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Dear Sir/Madam,

**BARNET DRAFT LOCAL PLAN – PUBLICATION (REGULATION 19) VERSION
REPRESENTATIONS BY BRENT CROSS SOUTH LIMITED PARTNERSHIP ('BXS LP')**

On behalf of our client, Brent Cross South Limited Partnership (hereafter 'BXS LP'), we are writing to submit representations on the Barnet Draft Local Plan (Regulation 19 version) published on 28 June 2021 and associated evidence base documents, particularly the Barnet Local Plan Viability Study (May 2021), West London Alliance Workspace Study (April 2021), Strategic Transport Assessment (June 2021), Car Parking Study and Car Parking Standards Review (June 2021).

BXS LP is bringing forward the comprehensive development of Brent Cross Town (formerly referred to as 'Brent Cross South') within the Brent Cross Growth Area as identified and allocated within the Draft Local Plan and pursuant to outline planning permission reference F/04687/13 (hereafter referred to as 'the outline planning permission' or 'outline consent').

BXS LP welcomes the opportunity to comment on the Draft Local Plan as a key stakeholder within the Borough, particularly given the importance of Brent Cross Town to meeting the objectives and policies in the Plan, including the ambitious housing delivery targets set out in Chapter 4. We are pleased to note that many of the comments set out in our representations to the Regulation 18 version of the Plan have been considered and are reflected in the Regulation 19 draft.

BXS LP continues to support the policy objectives of the Draft Local Plan, and welcomes the importance attached to realising the comprehensive development of the Brent Cross Growth Area, which is capable of delivering very significant regeneration benefits and making a substantial contribution to Borough targets for new homes and jobs. In general, BXS LP considers that the Plan has been well considered and positively prepared. However, in our considered opinion there remain some key areas where the Plan may not be justified, effective, deliverable or consistent with national or London Plan policy.

Detailed comments, by chapter and paragraph, are set out in the schedule on page 6 of this submission, along with our recommendations. Comments have also been provided by Steer, on behalf of BXS LP, in relation to Chapter 11 (along with the Strategic Transport Assessment, Car Parking Study and Car Parking Standards Review). These representations have been enclosed with this letter. Our comments mostly fall into one of five areas of concern, outlined below.



1. The robustness of Policy GSS02 (Brent Cross Growth Area)

Given the importance of the Brent Cross Growth Area in terms of delivering new homes, jobs and infrastructure, it is important that Policy GSS02 – the policy applying specifically to the Brent Cross Growth Area – is fit for purpose and provides the necessary policy support to ensure that the development is deliverable and viable. The policy should allow for optimisation of the site, be worded so that it provides a reasonable level of certainty about what the Growth Area is expected to deliver, and recognise the close relationship of Brent Cross Growth Area to the neighbouring Growth Areas of Cricklewood, Brent Cross West and Staples Corner (in the London Borough of Brent).

We consider that some of the unique opportunities presented by the Brent Cross Growth Area should be explicitly referenced in Policy GSS02, especially where this would provide consistency throughout the Plan. In particular, the policy should state that the Growth Area is, by virtue of being within a London Plan Opportunity Area, a location where site optimisation is supported. As recognised in Chapters 5 and 6 of the Draft Local Plan, the Brent Cross Growth Area is a suitable location for Build to Rent (hereafter 'BtR') development, as well as being appropriate for tall buildings. The policy should explicitly express support for these types of developments.

Policy GSS02 also implies, in the second paragraph, that each development proposal in the Growth Area must meet *all* of the criteria listed, but some of the criteria (for example, restoring and enhancing the River Brent) will not be applicable to *all* proposals. Lastly, the Draft Local Plan refers throughout to residential and commercial 'quarters'. We feel as though this is misleading. Brent Cross Town is a mixed use development and terms that imply the segregation of certain types of uses which are perfectly able to exist alongside one another should be avoided.

In the table below, we have provided some suggested re-wording that we consider would bring the necessary clarity and flexibility to Policy GSS02, whilst providing the policy support to ensure that Brent Cross Town can deliver on the ambitious targets set by the Draft Local Plan.

2. Housing mix policies and BtR

The London Plan 2021 provides that boroughs should take a positive approach to the BtR sector to enable it to better contribute to the delivery of new homes. Within that context, we welcome the reference within the Plan's housing policies to the importance of providing a broad range of tenures, including BtR, to ensure the delivery of a range of housing types. However, whilst the Plan expresses general support for BtR, application of the housing mix policies in Chapter 5 would pose significant viability challenges to actually delivering it. In particular, Policy HOU02 prioritises 3-bedroom units for market rent properties, and one-bedroom units are not supported in any tenure, with the supporting text implying that they are inflexible and will not be encouraged.

If Brent Cross Growth Area is to meet the delivery timescales set out in the Plan, and in order to be a mixed and balanced community overall, it will need to include a range of residential types and products, especially BtR. The provision of smaller units in urban locations is an important part of the successful delivery of BtR development, where demand for one and two bedroom units is greater than in the owner-occupied or social/affordable rented sector and where potential yields and investment risk can be affected by increases in the number of large units within a scheme (as specifically highlighted in the Mayor's Affordable Housing and Viability SPG). Whilst the policy as worded does have some flexibility, we do not consider it goes far enough to provide the requisite policy support for BtR and that more clarity and detail is required.



We suggest that the Plan is clear that policies on housing mix will be applied flexibly to BtR schemes in accessible locations like Opportunity Areas and/or Growth Areas (or, if considered necessary, specifically the Brent Cross Growth Area). This will enable a more permissive approach to BtR without jeopardising the ability of the Local Planning Authority to refuse 'traditional' housing schemes on the basis of an inappropriate housing mix. We have suggested specific amendments to the wording of the policy in the table below.

The Plan provides limited detail on the affordable housing requirements for BtR development beyond reference to London Plan Policy H11 (Policy HOU06, part b). However, the supporting text within paragraph 5.17.2 simply requires *'Discount Market Rent units delivered at a genuinely affordable rent level'*. This in itself is not strictly in accordance with London Plan Policy H11 which requires Discount Market Rent ('DMR') to be provided, with at least 30% provided at London Living Rent levels and the remaining 70% at a range of affordable rents. London Plan Policy H11 includes a footnote in relation to what genuinely affordable rents mean:

'Boroughs may publish guidance setting out the proportion of DMR homes to be provided at different rental levels to benefit from the Fast Track Route. In setting local DMR requirements boroughs should have regard to the relationship between the level of discount required and the viability of achieving the relevant threshold level.'

The Plan provides no such clarity on what is considered to be a genuinely affordable rent, and we request this is included so that the Plan provides certainty in respect of BtR development.

