



Date: 14 June 2024
Our ref: TfL/Places/VSH/BH – LBB Main Mods 06/24
Your ref:

Planning Policy Team,
6th Floor,
2 Bristol Avenue,
London,
NW9 4EW

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

Dear Sir / Madam,

**BARNET DRAFT LOCAL PLAN
MAIN MODIFICATIONS REPRESENTATIONS**

Places for London ('Places') is pleased to provide our representations on the proposed Main Modifications to the draft Local Plan, published for consultation ending on Tuesday 18 June 2024. This follows the Examination in Public and the Inspectors' letter (EXAM 143) and appendix (EXAM 143A) dated 17 August 2023 setting out their main findings and the modifications that are required for the Plan to be capable of adoption.

Please note that the views expressed in this letter and table are those of Places in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. 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.

Places for London

Places is TfL's new and financially independent property company, formerly known as TTL Properties. We provide space for over 1,500 businesses in TfL stations and railway arches, as well as on London's high streets. We are working to develop TfL's surplus and / or under-used land to deliver new homes and jobs in highly sustainable locations, and to create excellent places to live, work and play which are sensitive to local needs and communities, and which are accessible to all. We are a significant land owner in the borough. In addition to numerous London Underground, Overground and bus stations and linked transport infrastructure, we also own a number of sites providing opportunities for the delivery of new homes and jobs in the borough. We have been working with officers throughout the Local Plan drafting and adoption processes to secure deliverable Site Allocations for our larger sites in Barnet.

Places tends to develop its larger sites as joint venture partnerships. At Edgware, we are working with Ballymore to bring our joint landholdings together for comprehensive redevelopment of the town centre, delivering thousands of new homes and jobs, alongside revitalised shopping and leisure and a new bus station / depot and interchange. We have also entered into the West London

Partnership (WLP) with Barratt London, with whom we have already delivered hundreds of new homes at Blackhorse Reach (LB Waltham Forest) and Wembley Park (LB Brent). The WLP is starting to progress a number of additional sites in North West London, including at High Barnet station. Therefore, our representations should be considered together with those submitted by Savills on behalf of Ballymore and Places, and Avison Young on behalf of the WLP.

Representations Forms

As requested, we have completed Representations Form Part A, which is attached to this letter.

We have not completed a separate Representations Form Part B for each of the Main Modifications as they are too numerous for this to be practical. Instead, our representations are provided within a table (attached below this letter) which follows a format that is similar to the Council's Table of Proposed Modifications. We trust that this provides our representations in a clear format for the Inspectors. However, if you need any additional information, please do not hesitate to contact us.

Concluding Remarks

We would be grateful if you could acknowledge receipt of these representations.

Yours faithfully



Brendan Hodges
Planning Manager (Residential and Commercial)
Places for London

cc.

[Redacted content]

Representations Form Part A

This form should be used to provide representations on the London Borough of Barnet Draft Local Plan. Representations must be received by 23:59 on 18th June 2024. Only those representations received within this period have the statutory right to be considered by the inspector at the subsequent examination. This form can be submitted via email to forward.planning@barnet.gov.uk or by post to Planning Policy Team, 6th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW.

Please read the guidance note, available on the Council's Engage webpage, before you make your representations. The main modifications to the emerging Local Plan and a full list of supporting documents and evidence are also available to view and download from the Council's Local Plan Review webpage: <https://www.barnet.gov.uk/planning-and-building/planning-policies-and-local-plan/local-plan-review>

Please note:

- Representations must only be made on the basis of the legal compliance or soundness of the Plan, or compliance with the Duty to Co-operate.
- All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.barnet.gov.uk/your-council/policies-plans-and-performance/privacy-notices>

This form has two parts:

Part A - Personal details - only necessary to complete once

Part B - Your representation(s) - please complete a separate sheet for each representation you wish to make.

