

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	Ms	
First name	Josephine	
Surname	Vos	
Job Title (where relevant)	████████████████████ ████████████████	
Organisation name (where relevant)	██ ████████	
Email address (where relevant)	████████████████████████████████████	
Telephone number	████████████████	
Address line 1	██ █████	
Address line 2	████████████████████████████████████	
City/Town	████████	
Postcode	████████	

Country	UK	
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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
TRANSPORT FOR LONDON REPRESENTATIONS**

Red = TfL suggested additional text

~~Red strikethrough~~ = TfL suggested deletion of text

MM Number	Policy	Representations
MM13	Policy GSS01 Delivering Sustainable Growth	<p>In part B we note the amended list of public transport infrastructure projects. We recommend that minor amendments are made to the project descriptions as shown in red below:</p> <p>c) An upgraded and enlarged Colindale Underground station providing step free access and enhanced public transport interchange; New underground station and enhanced public transport interchange at Colindale;</p> <p>d) New London Overground passenger rail line - the West London Orbital Line together with upgrades to existing stations (Cricklewood and Hendon) and new station at Brent Cross West;</p> <p>e) New bus stopping and standing arrangements including drivers facilities in within and around North Finchley to allow redevelopment of the bus station;</p>
MM15	Policy GSS02 Brent Cross Growth Area	We note the proposed changes to the list of transport improvements in part C.
MM16	Policy GSS03 Brent Cross West (Staples Corner) Growth Area	<p>In part C we welcome the addition of the following:</p> <p>‘The Council will support development proposals that facilitate access to and delivery of the WLO. Contributions may be sought from developments in the Growth Area towards delivery of the WLO.’</p>

MM18	Policy GSS04 Cricklewood Growth Area	<p>In part B we welcome the amended list of infrastructure requirements:</p> <p>‘The Council will support development proposals that facilitate access to and delivery of the West London Orbital (WLO). Contributions may be sought from developments in the Growth Area towards delivery of the WLO. Development proposals (in accordance with the NPPF and CIL Regulations) will be required through detailed design, planning conditions and/ or contributions secured through planning obligations / legal agreements to deliver or contribute to the following infrastructure:</p> <ul style="list-style-type: none"> a) new/improved active travel routes to Cricklewood station; b) improved interchange, onward travel facilities at Cricklewood station; c) public realm outside Cricklewood station; and d) deliver improvements to streets for pedestrians and cyclists in line with the Healthy Streets Approach.’
MM20	Policy GSS05 Edgware Growth Area	<p>In part B we welcome the inclusion of b:</p> <p>‘Interchange improvements. Bus operations and the function of the bus station must be protected or re-provided as part of any redevelopment. London Underground infrastructure and operations must also be maintained.’</p>
MM22	Policy GSS06 Colindale Growth Area	<p>In part A we welcome the inclusion of c(i):</p> <p>‘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 redevelopment of adjacent land owned by TfL and others.’</p> <p>In part B we welcome the amended description in b:</p> <p>‘new Colindale Underground Station ticket hall building with step-free access to the platforms and sufficient gate-capacity for the growing population in the area. All development within 1km of Colindale Underground station will be expected to contribute towards station improvements, including step-free access and capacity enhancement, and provision of additional cycle parking.’</p>