3. Employment policies

Clarity is required as to whether the Brent Cross Growth Area would be considered an 'allocated site' within the context of Policy ECY01 (j) which, based on the current wording, might prevent certain employment uses coming forward at Brent Cross by way of future planning proposals. In particular, we consider that the Brent Cross Growth Area could potentially play an important role in the provision of last-mile logistics, taking advantage of its high accessibility and ability to plan and masterplan the co-location of other uses effectively. We have suggested revised wording to Policy ECY01 to provide the requisite flexibility.

As highlighted throughout the Plan, Brent Cross Growth Area will deliver over 395,000m² of office space, representing the vast majority of Barnet's economic growth over the Plan period. In order to ensure that quantum of space is deliverable, it needs to be attractive to potential occupiers. BXS LP are finding that there is a disparity between office occupier requirements for car parking and the London Plan car parking standards (incorporated into the Draft Local Plan by Policy TCR03). This highlights the difficulties in attracting 'statement' occupiers to outer London locations which are not yet established neighbourhoods or town centres. Whilst we support the Plan's general objectives to support more sustainable modes of transport, we feel that the policy should explicitly recognise that there may be circumstances in which stringent application of London Plan parking standards may not be appropriate (even if such flexibility is applied in the short term or until the new town centre is established). Further detail is set out in the representations by Steer in respect of Chapter 11, appended to this letter.



4. Affordable workspace

We have concerns that the impact of the Plan's affordable workspace policies have not been fully considered as part of the evidence base. The BNP Paribas Real Estate Local Plan Viability Assessment (May 2021) tests the impact of the affordable workspace requirements at paragraphs 6.18 to 6.19, however it is only tested as part of mixed use, residential schemes – the development typologies tested in the assessment are listed at Table 4.5.1. In all cases the provision of commercial floorspace is ancillary to residential. As such, it would appear that the provision of residential is cross subsidising the ability of these typologies to viably support the affordable workspace policies. There is no typology which reflects a commercial-only scheme. Considering the outer London location of the borough, we would expect the viability of a standalone office development to be significantly more challenging. In the absence of a commercial-only typology we suggest that the Council include suitable wording that conditions the provision of affordable workspace by reference to scheme viability.

The Plan provides for affordable workspace obligations to be provided either on or off-site. This is welcomed as in many cases the absolute obligation to provide on-site affordable workspace can affect the feasibility of commercial development. The Plan includes a formula that will be used to calculate off-site contributions, which multiplies the Gross Internal Area (of the affordable workspace requirement were it to be on-site) by a base build cost rate. The rationale for the formula is unclear and we cannot find anything in the West London Alliance Workspace Study that explains the adoption of this formula. The formula has the potential to require significant financial contributions, particularly in a Brent Cross context, so as above, reference to overall scheme viability is needed.

5. Consistency in terminology

Given the complexity of land designations, delivery mechanisms and land ownerships within the Brent Cross/Cricklewood Opportunity Area, it is important that the Plan is clear and consistent in its use of terminology when referring to the Opportunity Area and its constituent and related parts. However, we feel that there are areas of the Plan where the terminology could lead to confusion.

- Throughout the Draft Plan, 'Brent Cross' is used interchangeably to describe the Growth Area and the wider Brent Cross/Cricklewood Opportunity Area, as well as used to describe the Brent Cross area of the borough generally. This should be clarified so that the Brent Cross Growth Area and Brent Cross/Cricklewood Opportunity Area are always referred to by their full name (being careful to ensure that the latter is consistent with the London Plan 2021).
- It should be made clearer how the Growth Areas designated in the Plan relate to and reflect the Opportunity Area as designated in the London Plan 2021. A map showing the Brent Cross/Cricklewood Opportunity Area (including West Hendon and Cricklewood Town Centre) with the Growth Areas delineated with it would be helpful, perhaps at the beginning of Chapter 4 of the Plan. This would help to show the interrelationship between these designations, rather than showing the three growth areas on three separate maps.
- The impression is given that the outline planning permission, which is referred to throughout the Plan, covers only the Brent Cross Growth Area. However, the red line boundary of the outline consent also applies to parts of the Brent Cross West Growth Area and a very small part of the Cricklewood Growth Area as designated in the Plan.



- The name of the Brent Cross West Growth Area is confusing as this is the name used in the outline planning permission and subsequent applications to describe the sub-area where the new Thameslink Station is being developed. We suggest an alternative name is adopted to avoid confusion.
- We would suggest that the terms used to describe the constituent parts of Brent Cross Growth Area – including Brent Cross Town – are included within the Glossary (the term ‘Brent Cross Town’ is used several times before it is fully explained in Chapter 4).

We have highlighted in the table below the specific instances where the terminology might be changed to provide clarity.



Detailed comments by chapter

Chapter 2 – Challenges and Opportunities	
2.4.1	<p>To reflect para. 5.17 of the Draft Plan, the contribution of BtR development to meeting Barnet’s housing needs should be specifically recognised here. The following wording is suggested:</p> <p><i>It will support opportunities for tenure diversity when it can bring development forward quicker and will support Build to Rent development in appropriate locations. It may also consider precision manufactured housing on long term regeneration sites as an appropriate option in addressing Barnet’s housing needs.</i></p>
Chapter 3 – Vision and Objectives	
Key Diagram	<p>The Key Diagram does not reflect the full extent of the Brent Cross/Cricklewood OA, as designated in the London Plan 2021. The map is also inconsistent in the way it shows the various designations – both Brent Cross Growth Area and Cricklewood Growth Area are within the OA, but the former is shown only as an OA (yellow) and the latter only as a Growth Area (orange). It is also considered that the Key Diagram should show the future planned Metropolitan Town Centre at Brent Cross (consistent with the objectives of Policy GSS02 and the development consented by the outline planning permission).</p>
Chapter 4 – Growth and Spatial Strategy	
4.5.2	<p>The reference to ‘Brent Cross’ here is referring to the Brent Cross Growth Area, and should be referenced as such to avoid confusion. The following wording is suggested in the interests of clarity and consistency:</p> <p><i>The BELR concluded that efforts should be focused on protecting employment land and estimated that Barnet required, in addition to <u>the office space consented in the Brent Cross Growth Area</u>, another 67,000 m2 of new office space.</i></p>
4.5.5	<p>The reference to ‘Brent Cross’ here is referring to the Brent Cross Growth Area, and should be referenced as such to avoid confusion.</p>
4.6.2	<p>The reference to ‘Brent Cross’ here is referring to the Brent Cross Growth Area, and should be referenced as such to avoid confusion.</p>
4.8.2	<p>It is suggested that this paragraph is re-worded to provide consistency. The following wording is suggested:</p> <p><i>Delivery of new homes will mostly be in the key Growth Areas of Brent Cross, <u>Brent Cross West and Cricklewood (Brent Cross/Cricklewood Opportunity Area)</u>, Colindale (<u>Colindale/Burnt Oak Opportunity Area</u>), Mill Hill East and Brent Cross West, Edgware and Cricklewood alongside new housing in the Borough’s Town Centres. Each of these growth locations is distinctive and the Local Plan will respond to these individual characteristics to ensure good place-making.</i></p>