PART A – Personal Details

	Personal details	Agent details (if applicable)
Title	Mr	
First name	Brendan	
Surname	Hodges	
Job Title (where relevant)	Planning Manager	
Organisation name (where relevant)	Places for London	
Email address (where relevant)	[REDACTED]	
Telephone number	[REDACTED]	
Address line 1	[REDACTED]	
Address line 2	[REDACTED]	
City/Town	[REDACTED]	
Postcode	[REDACTED]	
Country	[REDACTED]	

If you are submitting a representation on behalf of a group of individuals, please indicate how many people you are representing and describe how the representation has been authorised:

N/A

You can request to be added to the Council’s planning policy consultation database by emailing us at forward.planning@barnet.gov.uk. You will then be notified when planning policy related documents are available for consultation or are adopted.

You can request to be removed from any or all mailing lists at anytime by emailing us at the same email address.

PART B

BARNET DRAFT LOCAL PLAN MAIN MODIFICATIONS PLACES FOR LONDON REPRESENTATIONS

Underlined text = suggested additional text

~~Strikethrough~~ text = suggested deletion of text

MM Number	Chapter / Policy / Number	Representations
MMII	Chapter 4 – Growth & Spatial Strategy Table 5 – New Homes Delivery – 2021/22 to 2035/36	<p>MMII reduces the number of homes to be delivered in Edgware from 5,000 to approximately 4,740. This capacity reduction carries through to MMI3 (Policy GSS01) and MM20 (Policy GSS05).</p> <p>We understand that this modification is proposed for the following reasons:</p> <ul style="list-style-type: none"> • The Inspectors are not including the windfall uplift within the approximate capacity for Edgware. This results in a reduction of 225 units from the 5,000 figure; and • The Inspectors have removed 30 High Street and Equity House from the approximate capacity for Edgware. This results in a reduction of 32 units from the 5,000 figure. <p>Cumulatively, this results in a figure of 4,743. The Inspectors have then rounded the figure to arrive at 4,740, the number proposed within the Main Modifications as explained in paragraph 4.8.6.</p> <p>Based on the Inspectors’ reasoning set out above, Places supports MMII, and also MMI3 and MM20 insofar as they relate to the revised approximate capacity figure for Edgware.</p>
MMI3	Chapter 4 – Growth & Spatial Strategy Policy GSS01 - Delivering Sustainable Growth	<p>At paragraph B, a list of specific major new public transport infrastructure has been added. With respect to sub-paragraph c), we suggest modified wording to reflect the work that is underway at Colindale underground station and to accord with the Statement of Common Ground (SCG) agreed between Places and the Council (ref: EB_SoCG_14) and references elsewhere in the draft Local Plan:</p>

		<p>c) New underground station <u>ticket hall building</u> and enhanced public transport interchange at Colindale;</p> <p>This suggested further modification is for the purposes of clarification only and is considered to be legally compliant and sound.</p> <p>At paragraph C, and based on the Inspectors’ reasoning set out under MMII, Places supports the revised approximate housing delivery figure for Edgware.</p> <p>We welcome the addition of paragraph D, confirming the Council’s support for Build to Rent (BtR); paragraph E, promoting the ‘design led approach’ and delivery on small sites; and paragraph F, promoting self and custom build.</p> <p>We consider these changes to be legally compliant and sound.</p>
MM20	<p>Chapter 4 – Growth & Spatial Strategy</p> <p>Policy GSS05 - Edgware Growth Area</p>	<p>We welcome the added clarification that the Council supports proposals in the Edgware Growth Area that optimise residential density on suitable sites in accordance with design-led approach. In paragraph A a), and based on the Inspectors’ reasoning set out under MMII, Places supports the revised approximate housing delivery figure for Edgware.</p>
MM22	<p>Chapter 4 – Growth & Spatial Strategy</p> <p>Policy GSS06 - Colindale Growth Area</p> <p>Paragraph 4.I9.8</p> <p>Paragraph 4.I9.10</p>	<p>Places welcomes the more ambitious approach to development within the Colindale Growth Area and, in particular, the increase in capacity, optimisation of the use of land and provision for uplift through the design-led approach.</p> <p>We welcome the focus of development on specific sites, including (in paragraph A c) i.) the reconstruction and upgrading of the Underground Station to increase its capacity, provide step free access (SFA) and facilitate the redevelopment of adjacent land owned by TfL and others. The Inspectors will be pleased to note that TfL’s reconstruction and upgrading of the station is currently underway and is due to be completed in Autumn 2025.</p> <p>In the absence of a Site Allocation for development at and adjacent to Colindale Underground Station (as sought via our previous representations), we consider that additional clarification in respect of this development would be helpful:</p>

