

Ref:

(For official use only)

**Barnet Draft Local Plan (Reg 19- Publication Stage)
PART B - Representation**

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

- Chapter 2 - Challenges and Opportunities, para 2.5.1 , pg.18
- Chapter 2 Challenges and Opportunities, 2.6 Environment, pg.18
- Table 3 – Strategic and Non-Strategic Policies, pg.27
- Chapter 3, Map 2 – Key Diagram, pg.31
- Chapter 4 – Growth and Spatial Strategy : Consistency of terminology of Opportunity Areas (OA) and Growth Areas (GA) – pg.32-80
- Chapter 4, 4.1 National and London Plan Policy Context, para 4.1.1, pg.33
- Chapter 4, Map 3 Brent Cross Growth Area and Map 3A Brent Cross West Growth Area, pg.44
- Chapter 4, 4.26 Major Thoroughfares/ POLICY GSS11 Major Thoroughfares
- Chapter 6, Policy CDH04 Tall Buildings, pg.129
- Chapter 11 - Table 23, Residential Car Parking standards, pg.254
- Statement of Common Ground

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

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

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

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.

LB BRENT REPRESENTATION

- **Chapter 2 - Challenges and Opportunities, para 2.5.1, pg.18**

LB Brent comments

For consistency and to be in general conformity with the London Plan, the town centre hierarchy should use consistent terminology as that set out in the London Plan town centre hierarchy.

Proposed modification

'Barnet's town centre hierarchy provides a strong, distinctive feature for the Borough economy. The variety of centres (~~regional~~, metropolitan, major, district and local) across the Borough...'

- **Chapter 2 - Challenges and Opportunities, 2.6 Environment, pg.18**

LB Brent comments

The council is supportive of the approach to the enhancement and restoration of the Brent Reservoir in Policy GSS02. It understands the challenges and the opportunities blue infrastructure can present. For consistency, it will be helpful to recognise the river tributaries (Welsh Harp/Brent Reservoir) at the beginning of the Plan in Chapter 2 Opportunities and Challenges under environment section.

- **Map 2 – Key Diagram, p.31**

LB Brent comments

The Council welcomes the recognition that Burnt Oak and Colindale/The Hyde are town centres that cross over the boundary into Brent and the identification of the West London Orbital which also crosses into the borough. This points to an understanding that there should be engagement between the two boroughs on an on-going basis on these matters.

The Council in its previous response to Reg 18 suggested greater clarity between the use of the terminology Opportunity Area and Growth Area, which at times are interchangeable or can mean different things. LB Barnet has considered this revision however, greater clarity is required. Para 3.4.4 refers to 'Brent Cross Cricklewood' as an Opportunity Area (which it is in the London Plan). The Key Diagram (Map 2) shows Cricklewood as a Growth Area (in orange based on the map key where Opportunities Areas are identified in yellow).

In addition, another minor suggestion to add '/' for consistency with the London Plan is suggested. The London Plan refers to the Opportunity Area as 'Brent Cross/Cricklewood'.

- **Table 3 – Strategic and Non-Strategic Policies, p.27**

LB Brent comments

The council notes that this table has been revised following Reg 18 consultation. NPPF Para 21 requires Plans to make explicit which policies are strategic policies. To support this, Para 20 has a list of criteria. Based on this criteria and further reference in NPPF paragraph 21/22/23 on strategic and non-strategic policies, LB Brent considers that some policies not identified as strategic policies are strategic.

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The list of policies below are considered as strategic matters as they set out an overall strategy for the pattern, scale and quality of development.

In line with the presumption in favour of sustainable development, strategic policies are also those that make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement of natural, built and historic environment. NPPF Para 21 also highlights that strategic policies address the strategic priorities and relevant cross-boundary issues.

LB Brent considers the following policies strategic policies based on NPPF Para 20/21/22/23.

Proposed modification

Strategic policies:

- Policy CDH01 Promoting High Quality Design
 - Policy CDH02 Sustainable and Inclusive Design
 - Policy CDH03 Public Realm
 - Policy CDH04 Tall Buildings
 - Policy TOW01 Vibrant Town Centres
 - Policy TOW04 Night –Time Economy
 - Policy CHW01 Community Infrastructure
 - Policy ECC02 Environmental Considerations
 - Policy TRC01 Sustainable and Active Travel
 - Policy TRC02 Transport Infrastructure
 - Policy TRC03 Parking management
- **Chapter 4 – Growth and Spatial Strategy : Consistency of terminology of Opportunity Areas and Growth Areas, pg.32-80**

LB Brent comments

The Council in its previous response to Reg 18 suggested greater clarity between the use of terminology of Opportunity Area (OA) and Growth Area (GA). LB Barnet has considered this revision however, greater clarity is still required. For example in Policy GSS01, under the subtitle part a) Growth Area: 'Brent Cross Cricklewood' is listed but referred to as OA. Following Policy GSS01, the title of para 4.9 says 'Brent Cross Growth Area'. However, within para 4.9, the term 'Brent Cross Cricklewood OA' is used. There is no explanation as to what 'Brent Cross Growth Area' is till para 4.10.3 where it breaks down 'Brent Cross Growth Area' into 3 parts: Brent Cross North, Brent Cross Town, and Brent Cross West (Thameslink).

