



Barnet Draft Local Plan
Publication Stage Representations Form

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| 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.

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.

Policies: **Map 2 - Key Diagram.** Paragraph 3.4 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 <input type="checkbox"/> | No ✓ |
| 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.

| |
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| Please refer to enclosed letter of representation. |
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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.

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.

| |
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| Please refer to enclosed letter of representation and associated appendix. |
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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.

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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?

- 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.

To best represent our client's interests.

Declaration of consent

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Signature Nicola Sewell (WSP) Date 09 August 2021



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Policies: **BSS01**. 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.

- | | | |
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| a) Legally compliant | Yes ✓ | No <input type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No ✓ |
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Policies: **GSS01**. 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 <input type="checkbox"/> | No ✓ |
| c) Compliant with the Duty to Co-operate | Yes ✓ | No <input type="checkbox"/> |

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Policies: **GSS09**. 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 <input type="checkbox"/> | No ✓ |
| c) Compliant with the Duty to Co-operate | Yes ✓ | No <input type="checkbox"/> |

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Policies: **CDH04**. 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 <input type="checkbox"/> | No ✓ |
| c) Compliant with the Duty to Co-operate | Yes ✓ | No <input type="checkbox"/> |

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Policies: **ECY01**. 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 <input type="checkbox"/> | No ✓ |
| c) Compliant with the Duty to Co-operate | Yes ✓ | No <input type="checkbox"/> |

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Policies: **TOW01**. 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.

- | | | |
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| b) Sound | Yes <input type="checkbox"/> | No ✓ |
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Planning Policy Team
London Borough of Barnet
7th Floor
2 Bristol Avenue
Colindale
London
NW9 4EW

70087477
9 August 2021

Dear Sir/Madam,

**BARNET LONDON BOROUGH DRAFT LOCAL PLAN (REG 19) 2021 TO 2036
REPRESENTATIONS SUBMITTED ON BEHALF OF DTZ INVESTORS UK LTD IN RELATION
TO FRIERN BRIDGE RETAIL PARK, PEGASUS WAY, N11 3PW**

We write on behalf of DTZ Investors UK Ltd (herein “DTZ”) in response to the Barnet London Borough Draft Local Plan (Reg 19) 2021 to 2036 consultation. DTZ are appointed to manage Friern Bridge Retail Park on behalf of the owners, Strathclyde Pension Fund. These representations are submitted in respect of Friern Bridge Retail Park on Pegasus Way (herein “the Site”).

THE SITE

The Site is a well-established retail park of approximately 12 acres (4.8 hectares) in size, which has been operating since the early 1990s. The Site accommodates 12no units that provide approximately 16,500sqm (c178,000 sqft) of retail floorspace. Current operators include B&Q, Sports Direct, London Furniture, Halfords, Furniture Village, Carpetright, Pets at Home, Smyths Toys, Currys PC World and Dunelm, as well as McDonald’s, Subway and Costa Coffee. It is served by 600 car parking spaces and servicing access is provided to the rear of each unit.

The Site is located on the eastern boundary of Barnet, within the New Southgate Opportunity Area, as designated in the Draft Local Plan. The Site has direct access onto the A406 (North Circular) via Pegasus Way, making it very well connected to the surrounding road network.

It is well connected by public transport, with New Southgate station approximately 100m to the north and frequent bus services from bus stops located on the A406, approximately 100m to the south. It is also well connected for pedestrians, with footpaths leading into the site from an area of public open space to the west, and from the residential area to the north.

Figure 1 below indicates the approximate boundary of the site in red and the indicative location of the New Southgate Opportunity Area (herein “the NSOA”) in yellow.



Figure 1. Location of site and the NSOA

The owners intend to continue managing the Site as a successful retail destination. However, the retail sector is especially dynamic and needs to respond swiftly to the changing demands of consumers and the operational requirements of retailers. We anticipate various changes and developments will therefore be needed over the coming years to keep this destination vibrant and relevant to the requirements of modern city retailing.