		<p>i. Reconstruction and upgrading of Colindale Underground Station to increase its capacity and provide a step-free access station, along with additional cycle parking and facilitating the <u>housing-led</u> redevelopment of adjacent land owned by TfL and others;</p> <p>We also welcome the modification in paragraph B b) to refer to the new Underground Station <i>ticket hall</i> building (please see our comments on MMI3 above). We assume that this will become paragraph B a) following deletion of the preceding paragraph relating to Colindale Gardens.</p> <p>Similarly, we welcome clarification in respect of the station works in the supporting text, paragraph 4.19.8 (first bullet). This would be further improved by an additional modification to refer to <u>housing led</u> redevelopment.</p> <p>In paragraph 4.19.10, we welcome clarification that the Colindale Station SPD (2019) should be used with regard to Local Plan policy for the Colindale Growth Area.</p> <p>We consider the modifications to be in conformity with national and London Plan policies, and to be legally compliant and sound.</p>
MM24	<p>Chapter 4 – Growth & Spatial Strategy</p> <p>Policy GSS07 - Mill Hill East</p>	<p>Similarly, we welcome the more ambitious approach to development in Mill Hill East and, in particular, the increase in capacity and optimisation of the use of land through the design-led approach. We also welcome recognition (in paragraph A) that development at the Underground Station can contribute towards the achievement of the additional new homes.</p> <p>We consider the modifications to be in conformity with national and London Plan policies, and to be legally compliant and sound.</p>
MM26	<p>Chapter 4 – Growth & Spatial Strategy</p> <p>Policy GSS08 - Barnet’s District Town Centres</p>	<p>Again, we welcome the additional references to optimising the use of land and site capacity through a design-led approach. This conforms with national and London Plan policies, and is legally compliant and sound.</p>
MM27	<p>Chapter 4 – Growth & Spatial Strategy</p>	<p>Again, we support the additional references to optimising the use of land and site capacity through a design-led approach.</p>

	<p>Policy GSS09 - Existing and Major New Public Transport Infrastructure</p> <p>Paragraph 4.24.5</p>	<p>We welcome specific reference in paragraph B c) to additional existing transport hubs at Colindale, High Barnet and Woodside Park offering significant potential for intensification and growth.</p> <p>In the final paragraph of the policy, Places supports the added reference, in connection with redeveloping station car parks, to replacement car parking being provided <i>“only where essential , for example for disabled persons or operational reasons”</i>. Similarly we welcome the modifications to supporting text paragraph 4.24.5.</p> <p>These modifications conform with national and London Plan policies, and with the Mayor’s Transport Strategy, and they are legally compliant and sound.</p>
MM29	<p>Chapter 4 – Growth & Spatial Strategy</p> <p>Policy GSSII - Major Thoroughfares</p>	<p>Places welcomes clarification, in paragraph A.d), that the Council will support residential and mixed-use development along the Transport for London Road Network (TLRN) / Major Thoroughfares and also the references to Heathy Streets and PTAL. We also support the changes to paragraph B and the subsequent final paragraph. We welcome the modifications to paragraph 4.26.6, which accord with our SCG.</p>
MM30	<p>Chapter 4 – Growth & Spatial Strategy</p> <p>Policy GSSI2 - Redevelopment of Car Parks</p>	<p>We welcome the modifications which provide a supportive approach to the redevelopment of publicly accessible, surface level car parks for residential and main town centre uses. We agree that the PTAL methodology should lead to the optimisation of housing numbers according to public transport accessibility, together with active modes of travel.</p> <p>We consider that these modifications conform with national and London Plan policies, and with the Mayor’s Transport Strategy, and that they are legally compliant and sound.</p>
MM33	<p>Chapter 5 Housing</p> <p>Policy HOU01 - Affordable housing</p> <p>Paragraphs 5.4.10 and 5.4.10B.</p>	<p>Places welcomes bringing this policy in to line with London Plan affordable housing policies. We welcome clarification in paragraph A.f) regarding optimising the use of land and site capacity through a design-led approach, which will help to optimise affordable housing delivery and tenure mix.</p> <p>We welcome paragraph 5.4.10’s reiteration that the portfolio approach applies to publicly owned land; TfL / Places has such an agreement with the Mayor.</p>

