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Our ref: TfL/CD/BH – LBB LP Reg 19

Your Ref: -

Local Plan Consultation
Planning Policy Team
London Borough of Barnet
7th Floor
2 Bristol Avenue
Colindale
London
NW9 4EW

Transport for London
Commercial Development

7th Floor, Palestra
197 Blackfriars Road
London
SE1 8NJ

By Email: forward.planning@barnet.gov.uk

Dear Sir / Madam,

Consultation on Barnet's Draft Local Plan (Reg 19) Submission - TfL Commercial Development Response

Thank you for providing the opportunity to comment on the Draft Local Plan Regulation 19 submission version.

Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning will provide a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

Background

TfL CD is working with the Council to deliver mixed-use development and new homes across the borough. Across our portfolio of London sites, TfL CD will be delivering 50% of new homes / habitable rooms as genuinely affordable housing in a range of tenures. In Barnet, our schemes will range from policy-compliant 35% affordable housing and up to 100% – please see below.

Our partner Kuropatra is nearing completion of 97 new homes at Beechwood Avenue (50% affordable housing) and Pocket Living is due to start work shortly on building 86 new homes at our site to the west of Woodside Park station (100% affordable housing – discounted market sales). We have received planning permission to build 313 new homes as part of a comprehensive development which delivers a new station ticket hall building at Colindale Avenue (50% affordable housing). We will be seeking partners for

housing development opportunities at High Barnet station and on land to the east of Dollis Park within the next six months. .

In addition, we have a portfolio of major sites that we will be looking to develop in years to come – focussed on delivery of optimal, high quality housing and public realm around stations – in areas such as Edgware town centre, Finchley Church End, East Finchley and Mill Hill.

All of TfL CD's projects are focussed on delivering optimal, high-quality housing, within schemes that relate to and strengthen their neighbourhoods, which make places that people are proud to live in, and which are founded on transparent engagement and best practice.

As one of the biggest public sector landowners in the borough, TfL is a very important partner to deliver high-quality housing in the borough and we have a strong appetite to continue working with the Council to achieve this.

TfL CD has previously submitted representations on the emerging Local Plan at the Regulation 18 Issues and Options stage.

TfL CD Representations

As we have previously stated, TfL CD broadly supports the draft Plan's vision for sustainable 'good growth', including the delivery of a significant amount of new housing throughout the plan period to meet LBB's housing needs. In addition, we consider that the draft Plan, taken as a whole, is generally legally compliant, sound and compliant with the duty to cooperate. However, we do have a number of representations in respect of specific policies, supporting text and site allocations.

National Planning Policy Framework

The Local Plan will need some redrafting to refer to the July 2021 version of the NPPF. In particular for references to: the use of Article 4 Directions; the use of masterplans, design guides or codes (including the National Design Guide and National Model Design Code) to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community; the significant weight to be given to outstanding or innovative designs which promote high levels of sustainability; improved street design; the emphasis on incorporating trees in new developments and streets; and the faster delivery of public service infrastructure.

Chapter 3 - Barnet's Vision and Objectives

TfL CD continues to support the proposed 'vision' and, in particular, directing growth to the most sustainable locations with good public transport and sustainable transport choices. In particular we support the added references to good, sustainable growth. However, **we would still suggest adding specific references to good design**, which is important to ensuring the Barnet continues to be *"a place where people choose to make their home"*. References to good design should also be included in para 3.2.2 which sets out key objectives linked to the vision; this would reflect updated para 8 of the new NPPF which highlights the importance of *"well designed, beautiful and safe*

places” to achieving sustainable development. This could potentially be incorporated within the last bullet point of para 3.2.2.

We note the significant reduction in the Council’s housing delivery ambitions; the target to deliver a minimum of 46,000 new homes set out in the Reg 18 version of the draft Plan has been reduced to 36,000 during the period to 2036. This remains an ambitious target, requiring an average delivery of 2,364 new homes per annum, which accords with the London Plan 10 year housing target for the borough [London Plan, Table 4.1]. TfL CD can make significant contributions towards the Council achieving this and also your objective to increase the supply of affordable home ownership and rental options.

The targets set out in Tables 4.1 and 4.2 of the London Plan should be treated as minima (see paragraph 4.2.5 of the London Plan) and the Mayor encourages boroughs to exceed these where possible while taking into account other policies within the development plan. Exceeding the borough’s housing target would make an additional contribution to meeting objectively assessed housing needs, addressing housing affordability issues, and making the most of opportunities to regenerate and redevelop brownfield land in the borough.

POLICY BSS01 Spatial Strategy for Barnet

TfL CD continues to support the objectives of this policy to deliver new homes (albeit the target is now reduced to accord with the London Plan), the other growth objectives for commercial and retail floorspace across the town centres, provision of parks, sports and recreation facilities, and the objective to minimise contributions towards climate change.

