

**Our ref:** Q10102  
**Your ref:**  
**Email:** [REDACTED]  
**Date:** 09 August 2021



Planning Policy Team  
7th Floor  
2 Bristol Avenue  
Colindale  
London  
NW9 4EW

By Email

Dear Sir/Madam

## **London Borough of Barnet: Draft Local Plan (Reg 19) 2021 to 2036 (June 2021) Representations by Barratt London**

We are instructed by our client, BDW Trading Limited (“Barratt London”), to submit representations to the London Borough of Barnet (“Barnet”) Draft Local Plan (“Regulation 19 Plan”) Consultation. These representations follow Barratt London’s previous representations (dated 16<sup>th</sup> March 2020) to the Regulation 18 Plan Preferred Approach Consultation Draft in January 2020 and are made prior to the expiry of the consultation period on 9<sup>th</sup> August 2021.

### **1 Background**

Previous representations have provided information about Barratt London and their recent investment in Barnet.

To summarise:

- Barratt London is a market-leading residential developer with nearly 40 years’ experience delivering high-quality homes in the capital. Barratt London have an extensive portfolio of developments across London.
- Barratt London has made a major contribution to the delivery of new high-quality homes and investment in Barnet. Recently Barratt London has invested significantly in the regeneration of Stonegrove and Spur Road Estate known as Evolution in the north of the Borough. It has also created a new residential setting for the Welsh Harp known as Hendon Waterside, delivering new homes, community facilities and a new waterside park. Barratt London has committed to delivering at least 3,752 homes for the Borough of which 1,471 are affordable homes.

Barratt London recognises the ambitions of Barnet, and wishes to work with the authority to deliver the following recognised objectives (summarised) for the Borough, as set out within the Regulation 19 Plan:

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- To respond and recover from the impact of COVID 19
- To deliver growth to meet housing aspirations and needs.
- To improve the quality and types of housing across the Borough in response to resident needs and demographic change.
- To make Barnet a place of economic growth and prosperity.
- To improve connectivity and sustainable travel options.
- To conserve and enhance the distinctive character and identity of Barnet's town centres and suburbs.
- To support strong and cohesive communities and promote healthy living and wellbeing.
- To deliver an environmentally sustainable Borough.
- To ensure new development is high quality, sustainable, and capable of adaption to meet the needs of residents over their lifetime.

Barratt London can help achieve these objectives.

## 2 Conformity with the London Plan and National Planning Policy

Barratt London are generally supportive of the Regulation 19 Plan, notably in seeking efficient use of previously developed land to meet boroughs needs as well as the Councils vision to focus growth around town centres and other key transport nodes. We understand the Borough's challenge in delivering the levels of forecast growth balanced against the need to maintain the quality of the environment.

However owing to the existing policy direction within National Policy and adopted London Plan, we comment on a number of policies within the Regulation 19 Plan to ensure that they are sound, and in particular that they are flexible, effective and consistent with national policy.

## 3 Regulation 19 Plan Policies and Comments

### Housing

#### *Policy GSS01 Delivering Sustainable Growth*

##### *Growth Areas*

Policy GSS01 sets out that new housing development will be delivered through a number of different components of supply, with the delivery of new homes mostly being located in 6 Key Growth Areas. Paragraph 16.6.1 defines Growth Areas as *“distinctive locations with good public transport accessibility. They have a supply of brownfield and underused land and buildings that offer opportunities for inward investment”*.



Whilst the former West Hendon Estate forms part of the Estate Renewal and Infill Strategic category at Policy GSS01(d), it is considered that West Hendon Estate should be its own stand-alone growth area given that it too is a distinctive location overlooking the Welsh Harp and with good public transport accessibility, that has and will provide substantial capacity for new homes and jobs. West Hendon is one of the Council's Key Priority Housing Estates for Regeneration under the currently adopted Barnet Local Plan (Core Strategy, 2012).

