Barnet Draft Local Plan Representation Form B



Barnet Draft Local Plan

Publication Stage Representations Form

Ref:

(For official use only)

PART B - Your representation

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

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

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

Policy _____ Paragraph _____ Figure/Table _____

Policies Map designation __Garrick Industrial Centre LSIS Boundary_____

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 🗆
b)	Sound	Yes □	No 🗹
c)	Compliant with the Duty to Co-operate	Yes □	No 🗆

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.

I refer to the enclosed Consultation Representations on the Car Showroom, The Hyde, Edgware Road, London NW9 6BH dated August 2021 (Ref: 13034). We do not consider the continued inclusion of the Car Showroom site within the Garrick Industrial Centre LSIS is sound as it is not positively prepared or justified for the reasons set out in the above referenced Representations. The Site is located along a designated Major Thoroughfare which is considered a growth corridor suitable for higher density residential development which would contribute to the Borough's ascribed housing targets. Residential led redevelopment also offers opportunities to improve the public realm and pedestrian and cycling connectivity by the delivery of a new pedestrian bridge across the Silk Stream to connect approximately 2200 dwellings to the north of Silk Stream with Hendon Station. Residential led redevelopment of the Site would also compliment the recently approved residential led redevelopment of the Sainsburys site to the north by providing biodiversity enhancement measures along the Silk Stream including restoration and improving accessibility to members of the public in connection with the provision of a new pedestrian bridge. The Sites continued allocation in the Garrick Industrial Centre LSIS would continue to prejudice the residential amenity of existing neighbouring dwellings to the south as well as the recently approved residential dwellings to the north, as well as prejudice the delivery of significantly public realm improvements to Edgware Road, Garrick Road, Silk Stream and improved pedestrian and cyclying connectivity across Silk Stream.

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.

Our Consultation Representations on the Draft Local Plan (Reg 18) dated March 2020 (Enclosed for reference) set out the reasons why we consider it is appropriate to take the Site out of the current LSIS designation.

Our Consultation Representations dated August 2021 offers an alternative approach which would involve a land swap of LSIS land which would increase the amount of LSIS and industrial land in a more appropriate location in the Borough. This would release the Car Showroom site for residential led redevelopment in a highly sustainable location and would also deliver other key Local Plan objectives including the Major Thoroughfare designation, biodiversity improvements to the Silk Stream as well as the pedestrian bridge across Silk Stream.

I refer to our detailed consultation response enclosed dated March 2020 and August 2021 for more information.

Continue on a separate sheet if necessary

Please note:

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

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

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

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

We consider it will be necessary to participate in the hearing sessions to outline the benefits of taking the site out of the LSIS designation and why it would deliver the key objectives set out by the Council in the Draft Local Plan within the plan period by our client.

Declaration of consent

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

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

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

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

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

Signature	_Barry Murphy	Date	9'	th August 2021
-----------	---------------	------	----	---------------------------

DRAFT LOCAL PLAN (REG 19) (JUNE 2021)

CONSULTATION REPRESENTATION

RELATING TO LSIS SUBSTITUTION OF CAR SHOWROOM, THE HYDE, EDGWARE ROAD, LONDON, NW9 6BH AND PENTAVIA RETAIL PARK, WATFORD WAY, LONDON, NW7 2ET



6 New Bridge Street London EC4V 6AB T: 020 7489 0213

F: 020 7248 4743 E: info@dwdllp.com W: dwdllp.com

CONTENTS

1.0	INTRODUCTION	. 3
2.0	SITE AND SURROUNDINGS	. 4
Hyd	le Site 4	
Ret	ail Park 4	
3.0	PLANNING ASPIRATIONS	. 5
4.0	PLANNING POLICY CONTEXT	. 6
Dra Lon	ft Local Plan (Reg 19) June 20216 don Plan	
5.0	LSIS SUBSTITUTION	. 9
6.0	SUMMARY	12

APPENDICIES

APPENDIX 1 - SITE LOCATION PLAN (INDICATIVE)

Disclaimer

This report has been produced by DWD, the trading name of Dalton Warner Davis LLP, a Limited Liability Partnership. Registered in England No. OC304838. Registered Office: 6 New Bridge Street, London, EC4V 6AB. The report is intended for the sole and exclusive use of the instructing client or party. The report shall not be distributed or made available to any third party or published, reproduced or referred to in any way without the prior knowledge and written consent of DWD. The report does not constitute advice to any third party and should not be relied upon as such. DWD accepts no liability or responsibility for any loss or damage to any third party arising from that party having relied upon the contents of the report in whole or in part.

