potentially less developable, sites to reach the Borough-wide housing target as set by the London Plan. The NLBP provides an excellent opportunity for a comprehensive redevelopment that would optimise a currently under-performing site.

If you are Objecting, what changes are you seeking?:

We feel Table 3 should be amended to indicate the actual capacity of the NLBP and justified by a contemporary, design-led masterplan that presents a realistic redevelopment option for the site as opposed to the current source which amounts to an out dated Planning Brief. Any other numerical references to the NLBP throughout the Core Strategy that are not identified within the Pre-Submission Amendments document should also be amended

Council's response :

Table 3 has not been amended with regard to the NLBP site.

We note that Comer Homes did not make representations at the Core Strategy Publication Stage in 2011.

The figures for NLBP have not been amended at Pre Submission Stage. Therefore this objection is NOT DULY MADE

Representation No: 569 / 2

Name :

Organisation : Comer Group

Policy Policy CS 3 Distribution of growth in meeting housing aspirations

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Policy CS3 is being updated in order to adapt housing delivery figures in regeneration and development areas. A number of these numerical housing targets are subject to amendments, however the figure of 400 units in relation to the North London Business Park is intended to remain unchanged. The figure of 400 significantly under-estimates the capacity of a site capable of delivering significant residential accommodation as part of a comprehensive mixed-use scheme. This is unsound as the figure is not properly justified, nor presents the most appropriate approach, and is based upon an old Planning Brief. Planning Officers at Barnet have indicated that this Planning Brief is no longer in circulation. We would not recommend it was given such weight throughout the LDF in light of emerging policy in the London Plan and other Barnet DPD's.

The figure of 400 net additional dwellings significantly under-estimates the capacity of the NLBP site. We support the retention of employment space and the introduction of residential accommodation at the NLBP, but recommend a far higher contribution of net additional units can be achieved following the re-allocation of this employment space throughout the site.

The emerging LB Barnet Core Strategy indicates that density will be calculated in accordance with the London Plan matrix. The London Plan (2008 and 2009) density matrix indicates a maximum of 75 units per hectare on a site such as the North London Business Park; as it falls within a Public Transport Accessibility Level zone of 0 – 1 and is within a 'Suburban' location. Although the overall site size is 16.5ha, approximately 3-3.5ha is existing employment space, the quantum of which will be retained in some form as part of any redevelopment. This leaves approximately 13ha of developable land, which at a density of 75dph could achieve 975 new units. This figure is significantly higher than the figure of 400 currently identified within the Core Strategy.

As this is the maximum density scenario, the density can be recalculated at a lower level to ensure any future development is in keeping with the surrounding area and maintains a high quality design with sufficient open space and parking provision. Potential redevelopment schemes for the site have been generated by a leading architect, who recommends that by retaining the existing level of employment space, incorporating open space and sufficient parking the site could accommodate 683 residential units (avg. 53dph). A more sensitive approach which would vary density according to 'character' areas across the site could achieve 586 units. These figures indicate that significantly more than 400 units can be achieved on site.

The figure as identified within Table 3 informs policy throughout the Core Strategy. If the figure remains this low, Policy CS3 is likely to significantly undervalue the potential of the NLBP and restrict future redevelopment. This could put further pressure on other, potentially less developable, sites to reach the Borough-wide housing target as set by the London Plan. The NLBP provides an excellent opportunity for a comprehensive redevelopment that would optimise a currently under-performing site

If you are Objecting, what changes are you seeking?:

We feel CS3 should be amended to indicate the actual capacity of the NLBP and justified by a contemporary, design-led masterplan that presents a realistic redevelopment option for the site as opposed to the current source which amounts to an out dated Planning Brief. Any other numerical references to the NLBP throughout the Core Strategy that are not identified within the Pre-Submission Amendments document should also be amended.

Council's response :

CS3 has not been amended with regard to the NLBP site. The Policy has been amended to ensure consistency with Table 3

We note that Comer Homes did not make representations at the Core Strategy Publication Stage in 2011.

The figures for NLBP have not been amended at Pre Submission Stage. Therefore this objection is NOT DULY MADE

Name :

Organisation : Comer Group

Policy

Chapter:

Paragraph: AMENDMENT
126

Reason for Objecting or Supporting?:

The proposed changes to reflect the updated SHMA do not reflect the full extent of the findings. The North London SHMA December 2010 identifies it is not solely the supply of larger homes that the Borough requires, but the affordability of them.

Further to this, Barnet actually contains a lower proportion of one, two and three bedroom dwellings compared to the sub-region as a whole, and a much higher proportion of properties with 4 or more rooms. The SHMA estimates that the most significant demand, based upon recent household flows and the adjusted Housing Needs Index, will be for 2 bedroom market and 1 bedroom social housing (para. 108).

If you are Objecting, what changes are you seeking?:

Whilst there is demand for Barnet's priority housing, the SHMA also identifies a continuing need for smaller properties and variation in demand between sectors. We would recommend including wording to the effect of acknowledging the Council's housing priorities whilst incorporating flexibility to support the delivery of a mix of housing sizes to meet overall demand.