The 2004 London Plan previously identified Cricklewood/Brent Cross/West Hendon as an Opportunity Area with the potential to provide a minimum of 10,000 new homes. A planning framework for the Opportunity Area was subsequently prepared jointly by London Borough of Barnet and the Mayor. The Council adopted it as Supplementary Planning Guidance (SPG) in April 2004 and the Mayor subsequently adopted it as his Opportunity Area Planning Framework in December 2005. The SPG, which has not been superseded, identifies the former West Hendon Estate as the "West Hendon Residential Quarter and Local Centre".

Hybrid planning was granted in 2013 for the demolition and redevelopment of the Estate to accommodate up to 2,000 homes in buildings ranging from 2 to 29 storeys as well as associated landscape and highway works, and the provision of two new pedestrian bridges across the Welsh Harp. This forms a baseline for redevelopment but in line with London Plan policies, there is an expectation of site optimisation where this can be supported through a design led approach.

The history to the Site as well as its' SPG status is an important material consideration which reaffirms the position that West Hendon should be its own stand-alone growth area.

Policy GSS01(a) should therefore be amended to include a new bullet point after bullet point 6:

- *West Hendon Estate – Minimum 2,000 homes (Policy GSS10)*

Barnet's Growth Areas which are shown on Map 2 'the Key Diagram' should be updated to reflect the inclusion of the West Hendon Estate. In addition, the West Hendon Estate should also be included as a key Growth Area in respect to paragraph 4.8.2.

#### *Minimum Targets*

Whilst it would be more appropriate to establish a housing target for the Local Plan that responds to the Government's Standard Methodology, if the Borough justifies maintaining a lower minimum housing target, then we continue to urge that the policies of the Local Plan should be worded to support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality.

It is acknowledged that Policy BSS01 establishes the minimum borough wide housing target. However, this aspiration for the housing target to be exceeded where appropriate is not implicit within emerging policy GSS01. Given the pressing need for housing delivery, this policy should be worded to ensure that a positive presumption exists for the delivery of additional residential units in excess of



the minimum target, subject to assessment of any proposal in the context of other material planning considerations and responding to the direction of the London Plan's emphasis upon site capacity being based on design-led optimisation. The figure expressed in its current form suggest rigidity rather than flexibility.

The Secretary of State in his directions to the Mayor of London including the 13<sup>th</sup> March 2020 informed the Mayor that housing targets should be minimums:

*“Your Plan must be brought to the minimum level I would expect to deliver the homes to start serving Londoners in the way they deserve.”*

Under Section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004 there is a legal requirement that all development plan documents must be in general conformity with the London Plan.

#### *Policy GSS10 Estate Renewal and Infill*

In line with the above, we would again welcome the housing target being expressed as a minimum.

### **Housing Mix**

#### *Policy HOU02 Housing Mix*

Barratt London are still concerned that this policy does not go far enough to provide sufficient flexibility on housing mix for sites located in sustainable locations.

The Council's approach to housing mix in Policy HOU02 requires private homes to be predominantly three bedroom and omits any provision of one-bedroom homes, even if they are delivered as part of a mixed development. This is not in conformity with paragraphs 4.10.3 and 4.10.4 of the London Plan which considers one-bedroom units playing a very important role in meeting housing need.

In determining a suitable mix, we urge the Council to also consider including additional criterion to point's c – f of policy HOU02 relating to *“consideration of existing mix of homes surrounding a site”* as well as the *“viability of development”* which are critical determining factors.

### **Tall Buildings and Barnet's Skyline**

#### *Policy CDH04 Tall Buildings*

London Plan Policy D9 (B) relates to locations of tall buildings and is split into three limbs. The first two limbs require Boroughs to determine if there are locations where tall buildings may be an appropriate form of development. These locations and appropriate tall building heights should be identified on maps in Development Plans. The third limb, Part B(3) states that tall buildings should only be developed in locations that are identified as suitable in Development Plans.