<p>Table 5</p>	<p>We query whether the indicative homes delivery for Brent Cross Growth Area is correct, given that 9,500 is the indicative capacity set out in the London Plan for the Brent Cross/Cricklewood Opportunity Area as a whole (including Brent Cross West and Cricklewood Growth Areas). The outline permission for the Brent Cross Growth Area controls residential uses by floor area (rather than units), but provides an indicative unit number of around 7,550.</p> <p>Notwithstanding this, the eventual residential output will be determined at detailed design stage and owing to the fact that BXT is set to deliver a range of residential products, any figures in this table should be referenced as a minimum, and this should be made clear in Table 5 (see comments regarding site optimisation in Policy GSS02 below).</p>
<p>GSS01</p>	<p>Part (a) of this policy should refer to ‘Brent Cross Growth Area’ rather than the OA. See also comments above regarding housing numbers.</p>
<p>4.9.2</p>	<p>Here, the Plan refers to the Brent Cross Cricklewood Opportunity Area, when it is actually discussing the Growth Area. It is suggested that these paragraphs are amended to provide consistency, as follows:</p> <p><i>The Brent Cross Cricklewood Opportunity Area Growth Area covers 151 hectares, with proposals including a new commercial quarter uses and a Metropolitan Town Centre, incorporating and connected to Brent Cross Shopping Centre. The Opportunity Brent Cross Growth Area sits in close proximity to Growth Areas at Cricklewood Town Centre and Brent Cross West as well as the Staples Corner Growth Area in LB Brent.</i></p>
<p>4.9.4</p>	<p>The outline consent also covers part of the Brent Cross West Growth Area as shown on Map 3A. It is therefore suggested that the text is amended as follows:</p> <p><i>Based on the 2005 Development Framework outline planning permission was granted in 2010 for the comprehensive redevelopment of the whole of the Brent Cross Growth Area (along with parts of the Brent Cross West Growth Area) to create a new mixed use town centre with an additional 56,600m² of comparison retail floorspace; approximately 7,500 new homes including affordable homes; a new and commercial quarter uses with a forecast of over 20,000 new jobs, all underpinned by improvements to the strategic highway network, a new rail station as part of an improved and accessible public transport offer all encompassed within new high quality public realm.</i></p>
<p>4.10.2</p>	<p>We welcome the discussion here about the meaning of ‘comprehensive development’. However, we feel that the definition could benefit from further clarity. We suggest the following wording:</p> <p><i>In general planning and regeneration terms, comprehensive development reflects an area that is refers to planned to ensure the development of strategic sites which is undertaken in a coordinated way, with the goal of improving and regenerating the area as a whole. It is usually applied to large and/or complex developments which are delivered over many years and which require land to be assembled to enable the</i></p>



	<i>development to be delivered, either by the Public Sector, other agencies <u>and/or</u> Developers.</i>
4.10.3	<p>This paragraph gives the impression that the three parts of the Brent Cross Growth Area are each within a single ownership, and will come forward in three discrete parts. The situation is more complex and we suggest that this paragraph should be amended as follows to ensure accuracy:</p> <p><i>The regeneration of the Brent Cross Growth Area is being delivered in three <u>principal</u> parts: Brent Cross North, Brent Cross Town, and Brent Cross West (Thameslink). These three areas are in <u>multiple</u> land ownerships and are being delivered separately by the Council and different development partners.</i></p> <p>Please also note that Brent Cross West (Thameslink) as referred to within this paragraph lies partly within a different Growth Area as designated in the Plan (Brent Cross West).</p>
4.10.4	<p>This should be amended as follows in the interests of consistency:</p> <p><i>Brent Cross North and South Brent Cross Town within the Brent Cross Growth Areas are as shown in Map 3. Brent Cross West is illustrated by Map 3A.</i></p>
Map 3	<p>The heading to the map key should be ‘Brent Cross Growth Area’, and Brent Cross Town is still labelled as ‘Brent Cross South’. The map key should be amended for clarity.</p>
4.12.1	<p>We suggest that this paragraph is amended as follows:</p> <p><i>The area south of the North Circular Road is being developed through a Joint Venture Partnership between the Council and Argent Related (BXS LP). Brent Cross Town comprises 72 hectares and will deliver <u>over</u> 6,700 new homes comprising a mix of types and tenures (<u>including Build to Rent</u>), with a new high street and public squares at the centre of the development providing a mix of shops and restaurants set within a series of attractive public spaces. This new <u>mixed use neighbourhood residential quarter</u> quarter will be supported by new and improved schools, community, health and leisure facilities, as well as improved parks and open spaces.</i></p>
4.12.2	<p>We suggest that this paragraph is amended as follows:</p> <p><i>Outline consent is also in place for 395,000 m2 of office space to create a new commercial quarter around the new Thameslink Station at Brent Cross West, as well as small business spaces adjacent to the new high street to support business start-ups.</i></p>
4.12.4	<p>Detailed consent is now in place for six plots. It is therefore suggested that this paragraph is amended to refer to ‘<u>over five development plots.</u>’</p>



4.14.6	As above, detailed consent is now in place for six plots. It is therefore suggested that this paragraph is amended to refer to ' <u>over five development plots.</u> '
4.15.1	<p>We support the recognition that the outline permission needs to be supplemented by further applications, but are concerned at the unintended implication or inference that the consent is now out of date. We suggest that the second half of this paragraph is amended as follows:</p> <p><i>The existing outline planning permission <u>was</u> originally approved in 2010, is now nearly a decade old and whilst it has flexibility to allow the phasing and delivery sequence of the development to be adjusted, it is expected that it will need to be supplemented through further planning applications to update areas of the masterplan as it is evolved and as the development responds to updated market and policy shifts.</i></p> <p><i>The existing outline planning permission <u>was</u> originally approved in 2010 and subsequently amended and updated in 2014. , is now nearly a decade old and Development pursuant to the outline planning permission will be supported and whilst it has flexibility to allow the phasing and delivery sequence of the development to be adjusted, it is also expected that it will need to be supplemented through further planning applications to update areas of the masterplan as it is evolved and as the development responds to updated market and policy shifts. <u>Any new planning applications will need to demonstrate their relationship with the outline planning permission, including not undermining comprehensive development of the Growth Area.</u></i></p>
GSS02	<p>As per our points in 1) above, it is suggested that the policy is amended as follows:</p> <p><i>The Council supports comprehensive regeneration of Brent Cross Growth Area to deliver a new Metropolitan Town Centre providing a range of uses including new homes, a new commercial office quarter <u>employment uses</u>, an expanded retail offer, destination leisure and entertainment, cultural and arts facilities, restaurants and hotels supported by an extensive programme of infrastructure investment over the Plan period. <u>Opportunities for optimising land and increasing site capacity across the Brent Cross Growth Area will be supported.</u></i></p> <p><i>Development proposals within the Growth Area must <u>should, insofar as is relevant to the proposal:</u></i></p> <ul style="list-style-type: none"> • <i>Demonstrate how they assist in achieving and not undermining comprehensive development of the area;</i> • <i>Contribute towards the creation of a Metropolitan Town Centre;</i> • <i>Support the provision of a minimum of 9,500 new homes including a mix of tenures and types of housing, <u>including Build to Rent homes;</u></i> • <i>Protect and where possible improve the amenities of existing and new residents;</i> • <i>Create a high quality, safe and attractive environment accessible to all;</i>