		<p>We note that paragraph 5.4.10B refers to <i>“the threshold set out in Policy HOU01”</i>. It is not clear what this threshold refers to. Reference to developments of 10 or more dwellings has been deleted from policy HOU01 as part of MM33. Therefore, this need clarification.</p> <p>We consider that these modifications conform with national and London Plan policies, and with the Mayor’s Transport Strategy, and that they are legally compliant and sound.</p>
MM41	<p>Chapter 6 Character, Design & Heritage</p> <p>Policy CDH01 – Promoting High Quality Buildings</p>	<p>We welcome the additional reference to the design led approach supporting <i>“higher density development in the most sustainable and well-connected locations and areas with existing high-density development”</i>. This conforms with national and London Plan policies, and with the Mayor’s Transport Strategy, and is legally compliant and sound.</p>
MM46	<p>Chapter 6 Character, Design & Heritage</p> <p>Policy CDH04 – Tall Buildings</p>	<p>Places agrees that the references to ‘very tall buildings’ should be deleted from the policy, and also with the approach for closer conformity to London Plan policy D9. This accords with representations we have made previously and with our case set out in the SCG.</p> <p>We also welcome clarification that sites outside the locations specified as potentially suitable for tall buildings will not be refused as a matter of principle but rather assessed against specified development management criteria (supporting paragraph 6.18.3). This approach is consistent with the London Plan.</p> <p>We consider that an additional modification should be made to the final sentence of paragraph 6.18.5 to also refer to the Colindale Station SPD which provides important guidance on height. This clarification would be consistent with MM22.</p> <p style="text-align: center;">The Council will also expect proposals for tall buildings to reflect the guidance provided in area planning frameworks such as the Edgware Growth Area SPD, and the North Finchley Town Centre Framework SPD <u>and the Colindale Station SPD</u>.</p> <p>We consider these Main Modifications and our suggested additional modification to be in conformity with national and London Plan policies, and to be legally compliant and sound.</p>

MM69	<p>Chapter 10 Environment and Climate Change</p> <p>Policy ECC05 - Green Belt and Metropolitan Open Land</p> <p>Paragraph 10.24.4</p>	<p>We agree with the deletion of paragraph A.ii and that a design-led approach should be taken to proposed development that is adjacent to Green Belt / MOL with a focus on landscape and local character where necessary. We consider this to be in conformity with the NPPF and London Plan.</p>
MM71	<p>Chapter 11 Transport and Communications</p> <p>Policy TRC01 - Sustainable and Active Travel</p> <p>Paragraph 11.4.2</p>	<p>Places welcomes policy TRC01's increased emphasis on active travel and agrees that it is <i>“the mode with the least environmental impact and health benefits for residents”</i>. We consider that the modification conforms with national and London Plan policies, and with the Mayor’s Transport Strategy, and that it is legally compliant and sound.</p> <p>In paragraph 11.4.2, reference is made to Colindale station. The date that the upgraded station is due to reopen should be changed from 2024 to 2025 (albeit temporary measures will enable the station to be reopened in December 2024). . We suggest the following additional modifications for clarity:</p> <p style="padding-left: 40px;">The Government in 2023 announced Levelling Up funding <u>to increase passenger capacity at for the redevelopment of the existing Colindale Underground station (including provision of a new, larger ticket hall and step free access)</u>. Funding has also been provided for the <u>new station upgrade (which is expected to open in 2024)</u> by contributions from the Peel Centre development as well as from the Council and TfL. <u>The new station entrance will reopen in autumn 2025</u>. The redevelopment, which is being taken forward in partnership with TfL, will increase station capacity to meet the needs of the growing population, create step-free access and support sustainable transport choices.</p>
MM73	<p>Chapter 11 Transport and Communications</p> <p>Policy TRC03</p>	<p>We welcome the modification to policy TRC03 which clarifies that car and motorcycle parking will be limited rather than provided within developments. This conforms with national and London Plan policies, and with the Mayor’s Transport Strategy, and in our view it is legally compliant and sound.</p> <p>Places welcomes the modifications to paragraph B. which are in line with our previous suggestions and which clarify that CPZs do not need to be in place prior to the occupation of development, as the delivery of CPZs is outside control of applicants. In our view this is legally compliant and</p>

