

London Borough of Barnet

Schedule of responses and council changes to the

Cricklewood, West Hendon and Brent Cross Chapter of the draft Unitary Development Plan



January 2003

- Notes: 1. the r.j. refers to the reasoned justification or the paragraphs that justify the policies,
2. The reference numbering is based on an objector reference followed by a comment reference number.

Cricklewood, West Hendon and Brent Cross Regeneration Area

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General

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|--------------------------|------------|-----|----------|
| Support | Ken | Greater London Authority | | | |
| 188 /2091 | Livingstone | | | | |
| Comment | | | | | |
| The Mayor broadly welcomes the chapter and its policies. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------|---|------------|-----|----------|
| Object | Anita | Drivers Jonas | | | |
| 369 /2230 | Young | Department of Health and Social Care - London | | | |
| Comment | | | | | |
| Significant changes have been made recently in the provision of health care facilities. The UDP needs to be updated to reflect these changes. ie Consultation with Regional Office for DoHSC, Health Authority, NHS Trusts, GPs and awareness of LIFT project to improve provision of health infrastructure. | | | | | |
| Barnet council response | | | | | |
| This will be a detail of the process that will be undertaken rather than a planning policy issue for this chapter. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|--------|--------------------------|------------|-----|----------|
| Support | Peter | DEFRA | | | |
| 344 /1977 | Briggs | | | | |
| Comment | | | | | |
| The Department does not wish to make any policy-specific or detailed comments. However, DEFRA welcomes the overall strategic approach of the draft chapter, that seeks to optimise the use of brownfield land which effectively comprises the subject area, in ways that are economically, socially and environmentally sustainable. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------|---------------------------------------|------------|-----|----------|
| Object | Jean | Woolmead Avenue Residents Association | | | |
| 285 /1985 | Ivatt | | | | |
| Comment | | | | | |
| The area has the highest pollution in the country. We have the A5, M1 and North Circular Road on our doorstep. As far as we can see, the proposed regeneration does nothing to improve this problem, but will exacerbate the situation by attracting more cars and delivery lorries. | | | | | |
| Barnet council response | | | | | |
| One of the aims of this chapter is to encourage greater use of public transport in the future. This issue is not peculiar to this area of London and is addressed in chapter 3 (Environmental Resources), chapter 7 (Movement) and in the council's Air Quality Action Plan. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|--------|--------------------------|------------|-----|----------|
| Support | Rodney | | | | |
| 343 /1978 | Fenlon | | | | |
| Comment | | | | | |
| Supports high density housing. Supports improvements to public transport and rapid transport link, in order to reduce car-use. Supports improvements to Brent Cross shops. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|--------------------------|------------|-----|----------|
| Object | Keith | Railfuture London Branch | 1.1 | 1.3 | |
| 368 /2265 | Dyall | Railfuture | | | |

Comment

The council seems concerned with maximising commercial and retail development in conjunction with developers in spite of the enormous cost of moving the infrastructure to less satisfactory locations. It is clear that in order to cover costs, large amounts of business property will have to be built. The proposals for the area present a poor legacy for the future.

Barnet council response

Detail of the location/siting of development will be considered at the masterplan stages, that will be the subject of consultation in due course.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------|--------------------------|------------|-----|----------|
| Object | James | Strategic Rail Authority | 1.1 | | |
| 81 /2159 | Lough | | | | |

Comment

Should not refer to the land being largely unused but be more positive about the operational parts. Change second sentence of paragraph 1.1 to state;

"The railway land contains a range of uses including rail related facilities that require consolidation and enhancement in this strategic location for road and rail routes in north London. The area also includes Brent Cross Shopping Centre."

Barnet council response

see change 357/2068

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|----------|--------------------------|------------|-----|----------|
| Object | Philippa | Freight on Rail | 1.1 | | |
| 357 /2068 | Edmunds | | | | |

Comment

Freight on Rail would like to make the point that Cricklewood is not "railway land which is largely unused", it is existing operational railway land with a rail freight terminal and waste disposal plant using rail freight.

Barnet council response

Agree

Change document?

State in para 1.1 that " The railway land, some of which is unused, has.."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Mason Richards Planning | | | |
| 354 /2035 | Fenwick | Castlemore Securities Ltd | | | |

Comment

The chapter could benefit from a clear statement within the opening paragraphs, as to the aims and objectives for the regeneration area. These should be simple, concise and limited in their extent. They might constitute a 'Vision Statement' along the following lines:

"The aims and objectives for the Regeneration Area are to:

- regenerate the local economy through the provision of new employment opportunities
- provide environmental improvement for those who live and work within the Regeneration Area
- to provide for the inclusion of all those with an interest within the Regeneration Area"

Barnet council response

The aims and objectives are set out in paragraphs 1.1 to 1.3 of the chapter.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Delle | Brent (London Borough of) | 1.1 | | |
| 102 /1993 | Odeleye | | | | |

Comment

Object to wording: "...surrounded by some of London's most deprived communities" in para 1.1.

In fact, Map of deprivation in the Draft London Plan shows that deprivation is focused further west within Ealing and Brent. Suggest more accurate wording is used.

Barnet council response

Agreed

Change document?

Add "close to" rather than "surrounded by" in para 1.1

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Railfuture London Branch | | | |
| 368 /2336 | Dyall | Railfuture | | | |

Comment

There needs to be an agreement with the SRA and the Office of the Rail Regulator before land is disposed of. If there is a disagreement and land is disposed of then CPO powers maybe used later by these bodies. An agreement will save the necessity for costly litigation.

Barnet council response

The issue of who owns land and how it will be disposed of is not appropriate for the UDP. The use of CPO powers by the council is referred to in a changed paragraph to policy C11.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Robert | Freightliner Group | 1.1 | | |
| 364 /2175 | Goundry | | | | |

Comment

The railway land at Cricklewood is "largely unused"(para 1.1) because of the long running planning uncertainties which have affected it.

Barnet council response

The council is addressing this through the regeneration scheme.

Change document?

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|----------|----------------------------------|------------|-----|----------|
| Object | Nicki | Nathaniel Lichfield and Partners | 1.2 | | |
| 370 /2243 | Mablesen | Capital Shopping Centres | | | |

Comment

Capital Shopping Centres support the significant investment which will be focused in this area which will enable the regeneration of the surrounding communities in Barnet and adjoining boroughs. However, it is considered that priority should be given to the regeneration of the existing town centres which already provide for the local community and are well linked to the surrounding area by a range of means of transport before a new centre is developed in this area. Specific reference should be made at the outset of the new chapter to prioritising the regeneration of existing town centres to serve the surrounding communities.

Barnet council response

The council has clear objectives to secure the vitality and viability of town centre and these are set out in the town centre chapter of the UDP.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|--------|--------------------------|------------|-----|----------|
| Object | Twiggy | Metropolitan Police | 1.2 | | 3 |
| 349 /2010 | Shrub | | | | |

Comment

Amend the text to read ". . . Major landowners, local communities and local police to identify. . . "

Barnet council response

Agreed but shall widen to stakeholders

Change document?

Add "stakeholders" after "local communities" in para 1.2

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|-------------------------------|------------|-----|----------|
| Object | Mary | GVA Grimley | 1.3 | | |
| 180 /2220 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Need to add that the

"The policies of the UDP provide the planning context for deciding any planning applications and along with the Council's approved supplementary planning guidance for Cricklewood, West Hendon [and Brent Cross], this Chapter [will form the basis of the development] framework that will be required to guide the area's regeneration."

Barnet council response

Agree clarification is needed.

Change document?

Add after "West Hendon" in paragraph 1.3; ", will create the basis of a Development Framework to guide the area's regeneration."

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|---------------------------|------------|-----|----------|
| Object | Keith | Mason Richards Planning | 1.3 | | |
| 354 /2038 | Fenwick | Castlemore Securities Ltd | | | |

Comment

At a general level, the objectives of the Additional Chapter are supported. The idea of identifying a specific area for urban regeneration, including Development Plan Policies, which support and guide that regeneration, and provide a clear direction to those, who use the planning system, is to be welcomed. There is an underlying assumption to the Additional Chapter that an 'outline proposal/application' will be made for the whole regeneration area. This is an unrealistic aspiration where there are multiple landowners, with differing interests. Detailed observation is made on this further below. It is submitted that if the Council were to adopt this Additional Chapter as drafted, and 'await the submission of an outline proposal', then there is a very real danger that the objectives of the chapter would not be achieved, as no such proposal will come forward and the good intentions expressed through the Additional Chapter will be left to stagnate.

Lastly in respect of the general comments, there is an uneasy overlap between the Additional Chapter to the UDP and the 'Cricklewood and West Hendon Regeneration Area: Regeneration Brief', approved in April 2001.

Paragraph 1.3 of the Additional Chapter indicates that the UDP should be read "...along with the Council's approved Supplementary Planning Guidance for Cricklewood and West Hendon". Given that the Additional Chapter, and the Regeneration Brief send out slightly mixed messages in terms of how regeneration is to be achieved, and their respective policies, it is suggested that the Council either limit comment within the Unitary Development Plan to a simple enabling policy making reference to the Brief, or alternatively, and more preferably given the weight to be attached to Section 54A Development Plan policies, the Additional Chapter should supersede the content of the Regeneration Brief. This will provide for a simplified and clarified statement of planning policy in respect of the regeneration area.

Barnet council response

Agree that clarification is required as to the relation with the Brief and the UDP.

Change document?

Add to end of para 1.3 "Once the draft UDP is adopted, the council will withdraw the supplementary planning guidance."

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|--------------------------|------------|-----|----------|
| Object | Nick | English Nature | 1.3 | | |
| 269 /1970 | Radford | | | | |

Comment

With regard to the text of the proposed new chapter, English Nature object to the reliance on the supplementary planning guidance (SPG) produced for the area, as stated in paragraph 1.3. English Nature has previously made representations regarding the content of the SPG and I attach these for your information. We have strongly objected to the content of the SPG as it fails to make reference to the nature conservation importance of the Brent Reservoir. Whilst clearly the SPG is not being consulted upon here, if this problem is not rectified it could lead to conflicts between policies within the UDP itself. It could also cause problems for potential developers due to the likely weight, which will be attributed to the SPG given that it is specifically referred to in the development plan. If reference is to be retained, and reliance placed upon the SPG in the body of the UDP, there needs to be a clear consideration of nature conservation matters within it.

Barnet council response

The policies protecting SSSIs are contained in the draft UDP chapter "Open Environment" and in the changed r.j. to policy C4 on sustainable development.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|------------|---|------------|-----|----------|
| Object | Julian | Montagu Evans | 1.3 | | |
| 360 /2094 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

If a framework can be agreed, this will supersede the previous SPG.

Should state "It is anticipated that a new planning policy framework will be prepared. If adopted as supplementary planning guidance, this will supersede the Cricklewood and West Hendon Regeneration Area Brief."

Barnet council response

Agree in principle and see changes made under 354/2038

Change document?

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------|--------------------------|------------|-----|----------|
| Object | James | Strategic Rail Authority | 1.4 | | |
| 81 /2162 | Lough | | | | |

Comment

Need to refer to the PPG and other policy guidance such as the Transport White Paper, Sustainable Distribution (March 1999) and Ten Year Transport Plan (July 2000).

Barnet council response

Agree

Change document?

Add before first sentence of paragraph 1.4;

"The Government's Planning Policy Guidance Notes and the Urban White Paper (2001) encourage the better use of underused and previously developed land, especially when accessible by means of transport other than the car. The White Paper stresses the need to create an urban renaissance ..."

and delete second sentence and substitute;

"PPG13, The Transport White Paper, the Ten Year Transport Plan and Sustainable Distribution documents aim to reduce the need for car usage, setting challenging targets for passenger and freight growth and seeking to transfer freight from road to rail."

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|--------------------------|------------|-----|----------|
| Object | Keith | Railfuture London Branch | 1.4 | | |
| 368 /2266 | Dyall | Railfuture | | | |

Comment

It is Government policy to encourage the use of public transport and reduce the need to travel. With the closure of local shops and construction of shopping malls the reverse has occurred, and the proposals as presently envisaged will increase the pressure on local centres, not only locally, but an ever widening area. The other major Government policy is to encourage the increased use of rail for the carriage of freight. It is becoming difficult for the rail industry to meet Government targets as sidings and freight yards have been built on by local authorities. If a significant rail freight facility is not left, the Government's policy will be in tatters, with unrestricted growth in the use of lorries on our roads.

Barnet council response

Agree

Change document?

See change 81/2162

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.4 | | |
| 188 /2096 | Livingstone | | | | |
| Comment | | | | | |
| highlight qualitative importance/aspiration of redevelopment criteria | | | | | |
| Barnet council response | | | | | |
| Agree | | | | | |
| Change document? | | | | | |
| In the last sentence of paragraph 1.4 replace "high" with "highest". | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Delle | Brent (London Borough of) | 1.4 | | |
| 102 /1994 | Odeleye | | | | |
| Comment | | | | | |
| The Urban White Paper is the only policy document quoted. However, reference should also be made to: | | | | | |
| - Government guidance on town centres in PPG6, and reiterated in PPG13, which are relevant to the proposals in the chapter. | | | | | |
| - PPG1 which highlights sustainable development as a key theme. | | | | | |
| - RPG9 - para 5.12 and Policy Q5c on ensuring vitality and viability of town and local centres. | | | | | |
| Barnet council response | | | | | |
| See change 357/2069 | | | | | |
| Change document? | | | | | |

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | James | Strategic Rail Authority | 1.5 | | |
| 81 /2165 | Lough | | | | |
| Comment | | | | | |
| The description of RPG3 ignores support given to rail and rail freight. | | | | | |
| Barnet council response | | | | | |
| Agree | | | | | |
| Change document? | | | | | |
| Add at end of para 1.5; | | | | | |
| "It {RPG3} recommends that boroughs seek locations for development along routes of major rail infrastructure and integrate safeguarding requirements for rail infrastructure in UDPs." | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Philippa | Freight on Rail | | | 1.5 |

357 /2069 Edmunds

Comment

PPG13 must also be taken into account in the context section. The rail freight facility must also allow for rail freight future growth in the Government 'Ten Year Plan' and the targets for 80 per cent growth in rail freight in this ten year period until 2010. The SRA Strategic Plan of January 2002 and the SRA Freight Strategy of May 2001 stated that 3-4 freight terminals were needed in the Greater London area if this 80 per cent growth was to be realised. Cricklewood is one of the few suitable and available sites to meet this need.

Barnet council response

Agree

Change document?

Add after para 1.4 a new section on "National railway and planning policy" and state;

"Planning Policy Guidance Notes 1, 11, 12 and 13 gives prominence to rail and freight issues. In addition the Government have produced a 'Ten Year Plan' in December 1999 towards providing an integrated transport system. This Plan seeks to increase the volume of rail freight traffic nationally by 80%. This will be implemented through the provision of larger carriages, more punctual and reliable services, with an investment of £4bn in rail and £1.5bn in freight services. The Strategic Railway Authority (SRA) have published a Strategic Plan in January 2002 and a Freight Strategy in May 2001 stating that 3-4 freight terminals are needed in the Greater London area to realise this growth. The strategic objectives of the SRA in their land use planning statement include;

- encouraging increased densities and encouraging use of rail around railway stations; and
- safeguarding and identifying new freight sites, and ensuring both warehousing and intermodal transfer facilities are provided on these sites."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Railfuture London Branch | | | 1.5 |
| 368 /2268 | Dyall | Railfuture | | | |

Comment

This major development does not meet many of the principles which we should be striving for. Improvements to public transport are limited and some times illusory, in spite of large amounts of money proposed for a new station. If Brent Cross is a regional centre, we are talking about an expanded catchment area. If only 25% of customers arrive by bus, we are talking about a lot of cars.

Barnet council response

The council will ensure that significant improvements to public transport take place through section 106 agreements and conditions.

Change document?

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Martin | Scott Wilson | | | 1.6 |
| 372 /2306 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

MHT/ Lovell Construction welcomes the reference in the revised UDP chapter to the emerging London Plan and in particular to its emphasis on sustainable growth which will be achieved through making the best use of previously developed land, maintaining a strong economy, increasing the amount of housing and enhancing the built environment through the quality of development.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | James | Strategic Rail Authority | 1.6 | | |
| 81 /2166 | Lough | | | | |
| Comment | | | | | |
| Need to add reference draft London Plan has on rail and rail freight. | | | | | |
| Barnet council response | | | | | |
| Agree however this is more of an issue for paragraph 1.8 | | | | | |
| Change document? | | | | | |
| Add at end of 2nd sentence of paragraph 1.8; | | | | | |
| "and improve integration of freight transport with other modes of transport." | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Railfuture London Branch | 1.6 | 1.8 | |
| 368 /2270 | Dyall | Railfuture | | | |
| Comment | | | | | |
| Northwest London is not considered an employment priority area by the GLA. It is GLA policy to house key workers in affordable housing which is only partly covered by this scheme. The GLA is determined to reduce car use, and because of limited travel opportunities, this scheme is unlikely to meet these ideals. The existing roads in the area are already at capacity, more traffic will cause congestion over a wide area. | | | | | |
| Barnet council response | | | | | |
| The aim of the regeneration scheme is to create mixed use development with excellent public transport so that people have a choice of means of transport and have less need to travel between work, leisure and home. | | | | | |
| Change document? | | | | | |

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.7 | | |
| 188 /2098 | Livingstone | | | | |
| Comment | | | | | |
| Change the penultimate sentence of the paragraph to correct facts in terms of numbers of housing units and jobs as stated in the draft London Plan. | | | | | |
| Barnet council response | | | | | |
| agree | | | | | |
| Change document? | | | | | |
| In para 1.7 replace "4,000 housing units" with "a minimum of 5,000 new homes, including 4,000 on the Cricklewood part of the site" and "14,500 office based jobs" with "a minimum of 5,000 new jobs but potential to be significantly more jobs creation potential arising from the proposed masterplan exercise and commercial market testing (14,500 office based jobs and other town centre related)." | | | | | |
| | Name | Organisation name/Client | Para start | end | Page no. |
| Object | Ken | Greater London Authority | 1.7 | | |
| 188 /2101 | Livingstone | | | | |
| Comment | | | | | |
| The last sentence beginning "Brent Cross is no longer defined as.." should be changed to correct information as regards the designation of Brent Cross shopping centre within the draft London Plan. | | | | | |
| Barnet council response | | | | | |
| agree | | | | | |
| Change document? | | | | | |
| In para 1.7 Insert "shopping" between "regional" and "centre" and add after "but" "should evolve from an isolated specialist shopping centre into a new town centre offering a full range of services which can only be achieved with the successful integration of land south of the A406 North Circular Road and with it the provision and delivery of improved public transport and accessibility across the area. The new town centre will need to complement the roles of other centres nearby." | | | | | |

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|---------------------------|------------|-----|----------|
| Object | Keith | Mason Richards Planning | 1.7 | | |
| 354 /2041 | Fenwick | Castlemore Securities Ltd | | | |

Comment

The plan should provide a clear definition of the areas it refers to and define what is meant by Brent Cross, Cricklewood and West Hendon as there is conflict between the chapter and the wider UDP.

Barnet council response

The UDP chapter definition is the more up to date definition and further clarification will be made.

Change document?

See change 350/2017 in reference to policy GCrick2 referring to West Hendon.

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|---|------------|-----|----------|
| Support | Martin | Scott Wilson | 1.7 | | |
| 372 /2307 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

Para.1.7 recognises the identification of Opportunity Areas in the draft London Plan and that 'Cricklewood/ Brent Cross is one of these.

MHT / Lovell Construction has lodged an objection to the draft London Plan to the effect that this Opportunity Area should include specific reference to West Hendon in its description. One of the principal reasons for this is to be consistent with the approach taken by LB Barnet in referring to 'Cricklewood/ West Hendon/ Brent Cross' in its revised UDP and because all three locations are interlinked to form one overall regeneration initiative.

Barnet council response

This point is taken (see change under 372/2290 regarding a paragraph to C1 referring to the linkage between the areas)

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|----------|--------------------------|------------|-----|----------|
| Object | Philippa | Freight on Rail | 1.7 | | |
| 357 /2070 | Edmunds | | | | |

Comment

The London context should refer to the need for bulk and aggregates traffic with sufficient warehousing and that Cricklewood has strategic importance and is one of the few remaining suitable sites in Greater London.

It should refer to increasing waste removal by rail and water and the protection of the waste disposal site using rail retaining proper road access.

Barnet council response

Agree

Change document?

Add to the end of para 1.7 to state;

"The London Plan recognises the importance of rail freight in providing an efficient system for the distribution of goods and services. Cricklewood is one of the few rail freight facilities in London."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|---------------------------------------|------------|-----|----------|
| Object | Jean | Woolmead Avenue Residents Association | 1.7 | 1.7 | |
| 285 /1983 | Ivatt | | | | |

Comment

During the last five years, the population of Barnet has increased by 42,000. The regeneration of Cricklewood and West Hendon is going to add approx 20,000 more. This is an unrealistic number for such a small area to absorb and is unacceptable. How can this improve the quality of life for existing residents?

Barnet council response

The growth in population could be 10,000 assuming 5,000 homes are built but this will be over 10-15 years and the scheme will include facilities for the community.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | 1.7 | | |
| 180 /2221 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Need to state the figures as 5,000 jobs and 4,000 homes as minima in the draft London Plan.

There is a statement that Brent Cross is no longer a regional shopping centre but a town centre which is not the description in the draft London Plan.

Barnet council response

Agree

Change document?

See change under 188/2098 and 188/2101

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Donald | Camden (London Borough of) | 1.7 | | |
| 367 /2191 | Chambers | | | | |

Comment

The Draft London Plan in table 2B.7 only proposes 5,000 new jobs for Cricklewood/Brent Cross Opportunity Area and does not identify West Hendon as being able to accommodate an additional 8 500 jobs. Table 3B.4 identifies the whole of the North sub-region as being able to accommodate 13 000 office jobs.

The Draft London Plan does not define Brent Cross as a 'major town centre'. The section on town centres does not mention Brent Cross. In the section on opportunity areas it states that development of Brent Cross as a Town Centre should be 'subject to its development as an integrated entity' and that it should complement other nearby centres.

Consistency with the Draft London Plan is required.

Barnet council response

The council will determine , through the Development Framework & Masterplans, the quantity of jobs; in order to provide an indication at this stage paragraph 1.7 will be changed o as to conform with the emerging London Plan.

Change document?