Council's response :

This Pre Submission Amendment reflects our ongoing assessment of housebuilding in Barnet - 'are we building the right homes for the next generation?'. The section is about housing supply in Barnet and it is not sourced from the SHMA

Representation No: 569 / 4

Name : **Organisation :** Comer Group

Policy Policy CS 8 Promoting a strong and prosperous Barnet **Chapter:**

Paragraph: AMENDMENT
224

Reason for Objecting or Supporting?:

Policy DM14 and the supporting text is significantly flawed, therefore we feel the amendment that references this policy should only be included when it has been considerably improved.

Policy DM14 and the supporting text identify and protect employment space at sites identified as "...Locally Significant Industrial Sites, (suitable for Class B2 and B8 uses)..." This definition is incorrect in respect of the North London Business Park site, whereby the uses fall within Class B1. Further to this there is no flexibility in the policy for the re-assessment or release of designated land, which conflicts with advice within the London Plan and PPS4 which recommend that Borough's should identify, designate and then manage the release of industrial land for other uses.

Such a restrictive, and in part inaccurate, approach to the available land at the NLBP has the potential to "unnecessarily inhibit other strategic and local planning objectives, especially those to provide more housing (including affordable housing) and, in appropriate locations, to provide social infrastructure." (The Mayor's Industrial Capacity SPG as within the Draft Replacement London Plan Examination in Public report)

If you are Objecting, what changes are you seeking?:

The Core Strategy should not promote an unsound policy as it has the ability to restrict the delivery of residential accommodation and high quality employment space as part of comprehensive redevelopment scheme of the NLBP that would bring significant environmental, social and economic benefits to the Borough.

Council's response :

This is an objection to DM14 - New and Existing Employment Space.

It is appropriate that the Core Strategy should provide cross-references to the Development Management Policies DPD.

Representation No: 570 / 1

Name : Mr Robert Newton

Organisation : Resident

Policy Policy CS 5 Protecting and Enhancing Barnet's character to create high quality places

Chapter:

Paragraph:

10.6.7

Reason for Objecting or Supporting?:

The Town Centres of Edgware, Finchley Church End and North Finchley should not be included in Policy CS5 as locations suitable for tall buildings.

The decision to include these three Town Centre locations is based on a selective interpretation of the Tall Buildings Study of the London Borough of Barnet (Final report – November 2010) and not justified.

Whilst the Greater London Authority in their response to the Core Strategy Publication Stage consultation correctly advised that appropriate locations for tall buildings should be identified in the Core Strategy, what they are reported to have said is:

"The GLA supports the identification of a definition of tall buildings in the Barnet context of eight storeys or more and the use of criteria to assess impacts of applications. There is concern over how locations for tall buildings have been identified. The Tall Building Study identifies 21 existing clusters of tall buildings. However, the policy itself does not actually identify any specific locations, it only sets out criteria for the assessment of site-by-site applications. The only indication of where tall buildings may be appropriate is a reference in the Tall Building Study that "Tall buildings which lie within these existing tall buildings groupings are likely to be more appropriate than those which fall outside them. However, there is an inconsistency with this in that in the many other London suburbs these towers are generally not well regarded and in many cases are the subject of comprehensive renewal programmes."

Therefore the only indication of potentially appropriate locations is the existing clusters, however, these are recognised as not being particularly successful. This is not considered a robust approach".

In particular, the existing tall buildings located in Edgware, Finchley Church End and North Finchley Town Centres are totally out of keeping with the suburban context of these Town Centres and their hinterland and the prospect of more of them creating mini-Croydons is totally inappropriate. Equally, these Town Centres are already "landmarked" by the existing tall buildings and there is no need or justification for the Council to add to them.

Further, the topographical location of Finchley Church End and North Finchley Town Centres on a ridge makes the existing tall buildings stick out like a "sore thumb" for miles around and further detracts from the suburban nature of these areas.

In the case of North Finchley, the Tally Ho development, which is locally known as "The Monstrosity", has been particularly unsuccessful and the advice that any wind tunnel effect at street level had been designed out has proved inaccurate. Additionally, there is more than a suspicion that its choice as a location for tall buildings has much to do with the development potential of the Council owned Lodge Lane car park site and, if so, this should not be a planning consideration.

If you are Objecting, what changes are you seeking?:

Amend Policy CS 5 Tall Buildings paragraph by the deletion of the words:

"And the Priority Town Centres of Edgware, Finchley Church End and North Finchley"

Council’s response :

We consider that these priority town centres are suitable locations for tall buildings and this is supported by our Tall Buildings Study.

The Study examined the distribution of existing tall buildings in order to provide clearer direction on where such buildings can work well.

Finchley Church End and Edgware were identified as town centre clusters whilst North Finchley was identified for being on a historical corridor

Our approach to tall buildings is more restrictive than in the adopted UDP (Policy D17 - High Buildings - Acceptable Locations). The UDP approach could allow proposals outside the strategic locations identified in Policy CS5

DM05 on Tall Buildings also provides further safeguards with regard to proposals for tall buildings (both new and existing).

Further discussion on the contribution of tall buildings in these centres will come forward through the Town Centre Frameworks.

Representation No: 570 / 2

Name : Mr Robert Newton

Organisation : Resident

Policy

Chapter:

Paragraph:

10.6.7

Reason for Objecting or Supporting?:

The last two sentences of Paragraph 10.6.7 are a partisan and unjustified interpretation of the Tall Buildings Study of the London Borough of Barnet (Final report – November 2010) and should be deleted.