- Create an integrated network based on the Healthy Streets approach of pedestrian and cycle routes through high quality public realm and open spaces to meet leisure, access, urban design and ecological needs;
- Provide sufficient community infrastructure, including new and expanded schools and primary healthcare capacity;
- Ensure the restoration and enhancement of the River Brent and its corridor to provide both public amenity and biodiversity benefits to the area and to fully connect to the Welsh Harp (Brent Reservoir) and West Hendon Playing Fields.

The Brent Cross Growth Area will ~~also~~ deliver a new waste management facility to replace the existing Hendon Waste Transfer Station operated on behalf of the North London Waste Authority.

Meanwhile uses will be permitted where it can be demonstrated that they support the comprehensive development of the area.

The Brent Cross Growth Area is an area considered suitable for the development of tall buildings, in accordance with Policy CDH04.

.....

A New commercial ~~quarter~~ uses focussed around the new Brent Cross West rail station will provide 395,000m² of office development for over 20,000 new jobs. ~~This~~ Brent Cross Town will deliver the largest area of new space for economic growth in Barnet. There will also be support for creation of spaces for small and start-up businesses.

.....

Transport Improvements

~~Development proposals will need to bring forward the following~~ The following transport improvements will be brought forward within the Brent Cross Growth Area through detailed design, planning conditions and/ or Section 106 agreements:

- ~~Prioritise~~ Pedestrian and cycle routes throughout the new development and improvements to pedestrian and cycle connections and routes beyond the development area;
- ~~Ensure~~ Good access for disabled persons throughout the area with step-free access at Brent Cross Underground and Brent Cross West stations;
- A new rail station (Brent Cross West) on Thameslink line supported by a public transport interchange;
- A new bus station north of the North Circular Road as part of the expansion of Brent Cross Shopping Centre, with associated improvements to the local bus infrastructure;
- Connections and/or improvements to the strategic road network, that are supported by Transport for London in relation to the TLRN (TfL Road Network), and Highways England in relation to the M1 motorway, based on up to date mode share targets;
- Appropriate new and multi-modal transport links to and within the development including at least one link across the North Circular Road and at least one crossing over the railway to the Edgware Road;



	<ul style="list-style-type: none"> • <i>Improved pedestrian access across the A41 Hendon Way to link with Brent Cross Underground Station; and,</i> • <i>A new rail freight facility to replace the existing Strategic Rail Freight Site.</i> <p>.....</p> <p>Progress of Brent Cross</p> <p><i>The Local Plan will establish a series of indicators to monitor progress on Brent Cross Growth Area...</i></p>
4.16.4	<p>This should be amended as follows in the interests of clarity:</p> <p><i>There is much potential for a beneficial interrelationship between Brent Cross West and the wider Brent Cross Growth Areas, and opportunities for connectivity between the two should be maximised.</i></p>
4.28.3	<p>Sub-paragraph e) should read as follows:</p> <p><i>e) work as part of the regeneration of Brent Cross <u>Growth Area</u> (including improvements to Clitterhouse Playing Fields)...</i></p>
Chapter 5 – Housing	
5.2.4	<p>This paragraph refers to First Homes, however the Housing section provides no further clarity on the Council’s position in respect of discount levels and affordability. We suggest further detail is provided as to how the Council intends to implement the Government’s First Homes initiative.</p>
5.4.7	<p>This paragraph notes that assessments should be undertaken in line with the Mayor’s Affordable Housing and Viability SPG. The determining authoritative source in relation to planning viability matters remains Central Government Planning Practice Guidance (PPG), with the guidance provided by the Mayor supplementary to this. Suggested amendments as follows:</p> <p><i>Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be undertaken in line with <u>the NPPF, the Planning Practice Guidance, and the Mayor’s Affordable Housing and Viability SPG.</u></i></p>
HOU01	<p>Part a) refers to the 60% Low Cost Rent component including ‘Affordable Rent’. However, paragraph 5.5.11 then refers to Affordable Rent as a form of intermediate housing. We request that this is clarified.</p> <p>Affordable Rent is a distinct low-cost rental product, as noted by the NPPF at Annex 2, however at paragraph 5.4.3 it appears to be used as an umbrella term for homes let at social rent and London Affordable Rents. We suggest the umbrella term adopted is aligned to the policy wording and uses ‘Low Cost Rent’, but which at paragraph 5.4.3 also includes reference to the Affordable Rent product.</p>



<p>5.5.7</p>	<p>This paragraph refers to one-bed units being the ‘<i>least flexible forms of accommodation</i>’, however there should be some recognition that they are suitable for specific types of accommodation such as BtR. We suggest this paragraph is amended as follows:</p> <p><i>New one bed homes that meet London Plan space standards contribute to addressing needs in numerical terms; however, they are amongst the least flexible forms of accommodation in allowing for changes to individual housing needs and circumstances over time. <u>Notwithstanding this, well-planned single person dwellings have an important role to play in reducing dependence on HMOs and attracting those wanting to downsize from their existing homes, and are appropriate for Build to Rent schemes, where demand for new rental stock is much greater for one bedroom dwellings than in the owner-occupier or social/affordable rented sectors.</u></i></p>
<p>HOU02</p>	<p>As noted above, this policy does not provide the flexibility required to deliver BtR development, which requires a bespoke approach. It is important that Policy HOU02 makes it clear that the appropriate mix on individual sites will be considered on a case by case basis having regard to housing typology, local need and wider delivery patterns. We suggest the policy is amended as follows:</p> <p><i>Barnet dwelling size priorities are:</i></p> <p><i>a) For market homes for sale and rent – 3 bedroom (4 to 6 bedspaces) properties are the highest priority, homes with 2 (3 to 4 bedspaces) or 4 bedrooms (5 to 8 bedspaces) are a medium priority. <u>1 bedroom (1 to 2 bedspaces) properties are a lower priority but may be appropriate where justified in relation to the criteria in parts c) to g) of this policy.</u></i></p> <p>.....</p> <p><i>In applying the preferred housing mix the Council will consider the following criteria:</i></p> <p><i>c) Site size, surrounding context (including town centre location), PTAL and character.</i> <i>d) Mix of uses.</i> <i>e) Range of tenures.</i> <i>f) <u>Any special characteristics applying to specific types of tenure (for example Build to Rent development).</u></i> <i>f) g) Potential for custom-build and community led schemes.</i></p> <p><i>Innovative housing products that meet the requirements of this Policy will be supported.</i></p>
<p>5.17.2</p>	<p>This paragraph refers to a Build to Rent scheme being supported, however there appears to be no justification for why this is expressed in the singular. It is suggested that this paragraph is amended, as follows:</p> <p><i>As part of the Council’s plans for <u>the Brent Cross Growth Area</u> delivery of a <u>Build to Rent scheme development</u> is supported (see Policy GSS02). Opportunities for Build to Rent, on specific sites with large capacities, have been identified in the Schedule of Proposals (Annex 1).</i></p>