Whilst an excellent retail destination, the site is large, well-located, highly accessible and therefore suitable for redevelopment for a number of alternative uses. In particular, it is likely to work well for distribution and logistics uses. The proximity to public transport would also make it suitable for high density residential use.

As such, these representations are submitted in respect of draft retail policies associated with the Site’s current use, but also highlighting the potential of the Site’s suitability for redevelopment for logistics or residential in the future.

The representations relate to the following draft policies:

- Map 2 – Key Diagram;
- Draft Policy BSS01: Spatial Strategy for Barnet;
- Draft Policy GSS01: Delivering Sustainable Growth;
- Draft Policy GSS09: Existing and Major New Transport Infrastructure;
- Draft Policy CDH04: Tall Buildings;
- Draft Policy TOW01: Vibrant Town Centres; and
- Draft Policy ECY01: A Vibrant Local Economy.

National and Regional Planning Policy

NATIONAL PLANNING POLICY FRAMEWORK (2021)

Chapter 3 of the National Planning Policy Framework (NPPF) relates to plan-making and paragraph 16 explains that plans should:

- “a) be prepared with the objective of contributing to the achievement of sustainable development;*
- b) be prepared positively, in a way that is aspirational but deliverable;*
- c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area...”*

Paragraph 35 explains that plans must be sound and prepared in accordance with legal and procedural requirements. Plans are ‘sound’ if they are:

- “a) Positively prepared...*
- b) Justified...*
- c) Effective...; and*
- d) Consistent with national policy...”*

Chapter 6 seeks to build a strong, competitive economy. Paragraph 81 states:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development...”

Chapter 11 seeks to make effective use of land and paragraph 19 requires planning policies to promote an effective use of land in meeting the need for homes and other uses. Furthermore, paragraph 120(c) requires planning policies to:

“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs...”

THE LONDON PLAN (2021)

The London Plan is the overall strategic plan for London. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

The London Plan forms part of the development plan and there is no requirement for the policies to be repeated at the local level. However, in some instances a local approach is required within the context of the overall policy. Local Plans must comply with the London Plan.

REPRESENTATIONS

Draft Policy BSS01: Spatial Strategy for Barnet

Draft Policy BSS01 sets out the spatial strategy for Barnet. It clarifies the number of homes that the Council seeks to deliver up to 2036, as well as the quantum of new office space, a new regional park and three new destinations for sport and recreation. The policy also states that the Council will seek to minimise the Borough's contribution to climate change and that, in order to better manage the impacts of development on the climate, growth will be concentrated in the identified Opportunity Areas, together with Barnet's Growth Areas and District Town Centres. It states that outside of these locations, growth will be supported in places where there is recognised capacity and where the historic environment and local character can be conserved or enhanced as a result.

The supporting text for draft Policy BSS01 explains that the Growth Areas have a supply of brownfield and underused land and buildings that offer opportunities for inward investment, and that they provide identified developable and deliverable sites with substantial capacity for new homes, jobs and infrastructure.

Analysis

DTZ supports the principle of prioritising Opportunity Areas, including NSOA, for growth. DTZ also supports the underlying principle of redeveloping brownfield sites and underused buildings and the draft Local Plan acknowledges that Growth Areas are identified as having a supply of such sites that offer development opportunities. However, we recommend that the wording of this policy is strengthened to further highlight and encourage the redevelopment of brownfield sites. Chapter 11 of the NPPF seeks to make effective use of land and paragraph 119 clarifies that this should be for other uses as well as housing.

Summary and proposed wording

As currently worded, this policy is not effective or entirely consistent with national policy, as it fails to establish that previously developed land should be prioritised, and therefore it does not promote the most effective use of land.

