



Our Ref:

Your Ref:

09 August 2021

Draft Local Plan Regulation 19 Consultation  
London Borough of Barnet  
2 Bristol Avenue  
Colindale  
London  
NW9 4EW

Dear Sir/Madam

**Representations to the Barnet Draft Local Plan Regulation 19  
Landsec**

We write on behalf of Landsec to submit representations on the Barnet Draft Local Plan Regulation 19, dated June 2021.

Landsec made previous representations in March 2020, submitted by WSP | Indigo, on the Barnet Draft Local Plan Regulation 18, dated January 2020.

As one of the largest real estate companies in Europe, Landsec's £13.4 billion portfolio spans 24 million sq. ft of well-connected, experience-led retail, leisure, workspace and residential hubs, with a growing focus on London. From the iconic Piccadilly Lights in the West End and the regeneration of London's Victoria, to the creation of retail destinations at Westgate Oxford and Trinity Leeds, Landsec own and manage some of the most successful and memorable real estate in the UK. Landsec aims to lead the real estate industry in critical long-term issues – from diversity and community employment, to carbon reduction and climate resilience. Landsec have committed to becoming a net zero carbon company by 2030 and have recently set a new commitment to create £25 million of social value through community programmes by 2025.

Landsec is promoting Great North Leisure Park (GNLP) for redevelopment. Part of the site is currently proposed for allocation for residential-led, mixed use development under Site Reference 67. Landsec consider there to be significant scope for comprehensive residential-led redevelopment of the site to deliver circa 800 homes with a mix of other uses, with opportunity to introduce ecological and biodiverse landscapes, areas of public realm, and connection to the neighbouring MOL.

We provide the following responses to pertinent points of the Draft Local Plan which are of particular relevance to our client. This follows the format of the Regulation 19 Representation Form Part B as requested. As required on Part B we agree to the contact details, 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.

### **Draft Policy BSS01 Spatial Strategy for Barnet**

Draft Policy BSS01 seeks to deliver a minimum of 35,460 homes over the Plan period (2021-2036). This equates to an annual target of 2,364 homes. Landsec consider it appropriate that the overall housing target is expressed as a minimum, to enable opportunity for further appropriate housing delivery to come forward to support the Mayor of London strategic housing targets, and the Government's ambition to significantly boost the supply of housing as set out in Paragraph 60 of the National Planning Policy Framework (NPPF) (July 2021).

It is noted the Regulation 18 version of this draft policy previously set the housing target as a minimum of 42,000 homes. As part of the previous representation, Landsec expressed support for the retention of this target rather than a reduced target to align with the London Plan (at that time also in draft form), as is now included in the Regulation 19 version. It is noted that the Council had an advisory meeting with Inspector Louise Crosby in April 2021 ahead of the Regulation 19 Draft Local Plan being published. The notes of this meeting state the Inspector advised the Council to set its housing requirement to match that handed down by the adopted London Plan (35,460) but keep the supply as presented (closer to 46,000). This use of this approach is set out in Supporting Para 4.4.5 of the Regulation 19 Draft Local Plan. The Inspector references the PGG which states 'where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategic or non-strategic policies'. However, and as acknowledged by the Inspector, the London Plan target is based on capacity rather than need and it is widely accepted that the need is much greater. On this basis, we consider the reintroduction of the 42,000 homes target, which closer aligns with the Borough's Objectively Assessed Need (OAN) as set out in the London Borough of Barnet Strategic Housing Market Assessment Update (SHMA) (October 2018) for 3,060 homes per year (45,900 over the 15-year life of the Plan) would be an appropriate and sound approach, and we request this is taken forward.

### **Draft Policy GSS01 Delivering Sustainable Growth**

Draft Policy GSS01 directs new homes to a number of locations including 3,350 homes to be delivered along major thoroughfares. The Regulation 18 version considered 4,900 homes would be delivered along major thoroughfares. As with Draft Policy BSS01 Landsec would support the reintroduction of the target expressed in the Regulation 18 version.