		<p>sound. However, the supporting text in paragraph II.12.6 appears to be contradictory and, for the plan to be effective, it should be deleted or amended:</p> <p>The Council may seek to ensure that new or updated CPZs become effective prior to the occupation of a development proposal where unacceptable impacts on local highway conditions would otherwise result.</p>
MMI05	<p>Site 24</p> <p>East Finchley Station Car Park</p>	<p>We welcome the modified <i>“Proposed uses / allocation”</i> and <i>“Justification”</i> text which accords with our SCG agreed between Places and the Council (ref: EB_SoCG_14).</p> <p>The further modifications to <i>“Site requirements and development guidelines”</i> are accepted in terms of the references to the adjacent listed station building and conservation area, and the guidance that high density, low to medium rise typologies might be a suitable approach to development.</p> <p>We note and agree that proposals for redevelopment of car parking spaces must meet the requirements of Policies TRC03 and GSS12.</p> <p>Reference to the community garden is agreed, although, as noted, it is not located within the site allocation and currently we do not intend to develop this land. Reference to the Strategic Walking Network is agreed in this and subsequent Site Allocations.</p> <p>We consider that the modified Site Allocation conforms with national and London Plan policies, and with the Mayor’s Transport Strategy, and that it is legally compliant and sound.</p>
MMI06	<p>Site 25</p> <p>East Finchley Substation</p>	<p>We have disposed of this site and have no further comments on the draft allocation.</p>
MMI08	<p>Site 27</p> <p>Edgware Town Centre</p>	<p>We welcome and generally agree with the proposed Main Modifications to the Site Allocation and we consider that they conform with national and London Plan policies, and with the Mayor’s Transport Strategy, and that they are legally compliant and sound.</p>

MMI09	Site 28 Edgware Underground & Bus Stations	We welcome and generally agree with the proposed Main Modifications to the Site Allocation and we consider that they conform with national and London Plan policies, and with the Mayor's Transport Strategy, and that they are legally compliant and sound.
MMIII	Site 30 Finchley Central Station	<p>The modifications to the <i>"Site Address"</i> are as agreed between Places and the Council in our SCG.</p> <p>The new site map is correct.</p> <p>The modified <i>"Proposed uses / allocation"</i> is substantially as agreed between Places and the Council in our SCG and we support the additional reference to the site's highly accessible location and encouraging the use of public transport and active modes of travel.</p> <p>Places welcomes the approach to tall buildings of eight storeys or more set out in the modified <i>"Site requirements and development guidelines"</i>, essentially a design-led and contextual approach. This should provide the flexibility required to deliver the high quality buildings of various scales and floorspace that will be needed to maximise the prospects for delivery of this important housing-led, mixed-use opportunity. Clarification that the Site Allocation may be appropriate for tall buildings would be helpful (the current modified draft refers to the <i>town centre</i> as being suitable) and this would accord with policy CDH04 and Map 4.</p> <p>We note and agree that proposals for redevelopment of car parking spaces must meet the requirements of Policies TRC03 and GSSI2. We consider that the modified Site Allocation conforms with national and London Plan policies, and with the Mayor's Transport Strategy, and that it is legally compliant and sound.</p>
MMII2	Site 31 Brentmead Place	<p>We have no comments on the proposed non-material modifications to this Site Allocation.</p> <p>We consider that the modified Site Allocation conforms with national and London Plan policies, and with the Mayor's Transport Strategy, and that it is legally compliant and sound.</p>
MMI24	Site 44 High Barnet Station	Places considers there to be good prospects for delivery of a housing-led, mixed-use scheme, at least in part, over a five year <i>"Development timeframe"</i> . Together with our development partner, Barratt London, we have commenced formal pre-application meetings with officers and will be