If you are Objecting, what changes are you seeking?:

Amend Paragraph 10.6.7 by deleting the second and third sentences that read “These Priority Town Centres public transport accessibility” and “Future proposals visibility and importance”.

Council’s response :

We consider that our approach is supported by the Tall Buildings Study and that these sentences are not a misinterpretation of this part of the LDF evidence base.

Representation No: 571 / 1

Name :

Organisation : A2Dominion Housing

Policy

Chapter: General comment

Paragraph:

Reason for Objecting or Supporting?:

We note the Council's position with regard to comments focusing on the amendments rather than the whole document. However, this consultation exercise falls under Regulation 27, as set out in the Town and Country Planning (Local Development) (England) Regulations 2008. Accordingly, until the Core Strategy has been formally lodged to the Secretary of State, the complete document is still available for comment. We have therefore prepared representations accordingly.

If you are Objecting, what changes are you seeking?:

Council's response :

This is incorrect.

The opportunity for making comments on the full document was at Publication Stage in September 2010.

We have clearly stated that the purpose of the consultation on Pre Submission Amendments has been to resolve objections made to the previous stage of the Core Strategy. The consultation provided an opportunity for those who have made objections to the Core Strategy at Publication Stage (Reg 27) to withdraw their comments. This will enable the Inspector at the Examination in Public to focus on areas of contention. Comments that are not related to the listed changes will not be considered.

We made this clear in our consultation letter of May 11 and on the Core Strategy Pre Submissions Amendments document, the Core Strategy Submission Stage document, the representation form and the LDF consultation web page for the Pre Submission Amendments.

We consider comments that do not relate to Pre Submission Amendments to be NOT DULY MADE

Representation No: 571 / 2

Name :

Organisation : A2Dominion Housing

Policy Policy CS 3 Distribution of growth in meeting housing aspirations

Chapter:

Paragraph: 8.1.1-8.3.2

Reason for Objecting or Supporting?:

A2Dominion provides over 33,000 homes across London and southern England with thousands in development. It offers a wide range of housing options, including affordable rented, temporary, student, sheltered, supported and key worker accommodation, as well as homes for sale and shared ownership.

A2Dominion is the owner of the Geron Way site in Cricklewood, London, hereafter referred to as "the Geron Way site". Through our previous discussions, you will be aware that our client has submitted a planning application on the site (ref F/01932/11) for:

"Redevelopment to provide for 262 residential units, 812 sqm of commercial accommodation (B1, D1 and D2) and associated car parking and amenity space, and creation of new vehicular access from Edgware Road."

This planning application is currently being considered by the London Borough of Barnet.

The Site extends to 1.453 ha and falls within the London Borough of Barnet Cricklewood, Brent Cross and West Hendon Regeneration Area.

Please note that representations have also been submitted on behalf of A2Dominion on the Development Management Policies Development Plan Document (DPD).

Planning Policy Statement 12 (PPS12) Guidance on Soundness

This letter of representation highlights the key areas of support or objection that are most relevant to the Geron Way site. Principally, our comments are made in accordance with the guidance set out in Planning Policy Statement 12 (PPS12) – Local Spatial Planning (2008) which describes the 'tests' for assessing whether a development plan document is sound.

To be sound, a DPD should be justified, effective and in line with national planning policy:

"Justified' means that the document must be:

- Founded on a robust and credible evidence base;
- The most appropriate strategy when considered against the reasonable alternatives.

'Effective' means that the document must be:

- Deliverable;
- Flexible; and
- Able to be monitored." (PPS12, page 24)

A2Dominion seeks to ensure that the emerging policies within the new LDF are the most appropriate in all circumstances, that they are founded on a robust evidence base and ensure that the plan is reasonably flexible to enable it to deal with changing circumstances and comply with national planning policy.

Core Strategy

The purpose of a Core Strategy is to set out the overall vision, strategic objectives for an area and the delivery strategy for those objectives (paragraph 4.1). It should also be in general conformity with the London Plan (paragraph 4.2). It is appropriate for a Core Strategy to allocate strategic sites that are considered to be central to the achievement of the strategy (paragraph 4.6). However as a document that looks to the long term it should not include site specific detail that will date quickly (paragraph 4.7).

In the context of the above, in our view the issues to be tested at the Examination are:

1. Is the policy effective - Does it set out the vision, strategic objectives, delivery strategy and monitoring for this strategic site? Is it sufficiently flexible?

Is the policy effective?

The London Plan (2008) sets a housing target of 20,550 for the London Borough of Barnet up until 2016/17. The Draft Replacement London Plan sets a housing target of 22,550 for the London Borough of Barnet up until 2021, which equates to 2,255 dwellings per annum. The Draft Replacement London Plan Panel Report recommends that greater emphasis is given to these housing targets being a minimum provision.