1.0 INTRODUCTION

- 1.1 DWD are instructed on behalf of Aberdeen Standard Investments PLC ("Client") to review the proposed Regulation 19 Consultation Version of the Barnet Draft Local Plan (June 2021) ("Draft Local Plan") and submit this consultation representation ("Consultation Rep") which is intended to promote the Car Showroom, The Hyde, Edgware Road, London, NW9 6BH ("Hyde Site"), a designated Locally Significant Industrial Site ("LSIS") for substitution with the undesignated Pentavia Retail Park, Watford Way, London, NW7 2ET ("Retail Park") (See: Appendix 1). This Consultation Rep is intended to promote the LSIS substitution for formal recognition in Barnet's Draft Local Plan through substitution of the LSIS designations.
- 1.2 This Consultation Rep is submitted to the London Borough of Barnet ("**Council**") under Regulation 19 of the Town and Country Planning Local Planning) (England) Regulations 2012 Act 1990. DWD were previously instructed by the Client to submit a consultation representation to Barnet's Draft Regulation 18 Draft Local Plan, which recommended the release of the Hyde Site from its LSIS designation and promoted the Hyde Site for designation in the Local Plan for a residential-led development on Barnet's schedule of allocated sites. This Consultation Rep is therefore intended to follow on from the Regulation 18 Draft Local Plan representation.
- 1.3 The Hyde Site is grouped with the Garrick Industrial Centre, as a designated Locally Significant Industrial Site ("LSIS"), however the site is currently not used for industrial purposes and sits outside the remainder of the Industrial Estate accessed from Irving Way. The Retail Park is classified as 'white land' in the Development Plan where no specific allocation applies.
- 1.4 The Consultation Rep will outline why a substitution of the LSIS designation of the Hyde Site with the Retail Park is considered appropriate and would have significant policy benefits to the Council whilst simultaneously unlocking the potential of the Hyde Site for a residential-led development.
- 1.5 The sections of this Consultation Rep therefore set out the site and surrounding context for both sites (Section 2), along with the current planning aspirations for both sites (Section 3). This Rep will then explore the adopted and emerging planning policy position for both sites as they relate to the Hyde Site's LSIS designation and substitution (Section 4), before going on to explore why a substitution approach is considered appropriate (Section 5). Section 6 provides a summary to support the recommendation of this Consultation Rep.

2.0 SITE AND SURROUNDINGS

Hyde Site

- 2.1 The Hyde Site is located along Edgware Road in the Borough approximately 500m west of Hendon Thameslink station. The Hyde Site measures approximately 0.79Ha and is in use as a car showroom with associated car parking.
- 2.2 The Hyde Site is located adjacent to the Garrick Road Industrial Estate ("Garrick Estate"). The Garrick Estate comprises mostly of storage and distribution centres and also has large wholesale retailers. The Site is grouped with the Garrick Estate as a designated LSIS, however the Site is currently not used for industrial purposes and sits outside the remainder of the Industrial Estate accessed from Irving Way. The Hyde Site is currently occupied by a single-storey car showroom with car servicing and repair located to the rear, which provides circa 4,680sqm of floorspace (which includes ancillary office space and workshops).

Retail Park

- 2.3 The Retail Park is an irregular shaped plot of land measuring 3.94ha in area. The Retail Park comprises a cluster of part-vacant large retail units (Use Class A1) providing 9,053 sqm (GIA) of floorspace, and a standalone restaurant unit at the southern end of the Site formerly occupied by TGI Fridays (Use Class A3) that provides 664 sqm of floorspace. The total floorspace for the existing built form on the site is 9,717 sqm (GIA).
- 2.4 The Retail Park comprises a strip of land located between the M1 to the west, the A1 / Watford Way to the east and Bunns Lane to the north and north east. The Retail Park is currently accessed off the A1 from the south via a mini roundabout that serves both the Site and a petrol filling station adjacent to the Retail Park's southern boundary
- 2.5 The Retail Park is classified as 'white land' in the Development Plan where no specific allocation applies. The Retail Park (and whole Borough) is located in an Air Quality Management Area and the Site is located in a proposed Air Quality Focus Area as designated in the recently adopted London Plan (2021).