	<p>Clarity is also required in relation to the Discount Market Rent levels required as part of the Council’s BtR policies. Our suggested wording is as follows, to align the Plan with the London Plan Policy H11:</p> <p><i>The Council will require contributions from Build to Rent proposals to affordable housing in accordance with London Plan Policy H11. This should be in the form of Discounted Market Rent units, delivered at a genuinely affordable rent level. <u>with at least 30% provided at London Living Rent levels and the remaining 70% at a range of affordable rents. Rents for the remaining 70% should have regard to the relationship between the level of discount required and local affordability, as well as the viability of achieving the 35% policy target.</u></i></p>
<p>Chapter 6 – Character, Design and Heritage</p>	
<p>6.6.1</p>	<p>This paragraph implies that Secured by Design Standards will be applied stringently to all schemes. In line with the London Plan, the level of compliance with Secured by Design should be considered proportionately and on a case-by-case basis. It is suggested that this paragraph is amended as follows:</p> <p><i>Measures to design out crime should be integral to development proposals, <u>having regard to Secured by Design guidance.</u> Where appropriate, the Council will ensure through conditions on planning consents that Secured by Design is applied.</i></p>
<p>CDH01</p>	<p>As per the above, this policy should be amended as follows:</p> <p><i>The Council will expect development proposals to:</i></p> <p>.....</p> <p><i>v. Adopt <u>Demonstrate how Secured by Design principles have been incorporated into the development to create safe and secure environments that reduce opportunities for crime and help minimise the fear of crime.</u></i></p>
<p>6.18.2</p>	<p>This should be amended as follows in the interests of clarity:</p> <p><i>Tall buildings that are of exemplary architectural quality can make a positive contribution to Barnet and become a valued part of the identity of places Growth Areas such as Brent Cross, and Colindale, as well as Growth Areas and Town Centres such as Cricklewood <u>and</u> Edgware, as well as town centres such as Finchley Central and North Finchley and along historic routes such as the Edgware Road (A5) and the Great North Road (A1000).</i></p>
<p>CDH04</p>	<p>We welcome the fact that Brent Cross is recognised as a location for tall buildings but consider that greater clarity is required in the wording of the policy. ‘Appropriate siting’ is not clearly defined; it is assumed that this means compliance with the criteria listed in Part (e), in which case the words ‘appropriate siting’ are not required. We also query whether location within an OA or Growth Area would alone be sufficient to demonstrate ‘exceptional circumstances.’ The word ‘Opportunity’ after the name of each Growth Area is not required.</p>



Chapter 7 – Town Centres	
General comment	<p>The Draft Local Plan acknowledges the impact of COVID-19 on town centres and the shift from retail to other formats, but is not explicit about the fact that many restaurants and food businesses have pivoted towards a more production-led/takeaway model. Whilst restaurants are likely to return to normal trading as COVID-19 recedes, it is likely that some will retain a production and delivery operation model alongside dine-in, which in turn means that delivery companies such as Deliveroo and Uber Eats are also likely to play a role in the future of our high streets. It is considered that the Plan should consider how public realm and building design could be adapted and implemented to facilitate these new models.</p> <p>The Plan refers to culture and tourism as a part of night-time economy, but is generally very light on culture. The Plan should also refer to the Mayor’s Rescue Plan for Live Music Venues and express support for such uses in suitable locations, given their decline across London.</p>
Table 13	<p>The new town centre will be both north and south of the A406 (Brent Cross North and Brent Cross Town), and this should be noted in Table 13. We also suggest that the reference to ‘Brent Cross Shopping Centre’ in the top row of the table is amended to ‘Brent Cross’.</p>
7.5.1	<p>As per the above, this paragraph should be amended as follows:</p> <p><i>Outline planning permission was granted in 2010 for the comprehensive redevelopment of the whole of the Brent Cross Growth Area to create a new mixed use town centre <u>at Brent Cross North and Brent Cross Town</u>, with 56,600m² of comparison retail floorspace; <u>approximately 7,500 new homes, including affordable ones, and 395,000m² of new office space</u> new commercial quarter with a forecast of over 20,000 new jobs.</i></p>
TOW01	<p>The reference to Brent Cross in Part (a) should be Brent Cross Growth Area; it is considered the policy should be amended as follows:</p> <p><i>The Council will support an appropriate mix of uses within designated centres:</i></p> <p><i>i) <u>The redevelopment of Brent Cross Growth Area (see policy GSS02) to will provide a strong retail offer as well as a wider mix of uses including leisure, office and other commercial, community and cultural uses to create a new Metropolitan Town Centre for North London.</u></i></p>
Chapter 8 – Community Uses and Promotion of Health and Wellbeing	
8.2.2	<p>Given their high transport accessibility, Growth Areas are also suitable locations for community uses. It is therefore suggested that ‘Growth Areas’ should be added to the list of locations where community uses will be encouraged, as follows:</p> <p><i>The Council’s approach is to encourage new community uses to be located in <u>Growth Areas, town centres and local centres as these locations tend to be more accessible</u></i></p>