Policy CS3 'Distribution of Growth in Meeting Housing Aspirations' seeks approximately 28,000 new homes within the lifetime of the Core Strategy (2011/12 to 2025/26). It is unclear how these figures were reached, and how they relate to the London Plan target. The Draft Replacement London Plan Panel Report states that housing targets should

be treated as a minimum provision. Consequently, housing targets should be set in the context of trying to exceed London Plan targets, to accord with regional planning policy. Having reviewed the housing targets set out in Policy CS3, it appears that there is an under provision. To meet the justification test, housing figures must be based on a sound evidence base. Further clarity is therefore sought on these revised housing figures, to ensure figures are substantiated.

If you are Objecting, what changes are you seeking?:

We are supportive of the Core Strategy, but object to the reduction in housing provision, as set out in Policy CS3. These figures are not substantiated in the evidence base, and therefore cannot be considered justified, inline with Planning Policy Statement 12: Local Spatial Planning.

Council's response :

This issue was not raised in A2 Dominion Housing's representations on Policy CS3 at Publication Stage (495/3)

The Core Strategy is in general conformity with the London Plan with the Mayor recognising that the Pre Submission Amendments give stronger emphasis in Policy CS 1 to meeting the London Plan target of 22,500 by 2021.

The figure of 28,000 new homes was not subject to Pre Submission Amendment therefore this objection is NOT DULY MADE

Representation No: 571 / 3

Name :

Organisation : A2Dominion Housing

Policy Policy CS 2 Brent Cross - Cricklewood

Chapter:

Paragraph: 7.5.1-7.5.2

Reason for Objecting or Supporting?:

A2Dominion provides over 33,000 homes across London and southern England with thousands in development. It offers a wide range of housing options, including affordable rented, temporary, student, sheltered, supported and key worker accommodation, as well as homes for sale and shared ownership.

A2Dominion is the owner of the Geron Way site in Cricklewood, London, hereafter referred to as "the Geron Way site". Through our previous discussions, you will be aware that our client has submitted a planning application on the site (ref F/01932/11) for:

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This planning application is currently being considered by the London Borough of Barnet.

The Site extends to 1.453 ha and falls within the London Borough of Barnet Cricklewood, Brent Cross and West Hendon Regeneration Area.

Please note that representations have also been submitted on behalf of A2Dominion on the Development Management Policies Development Plan Document (DPD).

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This letter of representation highlights the key areas of support or objection that are most relevant to the Geron Way site. Principally, our comments are made in accordance with the guidance set out in Planning Policy Statement 12 (PPS12) – Local Spatial Planning (2008) which describes the 'tests' for assessing whether a development plan document is sound.

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A2Dominion seeks to ensure that the emerging policies within the new LDF are the most appropriate in all circumstances, that they are founded on a robust evidence base and ensure that the plan is reasonably flexible to enable it to deal with changing circumstances and comply with national planning policy.

Core Strategy

The purpose of a Core Strategy is to set out the overall vision, strategic objectives for an area and the delivery strategy for those objectives (paragraph 4.1). It should also be in general conformity with the London Plan (paragraph 4.2). It is appropriate for a Core Strategy to allocate strategic sites that are considered to be central to the achievement of the strategy (paragraph 4.6). However as a document that looks to the long term it should not include site specific detail that will date quickly (paragraph 4.7).

In the context of the above, in our view the issues to be tested at the examination are:

1. Is the identification of Cricklewood/ Brent Cross justified?
2. Is the policy effective - Does it set out the vision, strategic objectives, delivery strategy and monitoring for this strategic site? Is it sufficiently flexible?

Is the identification of Cricklewood/ Brent Cross justified?

The London Plan 2008 allocates Cricklewood/ Brent Cross as an Opportunity Area which is capable of accommodating substantial new jobs or homes. Notably, Table 5B.1 'Opportunity Areas and Areas for Intensification in North London' states that Cricklewood/ Brent Cross has an indicative employment capacity of 20,000 and housing capacity of 10,000.

The replacement London Plan reinforces this in Annex 1. Furthermore, it states that

"Brent Cross /Cricklewood also has significant potential for wider economic development, new housing and regeneration, capitalising on public transport improvements including Thameslink and the Northern Line upgrade...Brent Cross is to be redeveloped to become a town centre complementing the roles of other centres nearby and with

an extended mix of town centre activities. This should include a significant increase in new housing together with local ancillary services. A rail station on the Cricklewood site is proposed and new development should be phased with improvements to public transport and accessibility...”

The Panel Report supports the continued identification of the Opportunity Areas, stating that “the bulk of the provision will be achieved within the Opportunity and Intensification Areas”.

It is therefore correct and appropriate for the Core Strategy to identify Cricklewood/ Brent Cross as a ‘Regeneration Area’ in Policy CS2.

Is the policy effective?

As drafted, Policy CS2 does not read as a policy but a review of the current status of the planning application for the wider site (now permitted) and a cross reference and reliance on other policy documents to set out the vision, some of which are in themselves dated. We note the reluctance to review the existing policy approach, and a desire to provide consistency in approach and not to create a policy vacuum. However the Core Strategy needs to stand as a policy document in its own right and as a result it is not clear what the vision for the area is (whilst headline growth is given elsewhere it should be within the wording of the policy). As drafted it is already dated, is not sufficiently flexible or therefore effective.