In 4th sentence delete 4,000 and replace with at least "5,000 homes" and add "at least 5,000 new jobs to 2016". See change at 188/2101

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | 1.7 | | |
| 372 /2308 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

There are conflicting references in the London Plan to both 4000 and 5000 housing units capacity for the Opportunity Area. We suggest that the reference to '4000 housing units' is removed from the revised UDP para.1.7 and replaced by '5000 housing units', although even this figure should be taken as a guideline minimum, to reflect that Opportunity Areas are locations where intensive development is anticipated, supported by high quality access to public transport. This would be the case particularly at West Hendon where major improvements to town centre access will be accompanied by wide-ranging measures to intensify and enhance the quality of substantial areas of existing housing nearby.

Barnet council response

See change 188/2098

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Delle | Brent (London Borough of) | 1.7 | | |

102 /1995 Odeleye

Comment

The statement in the last sentence, implying that the Draft London Plan now defines Brent Cross as a 'major town centre' is incorrect. The Draft Plan (para.2B.101) refers to Brent Cross as a shopping centre and states that 'Subject to its development as an integrated entity, the planning framework should seek the redevelopment of Brent Cross as a town centre...' And according to para.3D.14 of the draft Plan: 'Brent Cross should evolve from a specialist shopping centre to a more balanced town centre...', but the Plan does not include Brent Cross on Map 3D.1 (network of London's town centres) nor is it listed under any of the categories of town centres in Annex 5.

Barnet council response

Agreed

Change document?

Change last sentence of para 1.7 to ;

"Brent Cross will evolve from a specialist shopping centre to become a major town centre with the potential to accommodate a mixture of uses, including retail,."

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | 1.8 | | |
| 372 /2309 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

In para.1.8, we would question the statement that Transport for London is responsible for the A5 as part of the major road network. While this may be true in relation to the co-ordination of public transport services along the route, we believe that physical highway construction matters are the responsibility of LB Barnet and Brent.

Barnet council response

Agree

Change document?

See change 188/2103 where A5 is substituted for by A41

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|-----------------------------------|-------------------|------------|-----------------|
| Object | Eli | Railway Terraces Residents Assoc. | 1.8 | | |
| 361 /2099 | Jones | | | | |

Comment

The paragraph states the GLA is preparing strategies on air quality, waste management and biodiversity. Will these be adopted by Barnet? If so, we feel that the UDP should state that these future standards are to be applied when published.

Barnet council response

It is not for the UDP to contain statements of the council's procedures for adopting the Mayor's strategies.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | James | Strategic Rail Authority | 1.8 | | |
| 81 /2169 | Lough | | | | |

Comment

Other strategies should include working with the SRA

Barnet council response

Agree

Change document?

Add as third sentence;

" It [the Mayor's Transport Strategy] refers to the need to work with the Strategic Rail Authority to ensure suitable existing and new sites are brought forward to enable the transfer of freight from road to rail."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.8 | | |

188 /2103 Livingstone

Comment

The first sentence commencing "The Greater London Authority.." should be changed to correct the information in terms of who is responsible for preparing London wide strategies.

The second sentence should be changed to provide additional information for clarification purposes.

Correction is required in the fourth sentence commencing "Transport for London...": the A5 is not part of the Transport for London Road Network but the A41 is.

Barnet council response

agree

Change document?

In para 1.8 replace "The Greater London Authority" with "The Mayor of London" and insert "Mayor's" between "The" and "transport" and between "The" and "economic".

In paragraph 1.8 delete "The GLA.." to "..Biodiversity" and replace with "The Mayor is preparing and publishing strategies on air quality, waste management, biodiversity and ambient noise".

Delete "A5" and insert "A41" in para 1.8

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Railfuture London Branch | 1.9 | 1.10 | |
| 368 /2273 | Dyall | Railfuture | | | |

Comment

The plan has a negative impact on noise and air pollution and traffic, there is a danger of overdevelopment. At times of peak traffic there will be significant delays to the turn around of refuse vehicles at cost to the borough. It is not clear who will pay for the additional services that the borough supplies, such as school extensions, not necessarily within the development zone, additional health facilities. Railfuture would be happy to see little or no parking, but because there is little chance of modal switch, there will be pressure on Brent Cross and Tesco car parks, which could affect the shopping centres. Hammersons are concerned about this. Depending on the size of the problem, lack of parking spaces could kill the development.

Barnet council response

A way of mitigating the detrimental affects of traffic is to attempt to achieve a shift towards use of public transport. Service providers will be made aware of the potential for new homes with the Framework giving a Delivery Strategy as to how contributions will be made towards the provision of public services.

Change document?

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Anita | Drivers Jonas | 1.10 | | |
| 369 /2231 | Young | Department of Health and Social Care - London | | | |

Comment

The Department of Health and Social Care - London Office (DoHSC) supports and welcomes the Council's positive commitment towards tackling the problems of social exclusion that impact on inequalities in healthcare provision.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Marlene | | | | |
| 351 /2027 | Wardle | | 1.10 | | |
| Comment | | | | | |
| The UDP is not specific enough on limiting pollution levels. There appears to be no specific limits laid down on noise, light and dust levels. | | | | | |
| Barnet council response | | | | | |
| This is a detailed matter not appropriate to be defined in the UDP. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | James | Strategic Rail Authority | | | |
| 81 /2170 | Lough | | 1.10 | | |
| Comment | | | | | |
| Need to state the council's support for rail freight. | | | | | |
| Barnet council response | | | | | |
| There is a need to state the council's support for rail freight. | | | | | |
| Change document? | | | | | |
| Add after 5th sentence; | | | | | |
| "The council supports the role rail freight has to play and seeks to safeguard and encourage the development of freight sites in rail accessible locations." | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|-----------------------------------|-------------------|------------|-----------------|
| Object | Eli | Railway Terraces Residents Assoc. | | | |
| 361 /2100 | Jones | | 1.10 | | |
| Comment | | | | | |
| The air quality strategy aims to reduce the effects of air pollution. Is this the actual statement of the strategy or are there some specific targets laid down? If there are no specific targets this has very little impact. If there are no targets, could the UDP not lay down some, i.e. 20% over 5 years? | | | | | |
| Barnet council response | | | | | |
| It is for the council's air quality action plan to deal with this issue. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Robert | Freightliner Group | | | |
| 364 /2176 | Goundry | | 1.10 | | |
| Comment | | | | | |
| The borough context (para. 1.10) should not give the impression that the waste transfer station is in any way an optional facility, and should make it absolutely clear that the future of domestic waste disposal in North London will require the ability to convey waste in bulk by train to its ultimate disposal point. | | | | | |
| Barnet council response | | | | | |
| Agree | | | | | |
| Change document? | | | | | |
| Add after 6th sentence of para 1.10; | | | | | |
| "In order to convey domestic waste in bulk by train, it is necessary to include a waste transfer station in this vicinity." | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Mason Richards Planning | | | 1.10 |
| 354 /2042 | Fenwick | Castlemore Securities Ltd | | | |

Comment

Reference is made to a 'Regeneration Strategy' that is being prepared.

The role and status of the Regeneration Strategy, its integration with the planning process and the Additional Chapter, is not made clear. The Additional Chapter itself establishes, the regeneration area touches upon all of those eight broad themes, which are established by the Borough's Community Plan. There is a danger by disaggregating policy for a single area identified for regeneration, into several differing plans and strategy documents, that the impetus and direction of regeneration will be lost, that there will be potentially conflicting aims and objectives arising, and that confusion as to the precedents of various strategies will arise.

The Additional Chapter may be seen as the appropriate means whereby all of these elements can be brought into a single coherent strategy, as a 'one-stop shop' for policy guidance.

Barnet council response

The Regeneration Strategy, Community plan and UDP have different purposes. The UDP provides the statutory planning framework for the council to make planning decisions.

Change document?**Paragraph(s)**

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|--------------|---------------------------------|-------------------|------------|-----------------|
| Object | | Barnet (London Borough of) | | | 1.10 |
| 287 /2346 | Regeneration | | | | |

Comment**Barnet council response**

It is considered that traffic speeds cannot always be reduced, for instance in slower roads or where there is congestion, and they can only be managed.

Change document?

Change 12th line from end of para 1.10 to refer to ensuring that traffic speeds are "managed." rather than "reduced"

GCrick -Regeneration of Cricklewood/ West Hendon

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Delle | Brent (London Borough of) | | | |
| 102 /1997 | Odeleye | | | | |

Comment

We object to the proposal to develop a new 'town centre' in this area as part of the expansion of Brent Cross. It is contrary to Government Policy in PPG6 for Regional Shopping Centres and being predominantly car-oriented, is likely to impact negatively on proposals for the regeneration of existing town centres in London's West and North sub-regions. There are very real practical difficulties in effectively linking across the North Circular Road to create a realistic town centre.

Barnet council response

It is a challenge, however the council considers that this is the best way to achieve the regeneration of this opportunity area

Change document?

GCrack2-Regeneration of Cricklewood/ West Hendon

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|-------|--------------------------|------------|-----|----------|
| Object | Keith | Railfuture London Branch | | | |
| 368 /2335 | Dyall | Railfuture | | | |

Comment

The North Circular breaks the centre up and so the thought of the area being a homogenous town centre is unrealistic.

Barnet council response

Policy C7 and paragraphs 1.16 and 1.17 aim to ensure links are provided across this divide and seeks an integration of diverse uses rather than homogeneity.

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|---------|---|------------|-----|----------|
| Support | Martin | Scott Wilson | 1.11 | | |
| 372 /2286 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

Support the principle of Policy GCrick.

Barnet council response

Support noted

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|----------|-------|--------------------------|------------|-----|----------|
| Object | James | Strategic Rail Authority | | | |
| 81 /2158 | Lough | | | | |

Comment

The strategic policy should refer to the rail facility.

Barnet council response

Agree

[Change document?](#)

Add after second sentence of policy GCrick "Regeneration will build upon the area's strategic location and key rail facilities."

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|-------|--------------------------|------------|-----|----------|
| Support | Keith | Railfuture London Branch | | | |
| 368 /2332 | Dyall | Railfuture | | | |

Comment

The car parking is not fully utilised at the moment, except at Christmas and a few Saturdays especially on the upper floors of the multi-storey car park. So a modest expansion of retail and office is possible bearing in mind the capacity of the road network.

Barnet council response

Support for a mixed use scheme is noted.

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------------|------------------------------------|-------------------|------------|-----------------|
| Object | Georgie | Thames Water Property Services Ltd | | | |
| 50 /2167 | Cook | | | | |

Comment

Concerned that the new Cricklewood Chapter does not include policies relating to utilities infrastructure. It is important that development is phased so that the additional infrastructure requirements can be met. This is an important consideration when drawing-up a masterplan, and it should be made clear to developers that they will be required to carry out the survey and improvements to the network. Developers must be made aware that there may be sewers that may need diversions or formal building over approval from Thames Water. Suggest further policy which covers these points.

Barnet council response

Agree however this can generally be dealt with in the r.j. to policy C1

Change document?

Add "utilities" to second sentence of para 1.12 after "transport"

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Sue | Barnet Friends of the Earth | | | |
| 286 /2060 | Bird | | | | |

Comment

We are not sure whether the term 'urban activities' covers urban living. For clarity, we suggest replacement of 'activities' by 'living' - or additional wording.

Barnet council response

"Activities" refers to action, therefore urban activities are those that take place in urban areas. There is no need to change the word.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | I | | | | |
| 350 /2017 | Mitchell | | | | |

Comment

According to the latest chapter of the UDP review, West Hendon will be incorporated with Cricklewood and Brent Cross in the proposed regeneration. We do not wish to be included in this scheme. We also want an independent voice as residents, we want the views of the retailers of West Hendon Broadway to be considered separately from residents' views. There does not appear to be anything of benefit to the existing residents of the estate included in the plans.

Barnet council response

The regeneration of West Hendon, including the redevelopment of housing and improvements to the town centre and traffic, is the subject of a separate regeneration scheme. However the West Hendon area will benefit from the new jobs, training, community and leisure facilities, and public transport included in the wider regeneration area. To clarify the situation,

Change document?

Change para 1.11 ;

"The regeneration of West Hendon is going ahead in advance of the rest of the area. However new jobs, training, community and leisure facilities created through the wider regeneration scheme will benefit West Hendon which is the reason for its inclusion in this chapter."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|--------------------------------------|-------------------|------------|-----------------|
| Object | David | West Hampstead Amenity and Transport | 1.11 | | |
| 363 /2171 | Levene | | | | |

Comment

We consider this major development might have adverse effects on existing centres to the south and the council should have regard to this and consider what might be done to lessen the effects.

Suggest adding at the end of GCrick:

'The council will take account of the likely impact of the proposed development on existing centres including West Hampstead and Finchley Rd and in consultation with L.B.Camden and local occupiers will promote improvement in existing centres to ensure their continued viability'.

Barnet council response

Disagree as this issue can be dealt with under policies C5 and C6.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Paul | | | | |
| 362 /2149 | Hoskins | | | | |

Comment

What are Barnet, Brent and Camden Councils proposing to do about the wider traffic problems in the area? With much of Cricklewood now gridlocked for most of the day, this must impact on businesses and on development plans. We want to see Cricklewood regenerated, but all we see so far is more housing, more traffic and plans for a rubbish dump in our garden.

Barnet council response

The council's plans are for comprehensive development that takes account of land use and transport. In addition, the relevant local authorities and TfL aim to tackle wider traffic problems in the area.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Julian | Montagu Evans | 1.11 | | |
| 360 /2095 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

The second sentence of the policy has been added to the policy since the publication of the revised UDP in March 2001. This should be deleted because it does not reflect the correct treatment of Brent Cross. Brent Cross is already a type of town centre as part of the hierarchy in Table 5.2 of RPG3.

Barnet council response

Brent Cross is defined as a regional shopping centre in RPG3. This is to be superceded by the London Plan the draft of which does not consider Brent Cross a town centre consistent with the definition in PPG6 . This is because it has a singular retail character rather than a mixture of uses more able to reduce the need for customers to use the car. The timetable for publishing the London Plan suggests that policy guidance in RPG3 will not apply when the UDP is adopted but the London Plan will. The opportunity is being taken to transform the centre into a more sustainable destination for shopping.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Howard | The Highways Agency | | | |
| 356 /2056 | Moore | | | | |

Comment

The Agency fully supports the statement within Policy GCrick that "...the council will seek ...environmentally viable sustainable development".

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Renato | Watford Council | 1.11 | | |

365 /2184 Messere

Comment

Objection to the fact that Brent Cross has been given the status of Major Town Centre. This is a change from its previous definition as a regional centre. The potential consequences of this mean that the expansion of the existing retail use will not be subject to as high a level of scrutiny, in terms of the justification of need and sequential location, as would have been the case for a regional centre.

Whilst it is acknowledged that the draft London Plan identifies the area as an Opportunity Area, the Plan requires the preparation of planning frameworks to set out a sustainable development programme for each area. It is not considered that this has been achieved and at the present time, there seems to be little research to justify that additional retail use is required to enable the regeneration plans to proceed. This should be addressed prior to the consideration of any outline planning permission, not as part of it, as seems to be suggested.

Policy GCrick or other part of the Plan should state that the regeneration opportunities will be subject to the preparation of a planning framework setting out a sustainable development programme for the area in conjunction with stakeholders and all those potentially affected by them. This should be informed by research to justify/demonstrate need for retail development at a town centre scale.

Barnet council response

Agree. A retail extension and mixed uses will turn Brent Cross into a major town centre. The amount of retail and other appropriate town centre uses will be justified in accordance with government guidance contained in PPG6, "Town Centres and Retail Developments" and subsequent ministerial statements.

Change document?

A new paragraph will be added after 1.11 to state;

"A planning framework will be produced that will justify the amount of retail floorspace that will be necessary to bring about the regeneration of the area. This will be the subject of further consultation." See change to the r.j. to policy C1.

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Gary | Mappin Planning & Development | | | |
| 172 /1988 | Mappin | Warner Village Cinemas | | | |

Comment

While Warner Village recognise that there may be a general objective to secure regeneration, there does not appear to be any clear justification why there is a planning need to create a new town centre in this location.

There is no strategic policy support for this proposal. The Mayor of London's SDS is not yet policy, and accordingly RPG3 still applies. Warner Village have objected to the London Plan in relation to the leisure/town centre proposals for Cricklewood.

Barnet council response

The council acknowledges that the UDP should conform with RPG3 but as the process of preparing the London Plan is underway, it is realistic to take it into account. It is anticipated that the London Plan will be published in March 2004, ahead of the adoption of the UDP.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | 1.11 | | |
| 372 /2287 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

While supporting the thrust of Policy GCrick, there should be a reference in the wording to securing "new homes" as well as new jobs and facilities, so that the full range of regeneration initiatives which are being pursued in the area are properly reflected.

Barnet council response

Agree

Change document?

Add "homes" after "new" in last sentence of policy GCrick2

| | Name | Organisation name/Client | Para start | end | Page no. |
|---------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Nick | English Nature | | | |

269 /1971 Radford

Comment

Policy GCrick sets the scene for the Council to seek "economically, socially and environmentally viable sustainable development". This clearly establishes an approach to sustainable development which reflects the Government's approach in "A better quality of life: a strategy for sustainable development in the UK" (1999) and as such this is to be supported. It is important therefore that this approach is maintained throughout the plan and in particular, this new chapter.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|---------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Donald | Camden (London Borough of) | | | |

367 /2193 Chambers

Comment

We would support the development of Brent Cross as a town centre incorporating the wider mix of uses that town centres embrace.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Howard | The Highways Agency | | | |

356 /2057 Moore

Comment

Although the Agency supports the statement within Policy GCrick that "the council will seek ..environmentally viable sustainable development ", we would suggest that what is meant by this concept should either be more accurately defined or, bearing in mind this is an additional chapter to the existing UDP, cross referred to an appropriate definition elsewhere in the plan.

Barnet council response

Agree

Change document?

Add second sentence to para 1.11 to state;

"See paragraph 2.4.1and policy GSD in the Revised Deposit UDP 2001."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Mason Richards Planning | | | |

354 /2044 Fenwick

Castlemore Securities Ltd

Comment

Should avoid use of jargon. What is 'economically, socially and environmentally viable sustainable development', what is 'an important, thriving place', what are the 'urban activities' to which it refers? Who is assessing whether development fulfils these requirements, how are they assessing it, and what is expected as a result of the assessment? Policy GCrick could be greatly simplified by the omission of the final sentence.

Barnet council response

The policy is deliberately setting out the strategic vision for the area.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|----------|----------------------------|------------|-----|----------|
| Support | Donald | Camden (London Borough of) | | | |
| 367 /2229 | Chambers | | | | |
| Comment | | | | | |
| We support the aspirations of trying to achieve an economically, socially and environmentally sustainable development and the acknowledgement that development of the area has to meet local and strategic needs. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|----------|----------------------------|------------|-----|----------|
| Object | Donald | Camden (London Borough of) | | | |
| 367 /2219 | Chambers | | | | |
| Comment | | | | | |
| The development of Brent Cross as a town centre will have a detrimental impact on the vitality and viability of town centres within Camden. It will also result in additional traffic pressure on local roads leading to loss of amenity to Camden residents in the Cricklewood area. Additional traffic will further exacerbate the problems of congestion along Cricklewood Broadway and Kilburn High Road creating a less pleasant shopping environment undermining attempts to regenerate the Kilburn area. Before any development of Brent Cross as a town centre is considered a Retail Impact Assessment needs to be carried out, and if found to harm to any of the existing town centres within Camden development would be contrary to PPG6. | | | | | |
| Barnet council response | | | | | |
| Assessments will be made during the preparation of the framework and masterplans. See policy C6. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|----------|----------------------------------|------------|-----|----------|
| Object | Nicki | Nathaniel Lichfield and Partners | | | |
| 370 /2244 | Mablesen | Capital Shopping Centres | | | |
| Comment | | | | | |
| Policy GCrick should make it clear that priority will be given to regeneration of existing town centres ahead of the development of a new town centre. The existing town centres in the area already provide for the local community and are well linked to the surrounding area by a range of means of transport. The planning framework being prepared should prioritise development in existing town centres to serve the current and future population. In addition, it is vital to ensure that in the assessment of any new proposals there is clear acknowledgement of the important role that existing town centres can play in serving the North London Sub-Region and the need to protect this role. The extent to which Brent Cross might contribute to regeneration in this area should reflect the important role that existing town centres in and outside London perform in serving the population and businesses of the North London area. The regeneration of existing town centres ahead of the identification of a new town centre is fully in accordance with national and emerging regional planning guidance which aims to protect and promote the vitality and viability of existing town centres in both urban and rural locations. | | | | | |
| Suggested rewording of GCrick: | | | | | |
| 'The Cricklewood, West Hendon and Brent Cross Regeneration Area, as defined on the proposals map, is designated as a major regeneration opportunity. The development of the regeneration area will promote the development and regeneration of existing town centres to provide for the needs of existing and future residents. The potential for the development of a new town centre will be considered over the plan period. If additional capacity for town centre uses is identified which cannot be met within existing defined town centres. Within the regeneration area the council will seek economically, socially and environmentally viable sustainable development which will enable the creation of an important, thriving place for urban activities and secure new jobs and facilities to meet local and strategic needs'. | | | | | |

The proposed wording will ensure that the policies of the new chapter are consistent with national, regional and adopted local plan policy to promote existing town centres as well as other proposed policies of the new chapter.

Barnet council response

The vitality and viability of existing town centres will be sustained in accordance with policy GTCR1. However Brent Cross serves a different purpose at present as a regional shopping centre and has the potential to develop as a major town centre in the future. The new town centre will bring economic, social and environmental benefits to the regeneration area.

[Change document?](#)

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|---------------------------|------------|-----|----------|
| Object | Keith | Mason Richards Planning | 1.11 | | |
| 354 /2043 | Fenwick | Castlemore Securities Ltd | | | |

Comment

Paragraph 1.11 helpfully identifies that 'regeneration will be centred on an expanded town centre that integrates development to the north and south of the North Circular Road.'

Inevitably a particular driver behind regeneration, will be continued retail development of the Brent Cross shopping centre, and other retail schemes within the UDP defined town centre.

"The bulk of the retail uses will be expected to be located immediately to the north and south of the A406 " (Regeneration Brief: Retail Strategy); No such clear and explicit guidance is forthcoming within the Additional Chapter of the UDP.

Town centres provide for a broad range of facilities and services, which act as focus both for the community and for public transport, such a view is recognised within PPG6. The Additional Chapter could helpfully clarify, in general strategic terms, the type, nature, scale and location of the uses it envisages coming forward within the newly defined town centre area, and specifically how they relate and integrate to the existing Brent Cross shopping centre, and to extant retail planning consents.

Barnet council response

This will a matter to be worked out at the development framework followed by a masterplanning stage and is too detailed a matter for the UDP.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|--------------------------|------------|-----|----------|
| Object | Ken | Greater London Authority | 1.11 | | |
| 188 /2110 | Livingstone | | | | |

Comment

The third sentence requires correction of interpretation of what the draft London Plan says.