We therefore propose that the wording of draft policy BSS01 is amended to specifically include undesignated brownfield sites as part of the Council's spatial strategy, as set out below:

“a) In order to make the Council's vision for Barnet happen, the Local Plan seeks to deliver between 2021 and 2036:

- i. A minimum of 35,460 new homes, including the provision of affordable housing to meet Policy HOU01;*
- ii. 395,000m² of new office space at Brent Cross Town and 56,600 m² of new retail space at Brent Cross North;*
- iii. Up to 67,000 m² of additional office space across Barnet's town centres, including the provision of affordable workspace to meet Policy ECY02;*
- iv. a new Regional Park within designated Green Belt or Metropolitan Open Land as set out in Policy GSS13; and*
- v. 3 new destination hubs for sport and recreation at: Barnet and King George V*

Playing Fields; Copthall Playing Fields and Sunny Hill Park; and West Hendon Playing Fields as set out in Policy GSS13.

b) The Council will seek to minimise the Borough's contribution to climate change in accordance with Policy ECCO1.

*c) In order to better manage the impacts of development on the climate, growth will be concentrated in accordance with the Local Plan's suite of strategic policies GSS01 to GSS13 in the Opportunity Areas of Brent Cross Cricklewood, Colindale and New Southgate, together with Barnet's Growth Areas, ~~and~~ District Town Centres, **and previously developed sites**. These are the most sustainable locations with good public transport connections and active travel provision. Outside of these locations, growth will be supported in places where there is recognised capacity and where the historic environment and local character can be conserved or enhanced as a result.*

d) The Social, Green and Physical Infrastructure and funding, particularly through the Community Infrastructure Levy, to support this growth is subject to constant review through the Infrastructure Delivery Plan."

Map 2 – Key Diagram

The Key Diagram illustrates the Council's overall spatial strategy. This shows the broad locations where the Council expects a concentration of development to be located. The Key Diagram includes the Opportunity Areas that are designated within the London Plan, as the capital's principal opportunities for accommodating large scale development. The draft Local Plan states that the Opportunity Areas have the highest expectations for delivering new homes and new jobs as well as supporting infrastructure.

Analysis

The NSOA is shown indicatively on the Key Diagram and it includes the Site. DTZ is supportive of the inclusion of the Site within the NSOA, as it is an excellent example of a brownfield site that is suitable for redevelopment for alternative uses, as well as an appropriate location for tall buildings (as discussed in the representations to Draft Policies CDH04 and GSS01). However, as currently shown, the boundaries of the NSOA are unclear. In order to provide certainty for developers, the boundary should be clearly defined through the preparation of the Local Plan.

Summary

At present, the Key Diagram does not sufficiently define the boundaries of the NSOA. It is therefore not effective and should be amended in order to be sound.

Draft Policy GSS01: Delivering Sustainable Growth

Draft Policy GSS01 sets out the hierarchy for the distribution and location of housing, which includes Growth Areas, District Town Centres, existing and major new public transport infrastructure (including the NSOA), estate renewal and infill, major thoroughfares and "other large sites including land at Middlesex University in Hendon and car parks". The policy also states that

housing growth will come forward on “small sites” (defined at paragraph 4.8.4 as being under 0.25ha) (5,100 homes) that are not designated in the Local Plan.

Analysis

The Site is an excellent example of a brownfield site that is suitable for redevelopment for alternative uses. It is clearly previously developed, and it is in an accessible location with easy access to the surrounding road network. Given that it is proposed to be located within the boundary of the NSOA, it is identified as a priority location for new homes and commercial development.

The Site is bounded by residential development to the north, indicating its suitability for residential development, and it is easily accessible on foot, by car and via public transport. It extends to approximately 4.64ha. It therefore has the potential to accommodate a significant number of dwellings, especially if it was to be developed for tall buildings.

Given the Site’s development potential DTZ supports the inclusion of the Site within the NSOA. Whilst draft Policy GSS01 identifies the NSOA as having the capacity for 250 homes, it is also an identified location for tall buildings (draft Policy CDH04). Therefore, the Site presents an opportunity to deliver a significantly larger quantum of homes than currently indicated, as well as other types of development.