To meet the effectiveness test it should set out the growth objectives for the area, vision, delivery strategy and proposed monitoring to a level of detail appropriate for a Core Strategy. In this sense the growth objectives in terms of unit numbers and jobs are also necessary to ensure appropriate SEA and SA testing in terms of cumulative impact in any event.

Supplementary Planning Documents (SPD) can be an appropriate vehicle to test in more detail the vision and delivery mechanisms and provide greater detail on the policies in its DPD, however, the policy should also set out a clear commitment to review the provisions of the current SPG (which is now 6 years old), in the context of inter alia changes in policy, the recent grant of planning permission, how sites are coming forward, how the planning permissions will relate to sites outside of the permission but within the Opportunity Area, associated changes to public transport levels as improvements are made and implications for parking levels and density of development.

If you are Objecting, what changes are you seeking?:

In relation to Policy CS2, the Core Strategy does not read as a policy but a review of the current status of the BXC planning application and reliance on other dated policy documents. The Core Strategy needs to stand as a policy document in its own right and as a result it is not clear what the vision is. As drafted it is already dated, is not sufficiently flexible or therefore effective.

Council’s response :

This issue was not raised in A2 Dominion Housing’s representations on Policy CS2 at Publication Stage (495/4)

The objection does not relate to Pre Submission Amendments to CS2 therefore this objection is NOT DULY MADE

Representation No: 572 / 1

Name : Mr David Howard

Organisation : Federation of Residents Associations in Barnet (FORAB)

Policy

Chapter: General comment

Paragraph:

Reason for Objecting or Supporting?:

FORAB supports the submissions made by the Finchley Society as set out in the email dated 20:55 : 6th June 2011

If you are Objecting, what changes are you seeking?:

Council's response :

We refer to our responses to the Finchley Society

Representation No: 574 / 1

Name : Mr Graham Saunders

Organisation : English Heritage

Policy Policy CS 5 Protecting and Enhancing Barnet's character to create high quality places

Chapter:

Paragraph: AMENDMENT
170

Reason for Objecting or Supporting?:

We recognise that with regards to the management of the tall buildings the Core Strategy has sought to provide greater clarity on where tall buildings will be considered appropriate and inappropriate within the Borough. However there are still areas of clarity required in connection with tall building matters, as some of the wording is potentially inconsistent and unclear in its intention. For example the key policies which seek to provide a robust plan-led approach to tall buildings are CS1, CS4 and CS5. These policies seek to provide a plan-led approach to tall buildings by directing them towards; Brent Cross – Cricklewood; Colindale Avenue; Edgware Road; Grahame Park Estate; Stonegrove and Spur Road Estate; West Hendon; and the Priority Town Centres of Edgware, Finchley Church End and North Finchley. However our concern is how the appropriateness of tall buildings in these locations is expressed as they are currently not consistent. For example:

- Policy CS1 states the Council will “only consider tall buildings in the strategic locations we have identified in Core Strategy Policy CS5 subject to them not having an unacceptably harmful impact on their surroundings”. This approach recognises the need for sensitivity issues as part of considering the appropriateness of tall buildings in these locations.
- Policy CS5 states that “tall buildings (8 storeys (or 26 metres) or more) will only be considered” in the same locations, and that “proposals will be considered in accordance with DM05, London Plan Policy 7.7, and EH/CABE Guidance on Tall Buildings (2007)”. Again this approach recognises that further analysis is needed to establish the appropriateness of tall buildings in these location and reflects policy CS1’s approach.
- However, in contrast to policies CS1 and CS5, in supporting text to Policy CS4, paragraph 10.6.6 states that tall buildings “will be acceptable” in the above same locations. This is an absolute statement of support with no recognition made to the possible sensitivities in these areas.

If you are Objecting, what changes are you seeking?:

To rectify the inconsistency we would advise that, areas identified as being potentially appropriate for tall buildings should be expressed as “may be appropriate”. This should be then further clarified with recognition that detailed analysis will need to be undertaken in each of these potential areas, in order to establish site specific locations where tall buildings may be or not appropriate for tall buildings. It is important to express clearly in the policy or supporting text that this analysis needed and that the identification of these specific areas does not necessary mean that tall buildings will be acceptable in across the whole of the identified area. There is still the potential for sites not being considered appropriate for tall buildings or are subject to specific sensitivity issues, such as the historic context.

For example some of the strategic locations coincide with designated heritage assets such as conservation areas. For clarity we would strongly suggest that the policy wording should recognise that within strategic locations where designations such as conservation areas exist, tall buildings will not be accepted (e.g. Finchley Church End). In addition beyond the strategic locations we would advise that tall buildings will not be considered appropriate. It is noted that in policy DM05, that this point is expressed. Therefore is it accepted that this is the Council’s intention, however we would advise that this a clear statement that states “outside of these specific areas (strategic locations) tall buildings will not be supported”, should be expressed in a Core Strategy policy (i.e. CS1, CS4 and/or CS5), as part of the strategic approach to managing tall buildings.