The former West Hendon is listed as an identified location for tall buildings under emerging policy CDH04(a) and therefore would be London Plan Policy D9(B) compliant. However, we are concerned that emerging policy CDH04(a) refers to 'buildings of 8 to 14 storeys' which may be appropriate at strategic locations only, including West Hendon. Tall buildings of 15 storeys or more which are defined as 'very tall' will not be permitted unless exceptional circumstances can be demonstrated. Two examples are given such as an Opportunity Area or Growth Area. West Hendon is not currently identified in either despite it still forming part of the adopted Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework SPG.

For this policy to be sound under paragraph 35 of the NPPF, policies should be positively prepared, justified and effective. In our opinion, this policy is not sound because the evidence base underpinning the emerging plan does not reflect the practical implications of the extant planning permission and the physical development on Site.

The former West Hendon Estate is located to the south-west of the Borough and is one of the Council's Key Priority Housing Estates for Regeneration under the currently adopted Barnet Local Plan (Core Strategy, 2012), forming part of the Barnet's Three Strands Approach "Protection, Enhancement and Growth" which sought to guide regeneration in the Borough. It was approved planning permission in 2013 for the demolition and redevelopment of the Estate to accommodate up to 2,000 homes in buildings ranging from 2 to 29 storeys as well as associated landscape and highway works, and the provision of two new pedestrian bridges across the Welsh Harp.

Specifically, four new tall buildings of between 18-29 storeys will front the York Park along the water's edge. Emerging policy CDH04(a) which refers to 14 storeys is inconsistent with this permission. It also demonstrates that West Hendon should be categorised under CDH04(b) where very tall buildings are appropriate.

The London Plan expects boroughs as part of a plan led approach to determine the maximum acceptable height of tall buildings (London Plan paragraph 3.9.2). The Tall Buildings Update (2019) document provides an overview of how buildings heights will be considered throughout the Borough however there is no townscape, heritage, and visual impact analysis available to the public as part of this report or as a standalone evidence base to the local plan consultation.

For that reason, Barratt London propose the following amendment to Policy CDH04(a) and the removal of reference to 8 to 14 storeys because it is not supported by an appropriate local plan policy evidence base:

*"a. Tall buildings ~~(8 to 14 storeys (26 to 46 metres above ground level))~~ may be appropriate in the following strategic locations..."*

Barratt London also consider that the supporting text at paragraph 6.18.6 be amended to read:



*“In addition, the London Plan expects boroughs as part of a plan led approach to determine the maximum acceptable height of tall buildings (London Plan para 3.9.2). When determining planning applications for tall buildings, detailed townscape and visual impact analysis will be required for planning applications to determine the appropriate heights specific to a location.”*

Barratt London welcome the removal of the maximum limit of 28 storeys for very tall buildings from Policy CDH04(b), however are still concerned with the current wording around exceptional circumstances and Opportunity Areas/Growth Areas. What constitutes “exceptional circumstances” is somewhat ambiguous however to have it grouped together with Opportunity Areas/Growth Areas could limit otherwise acceptable development which should be determined via a design-led approach in accordance with the London Plan.

For this reason, Barratt London propose the following amendment to Policy CDH04 (b):

*“b) Tall buildings of 15 storeys or more (‘Very Tall’) will not be permitted unless exceptional circumstances can be demonstrated, or they are ~~such as~~ appropriately sited within an Opportunity Area or Growth Area.*

As per our comments under policy GSS01, we suggest that West Hendon be included as a growth area particularly as it still forms part of the adopted Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework SPG.

## **Parking**

### *Policy TRC03 Parking Management*

Barratt London welcome the revision to the wording of Policy TRC03 part b) with regards to Controlled Parking Zones (CPZ). The inclusion of new wording ‘*if it is deemed a CPZ is necessary...*’ enables flexibility in the application of the policy so as not to hinder development – we are supportive of this.

## **Annex 1 – Schedule of Site Proposals**

### *Paragraph 16.2 Assessing Indicative Residential Capacity of Sites*

Within Annex 1 (Schedule of Site Proposals), the Council has applied the density matrix from the London Plan (2016) to assess the indicative residential capacity of sites (paragraph 16.2.1). The London Plan 2021 deletes this approach to density and instead adopts a design led approach with intention to optimise housing delivery, therefore the Regulation 19 Plan should be updated to reflect this.