There is further confusion as 'Policy GSS01 Brent Cross Growth Area' sets a housing delivery of 9,500. 'Policy GSS02 Brent Cross West Growth Area' sets a housing delivery of 1,800 homes. If Brent Cross West GA is part of Brent Cross GA, why does it have a separate capacity and not inclusive of the 9,500 homes? This needs to be set out in a clear format in 'Policy GSS01 Delivering Sustainable Growth' and consistent use of terminologies between the policies.

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In addition, In Policy GSS01, It lists 'Brent Cross West' and its housing target. However, the list does not acknowledge 'Brent Cross North' and 'Brent Cross Town'. In para 4.11.1, it mentions that Brent Cross North has a consent to deliver 800 new homes. Similarly, Brent Cross Town is delivering 6,700 new homes.

Proposed modification

- a) ~~Growth Areas~~ Growth and Spatial Strategic Areas (23,300 homes):
- Brent Cross / Cricklewood Opportunity Area (referred in the Plan as Brent Cross Growth Area) – 9,500 homes (Policy GSS02)
 - Brent Cross West Growth Area – 1,800 homes (Policy GSS03)
 - Brent Cross North – 800 homes
 - Brent Cross Town – 6,700 homes
 - ~~Cricklewood Town Centre~~ Growth Area 1,400 homes (Policy GSS04)
 - ~~Edgware Town Centre~~ Growth Area – 5,000 homes (Policy GSS05)
 - Colindale Opportunity Area (referred to as Colindale Growth Area in the Plan) – 4,100 homes (Policy GSS06)
 - Mill Hill East – 1,500 homes (Policy GSS07)
- b) District Town Centres – 5,400 homes (~~Policy GSS08~~)
- Barnet's District Town Centres (Policy GSS08)
- **Chapter 4 - 4.1 National and London Plan Policy Context, para 4.1.1, p.33**

LB Brent comments

GG2 Making the best use of land and GG4 Delivering the homes Londoners need are not policies and London Plan lists them as 'Good Growth Objectives'.

Proposed modification

London Plan

~~Policy~~ Good Growth Objective GG2 Making the best use of land

~~Policy~~ Good Growth Objective GG4 Delivering the homes Londoners need

- **Map 3 Brent Cross Growth Area and Map 3A Brent Cross West Growth Area, p.44**

LB Brent comments

For clarity and consistency, it will be useful to label this map as Brent Cross/Cricklewood Opportunity Area.

In addition, it will be useful to amend the map and add what site 7 and site 8 are within the map key. Marking the LB Barnet boundary, LB Brent boundary along with road name/landmarks will also assist in understanding the map and strategic importance better.

- **4.26 Major Thoroughfares/ POLICY GSS11 Major Thoroughfares**

A5 Edgware Road is one of the principal vehicular movement corridors for most Opportunity Areas and Growth Areas of Edgware, Colindale, Brent Cross and Cricklewood. This corridor also serves other areas recognised for development such as Burnt Oak and Colindale/The Hyde town district centres and West Hendon Estate renewal. Whilst reference appears to have been made to healthy streets throughout the Plan, it could be interpreted as focussing on streets within the developments. Para 4.26.6 refers to enhancement of routes and healthy streets initiative to a number of roads; however A5 Edgware has not been included in the list.

Policy GSS11 states: '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.' It does not include reference to the healthy streets for this section of the policy. Given the strategic A5 road with future major developments focused along, the policies should look into a wider strategic approach. It is currently dominated by traffic and has a poor quality public realm that would also benefit from the healthy streets initiative.

- **Chapter 6 - Policy CDH04 Tall Buildings, p.129**

LB Brent comments

Whilst understanding and supporting LB Barnet's desire for some flexibility in relation to the location of tall and very tall buildings, the Council is not sure that the policy is positively prepared and consistent with London Plan Policy D9 which does not appear to allow the flexibility Barnet's policy seeks. For example CDH04 does not provide sufficient clarity on the likely locations of very tall buildings and their potential height. The evidence base identifies some appropriate locations for very tall buildings. These places however are not adequately reflected in the policy and neither are the heights. To provide more certainty, and be consistent with the Brent locations identified for what would in Barnet be identified as appropriate for very tall buildings, it could perhaps be amended to: "The following locations are considered appropriate for Tall Buildings (8, etc). The following locations (list as set out in the Tall Buildings Study 2019) are appropriate for very tall buildings....."

- **Chapter 11 - Table 23, Residential Car Parking standards, pg.254**

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LB Brent comments

LB Brent commented on this previously noting that parking standards in low PTAL were relatively high compared to the draft London Plan. LB Barnet's Reg 19 draft Plan has reduced its standards consistent with London Plan's maximum car parking provision for an outer borough.