We support the directing of development to the most sustainable locations with good public transport connections and provisions for active travel. However, in addition to the specified Opportunity Areas, Growth Areas and District Town Centres, the policy should make clear that outside of these areas **the design-led approach should also be used to maximise the development potential of sites and make the best use of land, particularly on sites which are within 800m of a station or town centre boundary or with PTALs of 3-6**. Such an approach would conform with London Plan policy H1 (Increasing housing supply) and would therefore be both ‘sound’ and ‘legally compliant’. We would suggest that the last sentence of policy BSS01 (para C) could be modified as follows:

*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, **and particularly within 800m of a station or town centre boundary and / or areas with PTALs of 3-6 as a result.***

This would bolster the Council’s approach to ensuring that development takes place at optimum densities in the most sustainable locations in order to minimise carbon and air quality impacts, reduce congestion and encourage sustainable and active transport choices.

Key Diagram

Linked to our comment immediately above, and to ensure that growth and new housing can be focussed in all accessible locations, particularly those with good public transport connections, **we would suggest that consideration is given to drawing indicative 800m zones around stations and town centre boundaries.**

Chapter 4 – Growth and Spatial Strategy

TfL CD supports the Council’s approach, in para 4.4.5, to provide a supply of sites for up to 36,000 new homes in order to maximise the prospects of meeting the London Plan and draft Local Plan’s targets for delivering a minimum of 2,364 new homes each year.

POLICY GSS01 Delivering Sustainable Growth

TfL CD supports directing housing growth to the Growth Areas (including Colindale, Edgware and Mill Hill), District Town Centres (including Finchley Church End), at existing and major new public transport infrastructure and at other car parks.

In the context of the current borough housing target in the recently adopted London Plan, we are generally supportive of the housing targets for the Growth Areas, District Town Centres, and Existing and Major New Public Transport Infrastructure (subject to our comments below on developing at TfL stations and environs including car parks). However, as above, we consider that **the housing targets should be expressed as minima**, ie.

- a) *Growth Areas (at least 23,300 homes):*
etc

We consider that the indicative capacity of *at least* 5,000 new homes at Edgware (where TfL CD is partnering Ballymore to bring out transformative change in the town centre) is achievable. We are also happy with the figure of *at least* 4,100 new homes at Colindale, which we assume to include the 313 new homes granted planning permission at Colindale Station in 2020. And likewise *at least* 1,500 new homes at Mill Hill which we assume to include the min 127 new homes in Site Proposal No. 47.

We note the reduction in capacity for District Town Centres from 6,100 in the Reg 18 version of the Draft Local Plan to 5,400 in the Reg 19 version. The Council will need to ensure that the reduced figure still optimises opportunities for the delivery of housing in these highly sustainable locations.

We also note, with some concern, the significant reduction in capacity for “*London Underground and Network Rail stations and environs, including car parks*” – from 1,000 new homes in the Reg 18 draft to just 450 in the Reg 19 draft. The development of such sites will not only regenerate and make much better use of this under-used, brownfield land, but will also help to encourage more sustainable and active transport choices in the most accessible locations, in accordance with the Mayor’s Transport Strategy (MTS) and London Plan eg. policies SD7 (Town centres: Development Principles and Development Plan Documents) and H1 (Increasing Housing Supply).

We consider that the Reg 19 version of the draft Local Plan underestimates the capacity of these sites. We calculate that our car park sites in the borough have the capacity to deliver a greater number of new homes over the lifetime of this Local Plan. Based on the draft Reg 19 Local Plan Annex 1 Site Proposals figures, TfL's "stations and environs, including car parks" have the potential to deliver a minimum of:

Site No.	Site	Indicative homes
24	East Finchley Station Car Park	135
28	Edgware Underground and bus stations	2,317
30	Finchley Central Station	556
44	High Barnet Station	292
47	Mill Hill East Station	127
53	Alum Way	600 (assume up to 200 could be collocated with transport infrastructure on TfL land)
55	Woodside Park Station East	95
56	Woodside Park Station West	356
-	Colindale Station, car park and adjoining land	313
	TOTAL	4,391

Over the lifespan of the draft Local Plan, this may be an underestimate as there is also potential for new homes at other sites in TfL's portfolio such as Golders Green station (see below).

However, this demonstrates the estimated capacity for housing delivery on TfL sites comprising "London Underground stations and environs, including car parks". Even if we account for potential double counting by discounting the station / car park sites in Growth Areas (ie. Edgware Underground and bus stations, Colindale Station and Mill Hill East station) and District Town Centres (ie. East Finchley Station car park and Finchley Central station), the highlighted sites in the table above could deliver 943 new homes. We do not know the capacity of Network Rail sites, which would also need to be added, but we suspect it may take the total to above 1,000.