Barnet council response

Agree

Change document?

Replace third sentence of para 1.11 with

"Regeneration will be centred on the creation of a new town centre to complement the roles of other centres nearby which will result in the integration of development to the north and south of the A406 North Circular Road. It will combine the expanse of former railway land, industrial land to the east of Cricklewood station together with Brent Cross shopping centre."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|-------------------------------|------------|-----|----------|
| Object | Mary | GVA Grimley | 1.11 | | |
| 180 /2222 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Paragraph refers assumes that Brent Cross is an existing town centre .

Barnet council response

Agree

Change document?

Change the third sentence to state;

"Regeneration will be centred on the creation of a new town centre to complement the roles of other centres nearby which will result in the integration of development to the north and south of the A406 North Circular Road."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Renato | Watford Council | | | |
| 365 /2183 | Messere | | 1.11 | | |
| Comment | | | | | |
| Support in principle for the regeneration of the Cricklewood, West Hendon and Brent Cross Regeneration Area. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

C1 - Comprehensive Redevelopment

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | | | |
| 180 /2223 | Power | Cricklewood Redevelopment Ltd | 1.12 | | |
| Comment | | | | | |
| Insufficient clarity is given to how comprehensive development can be achieved with sufficient flexibility. | | | | | |
| Barnet council response | | | | | |
| Agree and more detail will be added. | | | | | |
| Change document? | | | | | |
| Add after para 1.12 | | | | | |

"1.12a This comprehensive approach will require the formulation of a Development Framework that addresses urban design for the whole area and gives an indication of the uses considered appropriate on different parts of the site. It will be adopted as supplementary planning guidance and be the subject of thorough consultation with landowners, developers and local communities. This will give flexibility and allow for changes in the economic, social and planning environment over 10-15 years of development to be reflected in the proposals. A Delivery Strategy will be formulated within the Framework to enable contributions to be made towards the infrastructural costs for the whole of the regeneration of the Area, and from individual sites within it so as to ensure the schemes and the comprehensive approach remains viable. Masterplan applications for parts of the Area will be supported if they conform with the Development Framework and its Delivery Strategy.

Policy C1

The council will seek the comprehensive development of the Cricklewood, West Hendon and Brent Cross Regeneration Area in accordance with a Development Framework and Delivery Strategy to be approved by the council. Planning applications as masterplans will be supported if they are consistent with these documents."

C1 - Comprehensive Redevelopment

| Name | Organisation name/Client | Para start | end | Page no. |
|------|--------------------------|------------|-----|----------|
|------|--------------------------|------------|-----|----------|

287 /2342 Regeneration

Comment

There is a need to explain the ideas of frameworks, delivery strategies and masterplans as additions to the glossary.

Barnet council response

Change document?

Add to glossary the following entries;

SPATIAL STRATEGY: The general strategy for an area with broad concepts and land uses in two dimensions, which the Cricklewood, West Hendon and Brent Cross chapter seeks to achieve.

DEVELOPMENT FRAMEWORK: A strategy setting out the basic structuring of mixed uses that may be in three dimensions, including; land parcels, phasing of development, linkages, component uses, open space, urban design, delivery mechanisms (section 106 agreements and planning conditions), parking and the methods of consultation and neighbourhood management. The detail of these will be devolved to Masterplans.

MASTERPLAN: A detailing of the Development Framework as a planning application implementing urban design to the highest standard, including coverage of building lines, scale and height, materials and the public realm (for pedestrians to include street furniture and activities).

C1 - Comprehensive Redevelopment

| Name | Organisation name/Client | Para start | end | Page no. |
|------|--------------------------|------------|-----|----------|
|------|--------------------------|------------|-----|----------|

Support Ken
188 /2113 Livingstone

Comment

Transport for London (TfL) supports the principle of pooling Section 106 financial contributions.

Barnet council response

Support for a mixed use scheme is noted.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Mason Richards Planning | 1.12 | 1.23 | |
| 354 /2045 | Fenwick | Castlemore Securities Ltd | | | |

Comment

Fundamental objection is raised to the wording of policy C1, and the supporting statements at paragraphs 1.12 and 1.23. The objectives sought by this policy are not objected to; it is merely that the means identified will not come to fruition.

The Council seeks to avoid a 'piecemeal approach to redevelopment'. The policy that then follows, however, will fail to delivery the desired objectives.

It is simply implausible that any private sector interest would be prepared to pursue one outline proposal with some detail for such an extensive area, where any individual land interest is likely to be limited to only a small part of the overall scheme. It is submitted, that policy C1, as worded, is wholly unworkable and unachievable. If the red line area for this outline 'proposal' is the whole regeneration area, any Section 106 Agreement, for any element within it would need to include the signature of all the landowners within the red line area.

It is suggested that the Additional Chapter establishes a comprehensive masterplan approach, which identifies the aims and objectives in land use policy terms for the different areas within it. It could also include a list of desired infrastructure improvements to enable the masterplan approach to be achieved.

The authority could then seek to negotiate Section 106 contributions fairly and reasonably related to individual development proposals as they come forward, on a site-by-site basis, but within the context of an approved overall masterplan approach.

Policy C1 could, therefore, be worded in the following terms:

"The Council will seek the comprehensive development of the Cricklewood, West Hendon and Brent Cross Regeneration Area. The Council will produce in partnership with interested parties, a masterplan approach for development within the area, which will be adopted as supplementary planning guidance."

Barnet council response

Agree

Change document?

See change under 180/2223

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Ken | Greater London Authority | 1.12 | | |
| 188 /2111 | Livingstone | | | | |

Comment

The stated intention throughout the chapter to make the most of resources and Policy C1 is welcomed.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|------------------------------------|-------------------|------------|-----------------|
| Object | Mark | RPS Group Plc. | 1.12 | | |
| 355 /2055 | Krassowski | Dixons Group Retail Properties Ltd | | | |

Comment

Objection is made to the general approach of the draft chapter, and specifically Policy C1 in that it seeks to secure a comprehensive development of the Cricklewood, West Hendon and Brent Cross area via a single outline planning application. This approach is flawed as there is no certainty that a developer will submit a single application covering the entire area, or that only one outline application is made. Moreover, the approach assumes that the outline application will be forthcoming and will be acceptable to all landowners, who will need to be party to any Section 106 agreements arising. The policy approach has enormous potential to stifle or significantly delay the regeneration of the area, rather than promote it.

The whole approach to the draft chapter needs to be revised. The council should act as the instigator for regeneration of the area themselves, by guiding the development principles through production of a masterplan. The policies should be redrafted based on the masterplan, and should set out the clear requirements for each element or land use proposed by the masterplan. The policies should include mechanisms for securing the necessary infrastructure, through appropriate Section 106 Agreements.

The revised policy approach including Policy C1, should enable individual applications to come forward and be judged against the masterplan, provided they contribute towards the overall objectives of the area.

Barnet council response

Agree, however it is considered that the next stage is to prepare a Development Framework so as to guide more detailed matters of floorspace ranges in areas of the scheme through Masterplans.

Change document?

See change under 180/2223

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Sue | Barnet Friends of the Earth | | | |
| 286 /2062 | Bird | | | | |

Comment

If we understand the term 'sequence of development' correctly as being the priority order, then the sequence of development should be clearly defined to avoid accusations of these proposals just being a smoke screen for the expansion of Brent Cross Shopping Centre.

Suggest following amendment ' . . . The council will seek the comprehensive development of the Cricklewood, West Hendon and Brent Cross Regeneration area in accord with the sequence of development'.

Barnet council response

The order of the places listed in the title of the chapter does not have any significance for the order of development.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | | | |
| 188 /2114 | Livingstone | | | | |

Comment

Change second sentence of policy to require more comprehensive information within the submission of an outline application.

After "that includes" insert "a masterplan and/or urban design framework".

Barnet council response

Agree and this will be added in a changed policy

Change document?

See ref 180/2223

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Julian | Montagu Evans | 1.13 | 1.23 | |
| 360 /2311 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

Policy C1 and paragraphs refer to the provision of an outline planning application to deal with the whole area. This is impractical, inconsistent with the Revised UDP 2001 that wishes for a framework for the area, derogates from the intention of policy TCR1 to extend Brent Cross in a comprehensive way, and would militate against the 10-15 year timescale proposed when any outline proposal would expire. It would be impossible also because of the number of parties involved needed to agree all the signatures for a section 106 agreement.

Barnet council response

agreed

Change document?

See change 180/2223

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------------|------------------------------------|-------------------|------------|-----------------|
| Object | Georgie | Thames Water Property Services Ltd | | | |
| 50 /2168 | Cook | | | | |

Comment

We recommend that planning conditions be attached to any planning consents that require details of on and off-site drainage works to be submitted to and approved by the LPA. In addition, we recommend that the Section 106 Agreements required as part of the development include the following clause:

'Not to commence the development or any part thereof unless and until:

- a) details of on and off-site foul and surface water drainage have been approved in writing by the LPA; and
- b) arrangements have been made to the satisfaction of the LPA for the provision of adequate foul and surface water drainage for the whole of the development. Such drainage should comprise:-
- i) the provision and / or ii) the enlargement of such drainage as may be necessary as determined by the LPA in consultation with the Sewage Undertakers and should be secured where appropriate by payment by the owners or their successors in title of a requisition (according to Section 99 of the Water Industry Act 1991) - a contribution towards the cost thereof incurred by the Sewerage Undertaker'.

The reason for these details is to accord with Section 106, para 4 of the Water Industry Act 1991.

Barnet council response

This matter will be a detailed matter for future planning applications.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Donald | Camden (London Borough of) | | | |
| 367 /2195 | Chambers | | | | |

Comment

Welcome the development of the area to meet both local and London's strategic needs. We support the partnership approach advocated by the policy.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Duncan | RPS | | | |
| 133 /2058 | Mason | B & Q Plc | | | |

Comment

Policy C1 should refer to existing uses (such as the B & Q Warehouse), their operations and that they can contribute to the regeneration of the area.

Barnet council response

This interaction between existing uses will be a detailed matter to develop over time however reference will be made to

land uses in the reasoned justification as well as policy.

Change document?

Add to last sentence of para 1.12 "existing land uses and" after "communities"

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Howard | The Highways Agency | | | |

356 /2059 Moore

Comment

The Highways Agency is unable to enter into section 106 agreements with developers. DTLR Circular 04/2001 sets out the procedures that would need to be followed in respect of developer funded improvements to the trunk road network. Such improvements are linked to the development by means of conditions attached to the planning permission so it is essential that this is reflected in the new Chapter. It is difficult to suggest an appropriate form of wording for policy C1.

Barnet council response

The wording has changed to not be so specific. See policy C11 which refers to conditions and change under 180/2223.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Anita | Drivers Jonas | | | |
| 369 /2232 | Young | Department of Health and Social Care - London | | | |

Comment

The DoHSC welcomes the reference to the use of planning agreements to secure necessary community facilities to meet the needs generated by development/regeneration in policy C1 and paragraph 1.12.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | | | |

188 /2112 Livingstone

Comment

Clearer targets for the provision of accessible space and appropriate densities for the area as a whole, and sub sites within it, may be of benefit to the comprehensive development approach. Broad minimum density figures are included in the draft London Plan and the GLA would be happy to work with Barnet to develop appropriate minima for the area.

Barnet council response

This will be considered at the development framework and then masterplanning stages.

Change document?

C1 and C2

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|----------|------------------------------|------------|-----|----------|
| Object | Mide | Government Office for London | | | |
| 187 /2021 | Beaumont | | | | |
| Comment | | | | | |
| Policies C1 & C2 | | | | | |

These policies refer to the Council's expectation that an "outline planning proposal" will be produced that will include comprehensive section 106 agreements and an urban design framework. It is unclear what is meant by an outline planning proposal. Would this be in the form of an outline masterplan application to be followed by detailed applications for the various components of the redevelopment? Alternatively, by reference to an outline planning proposal do the Council mean a planning brief to guide both the overall development of the regeneration area and the form and content of future planning applications? If the latter is intended, it is difficult to see how it would be possible to conclude comprehensive section 106 agreements in advance of any planning application(s).

For clarity and the avoidance of doubt, the planning process envisaged by the Council for the regeneration of the areas should be made explicitly clear in the chapter. (See also our objection to policy C7).

Barnet council response

Agree

[Change document?](#)

See change 180/2223

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-----------|------------------------------|------------|------|----------|
| Object | Barry | Robert Turley Associates | 1.15 | 1.16 | |
| 168 /2202 | Cansfield | Sainsbury's Supermarkets Ltd | | | |

Comment

We note that Brent Cross town centre is defined on the amended Proposals Map. In view of the fact that a town centre designation provides 'in principle' support for further retail development (in accordance with PPG6), it is considered that the designation should only include land to the north of the North Circular - ie Brent Cross Shopping Centre. The North Circular provides a significant physical barrier and to that extent, land to the south should be excluded from the town centre designation.

Barnet council response

Disagree. There will guidance on the level of retail development in a Framework document and the town centre will have a mixture of uses and not just retail floorspace. Connections will be made between both sides of the North Circular.

[Change document?](#)

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|---|------------|-----|----------|
| Object | Martin | Scott Wilson | 1.12 | | |
| 372 /2289 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

While MHT/ Lovell Construction supports the Council's approach in requiring a comprehensive method of securing an agreed masterplan and framework for the development of the overall Opportunity Area, there needs to be sufficient flexibility in such an approach, given the scale and complexities of the area involved.

Barnet council response

Noted and this is referred to in the amended new paragraph 1.12a (See 180/2223 and 372/2290)

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|---------|---|------------|-----|----------|
| Support | Martin | Scott Wilson | 1.12 | | |
| 372 /2288 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |
| Comment | | | | | |
| MHT/ Lovell Construction supports the Council's approach in requiring a comprehensive method of securing an agreed masterplan and framework for the development of the overall Opportunity Area. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|---------|---|------------|-----|----------|
| Object | Martin | Scott Wilson | 1.12 | | |
| 372 /2290 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |
| Comment | | | | | |
| While West Hendon is included within the Regeneration Area, it has particular housing and infrastructural issues which will be more appropriately handled through reference to its own development and phasing timetable. It may be that this should be the subject of a separate outline planning application and Section 106 Agreement. Alternatively, the Cricklewood/Brent Cross masterplan could refer to a further framework and phasing agreement to specifically cover the requirements of West Hendon. | | | | | |
| Barnet council response | | | | | |
| Agree | | | | | |
| Change document? | | | | | |
| Add to end of new paragraph 1.12a as changed "Housing-led regeneration in West Hendon town centre may progress separately to a Cricklewood/Brent Cross masterplan. Contributions may still be required towards the physical and economic support of West Hendon." | | | | | |

C2 - Urban Design

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------|-------------------------------|------------|-----|----------|
| Object | Mary | GVA Grimley | 1.13 | | |
| 180 /2224 | Power | Cricklewood Redevelopment Ltd | | | |
| Comment | | | | | |
| Disagree that the urban design framework should be part of a s106 agreement when it can be dealt with as a condition. | | | | | |
| Barnet council response | | | | | |
| Agree and the framework will use this | | | | | |
| Change document? | | | | | |
| Restate last sentence of policy C2 as; | | | | | |
| "Urban design guidelines will be required as part of the Development Framework, to be implemented through subsequent Masterplan permissions for sites within the Area. | | | | | |

C2 - Urban Design

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------------------------------|----------|----------------------------|------------|-----|----------|
| Support | Donald | Camden (London Borough of) | | | |
| 367 /2196 | Chambers | | | | |
| Comment | | | | | |
| Supporting the policy. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Julian | Montagu Evans | 1.13 | | |
| 360 /2312 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

The fourth from last sentence needs to be changed to "Urban design guidelines will be included in the preparation of the planning policy framework for the regeneration area." This is because all reference to "the proposals" meaning outline applications are not appropriate as stated for policy C1

Barnet council response

Agree

Change document?

See change 180/2224

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Walter | Barnet Primary Care Trust | | | |
| 371 /2259 | Thompson | | | | |

Comment

Traffic accidents are a major cause of preventable deaths, particularly in younger age groups. Also many environmental factors are important cause of accidents and many measures to prevent accidents require changes and improvements in the physical environment. The council should take measures to reduce traffic accidents.

The potential for reducing accidents in and around the home, and in the workplace, needs to be taken into account at the detailed planning and design stage.

Barnet council response

Issues of safety are referred to in paragraph 1.13 in the 7th sentence and policy C2, however internal design is not an issue for the planning system to regulate on this issue.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------------|-------------------|------------|-----------------|
| Object | Jean | Woolmead Avenue Residents Association | | | |
| 285 /1980 | Ivatt | | | | |

Comment

Very dense buildings, with a proposal to squeeze in 4000 housing units plus office, retail outlets and hotels. A concrete jungle will be the result, slums of tomorrow, and again the UDP is not being adhered to.

Barnet council response

The Framework and Masterplans will guide develop considering issues of design, density, land use, open space, etc, to ensure development is undertaken sustainably.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Carol | The Finchley Society | | | |
| 263 /2157 | Halls | | | | |

Comment

The policy should also require high quality architectural design. The use of 'urban' suggests that only the streetscape etc needs to be of a high standard.

Suggest amending the policy to read: ' . . . achieve a high standard of urban and architectural design. . . . '

Barnet council response

The concept of urban design encompasses both streetscape and architectural issues as well as the spaces between buildings including open space.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------------|-------------------|------------|-----------------|
| Object | Jean | Woolmead Avenue Residents Association | | | |
| 285 /1979 | Ivatt | | | | |
| Comment | | | | | |

The proposal is for 2,004 dwellings to be built on the site of the existing West Hendon council estate, including nine tower blocks, one block proposed to be 24 storeys. How does this fit-in with the council's urban design policy?

How does this fit-in with the country-wide policy of pulling down tower blocks? Close living is not meant to be as close as these numbers would have be.

Barnet council response

The proposal for the West Hendon Council Estate for its redevelopment will be the subject of a separate masterplan to Cricklewood/Brent Cross and will be judged against this policy.

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------------|---------------------------------|-------------------|------------|-----------------|
| Object | John Miller | | | | |
| 374 /2328 | Lesley Turner | | | | |
| Comment | | | | | |

There should be minimum guidance to developers on open space provision and balcony areas if no density levels are given.

Barnet council response

Policies on open space and other design issues are contained in the Built environment and Housing Chapters of the Revised Deposit UDP

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Mason Richards Planning | | | |
| 354 /2048 | Fenwick | Castlemore Securities Ltd | | | |
| Comment | | | | | |

It appears that the objective of this part of the policy is to delegate the function of the Council as planning authority in preparing a design brief for the area, to an unnamed applicant. Policy C1, refers to 'the' outline-planning proposal, indicating some certainty that the outline-planning proposal will have been made. In the absence of any outline application being made for the whole of the regeneration area, it is evident that the objectives of much of the Additional Chapter simple cannot be achieved. For the sake of clarity, if the Additional Chapter is referring to an application it should use the word application, rather than 'proposal', which has no particular status or meaning in the planning lexicon.

Barnet council response

Agree

[Change document?](#)

See change under 180/2224

C2 - Urban Design & C3 - Urban Design

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Railfuture London Branch | | | |
| 368 /2276 | Dyall | Railfuture | | | |
| Comment | | | | | |

The fear is that there will be high rise developments on the site purely to get all of the proposed development. This would not be in keeping with the local area and tower over surrounding estates. We would expect a very high standard of architecture compatible with the surrounding area.

Barnet council response

This will be a consideration in applying these policies and those in the rest of the UDP in the Built Environment and Housing Chapters.

[Change document?](#)

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|--------|--------------------------|------------|-----|----------|
| Object | Twiggy | Metropolitan Police | 1.13 | | 5 |
| 349 /2013 | Shrub | | | | |

Comment

Change to give crime prevention design issues prominence.

Barnet council response

Agree

Change document?

Amend para 1.13 to read in 7th sentence;

"... development is designed to a high standard with particular regard to its architecture (including enhanced security through Secured by Design (SBD), and Secure Car Parks Scheme (SCPS); to include Crime Prevention Through Environmental Design (CPTED), safety and accessibility. This will help improve the . . ."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------------|--------------------------|------------|-----|----------|
| Object | John Miller | | 1.13 | | |
| 374 /2323 | Lesley Turner | | | | |

Comment

There is an imbalance in open space provision in the area with a deficiency on the west side of the railway tracks, with no space except the Kara Way playground and on Cricklewood Lane in front of B & Q. If the latter is used for a drop off point for cars then it should be made up for on the west side of the tracks.

Barnet council response

Open space provision will be dealt with in the Development Framework and Masterplans.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|--------------------------|------------|-----|----------|
| Object | Ken | Greater London Authority | 1.13 | | |
| 188 /2121 | Livingstone | | | | |

Comment

The third, seventh and twelfth sentences should be amended to emphasise qualitative importance/aspiration of redevelopment criteria.

Barnet council response

agree

Change document?

Replace "high" with "highest" in 3rd sentence; "a high standard" with "the highest standards" in seventh sentence and "should add to" with "is expected to improve" in 12th sentence of para 1.13.

C3 - Urban Design

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|------------------|-----------------------------------|------------|-----|----------|
| Object | Eli | Railway Terraces Residents Assoc. | | | |
| | 361 /2106 | Jones | | | |

Comment

This policy makes reference to permitted development rights, but does not specify whose? If it refers to the railway owners, we believe the council should strongly resist any development outside the application under permitted development rights. As such the last seven words should be removed from the clause.

If the PD rights apply to the conservation area, the clause should be redrafted to make clear.

Barnet council response

The reference is to the fact that the council has not placed an Article 4 Direction on the Railway Terraces, Cricklewood Conservation Area. Article 4s are placed where the council is of the view that the special character and appearance of a conservation area is at least in part, to be found in the size, and architectural detailing of the houses in it and that this should be protected from harmful change. Without an Article 4 Direction, this means that, at present, owners of houses within the Railway Terraces, Cricklewood Conservation Area have 'permitted development rights' and can, for example, remove and replace doors and windows, build extensions up to a specified size and carry out other similar 'minor works' without first getting Planning Permission and approval from the council's conservation officers. The referred to wording in the policy will ,therefore, be removed.

Change document?

Change policy in second sentence;

"The character and appearance of the Cricklewood Railway Terraces will be preserved or enhanced." deleting the reference to PD rights at the end.

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|------------------|--------------------------|------------|-----|----------|
| Object | Mary | GVA Grimley | | | |
| | 180 /2225 | Power | | | |

Comment

The planning process cannot deal with "quality of life" as this is not determined always by issues with land and development.