It is noted that LB Barnet has added a footnote to table 23 that states that *'Metropolitan and Major Town Centres to be Car Free~; and Up to 0.5 spaces per dwelling be allowed for developments within Opportunity Areas'*. Colindale Opportunity Area has a PTAL of 3-4. Cricklewood Opportunity Area has PTAL 4-6a. In Brent Cross Opportunity Area, the potential improvements to public transport offered by the West London Orbital station at Brent Cross West will increase PTAL levels. The footnote needs to be revised to exclude reference to OAs where PTAL is sufficiently high to support lower maximum standards, as the table sets out standards based on PTAL.

Proposed modification

~~Metropolitan and Major Town Centres to be Car Free~; and Up to 0.5 spaces per dwelling be allowed for developments within Opportunity Areas~~

- **To be agreed through Statement of Common Ground:**

LB Brent comments

The Council is looking forward to joint-working with LB Barnet on strategic matters. This has been highlighted in various section of the draft Plan. The Council feels it will be helpful to list those and looks forward to engaging with LB Barnet.

- Regeneration proposals for West Hendon and any future documents relating to the Brent Reservoir and strategies for the adjoining open spaces including West Hendon Playing Fields and Woodfield Park Sports Ground. No reference made.
- Brent Cross West (Thameslink): The 24-hour pedestrian link across the railway lines and other potential improved pedestrian routes between it and the A5 Edgware Road which will open up access to neighbourhoods in LB Brent to the west. Reference made in para 4.13.1.
- POLICY GSS03 Brent Cross West Growth Area - The Brent Cross West Growth Area adjoins the Staples Corner Strategic Industrial Location in LB Brent which is identified in the Brent Local Plan as a growth area for industrial intensification and potential housing delivery. The Council will seek joint-working to develop plans for growth in cooperation with Brent Council and ensure that a coordinated masterplan for the area is prepared planning framework for this area potentially through an Area Action Plan or Supplementary Planning Document. Reference made in Policy GSS03.

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- POLICY GSS04 Cricklewood Growth Area - The Council will seek to be engaged at the preparation stage of the planning framework for this area with LB Brent/LB Camden/LB Barnet.
- All developments on sites within the Brent Cross West Growth Area and the adjoining Staples Corner Growth Area in Brent will be expected to contribute proportionately towards the cost of delivering the infrastructure improvements necessary to support this growth. Reference made in para 4.16.8.
- Agree a scheme with TfL/ LB Barnet/ LB Brent for improving the junction between the A406 and the A5 at Staples Corner. The existing strategic highway network in the area is already congested with the junction at capacity at peak times. Any additional development capacity will therefore be significantly restricted until a scheme for the improvement of this junction is secured. Reference made in para 4.16.7.
- Policy GSS06 Colindale Growth Area - Colindale town centre is Brent's priority town centres and falls within LB Brent and LB Barnet. Ensure that LB Brent are informed of any intention in future to produce new area planning frameworks affecting Colindale.
- Policy GSS08 Barnet's District Town Centres - The Council welcomes the identification of Burnt Oak main town centre as a priority location for investment and revitalisation. Ensure engagement with LB Brent/LB Barnet/LB Harrow in any initiative to consider a more co-ordinated way of addressing the future of the town centre as a whole
- Policy GSS11 Major Thoroughfares - A5 Watling Road is recognised as a major thoroughfare where parts of it has been identified for tall buildings in LB Brent's Local Plan. The Council would be willing to engage with LB Barnet at appropriate times in the production of the A5 tall buildings study that LB Barnet has indicated that it is looking to progress to ensure a complementary approach to tall buildings along the A5.
- Policy CDH04 Tall Buildings and Tall Buildings update (supporting document) – The council supports the policy in relation to high quality design. It recognises the identification of the A5 as 'suitable for tall buildings in some sections'. As set out in response to Policy GSS11 it would welcome suitable engagement in further iterations of the strategy for the A5.
- Protected views - Two protected viewing corridors toward Harrow on the Hill pass through Brent from Barnet. These include views from Millfields Park, and Golders Hill Park. LB Brent and LB Barnet have agreed a statement to establish a common ground on the designation of these corridors. In the statement, it was agreed that while Barnet progresses its Reg 19 Local Plan, it will review the Locally Important Views and the impact they have on our neighbouring boroughs. LB Barnet recognises that given the impact of existing tall buildings on these views, it will be important to assess the potential impact of any proposed tall

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building. As part of our Duty to Cooperate responsibilities, we look forward to discuss the two views from Golders Hill Park and Mill Field toward Harrow on the Hill to gain further certainty on their direction, extent and harm that development in Brent should seek to avoid.

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

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

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

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

The Council does not wish to participate in the hearing session, as the matters raised above will be resolved through the Statement of Common Ground. However if LB Barnet considers that Brent's presence at the sessions will be helpful, then the Council is happy to participate.

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.

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Signature



Date: 09/08/2021