Opportunity Areas are defined at paragraph 2.1.1 of the London Plan as “*significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity.*” In the London Plan, the NSOA is identified as an opportunity to provide 2,500 homes and 3,000 jobs. However, by comparison, Lee Valley Opportunity Area is identified to provide 21,000 homes and 13,000 jobs. The Site provides an opportunity within the NSOA to boost the number of homes and jobs that could be provided. The boundaries of the NSOA should therefore be clearly defined to provide certainty on the amount of development that could be delivered.

Summary

Draft Policy GSS01 as currently worded is not effective or entirely consistent with national policy, as it fails to prioritise brownfields sites to make the most effective use of land. As such, we propose that the policy is amended as set out below, to prioritise brownfield sites for development opportunities for homes and other uses. DTZ is also supportive of the prioritisation of sites such as the NSOA for delivering homes and commercial development.

However, as discussed above, the boundaries of the NSOA should be clearly defined within the Policies Map to provide certainty on the amount of development that can be delivered. DTZ will also engage with the emerging Area Action Plan / Planning Framework on this.

These amendments would ensure that the plan is consistent with national policy, with respect to Chapter 5 of the NPPF and significantly boosting the supply of homes.

“The Council will create the conditions for sustainable growth to deliver the homes, jobs, retail floorspace and community facilities to meet Barnet’s identified needs. Infrastructure is key to supporting growth, including investment in transport, education, health and open spaces.”

Employment growth between 2021 and 2036 will create more than 27,000 new jobs, many within the Brent Cross Growth Area where permission has been

granted for 395,000 m2 (net) of office space and 56,600m2 (net) retail at an enhanced Brent Cross Shopping Centre which will be integrated into a new Metropolitan Town Centre.

Elsewhere, up to 67,000m2 of office floorspace will be distributed across Barnet's town centres.

Major new public transport infrastructure is delivered at the new Brent Cross West station and West London Orbital, with potential for Crossrail 2 subject to confirmation.

New homes will be directed to the following locations:

a) Growth Areas (23,300 homes):

- Brent Cross Cricklewood Opportunity Area – 9,500 homes (Policy GSS02)*
- Brent Cross West – 1,800 homes (Policy GSS03)*
- Cricklewood Town Centre – 1,400 homes (Policy GSS04)*
- Edgware Town Centre – 5,000 homes (Policy GSS05)*
- Colindale Opportunity Area – 4,100 homes (Policy GSS06)*
- Mill Hill – 1,500 homes (Policy GSS07)*

b) District Town Centres – 5,400 homes (Policy GSS08)

c) Existing and Major new public transport infrastructure (1,650 homes) (Policy GSS09):

- London Underground and Network Rail stations and environs, including car parks – 450 homes*
- New Southgate Opportunity Area (potentially supported by Crossrail 2) – 250 homes*
- West London Orbital (WLO) support further intensification around the stations at Cricklewood, Hendon and Brent Cross West - 950 homes*

d) Estate renewal and infill (including Grahame Park) – 4,400 homes (Policy GSS10)

e) Major thoroughfares – 3,350 homes (Policy GSS11)

f) Other large sites including land at Middlesex University in Hendon and car parks – 2,800 homes (Policy GSS12)

Housing growth will come forward on small sites (5,100 homes) that are not designated in the Local Plan. This figure, based on previous trends for delivery from small sites, contributes towards meeting the overall housing target for the Borough. Small sites must be delivered in suitable locations that take account of planning designations and environmental restrictions, including avoiding areas at most risk of flooding. The Council will produce a Sustainable Design Guidance SPD that sets out area wide design codes for small site development.

Previously developed sites, which fall within or outside of the locations identified above, should be prioritised for development opportunities for homes and other uses.

Where there is a compelling case to secure economic and social benefits in the public interest, the Council will be prepared to use its compulsory purchase powers to facilitate site assembly.