Whilst indicative capacities should not be read prescriptively, they may unintentionally raise local communities’ expectations around the appropriate capacity prior to any design analysis. The actual



development capacity of a Site will ultimately need to be determined through the detailed design and planning approval process and this should be made clearer in the Regulation 19 Plan.

#### **4 Conclusion**

Thank you for providing us with the opportunity to comment on the Regulation 19 Plan. On behalf of Barratt London, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional, or national level.

We would be grateful for confirmation of receipt of these representations. Please do not hesitate to contact us via the details at the head of this letter should you require any further information.

Yours sincerely,



Sophia Rainsford  
Associate



**Barnet Draft Local Plan**  
Publication Stage Representations Form

Ref:   (For official use only)
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**PART B - Your representation**

Please complete a separate Part B for each representation and return along with a single completed Part A.

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*Representations must be made on a specific policy or part of the Plan, please state the policy number, paragraph number, figure/table or Policies Map designation.*

Policy GSS01 Paragraph 4.8.2 Figure/Table Barnet's Growth Areas which are shown on Map 2 'the Key Diagram'

Policies Map designation \_\_\_\_\_

**Question 2: Do you consider that this part of the Local Plan is:**

*Tick all that apply, please refer to the guidance note for an explanation of these terms.*

- |  |                              |  |
|--|------------------------------|--|
| a) Legally compliant                     | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| b) Sound                                 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

**Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

*Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.*

**Growth Areas**

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**Continue on a separate sheet if necessary**



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**Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above. Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

### Growth Areas

Policy GSS01(a) should therefore be amended to include a new bullet point after bullet point 6:

***“West Hendon Estate – Minimum 2,000 homes (Policy GSS10)”***

Barnet’s Growth Areas which are shown on Map 2 ‘the Key Diagram’ should be updated to reflect the inclusion of the West Hendon Estate. In addition, the West Hendon Estate should also be included as a key Growth Area in respect to paragraph 4.8.2.

**Continue on a separate sheet if necessary**

#### **Please note:**

*In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.***

**Question 5: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing sessions?**

Yes, I wish to participate in hearing session(s)

No, I do not wish to participate in hearing session(s) /  
I am not seeking modification to the Plan

**Question 6: If you wish to participate at the examination hearings, please outline why you consider this to be necessary.**

*Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.*

The issues raised in the submission are of sufficient strategic importance to be raised in Oral examination.

#### **Declaration of consent**

The personal information you provide on this form will be processed in accordance with General Data Protection Regulations 2018 (GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004 (as amended), and may be used by the Council to contact you if necessary, regarding your submission. Your name, name of organisation, and comments, will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

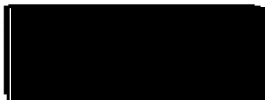
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

The Council's Privacy Notice can be viewed at <https://www.barnet.gov.uk/your-council/policies-plans-and-performance/privacy-notices>

The legal basis which enables the Council to process your data for this purpose is consent from the data subject (you) under Article 6, paragraph (a) of the GDPR. Information provided will be stored in accordance with the Council's retention and disposal guidelines.

**By completing and signing this form I agree to my name, name of organisation, and representations being made available for public inspection on the internet, and that my data will be held and processed as detailed above, in accordance with the Council's Privacy Notice:**

Signature

A black rectangular box redacting the signature.