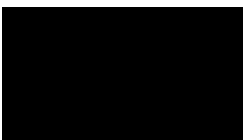
	<i>by public transport, in particular the bus network.</i>
CHW01	<p>As above, Part C should be amended as follows:</p> <p><i>The Council will:</i></p> <p>.....</p> <p><i>c) support, subject to satisfactory management arrangements, the provision of multi-purpose community hubs that can provide a range of community services, particularly within town centres. Provision outside town centres <u>and Growth Areas</u> will need robust justification;</i></p>
CHW03	<p>As per comments on Policy CDH01, this policy should be amended as follows:</p> <p><i>The Council will:</i></p> <p>.....</p> <p><i>b. <u>as far as is practicable</u>, require development proposals to reflect ‘Secured By Design’ (see Policy CDH01) and work with the Metropolitan Police’s Secured by Design Officers;</i></p>
Chapter 9 – Economy	
9.6.1	<p>This should be amended as follows in the interests of clarity and consistency:</p> <p><i>The <u>proposals for the Brent Cross Growth Area proposals</u> will create a significant employment location in the Borough which is anticipated to have a positive impact on the demand for office space in the Borough.</i></p>
9.9.1	<p>As outlined above, it is considered that Brent Cross Growth Area could be a location for well-planned logistics and distribution uses. It is therefore suggested that this paragraph is amended as follows:</p> <p><i>Barnet’s designated LSIS, are the focus for development of light industrial, Class B2 (general industry) Class B8 (storage and distribution) and employment generating sui generis uses. Brent Cross, Edgware, the District Town Centres and potentially New Southgate in the latter stage of the Local Plan are the focus for accommodating office development and light industrial uses appropriate for town centres, <u>with other employment uses being considered where it can be shown that they are able to operate without negatively impacting upon other uses.</u></i></p>
ECY01	<p>The reference to Brent Cross in Part b) of this policy should be Brent Cross Growth Area. In addition, and having regard to comments above in relation to the provision of industrial uses at Brent Cross, this policy should be amended as follows:</p> <p><i>j) Supporting New employment space <u>will be supported</u> outside of the locations outlined in (a), (b) and (c) if the following criteria are met:</i></p> <p>.....</p> <p><i>iv. The site is not allocated <u>in Annex 1 of this Plan (Schedule of Site Proposals)</u> for an alternative use including residential, education or community uses.</i></p>



9.10.5	The qualifying comment beneath Table 15 should be amended to remove reference to 'positive' indexation. BCIS costs go both up and down and if the formula rates are to track BCIS costs, then they should track absolutely.
ECY02	<p>If it is intended that this policy applies to the whole OA (as opposed to the Brent Cross Growth Area, part a) should be re-phrased to refer to the 'Brent Cross/Cricklewood Opportunity Area'.</p> <p>The policy does not set out the level of discount to market rents that the Plan expects the 10% of gross floorspace to be let at by the developer. This should be clarified.</p> <p>Reference should be made that the provision of the Council's affordable workspace policies are subject to viability.</p> <p>The policy is silent on the extent of fitting out obligations on the developer, which should be limited to Cat A fit out. This should be clarified within the policy or supporting text.</p>
Chapter 12 – Infrastructure	
Table 24	<p>It is suggested that the heading 'Brent Cross and Brent Cross West' is amended to 'Brent Cross Growth Area and Brent Cross West Growth Area.' As per comments above, we query the indicative housing numbers for the Brent Cross Growth Area.</p> <p>As highlighted within the representations from Steer appended to this letter, there is a need for better transport monitoring. The plan period is to 2036 and the monitoring indicators for transport relate solely to parking (relevant only to TRC03), with nothing on public transport capacity or active travel. In order to justify the growth being proposed by the Local Plan and ensure that the public transport infrastructure is effective, additional monitoring should be captured as part of the indicators within Table 24.</p>

We would welcome the opportunity to discuss these representations further and request that we are kept informed on the progress of the Plan. In particular, we would like to be notified of the submission of the Local Plan for independent examination.

Yours faithfully



DP9 Ltd.

Representations to the Barnet Draft Local Plan Regulation 19 Consultation and LBB Local Plan Evidence Base – Strategic Transport Assessment 2021, Car Parking Study 2019 and Car Parking Review 2021 on behalf of Brent Cross South Limited Partnership (BXS LP)

Barnet Local Plan Draft Local Plan (Reg 19) 2021 to 2036 (June 2021)

Policy / Text	Representations and/or Proposed Amendments
<p>Para 11.2.2</p>	<p>The COVID-19 pandemic has had a significant impact on how people travel, particularly for daily movements such as commuting to work. The pandemic and corresponding restrictions have brought forward changes to travel patterns and attitudes to home working which are likely to be long lasting.</p> <p>The implications of people working more from home may result in lower car usage, for instance for commuting, and the benefit of owning a car could be increasingly outweighed by its financial costs. There has also been a shift towards more active travel to avoid busy and confined public transport systems. It is too early to determine the true and long-lasting effect on Barnet’s local transport network, however given the huge global impact COVID-19 has had on travel, a review mechanism and monitoring must be completed as part of the BLTTS which currently plans infrastructure improvement to 2041 as well as completing regular updates of the Strategic Transport Assessment. It is of paramount importance that infrastructure improvements are targeted in the right place following what could be a significant and long-term change to people’s travel habits.</p> <p>This approach would ensure that Barnet’s policies and strategies do not become ineffective and obsolete as a result of any long-lasting shift in the way people travel.</p>
<p>Policy TRC01 – Sustainable and Active Transport</p>	<p>We support the broad aim of Policy TRC01 to “deliver a more sustainable transport network ... by reducing car dependency, encouraging sustainable modes of transport and improving air quality”. However, the following representations are made:</p> <p>TRC01 a) iii) ensures developments seek “opportunities for improvements to the wider walking and cycling environment”, however this must only be applied when there is clear requirement which passes the three S106 tests:</p>

	<ul style="list-style-type: none"> a. necessary to make the development acceptable in planning terms b. directly related to the development; and c. fairly and reasonably related in scale and kind to the development. <p>TRC01 b) i) advocates support for delivery of new transport infrastructure identified in Policy TRC02 and the BLTTS. However, Policy TRC02 predominantly focuses on public transport infrastructure delivery and does not clearly set out measures that will be taken to promote walking and cycling within the Borough. This is considered a missed opportunity to promote two modes critical to achieving LBB’s modal shift objectives and policy objectives relating to air quality and public health.</p> <p>TRC01 b) iii) does not make reference to Mayor’s Vision Zero agenda and should be amended as follows: “Support the Healthy Streets Approach, improving street lighting, security coverage and accessibility along new walking and cycling routes, transport interchanges and around bus stops as well as delivering, where resources permit and in appropriate locations, targeted local safety schemes to include speed reduction initiatives to support the Mayor’s Vision Zero commitment; and”</p> <p>TRC01 b) iv) stipulates that the Council will “promote orbital travel improvements where appropriate”; however, Policy TRC01 does not reference these improvements, and it is not clear what steps will be taken to address this identified issue and further clarity on what constitutes “appropriate” should be set out in this policy.</p> <p>TRC01 c) iii) A Car Parking Design and Management Plan should also be included here as a supporting document submitted for all applications with car parking as mentioned in Para 11.12.8.</p>
Para 11.11.4	<p>The paragraph states that “The Brent Cross Growth Area will benefit from new and enhanced bus services including...rapid and orbital bus routes.” The specific routing for the rapid transit service has yet to be determined or agreed and there is no funding strategy to deliver it. This should be appropriately and accurately referenced in this paragraph.</p>