As the draft Reg 19 Local Plan underestimates housing delivery on these sites, we consider that the figure of 450 homes does not optimise housing delivery on highly sustainable sites. **It should remain as at least 1,000 homes as previously specified in the Reg 18 draft.** We look forward to continuing to work with the Council in order to realise the true potential of these sites.

TfL CD continues to support the development of 'small sites' and our scheme at Beechwood Avenue should be completed shortly to provide 97 new homes. We also have a number of other 'small sites' in the borough, including on the North Circular which will reinstate homes on derelict sites, therefore improving the environment and townscape, as well as providing much-needed additional family homes.

POLICY GSS05 Edgware Growth Area

TfL CD welcomes Edgware Town Centre being identified as an opportunity for regeneration and intensification and supports this policy, **subject to the housing target being expressed as a minimum** ie:

At least 5,000 new homes;

Please see our more detailed comments below in respect of Site No. 27: Edgware town centre and Site No. 28: Edgware underground and bus stations.

POLICY GSS06 Colindale Growth Area

TfL CD supports the general ambitions for growth within the Colindale Growth Area and also the specific reference to improving Colindale Underground station, including seeking developer contributions in order to help enable this. Please note that the improvements do not comprise a “*new station*”, but a new ticket hall building (the platforms and much of the station infrastructure below ticket hall level will remain). Therefore, we suggest the following amendment to the policy for clarification:

*New Colindale Underground ~~Station~~ **ticket hall building** ~~station~~ with step-free access **to the platforms** and sufficient gate capacity ... etc*

TfL CD hopes to soon be seeking a new development partner to deliver the 313 new homes permitted following the grant of planning permission on 10 March 2020 or an alternative scheme. To reflect this, and confirm the delivery of much-needed new homes in a highly sustainable location adjacent to the station, we suggest a further amendment to the policy in respect of the second mention of the station:

*Land at Colindale Underground Station will be redeveloped to provide a new, higher capacity, step-free access station **ticket hall building** that incorporates cycle parking **and new homes**;*

POLICY GSS07 Mill Hill East

TfL CD appreciates the Council’s support to deliver good growth at Mill Hill East Station. **However, as we have previously said, given the good level of public transport accessibility (PTAL 3 and adjacent to the underground station) we would suggest that ‘urban’ rather than ‘suburban’ growth would better optimise the opportunity to deliver new homes close to the station.** Indeed, the reference to “*good suburban growth*” is confusing in the context of the cited Millbrook scheme which comprises multi-storey apartment buildings presenting more of an urban than suburban face to Mill Hill East. We would suggest that this policy is reconsidered in order to clarify that development at and close to the station would be expected to be of a scale that, subject to a design-led approach, would optimise development potential and density in this accessible and sustainable location.

As suggested above, **all housing targets should be expressed as minima** in order to provide flexibility as and when housing targets change as a result of updated targets at a national and / or London Plan level during the lifetime of the Local Plan.

POLICY GSS08 Barnet's District Town Centres

TfL CD supports the development of new mixed-use housing schemes in sustainable locations within the Town Centres and recognition of their vital role in delivering sustainable growth and post-Covid recovery. In particular, the focus on the main town centres such as Finchley Central and Golders Green is sound as they are adjacent to railway stations providing access to central London and elsewhere. In addition, we strongly support the requirement to optimise residential density (b) in order to make the most efficient use of brownfield land and take advantage of high levels of public transport accessibility.

As above (under GSS01) we note the reduction in capacity for District Town Centres from 6,100 in the Reg 18 version of the Draft Local Plan to 5,400 in the Reg 19 version. The Council will need to ensure that the reduced figure still optimises opportunities for the delivery of housing in these highly sustainable locations.

We also reiterate that **all housing targets should be expressed as minima** in order to provide flexibility as and when housing targets change as a result of updated targets at a national and / or London Plan level during the lifetime of the Local Plan.

In our Reg 18 representations we pointed out that it is not clear what is meant by the requirement that *proposals “do not have a negative impact on areas outside of the town centre”* (d). This has not been updated and as presently worded it is imprecise, unclear and, in our view, unsound. Therefore, **we suggest, again, that clarification is provided as to what types of impacts are meant to be avoided.**

We also strongly support the requirement to support sustainable travel and provide parking at the minimum required standard, including at zero provision where appropriate. This accords with the MTS and London Plan policy T6 (Car Parking). However, it is not clear what is meant by the reference to car parking *“established standards”* in (g). **We suggest that this is replaced by a specific reference to the London Plan as setting standards for car parking.**

We appreciate the additional support for active travel modes and the Healthy Streets Approach which has been added since Reg 18.

We would also, again, urge the Council to consider extending the town centre boundary for Chipping Barnet (Map 2 – Key Diagram) to include High Barnet Station as there are clear transport and interchange links between them (please see below).

POLICY GSS09 Existing and Major New Transport Infrastructure

TfL CD strongly supports the recognition that:

“Public transport nodes, particularly of underground and over-ground rail infrastructure, provide locations of higher PTALs that can support significant intensification and growth.” [para 4.24.1]

Much of TfL's programme for development in the borough is on this basis and it is an approach this is supported by both the London Plan and NPPF.