Policy C3 state that wrong test for conservation areas as stated in PPG15

Barnet council response

agree

Change document?

Change policy C3 ;

Planning permission will not be granted for development within the regeneration area unless it protects and improves the amenities (delete "quality of life") of existing and new residents. The character and appearance of the Cricklewood Railway Terrace Conservation Area shall be (delete "protected and preserved (and where possible, enhanced)") [preserved] or enhanced by any development."

C3 - Urban Design

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|--------|--------------------------|------------|-----|----------|
| Object | Tobias | | | | |
| 353 /2037 | Hill | | | | |

Comment

Having known the Cricklewood area for about thirty years, I believe the Railway Terraces to be one of the best things. They are unusual in their scale and unity, with a thriving mixed community of several hundred people, including a great number of children. The Railway Terraces should be cherished and treated with care. Whatever regeneration takes place, it must not be to the detriment of the old Cricklewood.

A new waste transfer station should only be built if it is positioned at a distance from housing as great or greater than currently exists, and if land can be landscaped to minimise pollution, and if industrial vehicle pollution is not increased in residential areas. If these improvements are not possible, the repositioning of the waste transfer station must be seen as something other than an improvement and reconsidered.

Barnet council response

There is no planning application at this stage to be determined and any impacts on residents in the Railway Terraces will be an important consideration when details are submitted as part of a masterplan. This will be after a Development Framework is agreed with the council which will involve further consultation.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|--------|--------------------------|------------|-----|----------|
| Object | Tobias | | | | |
| 353 /2030 | Hill | | | | |

Comment

The present waste transfer station is located at least 400m from housing. The proposed plans will substantially decrease this 'buffer zone', bringing the station critically closer to the Railway Terraces Conservation Area and to the social heart of old Cricklewood. I would suggest that the distance between the stations and any housing is maintained, or ideally, increased with landscaping to minimise the effects of pollution.

Barnet council response

The UDP chapter sets the basis for the planning framework for future planning applications. There is no planning application at this stage to be determined albeit an application was recently withdrawn for a proposal in this area. The objectors' concerns will be an important consideration when details are submitted as part of a masterplan. This will be after a Development Framework is agreed with the council which will involve further consultation.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|---------|--------------------------|------------|-----|----------|
| Object | Marlene | | | | |
| 351 /2020 | Wardle | | | | |

Comment

The UDP states that "The character and appearance of the Railway Terraces will be protected and preserved.. .. within the constraints of the permitted development rights." This clause in bold print should be removed as it allows organisations to construct such plants as waste or freight transfer.

Barnet council response

Agree

Change document?

See change 361/2106 for removal of this reference.

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
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|--------|--------|--|--|--|--|
| Object | Tobias | | | | |
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|------------------|------|--|--|--|--|
| 353 /2033 | Hill | | | | |
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Comment

Having spent several hours at the waste transfer station, I would like to comment on the pollution created by the facility itself. Both the internal and external operations create noise pollution. The noise of the large cranes used carries a considerable distance. If a new waste or freight transfer station were to be built, the new cranes might be quieter at first, but would eventually become as noisy as the old ones. Currently, this noise is not audible from the Railway Terraces Conservation Area, but would become so if the waste transfer station was moved closer.

Barnet council response

These matters will be an important consideration when details are submitted as part of a masterplan. This will be after a Development Framework is agreed with the council which will involve further consultation.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
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|--------|---------|--|--|--|--|
| Object | Jessica | | | | |
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| 352 /2019 | Howey | | | | |
|------------------|-------|--|--|--|--|

Comment

I understand that under policy C3 the phrase "within the constraints of permitted development rights" refers to the rights of the residents of the terraces as opposed to developers. Would like this to be confirmed and clarified in the Chapter.

Barnet council response

This reference to PD rights will be removed.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
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|--------|-------|--|--|--|--|
| Object | David | | | | |
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|------------------|------|--|--|--|--|
| 341 /1966 | Lang | | | | |
|------------------|------|--|--|--|--|

Comment

Cricklewood has a long and interesting history, particularly in the areas of Rail Transport and Aviation, which include the sites of Handley Page's factories and Cricklewood Aerodrome. However, there do not appear to be any plans to establish a Cricklewood Museum to preserve and research Cricklewood's history and make it available to local school, residents and others.

The plans should include a Cricklewood Museum with the regeneration area and arrangements should be made to fund the running costs.

Barnet council response

The chapter sets out the basis for the Development Framework. A museum could be included but this is too detailed a proposal at this stage.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
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|--------|-------|--|--|--|--|
| Object | David | | | | |
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| 363 /2174 | Levene | | | | |
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Comment

No reference is made to the impact of the development on existing centres in Barnet and in Camden at West Hampstead and Finchley Road.

Suggest amendment to Policy C3, add at the end: 'the council will ensure that the proposed development does not impact adversely on existing centres in Barnet / Camden, in particular, West Hampstead and Finchley Road to the south.

Barnet council response

See change to policy C5. This is an issue of retail assessment addressed in changes to policy C6.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
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|--------|-------|--|--|--|--|
| Object | M.A.G | | | | |
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| 348 /2009 | Brown | | | | |
|------------------|-------|--|--|--|--|

Comment

Construction of the waste transfer station so close to the Railway Terrace Conservation Area will blight and depress the whole neighbourhood - particularly my house and my neighbours' houses.

The tall building will shade morning light from my house; there will be a smell from the waste; it will attract rats and other vermin; there will be noise all hours of the day and night, particularly from vehicles and there will be traffic congestion on the A5. In Policy C3, I suggest deleting the words ' within the constraints of permitted development rights' and inserting words which show that even within 'Permitted Development Rights' human rights have to be respected and not violated.

Barnet council response

There is no planning application at this stage to be determined and these matters will be an important consideration when details are submitted as part of a masterplan. This will be after a Development Framework is agreed with the council which will involve further consultation.

Change document?

The reference to PD rights is to be deleted. There is no planning application at this stage to be determined and only impacts on residents in the Railway Terraces will be an important consideration when details are submitted as part of a masterplan. This will be after a Development Framework is agreed with the council which will involve further consultation.

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
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|--------|-----|--|--|--|--|
| Object | Eli | | | | |
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|------------------|-------|--|--|--|--|
| 361 /2102 | Jones | | | | |
|------------------|-------|--|--|--|--|

Comment

This again refers to partnership with local communities. We are keen to be involved in such a partnership, but have to date had meaningful dialogue over a period of time with only one developer. If this and the related clauses are to be fulfilled, Barnet must start to communicate properly with this community on its requirements and aspirations.

Partnership suggests an equal dialogue over a sustained period with representatives of the community that actually informs and influences the application of the UDP.

Barnet council response

Further consultation will be an essential part of future policy development for the area.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
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|---------|--------|--|--|--|--|
| Support | Martin | | | | |
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|------------------|---------|--|--|--|--|
| 372 /2291 | Herbert | | | | |
|------------------|---------|--|--|--|--|

Comment

MHT/ Lovell agrees with the Council's assessment of the importance in ensuring that a high quality design of architecture, safety and accessibility for the regeneration is achieved.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | | | |
| 372 /2292 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

While MHT/ Lovell agrees with the Council's assessment of the importance in ensuring that a high quality design of architecture, safety and accessibility for the regeneration is achieved, this should not be so prescriptive as to stifle innovation or initiative and should remain sufficiently flexible to accommodate bold ideas and cutting-edge design philosophy. With this in mind, we do not consider it is appropriate to include an urban framework in the list of matters to be addressed by the Section 106 Agreement, as to attempt to translate such material into legal terminology would inevitably introduce inflexibility and unnecessary constraints. Policy C3 should be amended accordingly.

Barnet council response

Disagree. Guidelines are required for urban design reasons with sufficient flexibility to encourage innovation.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Tobias | | | | |
| 353 /2046 | Hill | | | | |

Comment

I would urge the council to remove the clause ' within the constraints of permitted development rights', as this is unacceptable in modern inner-city planning. The council should put pressure on developers not to use their development rights.

Barnet council response

Agree

Change document?

See change 361/2106

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Donald | Camden (London Borough of) | | | |
| 367 /2197 | Chambers | | | | |

Comment

Support the policy.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Paul | | | | |
| 362 /2139 | Hoskins | | | | |

Comment

We object to the proposed siting of the waste transfer station for the following reasons: The smell and noise; there are no guarantees more serious pollution will occur. The already busy A5 will become logjammed with refuse vehicles between the Broadway and Staples Corner. The proposed site is inappropriate, being so close to residential areas. If it must relocate, then why not the more industrial environment to the north? A vehicle tunnel could be constructed under the railway. We are not simply trying to halt development as such, but do not know of any other waste transfer station in close proximity to housing, regardless of its conservation area status.

Barnet council response

The UDP chapter sets the basis for the planning framework for future planning applications. There is no planning application at this stage to be determined and these matters will be an important consideration when details are submitted as part of a masterplan. This will be after a Development Framework is agreed with the council which will involve further consultation.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|------|--------------------------|------------|-----|----------|
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|------------------|---------------|--|--|--|--|
| Object | John Miller | | | | |
| 374 /2324 | Lesley Turner | | | | |

Comment

Permitted development rights are raised when they are superfluous. More emphasis needs to be made on BREEAM energy efficiency standards, using natural ventilation and eco-friendly materials. Security by design ought to be a consideration.

Barnet council response

The reference to PD rights will be removed. These guidelines of BREEAM are referred to in the reasoned justification to policies Env1 and 2 and are not required to be repeated in this chapter.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|------|--------------------------|------------|-----|----------|
|--|------|--------------------------|------------|-----|----------|

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|------------------|---------|--------------------|--|--|--|
| Object | Robert | | | | |
| 364 /2178 | Goundry | Freightliner Group | | | |

Comment

There are potential conflicts between the policy of conserving Cricklewood Railway Terrace (policy C3) and making the most effective use of the railway land and lines in the area. The Council must set out clearly whether it believes this conservation requirement to be absolute, or whether there are other wider benefits to be achieved by setting out derogation criteria so that the most effective use can be made of rail routes in the area.

Barnet council response

It is necessary to preserve or enhance the conservation area and its setting in accordance with the PPG.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|------|--------------------------|------------|-----|----------|
|--|------|--------------------------|------------|-----|----------|

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|------------------|------------|---|--|--|--|
| Object | Julian | Montagu Evans | | | |
| 360 /2313 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

C3 has a first sentence which is already covered by existing UDP policies and should be deleted. The rest on the conservation can remain, except for "within the constraints of permitted development rights."

Barnet council response

A policy is required to balance particular amenity issues locally against the need for regeneration. The second part will be retained except for the reference to PD rights as the particular circumstances of the area need to be planned for.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|------|--------------------------|------------|-----|----------|
|--|------|--------------------------|------------|-----|----------|

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|------------------|---------|---|--|--|--|
| Object | Martin | Scott Wilson | | | |
| 372 /2293 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

Policy C3 includes a requirement to improve the quality of life for residents. While we are confident that will occur as a result of the regeneration proposals, this is not possible to measure and may well be dependent on factors entirely unrelated to matters appropriate to a Unitary Development Plan.

Barnet council response

Agree

Change document?

See change 180/2225

C4 - Sustainable Development

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|----------|----------------------------|------------|-----|----------|
| Support | Donald | Camden (London Borough of) | | | |
| 367 /2198 | Chambers | | | | |

Comment

We support the principle behind this policy.

Support part B as integral to the development of a liveable urban locality

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|----------|----------------------------|------------|-----|----------|
| Object | Donald | Camden (London Borough of) | | | |
| 367 /2199 | Chambers | | | | |

Comment

Both the policy and the supporting text are vague and fail to acknowledge the opportunities for a development project of this scale to incorporate, inter alia, renewable energy and water recycling proposals. The supporting text is not reflected in the policy, for the policy fails to mention energy efficiency and does not elaborate on what an appropriate mix of uses may be. The policy falls short of the objectives set out in policy GCrick.

A new policy should be included relating to mixed use and which gives a clear indication as to what an appropriate mix of uses should be.

Policy C4 needs to be strengthened to make it clear that buildings must include sustainable designs, the policy should also specifically state that energy efficiency measures must be designed into buildings and that a BREEAM assessment will have to be submitted.

Barnet council response

These issues can be dealt with in more detail at later stages in the Framework and masterplans.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|--------------------------|------------|-----|----------|
| Object | Keith | Railfuture London Branch | 1.14 | | |
| 368 /2280 | Dyall | Railfuture | | | |

Comment

It is difficult to see how nature conservation is to be taken into account certainly with wildlife because they cannot satisfactorily coexist with major development and the close proximity of many humans. At present, they can and do exist with railway activity. Many of the stated aims seem incompatible with the development.

Barnet council response

The main areas of nature conservation referred to are the SSSI and the River Brent's potential in the future rather than any species on the railway land - any protected species found here will be protected under the Wildlife and Countryside Act 1981 and will need to be taken into account in any development proposal.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|--------------------------|------------|-----|----------|
| Object | Matthew | Environment Agency | | | |
| 219 /1961 | Ellis | | | | |

Comment

The Environment Agency would like to see the policy strengthened in terms of restoring river Brent and provision for improving the nature conservation of the area.

Barnet council response

Agree.

Change document?

Add criteria "C) Ensures the restoration and enhancement of the River Brent and its river corridor to provide both amenity and nature conservation to the area."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Nick | English Nature | | | |

269 /1972 Radford

Comment

The Council's duty under Section 28G of Schedule 9 of the Countryside and Rights of Way Act (2000) to take reasonable steps to not only maintain, but also enhance the nature conservation interest of SSSIs is an important element of seeking to secure sustainable development. Policy O14 of the Revised Deposit UDP (2001) clearly sets out to achieve this. It is not reflected, however, in the proposed new chapter. Indeed, the proposed chapter barely acknowledges the existence of the SSSI. The only specific mention appears in the last sentence of policy C4 and whilst this sentence is supported, English Nature object to the overall lack of consideration given to the Brent Reservoir SSSI within the proposed new chapter. We also support the reference in paragraph 1.14 to the need to protect areas of nature conservation interest and seeking opportunities for enhancement or habitat creation. However, since this does not specifically refer to the SSSI it is not considered adequate.

In the allocation of land for development, development plans should provide a degree of certainty that the allocated land has a reasonable chance of being granted planning permission. It is therefore of utmost importance that the issues relating to the SSSI are recognised and addressed at this stage of the process. To leave this to the application stage could undermine the allocation.

English Nature suggest that:

- A separate policy should be incorporated into this new chapter specifically addressing the relationship of any proposed development to the SSSI. If this is not considered to be appropriate, policy C4 should be expanded to give further consideration to the issue;
- An additional paragraph is inserted into the new chapter, prior to policy C4 which draws attention to the nature conservation interest of the adjoining site and the importance of the buffer zone, and highlights the need to take this into consideration in any development proposals; and
- Cross-reference is made in the text to policy O14. This would also help to satisfy the duty outlined above in Section 28G of the Countryside and Rights of Way Act (2000).

Barnet council response

Agree that further advice is needed in the r.j. however the issue is referred to in the policy already.

Change document?

Add a new paragraph after the 7th sentence of para 1.14; "The Brent Reservoir is a SSSI and is located adjacent to West Hendon, sharing a 1.5 km section of its boundary with the regeneration area. It was formed in 1835 by the damming of the river Brent and its unusual shallow depth and sloping banks have supported a particularly interesting habitat for breeding wetland birds, waterfowl and a variety of plants. Any development will be required to respect a buffer zone and protect this area of nature conservation interest. In areas of nature conservation interest, development will also include proposals that contribute to extending and protecting the area's biodiversity and take opportunities to create new habitats for wildlife colonisation."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

Object Tobias

353 /2031 Hill

Comment

I understand that if the plans for Cricklewood go ahead, the substantial waste processing area will be transformed for housing and offices, which in itself is laudable. The considerable disadvantages of decentralising the current waste transfer and recycling units, bringing them closer to housing, will outweigh any advantages of the scheme. Waste transfer traffic will be transferred from specific, purpose-built service roads onto the neighbourhood road network., creating an additional burden for the highly congested Broadway, increasing noise and exhaust pollution in the area. Noise, light and dust pollution from the individual facilities, rather than being partially contained by the centralisation of the units themselves, will be spread out over the residential areas of Cricklewood. Transferral of waste between waste facilities will require additional time and manpower, increasing traffic over the area. Having spoken to a number of workers at the existing plant, the informed opinion was that should the facility be moved, it should be out of London.

Barnet council response

There is no planning application at this stage to be determined and any impacts on residents in the Railway Terraces will be an important consideration when details are submitted as part of a masterplan. This will be after a Development Framework is agreed with the council which will involve further consultation.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|--------------------------|------------|-----|----------|
| Support | Ken | Greater London Authority | | | |
| 188 /2127 | Livingstone | | | | |
| Comment | | | | | |
| The Mayor supports this policy, which is consistent with his Biodiversity Strategy. The Mayor particularly supports the commitment to protect the adjacent Site of Special Scientific interest, and welcomes the fact that the entire SSSI is excluded from the Regeneration Area. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|--------|--------------------------|------------|-----|----------|
| Object | Tobias | | | | |
| 353 /2032 | Hill | | | | |

Comment

The planners go to great lengths to explain how the proposed new transfer stations would generate lower levels of pollution than the old stations. I would like to assure the council that the bulk of the pollution is actually generated by the industrial - grade traffic, an issue that the planners do not address. During my visit to the waste transfer site, traffic entering the facility was almost constant. The noise and dust created by the vehicles was considerable. In addition, the smell and noise created by waste on vehicles compounded the road pollution generated. This was more noticeable than any pollution created as a result of the station's internal operations. For these reasons, under no circumstances should the waste transfer units be built closer to any permanent housing in Cricklewood.

Barnet council response

There is no planning application at this stage to be determined and any impacts on residents in the Railway Terraces will be an important consideration when details are submitted as part of a masterplan. This will be after a Development Framework is agreed with the council which will involve further consultation.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|---------------------------|------------|-----|----------|
| Object | Delle | Brent (London Borough of) | | | |
| 102 /2012 | Odeleye | | | | |

Comment

We support the requirement in this policy for any development to be sustainably designed in terms of the use of energy, materials and needs of users. However, a key principle of sustainable development is the location of major development in areas of very good or good public transport accessibility, in order to reduce the need to travel by car. This is irreconcilable with the fact that Brent Cross, is and will remain, predominantly car-oriented, by virtue of its out-of-centre location on the Strategic Road Network and the extent of free parking available. This means the development will not be sustainable in operational terms, particularly by exacerbating the already poor Air Quality along the North Circular Road. The recent companion guide to PPG6: 'Going to Town' - improving town centre access', has case studies of town centres where poor links have been improved by design. However, there have been no independent studies demonstrating the practical feasibility of effectively integrating an expanded Brent Cross Shopping Centre with development on the other side of the North Circular Road. Without such integration, the development will simply become an even larger, out-of-town, Regional Shopping & Leisure Centre.

Barnet council response

By restricting extra car parking at Brent Cross, introducing mixed uses and bringing in a new population to the area the need to travel by car for the new development will be reduced. A variety of public transport proposals and linkages will be worked through the Framework to be consulted upon to achieve a modal shift towards use of public transport and the integration desired.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---|-------------------|------------|-----------------|
| Object | Julian | Montagu Evans | | | |
| 360 /2314 | Stephenson | Hammerson UK Properties / Standard Life | | | |
| Comment | | | | | |
| Policy can be deleted because the purpose of providing sustainable development is already covered by existing policies GSD, D1 and GBEnv2 | | | | | |
| Barnet council response | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | | | |
| 180 /2227 | Power | Cricklewood Redevelopment Ltd | | | |
| Comment | | | | | |
| Should refer in policy to achieving sustainable travel patterns, mixed-use development and the recycling of brownfield land | | | | | |
| Barnet council response | | | | | |
| Agree however the reasoned justification can deal with the context of the policy | | | | | |
| Change document? | | | | | |
| Add at beginning of the paragraph 1.14 | | | | | |
| "The regeneration of the area will assist in sustainable development objectives by enabling sustainable travel patterns through mixed-use development and the reuse of brownfield land." | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Delle | Brent (London Borough of) | | | |
| 102 /1998 | Odeleye | | | | |
| Comment | | | | | |
| We support the requirement in this policy for any development to be sustainably designed in terms of the use of energy, materials and needs of users. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|-----------------------------------|-------------------|------------|-----------------|
| Object | Eli | Railway Terraces Residents Assoc. | | | |
| 361 /2128 | Jones | | | | |
| Comment | | | | | |
| We would like to see requirements for green space as a barrier between residential and uses such as waste and freight transfer stations. | | | | | |
| Barnet council response | | | | | |
| This matter is too detailed to be included in the chapter. This should be addressed in a masterplan. | | | | | |
| Change document? | | | | | |

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|---|------------|-----|----------|
| Object | Anita | Drivers Jonas | 1.14 | | |
| 369 /2234 | Young | Department of Health and Social Care - London | | | |

Comment

Although DoHSC welcomes the acknowledgement that the regeneration area must include an appropriate mix of uses, we believe that, in the interests of sustainable development, this paragraph should include a reference to the need for the area to be 'self contained' to reduce the need to travel, by providing local services locally.

Barnet council response

Agree

Change document?

Add to 3rd sentence of para 1.14 after "location" ; "and reduces the need to travel."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|--------------------------|------------|-----|----------|
| Object | Matthew | Environment Agency | 1.14 | | |
| 219 /1962 | Ellis | | | | |

Comment

The River Brent is in open concrete channel in the outlined area, not in culvert. The Environment Agency defines a culvert as an enclosed box.

Barnet council response

Change document?

Add to penultimate sentence ; "Brent River should be enhanced where it is in open concrete channel..", instead of "..where it has been culverted."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|--------------------------|------------|-----|----------|
| Object | Matthew | Environment Agency | 1.14 | | |
| 219 /1963 | Ellis | | | | |

Comment

The Agency is concerned that there is no mention in the Chapter of the floodplain and an 8 metre access strip alongside the River Brent.

The Agency would like to see the following change:

In paragraph 1.14 , after "..with regard to the advice from the Environment Agency" insert "There must be no building within 8 metres of the brink of the River Brent. Development will only be acceptable in floodplains where issues of flood risk have been addressed, in line with PPG25, and both environmental and ecological mitigation has been agreed with the Environment Agency. This may include providing more storage outside the floodplain."

Barnet council response

Agree.

Change document?