	<p>This paragraph focuses on the public transport interventions associated with the Brent Cross Growth Area; however this area is not just a transitional space or destination or one which would be accessed solely by public transport. People will live and work in this Growth Area and priority must be placed on active travel improvements and integrated infrastructure to support walking and cycling as primary sustainable travel modes.</p>
Para 11.11.7	<p>We support the increased provision of the electric vehicle charging points across new developments in line with London Plan Policy T6, however LBB should also require new developments to provide both active and passive charging for on-street visitor spaces.</p>
Policy TRC02 – Transport Infrastructure	<p>One of the key objectives of the Local Plan is to improve sustainable travel options including walking and cycling. However, the new infrastructure set out within Policy TRC02 is focused primarily on public transport delivery and does not clearly set out measures that will be taken to promote walking and cycling within the Borough. A list of key projects to enhance walking and cycling should be included as part of Policy TRC02.</p>
Para 11.12.2	<p>We support the flexibility to apply local residential parking standards based on local circumstances with a presumption to restrain residential parking through careful car parking management.</p>
Para 11.12.3	<p>This paragraph should be amended as Local Plan Table 23 and the Car Parking Standards Report 2021 states that only sites with PTAL 5 would be required to determine and consider Orbital PTAL in relation to car parking provision.</p> <p>This approach of considering a site’s Orbital PTAL is intended to improve orbital bus services within Barnet. It is stated that sites below a certain Orbital PTAL threshold would be required to make financial contributions to TfL to improve orbital bus services. It is questionable as to whether LBB is able to influence TfL allocation of such contributions towards orbital bus services, nor whether TfL would consider such an approach to be a priority for the bus network. This is particularly relevant given TfL’s significant concern in use of the Orbital PTAL methodology as per TfL’s Regulation 18 representations.</p>

Para 11.12.4	The London Plan does not offer parking standards for all land uses. LBB must offer guidance on the parking standard for these uses or determine how standards should be assessed as part of Transport Assessments.
Para 11.12.5	We support the need for CPZs where parking pressure is identified in residential areas, as well as restrictions on new occupiers obtaining parking permits through legal mechanisms.
Para 11.12.6	<p>We support the acknowledgement that some developments may have difficulty meeting parking requirements and that flexibility will be adopted where public transport and active travel is available.</p> <p>LBB should also make reference to larger scale development in growth areas such as Brent Cross, where phasing of the development means that parking ratios need to be adopted flexibility to deliver early stages of development or across areas with differing levels of accessibility. An overall parking ratio for large masterplans should be adhered to, but with the opportunity to implement different parking requirements across areas of the Site.</p>
Para 11.12.8	<p>The Car Parking Design and Management Plan should be included as a supporting document at TRC01 c) iii).</p> <p>It should also be noted that TfL has not yet published its guidance on Car Parking Design and Management Plan.</p>
Para 11.12.9	It is mentioned that the delivery of car clubs and pool cars as a sustainable alternative can reduce levels of car parking provision. However, the implementation of dedicated off-street car clubs or pool car schemes within developments are costly to operate and maintain and often have limited take-up from residents/employees. The location of the development in terms of PTAL, the proposed car parking provision and the availability of existing on-street commercial car clubs in the vicinity of the development should also be a consideration when assessing the sustainability of new developments. We consider the wording should be amended to also include appropriate allocation of on-street car club spaces, as these are likely to be more viable than on-site spaces.

	<p>Whilst we support the provision free membership for car clubs to incentivise their use, careful management and allocation of such incentives to ensure that the benefit remains for the actual household rather than the residents who may move away from the area (e.g. students and short-term renters).</p>
Para 11.12.10	<p>References to ‘bicycles’ should be amended to ‘cycles’ to reflect that not all cycles have two wheels.</p> <p>The London Plan cycle parking standards impose a very significant space requirement on developments. A more flexible approach to cycle parking would be appropriate whereby lower levels could be provided initially with more spaces provided in accordance with demand as monitored through the Travel Plans. Short-stay cycle parking can have a detrimental effect on public realm and should be viewed holistically with non-residential land uses sharing the overall provision flexibility to avoid excessive amounts of on-street cycle parking. This is particularly relevant in town centre locations where linked trips allow for reasonable reductions in short-stay cycle parking.</p>
Table 23 - Residential Parking Standards	<ul style="list-style-type: none"> • Symbol ^ can be omitted. • Footnote for # should clarify what “higher density or in more accessible locations” means to avoid ambiguity. • Footnote “~With the exception of disabled persons parking, see London Plan Part G Policy T6 .1 Residential parking.” This should reference that this relates to the London Plan.
Policy TRC03 – Parking Management	<p>Policy TRC03 states that “The Council will expect development to provide parking in accordance with the London Plan standards (Policy T6. Car Parking and Policies T6.2- T6.5.), except in the case of residential development.”</p> <p>The London Plan does not offer parking standards for all land uses. LBB must offer guidance on the parking standard for all uses or determine how standards should be assessed as part of Transport Assessments. This should be addressed in this policy and is linked to Para 11.12.4.</p> <p>The London Plan maximum standards for retail uses (London Plan Table 10.5) do not consider that customer car parking is essential for the viability of large format food</p>

retail uses where customers are collecting large and bulky items. Large foodstores can also form key anchors within town centres and this policy could inhibit the redevelopment of such uses which play an important role and function in attracting people to town centres. It should be made clear in Policy TRC03 that London Plan Policy T6.3 Part G does allow for flexibility in applying the retail car parking standards when they could adversely affect a town centre's vitality and viability.

The London Plan maximum standard for office uses at outer London Opportunity Areas is 1 space per 600 sqm GIA, however the Section 73 maximum standard for BX Town is 1 space per 300 sqm GIA. Whilst the maximum standard at BX Town is more generous than is prescribed by the London Plan, BXS LP is still experiencing difficulties with prospective office occupiers requiring much greater levels of car parking at around 1 space per 166 sqm GIA. This highlights the clear disparity between office occupier requirements for car parking and the difficulties in attracting 'statement' occupiers to outer London locations which are not yet established neighbourhoods or town centres. Flexibility and the need to provide adequate office parking to ensure the vitality and viability of town centres should be incorporated into the Local Plan.

Furthermore, the London Plan does not provide sufficient clarity on appropriate car parking for leisure uses, outdoor amenities such as parks and sports pitches, or event requirements. These limitations of the London Plan policies should be noted in Policy TRC03 and LBB must offer guidance to developers on appropriate car parking provision for such uses.