Council’s response :

As part of the Further Pre Submission Amendments (see Amendment 73) to the Core Strategy the sentence should be changed from 'will be acceptable' to 'may be appropriate'

Representation No: 574 / 2

Name : Mr Graham Saunders

Organisation : English Heritage

Policy Policy CS 5 Protecting and Enhancing Barnet's character to create high quality places

Chapter:

Paragraph: AMENDMENT
168

Reason for Objecting or Supporting?:

In terms of defining what is a tall building it is noted that policy CS5 states "8 storeys (or 26 metres) or more" within the context of the strategic locations. It is important to ensure there is a borough wide definition of tall buildings and that the number of storeys and height identified is appropriately supported by evidence to justify the level of threshold. For reference the EH/CABE Guidance (paragraph 4.1) defines tall buildings as "buildings which are substantially taller than their neighbours and/or which significantly change the skyline". This introduces issues of impact upon skylines and relative relationships of neighbouring buildings, which are useful components to consider.

If you are Objecting, what changes are you seeking?:

Council's response :

Our Tall Buildings Study is a companion piece to the Barnet Characterisation Study. It recognises that the concept of a tall building is relative to context and the Characterisation Study provides that context. Buildings of 8 storeys and above take on the attribute of a tall building in Barnet and therefore creates a definition.

Representation No: 574 / 4

Name : Mr Graham Saunders

Organisation : English Heritage

Policy

Chapter:

Paragraph: AMENDMENT
170

Reason for Objecting or Supporting?:

In addition it is noted that paragraph 20.12.1 refers to the production of tall building guidance for the Edgware Road Corridor of Change, which we understand includes a number of the strategic locations identified in policies CS1, CS4 and CS5. This implies that there is a lack of clarity on the appropriateness of tall buildings in these locations. This highlights our concerns with regards to the lack of evidence to justify the proposed locations for tall buildings and for the tightening of policy wording. We would strongly suggest that the Core Strategy should provide a robust plan-led framework for the management of tall buildings that protects the Borough's heritage assets and the wider historic environment. At present there are still a number of shortcomings which should be addressed.

If you are Objecting, what changes are you seeking?:

Finally there are concerns with regards to the evidence base used to support the identification of the strategic locations for tall buildings. Reflecting our comment to the Tall Buildings Study (letter dated 25th November 2010), many of the strategic locations identified appear to have been justified as being appropriate for tall buildings due to consented planning permissions (as illustrated in paragraph 10.6.6). For example the justification for the majority of the areas identified and the scale of tall buildings considered appropriate are defined and driven by previous consents. Only Colindale Avenue and Edgware Road locations are supported by evidence developed through the Colindale AAP. We would raise caution against the use of previous consents as a justification for the appropriateness of tall buildings in a particular location. The principal driver should be an understanding of the character and distinctiveness of an area and its capacity to accommodate significant change without causing irreversible damage to its environmental characteristics (PPS1 paragraph 19). This includes its historic environment. Reflective of EH/CABE Guidance, this approach ensures that the identification of appropriate locations for tall buildings is plan-led and not developer-led.

Council's response :

We consider that we have a robust evidence base for identifying strategic locations for tall buildings and that we have developed a plan-led framework for the management of tall buildings.

The strategic locations for tall buildings are identified in the key diagram because of their strategic importance.

Brent Cross- Cricklewood is a London Plan Opportunity Area where regeneration is supported by the Development Framework adopted in 2005. The consented scheme for Brent Cross- Cricklewood is in accordance with that Development Framework.

The priority housing estates of Stonegrove and West Hendon have been identified in the Tall Buildings Study as residential clusters. These estates are being regenerated in order to tackle poor quality housing and social isolation and transform them into successful mixed tenure places. The refurbishment/ redevelopment and construction of tall buildings play an important role in this transformation.

The Edgware Road Corridor of Change is identified in the Colindale Area Action Plan adopted in March 2010. This provides the planning framework for Colindale and is therefore not superceded by the Core Strategy. The production of Tall Buildings Guidance with Brent does not imply a lack of clarity as it is clearly connected to the AAP. This Guidance can be taken forward by the AAP Implementation Group

Representation No: 574 / 5

Name : Mr Graham Saunders

Organisation : English Heritage

Policy Policy CS 5 Protecting and Enhancing Barnet's character to create high quality places

Chapter:

Paragraph: AMENDMENTS
150 - 158,176,
342

Reason for Objecting or Supporting?:

In general we support the changes proposed principally in relation to policy CS5 and climate change issues. However further amendments could be made to help ensure the Council's approach to conservation is appropriately positive and proactive as advised in PPS5. For example:

We welcome the emphasis upon further improvements in conservation areas and the development of a programme. However we would advise that this programme should include all heritage assets, yet identified and yet to be identified through both the plan making and decision making processes.

In addition it is not clear whether there is a commitment by the Council to reduce those heritage assets identified on the EH Heritage At Risk (HAR) Register. At present there are 13 listed buildings, 1 scheduled monument and 2 conservation areas on the 2010 Register. A key indicator could be to reduce the HAR list as part the positive delivery of the Core Strategy.

If you are Objecting, what changes are you seeking?:

Council's response :

We welcome the support from English Heritage for the changes made to CS5 and CS13.