In addition, Landsec continue to request that the breakdown of figures for each location be expressed as a minimum in the same manner as the overall housing target is expressed as a minimum. For example, the under part e), it is requested that the policy wording be amended to read:

*"e) Major thoroughfares - minimum of 3,350 homes (Policy GSS11)".*

This will retain flexibility in the policy, will maximise development potential and encourage the most efficient use of land, in line with Paragraph 124 of the NPPF.

### **Draft Policy GSS11 Major Thoroughfares**

Landsec continues to support the inclusion of a separate policy relating to the delivery of new homes along major thoroughfares. As expressed under Draft Policy BSS01, and set out in the previous section, the wording of Draft Policy GSS11 should confirm that the delivery of 3,350 homes (or preferably the Regulation 18 target of 4,900 homes) is a minimum. It is recommended that the policy is altered to read:

*“Such locations have capacity to deliver a minimum of 3,350 additional new homes”.*

This allows for flexibility to be maintained in the policy, and as set out previously, will maximise development potential and encourage the most efficient use of land in line with Paragraph 124 of the NPPF.

The Regulation 19 version introduces the following revised wording to Draft Policy GSS11:

*“The A5/ Edgware Road and the A1000 / Great North Road Major Thoroughfares may have potential for residential led tall building development in certain locations optimising site availability and good public transport accessibility, providing the opportunity for revitalising these areas. Further guidance will be provided by the emerging Height Strategy Supplementary Planning Document.”*

Landsec support the acknowledgement within this policy of the suitability of locations along A5/ Edgware Road and the A1000 / Great North Road Major Thoroughfares for residential led tall building development, however the current wording of the Draft Local Plan is considered inconsistent with London Plan Policy D9. Part B of London Plan Policy D9 is as follows:

- 1) *Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.*
- 2) *Any such locations and appropriate tall building heights should be identified on maps in Development Plans*
- 3) *Tall buildings should only be developed in locations that are identified as suitable in Development Plans.*

The Draft Local Plan has determined there are locations where tall buildings may be an appropriate, which includes Major Thoroughfares, through the Tall Buildings Update Document (2019) which forms part of the evidence base. This is considered to satisfy the first criteria of London Plan Policy D9 Part B.

With respect to the second criteria, neither the Draft Local Plan nor the Changes to the Policies Map (Reg 19) identify locations for tall buildings, and this is inconsistent with London Plan Policy D9 and therefore not considered sound. It is acknowledged that the Council intend to bring forward an emerging Height Strategy Supplementary Planning Document, however timescales for this are unknown and the Council has yet to publish a draft for public consultation. It is therefore

requested that the Draft Local Plan and the Draft Policies Map is updated to clearly identify on maps all locations where tall buildings may be an appropriate, and the appropriate tall building heights. This must include the areas identified in Draft Policy CDH04, as listed below:

- Brent Cross Growth (Opportunity) Area (Policy GSS02);
- Brent Cross West Growth (Opportunity) Area (Policy GSS03);
- Colindale Growth (Opportunity) Area including Grahame Park Estate (Policy GSS06);
- Cricklewood Growth (Opportunity) Area (Policy GSS04);
- Edgware Growth Area (Policy GSS05);
- West Hendon Estate (Policy GSS10);
- New Southgate Opportunity Area<sup>27</sup> (Policy GSS09);
- Major Thoroughfares - Edgware Road (A5) and Great North Road (A1000) (Policy GSS11); and the
- Town Centres of Finchley Central and North Finchley (Policy GSS08)

In addition, the policy wording within Draft Policy GSS11 should be updated to reflect that sites with good public transport accessibility or those where there are opportunities to support modal shift towards more sustainable transport modes, have the potential for residential led tall building development which can revitalise these areas.