We also strongly welcome the recognition, in accordance with the Draft Growth Strategy, that station car parks offer opportunities for redevelopment through utilising the high PTALs and other potential site characteristics such as town centre locations, and that the Council's expectation is that such sites will be developed primarily for residential uses [para 4.24.5].

Para 4.24.7 and the policy itself lists a number of stations that are *"not linked to a town centre which are expected to support development"* such as Mill Hill East, New Southgate etc. Since the Reg 18 version of the draft Local Plan, Woodside Park has been removed from this list. **It should be reinstated because it provides two housing development opportunities on TfL land [Annex 1, Site Nos 55 and 56] with capacity to deliver 451 new homes, one of which already has planning permission.**

In this context, we also note that High Barnet station is not within a town centre boundary, although it is adjacent to Chipping Barnet town centre and our proposals will seek to strengthen links between the station and Chipping Barnet District town centre (as well as nearby Underhill). **As above, and as we said at Reg 18, we would urge the Council to consider extending the town centre boundary to include High Barnet Station as there are clear transport and interchange links between them. Notwithstanding, we reiterate that policy GSS09 should prioritise all public transport nodes for the optimal development of new homes. If High Barnet is not included within Chipping Barnet town centre then it should be recognised as a prime, well-connected brownfield site, and specifically identified in draft policy GSS09 as a growth area for new development.**

We appreciate that you have changed your approach to the re-provision of commuter car parking on these sites since Reg 18. You now say that the level of station car parking provision should be assessed in light of encouraging the use of public transport and active modes of travel. This should enable our schemes to reduce commuter car parking, enabling us to optimise development opportunities and housing delivery and, importantly, to contribute towards meeting other important objectives of the MTS and London Plan including: the target for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041; 'vision zero' to eliminate all deaths and serious injuries on London's transport system; and the Healthy Streets Approach.

However, we do not support the final sentence of the policy and, in particular, the reference to *"multi-storey design"*. We are likely to focus car parking re-provision on a much smaller number of spaces for people with disabilities including 'blue badge' holders. **The provision of multi-storey car parks is unlikely to be acceptable from a design point of view (often resulting in full or partial blank facades) and would often jeopardise scheme viability (especially for our schemes with very high affordable housing provision), particularly when fully or partially underground.** Therefore, we suggest the following changes to the last sentence of the policy:

Existing provision must be assessed and *if there is a demonstrable need to replacement some car parking, it may be supported through a more land-efficient design approach ~~such as a multi-storey design.~~*

POLICY GSS11 Major Thoroughfares

TfL CD supports redevelopment of sites along main road corridors, particularly for housing delivery and **at a density / scale that is optimised according to public transport accessibility** (as well as surrounding context etc). We appreciate the Council's commitment to *"work with TfL and Highways England to help deliver appropriate sites"*.

However, we note that support for development on the A406 North Circular is not as strong as it is for some other major roads through the borough. In particular, para 4.26.6 says that the A406 North Circular *"could potentially be enhanced"* which we consider to be unclear. **We would suggest that this paragraph is strengthened to provide a clear presumption in the Local Plan in favour of the redevelopment of unused / underused sites in suitable locations on the A406 (subject to the usual planning, heritage and environmental considerations, of course).** TfL has a number of sites along the A406 North Circular that were originally acquired by the DfT for road-widening projects which were never brought forward. Beechwood Avenue is an example of one of these sites that is successfully being brought forward for housing development alongside the A406. Our site at Brentmead Place is another example, where the Council has made a draft site allocation for housing development (Site No. 31). We have other small sites along the A406 where houses were demolished after being vandalised and / or burnt; their redevelopment with replacement homes will have significant townscape and environmental benefits as well as providing much-needed additional family-sized housing in the borough. They are also in a sustainable location within easy walking distance of Brent Cross underground station. A clear planning position in the Local Plan will help us to market these development opportunities through the GLA 'Small Sites' programme and secure their redevelopment.

In addition, it should be made clear that *"substantial public transport investment"* will not be required in all cases (particularly where sites are in easy reach of existing facilities or too small) and that contributions should be proportionate to the scale of development.

Therefore we suggest that para 4.26.6 is amended as follows:

*Within Barnet there are routes that are managed by Transport for London (TLRN) **along parts of** which could potentially be **suitable for housing delivery (particularly reinstating former homes and infill development).** ~~enhanced, but~~ **In some locations it will require more substantial public transport investment (proportionate with the scale of development) alongside the healthy streets initiatives, to unlock their capacity for growth. These include:***

- *A406 North Circular;*
- *A1 Great North Way/ Watford Way; and*
- *A41 Edgware Way / Watford Way / Hendon Way.*

POLICY GSS12 Car Parks

TfL CD supports the re-development of publicly accessible surface level car parks for residential and other suitable uses

Chapter 5 – Housing

Policy HOU01 Affordable housing

TfL CD notes the policy and will always look to achieve this in the borough except in cases when scheme viability challenges would make it impossible. We appreciate the changes that have been made to reflect our comments at Reg 18.