In ensuring the delivery of sustainable growth the Local Plan has allocated land for development as set out in Annex 1 – Schedule of Proposals. All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site proposals. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site.”

Draft Policy GSS09: Existing and Major New Transport Infrastructure

Draft Policy GSS09 seeks to deliver growth and regeneration at existing transport hubs and alongside major new transport infrastructure at New Southgate and West London Orbital. This includes development for new homes, employment and community, retail and commercial uses.

The policy states that New Southgate and Crossrail 2 have the potential for at least 250 new homes and that the Council will consider new planning frameworks to support comprehensive redevelopment in alignment with progress on Crossrail 2.

Analysis

Whilst this policy supports the opportunity for development at New Southgate, it does not consider the options available if Crossrail 2 is not delivered. The supporting text at paragraph 4.23.6 which states “*If the Crossrail 2 project does not come forward, there will be a greater focus on opportunities in the area around the North Circular Road*”, highlights the development opportunities around the North Circular Road, which include the Site, and DTZ supports this.

Summary

In light of the above, the policy wording is currently unsound as it fails to take into account reasonable alternatives (ie Crossrail 2 not coming forward), and it is therefore not justified. We therefore recommend the following amendment to the policy wording:

“To deliver growth and regeneration at existing transport hubs and alongside major new transport infrastructure at New Southgate and West London Orbital, the Council will seek the following quantum of development across the area:

- 1,650 new homes;*
- Retain existing levels of employment and pursue opportunities for new jobs;*
- Appropriate floorspace for community, retail and commercial uses.*

The Council will seek to prepare more detailed policy frameworks for these areas, such as through an Area Action Plan or Supplementary Planning Document, potentially through joint working where appropriate.

Major transport infrastructure upgrades

The potential major transport infrastructure upgrades of the West London Orbital (WLO) and Crossrail 2 would provide opportunities for growth in Barnet through developing new stations or upgrading the capacity of existing stations and allowing higher density developments to be achieved. Proposals on sites in proximity to these public transport improvements will be expected to deliver a density and quantum of residential units which optimise their potential.

***West London Orbital (WLO)** – potential for 950 new homes. The Council will support development proposals that facilitate access to and delivery of the West London Orbital and contributions will be sought towards West London Orbital and public transport infrastructure. The Council will consider new planning frameworks to support comprehensive redevelopment in alignment with progress on the West London Orbital.*

New Southgate and Crossrail 2** – potential for at least 250 new homes. The Council will consider new planning frameworks to support comprehensive redevelopment in alignment with progress on Crossrail 2. **If the Crossrail 2 project does not come forward, there will be a greater focus on opportunities in the area around the North Circular Road.

Existing Transport Hubs

Public transport hubs with high levels of PTAL in Barnet offer significant potential for intensification and growth. The stations not linked to a town centre which are expected to support development are: Mill Hill East, New Southgate, Hendon and Brent Cross West (under construction).

Development at these public transport nodes will be supported, provided that the proposal:

- *Enhances the capacity, access and facilities of the transport interchange;*
- *Demonstrates optimised density;*
- *Delivers residential uses, or otherwise demonstrates why uses with economic or community benefits are allowable;*
- *Supports active travel modes and the healthy streets approach;*
- *Avoids unacceptable levels of air and noise pollution for the new residents • Is not detrimental to heritage assets; and*
- *Supports and, where appropriate improves, public access to open space and play space.*

Where it is proposed to develop a station car park, the Council expects a demonstration of how the use of public transport and active modes of travel will encourage reduced car park usage. Existing provision must be assessed and replacement car parking may be supported through a more land-efficient design approach such as a multi-storey design.”

Draft Policy CDH04: Tall Buildings

Draft Policy CDH04 defines tall buildings as those which are between eight and 14 storeys, and very tall buildings are defined as those which are 15 storeys and above. The policy states that very

tall buildings will not be permitted unless exceptional circumstances can be demonstrated, but it does list a number of strategic locations where tall buildings may be acceptable, one of them being the NSOA.