We have an indicator on Buildings at Risk in Appendix B of the Core Strategy

Representation No: 575 / 1

Name : Mr M W G Scott

Organisation : Garden & Plant Centre Developments Ltd

Policy

Chapter:

Paragraph:

2.3.4

Reason for Objecting or Supporting?:

The Green Belt and Metropolitan Open Land

Reference is made throughout the Core Strategy to Barnet's Three Strands Approach which states as Strand 1 "Absolute protection of the Green Belt, Metropolitan Open Land and other valued open space from inappropriate development." In paragraph 2.3.4 the Core Strategy states "Most importantly, the Green Belt and the one third of the Borough that comprises green open spaces, is protected from future urbanisation and development to ensure a high-quality suburb."

If you are Objecting, what changes are you seeking?:

Nowhere however in the document is there any reference to an assessment being made of the utility or value of all this Green Belt and Metropolitan Open Land (MOL). Is it all of the same value? Is all of it open and accessible to public use?

Council's response :

This repeats Garden & Plant Centre Developments representation at Publication Stage 507/1 and we refer to our previous response made on this matter

Representation No: 575 / 2

Name : Mr M W G Scott

Organisation : Garden & Plant Centre Developments Ltd

Policy

Chapter:

Paragraph:

6.2.1

Reason for Objecting or Supporting?:

Paragraph 6.2.1: "To enhance and protect our green and natural open spaces – to improve access to and enhance the quality of the Green Belt, Metropolitan Open Land and other open spaces as spaces for recreation and biodiversity."

If you are Objecting, what changes are you seeking?:

However, not all Metropolitan Open Land is available for recreation. It is not all public open space.

Council's response :

This repeats Garden & Plant Centre Developments representation at Publication Stage 507/2 and we refer to our previous response made on this matter

Representation No: 575 / 3

Name : Mr M W G Scott

Organisation : Garden & Plant Centre Developments Ltd

Policy

Chapter: Chapter 10 - Protecting and enhancing Barnet's character
Paragraph: to create high quality places

Reason for Objecting or Supporting?:

Enhancement and Protection of Barnet's Suburbs

The second Strand referred to in the Core Strategy is as follows:

"Strand 2: Enhancement and protection of Barnet's suburbs, town centres and historic areas."

Reference is made throughout the Core Strategy to the value of the suburbs as a successful living environment. The typical Barnet suburban street is however not the pattern of development that is proposed for the new housing to meet the requirements of families in the future. For these people they are to be housed, as it states in paragraph 2.3.4, in: "New development in the most accessible locations around public transport modes and town centres where social and physical infrastructure is to be improved." This inevitably, means high density, and often high rise, housing development largely unsuitable for families, which include children, who need access to private and public open space.

It goes on to state: "This broad approach can meet the sustainable design principles for a compact city" and yet elsewhere, in paragraph 2.5.3, there is reference to

"Provide increased housing choice" and, in paragraph 6.2.1: "To provide a range of housing, including family and extra care accommodation".

In 8.2.2 it states: "Town centre locations may not be suitable for the majority of families or for those who need access to their own car, as parking is likely to be restricted."

In Chapter 9, paragraph 9.1.1, it states: "We need to maximise housing choice, providing a range of sizes and types of accommodation."

"This includes homes for those who need larger dwellings including families."

In 9.2.3 it states: "Barnet's Core Strategy has to address the demands for family accommodation at lower densities."

Yet the proposed solution to meeting the majority of housing needs in the borough, is redevelopment of existing estates which will increase housing density at Colindale, West Hendon – Cricklewood. This housing development may meet the requirements of single person and small householdes but does not meet family housing requirements.

If you are Objecting, what changes are you seeking?:

Council's response :

This repeats Garden & Plant Centre Developments representation at Publication Stage 507/3 and we refer to our previous response made on this matter

Representation No: 575 / 4

Name : Mr M W G Scott

Organisation : Garden & Plant Centre Developments Ltd

Policy

Chapter: Chapter 7 - Barnet's place shaping strategy

Paragraph:

Reason for Objecting or Supporting?:

Housing Requirements

Paragraph 7.2.6 states: "In the adopted London Plan, Barnet has been set a housing target of 20,550 new homes over the 10-year period 2007/8 – 2017/18. This equates to an annual housing target of 2,055 new homes per annum."

It further states: "Following completion of the Mayor's Strategic Housing Land Availability Assessment the revised housing target for Barnet is 22,550 new homes equal to 2,255 new homes per annum over the 10-year period 2011/12 – 2021/22."

If you are Objecting, what changes are you seeking?:

Council's response :

This repeats Garden & Plant Centre Developments representation at Publication Stage 507/4 and we refer to our previous response made on this matter

Representation No: 575 / 5

Name : Mr M W G Scott

Organisation : Garden & Plant Centre Developments Ltd

Policy Policy CS 3 Distribution of growth in meeting housing aspirations

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Policy CS3 – Distribution of Growth in Meeting Housing Aspirations states where the focus of growth will be in terms of meeting these housing numbers. The main thrust of the Policy is that the overwhelming majority of new homes will be provided in redevelopment of existing estates and town centre houses at a higher density to create high-density housing development.