MM24	Policy GSS07 Mill Hill East	<p>In part B we welcome confirmation that:</p> <p>'The TA must take into account the cumulative impacts arising from other committed development.'</p>
MM27	Policy GSS09 Existing and Major New Public Transport Infrastructure	<p>We broadly welcome the changes to this policy including clarification regarding PTAL and the redevelopment of car parks. In part B of the Policy we suggest the following minor amendment shown in red to ensure consistency with other wording used in the Local Plan e.g. in 4.7:</p> <p>'The potential major transport infrastructure upgrades of the West London Orbital (WLO) and Crossrail 2 would provide <u>broad locations opportunities</u> for <u>design-led growth</u> in Barnet through developing new stations or upgrading the capacity of existing stations and allowing higher density developments to be achieved or accelerated. Proposals on sites in proximity to these public transport improvements will be expected to deliver a density and quantum of residential units which optimise their potential <u>in accordance with the design-led approach</u>.'</p> <p>There should be further amendments to paragraph 4.23.2 to reflect the latest position on West London Orbital as shown in red:</p> <p>4.23.2 The WLO will deliver a passenger service along existing rail tracks between Hounslow/Kew Bridge and Hendon/ West Hampstead Thameslink, passing through Old Oak Common, Neasden, Brent Cross West and Cricklewood. The WLO would have positive impacts through supporting and accelerating unlocking housing delivery and creating improving access to leisure, community and amenity opportunities along the corridor. Delivery is expected <u>in years 11 to 15 of this Plan</u> by 2026 at the earliest.</p>
MM29	Policy GSS11 Major Thoroughfares	<p>We broadly welcome the changes to this policy including clarification regarding the TLRN and Healthy Streets.</p>
MM30	Policy GSS12 Redevelopment of Car Parks	<p>We welcome the changes and clarifications to this policy.</p>

MM45	Policy CDH03 Public Realm	We broadly welcome the changes to this policy including clearer references to Heathy Streets, reducing car usage and having regard to TfL's Streets Toolkit for wayfinding signage.
MM58	Policy CHW02 Promoting health and well-being	In part C we welcome amendments to h: 'Reducing car dependency, promoting active travel and encouraging sustainable modes of travel with regard to Policy TRC01.'
MM61	Policy ECY01 A vibrant local economy	In part D we welcome amendments to e: 'Expecting all development proposals for new employment space that will generate significant amounts of movement to provide travel plans and/or Transport Assessments or Transport Statements in accordance with national policy, London Plan Policy T4 and Policy TRC01.'
MM71	Policy TRC01 Sustainable and active travel	We broadly welcome changes to this policy.
MM72	Policy TRC02 Transport infrastructure	We broadly welcome changes to this policy including reference in part A to facilitating contributions towards new transport infrastructure including the amended list of projects. However, we recommend amended/reinstated wording as shown in red to ensure references to Colindale station and the West London Orbital are consistent with wording in policy GSS01 part B. c) <u>An upgraded and enlarged Colindale new Underground underground station</u> providing step free access and enhanced public transport interchange and enhanced public transport interchange at Colindale. d) A new <u>London Overground</u> passenger rail line – the West London Orbital the West London Orbital Line together with upgrades to existing stations (Cricklewood and Hendon) and the new station at Brent Cross West) on the line

MM73	Policy TRC03 Parking management	<p>We welcome many of the changes to the actual policy which brings it into closer alignment with the approach to parking set out in the London Plan.</p> <p>However, we see no justification for the proposed new wording in paragraph 11.12.7 which allows flexibility in the application of parking standards for the early phases of a large-phased development by stating that:</p> <p>‘With regards to larger scale phased development, particularly within Growth Areas, the Council will, take a flexible approach to parking ratios in the early phases as long as the overall quantum does not exceed the maximum car parking standards.’</p> <p>This appears to be the introduction of a new approach which was not subject to consultation at Regulation 19 stage. Although it does not appear in the policy itself (and should therefore carry limited weight) it could undermine the application of the policy by allowing higher levels of car parking than the London Plan would permit in the early phases. It is common with multi phase developments that only the early phases are built according to the original permission. This is often subsequently amended through a section 73 application or a completely new outline application is submitted. Although there may be a different approach to car parking taken in early phases before all the infrastructure is in place, the parking for each phase should still be within London Plan maximum standards to avoid undermining the policy. The wording should be amended as shown in red to make this clear:</p> <p>‘With regards to larger scale phased development, particularly within Growth Areas, the Council will, take a flexible approach to parking ratios in the early phases as long as the overall quantum for each phase does not exceed the maximum car parking standards.’</p> <p>In part A of the policy and paragraph 11.12.6 an approach to the issuing of residents’ parking permits for new developments in CPZs is set out. The issuing of additional parking permits to new residents could increase the number of cars that can be parked contrary to the aim of limiting parking at new developments and adding to</p>
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		<p>parking pressures for existing residents in the area. It would be better to adopt a permit free policy for new residential developments in CPZs even where some car parking is being provided on site.</p> <p>We welcome the removal of references to ‘orbital’ PTAL in table 20 – residential parking standards.</p>
MM75	Chapter 12 Delivering the Local Plan	We welcome clarification that ‘in delivering the Local Plan the Council will utilise London Plan Policy DF1, particularly with regards to the prioritisation of Planning Obligations’.
MM76	Chapter 12 Delivering the Local Plan (Monitoring Indicators)	We welcome the inclusion of measures 57 and 58 relating to parking management and mode share targets.
MM105	Site 24 East Finchley station car park	We welcome clarification in the site requirements that ‘Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.’
MM108	Site 27 Edgware town centre	We welcome clarification in the site requirements that ‘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.’
MM109	Site 28 Edgware Underground and bus stations	<p>We welcome amendments to the proposed use which now refers to ‘...limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.’</p> <p>We welcome clarification in the site requirements that ‘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>
MM111	Site 30 Finchley Central station	<p>We welcome amendments to the proposed use which now refers to ‘...limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons...’</p> <p>We welcome clarification in the site requirements that ‘Provision of transport infrastructure should be consistent with Policy TRC02. Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.’</p>