After "..with regard to the advice from the Environment Agency" insert "There must be no building within 8 metres of the brink of the River Brent. Development will only be acceptable in floodplains where issues of flood risk have been addressed, in line with PPG25, and both environmental and ecological mitigation has been agreed with the Environment Agency. This may include providing more flood water storage outside the floodplain."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|--------------------------|------------|-----|----------|
| Object | Matthew | Environment Agency | 1.14 | | |
| 219 /1964 | Ellis | | | | |

Comment

The Agency would like to see stronger text regarding the requirement that the area's biodiversity be recognised.

Barnet council response

Agree.

Change document?

Delete the eighth sentence in para 1.14 and replace with "In areas of nature conservation interest, developments will also include proposals that contribute to extending and protecting the area's biodiversity and take opportunities to create new habitats for wildlife colonisation."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------|-------------------------------|------------|-----|----------|
| Object | Mary | GVA Grimley | 1.14 | | |
| 180 /2226 | Power | Cricklewood Redevelopment Ltd | | | |
| Comment | | | | | |
| Refer to this part of London for design issues | | | | | |

Need to state that best practice will be "wherever possible"

Barnet council response

Agree on former. Disagree on latter as this is an aspirational statement.

Change document?

Add "this part of London" to fourth sentence

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|------|-----------------------------|------------|-----|----------|
| Object | Sue | Barnet Friends of the Earth | 1.14 | | |
| 286 /2067 | Bird | | | | |
| Comment | | | | | |

The council should be looking to require the whole development to adopt high standards of energy efficiency and to make the best use of natural light by orientation and use of atria.

Suggested amendment: 'employ best practice in terms of energy efficiency, for example the orientation of buildings to make use of solar power and natural light and high standards of insulation (deleting the word encouraging).

At the end of the paragraph an example of innovative building could be given as BedZED in L.B.Sutton.

Barnet council response

Agree with the first suggestion.

Change document?

Delete "encouraging" from the fifth sentence in para 1.14.

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|--------------------------|------------|-----|----------|
| Object | Nick | English Nature | 1.14 | | |
| 269 /1973 | Radford | | | | |
| Comment | | | | | |

Further English Nature object to the inadequate reference to legally protected species. English Nature requests, in addition to the above amendments a statement is made within the supporting text cross-referencing Species Protection Policy 016 of the Revised Deposit UDP (2001).

Barnet council response

Change document?

Add after 7th sentence of para 1.14 "(See Policy 016 of the Revised Deposit UDP with regard to legally protected species) "

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|------------------------------|------------|-----|----------|
| Support | Ray | North London Waste Authority | 1.14 | | |
| 366 /2187 | Dodds | | | | |
| Comment | | | | | |

L.B.Barnet's commitment to using recycled building materials is welcomed.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | P.J | Community Foods Ltd. | 1.14 | | |

346 /2002 Woodhams

Comment

The greatly increased retail space will create substantial increases in car traffic. This will be bad for the local environment. If the extra retail space is successful, the roads outside the area but feeding into the regeneration area will not be able to cope. The resulting traffic congestion will put off shoppers and the retail units could end-up as white elephant eyesores.

Barnet council response

The regeneration scheme seeks to encourage people to travel by public transport.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.14 | | |

188 /2124 Livingstone

Comment

The fourth sentence should be amended to emphasise qualitative importance/aspiration of redevelopment criteria

There is no reference to Sustainable Urban Drainage, this will be a particularly relevant design issue for this area as parts of the River Brent are liable to flooding, this is called for by Policy BR7 of the Blue Ribbon Annex.

Barnet council response

agree

Change document?

Replace "A high standard" with "The highest standards" in 4th sentence.

Insert "sustainable urban drainage and" between "encouraging" and "energy efficiency" in the fifth sentence.

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Twiggy | Metropolitan Police | 1.14 | | 6 |

349 /2014 Shrub

Comment

There is no mention of enhanced security and reducing the fear of crime.

Barnet council response

This is contained in the sixth sentence.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|---------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Anita | Drivers Jonas | 1.14 | | |

369 /2233 Young

Department of Health and Social Care - London

Comment

The DoHSC welcomes the acknowledgement that the regeneration area must include an appropriate mix of uses.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|--------------------------|------------|-----|----------|
| Support | Ken | Greater London Authority | 1.14 | | |
| 188 /2126 | Livingstone | | | | |
| Comment | | | | | |
| The Mayor supports the commitments to protect areas of nature conservation interest, to take opportunities to create new wildlife habitats, and to enhance the nature conservation and amenity value of culverted sections of the River Brent. These suggestions are all consistent with the Mayor's Biodiversity Strategy. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|--------------------------|------------|-----|----------|
| Object | Ken | Greater London Authority | 1.14 | | |
| 188 /2123 | Livingstone | | | | |
| Comment | | | | | |
| Accessible environments. Although the sentiments of the paragraph are supported accessibility is a matter for all and not just those with disabilities, children or the elderly. The concept of an inclusive environment as explained in the draft London Plan (paragraphs 4B.19 to 4B.20 and Policy 4B.5) should be referred to here. | | | | | |
| Barnet council response | | | | | |
| agree | | | | | |
| Change document? | | | | | |
| Add "accessible by all, including.." in 6th sentence of para 1.14 | | | | | |

C5 - New Town Centre

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|--------|--------------------------------------|------------|-----|----------|
| Object | David | West Hampstead Amenity and Transport | | | |
| 363 /2173 | Levene | | | | |
| Comment | | | | | |
| While C5 indicates that the council will seek to maintain and enhance the viability of Brent Cross / West Hendon /Cricklewood, nothing has been said as to how this would be done. West Hampstead and Finchley Rd should be taken into account. | | | | | |
| Suggest amending Policy C5, after 'Cricklewood' in line 4 add '. . . And West Hampstead and Finchley Road'. Add at the end: 'The council will make proposals to enhance the centres listed above to ensure their continued viability'. | | | | | |
| Barnet council response | | | | | |
| Stricter tests are to be contained in an amended policy C5. | | | | | |
| Change document? | | | | | |
| See change 372/2294 | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | | | |
| 372 /2294 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

MHT/ Lovell objects to the absolute prohibition on retail uses outside the defined town centres within the regeneration area, contained in Policy C5. This is not consistent with PPG6 , which applies a criteria-based assessment to be made of any proposals. There may well be justification for neighbourhood shops or other commercial facilities in view of the potential numbers of houses to be provided.

Barnet council response

Agree. The reference to the tests originating in PPG6 are to be referred to.

Change document?

Addition of new paragraph 1.15;

"Existing town centre

Cricklewood, a district centre, and West Hendon, a local centre both suffer from the adverse effects of traffic on the main road (A5) and have higher proportions of vacant shops than many other centres in the borough. They do, however, provide a variety of services to local people and function as part of a network of centres in north London. As part of the housing-led regeneration of West Hendon the council is working in partnership with developers and local traders to improve the town centre. The Development Framework for the wider regeneration scheme will need to demonstrate economic, social and environmental benefits to these two centres, for example, by providing appropriate training, town centre management, more attractive physical environment and improved public transport."

Delete last sentence of policy C5 to be replaced with "Proposals for the development of new retail and other key town centre uses will be considered in accordance with policies TCR1, TCR5 and TCR7."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | | | |
| 188 /2133 | Livingstone | | | | |

Comment

Change required to clarify definition of Brent Cross; it is a shopping centre and not a town centre.

Insert in line three between "Brent Cross" and West Hendon" the words "shopping centre"

Barnet council response

Agree and Brent Cross has been removed from the policy as an existing town centre.

Change document?

Remove from policy C5 "Brent Cross" and see change 372/2294

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Mason Richards Planning | | | |
| 354 /2050 | Fenwick | Castlemore Securities Ltd | | | |

Comment

Reference to 'Brent Cross' within policy C5 should be appropriately defined. It is assumed that this is intended to refer to the wider New Brent Cross Town Centre Area identified on the Proposals Map. If this is the case, it should be explicit that the reference to Brent Cross is the 'new Brent Cross town centre' within the policy. The prohibition of retailing uses outside of these defined centres runs contrary to the Government guidance in PPG6, which acknowledges that there will be circumstances when out-of-centre retail development is appropriate. The policy should reflect, that subject to the identification of need, and the application of the sequential approach, retail development may occur beyond the defined town centres.

Barnet council response

Agree that the test needs to be tightened.

Change document?

See change 372/2294

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Delle | Brent (London Borough of) | | | |

102 /1999 Odeleye

Comment

The reference to Brent Cross should be removed, as it is not a town centre. This view was endorsed by the Inspector's report following the Inquiry into the proposed extension to Brent Cross. This view has so far, not been challenged.

Barnet council response

Agree.

Change document?

See change 188/2133

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|----------------------------------|-------------------|------------|-----------------|
| Support | Nicki | Nathaniel Lichfield and Partners | | | |
| 370 /2254 | Mablesen | Capital Shopping Centres | | | |

Comment

Capital Shopping Centres support Policy C5 which aims to maintain and enhance the vitality and viability of Brent Cross, West Hendon and Cricklewood town centres.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | P.J | Community Foods Ltd. | | | |

346 /2004 Woodhams

Comment

A new town centre dissected by the A406 North Circular Rd has no chance of being a single centre. No pedestrian will want to walk from the existing shopping centre across the Nth Circular to new retail areas on the south side.

Barnet council response

The Development Framework will need to demonstrate how both sides will be integrated through the provision of linkages.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | 1.15 | | |
| 180 /2228 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Disagree with designating Brent Cross as an existing town centre and need to state that retail will go north and south of the North Circular Road with needs for community benefits.

Barnet council response

Agree

Change document?

See changes to policy C6 that supports a new Brent Cross town centre.

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Barry | Robert Turley Associates | | | |
| 168 /2208 | Cansfield | Sainsbury's Supermarkets Ltd | | | |

Comment

The presumption against retail development outside the defined town centres of Brent Cross, West Hendon and Cricklewood is contrary to the advice contained within PPG6, which allows for such development providing key criteria such as retail need, the sequential approach and impact are met.

We recommended that Policy C5 is amended to allow for edge and out-of-centre retail development in appropriate cases.

Barnet council response

Agree.

Change document?

See changes 188/2133 and 372/2294

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | | Peacock & Smith | | | |
| 359 /2089 | | WM Morrison Supermarkets PLC | | | |

Comment

To state that retail development will not be supported outside the three town centre mentioned is contrary to PPG6 which states that if there are no sites within town centres other sites may be considered. Need to add to end of policy C5;

" unless a need for such development is identified, and no town centre sites are available to accommodate the proposal. In these circumstances, the proposals will need to be consistent with the sequential approach to site selection set out in PPG6."

Barnet council response

Agree

Change document?

See change 372/2294

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Julian | Montagu Evans | | | |
| 360 /2315 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

Agrees that retail development should be directed to Brent Cross on the map as changed

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Renato | Watford Council | 1.16 | | |

365 /2188 Messere

Comment

Objection is made to this policy because the stated objective of maintaining and enhancing the vitality and viability of the existing West Hendon and Cricklewood Town Centres is unlikely to be achieved by any significant additional retail development in the Brent Cross Area. It may be more sustainable to regenerate existing centres in the area, particularly Cricklewood Town Centre which already provides for the local community and is well linked to the surrounding area by a range of means of transport.

The extent to which Brent Cross might contribute to regeneration in this area should also reflect the important role of existing town centres in the wider North London area. There is concern about the potential impact on towns such as Watford. Watford is currently classified as a major sub-regional centre. Its catchment extends into North London. Any future expansion around Brent Cross could affect the balance of market share and undermine the vitality and viability of Watford's Town Centre where retailing is the major employer.

Suggest following rewording:

The Council will seek to maintain and enhance the vitality and viability of Brent Cross, West Hendon and Cricklewood town centres. Retail development and other major trip generating uses will be carefully assessed in terms of impact on these centres and existing centres in the wider north London area and will not be permitted in areas outside these centres as defined on the proposals map.

Barnet council response

Agree

Change document?

See change 372/2294

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mide | Government Office for London | | | |

187 /2022 Beaumont

Comment

Policy C5

Included within the section of the chapter entitled "New Town Centre" this policy seeks to maintain and enhance the vitality and viability of Brent Cross, West Hendon and Cricklewood town centres. As currently drafted, the first sentence of the policy implies that Brent Cross is already a town centre.

For clarification and the avoidance of doubt, the policy should be relocated elsewhere within the chapter and be amended to refer only to seeking to maintain and enhance the vitality and viability of the existing West Hendon and Cricklewood town centres.

Barnet council response

Reference to Brent Cross will be removed reference will be made to the tests of PPG6 contained in the existing town centre policies.

Change document?

See changes 188/2133 and 372/2294

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Sue | Barnet Friends of the Earth | | | |

286 /2072 Bird

Comment

Enhancing retail at Brent Cross will inevitably be at the cost of West Hendon and Cricklewood town centres. If the catchment area of Brent Cross includes towns lying outside the M25 (as stated in 1.16) the need to travel is not being reduced and enhancement of Brent Cross cannot be viewed as sustainable.

Suggested replacement policy: 'There will be no retail development at Brent Cross until the regeneration of West Hendon and Cricklewood is in place. . '

Barnet council response

The tests for retail development will be outlined.

Change document?

See change 372/2294

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Donald | Camden (London Borough of) | | | |

367 /2200 Chambers

Comment

Brent Cross is not a town centre and its becoming one is dependent upon integration with the area to the south of the North Circular Road. The policy fails to acknowledge that there is a profound difference between the character and function of West Hendon and Cricklewood Town Centres and Brent Cross.

The policy should acknowledge that development of Brent Cross as a town centre is conditional on development of the Cricklewood area and the integration of the two localities, and the different characters and functions of the three centres.

Barnet council response

Agree.

Change document?

See changes 188/2133 and 372/2294

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Carol | The Finchley Society | 1.15 | | |

263 /2160 Halls

Comment

The draft London Plan at 2B.101 (p102) states: '... The planning framework should seek the redevelopment of Brent Cross as a town centre complementing the roles of other centres nearby'. This wording is not restated elsewhere in the document and should be included in this paragraph.

Suggest : 'The planning framework should seek the redevelopment of Brent Cross as a town centre complementing the roles of other centres nearby'.

Barnet council response

The proposals seek a redevelopment towards a mixed use town centre.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|---------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Ken | Greater London Authority | 1.15 | | |

188 /2131 Livingstone

Comment

The identification of the need for an improved (i.e. expanded) bus station is welcomed

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.15 | | |

188 /2130 Livingstone

Comment

Concerned about the implications of the paragraph in particular the reference to the need to maintain the ground and first floor of the existing floorspace at Brent Cross in order "to maintain an attractive retail centre". If Brent Cross is to evolve into a real town centre, with an integration of uses, then there is concern about how the existing shopping centre is to be treated - it is accepted that some redevelopment, will be essential for integration. The site plan at the end of the chapter seems to indicate no changes to the existing floorplate. It is not appropriate for the shopping centre to be isolated (potentially closed after hours) from the centre. There is also concern that no mention is made of the need to consider the development of the new town centre in relation to other neighbouring town centres - their vitality and viability will need to be considered. This point is heightened by the fact that reference is made to "additional retail floorspace". A significant increase in retail floor space in isolation of other mixed uses is not envisaged by the draft London Plan but rather the integration of other land-uses and development, as part of any retail expansion of the shopping center, including land to the south of the A406 North Circular Road.

Barnet council response

This is not the intention and the complete redesign of the existing shopping centre will be the subject of a masterplan application following the production of a framework.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.15 | | |

188 /2129 Livingstone

Comment

Correction of factual information. The draft London Plan does not define the area as a major town centre.

In the third sentence delete "major" and replace with "new".

Barnet council response

The intentions are for the creation of a major town centre from a regional shopping centre

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Railfuture London Branch | 1.15 | 1,16 | |
| 368 /2281 | Dyall | Railfuture | | | |

Comment

The town centre described is far in excess of local needs. It would appear that some of the present Brent Cross centre is to be turned into offices and extended with more shops at the low level. This sounds illogical. Who will pay for the bus services beyond the M25 and to what purpose. The fact you are considering the necessity of this means you are going to build a major regional centre.

Barnet council response

Brent Cross already is a regional shopping centre and this proposal provides for a mix of uses so that the new residents may not need to travel as far for services and jobs.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.16 | | |

188 /2132 Livingstone

Comment

Gives the impression that the developer would be required to provide new services to specific locations, when decisions relating to the provision of new bus services and their routings would in reality be made by TfL. The UDP should clarify this, and establish that the borough's ideas for future bus network development are at this stage aspirations (possibly as future Section 106 funding targets) that will require further discussion with London Buses.

The new bus station must meet the requirements of the Mayor's Transport Strategy. It is important that the design of a new bus station at Brent Cross is closely linked to any proposal for a facility at Cricklewood. By the nature of the area, the majority of routes likely to serve Cricklewood will be extensions of routes that currently terminate at Brent Cross. This effectively means that Cricklewood will and must have a direct influence on the design of Brent Cross. The possibility of dedicated infrastructure for the RTS will also have a significant impact on design for both locations, but in particular Brent Cross where the implications for the existing agreed design would be severe.

Barnet council response

Agreed however the text touches on these issues which will need to be worked out in detail in the framework, strategy and masterplans.

Change document?

C6 - New Town Centre and paras 1.13, 1.15 & 1.16

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.13 | | |

188 /2117 Livingstone

Comment

The proposals to physically link the centre into the wider area for regeneration are supported. However, proposals should be broader than those set down in the draft chapter and should aim to alter perceptions and visual links between the existing and the proposed. It will not be enough to physically link with new bridges if Brent Cross still appears to sit in splendid isolation within its car parks with blank, blind walls and entirely inwards facing activities and interest. Although it is understood that imposing change on the existing is problematic it is suggested that policy C6 and chapter text requires physical change to Brent Cross to visually and functionally link it to surrounding activities and areas. This would be in line with general principles of urban design incorporating site lines, activity routes, magnets etc and should be embedded in the design framework for the area.

In addition, something needs to be said about how the large existing Brent Cross car parks can be used to help support wider uses over time and location.

Barnet council response

Agree

Change document?

Add to beginning of para 1.16 "The Development Framework will be required to propose an urban design solution to the transform the existing inward looking, single use shopping centre into the core of a vital and viable town centre."

Add as penultimate sentence of para 1.16 "The existing shopping centre is surrounded by car parking which is used during the day when the shops are open. The mix of uses proposed will be able to make more efficient use of this car parking."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Donald | Camden (London Borough of) | | | |
| 367 /2203 | Chambers | | | | |
| Comment | | | | | |
| Although objecting to the significant expansion of retail at Brent Cross we welcome the principle that the localities on either side of the North Circular Road be integrated. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Donald | Camden (London Borough of) | | | |
| 367 /2201 | Chambers | | | | |
| Comment | | | | | |

Significant enlargement of Brent Cross' retail floor area will have a serious negative impact on town centres within Camden, in particular it would have a negative impact on the vitality and viability of the Kilburn High Road town centre and will prejudice the regeneration programme in Kilburn. Before any expansion takes place at Brent Cross an assessment of need for additional retail floorspace must be conducted and a comprehensive Retail Impact Assessment should be carried out as to the impact on other centres in compliance with PPG6, and if found to have a negative impact development should not be permitted. We acknowledge that there may be a need to increase retail floor area to meet the increased demands of an enlarged residential population and the anticipated growth in disposable incomes, but, enlargement should not be aimed at capturing custom from existing centres.

Significant expansion of retail floorspace at Brent Cross will inevitably lead to an increase in traffic as additional people are attracted to the centre (especially if retail extension is on the scale previously proposed) resulting in additional traffic pressure on local roads and loss of amenity to Camden residents in the Cricklewood area. Additional traffic will further exacerbate the problems of congestion along Cricklewood Broadway and Kilburn High Road creating a less pleasant shopping environment in the Kilburn town centre undermining attempts to regenerate the Kilburn area. It is considered that improvements to public transport may not be sufficiently attractive to shoppers and that improvements to public transport should not be seen as sufficient to ameliorate the impact of significantly increased retail floorspace.

The policy should include an additional clause 7 - "Not having a detrimental impact on other town centres.", and requiring that an assessment of need and impact is carried out.

Barnet council response

Agree that a test needs to be referred to and the affect on town centres in the sub-region.

Change document?

Add to paragraph 1.15 after 2nd sentence; "The shopping centre has the support for expansion under RPG3, subject to public transport improvements. However, it does not have the diversity of uses necessary to be defined as a town centre in accordance with PPG6. Consequently, any retail expansion will have to meet the tests of PPG6 and subsequent ministerial statements by establishing that there is a need for the development. The council considers that the benefits provided through regeneration of this part of north London justify additional retail floorspace, the amount of which must be determined through testing the viability of the regeneration of the wider area and impact on the hierarchy of existing town centres in the sub-region."

Add at end of para 1.15 "As a result of the development, the council considers that Brent Cross will perform the function of a major town centre serving a catchment area wider than the borough. There will be a mix of convenience and comparison shopping totalling more than 50,000 square metres, and a variety of leisure and entertainment uses."

In policy C6 add after "Brent Cross" ; "as part of a new town centre extending north and south of the North Circular Road (A406)".

Add to end of point 1 of policy C6 "and supported by the results of a retail impact assessment."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Julian | Montagu Evans | 1.15 | 1.16 | |
| 360 /2316 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

Need to introduce a test to replace the need being justified by regeneration of the area in point 1. This would be that retail floorspace should be determined according to its effect on the retail hierarchy. Add criteria 1. From C7 added as a seventh criteria in policy C6 as this is amore suitable location. Need to make changes to paragraphs correspondingly. No major town centre will be created but an existing one expanded.

Barnet council response

Agree in first part and will add reference to the effect of an extension of Brent Cross on the retail hierarchy. However road issues can be grouped with other transport issues in policy C7 as the emphasis more on making the centre more accessible by public transport.

Change document?

See change 367/2201

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Ken | Greater London Authority | | | |
| 188 /2115 | Livingstone | | | | |

Comment

The proposals to physically link the centre into the wider area for regeneration are supported.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Anita | Drivers Jonas | 1.15 | | |
| 369 /2235 | Young | Department of Health and Social Care - London | | | |

Comment

The DoHSC supports and welcomes the reference in paragraph 1.15 to a greater provision of community facilities in the new town centre.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | 1.15 | | |
| 180 /2247 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Need to refer to C1 and the masterplan concept.

Barnet council response

Agree

Change document?

Add as 4th sentence and end of new para 1.15a "This will be achieved through the preparation of a Development Framework, adopted as Supplementary Planning Guidance by the council"

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

Object
263 /2155 Carol
Halls

The Finchley Society

Comment

Policy does not address the likely effect of expansion of retail space at Brent Cross on other centres and the need for new development to complement them. One of the simplest ways is to ensure a more level playing field in terms of attractiveness to car borne shoppers. Although C6 (5) is intended to encourage a switch to other modes it does not spell out what measures are to be taken - parking charges are an essential device.

