



London Borough of Barnet  
Planning Policy Department,  
2 Bristol Avenue,  
Colindale,  
NW9 4EW

Email: [REDACTED]

18 June 2024

To Whom It May Concern,

**Barnet Draft Local Plan - Proposed Final Main Modifications (May 2024)  
Regeneration of Curry Rise and Bray Road Estate, Mill Hill East**

On behalf of Springboard Two Housing Association Limited (“STHAL”) a subsidiary of Notting Hill Genesis (“NHG”), we hereby set out our representations to the proposed final Main Modifications of the Barnet Local Plan.

The following documents comprise the submission of representations to the Council:

- Form A;
- Form B; and
- Appendix 1: Proposed additions to Annex 1 (List of Sites - Summary Table).

It is noted that the emerging Local Plan is at a late stage in preparation and Examination in Public has taken place. However, since the Examination closed in November 2022, STHAL has taken the decision to redevelop the Curry Rise and Bray Road Estate in Mill Hill. It is important that the site and the proposals for redevelopment are included as a site proposal and in the Schedule of Site Proposals in the Local Plan. In the context of the very challenging issues facing STHAL in the regeneration of the estate, and the importance of the delivery of new homes, it is important that the policies in the Local Plan enable a viable high-quality scheme to come forward and be delivered.

**Site Description**

The Estate is located in the Mill Hill area of the London Borough of Barnet. It is owned by NHG who purchased the site from Barnet Council in 1995. A site Location Plan is included at Appendix 1.

The Estate comprises 143 homes made up of 132 flats in 11 walk-up blocks and 11 terraced houses, with associated landscape, parking and access roads covering 2.7 hectares. The flats are all two bedroom and the houses four bedroom. 17 of the flats are leasehold; the remainder of the properties comprise social rented homes with NHG as the Registered Social Landlord.

Vehicular and pedestrian access to the housing within the Estate is via Curry Rise or Bray Road, both of which adjoin Inglis Way which runs along the southern boundary of the site. Inglis Way provides access to Bittacy Hill (B552) which is to the west of the site.

[REDACTED]



The Estate is surrounded by the Millbrook Park development to the north, east and south. Millbrook Park is in the final stages of a comprehensive residential-led development with other non-residential supporting uses such as a supermarket and a school. This phased development is nearing completion with only the phases to the east of the Estate still to be constructed.

**Background**

The need for redevelopment of the Estate has arisen as a result of a combination of ground conditions, the original construction and subsequent alterations made to the blocks and the presence of trees which has resulted in a number of the blocks suffering from major subsidence issues. The costs to remediate the problems above are substantial.

STHAL has undertaken feasibility work which has concluded that a more sustainable approach will involve the demolition of the existing properties and their replacement with new homes, as well as the provision of additional homes resulting in an uplift in housing. The urgency of the subsidence issues has resulted in a requirement to temporarily decant a number of residents off the site, many of whom wish to return following the redevelopment of the site.

A number of in principle supportive pre-application discussions have also taken place with planning, design, housing and tree officers at the LB Barnet and the Greater London Authority (GLA). A residents’ ballot is currently taking place (in accordance with the requirements of the GLA) with the result of the ballot to be announced in July. Subject to a ‘yes’ vote in the ballot, it is intended that a planning application will be submitted in Spring 2025.

It is anticipated that the redevelopment will deliver up to 340 homes (an increase of up to circa 200 homes). Feasibility work is currently ongoing to determine the optimum capacity of the site based on site constraints and a design-led approach.

The first phase of the scheme will reprovide housing for existing residents and will be affordable housing. The second phase of the development will provide additional homes which will help to cross subsidise the affordable housing. The housing mix (in terms of size and tenure) of the second phase will be dependent on the overall viability of the scheme. It is anticipated that the replacement and new homes will be delivered in 0-5 years of the adoption of the Local Plan.

**Representations to the Main Modifications**

Detailed representations have been completed on forms A and B, which also outline suggested amendments to the wording of the policy text.

The main suggested amendments to policy in the Local Plan are to include the Curry Rise and Bray Road Estate as a Site Proposal, within the proposed spatial strategy and projected housing delivery figures noting the development timeframe is 0-5 years. It is anticipated that the regeneration of the Estate will result in an indicative capacity of c. 340 homes (including the re-provision of existing homes) therefore, the allocation of the Estate will provide a significant number of homes within Mill Hill East.