MM114	Site 33 Bunns Lane car park	We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'
MM115	Site 34 Burroughs Gardens car park	We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'
MM116	Site 35 Egerton Gardens car park	We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'
MM119	Site 39 The Burroughs car park	We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'
MM121	Site 41 PDSA and Fuller Street car park	We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'
MM123	Site 43 Army Reserve Depot	We welcome clarification in the site requirements that 'Improvements to streets and the public realm should be delivered in line with the Healthy Streets Approach.'
MM124	Site 44 High Barnet station	<p>We welcome amendments to the proposed use which now refers to '...limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons...'</p> <p>We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12' and that 'Residential-led mixed use development must reflect the 'Healthy Streets Approach' with improved interchange facilities for pedestrians and cyclists, providing the necessary transport infrastructure with regard to Policy TRC02.'</p>
MM127	Site 47 Mill Hill East station	<p>We welcome amendments to the proposed use which now refers to '...limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.'</p> <p>We welcome clarification in the site requirements that '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>

MM130	Site 50 Watford Way and Bunns Lane	We welcome clarification in the site requirements. However, we recommend that the text is amended as shown to provide greater flexibility in terms of operational requirements: 'In the event that TfL requires part of the site adjacent to the A1 to support transport operations, this use must be carefully sited and designed to ensure a suitable living environment of new and existing housing is maintained.'
MM133	Site 53 Allum Way	<p>We welcome amendments to the proposed use which recognises potential TfL operational requirements and addresses concerns about car parking so that it now reads 'Residential led mixed use development with transport infrastructure (if there is an operational requirement by TfL), commercial (office and light industry), community and limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons, reflecting the site's accessible location and encouraging the use of public transport and active modes of travel.'</p> <p>We welcome amendments to the first paragraph of the site requirements which now reads '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 may be appropriate. Station functions must be maintained and development must safeguard station operations in line with the agent of change principles. Landowners should work with TfL and the Council to identify a comprehensive scheme.'</p> <p>We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'</p>
MM135	Site 55 Woodside Park Station East	<p>We welcome amendments to the proposed use which now refers to '...limited commuter car parking with the aim to re-provide only where essential, for example for disabled persons or operational reasons.'</p> <p>We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'</p>
MM138	Site 58 811 High Road and Lodge Lane car park	We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'

MM141	Site 61 Tally Ho Triangle	We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'
MM142	Site 62 Tesco Finchley	We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'
MM144	Site 64 744–776 High Road	We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.'
MM147	Site 67 Great North Leisure Park	We welcome clarification in the site requirements that 'Proposals for redevelopment of car parking spaces must meet the requirements of TRC03 and have regard to Policy GSS12.' However, it is not clear why the requirement that 'Due to the low PTAL, proposals should include measures that contribute towards modal shift away from private car use to more sustainable means of transport' has been deleted. Given the car dominated nature of the site we would expect that measures will be required to achieve mode share targets including limited provision of car parking and improvements to connectivity.