We consider the wording of Policy TRC03 a) should be amended as follows:

"The Council will expect residential development to provide parking flexibly and in accordance with Table 23." See responses above to Para 11.12.2 and Para 11.12.6

As regards Policy TRC03 b), we consider that, where CPZs are deemed necessary to mitigate a development, it is not reasonable to allow for the CPZ to be implemented prior to occupation. Given that CPZs are subject to time-consuming, and possibly unsuccessful, public consultation exercises; the approach set out would significantly fetter the commencement of construction for developments under such restrictions. Developers are unlikely to commence construction of an approved development at risk

	<p>pending successful implementation of a CPZ. Furthermore, such policy would significantly conflict with London Plan Policy T6 Part C which states that “An absence of local on-street parking controls should not be a barrier to new development” – Policy TRC03 b) would be a significant barrier to new development.</p> <p>We consider the wording of Policy TRC03 b) should be amended as follows: “A developer contribution towards the implementation and monitoring of new or amended CPZs will be agreed as part of the planning permission for developments which could generate overspill car parking on local streets.”</p> <p>We consider the wording of Policy TRC03 d) should be amended as follows: “Where development proposals involve a reduction of existing off-street car parking spaces, the developer must demonstrate that sufficient parking will remain in the area to serve local needs or agree to a developer contribution towards the implementation and monitoring of a new or amended CPZ”.</p> <p>Policy TRC03 e) “Cycle parking is to be delivered in accordance with London Plan Standards set out in Policy T5 Cycling.” The London Plan cycle parking standards impose a very significant space requirement on developments. A more flexible approach to cycle parking would be appropriate whereby lower levels could be provided initially with more spaces provided in accordance with demand as monitored through the Travel Plans. Short-stay cycle parking should be viewed holistically with non-residential land uses sharing the overall provision flexibility to avoid the public realm being detrimentally impacted by excessive amounts of on-street cycle parking. This should be addressed in this policy and is linked to Para 11.12.10.</p> <p>We consider the wording of Policy TRC03 g) should be amended as follows: “Spaces should be available for on-street car club vehicle parking along with car club membership for future residents of the development within the agreed car parking provision, taking into consideration existing car club provision within the vicinity of the development.” See response above to Para 11.12.9.</p>
Freight and Servicing	As stated previously in the representation made in the Reg 18 Draft Local Plan consultation, one of the key transport issues facing transport systems and new development is that of servicing and freight activity. Both the London Plan and Major’s

Transport Strategy place significant importance on managing freight and servicing. TfL's Freight & Servicing Action Plan (March 2019) identifies that around one fifth of road traffic in London comprises lorries and vans, with HGVs involved in 63% of fatal cyclist collision and 25% of fatal pedestrian collisions, despite only making up 4% of overall miles driven in the capital. It is considered that this is an important element not given suitable attention within the Draft Local Plan, with a range of measures possible for inclusion to promote more sustainable delivery options, particularly given the increasing role of online shopping for residents and businesses. Clarity is needed on the approach for freight and servicing on the highway network within the Borough and should be support through a specific policy.

Barnet Strategic Transport Assessment 2021

Policy / Text	Representations and/or Proposed Amendments
General comments.	<p>We support the principles of the Strategic Transport Assessment; however, there needs to be a monitoring and review mechanism to understand the mid- and long-term impacts of COVID-19 on travel behaviours and transport networks across Barnet.</p> <p>Furthermore, monitoring should establish the accuracy of the assumptions (e.g. around committed highway schemes) and assessments inherent within the Strategic Transport Assessment and the TfL strategic transport models that have been used. The monitoring must also allow Barnet to understand its progress towards targets identified in the Mayor’s Transport Strategy and Barnet’s LIP.</p> <p>This additional monitoring should be captured as part of further indicators within Table 24 of the Local Plan. This would ensure that the soundness tests, as set out in the NPPF, namely the effectiveness of the mitigation and measures identified within the Local Plan.</p>

Barnet Car Parking Study 2019

Policy / Text	Representations and/or Proposed Amendments
Section 4.2 “It is acknowledged that less than 1% of households actually apply for 4 parking permits, it is suggested that the current policy of issuing 4 permits per household to new residents in developments located in, or adjacent to, CPZ areas is reviewed.”	BXS LP supports the principle of Barnet’s review of its parking permit policies for households within CPZs.
Chapters 4 and 5	The data referenced in these chapters is relatively old and more recent datasets could provide a more current perspective on trends in car club use and online shopping.
Chapter 8	To reflect Policy T6, Part A of the London Plan, wording in this and subsequent chapters should be amended so that the analysis allows for future PTALs (as defined by TfL’s WebCAT or manual calculations) rather than current PTALs.
Chapters 10 and 11	<p>The text states that rail and underground services in LBB can all be categorised as radial routes, so only bus services need to be considered as part of Orbital PTAL calculations.</p> <p>Whilst it is stated at the bottom of page 23 that WLO would improve the Orbital PTAL for Highfield Avenue, Brent Cross; LBB should confirm what amendments would be required to the calculations when accounting for the WLO.</p>
Chapter 11 ‘Highfield Avenue, Brent Cross’ – “This will further enhance the radial PTAL to a score of 6”	This sentence should be amended as the paragraph above it states that the radial PTAL would already be a 6a for Highfield Avenue, even before the introduction of Brent Cross West rail station.

Application of Residential Parking Standards in the London Borough of Barnet – Phase 4 (Barnet Car Parking Review 2021)

Policy / Text	Representations and/or Proposed Amendments
page 8, “Whilst the public transport accessibility in these areas is poor”	This paragraph relates to locations with PTAL 2 to 3, which TfL’s guidance states are defined as ‘poor’ and ‘moderate’ respectively. Therefore, “poor” should be replaced with “poor to moderate” to reflect this.
page 8, under ‘PTAL 5’ section “Where Controlled Parking Zones (CPZs) are in place and orbital PTAL is calculated to be more than or equal to 4, we recommend the new London Plan is adopted by the LBB and developments should be car-free. However, where these criteria are not met the parking standards should be increased to 0.5 spaces per unit for car club schemes where suitable, to encourage movement around the borough, with developer contributions towards enhancing bus services to improve the orbital accessibility of the local area and extending Controlled Parking Zones.”	TfL has raised significant concerns with the Orbital PTAL methodology and it is queried whether financial contributions made by developers to TfL for improving orbital bus services would be allocated as such by TfL.
“However, where these criteria are not met the parking standards should be increased to 0.5 spaces per unit for car club schemes where suitable, to encourage movement around the borough”	<p>This sentence should be reviewed as the reference to car club schemes does not make sense.</p> <p>Car club schemes should be encouraged at all developments, regardless of PTAL, subject to discussions with car club operators as to the long-term viability of such schemes.</p>
“To enable orbital PTAL to be determined easily the Council recommends that a customer facing webbased calculation tool be devised. ”	<p>Should Orbital PTAL assessments be required by LBB, it is imperative that a consistent means of calculating a site’s Orbital PTAL is produced. This should be available free of charge and regularly updated by LBB to ensure it remains current and valid.</p> <p>An Orbital PTAL tool should already include the orbital distance calculations for each bus route, as per the methodology presented in Appendix A.</p> <p>This webbased calculation tool should account for future PTALs as per TfL’s WebCAT. It should also allow for manual calculations to ensure developers are able to account for potential new bus stops or services, pedestrian routes, etc. that would affect a site’s public transport accessibility. Furthermore, consideration must be given to incorporate the WLO scheme into Orbital PTAL calculations should this approach be progressed further.</p>