engaging with other stakeholders and the local community later this year with a view to submitting a planning application in 2025. We therefore suggest a further modification:

Development timeframe: ~~0-5~~ 6-10 years

The modified *“Proposed uses / allocation”* is substantially as agreed between Places and the Council in our SCG and we support the additional reference to the site’s highly accessible location and encouraging the use of public transport and active modes of travel.

The second paragraph of *“Site requirements and development guidelines”* states that the site is not in a tall buildings location and that *“8 storeys or more would not be appropriate”*. In the context of the Main Modifications to Policy CDH04 – Tall Buildings, this needs further modification. MM46 to Policy CDH04 clarifies that sites outside the locations specified as potentially suitable for tall buildings will not be refused as a matter of principle but rather assessed against specified development management criteria. Therefore, we suggest the following additional modification to bring the Site Allocation into conformity with Policy CDH04:

This site is not in a location specified as potentially suitable for tall buildings. Tall Buildings Location – 8 storeys or more would not be appropriate. Buildings of 8 storeys or higher will be assessed against Policy CDH04, London Plan policy D9 and development management criteria.

We note and agree that proposals for redevelopment of car parking spaces must meet the requirements of Policies TRC03 and GSS12.

A Main Modification to the third paragraph seeks *“a pedestrian bridge over the railway line to Potters lane if possible”*. Places is very keen to significantly improve access and accessibility to the station and also interchange between the railway and buses. As such, we consider that the focus should be on improving linkages northwards towards Chipping Barnet, southwards towards Underhill and between the station and bus stops on Barnet Hill. The development of new homes on this site would not necessitate a pedestrian link over the railway to Potters Lane in order to make the development acceptable in planning terms and we consider that this Main Modification may raise unrealistic expectations. Provision of a bridge would also reduce land available for public realm and the delivery of new homes, and it would also have implications for the operation of the railway – potentially requiring closure of this part of the Northern Line, at times, during

		<p>construction. Combined with impacts on viability (the site has considerable abnormal costs associated with development adjacent to the railway and, being publicly owned land, there are higher requirements and expectations for provision of affordable housing) we consider that provision of a bridge would be unnecessary and undeliverable and our preference would be for this Main Modification to be deleted.</p> <p>A further Main Modification seeks a footway down the east side of Barnet Hill. We have identified that pedestrian access along the east side of Barnet Hill, south of the station slip road, would be beneficial and are looking at options for this. However, please note that it would not be possible to extend a footway beneath the railway bridge located to the east of Fairfield Way due to its narrow width. Therefore, pedestrians would have to cross to the south side of Barnet Hill to continue their journey to / from the south east.</p> <p>We consider that options for the provision of the footway should be kept open – a better and more attractive route might be provided within the site, rather than along the edge of Barnet Hill, a busy A road which is currently quite hostile for pedestrians.</p> <p>Therefore, to be sound and deliverable, we suggest further modifications to the final sentence of the third paragraph:</p> <p style="padding-left: 40px;">Proposals for development should seek to provide a pedestrian bridge over the railway line to Potters Lane if possible, or otherwise provision of a footway either down the east side of Barnet Hill south of the station slip road or within the site roughly parallel to Barnet Hill. will be necessary.</p> <p>We consider that the Site Allocation, modified as we have suggested, would conform with national and London Plan policies, and with the Mayor’s Transport Strategy, and that it would be legally compliant and sound, and deliverable.</p>
MMI27	Site 47 Mill Hill East Station	The modified <i>“Proposed uses / allocation”</i> is substantially as agreed between Places and the Council in our SCG and we support the additional reference to the site’s accessible location and encouraging the use of public transport and active modes of travel.