Chapter 6 - Character, Design and Heritage

TfL CD generally supports the policies in this chapter which aim to create sustainable, well designed, safe and secure developments which respond appropriately to context and deliver Healthy Streets.

We note the recent publication of the July 2021 revised version of the NPPF and National Model Design Code which the Reg 19 draft Local Plan may need to be updated to respond to.

Policy CDH04 Tall Buildings

TfL CD maintains its concerns in respect of the tall buildings policy because the issues raised in our Reg 18 representations have not been addressed.

It is proposed that ‘very tall’ buildings will only be permitted in exceptional circumstances. One very limited example of exceptional circumstances is provided (appropriate siting within an Opportunity Area or Growth Area) and we consider that this should be extended. For example, **the significant public realm and townscape improvements sought by the Council will only be secured at our Finchley Central site (see below) if an appropriate and viable scale of development (likely to include very tall buildings) can be achieved.**

In addition, we believe that a **design-led approach** to ‘very tall’ buildings would be appropriate, in accordance with London Plan policy D9.

Chapter 11 Transport and Communications

Policy TRC02 – Transport Infrastructure

Our colleagues in TfL Spatial Planning will comment on this draft policy. However, consistent with our comments above in respect of Colindale station, we would suggest that a)iii is amended as follows:

*A new underground station **ticket hall building** and enhanced public transport interchange at Colindale;*

Policy TRC03 – Parking Management

We note that Table 23 (Residential Car parking Standards) now broadly accords with the London Plan.

We welcome the changes to TRC03 para b) following our Reg 18 representations in respect of CPZs. However, **we consider that the text should be clear in respect of who decides whether a CPZ is required.** In addition, the introduction of a CPZ does not fall within the control of a developer and this objective has to be driven and promoted by the Council. Therefore, we suggest the following amendment to reflect this:

Where development is proposed, and the Council decides that ~~it is deemed~~ a CPZ is necessary then the developer will need to make a contribution towards the implementation and monitoring of the CPZ in order that the Council can seek to ensure that it ~~is should be~~ in place within the surrounding area of the development before occupation. ~~A~~ The developer contribution towards the implementation and monitoring of the CPZ will be agreed as part of the planning permission.

Annex 1 – Schedule of Site Proposals (Allocated Sites)

Site No. 6: Watling Ave car park and Market, Burnt Oak

TfL CD appreciates the addition of the reference to improving interchange and contributing towards achieving station step free access.

Site No. 9: Colindeep Lane (adjacent to Northern Lane), Colindale

We note that site capacity has been reduced from 138 to 128 new homes since the Reg 18 consultation. Please could you let us know the reason for this.

Site No. 24: East Finchley station car park, East Finchley

We appreciate the changes that have been made to address our concerns. However, **we would suggest changes to the “Proposed Use” to delete the references to percentages (which may constrain the optimisation and delivery of new housing and development) and to be consistent with the approach to re-provision of commuter car parking on TfL sites (and therefore sound):**

~~70%~~ residential floorspace and ~~30%~~ commercial uses (E Class), public realm including station drop-off and ~~limited commuter public~~ car parking

The “Justification” currently (and presumably erroneously) infers that development of this site would enhance car parking on the site. That would not be TfL’s intention and the “Justification” must be amended. We suggest:

In this highly accessible town centre location the car park is a low intensity use; the potential for higher density usage including residential would be in line with

the national and London Plan policy approaches to enhance the town centre and ~~reduce commuter public~~ car parking based on adjacency to the underground station and local bus routes, and provisions to encourage active modes of travel.

And finally, the last sentence of the “Site requirements and development guidelines” must also be amended:

Public car parking requirements must be assessed ~~and if there is a demonstrable need for limited replacement of some car parking, it may be supported through a more land-efficient design approach and should include spaces and re-provided as needed, and access ensured~~ for people with disabilities.

Without these amendments, we do not consider that this site allocation would accord with the MTS or London Plan.

Site No 25: East Finchley substation, East Finchley

We appreciate the changes that have been made to address our previous concerns.

The “Development timeframe” should be reduced to five years. The site has been acquired by a local developer who has commenced local community engagement with a view to submitting a planning application soon for mixed residential / commercial redevelopment.

Site No. 27: Edgware town centre, Edgware; and Site No. 28: Edgware underground and bus stations, Edgware

TfL owns a small amount of land within Site No 27 and all of the land within Site No.28.