Amend policy to read: 'Measures, including the imposition of car parking charges to encourage. . . .'

Barnet council response

Agree

Change document?

Add to end of para 1.16 "Measures to encourage the greater use of public transport could include introducing car parking charges."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

Object
359 /2092

Peacock & Smith
WM Morrison Supermarkets PLC

Comment

If Brent Cross is a town centre then there is no need, under PPG6, to justify retail development there and criterion 1 should be deleted.

Barnet council response

It is not considered that Brent Cross is a town centre in the wider definition of PPG6.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

Support
365 /2185 Renato
Messere

Watford Council

1.16

Comment

Support for the criteria based approach of this policy.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Mason Richards Planning | | | |
| 354 /2051 | Fenwick | Castlemore Securities Ltd | | | |
| Comment | | | | | |

As with policy C5, the Council should define reference to Brent Cross in the opening of this policy. Again it is assumed to be the new Brent Cross town centre as defined on the Proposals Map.

If this is the case, then it is uncertain why additional retail floor space should be the subject to any test of 'need', which is a test only usually applied to either edge-of-centre or out-of-centre retail development. Need is not a test which PPG6 or subsequent Ministerial Statement, indicates should be applied to town centre sites.

To this end, the difference between the April 2001 Regeneration Brief explicitly identifying that new retail use is expected to be located immediately to the north and south of the A406, and the absence of any such indication within the Additional Chapter is noted.

Given the Council's objectives in encouraging a range of town centre type uses such as approved public transport facilities, shops, services, leisure, restaurants, hotels etc., it may be appropriate for the policy to further clarify the areas within which retail uses will be encouraged, as opposed to those areas where other town centre type uses might be encouraged. This is likely to include those areas with extant consents.

With regard to sub-clause 4, reference to 'the centre' should be clarified as to whether it means the new town centre generally, or the existing Brent Cross shopping centre specifically.

Supporting text in paragraph 1.16 to the policy refers to 'a major element of the scheme will be provided by the new bridge over the North Circular Road that must be designed so that pedestrians and cyclists feel secure in using it.'

Again, the plan needs to be clear when it refers to 'the scheme', as to which scheme it refers to, is this the same as the outline 'proposal' referred to earlier or is it some other scheme? Some additional explanation and clarification in respect of 'the new bridge over the North Circular' would also be of assistance. Who is to design it, when is it to be designed, when is it to be implemented, how is it to be implemented, who should implement it? None of these important questions appear to be addressed by the Additional Chapter.

Barnet council response

The further guidance will be given in a Development framework and Masterplans to clarify the detail of where retail floorspace should go to be followed by landowners in the Regeneration Area.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------------|-------------------|------------|-----------------|
| Object | Jean | Woolmead Avenue Residents Association | | | |
| 285 /1989 | Ivatt | | | | |
| Comment | | | | | |

West Hendon regeneration plans include updating and improving the local shopping centre on West Hendon Broadway. There are also proposals for an 80 - 100 bed hotel and Tesco Metro store. Surely any expansion of Brent Cross will negate these improvements as more trade will be lost to Brent cross. The existing Brent Cross is already responsible for the demise of all the surrounding shopping areas, leaving local people with a poor choice and uneconomical shops. Pull down the shops in West Hendon Broadway and widen the road. Replace with affordable flats for key workers.

Barnet council response

The affects of a new town centre on West Hendon will be assessed and the Development Framework will propose improvements to West Hendon town centre to be funded through the regeneration scheme.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Renato | Watford Council | | | |
| 365 /2186 | Messere | | | | |
| Comment | | | | | |

An additional criterion should be added in that additional retail development at Brent Cross will also be subject to the carrying out of a full qualitative and quantitative retail analysis of the wider catchment area.

Any future planning application should also be accompanied by a full retail impact assessment to assess the impact on nearby towns, district or local centres in terms of their impact on vitality and viability. Economic and environmental impacts need to be considered along with the cumulative impact of recently completed developments and outstanding planning permissions in the catchment areas of these centres (paragraph 4.13 of PPG 6 refers).

With respect to cumulative impact, the outcome of the legal challenge into plans for an extension at the existing Brent Cross Complex should also be taken into account in terms of the additional retail floorspace that can be created within the Opportunity Area.

Suggest additional criterion:

"The carrying out of a full qualitative and quantitative retail analysis of the wider catchment area including a retail impact assessment."

Barnet council response

Agree

Change document?

See change 367/2201

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | | | |
| 180 /2246 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Need to reflect C5 change

Barnet council response

Agree

Change document?

Add to policy ;

"The Council will support additional retail development at Brent Cross [add "as part of a new town centre extending north and south of the North Circular Road"], subject to;"

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Sue | Barnet Friends of the Earth | | | |
| 286 /2075 | Bird | | | | |

Comment

If development takes place in the order in which it is set-out in this draft plan, there is the possibility of Brent Cross merely becoming an expanded retail area. If it is to lay claim to being a town centre, then other aspects of town life must be in place before any expansion of retail is considered. A town centre is far more than a retail area, and at present Brent Cross could only be described as a shopping centre. The policy needs to state clearly the order in which regeneration should be tackled.

Suggested amendment to policy: 'The council will support additional retail development at Brent Cross subject to the following order:

1. Improved air quality to meet European standards
2. The provision of significantly enhanced public transport improvements.
3. The provision of new housing.
4. The provision of community facilities within the new town centre of Brent Cross and also close to housing e.g. meeting halls, recreational areas, parks, open spaces.
5. As 3 in draft.
6. As 4 in draft.
7. As 5 in draft but to add ' measures to encourage residents, shoppers and . . . '
8. As 1 in draft.
9. As 6 in draft.

Barnet council response

The ordering of the criteria is not significant. It is not possible to impose suggested criteria 1 being within the ambit of an air quality strategy produced by the council. Agree to include housing and community as part of the mix of uses in a new town centre. .

Change document?

See change 187/2025 relating to provision of housing and community facilities. Agree to add "residents" as part of point 5 of policy C6

| | Name | Organisation name/Client | Para start | end | Page no. |
|-------------------------------------|----------|------------------------------|------------|-----|----------|
| Object | Mide | Government Office for London | | | |
| 187 /2025 | Beaumont | | | | |
| Comment | | | | | |
| Absence of a new town centre policy | | | | | |

Paragraphs 1.15 and 1.16 and policies C5 and C6 are located within the section of the chapter headed "New Town Centre". However, there is not a specific policy included regarding the creation and development of the proposed new town centre of Brent Cross within the wider Regeneration Area.

To address our concerns, the Council should either include a separate policy on the creation of a new town centre, or develop policy C6 so that it refers to the whole range of town centre uses. Whichever approach is adopted, the policy content might usefully develop the mix of uses / key components outlined in the third sentence of paragraph 1.15. It should also explain the wider role that it is envisaged the new town centre depicted on the proposals map would play, both as fully integrated into the comprehensive redevelopment for the wider regeneration area and, at the sub regional

level, set within the established hierarchy of centres in this part of north London. In terms of housing and employment uses envisaged within the proposed new town centre, the relationship with policies C9 and C10 should be explained – especially in relation to the location of B1 office uses likely to generate a lot of people. (See also our objection to policy C6).

Barnet council response

Agree. The requirements for a mixture of uses will be stated as a criteria of the policy C6. An expectation of significant job growth (including offices) of at least 5,000 jobs will be stated as being required in the new town centre, where it will be near the new railway station or other equivalent public transport improvements. The other employment relating to railway and other office jobs are as described in policy C10.

Change document?

Substitute for the 3rd sentence in a new paragraph 1.15b; "To create a town centre requires a rich texture of facilities and activities to be accessible to residents in a pedestrian-friendly environment. A mix of uses will be expected on different floors on individual sites as well as over the area to create a synergy. The key components of the new town centre must include improved public transport access, a mix of uses including residential, businesses, a greater variety of shops and services, leisure, restaurants, hotels and community facilities (including primary healthcare facilities) as well as the additional retail floorspace."

Add as new 2nd criteria for policy C6 "The provision of a broad range of uses, to include homes, business units, leisure, sports facilities, entertainment, restaurants, hotels, community facilities and open space, in a pedestrian-friendly environment."

Add to before the 4th sentence of paragraph 1.15 "A minimum of 5,000 jobs (including in office development) will be required to be created in the new town centre to the year 2016. "

Add to end of paragraph 1.22 "Policy C6 gives a guideline of 5,000 jobs to be created in the new town centre."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|---|---------------------------------|-------------------|------------|-----------------|
| Object | Anita | Drivers Jonas | | 1.15 | |
| | 369 /2236 | Young | | | |
| | Department of Health and Social Care - London | | | | |

Comment

The DoHSC supports and welcomes the reference in paragraph 1.15 to a greater provision of community facilities in the new town centre. However, for the avoidance of doubt, we would like to see a specific mention to primary healthcare facilities as an example of an acceptable community facility.

Some non-retail uses - such as primary healthcare facilities – can make a positive contribution to the vitality and viability of a town centre. Uses such as doctors or dentists can generate high numbers of visitors while also meeting an important local need, locally. This also assists in building sustainable communities by reducing the need to travel and/or by enabling local people to make multi-purpose trips to their local centre.

The UDP should provide a positive planning framework which enables the implementation of the Government's plans for a modern NHS. This is further supported by PPG6 which identifies health facilities as appropriate town centre uses because they attract a lot of people and can therefore contribute to the vitality and viability of the centre.

Barnet council response

Agree

Change document?

Add in 3rd sentence "(such as primary healthcare facilities)" after "community facilities"

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|----------|------------------------------|------------|-----|----------|
| Object | Mide | Government Office for London | | | |
| 187 /2024 | Beaumont | | | | |
| Comment | | | | | |
| Policy C6 | | | | | |

This policy outlines the circumstances in which the Council would support additional retail development at Brent Cross. Part 1 of the policy states that the need for additional floorspace should be justified by the regeneration of the Cricklewood, West Hendon and Brent Cross Regeneration Area as defined on the proposals map.

The reference to 'need' for additional retailing should be defined in relation to Government policy set out in PPG6 and subsequent policy statements. The policy should make clear the relationship between additional retailing and the proposed new town centre as this ambiguity conflicts with PPG6 which seeks the provision of retail uses within town centres. In outlining the circumstances whereby the Council would support additional retail development at Brent Cross, the introductory policy text might usefully cross refer to any new town centre policy included in the chapter. (See also our objection to the absence of a new town centre policy).

Barnet council response

Agreed. Changes are made to refer to retail impact assessments.

Change document?

See changes under 187/2025 and 361/2201.

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|--------------------------|------------|-----|----------|
| Object | Ken | Greater London Authority | | | |
| 188 /2143 | Livingstone | | | | |
| Comment | | | | | |

Point /sub-section 2 contains a superfluous word: "enhanced public transport improvements".

Suggest either "significantly enhanced public transport" or "significant public transport improvements."

Barnet council response

Agreed

Change document?

Change 2nd point of policy C6 to state "significant public transport improvements."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|----------|----------------------------------|------------|-----|----------|
| Object | Nicki | Nathaniel Lichfield and Partners | | | |
| 370 /2255 | Mablesen | Capital Shopping Centres | | | |
| Comment | | | | | |

It is essential that the application of policy C6 reflects the wider Government policy. In particular, the issues of need, retail impact and the sequential approach need to be addressed in decision making on new floorspace and this must take account of existing centres within and outside the regeneration area.

Suggest the policy is reworded to ensure that no new floorspace is allowed at Brent Cross until the various criteria set out above have been met.

Barnet council response

Agreed. The policy is to be changed to consider the tests as set out in PG6.

Change document?

See change 367/2201

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|--------------------------|------------|-----|----------|
| Object | Ken | Greater London Authority | | | |
| 188 /2134 | Livingstone | | | | |
| Comment | | | | | |

To ensure that high levels of car parking are reduced, insert within subsection 5, in line three after "private car" add " including the reduction of car parking levels or the ratio of parking to commercial floorspace, both existing with proposed additional"

Barnet council response

This is addressed in policy C8

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|--------------------------|------------|-----|----------|
| Object | Keith | Railfuture London Branch | | | |
| 368 /2331 | Dyall | Railfuture | | | |

Comment

Rents have fallen at Brent Cross by 1% between 1999 and 2002 when they have risen in town centres (Edgware 14%, Golders Green 12%, Wembley 50%) and large stores have left the area (Food Giant at Cricklewood and Safeway at Brent Cross). The other shopping areas are far older and more in need of upgrading than Brent Cross.

Barnet council response

The UDP addresses the issue of maintaining and enhancing existing town centre in the London Borough of Barnet.

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|--------|-------------------------------|------------|-----|----------|
| Object | Gary | Mappin Planning & Development | | | |
| 172 /1990 | Mappin | Warner Village Cinemas | | | |

Comment

As well as providing no justification in support of a new town centre, there is no reference to scale and land uses. If a clear need has been identified, this justification could be presented, and should be made available for comments, given the detailed scope of the UDP.

There is broad reference to other town centre uses in para 1.15 but again no clear justification provided on need, scale, content and mix. Draft policy C6 refers to further work being carried out to consider the need for additional floorspace. This should have already been carried out if a clear need has been identified for further retail development

and, indeed, a new town centre. If this policy is to stand it also needs to consider the detailed justification for other key town centre uses e.g. major leisure development. Policy C6 should be amended to include a requirement to consider the need for additional major leisure development.

Barnet council response

The Development Framework will examine the justification for new retail and other town centre uses.

[Change document?](#)

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|--------|--------------------------|------------|-----|----------|
| Object | Twiggy | Metropolitan Police | 1.16 | | 7 |
| 349 /2015 | Shrub | | | | |

Comment

Consideration should be taken of those passing under the bridge - design should reflect the possibility of objects being thrown into the road from the bridge.

Barnet council response

This is too detailed a matter for the UDP

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|------|-----------------------------|------------|-----|----------|
| Support | Sue | Barnet Friends of the Earth | 1.16 | | |
| 286 /2071 | Bird | | | | |

Comment

Support that bridge design should enable pedestrians and cyclists to feel secure in using it, by implication safe from other users of the bridge and safe when using it at night.

Barnet council response

Support noted

[Change document?](#)

C7 - Transport

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|---------|--------------------------|------------|-----|----------|
| Object | Jessica | | | | |
| 352 /2282 | Howey | | | | |

Comment

Believe that waste and freight transfer should not be allowed to take place so close to the terraces, as it would have hugely detrimental effect on the terraces and quality of life of the residents. Policy C7 which states that "permission for the development will not be granted unless the plan includes provision of both waste and freight transfer on site" should be removed from the UDP as it means that Barnet must have these facilities even if the developer decides otherwise.

Barnet council response

It is considered that new facilities will be required to meet the needs for waste transfer, recycling & rail freight in this part of London.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|-------------|--------------------------|------------|-----|----------|
| Object | Ken | Greater London Authority | 1.20 | | |
| 188 /2146 | Livingstone | | | | |

Comment

To ensure that the facility meets the legislative requirements for waste, new sub-section F should read: "Retention or replacement of a waste management facility(s) which would enable North London Waste Authority to meet both its statutory Best Value performance standards for household waste recycling/composting and the requirements of the EU Landfill Directive; and G) Priority "."

Barnet council response

Agreed, however the performance issues can be stated in the r.j.

Change document?

new sub-section F should read: "F) provision of an enhanced waste transfer station serving north London"

Add as new sentence on 3rd line of para 1.20 ;

"The operational needs of a replacement must enable the North London Waste Authority to meet both its Statutory Best Value performance standards for households waste, recycling and composting and the requirements of the European Union Landfill Directive."

C7 - Transport

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|-------|--------------------------|------------|-----|----------|
| Object | David | | 1.19 | | |
| 341 /1965 | Lang | | | | |

Comment

The proposed development of a Strategic Freight Site contravenes section 45 of the DTLR PPG13. Plans must be made to allow for more rail freight movement here in accordance with government policy as the Government's ten year Transport Plan expect a growth in rail freight of 80%. A major area of railway land on the east side of the main line should be developed for rail freight, which could be phased in if the basic infrastructure was in place and the appropriate part of the site preserved from other uses.

Barnet council response

The chapter does not specify which part of the Employment land site would be for rail freight.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

| | | | | | |
|------------------|---------------|--|--|--|--|
| Object | John Miller | | | | |
| 374 /2326 | Lesley Turner | | | | |

Comment

It shouldn't be imperative that the waste and freight transfer facilities are located in Cricklewood if a developer finds a more suitable site.

One requirement should be an improvement to surface water drainage in the area which floods the sewers in Cricklewood Lane.

Provision should be made to ensure that the existing station is kept in use - can this be done through a S106 agreement?

Traffic management and risk to life from traffic is also a concern.

Barnet council response

The area is considered an appropriate location for such transfer facilities. Utilities services will be necessary as stated in the r.j. and policy C1 including surface water drainage. Changes to the r.j. of policy C4 (para 14a) on sustainable development touch upon the flooding issues requiring assessment under PPG25.

The retention of the railway station will be a matter for the Strategic Rail Authority. Detailed design matters will need to be submitted to be consulted upon later on in the planning process.

Change document?**C7 - Transport**

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

| | | | | | |
|------------------|-------|----------------------|--|--|--|
| Object | Carol | The Finchley Society | | | |
| 263 /2164 | Halls | | | | |

Comment

The rapid transport system should be extended to run to Hendon Central Tube, using the existing lane widths of the A41, turning being achieved at The Burroughs. This would provide a link between the tube, Brent Cross and the new Cricklewood Station. Ideally, a branch should run to Brent Cross Station, although this would probably be impractical.

Suggest adding at the end of C7 (C): ' . . . To Brent Cross bus station and Hendon Central Northern Line Station'

Barnet council response

Agree.

Change document?

At the end of C7 (C) add " . . . to Brent Cross Bus Station and Hendon Central Northern Line Station."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

| | | | | | |
|------------------|--------|--|--|--|--|
| Object | Tobias | | | | |
| 353 /2047 | Hill | | | | |

Comment

Policy C7 states that permission for the development will not be granted unless the plan includes provision for both waste and freight transfer on the site. This is unnecessary, particularly as some waste transfer functions have moved out of the area. Barnet should not write itself into insisting for the stations to be part of the development, if developers are prepared to relocate them elsewhere.

Barnet council response

These uses need to be located here for operational reasons to meet the needs of north London, detailed plans will be considered at a later stage.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------------|-------------------|------------|-----------------|
| Object | Jean | Woolmead Avenue Residents Association | 1.18 | | |

285 /1987 Ivatt

Comment

As stated previously, public transport facilities are poor. Will the private companies which run the buses and trains be prepared to invest large sums to provide more buses and trains, as there has been a marked reluctance to do so up to now. With 20,000 residents and 14,500 workers there will need to be a comprehensive and efficient service to meet the requirements.

Barnet council response

The council will negotiate improved public transport as an essential part of the regeneration scheme.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Mason Richards Planning | | | |
| 354 /2052 | Fenwick | Castlemore Securities Ltd | | | |

Comment

Reference within paragraph 1.17 to the rapid transport system, is also subject to the same questions as that relating to the new bridge over the North Circular. Policy states that the RTS should be included in the new bridge, but in what way? What form will the rapid transport system take, is it to be a tram a bus, moving walkway? The plan should be seeking to provide more certainty or directing users of the plan to Supplementary Planning Guidance or policy statements, which explain the detail of how such provision will be provided.

When the plan refers to 'a new passenger station should be provided', it needs to be clear how it is to be provided, by whom, when and through what mechanism. The 'outline proposal' mechanism identified within the plan is not one, which will achieve these objectives.

Objection is specifically raised to policy C7 in the following terms.

The policy states that "Permission will not be granted unless ... However, it does not say what it will not grant permission for.

Given that the 'outline proposal' concept of the Additional Chapter is demonstrably flawed, and that the Council will need to rely upon a series of independent planning applications being made, is the policy suggesting that none of these applications should proceed until all of the objectives have been achieved? That may not be achieved for many years if not decades. As drafted, policy C7, if interpreted literally, will lead only to stagnation and a failure to deliver.

The policy might more helpfully be reworded to ensure that planning permission would not be granted unless financial contributions, related fairly and reasonably to the scale of the development to which they relate, have been made towards, some or all of the proposed objectives. Those contributions would then be held by the Council till such time as sufficient funding had been achieved to enable those schemes to be implemented.

The essence of Section 106 is that contributions can only be determined on a site-by-site basis, reflecting the merits of each individual scheme. It will be necessary of the Council, at an early stage, to obtain a detailed understanding of the implications of each of the objectives, and the likely costs arising there from, in order to be able to make sensible requests in respect of Section 106 contributions.

The Council will also need to consider carefully, whether it would be appropriate to phase the development of any permission granted until such time as some or all of the provisions are in place.

Barnet council response

See 187/2026 - details of linkages between both sides of the North Circular Road will be addressed by the Development Framework.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mide | Government Office for London | | | |
| 187 /2026 | Beaumont | | | | |

Comment

Policy C7 - The policy states that permission will not be granted unless all of the transport related measures listed in the policy are included through section 106 agreements. Whilst we assume from the content of the policy and supporting justification text that the reference to permission refers to the outline planning permission for the comprehensive redevelopment of the regeneration area, this is not made clear in the policy.

For clarity and the avoidance of doubt, the form of permission being referred to in the policy should be made clear. (See also our objection to policies C1 & C2)

Barnet council response

Agree. The control over these infrastructure will be guided by any Delivery Strategy in the Framework and tied down in Masterplans.

Change document?

Change the beginning of policy C7 to state ; "The Development Framework for the Regeneration Area will not be approved and/or Masterplans will not be granted by the council unless the following are provided"

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Marlene | | | | |
| 351 /2029 | Wardle | | | | |

Comment

Concerned that the new Thameslink station at Staples Corner may lead to reduction of the service to our local station at Cricklewood and seek reassurance that it will not.

Barnet council response

This will be a matter for the SRA, the Office of the Rail regulator and not for the UDP.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Robert | Freightliner Group | 1.19 | | |
| 364 /2180 | Goundry | | | | |

Comment

Development of freight terminal activity in the area needs to recognise the space requirements of effective rail operations and the fact that there needs to be some separation between them and residential or office development. Road access is crucial, and the Council should set up a Freight Quality Partnership with interested parties in the transport industry to establish the factors for consideration and the requirements of the freight industry.

Barnet council response

Consultation will be undertaken widely including with any future partnerships that may establish.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Howard | The Highways Agency | | | |
| 356 /2061 | Moore | | | | |

Comment

The Highways Agency is unable to enter into section 106 agreements with developers.