We trust that the inclusion of the Curry Rise and Bray Road Estate will be fully considered by the Council and the Examination Inspectors in the preparation of the final version of the Local Plan and would be happy to discuss the proposals with you. If you require any additional information, please contact myself or my colleague Jill Bell.

Yours faithfully

**Patrick Grincell**  
Executive Director







**Main Modifications  
Local Plan**

**Representations Form**

Ref:
(For official use only)

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 18<sup>th</sup> 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](mailto: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-notice>

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		Patrick
Surname		Grincell
Job Title (where relevant)		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Email address (where relevant)		[REDACTED]
Telephone number		[REDACTED]
Address line 1		[REDACTED]
Address line 2		
City/Town		[REDACTED]

Postcode		████████
████████		█

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:

You can request to be added to the Council's planning policy consultation database by emailing us at [forward.planning@barnet.gov.uk](mailto: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.



**Main Modifications  
Local Plan**

Representations Form

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**PART B - Your representation**

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

**Question 1: To which Main Modification does your representation relate?**

*Representations must be made on a specific Main Modification (MM) or Policies Map change*

MM Number: MM9 Policy: BSS01 Paragraph \_\_\_\_\_

Figure/Table \_\_\_\_\_ Policies Map change \_\_\_\_\_

**Question 2: Do you consider that the Main Modification is:**

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

- |  |   |  |
|--|---|--|
| a) Legally compliant                     | Yes <input checked="" 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 checked="" type="checkbox"/> | No <input type="checkbox"/>            |

**Question 3: Please give details of why you consider the Main Modifications is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

*Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.*

Policy BSS01 outlines the spatial strategy for the borough. The spatial strategy does not identify the Mill Hill East Area as a 'Growth Area' or an 'Opportunity Area', however, it is identified in the Key Diagram and as an area where new homes will be directed in Policy GSS01.

The spatial strategy and Policy BSS01 should be consistent with other policies in the plan such as GSS01 and the Key Diagram and identify Mill Hill East as an area where growth is also encouraged. Part C of the policy which sets out where growth should be concentrated should also include the Mill Hill East Area. SHTHAL objects to the policy as it is currently drafted as it has not been positively prepared.

**Continue on a separate sheet if necessary**

**Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with respect to the matters you have identified in Question 3 above.**

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

To ensure that the spatial strategy is aligned with Policy GSS01 and the Key Diagram, and is positively prepared the wording of the policy should be amended as follows – changes shown in bold:

*In order to make effective use of land in urban areas and better manage the impacts of development on the climate, growth will be concentrated in Barnet's Growth Areas, Opportunity Areas (as identified in the London Plan), ~~and~~ District Town Centres **and other areas identified for future housing as set out in Policy GSS01**. These are the most sustainable locations with good public transport connections and active travel provision.*

**Please note:**

*In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s).*

**Declaration of consent**

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

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



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

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

**Signature:** hgh Consulting on behalf of Springboard Two Housing Association Limited

**Date:** 18 June 2024



**Main Modifications  
Local Plan**

Representations Form

Ref:

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**Question 1: To which Main Modification does your representation relate?**

*Representations must be made on a specific Main Modification (MM) or Policies Map change*

MM Number: MM24 Policy: GSS07 Paragraph \_4.22.4\_\_\_\_\_

Figure/Table \_\_\_\_\_ Policies Map change \_3E\_\_\_\_\_

**Question 2: Do you consider that the Main Modification is:**

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

- |  |   |  |
|--|---|--|
| a) Legally compliant                     | Yes <input checked="" 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 checked="" type="checkbox"/> | No <input type="checkbox"/>            |

**Question 3: Please give details of why you consider the Main Modifications is not legally**

Policy GSS07 outlines the spatial strategy for Mill Hill East.

Paragraph A. Level of Development

Part A of the policy advises that in the Mill Hill East area there is capacity to deliver 2,280 additional new homes and identifies a number of sites in Mill Hill East which can deliver these new homes. The policy does not include the new homes that can be delivered through the redevelopment of the Curry Rise and Bray Road Estate in Mill Hill. The site is adjacent to development that has been granted planning permission as part of the redevelopment of Millbrook Park, the majority of which has now been built out and is occupied. The Curry Rise and Bray Road Estate is included within the area covered by the Mill Hill East Area Action Plan.