3.0 PLANNING ASPIRATIONS

- 3.1 An application for planning permission under planning ref 17/8102/FUL was submitted on the Retail Park for the "Redevelopment of site including the demolition of all existing buildings and construction of 724 new Build to Rent residential units (Use Class C3) along with 949 sqm of ancillary residential facilities, 987 sqm of non-residential floorspace (Use Class A1, A3 and D1.... [shortened]" ("2018 Application"). The 2018 Application was referred to the Mayor of London after the Council's resolution to refuse the application. The Mayor then approved the application on the 5th November 2018, however the applicant subsequently withdrew the application prior to the s106 being agreed.
- 3.2 An application has now been submitted at the Retail Park under reference 20/5933/FUL for the "Erection of a storage and distribution warehouse (Use Class B8) with ancillary offices, associated vehicle parking, van storage, pedestrian and vehicular access, landscaping and associated infrastructure works" ("2020 Application"), which is currently under consideration. The 2020 Application includes the provision of a new 9,250sqm warehouse for storage and distribution (Use Class B8) which would take advantage of the Retail Park's access to the local strategic road networks, and would provide secure future employment opportunities in the Borough given there is no long-term viability for the retail park post-COVID-19 pandemic.
- 3.3 With regards to the Hyde Site, a consultation representation was made in response to the Council's Regulation 18 Draft Local Plan which set out the suitability of the Site for a residential-led redevelopment of the Hyde Site. As set out in detail in the Regulation 18 Draft Local Plan consultation representation, the Hyde Site is located along a designated Major Thoroughfare which is considered a growth corridor suitable for higher density residential development which would contribute to the Borough's ascribed private and affordable housing targets, whilst improving public realm and connectivity between sites along the Edgware Road Major Thoroughfare and nearby transport connections. The Hyde Site is also located adjacent to the Silk Stream, which is part of a green corridor extending to Brent Reservoir. This also offers the opportunity to contribute to Borough's aspirations of providing biodiversity enhancements to the Silk Stream to the benefit of the locality.

4.0 PLANNING POLICY CONTEXT

- 4.1 Under Section 38(2), the development plan for any area within Greater London comprises the Spatial Development Strategy and the development plan documents (taken as a whole) which have been adopted and approved in relation to that area. The statutory development plan for the Site comprises of the following:
 - Barnet's Core Strategy and Development Management Policies 2012; and
 - The London Plan 2021 ("London Plan").

Draft Local Plan (Reg 19) June 2021

- 4.2 The Council is in the process of reviewing and updating the Borough's planning polices and has produced the Draft Regulation 19 Local Plan which will cover the 15-year period between 2021-2036. As part of the preparation of a local plan, Regulation 19 of the Town and Country Planning Local Planning) (England) Regulations 2012 Act 1990 states, *"Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must, (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulations 2012 Act 1990 then goes on to state, <i>"Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State"*.
- 4.3 This public consultation stage which follows the consultation period for the Regulation 18 Draft Local Plan, allows for members of the public and/or interested parties to make comment on the Council's Local Plan which they intend to submit to the Secretary of State for public examination, which can include suggesting reasonable alternatives where they exist.
- 4.4 On the 16th June 2021 the Council issued the Draft Local Plan to the Council's Policy and Resources Committee with intention to seek approval for the Plan and commence public consultation on the document. This resolution was agreed by members at the meeting and pubic consultation of the Draft Local Plan commenced on the 28th June 2021. The Draft Local Plan sets out the Council's growth plan for the local economy over the plan period 2021-2036.
- 4.5 The Draft Local Plan submission to committee was accompanied by Appendix B 'Barnet Local Plan Schedule of Representations and Responses to Preferred Approach' which sets out the Council's responses to representations made to the Regulation 18 Draft Local Plan.