Policy C7 should be amended to read "Permission will not be granted unless all of the following measures are included through section 106 agreements or planning conditions:"

The criterion A should include a reference point in respect of the required highway improvements - for example improvement required such that the development would not have any detrimental effect on existing congestion levels.

Barnet council response

This is too much detail for the policy but conditions will be referred to.

Change document?

Add to policy C7 in 3rd line "conditions and/or S106 agreements."

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | P.J | Community Foods Ltd. | | | |
| 346 /2005 | Woodhams | | | | |
| Comment | | | | | |
| This project is a serious overdevelopment. Additional retail development requires Section 106 expenditure of vast amounts. This then requires 'additional floorspace being justified' to pay for new bridges etc. | | | | | |
| Barnet council response | | | | | |
| The scheme is intended to bring major benefits to the area in terms of jobs, training, public transport, leisure, community facilities and housing. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|--------------------------------------|-------------------|------------|-----------------|
| Object | David | West Hampstead Amenity and Transport | | | |
| 363 /2172 | Levene | | | | |
| Comment | | | | | |
| Whilst the proposed new station is to be welcomed, it should not be at the expense of the service to existing stations. | | | | | |
| Suggest addition at end of clause C: 'subject to agreement that the existing rail service to stations at Cricklewood, West Hampstead and Finchley Rd is maintained to at least the existing levels of frequency'. | | | | | |
| Barnet council response | | | | | |
| This will be assess in a Transport Impact Assessment at the Framework and/or Masterplan stages to be consulted upon in due course. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Robert | Freightliner Group | | | |
| 364 /2177 | Goundry | | | | |
| Comment | | | | | |
| If re-siting the waste transfer station is essential, consideration must be given to the prevailing wind direction as the available technology is not at the moment odourless. Locating it upwind of the prevailing south westerlies seems imprudent. | | | | | |
| Barnet council response | | | | | |
| This is too detailed a matter for the UDP. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Philippa | Freight on Rail | | | |
| 357 /2073 | Edmunds | | | | |
| Comment | | | | | |
| Policy C7 (E) Mentions retention or replacement of a viable freight transfer facility at Cricklewood but does not mention that is should retain rail freight transfer facilities. | | | | | |
| Barnet council response | | | | | |
| Agree. | | | | | |
| Change document? | | | | | |
| Insert "rail" after "viable". | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Catherine | | | | |
| 347 /2008 | Johnston | | | | |

Comment

I object to location of waste transfer station and a rail freight facility on the land between the Railway Terraces and Nth Circular Rd (triangular, cross-hatched site on plan). This is too near housing, and I believe the noise, pollution and extra traffic would adversely affect my life. I think the existing roads (chiefly A5) are inadequate to serve these facilities. I suggest removal of the waste transfer station and rail freight facility further north and closer to the North Circular (where the existing waste transfer station is located), and closer to the major road network (A406, A41, M1).

Barnet council response

This will be considered in a future Framework document and Masterplan applications that will be the subject of further consultation.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | | | |
| 180 /2253 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Should refer to a public transport alternative to a new train station, an improving of the image and appearance of Cricklewood and Hendon stations, including disabled access, and a public transport interchange south of the North Circular.

Barnet council response

Agree that links should be stated to the Brent Cross and Hendon underground stations, however a station is considered necessary to indicate the importance of such a level of accessibility.

Change document?

State as policy C7 (c) after "C) A new railway" add "and bus station" and after "at Cricklewood, linked by a rapid transport system to Brent Cross bus station" add "and Hendon Central Northern Line station"

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ray | North London Waste Authority | | | |
| 366 /2192 | Dodds | | | | |

Comment

The Authority understands through discussion with L.B.Barnet's officers, that was the point raised in objection 366/2190 to be accepted, the requirement would be reflected in a rewording of Policy C7 (E), to the effect that the facilities for diverting waste from landfill as well as transferring waste would then require Section 106 Agreements to be included before permission for any redevelopment were granted. Given the complexities of the freight transfer facility, the Authority therefore wishes that the Section 106 requirements relating to the waste facility and facility for diverting waste from landfill be made explicit and separated from other requirements within Policy C7.

Barnet council response

Agree

Change document?

See change 188/2146

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Donald | Camden (London Borough of) | | | |
| 367 /2204 | Chambers | | | | |

Comment

Camden supports improvements to the public transport network and measures to prioritise pedestrians and cyclists.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Donald | Camden (London Borough of) | | | |
| 367 /2207 | Chambers | | | | |

Comment

Although supporting the retention of rail freight facilities within the context of London's strategic needs, we are concerned that any intensification of freight transfer and also of the waste transfer station is likely to lead to an increase in the number of heavy lorries on roads in the vicinity with a knock-on impact to the Kilburn High Road further degrading the environment of an already poor quality shopping and service centre.

The requirement of a wider transport study should be included. This study should investigate the impact of an enlarged waste transfer station and increased capacity of the freight transfer depot, the impact of an additional station on West Hampstead and the plans for the West Hampstead Interchange and the impact of development on the wider road network (e.g. Kilburn High Road).

Barnet council response

A transport assessment will be undertaken so as to inform the masterplan application.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Donald | Camden (London Borough of) | | | |
| 367 /2209 | Chambers | | | | |

Comment

We are also concerned that a second station within the Cricklewood area would lead to a diminished service to West Hampstead and have a negative impact on plans for a West Hampstead interchange.

The requirement of a wider transport study should be included. This study should investigate the impact of an enlarged waste transfer station and increased capacity of the freight transfer depot, the impact of an additional station on West Hampstead and the plans for the West Hampstead Interchange and the impact of development on the wider road network (e.g. Kilburn High Road).

Barnet council response

This will be assess in a Transport Impact Assessment at the Framework and/or Masterplan stages to be consulted upon in due course.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Railfuture London Branch | | | |
| 368 /2333 | Dyall | Railfuture | | | |

Comment

By putting the waste transfer and freight stations in a constrained site then it nullifies both policies by giving insufficient room for both. Access would be from an insufficient section of the Edgware Road and encouragement given to using domestic roads in Brent with congestion significantly affecting the turn around time of waste collection vehicles.

This triangle would be better used by the Midland Main Line and Thameslink services whereas they are having to use the east side of the line to construct a maintenance facility.

Barnet council response

The UDP chapter does not specify areas within the employment land for these uses and these will be indicated in the Framework and/or Masterplan.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Sue | Barnet Friends of the Earth | | | |
| 286 /2078 | Bird | | | | |
| Comment | | | | | |

We question the need for any new bridge to carry cars since the development is aiming to reduce the use of the car. We recommend that the bridges be for pedestrians, bikes and buses, with cars using the existing road system.

Suggested replacement for C7, Point B:

'The new bridges for pedestrians, cyclists and buses (to include the RTS) only . . . '

Barnet council response

It is considered that the detail of the methods of linking the areas will be for the future policy and masterplans to detail. See change 287/2348

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | | | |
| 188 /2141 | Livingstone | | | | |
| Comment | | | | | |

The site is already a rail freight site and there is opportunity to expand this role further. It is essential that bodies involved in rail freight, notably the Strategic Rail Authority, are closely involved in developing this. The text fails to recognise the existing role and define an enhanced role for rail freight. Furthermore, the text also fails to recognise the importance of the area for sidings to accommodate rail passenger carriages. The site is important in this role and these facilities ought to be included within the text of land uses. Their absence could influence the ability to provide and enhance rail passenger services across a wide area.

Amend text to include reference to "expanding rail freight facilities in consultation with the Strategic Rail Authority, and the provision of appropriate rail sidings for passenger carriages."

Barnet council response

Agree.

Change document?

See change for new paragraph at 1.20a (81/2152) and change for policy C7 (81/2153)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | | | |
| 188 /2138 | Livingstone | | | | |
| Comment | | | | | |

The accessibility improvements and enhancements should include reference to facilities for disabled persons at pedestrian crossings and bus lay-bys.

This may be addressed by inserting the following wording: "Improvements at pedestrian crossings and bus lay-bys to facilitate use by disabled persons "within Policy C7 as a new point (G) or an integral part of point (F)

Barnet council response

Agree

Change document?

Add to policy C7 (F) as new point G after "Priority" ; "measures for access disabled persons, "

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Chris | Railtrack Plc | | | |

45 /2264 Price

Comment

The construction of a new station may have a significant impact on the existing Thameslink/Midland Main Line, which is already congested. In submitting proposals any applicant will need to determine the predicted level of demand of any new station and consider the impact on the present and proposed service for both passenger and freight. The applicant should further identify any infrastructure/operational improvements that may be required to manage the impact of any such proposals as part of cost/benefit analysis of the proposal. It is anticipated in bringing forward these proposals any applicant will work closely with the Strategic Rail Authority and Railtrack.

The policy should make reference to ensuring that any new station is operationally, technically and commercially viable. On operational grounds a full assessment of the benefits and disadvantages of the rail/transport proposals, with particular reference to the station and rail freight facility, should be submitted in support of any planning application.

Barnet council response

Agree. This detail will however be better located in the r.j.

Change document?

Add after 5th sentence of policy 1.17 "The operational, technical and commercial viability of the railway station will be considered in consultation with the SRA. "

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Martin | Scott Wilson | | | |
| 372 /2296 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

We support the provisions listed in Policy C7.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | | | |
| 372 /2297 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

Although supporting the provisions listed in Policy C7, in the case of West Hendon Regeneration we suggest it would only be appropriate for any Section 106 Agreement to refer to those improvements that are directly related, i.e; improvements to the road network, priority to pedestrians, buses and cyclists and improved access to West Hendon Station.

Barnet council response

Agree that the requirements of policy C7 refer to land mainly to the south of the North Circular but that benefits will also accrue to West Hendon.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|-----------------------------------|-------------------|------------|-----------------|
| Object | Eli | Railway Terraces Residents Assoc. | | | |
| 361 /2109 | Jones | | | | |

Comment

Both paragraph 1.17 and Policy C7 refer to a rapid transport system, which we now understand to be merely a dedicated bus lane. This is somewhat limiting. We would like to see reference to a fixed link, ie. tram, and to extending this link to nearby tubes and communities.

Barnet council response

The rapid transport system will be part of the masterplan application.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|------------------|---------------------------------|-------------------|------------|-----------------|
| Object | | Barnet (London Borough of) | | | |
| | 287 /2349 | Regeneration | | | |
| Comment | | | | | |
| Barnet council response | | | | | |
| Change document? | | | | | |
| Point A Change whole point from | | | | | |
| "Improvements to the road network that meet the requirements of Transport for London and the Highways Agency as appropriate;" to - | | | | | |
| "Connections and/or improvements to the strategic road network that are satisfactory to Transport for London in relation to the TLRN and the Highways Agency in relation to the M1." | | | | | |
| Point B Change whole point from | | | | | |
| "Two new vehicular bridges, one across the North Circular Road, and a second across the railway to Edgware Road;" to - | | | | | |
| "Sufficient transport links to and through the development. In particular, this should include at least one vehicular link across the North Circular Road and one vehicular link crossing the railway to Edgware Road." | | | | | |
| Point C Change whole point from; | | | | | |
| "A new railway station at Cricklewood, linked by a rapid transport system to Brent Cross bus station;" to - | | | | | |
| "A new railway station at Cricklewood integrated with facilities for other public transport services and key trip generating sites within the development by a rapid transport system. The integration should include the Edgware branch of the London Underground Northern Line." | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|------------------|---------------------------------|-------------------|------------|-----------------|
| Object | | Barnet (London Borough of) | | | |
| | 287 /2348 | Regeneration | | | |
| Comment | | | | | |
| Barnet council response | | | | | |
| Change document? | | | | | |
| It is considered that the method of linking the areas will be for future policy and masterplans to detail. | | | | | |
| Delete last sentence of para graph 1.17 that states; "The RTS will be included in the new bridge over the North Circular that will include tracks for cyclists, pedestrians, buses and cars." | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|------------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | | | |
| | 188 /2144 | Livingstone | | | |
| Comment | | | | | |
| To ensure that the facility meets the legislative requirements for waste, in the penultimate and last lines of sub-section E, insert full stop after "sub region" and delete remaining words. | | | | | |
| Barnet council response | | | | | |
| Agree | | | | | |
| Change document? | | | | | |
| See change 188/2144 | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Railfuture London Branch | 1.17 | 1.20 | |
| 368 /2283 | Dyall | Railfuture | | | |

Comment

About 25% of customers arrive at Brent Cross by bus, increasing the size of development, the number of bus routes and size of the bus station will not significantly change that percentage - optimistically 30%.

Given the local topography and road network, it is difficult to see how a dedicated bus route between Hendon Central and Brent Cross Tube Stations, will be quicker. Most areas served by the Northern Line Edgware Branch have fast , direct buses to Brent Cross.

Passengers leaving their cars and using the proposed new Thameslink Station, may be far more limited than implied by the council and developers. This is because the catchment area is linear and many of the towns on the line are large draws in themselves. It is unlikely that fast trains will stop at Brent Cross as there will not be sufficient business to upset the timetable.

Barnet council response

These will be matters of detail to be worked through in the Framework and/or Masterplans.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Chris | Railtrack Plc | | | |
| 45 /2263 | Price | | | | |

Comment

Railtrack supports the council's intention to direct planning obligations from Section 106 agreements to a new station at Cricklewood and the retention or replacement of a viable freight transfer facility.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Walter | Barnet Primary Care Trust | | | |
| 371 /2258 | Thompson | | | | |

Comment

Some forms of transport, such as cycling and walking, promote health directly by increased physical activity and reduction of obesity. For example, reallocation of road space to provide more infrastructure for pedestrian and cycle route networks is reported to have been effective in increasing the use of these modes and decreasing accidents. The Cricklewood, West Hendon and Brent Cross development makes proposals to support walking and cycling and these points should not become lost in the later detailed planning.

Barnet council response

That is for later stages of detail to be guided by.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Julian | Montagu Evans | | | |
| 360 /2317 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

Delete policy as it refers to a planning application and disperse all the requirements to the policies GCrick, C6 and C11.

Barnet council response

Disagree as this policy is required to cover transport issues. GCrick is a strategic policy, C6 relates to retail issues mainly and C11 is more generalistic dealing with all issues. The inclusion of all the transport issues in any of these policies would not assist in clarifying the council's intentions for improvements to transport in the area.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|-----------------------------------|-------------------|------------|-----------------|
| Object | Eli | Railway Terraces Residents Assoc. | | | |
| 361 /2122 | Jones | | | | |

Comment

Clause E states that permission will not be granted unless both waste and transfer stations are provided within the development. This is unnecessarily restrictive. We acknowledge the need for these facilities, but it is not essential they be provided in this particular location if alternative sites can be found. Could this clause be modified to make clear that although these facilities must be available, they do not have to be within the regeneration area.

Barnet council response

It is considered that new facilities will be required to meet the needs for waste transfer, recycling & rail freight in this part of London.

[Change document?](#)

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | James | Strategic Rail Authority | | | |
| 81 /2152 | Lough | | 1.17 | | |

Comment

Need to add paragraph to refer to the need to reserve land for passenger stabling and depot facilities.

Add new paragraph;

"The SRA advises that the railway lands at Cricklewood have an important role to play in the provision of passenger train stabling and depot facilities. This is in addition to the need for any rail freight facilities. Provision must therefore be made for these facilities in discussion with the Strategic Rail Authority."

Barnet council response

Agree

[Change document?](#)

Add new paragraph 1.20a;

"The SRA advises that the railway lands at Cricklewood have an important role to play in the provision of passenger train stabling and depot facilities. This is in addition to the need for any rail freight and waste transfer facilities. Provision must therefore be made for these facilities in discussion with the Strategic Rail Authority."

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | | | |
| 372 /2295 | Herbert | Metropolitan Housing Trust/ Lovell Construction | 1.17 | | |

Comment

In Para.1.17 we suggest there should be a reference to the very unsatisfactory way in which transport routes tend to cut through the area and sometimes isolate communities from their neighbours and from services which they could expect reasonably convenient access to.

Barnet council response

Agree

[Change document?](#)

Add to beginning of para 1.18 "The area is bounded and bisected by major transport routes which limit free movement into and across the area. It is essential that adequate facilities are provided to ensure that the requirements of Policy M1 in the Movement Chapter are met. "

and delete "It is also" in 2nd sentence, replace with "It is.."

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|------|-----------------------------|------------|------|----------|
| Support | Sue | Barnet Friends of the Earth | 1.17 | 1.19 | |
| 286 /2076 | Bird | | | | |

Comment

Support for the recognition of the potential value of this site for rail transport, not only for freight but for passenger transport too. We trust that links with Crossrail and Thameslink will be discussed.

Barnet council response

Support noted

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------|--------------------------|------------|-----|----------|
| Object | James | Strategic Rail Authority | 1.17 | | |
| 81 /2156 | Lough | | | | |

Comment

Add to paragraph reference to the SRA and that technical, operational and commercial requirements of the new station shall be met.

Barnet council response

Agree that the SRA should be referred to include the needs of users eg disabled parking, parking for operators and other necessary users.

[Change document?](#)

Add after " A new passenger station should be provided " ["to the satisfaction of the Strategic Rail Authority"]

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|-------------------------------|------------|-----|----------|
| Object | Mary | GVA Grimley | 1.17 | | |
| 180 /2250 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Should refer in fourth sentence of paragraph 1.17 to "a new passenger station or equivalent major public transport improvements."

Barnet council response

Disagree

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|------------------------------|------------|-----|----------|
| Support | Ray | North London Waste Authority | 1.17 | | |
| 366 /2189 | Dodds | | | | |

Comment

L.B.Barnet's incorporation of a commitment to the sustainable development of the rail link is welcomed by the Authority.

Barnet council response

Support noted

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | 1.17 | | |
| 180 /2248 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Need to refer to the road issues and that the communities in the are segregated by the roads and minor changes to wording.

Barnet council response

Agree on the point of roads severing the communities.

Change document?

See change 372/2295.

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Anita | Drivers Jonas | 1.17 | | |
| 369 /2237 | Young | Department of Health and Social Care - London | | | |

Comment

Although DoHSC supports the Council's aim of promoting the use of public transport we request that, for completeness, the paragraph be amended to read:

'A new passenger station should be provided that will promote a significant incentive for people working in the area or visiting shops or COMMUNITY, leisure and sports facilities to use public transport'.

Barnet council response

agree

Change document?

add "community" to 3rd sentence of para 1.17

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Anita | Drivers Jonas | 1.17 | | |
| 369 /2238 | Young | Department of Health and Social Care - London | | | |

Comment

The DoHSC supports the Council's aim of promoting the use of public transport.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|--------------|---------------------------------|-------------------|------------|-----------------|
| Object | | Barnet (London Borough of) | 1.17 | | |
| 287 /2347 | Regeneration | | | | |

Comment**Barnet council response**

It is important that the effects on the strategic road network are considered in the proposals.

Change document?

Add to 8th sentence of paragraph 1.17 after "examine the effects of development on the"..;
"surrounding road network, particularly including the North Circular Road and .." delete "existing"

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | P.J | Community Foods Ltd. | 1.17 | | |
| 346 /2006 | Woodhams | | | | |

Comment

A rapid transport link from existing Brent Cross tube station to existing Brent Cross shopping centre will not be viable.
The upper level roundabout between A406 and A41 will not be able to facilitate such a 'rapid' link.

Barnet council response

This is a detail to be considered as part of the Masterplan application.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.17 | | |

188 /2135 Livingstone

Comment

The reference to providing an interchange at the new Cricklewood Station should make explicit reference to the need for a new bus terminal facility at this location. This will be required for bus services from the north and east that would be extended from Brent Cross to serve the new rail lands development. Any 'track' identified for use by the RTS should be designed so that it could be used by conventional buses, thereby ensuring a high degree of bus priority. It would also ensure that the RTS infrastructure can be utilised should the RTS not proceed. Bus priority measures should also be included in other locations wherever possible.

Could have a reference to the document "Interchange best practice guidelines in respect of the new station and interchange" by TfL/Railtrack/ATOC/LUL. The development of any new RTS scheme can only be progressed in consultation with and approval by TfL.

Barnet council response

Agree and this is a matter of detail for implementation by the Framework and Masterplans. The concept of a bus station at Cricklewood is stated already in the r.j. See change to policy C7 (180/2253) for a second new bus station.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.17 | | |

188 /2136 Livingstone

Comment

The aspiration is that private cars will not utilise the new bridge.

In the last sentence insert "and" between "pedestrians" and "buses" and delete "and cars".

Barnet council response

See change 287/2348

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.17 | | |

188 /2137 Livingstone

Comment

Policy C8 (last point) conflicts with text (1.17) - Policy says no car parking for station (pick up and set down only), whilst text says long-term car parking in limited numbers. Support no car parking stance of Policy C8 rather than the limited long-term car parking in paragraph 1.17.

Sixth sentence in para 1.17 should be reworded to read: "Only pick up and set down car parking facilities will be allowed in order to prohibit commuter car parking."

Barnet council response

There will be a need for disabled parking, parking for operators and other necessary users.

Change document?

Adds to 6th sentence of para 1.17 after "limited numbers" ; "for disabled passengers and for operational purposes "

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|-----------------------------------|------------|-----|----------|
| Object | Eli | Railway Terraces Residents Assoc. | 1.18 | | |
| 361 /2116 | Jones | | | | |

Comment

The paragraph refers to improvements to local public transport which are largely related to increasing frequency and information. Whilst desirable, this will not have a significant impact on the speed and use unless significant measures are taken to improve the infrastructure. We would like this area of the chapter to refer to potential fixed link systems, ie. Trams, and to actual road improvements to increase bus and tram flow, ie. Separated bus lanes, bus priority traffic lights etc.

Barnet council response

These are details for the framework and masterplans to develop whilst the policies are framed to deliver such improvements if they are considered necessary. The policies refer to improving public transport accessibility (in M1 of the Movement chapter and C7 of this chapter).

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|--------------------------|------------|-----|----------|
| Object | Ken | Greater London Authority | 1.18 | | |
| 188 /2140 | Livingstone | | | | |

Comment

The second sentence seems to infer that the developer will decide upon the bus services that are to be improved. This needs to be amended to reflect TfL's role.

Barnet council response

The role of Transport of London in the provision of bus services needs to be acknowledged.

Change document?

Add to end of 3rd sentence of para 1.18 "in partnership with Transport for London and bus operators."

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|---------------------------------------|------------|-----|----------|
| Object | Jean | Woolmead Avenue Residents Association | 1.19 | | |
| 285 /1991 | Ivatt | | | | |

Comment

It is hoped that rail freight will be managed in a way that is sensitive to the surrounding area. Reclaimed Railtrack land is to be used for building and it would be unacceptable if residents had to endure trains running all through the day and night. We do not want an increase in nuclear material being freighted through the proposed regeneration area.