Since the conclusion of the Examination in Public in November 2022, Notting Hill Genesis (“NHG”) who own the Curry Rise and Bray Road Estate (which comprises predominantly social rented housing with a limited number of shared ownership properties) has made the decision to progress with redeveloping the estate. This is due to the combination of ground conditions, the original construction and subsequent alterations made to the blocks and the presence of trees which has resulted in a number of the blocks suffering from major subsidence issues. The costs to remediate the problems are substantial. Springboard Two Housing Association Limited (“STHAL”) – a subsidiary of NHG has undertaken feasibility work which has concluded that a more sustainable approach will involve the demolition of the existing properties and their replacement with new homes, as well as the provision of additional homes resulting in an uplift in housing.

A resident’s ballot is currently taking place in accordance with GLA policy with the result of the ballot anticipated in early July. Subject to a ‘yes’ vote in the ballot is intended that a planning application will be submitted in Spring 2025.

The first phase of the scheme will re-provide housing for existing residents and will comprise affordable housing. The second phase of the development will provide additional homes which will help to fund the overall development. It is anticipated that the replacement and new homes (up to an estimated capacity of 340 homes) will be delivered in 0-5 years of the adoption of the Local Plan. Further information is provided in the letter that accompanies these representations.

Noting the requirement for the comprehensive redevelopment of the estate and the delivery of new homes in the next 0-5 years, to ensure that the plan is positively prepared, the Curry Rise and Bray Road Estate should be identified as a site proposal in Part A of Policy GSS07 and in the Schedule of Proposals at Annex 1 as a site that can deliver up to an estimated capacity of 340 homes (noting that 143 of these will be replacement homes). STHAL currently objects to the policy on the basis that the Curry Rise and Bray Road Estate is not identified as a site that can deliver new homes.

Paragraph B. Development Proposals

The policy states that proposals must be supported by a Transport Assessment (TA) setting out public transport improvements and demonstrating how sustainable options will be provided. It also requires the TA to take into account the cumulative impacts arising from other committed development.

There is no objection to the requirement for proposals that come forward within Mill Hill East to be supported by a Transport Assessment. STHAL object to the requirement for TA’s to set out public transport improvements.

The Curry Rise and Bray Road Estate is adjacent to the Millbrook Park development. The majority of the phases of Millbrook Park have been build out and homes are occupied. As part of this redevelopment a number of public transport improvements were secured and have already been delivered.

There is no justification provided in the draft Local Plan to require sites such as the Curry Rise and Bray Road Estate (which will provide up to a net addition of up to 200 homes) to provide public transport improvements where public transport improvements have recently be secured and implemented for the local area; where this is not proportionate to the number of new homes, and where this might impact on the viability of schemes. This part of the policy is not consistent with national policy in the NPPF (paragraph 117) which sets out the requirement for a TA but does not require the TA to set out public transport improvements. This part of the policy has not been positively prepared.

The policy wording for Part B should be amended to require the TA to set out the current provision of public transport that serves the development site and assess whether the development would necessitate any public transport improvements to make the development acceptable in planning terms.

#### Supporting text 4.20.4 (AAP)

Supporting paragraph 4.20 states that the AAP for Mill Hill East should be used with regard to the Local Plan Policy for the Mill Hill East area.

It is noted that the AAP was adopted in January 2009. The AAP, whilst including guidance in respect of the Curry Rise and Bray Road Estate, refers largely to the redevelopment of Millbrook Park which has now largely been built out. A number of the policies in the AAP have been superseded by the London and Barnet Local Plan. While the AAP is useful, any development should be assessed in accordance with the policies in the development plan in the first instance.

#### Map 3E

The Curry Rise and Bray Estate is identified on Map 3E and STHAL objects to the omission of the site on this map.

*Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.*

**Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with respect to the matters you have identified in Question 3 above.**

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

Paragraph A

To ensure that the spatial strategy is aligned with all relevant policies, the suggested amended wording to the policy is outlined below (additions shown in bold):

*This includes development at Mill Hill East Station, Watchtower House and Kingdom Hall, IBSA House and Millbrook Park **and the Curry Rise and Bray Road Estate.***

Paragraph B

To ensure that the Local Plan is reflective of the existing context, including previous allocations that have been largely built out, the suggested amended wording to the policy is outlined below:

*Proposals within Mill Hill East must be supported by a Transport Assessment (TA) ~~setting out~~ **which assesses whether any additional** public transport **improvements are required** and demonstrating how sustainable transport options will be provided, **where applicable.***

Map 3E

The Curry Rise and Bray Estate should be identified on Map 3E.

**Declaration of consent**

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

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

**Signature:** hgh Consulting on behalf of Springboard Two Housing Association Limited  
**Date:** 18 June 2024



Main Modifications  
Local Plan

Representations Form

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**PART B - Your representation**

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

**Question 1: To which Main Modification does your representation relate?**

*Representations must be made on a specific Main Modification (MM) or Policies Map change*

MM Number: MM28 Policy: GSS10 Paragraph \_\_\_\_\_

Figure/Table \_\_\_\_\_ Policies Map change \_\_\_\_\_

**Question 2: Do you consider that the Main Modification is:**

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

- |  |   |  |
|--|---|--|
| a) Legally compliant                     | Yes <input checked="" 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 checked="" type="checkbox"/> | No <input type="checkbox"/>            |

**Question 3: Please give details of why you consider the Main Modifications is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

*Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.*

Policy GSS10 identifies the Council's anticipated provision of new homes through estate regeneration.

As detailed in the response to Policy GSS07 and set out in the accompanying covering letter, since the closure of the Examination in Public in November 2022, Notting Hill Genesis ("NHG") has made the decision to regenerate the Curry Rise and Bray Road Estate in Mill Hill. This is due to subsidence which has made several blocks unsafe which has resulted in NHG having to temporarily decant residents.

The proposals will involve the demolition of the existing 143 homes and regeneration of the estate to provide up to 340 homes (including the re-provision of all affordable homes).

Policy GSS10 as currently drafted does not make reference to the Curry Rise and Bray Road Estate as a housing estate for renewal. STHAL object to the omission of the Curry Rise and Bray Road Estate and as such the plan is neither positively prepared or justified.

Policy GSS10 should make reference to the redevelopment of the Curry Rise and Bray Road estate and include it as part of the anticipated provision of 3,980 homes delivered within the local plan period. The projected number of homes being delivered should be amended to reflect the indicative capacity of c. 340 homes (an uplift of circa 200 homes being provided as part of the Curry Rise and Bray Road estate regeneration).

**Continue on a separate sheet if necessary**

**Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with respect to the matters you have identified in Question 3 above.**



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To ensure the policy is reflective of the regeneration of the Curry Rise and Bray Road Estate coming through within the plan period, the suggested amended wording has been outlined below (change in bold):

*The housing estates for renewal or infill include Grahame Park, Douglas Bader, Upper and Lower Fosters, West Hendon, Dollis Valley, Granville Road ~~and~~ Westhorpe Gardens, **and the Curry Rise and Bray Road Estate.***

**Please note:**

*In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s).*

**Declaration of consent**

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**Signature:** hgh Consulting on behalf of Springboard Two Housing Association Limited

**Date:** 18 June 2024



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**PART B - Your representation**

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

**Question 1: To which Main Modification does your representation relate?**

*Representations must be made on a specific Main Modification (MM) or Policies Map change*

MM Number \_\_\_MM50\_\_\_ Policy \_\_\_CH07\_\_\_ Paragraph \_6.22.3\_\_\_

Figure/Table \_\_\_\_\_ Policies Map change \_\_\_\_\_

**Question 2: Do you consider that the Main Modification is:**

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

- |  |   |  |
|--|---|--|
| a) Legally compliant                     | Yes <input checked="" 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 checked="" type="checkbox"/> | No <input type="checkbox"/>            |

**Question 3: Please give details of why you consider the Main Modifications is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

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The proposed modification to Policy CDH07 states that “existing trees of value should be retained wherever possible. Retained trees must have their stems, canopy and root systems safeguarded. Where trees are removed, they should be replaced with trees of equal value and of suitable sizes and species. In circumstances where it is demonstrated that it would not be possible to provide replacement trees on site to the value removed, a contribution to the Council for any residual value may be made to provide trees within nearby streets and open spaces. This may be secured using a planning obligation (our emphasis)”.