TfL CD has been working with Ballymore, the owner of the Broadwalk Shopping Centre, whose landholdings comprise the majority of Site No.27, to look at a comprehensive development across both sites. We have undertaken an initial feasibility study covering both sites to inform this. As previously stated, TfL CD welcomes allocation of these highly accessible, brownfield, town centre sites for housing-led, mixed-use development.

Separate allocations

As set out in our representations to the Reg 18 consultation, **given these two sites comprise a majority of the area within the Town Centre and their redevelopment would have a huge positive impact on the function and nature of the Town Centre, it is considered that they should be incorporated into one site allocation.** This would reflect the need for a comprehensive approach to development on both of these adjacent sites including the best disposition of transport infrastructure and improved interchange, new homes, retail, and other commercial and community facilities. Given that both landowners are working in partnership, a separation upon ownership lines is therefore arbitrary.

Site capacity figures

As set out in our representations to the Reg 18 consultation, we are surprised that the methodology for calculating site capacity figures is based on the 2016 London Plan Density Matrix. Given the 2021 London Plan replaces the density matrix with a design-led approach, the methodology used in your Reg 19 consultation is no longer appropriate. We therefore suggest that the indicative residential capacities are given as minimum figures:

Site 27: Indicative **minimum** residential capacity: 2,379

Site 28: Indicative **minimum** residential capacity: 2,317

Uses as a percentage of floorspace

As set out in our representations to the Reg 18 consultation (and in connection with other draft allocations above), no detail has been provided as to how the percentages have been calculated; the only reference to the use of a % for non-residential uses is in paragraph 6.3.3 of this Site Selection Background Report and this only refers to an assessment having been carried out but does not provide any details of this assessment. **The use of percentage figures for such large sites that are required to deliver over 4,500 homes is an overly simple approach which may constrain the optimisation and delivery of new housing and development.** Further, requiring Site 27 to deliver 25% non-residential uses and Site 28 to deliver 30% non-residential uses would be difficult to monitor and assess considering that a comprehensive development which optimises uses across both sites will come forward. Again, as set out in our previous representations, it is suggested that, for more complex and strategic sites of this nature, these site allocations remove reference to the % and wording is updated along the following lines:

“Proposed use type/s: residential with ~~30% mixed uses (transport, retail, office and community)~~ transport and town centre uses to strengthen the high street including retail; food and beverage; leisure; office; community and public realm / open space.”

Site No. 30: Finchley Central Station, Finchley Church End

We appreciate the changes that have been made to address our previous concerns. However, we note that a number of matters have not been addressed in the updated allocation.

The site address is incorrect; in particular the reference to Squires Lane. It should be amended, we would suggest:

~~Squires Lane~~ / Regents Park Rd / Chaville Way / Nether St / Station Road / Crescent Rd St, Finchley N3 (land adjacent to railway ~~verges and airspace above~~ tracks and Finchley Central station)

As we have previously said, the scale of development sought on this challenging site, together with public realm, amenity spaces and other significant public benefits, can only be achieved through the development of one or more very tall building (15 storeys

+) in addition to tall buildings (eight storeys +). This would accord with London Plan policies and the town centre, urban location is clearly appropriate for this scale of development. **Therefore, the allocation should include sufficient flexibility to enable provision of both tall and very tall building/s.**

The “Proposed uses” still includes reference to:

50% residential uses with 50% retained transport infrastructure, commercial uses and car parking

We would prefer for the reference to percentages to be removed. However, if retained, it must be clarified that this refers to site area (not the floorspace provided within new buildings) and that it is an approximate figure only. As previously stated, this might be achieved in terms of site area, which includes underground railway tracks, the station and associated operational land and buildings. However, it would be neither desirable or achievable in terms of floorspace and therefore this needs to be clarified.

In addition, as stated above, it is not TfL’s intention to provide significant amounts of car parking on the site, either for commuters or new residents.

Therefore, we suggest an amended “Proposed Uses”: The text in [square brackets] would not be needed if reference to percentage is removed.

[Across the site: approximately 50%] residential uses with [approximately 50%] retained transport infrastructure, commercial uses and limited commuter car parking reflecting the site’s highly accessible location and encouraging the use of public transport and active modes of travel.

This clarification would be ‘sound’.

Site No. 31: Brentmead Place, Golders Green

TfL CD appreciates the amendments made in response to our Reg 18 representations.

Site No. 44: High Barnet Station, High Barnet

TfL CD appreciates the amendments made in response to our Reg 18 representations.