Analysis

The Site is included within the NSOA, which is identified as one of the potential locations for tall buildings. The Site meets the criteria for tall buildings as set out in the Tall Buildings Update, London Plan Policy D9 and in the supporting text for draft Policy CDH04. The site is well-connected by public transport and has good access to services and amenities. It does not affect any locally important views as set out on Map 4 of the Draft Barnet Local Plan and there are no nearby heritage assets.

DTZ is supportive of the identification of the NSOA as an appropriate location for tall buildings as it presents a suitable opportunity to deliver a significant number of homes. Tall buildings on the Site would optimise its capacity.

Summary

As set out in the representations to draft Policy GSS01, DTZ propose that the boundary of the NSOA is clearly defined, to provide certainty for developers with regard to appropriate locations for tall buildings. DTZ considers that this amendment is necessary to ensure that draft Policy CDH04 is effective and consistent with national policy, by making effective use of the Site.

Draft Policy TOW01: Vibrant Town Centres

Draft Policy TOW01 seeks to promote the vitality and viability of the Borough's town centres by managing a strong hierarchy of town centres as the priority location for commercial, business and service uses. The policy supports an appropriate mix of uses in Brent Cross, Edgware, Cricklewood, District Town Centres and Local Centres. It also seeks to enhance and protect local parades outside of town centres.

Analysis

The draft policy wording requires a town centres first approach to be applied, with proposals for main town centre uses outside of town centres being subject to the sequential test. The policy also requires any proposal of more than 500sqm of retail, office or leisure development in an edge or out of centre location to be supported by an impact assessment.

We recommend that existing retail parks in accessible locations are acknowledged as sequentially preferable sites for main town centre uses. Sites such as this already accommodate retail and other main town centre uses and, therefore, they represent a sustainable location for further development.

The policy also fails to acknowledge that the sequential test should be proportionate to the scale and nature of a proposal.

Furthermore, the proposed threshold of 500sqm is significantly below the national threshold of 2,500sqm as set out in paragraph 90 the NPPF. There is no justification for the proposed lower retail impact threshold as the Council does not have an up to date retail study (the most recent document is the Town Centre Floorspace Needs Assessment (2017)), and we consider that, as

proposed, this would have a detrimental impact on the delivery of development. This does not represent a positive approach to retail development.

Summary

The current wording of draft Policy TOW01 is unsound as it is not positively prepared, justified or consistent with the NPPF. We therefore propose that the following amendments are made:

“The Council will promote the vitality and viability of the Borough’s town centres by managing a strong hierarchy of town centres as the priority location for commercial, business and service uses.

The Council will work with local partners to better define and enhance the distinctive character of individual town centres including improvements outlined in public realm strategies and through taking a more visible and co-ordinated approach to address a range of uses including anti- social behaviour, car parking, street cleaning and licensing.

(a) The Council will support an appropriate mix of uses within designated centres:

i) Brent Cross (see policy GSS02) to 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.

ii) Edgware (see policy GSS05) where regeneration will consolidate the quantum of retail floorspace alongside improvements to the quality of the retail and leisure offer, whilst providing a range of community uses. New housing will also form a key part of significant growth of the local economy.

iii) Cricklewood (see policy GSS04) where regeneration will support the improvement of the retail offer alongside new housing, community and leisure facilities.

iv) District Town Centres (see Policy GSS08) which will be promoted to provide a network of complementary retail, leisure and community uses as well as new housing development.

v) Local Centres (including new provision at Colindale Gardens) which will be promoted to provide a local level of retail and community uses and smaller scale residential led mixed use development.

(b) Outside of the town centres local parades will be enhanced and protected with strong safeguarding for local community shops (that meet the criteria of Use Class F2) Proposals that involve the loss of such facilities will be required to provide a robust justification that similar shops are within a 1km walking distance.