Accompanying text in para 6.22.3 states: “Consequently, when trees are removed the asset is degraded and the compensation required in terms of substitute planting to replace services should be based on a recognised tree valuation method such as Capital Asset Valuation of Amenity Trees (CAVAT)”.

There is some conflict between the wording in the policy and the accompanying text. The policy wording states that where it is not possible to provide replacement trees on site, a contribution may be made to provide street trees, whereas the accompanying text suggests that compensation will be required for the loss of trees.

It is important that the policy is reasonable and does not overlap with the mandatory development requirements associated with Biodiversity Net Gain and London Plan Policy G5 Urban Greening Factor. There is a real risk that requiring a payment for replacement trees based on the tree valuation method such as CAVAT, in addition to the BNG payment and the cost of providing new trees and high quality landscaping on the development site risks making a scheme unviable, resulting in the loss of delivery of housing. STHAL object to this policy as it has not been positively prepared.

**Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with respect to the matters you have identified in Question 3 above.**

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

The following text in part e) of the policy should be amended to make clear that a contribution to the Council should only be made where the Council considers it to be necessary.

*In circumstances where it is demonstrated that it would not be possible to provide replacement trees on site to the value removed, a contribution to the Council for any residual value may be made to provide trees within nearby streets and open spaces **if considered to be necessary by the Council and subject to the viability of a scheme.***

Accompanying text in para 6.22.3 should be amended to:

*Consequently, when trees are removed the asset is degraded and the compensation **is considered to be required by the Council and would not have an adverse impact on the viability of the scheme** in terms of substitute planting to replace services should be based on a recognised tree valuation method such as Capital Asset Valuation of Amenity Trees (CAVAT).*

**Continue on a separate sheet if necessary**

**Please note:**

*In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s).*

**Declaration of consent**

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

**Signature:** hgh Consulting on behalf of Springboard Two Housing Association Limited

**Date:** 18 June 2024



**Main Modifications  
Local Plan**

Representations Form

Ref:

(For official use  
only)

**PART B - Your representation**

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

**Question 1: To which Main Modification does your representation relate?**

*Representations must be made on a specific Main Modification (MM) or Policies Map change*

MM Number: MM64 Policy: ECC01 Paragraph \_\_\_\_\_

Figure/Table \_\_\_\_\_ Policies Map change \_\_\_\_\_

**Question 2: Do you consider that the Main Modification is:**

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

- |  |   |  |
|--|---|--|
| a) Legally compliant                     | Yes <input checked="" 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 checked="" type="checkbox"/> | No <input type="checkbox"/>            |

**Question 3: Please give details of why you consider the Main Modifications is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

*Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.*

Policy ECC01 A states that growth should be concentrated in accordance with Policy BSS01 within Barnet's Growth Areas and District Town Centres to better mitigate and adapt to the impacts of development on the climate.

As identified in NHG's response to Policy BSS01, to ensure the plan is positively prepared, the policy should make reference to the Mill Hill East area where growth is also encouraged.

**Continue on a separate sheet if necessary**

**Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with respect to the matters you have identified in Question 3 above.**

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

To ensure that the spatial strategy is aligned with all relevant policies, the suggested amended wording to the policy is outlined below (change in bold):

*Concentrate growth in accordance with Policy BSS01 within Barnet's Growth Areas and District Town Centres in order to better mitigate and adapt to the impacts of development on the climate **and in areas identified for housing growth in accordance with Housing Policy GSS01***

**Continue on a separate sheet if necessary**

**Please note:**

*In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s).*

**Declaration of consent**

The personal information you provide on this form will be processed in accordance with General Data Protection Regulations 2018 (GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004 (as amended), and may be used by the Council to contact you if necessary, regarding your



submission. Your name, name of organisation, and comments, will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

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

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**Main Modifications  
Local Plan**

Representations Form

Ref:

(For official use  
only)

**PART B - Your representation**

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

**Question 1: To which Main Modification does your representation relate?**

*Representations must be made on a specific Main Modification (MM) or Policies Map change*

MM Number: MM81 Policy: \_\_\_\_\_ Paragraph \_\_\_\_\_

Figure/Table: List of Sites – Summary Table Policies Map change \_\_\_\_\_

**Question 2: Do you consider that the Main Modification is:**

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

- |  |   |  |
|--|---|--|
| a) Legally compliant                     | Yes <input checked="" 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 checked="" type="checkbox"/> | No <input type="checkbox"/>            |

**Question 3: Please give details of why you consider the Main Modifications is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

*Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.*

The Schedule of Site Proposals includes several sites in Mill Hill East including IBSA House, Mill Hill East Station, Mill Hill Library, Watchtower House and Kingdom Hall and Watford Way and Burns Lane.