We will be seeking a development partner to deliver our housing-led scheme on this site later in the year and intend to submit a planning application later in 2022. Therefore, **the “Development timeframe” should be brought forward to the next five years.**

In our view **the description of “Proposed uses / allocation (as a proportion of floorspace)” is currently unsound because it is unclear and unfeasible.** As currently written, it suggests that 25% of the floorspace of the development should be provided as “commercial uses”; *it is not clear whether the “public realm and public car parking” also falls within the 25%. Certainly the provision of 25% for “commercial uses” would be unfeasible, would compete with the designated high street and would not*

accord with officers' pre-application advice and Council aspirations. It is TfL's intention to provide a mix of uses on the site which delivers the housing that Barnet needs and commercial floorspace that is complimentary to the high street at Chipping Barnet (and also Underhill). Therefore we propose the following amendment to the "Proposed uses":

~~75% residential-led with floorspace with 25% commercial uses, public realm and limited commuter public car parking reflecting the site's highly accessible location and encouraging the use of public transport and active modes of travel. Designated within UDP (2006) as Site 26 supporting B1 uses, hotel and leisure.~~

We have also deleted the reference to the UDP as it is out-of-date and no longer relevant.

Site No. 47: Mill Hill East station

TfL CD appreciates the amendments made in response to our Reg 18 representations. However, we would suggest changes to the "Proposed Use" to be consistent with the approach to re-provision of commuter car parking on TfL sites (and therefore sound):

~~"60% residential floorspace residential-led with 40% retained rail infrastructure and limited commuter car parking reflecting the site's accessible location and encouraging the use of public transport and active modes of travel."~~

Site No. 50: Watford Way and Bunns Lane

TfL CD appreciates the amendments made in response to our Reg 18 representations.

We understand that our colleagues in Operational Property are also looking at an option to use this site for transport operations, which should be referred to in the site allocation to provide flexibility for housing or transport operations or a combination of both.

Site No. 53: Allum Way, Totteridge

TfL owns a substantial part of the allocated development site, including the station car park, bus standing and depot to the north.

Need for additional operational facilities

As set out previously, London Underground (LU) is assessing the need for additional train stabling across the Northern Line network to facilitate upgrade works. At the present time, LU is investigating requirements and locations and therefore the exact extent of the additional operational facilities required on the site have not yet been determined. As such, safeguarding is necessary as per London Plan Policy T3 which states that:

"Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and

expanded public and active transport system to serve London's needs, including by

...

"2) identifying and safeguarding new sites / space and route alignments, as well as supporting infrastructure, to provide necessary strategic and local connectivity and capacity by public transport, walking and cycling, as well as to allow for sustainable deliveries and servicing."

The draft allocation therefore needs to be worded to allow flexibility with regard to the need for future additional operational facilities and also allow for the event that additional development could be accommodated should LU conclude that the site is not needed. In the latter case, a greater capacity of residential accommodation could be provided. This approach is necessary in order to make the site allocation positively prepared and justified, and the Local Plan sound.

Need for a comprehensive development approach

Although the site is in three separate ownerships, a comprehensive development across the land ownership boundaries would be the most efficient way to develop the land for the optimum amount and mix of uses. It would be helpful for the allocation to refer to this requirement.

Taking the above two points into consideration, it is suggested that the wording for the site requirements and development guidelines is updated along the following lines:

A portion of the site should be safeguarded for TfL / London Underground for operational purposes, to serve a future Northern Line upgrade, with the extent to be established by London Underground following feasibility studies. Should TfL conclude that this site is not required for transport infrastructure then additional residential development would be appropriate. Station functions must be maintained. Landowners should work with TfL and the Council to identify a comprehensive scheme. Good access to public transport and town centre functions support intensification. Mature trees within the site should be assessed and either preserved or replaced. There is adjoining Green Belt to the west and north and Site of Borough Importance for Nature Conservation along the western site boundary, along with the Dollis Valley Green Walk. A further restricting design factor is the suburban 2-3 storey housing to the east. Building heights must be carefully considered to avoid excessive impact within the area which already has the tall buildings of Barnet House and Northway House although there is some capacity for taller buildings particularly along High Road. Homes near to the Northern Line must be provided with noise mitigation, with trains running through the night on Friday and Saturday.

Percentage of land uses

The use of percentage figures is an overly simple approach which may constrain the delivery of new housing and development. Further, the extent of LU operational facilities that may be required on the site has not yet been established. Therefore, the figure of 46% for TfL rail infrastructure, commercial, community and car parking could mean a different quantum of development dependant upon the extent of LU operational

facilities required. As suggested in our previous Reg 18 representations, in the site allocations which deal with more complex and strategic sites the reference to % should be removed and it is suggested that the wording is updated along the following lines:

Proposed uses/ allocation (as a proportion of floorspace): 46% for TfL rail infrastructure and / or residential-led with commercial (office and light industry), community and car parking and 54% residential floorspace reflecting the site's highly accessible location and encouraging the use of public transport and active modes of travel.

Site capacity figures

Considering that the extent of requirements for LU operational facilities has not been established, the site could accommodate additional residential development should LU determine that the site is not required for additional infrastructure. We therefore suggest that the indicative residential capacities are given as minimum figures:

Indicative minimum residential capacity: 600

Site No 55: Woodside Park Station East

TfL CD appreciates the amendments made in response to our Reg 18 representations.