		<p>The Site Allocation provides two opportunities for housing-led development: north and south of the railway tracks. The <i>“Site requirements and development guidelines”</i> should reflect this.</p> <p>To the north of the railway tracks, we are considering disposing of the land to an adjoining owner in order that a comprehensive development together with 51 Bittacy Hill is possible. South of the railway tracks, development of the TfL land is likely to only be feasible in partnership with other landowners outside of the Site Allocation. In our view, comprehensive redevelopment with adjoining owners of land to the south of the railway tracks provides the potential for greater height and density development than to the north, where amenity impacts on existing residents at Bittacy Road may need to be mitigated.</p> <p>The preservation of mature trees will impede development, particularly to the south of the railway tracks, and we suggest a more flexible approach to enable high quality design and layout, and with reference to the quality of the trees. We suggest an approach which is consistent with MM133 for Site 53 (Alum Way) which states <i>“Mature trees within the site should be assessed and either preserved or replaced to protect existing site ecology”</i>. Coupled with BNG and UGF requirements, this approach would be in accordance with modified Policy ECC06 (Biodiversity) and London Plan policy G7 (Trees and woodlands).</p> <p>The final paragraph, relating to assessment of public car parking requirements, should be deleted as these matters will be considered within the Transport Assessment or Transport Statement required by modified Policy GSS12 (Redevelopment of car parks). Reference is made to GSS12 in the new sixth paragraph and it should not be necessary to repeat.</p> <p>We therefore suggest the following additional modifications to the <i>“Site requirements and development guidelines”</i>:</p> <p style="padding-left: 40px;">The varied surroundings to the site mean that the design and height must be sensitive in terms <u>of</u> intensification; for example, the southern boundary towards the supermarket provides greater scope for building height than towards the low-rise housing to the west.</p> <p style="padding-left: 40px;">A design-led approach required to building heights in this location must take account of the locally listed station building. Subject to careful layout, massing and design testing, <u>to the north of the railway</u> buildings over 3 storeys in height, taking cues from the Millbrook Park redevelopment to the north-east opposite, where there are a range of taller buildings, may</p>
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		<p>be explored. Comprehensive development of the site allocation with neighbouring sites, should they come forward, will be encouraged to optimise density and housing, services and facilities for existing and future residents of Mill Hill East. <u>To the south of the railway tracks, comprehensive development with adjoining landowners is likely to offer opportunities for greater height and density.</u></p> <p><u>Mature trees within the site should be assessed and either preserved or replaced to protect existing site ecology. Preservation of mature trees is required.</u> Any development of the land must seek to retain important wildlife habitats and trees that are present on the north and south sides of the railway line. <u>Arboricultural surveys should be undertaken and there may be scope for some replacement of mature trees if it is necessary to enable high quality layout and design, particularly poorer value specimens.</u></p> <p>Proposals must make the fullest contributions to enhancing and/or creating biodiversity in accordance with Policies CDH07 and ECC06 of the Local Plan.</p> <p>The station building and associated platforms and tracks should be retained. Development around the station building will need to be mindful of its local listing. Should the station building be proposed to be demolished, the loss of the locally listed building would need to be robustly justified relative to its status and significance as a non-designated heritage asset, and a replacement station building would need to be provided.</p> <p>This site lies on the Strategic Walking Network. Development proposals must take the opportunity to ensure effective connectivity to this network.</p> <p>Residential-led mixed use development should provide the necessary transport infrastructure with regard to Policy TRC02. Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.</p> <p>The scale of development is likely to require upgrades of the water supply network infrastructure. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing phasing plan to ensure development does not outpace delivery of essential network upgrades.</p>
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		<p>An assessment of public car parking requirements must be undertaken and mitigation provided to encourage the use of public transport and active modes of travel.</p> <p>We consider that the Site Allocation, with the additional modifications we have suggested, would conform with national and London Plan policies, and with the Mayor’s Transport Strategy, and that it would be legally compliant and sound.</p>
MMI30	<p>Site 50</p> <p>Watford Way & Bunns Lane</p>	<p>We welcome and generally agree with the proposed Main Modifications to the Site Allocation except for one matter.</p> <p>TfL requires the option to use the site to support transport operations (either stand alone or collocated with housing development). In our SCG, we agreed that the following would be included as a modification to the “<i>Site requirements and development guidelines</i>” section:</p> <p style="padding-left: 40px;">In the event that TfL requires part of the site to support transport operations, this use must be carefully sited and designed to ensure the amenity of new and existing housing is maintained.</p> <p>This has been included in the Main Modifications but with an additional reference to locating the operations on a part of the site adjacent to the AI. This should be deleted as there is no decision on where transport operations would be most appropriately located, and it was not agreed in the SCG. In addition, it is not clear what the Main Modification’s added reference to “<i>suitable living environment</i>” means; the reference to residents’ amenity should be sufficient to protect their interests. Therefore, additional modifications are required to the last sentence of the first paragraph:</p> <p style="padding-left: 40px;">In the event that TfL requires part of the site adjacent to the AI to support transport operations, this use must be carefully sited and designed to ensure the amenity a suitable living environment of new and existing housing is maintained.</p> <p>We consider that the Site Allocation, with the additional modifications we have suggested, would conform with national and London Plan policies, and with the Mayor’s Transport Strategy, and that it would be legally compliant and sound.</p>