(c) In order to reduce car trips the Council supports the relocation and expansion of leisure uses from lower PTAL car dependent locations to town centre locations where opportunities arise.

*(d) Following a ‘town centres first approach’, the sequential test will be applied to ensure sustainable patterns of development are achieved; therefore, outside of town centres any development of main town centre uses will not be permitted unless it can be demonstrated through the NPPF sequential approach that there are no suitable premises/sites available in the designated centres as set out in Table 13 and that there would be no harm to the vitality and viability of these centres by the approval of edge-of centre and out of centre development. **After centres and edge-of-centre sites the sequential approach should prioritise existing retail parks in accessible locations (including Friern Bridge Retail Park) as sequentially preferable sites for main town centre uses. The application of the sequential test must be proportionate and appropriate for the scale and nature of the given proposal.** In addition, any proposal of more than 2,500 m² of retail, office or leisure development in an edge or out of centre location must be supported by an impact assessment.*

(e) The Council will apply the Agent of Change principle in order to protect residential amenity from new development and also to protect existing businesses from residential development introduced nearby.”

Draft Policy ECY01: A Vibrant Local Economy

Draft Policy ECY01 seeks to protect and promote new employment opportunities. With respect to industrial development, the policy wording supports appropriate proposals within Locally Significant Industrial Sites (LSIS) for Class B2 (general industry); Class B8 (storage or distribution); and/ or uses related to light industrial or research and development (now Class E(g)(ii) and (iii); and Sui Generis uses, where it is an employment generating use compatible with an industrial use.

Part (j) of the policy supports new industrial employment space (as defined above) outside of LSIS if the following criteria are met:

- i. The new employment use would contribute towards the Council’s regeneration objectives.
- ii. Employment uses which generate high levels of movement should be located in close proximity to tier one and two roads
- iii. The new use does not have any adverse impact on residential amenity.
- iv. The site is not allocated for an alternative use including residential, education or community uses

The supporting text for the policy highlights that Barnet has a relatively low supply of established industrial sites and office accommodation and that requirements for this space are changing, partly in response to the COVID19 pandemic. Furthermore, paragraph 9.7.1 states that the London Industrial Land Demand Study (LILDS) identifies Barnet as needing to retain industrial land as the vacancy rates are below the London average. Paragraph 9.7.3 states that Barnet envisages meeting its identified need for industrial development through intensification and windfall.



Analysis

DTZ is supportive of this policy, which seeks to support economic growth and productivity in line with paragraph 82 of the NPPF, and which also seeks to make the most effective use of suitable sites.

As mentioned in representations to draft Policy GSS01 we support that Friern Bridge Retail Park is included in NSOA, as it could be a suitable redevelopment site in the future for logistics and distribution. The Site's redevelopment for logistics / distribution related uses would comply with part (j) of the policy, as it would meet the four required criteria, as explained below:

- i. it would make effective use of the existing site and contribute towards the regeneration of the wider area;
- ii. It is well connected to the surrounding road network via the A406;
- iii. the redevelopment of the site could be designed to provide a buffer between the nearest residential dwellings and any potential adverse impact on residential amenity could be appropriately mitigated;
- iv. the Site is unallocated.

Summary

In light of the above, DTZ is supportive of draft Policy ECY01, as it is positively prepared, justified, effective and consistent with the NPPF, as such, the policy is sound.

CONCLUSION

These representations are submitted in the interest of ensuring and maintaining the most effective use of land at Friern Bridge Retail Park. On behalf of DTZ, we request that our suggested amendments are made in respect of the Key Diagram and draft Policies BSS01, GSS01, GSS09, CDH04 and TOW01.

Our suggested amendments seek to ensure that the plan is positively prepared, justified, effective and consistent with national policy and we trust that they will be taken into account during the preparation of the Barnet Draft Local Plan (Reg 19) 2021 to 2036.

If you have any queries, please let us know.

Yours faithfully



Nicola Sewell
Associate Director