For reasons as set out above, the reference to 20% re-provision of car parking is not 'sound' and should be deleted from the "Proposed uses". We suggest it is amended:

Residential with 20% limited re-provision of car parking reflecting the site's highly accessible location and encouraging the use of public transport and active modes of travel.

Site No. 56: Woodside Park Station West

TfL CD appreciates the amendments made in response to our Reg 18 representations.

For information, TfL is currently completing enabling works so that our partner Pocket Living can commence development of the planning permission for the redevelopment of the southern part of the site to provide 86 affordable self-contained flats within two x five storey blocks (application ref: 19/4293/FUL). Implementation of the planning permission is currently scheduled to begin in October 2021.

The land to the north of Station Approach is a longer term development opportunity, dependant on provision of satisfactory access for pedestrians, cyclists and vehicles. This may require significant redesign of one of the station entrances to the western side of the bridge link at the station. At this stage, no feasibility studies have been carried out.

Site No. 61 Tally Ho Triangle

TfL has leasehold interests at this site related to the bus station. Our colleagues in TfL Spatial Planning will comment on this draft allocation.

Additional Proposed Site Allocations

Colindale Station

Although the Council has adopted the Colindale Underground Station Supplementary Planning Document (SPD) we consider that it would help to strengthen the planning position, including Compulsory Purchase, if the site benefitted from the additional weight that can be accorded to a site allocation within the adopted Local Plan. In our view, this should reflect the site and capacity of development that has been granted planning permission. As officers are aware, we are relooking at the viability of the consented residential scheme with a view to finding a new partner to bring this forward, probably as a modified scheme.

We would be happy to discuss this further with officers.

Land at Golders Green Station

Recently, officers have raised the prospect of improvements to the area at and around the station in order to enhance the town centre.

TfL CD submitted representations to the Golders Green Town Centre Strategy Consultation in October 2019. As we set out in the comments submitted for that consultation:

TfL CD are supportive of the vision for an *“improved bus station, providing new shops and facilities and injecting renewed life and vitality into the area”*. However, we strongly suggest that the vision also refer to how the redevelopment of Golders Green transport hub should make efficient use of a highly sustainable location and include the provision of residential uses. TfL CD considers this site to have capacity for significant mixed-use redevelopment in the future and, given its highly sustainable location, think it is important that the Town Centre Strategy fully recognises the scope for residential uses to come forward as part of this. Redevelopment of the site would align with NPPF paragraphs 108 and 118d and DLP Policies H1, D1 and D8 which aim to focus residential development in the most sustainable locations.”

The entrance into the bus station and the pedestrian environment is overly complicated and not user friendly, which is exacerbated by having so many roundabouts in the vicinity. Therefore, there should be some consolidation of the public realm and regularisation of the road network, which would enable a more logical layout and create a more pedestrian-friendly environment. TfL CD would like to work with the Council to explore opportunities for this.

TfL CD considers that Golder Green transport hub should have a site allocation. Whilst it is acknowledged that the Golders Green Town Centre Strategy has been prepared to

provide the detail around development within Golders Green that does not mean that a site allocation cannot be provided in the Local Plan as well, particularly as supplementary planning documents hold less weight than an adopted Local Plan.

To realise the transport and public realm benefits sought by the Council at and around the station, and in order for a scheme to be viable, it is most likely to require inclusion of a tall or very tall building/s; this would need to be referenced in a site allocation.

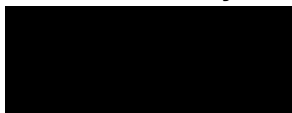
Examination Hearing Sessions

TfL CD would like to reserve its position for now and will advise Officers and the Planning Inspectorate at a later date whether it wishes to participate in examination hearing sessions.

Concluding Remarks

We trust that we have provided sufficient information for the borough to be able to consider our representations and we look forward to discussing key issues and sites with you. If you require any further information please do not hesitate to contact me or my colleague Luke Burroughs.

Yours faithfully



**Brendan Hodges
Planning Manager (Residential)
Transport for London Commercial Development**

cc.

Patricia Cazes-Potgieter -	TfL Commercial Development
Jonathan Cornelius -	TfL Commercial Development
Martin Teodorczyk -	TfL Commercial Development
Kelly Lopez -	TfL Commercial Development
Peter Elliot -	TfL Commercial Development
Tom Burnage -	TfL Commercial Development
Jonathan Woolmer	TfL Commercial Development
Rosanna Sterry -	TfL Commercial Development
Luke Burroughs -	TfL Commercial Development
Rakesh Agaravat	TfL Commercial Development
Jess Conway -	TfL Commercial Development
Patricia Charleton -	TfL Spatial Planning
Richard Carr -	TfL Spatial Planning
James Gummery -	LB Barnet
Fabien Gaudin -	LB Barnet
Andrew Dillon -	LB Barnet
Hardeep Ryatt -	LB Barnet