In light of the above, it is requested that the policy wording to his Draft Policy GSS11 amended to read:

*"The A5/ Edgware Road and the A1000 / Great North Road Major Thoroughfares has potential for residential led tall building development in certain locations, as identified on the Policies Map, optimising site availability and good public transport accessibility or where there are opportunities to support modal shift towards more sustainable transport modes, providing the opportunity for revitalising these areas. Further guidance will be provided by the emerging Height Strategy Supplementary Planning Document."*

These requested amendments are considered necessary in order for the Draft Local Plan to be consistent with the London Plan and to deemed sound in accordance with the tests set out in Para 35 of the NPPF.

### **Draft Policy GSS12 Car Parks**

Landsec continues to be in general support of LBB's intention to support the redevelopment of existing surface level car parks for residential and other suitable uses. Draft Policy GSS12 is considered to reflect London Plan Policy H1 and SD7 which also support mixed use redevelopment of car parks and low-density retail parks and supermarkets. GNLP currently includes a large surface car park which provides parking for the leisure facilities on the site.

It is noted that an additional assessment criterion has been introduced into this Policy to require that development 'demonstrates how the use of public transport and active modes of travel will

lead to reduced car park usage'. Landsec has no objection in principle to this additional criterion. As part of its redevelopment, Landsec will be looking to reconfigure GNLP in order to make the most efficient use of land, with specific levels of car parking to be appropriately determined at subject to the nature of the development and the uses which are proposed. The nature of the proposals, discussed in further detail within this Letter, will result in an overall reduction in car trips associated with the existing leisure park, which is considered to accord with this Draft Policy.

In addition, this Policy also now states 'in considering local capacity the Council may seek a dedicated development related parking strategy in order to review the existing pricing, timing, availability and management of car parking spaces'. Landsec consider that the need for, and scope of, any parking strategy should be subject to discussions with planning and highway officers at pre-application stage and should be proportionate to the proposed change in car parking quantum and the uses which are proposed as part of any future redevelopment proposal.

#### **Draft Policy CDH04 Tall Buildings**

Landsec strongly support the amendment to Part C which removes the 28-storey height limit for Very Tall Buildings, which was not supported by the Borough's evidence base (2019 Tall Buildings Update).

It is noted the Tall Buildings Update Document (2019) identifies the Finchley High Road (A1000) Major Thoroughfare as suitable for tall buildings of between 8 and 14 storeys. Landsec continues to consider that Major Thoroughfares should be considered as appropriate locations for Very Tall Buildings (15 storeys or more), as well as Tall Buildings (8 to 14 storeys), taking into consideration a site-specific assessment, including local contextual factors and the wider planning and public benefits offered by any such scheme.

As set out above, neither the Draft Local Plan nor the Changes to the Policies Map (Reg 19) identify locations for tall buildings, and this is inconsistent with London Plan Policy D9 and therefore not considered sound. It is requested that the Draft Local Plan and the Draft Policies Map is updated to clearly identify on maps all locations where tall buildings may be an appropriate, and the appropriate tall building heights. This must include the areas identified in Draft Policy CDH04, including Major Thoroughfares which includes the GNLP site.

#### **Draft Policy TOW01 Vibrant Town Centres**

Landsec supports the Council's aspirations to promote the vitality and viability of the Borough's town centre. However, Part D requires a sequential and impact assessment for replacement/re-provision of main town centre uses in out of centre locations. Landsec continue to request the policy and supporting text be amended to confirm that established locations are not required to undertake a sequential and impact assessment if there is no net uplift of on-site main town centre uses.

#### **Draft Policy CHW01 Community Infrastructure**

Landsec supports this draft Policy as currently worded which enables the enhancement of community infrastructure, such as the Lido located to GNLP, whilst also providing sufficient flexibility to provide a replacement facility, of better quality, off site. This approach will allow for appropriate development to come forward in the right places to meet the needs of the Borough and demands of the market. This Draft Policy is considered to be consistent with both national policy and the London Plan Policy S1.