The Curry Rise and Bray Road Estate is not included in the Schedule of Site Proposals. The site and the proposed redevelopment of the estate should be identified as part of the upcoming project housing figures for Mill Hill East as this will form a significant part of the upcoming mix. STHAL objects to the omission of the Curry Rise and Bray Road Estate from the Schedule of Site Proposals and the plan has not been positively prepared.

**Continue on a separate sheet if necessary**

**Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with respect to the matters you have identified in Question 3 above.**

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

Suggested text for the inclusion of the Curry Rise and Bray Road Estate in the Schedule of Site Proposals is provided on Page 4 of this document.

**Please note:**

*In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s).*

**Declaration of consent**

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**Suggested modifications to Annex 1: Schedule of Site Proposals**

Site number X	Curry Rise and Bray Road Estate
Site Address	Curry Rise and Bray Road, Mill Hill, London, NW7 1SD, NW7 1SE, NE7 1SJ & NW7 1SL
Ward	TWE
PTAL 2019	2
PTAL 2031	2
Site size	Approximately 2.7 ha
Ownership	Private
Site source	
Context type	Suburban
Existing or most recent site use/s	Residential (C3)
Development timeframe	0-5 Years
Planning designations	'Specific proposal site' relating to the Mill Hill East AAP
Relevant planning applications	Planning application reference W01708Q for "Use of housing built for occupation by Ministry of Defence Personnel for general housing" at Former Inglis Barracks, Bittacy Hill London NW7 was approved on the 6th September 1995.
Site description	<p>The estate is comprised of 143 homes made up of 132 flats in 11 blocks and 11 terraced houses, with associated landscape, parking and access roads covering approximately 2.7 hectares. The existing residential development is between 2-3 storeys in height.</p> <p>Vehicular and pedestrian access to the housing within the estate is via Curry Rise or Bray Road, both of which adjoin Inglis Way which runs along the southern boundary of the site.</p> <p>The site is adjacent to the comprehensive redevelopment of Millbrook Park to the south and east. Bittacy Hill park is located to the west of the site.</p>
Indicative residential capacity	c. 340 homes
Justification	<p>The need for redevelopment of the estate has arisen as a result of a combination of ground conditions, the original construction and subsequent alterations made to the blocks and the presence of trees which has resulted in a number of the blocks suffering from major subsidence issues. The costs to remediate the problems above are substantial.</p> <p>STHAL has undertaken feasibility work which has concluded that a more sustainable approach will involve the demolition of the existing properties and their replacement with new homes, as well as the provision of additional homes resulting in an uplift in housing.</p>

<p>Site requirements and development guidelines</p>	<p>The proposals will consist of a comprehensive, residential redevelopment of the estate which integrates with the neighbouring redevelopment of Millbrook Park.</p> <p>All existing residents including those who have already been decanted from the estate due to the conditions of their flat blocks will be offered the opportunity to be rehoused on the Estate. Re-provision of affordable housing will be in accordance with London Plan Policy H8 and the Mayors Good Practice Guide for Estate Regeneration.</p> <p>An uplift in the overall housing provision is proposed.</p> <p>A key design principle is the retention of a green space at the centre of the estate and the integration of the landscape and proposed buildings.</p> <p>Safe pedestrian routes through the site to connect the site to Millbrook Park, Inglis Way and Bittacy Hill.</p> <p>Car parking spaces will be re-provided for existing residents. A lower level of car parking is proposed for Phase 2 along with disabled and visitor spaces.</p> <p>To ensure that the majority of residents on the Estate only have to move once, it is proposed that the Estate will be developed over two phases. The first phase will involve the demolition of the four worst affected blocks as well as an additional block in the southwestern corner of the Estate and construction of new buildings in this area. Residents of the remaining blocks will be able relocate before their blocks need to be demolished. It is intended that the first phase will comprise entirely of replacement affordable housing.</p>
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