- 4.6 DWD submitted representations with regards to the Council's calculated industrial land requires and a failure meet the Borough's objectively assessed needs for industrial floorspace over the lifetime of the emerging Plan. Regulation 18 Draft Local Plan Policy ECY01 was also queried given it appeared to be overly restrictive and would have precluded the development of appropriate site for employment uses outside of LSIS designations.
- 4.7 DWD also submitted representations on behalf of the owners of the Hyde Site to propose its release from its LSIS designation and its allocation for a residential-led development on the Council's schedule of allocated sites. The Regulation 18 Draft Local Plan Representation set out how - in line with the Draft Local Plan (Reg 18) Site Selection Background Report (December 2019) - the Hyde Site is considered both deliverable and developable, with a residential-led development also being suitable and achievable.
- 4.8 In response to this representation the Council stated that, "Given the LSIS designation the Council will expect any proposal to be innovative and respond positively to the safeguarding rather than the simplistic solution of changing the boundaries of the LSIS".

London Plan

4.9 The Council's assertion that proposals on the Hyde Site have to positively respond to its safeguarding have been considered in optimising the full development potential of the Hyde Site. To this end, the London Plan's approach to LSISs has been considered as London Plan Policy E7 'Industrial intensification, co-location and substitution' sets out a number of approaches to proactively dealing with intensifying industrial use in situations where land is constrained. London Plan Policy E7 also introduces the idea of substitution of industrial capacity to elsewhere in London and beyond London's boundary's where:

"1) This results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land;

2) Full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles

3) A clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements, where relevant, is in place to support this process."

- 4.10 London Plan Policy E7E continues "This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) not through ad hoc planning applications". Whilst this aspect of the policy is geared towards substitution of industrial capacity within and outside of industrial land in London, London Plan Paragraph 6.7.2 introduces the concept of substitution within parts of an LSIS in order to facilitate a release of some land for a mix of uses including residential. London Plan Paragraph 6.7.2 states, "There may be scope for selected parts of SILs or LSISs to be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses including residential".
- 4.11 London Plan Paragraph 6.7.2 requires local policy maps to clearly indicate "the area to be retained, substituted and/or intensified as SIL or LSIS (and to provide future capacity for the uses set out in Policy E5 Strategic Industrial Locations (SIL) and Policy E6 Locally Significant Industrial Sites)" and "the area to be released from SIL or LSIS (see illustrative examples in Figure 6.2)".
- 4.12 London Plan Figure 6.2 outlines a simplified approach to LSIS sites which shows intensification of the LSIS to facilitate a release of a section of the LSIS for a residential-led mixed use scheme. London Plan Paragraph 6.7.3 in referencing the approaches outlined in Figure 6.2 and Paragraph 6.7.2, states "*These approaches may be supported by land swaps* within the SIL or LSIS, within the borough or in collaboration with neighbouring authorities (DWD Emphasis)". Whilst the Hyde Site and the Retail Park are not within the same LSIS, the principal of land swapping within the Borough to provide additional LSIS land, whilst releasing existing LSIS land for alternative uses, is clearly supported by the London Plan.
- 4.13 Taking the status of the Draft Local Plan into consideration along with the planning aspirations for both the Hyde Site and the Retail Park, a land swap is considered an innovative solution which would positively respond to the Hyde Site's LSIS designation, allowing for its release to a more appropriate use given its location and the Council's ascribed policy objectives for sites along Major Throughfares.