There are two problems with this Policy:

i. An over-reliance on Major Redevelopment Projects to create the new housing. Complicated land assembly and development schemes often in practice lead to these programmes missing their delivery timetables. These programmes, which are of mixed use form, rely on a sustained period of national economic growth to deliver a trajectory of upward-moving commercial and retail rents as well as mortgage availability for developers to commit to such projects. The current economic climate is not encouraging for major development to adhere to the proposed timetable and deliver housing within the set programme. Five year housing supply targets are thus unlikely to be met.

ii. Even assuming that the necessary family housing can be provided in the format of family-sized, three- and four-bedroom flats in multi-storey and high-density developments, these units have proved in the 1960's – 1970's to be often suitable for families with small children. Indeed, it is only now that some of the more expensive mistakes of the 1960's high density housing developments, in terms of putting families into high-rise, high-density developments, such as Chalk Hill in the adjacent London Borough of Brent, have been expensively rectified. This estate has now been redeveloped to create low-rise family housing with private open space.

If you are Objecting, what changes are you seeking?:

Council's response :

This repeats Garden & Plant Centre Developments representation at Publication Stage 507/4 and we refer to our previous response made on this matter

Representation No: 575 / 6

Name : Mr M W G Scott

Organisation : Garden & Plant Centre Developments Ltd

Policy

Chapter: General comment

Paragraph:

Reason for Objecting or Supporting?:

The Barnet Core Strategy is not a sustainable document in terms of creating a long term stable socio-economic future for the borough. There is no analysis of the quality or distribution of the Green Belt or, Metropolitan Open Land within Barnet in relation to the need for Public Open Space. The absolute safeguarding of all Green Belt and Metropolitan Open Land, whether it fulfils any open space or other useful purpose or not, places an excessive pressure on the land remaining, particularly given that the existing low-density suburbs are to be also retained. The inevitable result is that the additional necessary new housing, including a significant and part of this housing demand, for families, is to be located in high-density developments. This is at odds with the high value placed on existing suburban living, and with the lessons learned from locating families in high-rise and high-density developments in the 1960's and 1970's.

If you are Objecting, what changes are you seeking?:

Council's response :

This repeats Garden & Plant Centre Developments representation at Publication Stage 507/5 and we refer to our previous response made on this matter

Representation No: 576 / 1

Name : Mr Peter Pickering

Organisation : Finchley Society

Policy Policy CS 4 Providing quality homes and housing choice in Barnet

Chapter:

Paragraph:

Reason for Objecting or Supporting?:

Because it says in the last paragraph that the Council will seek to maintain supply [of new homes] at the rate necessary to meet or exceed the target. There is no justification in this chapter for anything greater than the target figures, and greater growth in the population of Barnet would be environmentally and socially damaging.

If you are Objecting, what changes are you seeking?:

Delete "or exceed"

Council's response :

This repeats the Finchley Society representation at Publication Stage 512/3 and we refer to our previous response made on this matter

Representation No: 576 / 2

Name : Mr Peter Pickering

Organisation : Finchley Society

Policy Policy CS 5 Protecting and Enhancing Barnet's character to create high quality places

Chapter:

Paragraph: AMENDMENT
177

Reason for Objecting or Supporting?:

Because Finchley Church End and North Finchley are not suitable locations for any more tall buildings.

If you are Objecting, what changes are you seeking?:

Delete the references to Finchley Church End and North Finchley.

Council's response :

We consider that these priority town centres are suitable locations for tall buildings and this is supported by our Tall Buildings Study.

The Study examined the distribution of existing tall buildings in order to provide clearer direction on where such buildings can work well.

Finchley Church End was identified as a town centre cluster whilst North Finchley was identified for being on a historical corridor

Our approach to tall buildings is more restrictive than in the adopted UDP (Policy D17 - High Buildings - Acceptable Locations). The UDP approach could allow proposals outside the strategic locations identified in Policy CS5

DM05 on Tall Buildings also provides further safeguards with regard to proposals for tall buildings (both new and existing).

Further discussion on the contribution of tall buildings in these centres will come forward through the Town Centre Frameworks.

Representation No: 576 / 3

Name : Mr Peter Pickering

Organisation : Finchley Society

Policy Policy CS 9 Providing effective and efficient travel

Chapter:

Paragraph:

14.7

Reason for Objecting or Supporting?:

Because of its focus on car travel it is not consistent with national policy (as instantiated e.g. in PPS1 paragraph 27 "(v) Provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space, sport and recreation, by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, while recognising that this may be more difficult in rural areas. " nor is it justified because it gives no attention to the interests of pedestrians

If you are Objecting, what changes are you seeking?:

The addition of a discussion of, and a policy for, walking in the borough.

Council's response :

This repeats the Finchley Society representation at Publication Stage 512/2 and we refer to our previous response made on this matter

Representation No: 576 / 4

Name : Mr Peter Pickering

Organisation : Finchley Society

Policy Policy CS 10 Enabling integrated community facilities and uses

Chapter: Chapter 15 - Enabling integrated community facilities and uses

Paragraph:

Reason for Objecting or Supporting?:

CS10 does not adequately recognise the importance of the private sector and of voluntary organisations in the provision of community facilities. Chapter 15 omits reference to the museums (national, council and voluntary) in Barnet.

If you are Objecting, what changes are you seeking?:

Add 'and with the private and voluntary sectors' after 'partners' in the first sentence of CS10. Include in Chapter 15 a discussion of museums.

Council's response :

This repeats the Finchley Society representation at Publication Stage 512/6 and we refer to our previous response made on this matter