MMI33	<p>Site 53</p> <p>Allum Way</p>	<p>The modified <i>“Proposed uses / allocation”</i> is substantially as agreed between Places and the Council in our SCG and we welcome the additional reference to the site’s accessible location and encouraging the use of public transport and active modes of travel.</p> <p>We welcome the modification for <i>“Indicative residential capacity”</i> being expressed as a minimum, with scope to increase this if a portion of the site is not required for transport infrastructure. This approach is policy compliant and sound.</p> <p>The Main Modifications to the first paragraph of the <i>“Site requirements and development guidelines”</i> accords with what was agreed in our SCG and maintains flexibility for transport operations and / or housing-led, mixed-use development.</p> <p>We welcome clarification in the second paragraph that tall buildings may be appropriate on this site and we agree that the approach is consistent with policy CDH04.</p> <p>We welcome the new third paragraph which confirms that residential capacity could be increased if transport infrastructure is not required on site. We agree that the design-led approach should be taken to site optimisation in line with London Plan policy D3.</p> <p>We note and agree that proposals for redevelopment of car parking spaces must meet the requirements of Policies TRC03 and GSS12.</p> <p>We consider that the modified Site Allocation conforms with national and London Plan policies, and with the Mayor’s Transport Strategy, and that it is legally compliant and sound.</p>
MMI35	<p>Site 55</p> <p>Woodside Park Station East</p>	<p>The modified <i>“Proposed uses / allocation”</i> is substantially as agreed between Places and the Council in our SCG and we support the additional reference to the site’s accessible location and encouraging the use of public transport and active modes of travel.</p> <p>We welcome expression of the <i>“Indicative residential capacity”</i> as a minimum.</p> <p>We note and agree that proposals for redevelopment of car parking spaces must meet the requirements of Policies TRC03 and GSS12.</p>

		<p>The reference in the third paragraph to the need for a buffer with properties on Woodside Grange Road and Budd Close is unclear. If this is necessary, it should be clarified whether it is required for placemaking and / or amenity reasons (ie. privacy, separation, outlook etc).</p> <p>Subject to addressing these issues, we consider that the modified Site Allocation conforms with national and London Plan policies, and with the Mayor’s Transport Strategy, and that it is legally compliant and sound.</p>
MMI36	<p>Site 56</p> <p>Woodside Park Station West</p>	<p>We accept that there are significant issues that will need to be addressed to develop the northern part of this Site Allocation. Accordingly, we will not object to the proposed Main Modifications and agree that a design-led approach is required to address site constraints and deliver new homes here.</p>