### **Draft Policy CHW02 Promoting Health and Wellbeing**

Landsec continues to support LBB's ambition to promote the creation of healthy environments under Policy CHW02, and consider the redevelopment of GNLP provides opportunity to promote the creation of healthy environments and safe, accessible, sustainable and high-quality places as sought by this Policy. The initial masterplan and feasibility studies undertaken by Landsec in 2020 offer opportunity for comprehensive redevelopment of the site to introduce ecological and biodiverse landscapes, areas of public realm, high quality-built form with a range of uses and safe, legible connection to the neighbouring MOL. Landsec's vision for the site is set out in further detail in this later sections of this Letter.

### **Draft Policy TRC03 Parking Management**

Landsec welcomes Draft Policy TRC03 seeking car parking for non-residential uses, electric vehicle charging points and cycle parking for all uses in accordance with the London Plan standards.

With regard to car parking for residential uses, Landsec agree that the maximum car parking standards set out in Table 23 should be applied to each site with sensitivity to local circumstances, including parking stress, ownership of surrounding areas, and location and proximity to local services, in accordance with Supporting Para 11.12.2.

Landsec welcome acknowledgment that levels of car parking provision can also be reduced through the delivery of car club parking bays and pool cars which promote a more efficient use of parking spaces, set out in Supporting Para 11.12.9.

Landsec welcome the confirmation that up to 0.5 spaces per dwelling is to be allowed for developments within Opportunity Areas but consider this should be extended to the other locations identified for housing growth under Draft Policy GSS01 including Major Throughfares.

### **Draft Site Allocation no. 67 – Great North Leisure Park (Major Thoroughfare)**

Landsec continues to strongly support the allocation of the site for comprehensive or infill residential-led development.

As a means of context, GNLP sits adjacent to the Finchley High Road (A1000), just north of the North Circular. The 3.45 ha out of centre leisure park is largely rectangular in shape and is made up of large 'box' leisure units of approximately two to five storeys in height and associated surface car parking. The site currently comprises an eight screen cinema and indoor bowling complex, with ancillary restaurants at ground floor; Finchley Lido Leisure Centre, comprising a gym with indoor and outdoor pools; four linked units, comprising four restaurants (one with drive through

facilities); a small single storey building serving an onsite car wash; and surface car parking. Trees are present to the eastern boundary and a number of small street trees and hedges are dispersed throughout the car park. There are no statutorily or locally listed buildings on the site. Furthermore, the site levels have an approximate 5m fall in height across the site; from c. 76m AOD along the northern boundary to c. 71m AOD across the south.

The site is bounded to the north by additional leisure facilities, which are accessed via a shared mini roundabout off Finchley High Road and Summers Lane to the north. To the north east and east of the site are public playing fields, accessed from Summers Lane to the north. An area of Metropolitan Open Land (MOL) lies to the east of the site, and the Glebelands Wood Nature Reserve borders the site to the south. The site lies approximately 750m south of North Finchley Town Centre, which provides many local amenities.

#### Opportunities for development

The wider leisure industry is facing unprecedented challenges, particularly with respect to cinema, restaurant, indoor leisure uses and retail parks, and the competition offered by other locations (such as town centres) and online retailers. In this context there is considerable scope for a fundamental re-evaluation of what GNLP can offer and a greater opportunity for more comprehensive redevelopment than envisaged by the current draft allocation. Initial masterplan and feasibility studies were undertaken by Landsec in 2020 to ascertain the level of development potential on the site, taking into account the opportunity for comprehensive redevelopment.