5.0 LSIS SUBSTITUTION

- 5.1 In presenting the advantages of a land swap between the Hyde Site and the Retail Park, the salient considerations to be explored relate to:
 - Increasing allocated LSIS land and industrial floorspace
 - Contributing to the Council's ascribed housing targets; and
 - Site context
- 5.2 Firstly, it is recognised that the Barnet Employment Land Review ("BELR") identifies a need of 7.3ha of industrial land to meet forecasted demand over the Draft Local Plan period with the West London Employment Land Review identifying a need of 13.5ha of industrial land over a similar timeframe. Whilst there is a discrepancy between the figures, the reviews as Draft Local Plan Paragraph 9.7.2 states, "strongly support the safeguarding of existing industrial land, ensuring that it is managed for retention and growth and/or intensification, with no net loss of industrial land being paramount". Draft Local Plan Paragraph 9.7.3 continues, "Barnet envisages meeting the identified need through intensification and windfall".
- 5.3 Given the Retail Park is currently non-designated 'white land' in the Draft Local Plan, a proposed land swap would result in a significant uplift in the amount of designated LSIS land in the Borough versus the Hyde Site (0.79 to 3.94ha) which would make a significant contribution towards the Council meeting the identified need for industrial land over the Draft Local Plan period. Taking into consideration the amount of floorspace proposed as part of the 2020 Application, there would also be a net increase in allocated industrial floorspace across both sites from the circa 4,680sqm existing floorspace at the Car Showroom at the Hyde Site to the 9,250sqm proposed in the 2020 Application, which would adhere to the "no net loss of industrial land" ascribed as a principal in the Draft Local Plan. A land swap in this scenario would therefore have a significant planning policy benefit to the Council as it would reduce the forecasted demand for employment land without having to rely on "intensification and windfall" sites which are not guaranteed to come forward in the Draft Local Plan period.

	Existing	After Land Swap	+/- (%)
Industrial Land (ha)	0.79	3.94	398
Industrial Floorspace (sq.)	4680	9250	97

Table 1: Increase in industrial land and floorspace

- 5.4 In addition to the industrial land requirements set out in the Draft Local Plan, the Council also has housing targets which are set by the London Plan and stand at 35,460 homes across the plan period of 2021-2036. With the withdrawal of the 2018 Application, the Council lost some 724 residential units which would have contributed to the Council's ascribed housing targets. A land swap between the Hyde Site and Retail Park would unlock the development potential of the Hyde Site, and could significantly contribute towards the Council's housing targets and offsetting some of the units lost in the withdrawal of the 2018 Application. In addition, the Council also has policy aims for major throughfare development as ascribed in the Draft Local Plan which is expected to deliver 4,900 homes across the plan period.
- 5.5 As well as planning policy benefits for the Council, site context is another important consideration in illustrating the advantages of a land swap between the two sites.
- 5.6 The Retail Park is bordered by major road transport infrastructure (M1 and A1 / A41), and has direct vehicle access onto the latter, which makes it suitable for industrial uses such as the type proposed in the 2020 Application. On the contrary, the Hyde Site, whilst being located along Edgware Road, does not have as direct access to the strategic road network and it is noted that the BELR assigns a 'protect' designation to the Garrick Estate rather than 'intensify' owing to its vehicular access and proximity to residential dwellings. Despite its unsuitability compared with the Retail Park for industrial uses including distribution, the Hyde Site is located in close proximity to Hendon Thameslink Station and a residential-led development holds the key to improving connections and permeability to the station for the circa 2200 dwellings coming forward in The Hyde over the plan period. This is in contrast to the Retail Park which has a public transport accessibility level of 1b.
- 5.7 In addition to proximity to major transport infrastructure, the preservation of residential amenity is also an important consideration of site context which should be highlighted. The proximity of the Retail Park to the M1 and Watford Way (A1/A41), whilst advantageous for industrial uses does not provide the best environment for long term residential use at the Site. This is acknowledged in part by the Planning Brief for the 2018 Application which at Paragraph 4.10 in describing the environmental factors affecting the Retail Park states, "Due to the site's proximity to the M1, A1 / A41 and Midland Mainline, the site is exposed to poor air quality, high levels of particulate and severe acoustic problems". In contrast at the Hyde Site, it is considered that long term use of the Site for industrial land as a result of the Sites current policy designation, would have significant

impacts on the residential amenity of neighbouring sites, be it the residential hinterland to the south-east of the Site or the future residential development at the adjoining Sainsburys Site.

- 5.8 In both instances therefore, the site context plays a role in determining the suitability of the site use, and taking into account the constraints of the two sites context it is therefore logical and appropriate for a land swap to be considered. A land swap between the two sites within the Borough would allow for a residential-led redevelopment of the Hyde Site which would not conflict with adjacent residential development, whilst acknowledging that the Retail Park is an acceptable location for industrial use.
- 5.9 As set out above an LSIS designation land swap within the Borough between they Hyde Site and Retail Park is considered an appropriate mechanism to unlock the full development potential of the Hyde Site, in addition to the long-term safeguarding of the Retail Park for industrial use with the intended outcome across both sites having positive policy implications for the Council in achieving the growth mapped in the Draft Local Plan.