Date 06/08/2021



**Barnet Draft Local Plan**  
Publication Stage Representations Form

Ref:   (For official use only)
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**PART B - Your representation**

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**Question 1: To which part of the Local Plan does your representation relate?**

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Policy   HOU02   Paragraph                      Figure/Table                     

Policies Map designation                     

**Question 2: Do you consider that this part of the Local Plan is:**

*Tick all that apply, please refer to the guidance note for an explanation of these terms.*

- |  |                              |  |
|--|------------------------------|--|
| a) Legally compliant                     | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| b) Sound                                 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
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<p>Barratt London are still concerned that this policy does not go far enough to provide sufficient flexibility on housing mix for sites located in sustainable locations.</p> <p>The Council’s approach to housing mix in Policy HOU02 requires private homes to be predominantly three bedroom and omits any provision of one-bedroom homes, even if they are delivered as part of a mixed development. This is not in conformity with paragraphs 4.10.3 and 4.10.4 of the London Plan which considers one-bedroom units playing a very important role in meeting housing need.</p> <p>In determining a suitable mix, we urge the Council to also consider including additional criterion to point’s c – f of policy HOU02 relating to <i>“consideration of existing mix of homes surrounding a site”</i> as well as the <i>“viability of development”</i> which are critical determining factors.</p>
--

**Continue on a separate sheet if necessary**

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Please refer to previous text box for revised wording.

**Continue on a separate sheet if necessary**

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The issues raised in the submission are of sufficient strategic importance to be raised in Oral examination.

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**Signature**



**Date** 06/08/2021 \_\_\_\_\_



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**Question 1: To which part of the Local Plan does your representation relate?**

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Policy \_\_CDH04(a) and (b)\_\_\_\_\_ Paragraph \_6.18.6\_\_\_\_\_Figure/Table  
\_\_\_\_\_

Policies Map designation \_\_\_\_\_

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- |  |                              |  |
|--|------------------------------|--|
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*CDH04(a)*

London Plan Policy D9 (B) relates to locations of tall buildings and is split into three limbs. The first two limbs require Boroughs to determine if there are locations where tall buildings may be an appropriate form of development. These locations and appropriate tall building heights should be identified on maps in Development Plans. The third limb, Part B(3) states that tall buildings should only be developed in locations that are identified as suitable in Development Plans.

The former West Hendon is listed as an identified location for tall buildings under emerging policy CDH04(a) and therefore would be London Plan Policy D9(B) compliant. However, we are concerned that emerging policy CDH04(a) refers to buildings of 8 to 14 storeys which may be appropriate at strategic locations only, including West Hendon. Tall buildings of 15 storeys or more which are defined as 'very tall' will not be permitted unless exceptional circumstances can be demonstrated. Two examples are given such as an Opportunity Area or Growth Area. West Hendon is not currently identified in either, despite it still forming part of the adopted Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework SPG.

For this policy to be sound under paragraph 35 of the NPPF, policies should be positively prepared, justified and effective. In our opinion, this policy is not sound because the evidence base underpinning the emerging plan does not reflect the practical implications of the extant planning permission and the physical development on Site.

The former West Hendon Estate is located to the south-west of the Borough and is one of the Council's Key Priority Housing Estates for Regeneration under the currently adopted Barnet Local Plan (Core Strategy, 2012), forming part of the Barnet's Three Strands Approach "Protection, Enhancement and Growth" which sought to guide regeneration in the Borough. It was approved planning permission in 2013 for the demolition and redevelopment of the Estate to accommodate up to 2,000 homes in buildings ranging from 2 to 29 storeys as well as associated landscape and highway works, and the provision of two new pedestrian bridges across the Welsh Harp.

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**Continue on a separate sheet if necessary**



CDH04(b)

Barratt London welcome the removal of the maximum limit of 28 storeys for very tall buildings from Policy CDH04(b), however are still concerned with the current wording around exceptional circumstances and Opportunity Areas/Growth Areas. What constitutes “exceptional circumstances” is somewhat ambiguous however to have it grouped together with Opportunity Areas/Growth Areas could limit otherwise acceptable development which should be determined via a design-led approach in accordance with the London Plan.

**Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above. Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

CDH04(a) / Paragraph 6.18.6

Barratt London propose the following amendment to Policy CDH04(a) and the removal of reference to 8 to 14 storeys because it is not supported by an appropriate local plan policy evidence base:

*“a. Tall buildings (~~8 to 14 storeys (26 to 46 metres above ground level)~~) may be appropriate in the following strategic locations...”*

Barratt London also consider that the supporting text at paragraph 6.18.6 be amended to read:

*“In addition, the London Plan expects boroughs as part of a plan led approach to determine the maximum acceptable height of tall buildings (London Plan para 3.9.2). ~~When determining planning applications for tall buildings, detailed townscape and visual impact analysis will be required for planning applications to determine the appropriate heights specific to a location.~~”*

CDH04(b)

Barratt London propose the following amendment to Policy CDH04 (b):

*“b) Tall buildings of 15 storeys or more (‘Very Tall’) will not be permitted unless exceptional circumstances can be demonstrated, ~~or they are such as~~ appropriately sited~~ing~~ within an Opportunity Area or Growth Area.*

As per our comments under policy GSS01, we suggest that West Hendon be included as a growth area.

**Continue on a separate sheet if necessary**

**Please note:**

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**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

**Question 5: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing sessions?**

Yes, I wish to participate in hearing session(s)

No, I do not wish to participate in hearing session(s) /  
I am not seeking modification to the Plan

**Question 6: If you wish to participate at the examination hearings, please outline why you consider this to be necessary.**

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The issues raised in the submission are of sufficient strategic importance to be raised in Oral examination.

**Declaration of consent**

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**By completing and signing this form I agree to my name, name of organisation, and representations being made available for public inspection on the internet, and that my data will be held and processed as detailed above, in accordance with the Council's Privacy Notice:**

Signature



Date 06/08/2021



**Barnet Draft Local Plan**  
Publication Stage Representations Form

Ref:

(For official use  
only)

**PART B - Your representation**

Please complete a separate Part B for each representation and return along with a single completed Part A.

**Question 1: To which part of the Local Plan does your representation relate?**

*Representations must be made on a specific policy or part of the Plan, please state the policy number, paragraph number, figure/table or Policies Map designation.*

Policy TRC03 Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

Policies Map designation \_\_\_\_\_

**Question 2: Do you consider that this part of the Local Plan is:**

*Tick all that apply, please refer to the guidance note for an explanation of these terms.*

- |  |       |                             |
|--|-------|-----------------------------|
| a) Legally compliant                     | Yes ✓ | No <input type="checkbox"/> |
| b) Sound                                 | Yes ✓ | No <input type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes ✓ | No <input type="checkbox"/> |

**Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.** *Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.*

Barratt London welcome the revision to the wording of Policy TRC03 part b) with regards to Controlled Parking Zones (CPZ). The inclusion of new wording '*if it is deemed a CPZ is necessary...*' enables flexibility in the application of the policy so as not to hinder development – we are supportive of this.

**Continue on a separate sheet if necessary**

**Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above.**

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**Question 5: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing sessions?**

N/A

Yes, I wish to participate in hearing session(s)

No, I do not wish to participate in hearing session(s) /  
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**PART B - Your representation**

Please complete a separate Part B for each representation and return along with a single completed Part A.

**Question 1: To which part of the Local Plan does your representation relate?**

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Policy Annex 1 – Schedule of Sites Paragraph 16.2 Figure/Table  
\_\_\_\_\_

Policies Map designation \_\_\_\_\_

**Question 2: Do you consider that this part of the Local Plan is:**

*Tick all that apply, please refer to the guidance note for an explanation of these terms.*

- |  |                              |  |
|--|------------------------------|--|
| a) Legally compliant                     | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| b) Sound                                 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

**Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

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Within Annex 1 (Schedule of Site Proposals), the Council has applied the density matrix from the London Plan (2016) to assess the indicative residential capacity of sites (paragraph 16.2.1). The London Plan 2021 deletes this approach to density and instead adopts a design led approach with intention to optimise housing delivery, therefore the Regulation 19 Plan should be updated to reflect this.

Whilst indicative capacities should not be read prescriptively, they may unintentionally raise local communities' expectations around the appropriate capacity prior to any design analysis. The actual development capacity of a Site will ultimately need to be determined through the detailed design and planning approval process and this should be made clearer in the Regulation 19 Plan.

**Continue on a separate sheet if necessary**

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Please refer to previous text box for revised wording.

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