A high-level meeting was held with senior planning and planning policy officers from LB Barnet on 20th May 2020 following the submitted representations on the Regulation 18 Draft of the LB Barnet Local Plan. At this meeting four architectural concepts for residential-led redevelopment of the site were presented and discussed, all of which demonstrated the potential to deliver circa 800 homes with a mix of other uses through the comprehensive redevelopment of the site. Landsec considers the concept which offers the widest range of benefits to the local area to be the Vale of Health, which is a specific approach to placemaking orientated around creating a health and wellbeing neighbourhood. This provides opportunity to develop a comprehensive residential-led mixed-use development which will fulfil the vision of the emerging Local Plan and bring forward much needed housing delivery. Landsec considers this development typology also offers opportunity to explore an appropriate and sustainable mix and quantum of non-residential uses and enables the re-provision of the lido.

There are three overarching principles that feed into the Vale of Health typology, which we consider closely align with the overarching aspirations of the Draft Local Plan:

- Connect the neighbourhood physically via access points and pathways, and visually to the surrounding area, and maximise the potential of orientation, aspect and views.
- Create an attractive place people will want to dwell and visit, through use of pedestrian friendly streets and public spaces (minimising vehicular movement), landscaping approaches, and active frontage animation.
- Use efficient building forms that successfully integrate residential uses with other uses and optimise residential quality.

Please find enclosed an illustrative masterplan and indicative scheme massing in relation to the Vale of Health concept. This illustrates the opportunity to provide high quality public and communal spaces with buildings set within these areas and sensitively responding to the MOL.

#### Proposed Uses

The draft allocation includes an indicative residential capacity of 352 units. This is not based on any feasibility studies and must only reflect the option of infill development and not comprehensive redevelopment. Whilst a partial infill scheme is possible at the site, there is an opportunity to create a more holistic and well considered scheme by revisiting the entire site which will also allow optimisation and best use of land, in accordance with London Plan H1 and SD7, and Draft Local Plan GSS12. As such there is a clear rationale to increase the indicative capacity from 352 units to circa 800 units through comprehensive redevelopment and it is requested that the site allocation be revised upwards to reflect the likely capacity, as evidenced by the initial masterplan and feasibility studies were undertaken by Landsec in 2020. This will ensure the allocation is sufficiently flexible to address both the infill and redevelopment options, and is considered a sound approach.

The allocation currently prescribes 60% residential floorspace with 40% commercial, leisure and community use floorspace. Landsec consider this approach of prescribing an explicit numerical split for land uses, without any supporting site-specific architectural feasibility work or analysis of the market demand, to be an overly restrictive and unsound approach.

The allocation should acknowledge that the quantum of development including the split between different uses will be shaped by demand and by the nature and quantum of uses present within the wider area including North Finchley Town Centre, which can fluctuate over the life of a 15-year Local Plan. In particular we are aware of proposals for regeneration of North Finchley town centre, and want to ensure that GNLP provides a complementary leisure offer, rather than competition.

The overall quantum of floorspace and the split between uses should be derived through an approach which is design-led and takes full account of market need and demand for this out of centre site, acknowledging that there is no planning policy protection on the loss of the existing retail and leisure uses, to ensure the proposed redevelopment creates a successful sustainable mixed-use place that makes the best use of land, as required by London Plan Policy GG2.

On this basis, we request that the policy is altered to read:

*"Proposed uses/ allocation: residential led scheme with commercial, leisure and community uses, with the quantum of floorspace to be determined through a design-led approach with regard given to need and demand"*

This approach will ensure that a scheme can come forward with an appropriate mix and quantum of uses, which can also be shaped in discussion with Officers and key stakeholders at pre-application stage. This approach also ensures the allocation retains sufficient flexibility to respond to any change in the market and/or in the specific needs of the immediate area and the wider Borough.

#### Site Requirements and Development Guidelines

Landsec continues to strongly support the statement that 'there is potential for comprehensive or infill residential development utilising space released by existing surface car parking, allowing



better integration into the surrounding residential environment for more efficient and sustainable use of space’.

Landsec supports the proposed guideline that proposals must reflect the context of a Major Thoroughfare and respond to the adjacent MOL. The Vale of Health development typology offers opportunity to introduce ecological and biodiverse landscapes, areas of public realm, high quality-built form with a range of uses and connection to the neighbouring MOL.