6.0 SUMMARY

- 6.1 This Consultation Rep has been prepared to support an LSIS land swap in the Draft Local Plan in order to unlock the optimum long term planning use for the Hyde Site and secure the undesignated Retail Park for employment use.
- 6.2 As this Consultation Rep demonstrates there would be significant planning policy benefits for the Council in terms of increasing the amount of LSIS and industrial land to reduce the identified deficit to need over the Draft Local Plan period. Releasing the Hyde Site from its designation would also unlock its full development potential which would provide additional housing to meet the Council's ascribed targets in addition to offsetting the loss of the 724 houses which were to be approved on the Retail Park under the withdrawn 2018 Application.
- 6.3 In addition, when analysing the existing site contexts for both the Hyde Site and the Retail Park an LSIS land swap is the most logically approach in both instances owing to nearby properties and proximity to transport infrastructure.
- 6.4 Therefore in line with the right to provide a consultation response on the Draft Regulation 19 Local Plan under the provisions of Regulation 20 (1) of the Town and Country Planning Local Planning) (England) Regulations 2012 Act 1990, the Council is respectfully requested to consider the recommendations of this Consultation Rep to swap the LSIS land designation of the Car Showroom, The Hyde, Edgware Road, London, NW9 6BH with the undesignated Pentavia Retail Park, Watford Way, London, NW7 2ET in the Draft Regulation 19 Local Plan. We would be grateful for an opportunity to discuss these matters further with the Planning Policy Team.

APPENDIX 1 – SITE LOCATION PLAN (INDICATIVE)



DO NOT SCALE THIS DRAWING

Contractors are to check all dimensions prior to commencement on site and notify the architect of any errors, omissions, or discrepancies.

TateHindle Limited retain copyright of this drawing. It may not be copied, altered or reproduced in any way without their written authority.

Key :

TRAIN LINE

V

, HENDON STATION

Site Boundary

ev	Description	
0	Revision 0	

14/05/19

Date Checked

_{Status} Feasibility

Client Sun Life Company of Canada c/o Aberdeen Standard

Project

Edgware and Garrick Road

Drawing

Existing Site Plan

Scale	Drawn	Date	Checked	
As indicated	PB	05/14/19	MB	
Project no.	Drg		Revision	
15195	A - (02	x - (02) - 100		

TateHindle Limited

50

1 Lindsey StreetT 020 7332 4850Smithfieldmail@tatehindle.co.ukLondon EC1A 9HPwww.tatehindle.co.uk



Contractors r This drawing project only. This drawing For other info referenced du To be read in	Architects are to be notified of any discrepancies. Contractors must check all dimensions on site. This drawing is subject to copyright laws and is for use on this project only. This drawing is to be used solely for the information as titled only. For other information refer to the latest revision of any cross referenced drawings. To be read in conjunction with relevant design standards/protocols							
standards/pro	otocols							
B 01/12/20 A 27/11/20 # 18/11/20 Rev Date	Boundary Redline u First Issu	e	ng comments		JML JML JML Drn	MA MA MA Cd		
Status:		Plan						
Client:	Glea	ave Pa	artner D	rship				
Project nam	e:	L. 1	D					
	Mi	ll Hill,	Lond	lon				
Project addr Penta		Retai	l Park	. Mill I	Hill	•		
	Pentavia Retail Park, Mill Hill, London NW7 2ET							
Drawing Title: Site Location Plan								
Job No: 20-646	61	Drg No: P()1	Revision: E	3			
Date: Nov 20	20	Scale: 1:1	250	Sheet size				
	C		C		1			
1 CARE	ARCHITECTS 1 CARDALE PARK, BECKWITH HEAD ROAD, HABBOGATE N YORKSHIBE HG3 1B7							
	HARROGATE, N.YORKSHIRE, HG3 1RZ WWW.SSA-ARCHITECTS.CO.UK T: 01423 856999							