Landsec supports the acknowledgment in the draft allocation that proposals should include measures that contribute towards modal shift away from private car use to more sustainable means of transport. The site currently includes a large amount of car parking for the leisure facilities on the site. The Vale of Health development typology offers opportunity to significantly reduce vehicle trips associated with existing use and therefore benefit the wider existing road network, whilst also supporting future occupants to utilise public transport, walking and cycling, in accordance with Draft Policy GSS11.

## **Other Matters**

### First Homes

Between 7th February and 1st May 2020, the Government consulted on a new affordable housing product known as First Homes. First Homes is a scheme to provide homes for first-time buyers that are discounted by a minimum of 30% against the market value. On 6th August 2020, the Government published a summary of the consultation responses, and following the May 2021 Ministerial Statement, substantial changes to planning policy came into effect on 28th June 2021. Local Plans and Neighbourhood Plans that have submitted for Examination or reached publication stage before 28th June 2021 are not required to reflect First Homes policy requirement. While Para 5.2.4 of the Draft Local Plan acknowledges affordable housing may include First Homes, the Draft Local Plan Policy HOU01 does not provide any clarity of the Council’s intended application of this. It is requested that the Council provide further clarity on the application of First Homes within Draft Policy HOU01.

### NPPF 2021

The Draft Local Plan does not reflect the latest version of the NPPF, published in July 2021, including the revisions made in response to the Building Better Building Beautiful Commission Living with Beauty report. The changes include an expectation that all councils should develop a local design code. It is requested that the Council provide further clarity within the Draft Local Plan on its consistency with the NPPF.

## **Conclusion**

Overall we support the aims and objectives of the Barnet Draft Local Plan Regulation 19, and the allocation of the GNLP site for comprehensive or infill residential-led development. However, in its current form we do not consider all policies within the Draft Local Plan would satisfy the NPPF tests for soundness. In light of this, we request the following is incorporated ahead of the Draft Local Plan being submitted for Examination in Public:

- Consideration of the re-introduction of the housing targets as set out in the Regulation 18 version for Draft Policies BSS01, GSS01 and GSS11;
- Amendment to Draft Policy GSS01 and GSS11 to express the breakdown of figures for each location as a minimum in the same manner as the overall housing;
- Amendment to Draft Policy CDH04 to acknowledge that Major Thoroughfares should be considered as appropriate locations for Very Tall Buildings (15 storeys or more), as well as Tall Buildings (8 to 14 storeys);
- Amendment to the Draft Local Plan and the Draft Policies Map to clearly identify on maps all locations where tall buildings may be an appropriate, and the appropriate tall building heights. This must include the areas identified in Draft Policy CDH04;
- Amendment to the Draft Policy TOW01 to confirm that out of centre locations which have existing main town centre uses are not required to undertake a sequential and impact assessment if there is no net uplift of on-site main town centre uses;
- Amendment to Draft Policy TRC03 to acknowledge that up to 0.5 car parking spaces per dwelling may be acceptable to the other locations identified for housing growth under Draft Policy GSS01 including Major Throughfares; and
- The following amendments to Draft Site Allocation no. 67 – Great North Leisure Park:
  - The indicative residential capacity of 352 units should be revised to align with the studies undertaken and discussed with Officers to date which demonstrate the site has the potential to deliver circa 800 homes with a range of other uses (should the comprehensive redevelopment route be followed);
  - The prescriptive numerical split for land uses should be removed and the allocation acknowledge that the quantum of floorspace is to be determined through a design-led approach with regard given to market need and demand.

We would welcome the opportunity to be kept informed of progress of the document.

Yours faithfully



**Rachel Crick  
Director**

**For and on behalf of Avison Young (UK) Limited**

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# Illustrative Masterplan in relation to the Vale of Health concept



# Indicative scheme massing in relation to the Vale of Health concept



Scheme Massing from the south west



Scheme Massing from the south east