Barnet council response

The issue will be considered as part of the transport assessment undertaken to inform the masterplan application.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------------|--------------------------|------------|------|----------|
| Object | John Miller | | 1.19 | 1.20 | |
| 374 /2325 | Lesley Turner | | | | |

Comment

Reference should be made in the third sentence to vibration and light pollution. The Railway Terraces are more prone to vibration than modern construction.

These considerations should also be taken into account with the waste transfer station with in addition air pollution (PM10 and smells), pollution of water courses and siting away from likely concentration of pets because the likely use of vermin control through poison. These issues should have already been in the UDP.

Barnet council response

These issues can all be taken into account under policy C3 and specialist advice will be required to assess these impacts in future applications.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | James | Strategic Rail Authority | 1.19 | | |

81 /2154 Lough

Comment

Should add paragraphs to ensure that rail freight is dealt with properly and consultation with SRA is important (as this feeds into the consent that the Office of the Rail Regulator may give for the sale of any land)

Barnet council response

Agree

Change document?

Add to paragraph 1.19 after third sentence "The Strategic Rail Authority will be an important consultee to ensure rail freight facilities are developed satisfactorily."

| | Name | Organisation name/Client | Para start | end | Page no. |
|---------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Robert | Freightliner Group | 1.19 | | |

364 /2179 Goundry

Comment

Development of freight terminal activity in the area is strongly supported.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | 1.19 | | |

180 /2251 Power

Comment

Need to state that the site brings an opportunity to increase rail freight use

Barnet council response

agree

Change document?

Add "maintaining and increasing" rail freight to serve north London in place of "development" in first sentence of para 1.19

| | Name | Organisation name/Client | Para start | end | Page no. |
|---------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Chris | Railtrack Plc | 1.19 | | |

45 /2271 Price

Comment

Railtrack welcomes that reference to providing a railfreight facility.

Barnet council response

Support for a mixed use scheme is noted.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|-----------------------------------|-------------------|------------|-----------------|
| Object | Eli | Railway Terraces Residents Assoc. | 1.19 | 1.20 | |

361 /2119 Jones

Comment

The paragraph refers to the effect of rail freight facilities on the local environment. We feel a similar clause should be included for the waste transfer facility at 1.20. We would like these clauses expanded to require both facilities to be located so as to minimise the use of non-trunk roads.

Barnet council response

Agree

Change document?

Move last sentence of para 1.19 to end of para 1.20 and include reference to waste transfer station.

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Chris | Railtrack Plc | 1.19 | | |

45 /2272 Price

Comment

Although Railtrack welcomes that reference to providing a railfreight facility, it wishes to see greater support expressed. Currently the wording concentrates on mitigating against noise pollution and effect on residential environments. Railtrack appreciates the associated problems and will work to keep the negative externalities to a minimum.

However, reference should be made to the significant environmental benefits of railfreight. By removing lorries from the

road, the wider benefit in numerous other areas would be great and these benefits need to be weighed against any disturbance to the immediate vicinity.

Railtrack requests that, after the second sentence in para 1.19, the following text is inserted: "This freight facility will bring significant environmental benefits to the borough, London and beyond, by reducing the number of lorries on the road."

Barnet council response

Agree

Change document?

Add after the third sentence in para 1.19 "This freight facility will bring significant environmental benefits to the borough, London and beyond, by reducing the number of lorries on the road."

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.20 | | |

188 /2142 Livingstone

Comment

Need to state that the facility meets the legislative requirements for waste.

Barnet council response

Agree

Change document?

See change 188/2146 on policy C7

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Jessica | | 1.20 | | |

352 /2285 Howey

Comment

Paragraph 1.19 states that "any proposal need to demonstrate that the environment of residential areas is not affected adversely". Item 1.20 does not have this phrase and this should be included.

Barnet council response

Agree

Change document?

See change 361/2119

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Tobias | | 1.20 | | |

353 /2049 Hill

Comment

Paragraph should include the phrase ' . . .any proposal will need to demonstrate that the environment of residential areas is not affected adversely'.

Barnet council response

Agree

Change document?

See change under 361/2119

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|--------------------------|------------|-----|----------|
| Object | Marlene | | 1.20 | | |
| 351 /2023 | Wardle | | | | |

Comment

The paragraph 1.19 relating to the rail freight transfer facility states that "any proposal will need to demonstrate that the environment of residential areas is not affected adversely." However, the text relating to the waste transfer station, para 1.20, does not have a similar phrase and it should.

Barnet council response

Agree

Change document?

See change 361/2119

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|--------------------------|------------|-----|----------|
| Object | Robert | Freightliner Group | 1.20 | | |
| 364 /2181 | Goundry | | | | |

Comment

It should be noted that materials recycling facilities (para. 1.20) require significant space and cannot be incorporated into small corners of other activities; the size and layout of any proposed replacement waste transfer station needs to be approved by waste and rail operators as well as by people who understand the needs of a significant recycling activity (c.f. the recycling facility at Bow in East London).

Barnet council response

Agree

Change document?

See change under 188/2146 as change to policy C7 and r.j.

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|-------------------------------|------------|-----|----------|
| Object | Mary | GVA Grimley | 1.20 | | |
| 180 /2252 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

The last sentence of Paragraph 1.20 in relation to the provision of a materials recycling that would be a model for other sub-regional freight facilities should be deleted. The masterplan for the site will develop plans for the replacement waste transfer station and freight facility in discussions with the SRA, NLWA and freight operators, to ensure it reflects the operational needs of the area in accordance with the existing site constraints, particularly its close proximity to dense urban residential areas

Barnet council response

See change under 188/2146 as change to policy C7 and r.j.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|------------------------------|------------|-----|----------|
| Object | Ray | North London Waste Authority | 1.20 | | |
| 366 /2190 | Dodds | | | | |

Comment

The Authority would wish to see the wording of section 1.20 strengthened to require the inclusion of facilities to divert significant amounts of waste from landfill for recovery, recycling or composting (rather than specifying a materials recycling facility or other specific facility at this stage) with a site of at least the same size as the current facility. Such a facility will be key to the Authority and L.B.Barnet's ability to meet future statutory recycling and composting targets and to contributing to the achievement of requirements of the EC Landfill Directive.

Barnet council response

See change under 188/2146

Change document?

C8 - Transport

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|--------|--------------------------|------------|-----|----------|
| Support | Howard | The Highways Agency | | | |
| 356 /2064 | Moore | | | | |

Comment

In general terms we support the parking strategy as identified in Policy C8 and the underlying concept of restricting car and hgv parking to control the overall level of traffic generated by the proposed development. The alternative in our view would be the need to provide inappropriate extra highway infrastructure. We welcome in particular the substantial reduction in the number of parking spaces that would result compared with an earlier planning application for development at the Cricklewood site.

Barnet council response

Support noted

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|----------|----------------------------|------------|-----|----------|
| Object | Donald | Camden (London Borough of) | | | |
| 367 /2211 | Chambers | | | | |

Comment

The parking provisions for residential and business uses are too generous for what is going to be a high density redevelopment with a high level of public transport accessibility. The policy fails to mention car free or car capped housing. There is a passing reference in paragraph 1.21 but it is too vague to be successful.

The policy should include a percentage of car free housing and recognise that in a high density development with a high level of public transport connectivity there is scope for a reduced level of parking. Parking standards for businesses should be reduced and a standard for provision of cycle facilities should be included.

Barnet council response

This will be addressed via the masterplan application.

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|--------|--------------------------|------------|-----|----------|
| Object | Howard | The Highways Agency | | | |
| 356 /2065 | Moore | | | | |

Comment

Although we support the parking strategy as identified in Policy C8, we believe there are areas where further clarification is required or where we believe very tight parking standards should be applied to discourage a significant increase in traffic in an area already subject to congestion.

Barnet council response

This will be addressed through the masterplan application.

[Change document?](#)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|--------------|----------------------------|------------|-----|----------|
| Object | Howard | Barnet (London Borough of) | | | |
| 287 /2350 | Regeneration | | | | |

Comment

Barnet council response

It is considered that, after viewing the draft London Plan, parking standards for hotels on arterial roads can be set up to 1 space per 1 bedroom, however in this case relaxed from 1 for every 4 to 1 for every 2 bedrooms.

[Change document?](#)

Change parking standard from 1 per 2 bedrooms to 1 per 4 bedrooms

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Howard | The Highways Agency | | | |
| 356 /2066 | Moore | | | | |
| Comment | | | | | |
| Parking standards for residential development: | | | | | |
| Support the proposal that a maximum of one parking space per unit is provided. | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Donald | Camden (London Borough of) | | | |
| 367 /2210 | Chambers | | | | |
| Comment | | | | | |
| We support no further car parking within an expanded Brent Cross . | | | | | |
| Barnet council response | | | | | |
| Support noted | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | P.J | Community Foods Ltd. | | | |
| 346 /2007 | Woodhams | | | | |
| Comment | | | | | |
| The increased retail development envisaged will lead to greatly increased traffic. Proposed car-parking will be inadequate. Typical hotel room occupants in north London arrive by car, so the proposed car-parking for hotels will be inadequate. | | | | | |
| Barnet council response | | | | | |
| People visiting hotels at Brent Cross will have a choice of means of transport. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Mason Richards Planning | | | |
| 354 /2053 | Fenwick | Castlemore Securities Ltd | | | |
| Comment | | | | | |
| Policy C8 suggests that there should be no further car parking within Brent Cross. Again, this should be clarified as to whether it means the 'new Brent Cross town centre area' as defined. If this is the case, then, whilst a prohibition on new car parking at the existing Brent Cross shopping centre may be an appropriate policy stance, if the Council are to achieve regeneration of areas to the south of the A406, there may well be a need to allow for some additional car parking in conjunction with new retail development in order to achieve the overall objectives of the town centre. It is unlikely that any new retail development could commence if there is a complete prohibition on car parking related to it. This is not to say that car parking could or indeed should not be implemented at substantially reduced levels from that historically provided for, but there must be some flexibility and acknowledgement within the policy of the need for limited additional retail car parking. | | | | | |
| Moreover, the policy does not address how car parking would be related to the range of town centre uses, such as leisure, restaurant and other uses, which the Additional Chapter encourages to locate within the new town centre. | | | | | |
| Barnet council response | | | | | |
| See 359/2093 and 180/2260 | | | | | |
| The mix of uses in the town centre will mean that car parking can be shared during the day, evenings and weekends. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Barry | Robert Turley Associates | | | |
| 168 /2213 | Cansfield | Sainsbury's Supermarkets Ltd | | | |

Comment

The parking standards set out in Policy C8 for retail development within town centres exceeds the recommended standards set out in PPG13 Annex E. The latter recommends 1 space per 14 sq m. for food retail and 1 space per 20 sq m. for non-food. The proposed Barnet standard of 1 space per 50 sq m. is unnecessarily restrictive and will have a detrimental impact on inward investment in these centres.

We recommend that the standards set out in PPG13 are adopted for all uses in these centres.

Barnet council response

The mix of uses in the town centre will mean that car parking can be shared during the day, evenings and weekends. These national standards quoted by the objector apply as maxima, whereas this location is very urban and will be made more accessible by public transport to justify the limit on parking spaces.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Howard | The Highways Agency | | | |
| 356 /2083 | Moore | | | | |

Comment

Parking standards for residential development:

Although the Agency supports the proposed standard of one space per unit, the plan should make it clear whether this is absolute or whether a greater provision may be made for some dwellings as an offset for the savings made in respect of the high density units which will be provided with little or no parking provision.

Barnet council response

Para 1.21 states that some housing could be car-free. The standard will be applied so that an average of one space per unit will be permitted.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Twiggy | Metropolitan Police | | | 8 |
| 349 /2016 | Shrub | | | | |

Comment

The maximum car parking standards should include Secure Car Parks Scheme (SCPS) for retail customer parking for increased safety and security.

Barnet council response

This issues is too detailed for the chapter to deal with.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------------|-------------------|------------|-----------------|
| Object | Jean | Woolmead Avenue Residents Association | | | |
| 285 /1981 | Ivatt | | | | |

Comment

Existing transport facilities are poor and some of the proposed improved facilities are welcome. However, the planners are not living in the real world if they think residents, shoppers and commuters are going to use public transport in large numbers. Convenience and high fares will always be a major factor in using a car and to deter this you will need to reduce fares, (a family of four can travel as cheaply as one in a car) and impose parking charges for everyone except residents. We already have major problems in the area and most roads have CPZs. To construct a new station with parking is good, but vehicles would still have to negotiate Staples Corner.

Barnet council response

The public transport will be improved so as to give people a choice.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Howard | The Highways Agency | | | |
| 356 /2084 | Moore | | | | |

Comment

Parking standards for business uses:

The Agency objects to this aspect of Policy C8 since it does not distinguish between the various business use classes and we would suggest it is too lax. We consider that two levels should be specified – 1 space per 300m2 in respect of B1 and B2 uses and 1 space per 500m2 including HGVs in respect of B8 use.

Barnet council response

The change will be made to bring the standards in line with the London Plan.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Howard | The Highways Agency | | | |
| 356 /2085 | Moore | | | | |

Comment

Parking standards for retail:

The Agency objects to this part of policy C8. We support the concept of "no further car parking" but consider the policy should make it clear that this applies to the whole of the "new town centre" and not just to Brent Cross.

Barnet council response

Agree

Change document?

The policy on no further parking will extend to leisure and relate to the town centre. See change 180/2260.

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Howard | The Highways Agency | | | |
| 356 /2086 | Moore | | | | |

Comment

The Agency objects to the omission from policy C8 of parking standards in relation to leisure. We would recommend that the policy states that no additional parking is provided to cater specifically for leisure use, relying instead on the existing off-street parking at Brent Cross and out of hours shared use with the additional parking that will result from the business development. Allowing parking at leisure developments would of course increase the overall level of parking in the area and may as a result increase the number of vehicle trips on the surrounding road network.

Barnet council response

Agree

Change document?

See change 180/2260

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Rodney | | | | |
| 343 /1974 | Fenlon | | | | |

Comment

We do not need another retail development in Cricklewood like Staples Corner and Friern Barnet (retail sheds). We do need sports, leisure and entertainment facilities which the people who work and live in the area can use: arcades, bowling alley, cinema multiplex, restaurant, cafes etc. We do not need more office space. We need to regenerate the local town centre.

Barnet council response

The regeneration scheme aims to create a town centre that will contain a mix of use including leisure, offices, shops and homes.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | | Peacock & Smith | | | |
| 359 /2093 | | WM Morrison Supermarkets PLC | | | |

Comment

The retail parking standard for West Hendon and Cricklewood town centres is one space per 50 sq.m with no further parking at Brent Cross. The maximum nationally is 1 per 14 sq.m. (from PPG13).

There should be an exemption for food development at 1 per 14 sq.m. in all three town centres as it is a well established that people do their shopping in bulk weekly needing access to parking areas.

Barnet council response

The mix of uses in the town centre will mean that car parking can be shared during the day, evenings and weekends.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Robert | Freightliner Group | | | |
| 364 /2182 | Goundry | | | | |

Comment

The impact of policy C 8 (parking) on vehicles displaced to locations such as freight access roads must be considered.

Barnet council response

This will be addressed through a transport assessment in relation to the masterplan application.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Chris | Railtrack Plc | | | |
| 45 /2269 | Price | | | | |

Comment

The policy also seeks to limit station parking to pick up and set down only. This is inappropriate, as it does not cater for the disabled or essential staff.

Railtrack requests that Policy C8 is reworded, to state that in addition to a pick up and set down facility, parking for the disabled and essential staff should be provided.

Barnet council response

Agree

Change document?

Adds to 6th sentence of para 1.17 after "limited numbers" ; "for disabled passengers and for operational purposes "

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Chris | Railtrack Plc | | | |
| 45 /2267 | Price | | | | |

Comment

The proposed parking standards for business uses are quite restrictive. The council should recognise that for a commercial scheme to be viable car parking provision is still important element in new developments. If the strict parking policies are imposed, there is a possibility that the development will not proceed on the grounds of commercial viability and marketability. It is important to balance the encouragement of new investment with the management of traffic congestion, as referred to in para 56 of PPG13.

There is a danger that by overly restricting parking in areas around public transport nodes, it will have a contrary effect to the aims of general Government policy to develop in central areas, as noted in para 51 of PPG13.

It would therefore be preferable for the council to revise the policy in a way which would discourage people from using cars but at the same time does not deny them the choice to use their cars. The policy should seek to ensure that development can be accessed by all appropriate modes of transport but encourage Travel Plans and consider mechanisms for use of private car parks, to make clear that the car is not the dominant mode.

Barnet council response

The detail of parking provision of parking provision will be developed in the Masterplans. However it is important to set aspirations for the area as the availability of parking can compromise the commercial viability of public transport provided as well.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Marlene | | | | |
| 351 /2028 | Wardle | | | | |

Comment

Concerned about the construction of a new Thameslink station at Staples Corner. Are there plans for Park and Ride? This seems a golden opportunity for Barnet to take a lead in easing congestion and pollution levels in London.

Barnet council response

There is no proposal for a park and ride currently.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | | | |
| 180 /2260 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Change last part of policy C8 to state

"Cricklewood railway station (existing and new) pick up and set down, appropriate disabled, operational and public car parking to be determined in liaison with the SRA and other regulatory bodies."

and requires clarification on whether the no extra parking requirement applies to uses other than retail to be developed at Brent Cross and whether the GLA's parking standards relating to accessibility prevail or not.

Barnet council response

Agree. The parking standards under policy C8 are Barnet's interpretation of the GLA policies on parking. The restriction on retail is to be extended to leisure uses because of the ability of parking to be shared between the uses as they have different peak period of use.

Change document?

Add after "retail"; "and leisure" and after "Brent Cross" ; "town centre as defined on the proposals map."

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

Object Sue
286 /2081 Bird

Barnet Friends of the Earth

Comment

To allow 1 car parking space per unit is incompatible with the policy to reduce traffic. Much of this development , with the improved public transport links should offer car free homes (as discussed in draft 1.21). Non-car ownership should be encouraged and linked to incentives, e.g. leisure facility discounts, car-pool partnerships.

Suggest revision of the housing requirement from 1 space per unit to deter car-use.

Barnet council response

One car space per unit will be the average, some developments will be car free. Adding any more specific details is not appropriate for the UDP.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

Object Julian
360 /2318 Stephenson

Montagu Evans
Hammerson UK Properties / Standard Life

Comment

Delete policy C8 as it is a departure from the policies contained in the existing parking standards section of the UDP.

Barnet council response

The chapter and this policy seeks to range of parking standards specifically to this area which will increase its public transport accessibility in the future.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

Object Martin
372 /2298 Herbert

Scott Wilson
Metropolitan Housing Trust/ Lovell Construction

Comment

Clearly, parking levels should reflect the accessibility of a location by public transport, but the figures given in Policy C8 could be viewed with greater flexibility where mixed uses are provided and there is the potential for spaces to serve a dual-purpose where there is little or no overlap between patterns of use. Additionally, the parking standard for housing should be seen as an average. The standard should be applied flexibly and allow for variations in housing type and provision, particularly in large developments.

Barnet council response

Agree, this policy applies over an area and there is room for flexibility

Change document?

See change 180/2260

C9 - Housing & Community Development

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
|--|-------------|---------------------------------|-------------------|------------|-----------------|

Object Jean
285 /1986 Ivatt

Woolmead Avenue Residents Association

Comment

Both the West Hendon and Cricklewood developments do not meet mayor Livingstone's proposal 50% = 35% social housing and 15% affordable housing. The schemes have little chance of approval unless the benchmark is met , you need to work with the GLA and the Mayor's London Plan and it doesn't give a chance for the next generation to get on to the home-ownership ladder.

Barnet council response

The council will consider the appropriate level of affordable housing, taking account of the council's UDP Policy H5.

Change document?

See change 188/2147

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Anita | Drivers Jonas | | | |
| 369 /2240 | Young | Department of Health and Social Care - London | | | |

Comment

The DoHSC also supports the requirement for developers to provide, through planning obligations, health clinics as part of larger residential developments in paragraph 1.21.

At present the NHS often suffers an unbalanced impact from legal agreements. For example, in securing planning permission for hospital health care development and the re-use of surplus sites, the NHS has often been required to contribute towards the provision of transport infrastructure, affordable housing, education facilities and public open space. However, it is less likely that contributions are sought for healthcare provision to meet a need generated by a new development. The UDP's acknowledgement in last sentence of paragraph 1.21 is therefore welcomed.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Mary | GVA Grimley | | | |
| 180 /2261 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Support

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Walter | Barnet Primary Care Trust | | | |
| 371 /2256 | Thompson | | | | |

Comment

It is also important that the whole area is designed in ways that encourage people to meet and socialise. Strong community provides a powerful support in coping with the stress etc.

Barnet council response

The mix of uses will be a starting point for Masterplans to detail.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | | | |
| 188 /2147 | Livingstone | | | | |

Comment

Cricklewood, West Hendon and Brent Cross Regeneration Area is strategically important in terms of housing. The proposed revised chapter to the UDP sets out the Council's broad planning requirements for new residential development. The Mayor supports the recognition that this major site will contribute to both local and regional housing needs. However, he is of the view that the site could make a bigger contribution to housing provision than the proposed 4,000 dwelling figure and that a more appropriate figure is at least 5,000. The Mayor would also expect that the housing provision figure will be included in the Proposals Map Schedule.

Increase the housing provision figure to at least 5,000 dwellings. Indicate that the housing provision figure will be included in the Proposals Map Schedule.

Barnet council response

Agree.

Change document?

Change policy C9 to state "5,000 homes" in the 2nd line and that the date runs to "2016" rather than "2013" to match the GLA's housing targets.

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Walter | Barnet Primary Care Trust | | | |
| 371 /2249 | Thompson | | | | |

Comment

Social, economic and environmental conditions have a major impact on health. There is substantial evidence that neighbourhoods can benefit from a mix of housing tenures, employment status, household composition and age groups.

These factors need to be borne in mind when determining which sort of houses should be built in Cricklewood, West Hendon and Brent Cross and where. These decisions will have direct and indirect impact effect on social integration and, therefore, on people's health.

It is desirable that new houses built within the proposed regeneration area should be affordable for a mixture of people in terms of age, income and family size. It is also important groups of houses are designed to encourage socialisation, particularly for new residents.

Barnet council response

These issues are acknowledged by the council and details will be considered in the masterplan application.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Donald | Camden (London Borough of) | | | |
| 367 /2212 | Chambers | | | | |

Comment

Support the provision of additional affordable housing.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Walter | Barnet Primary Care Trust | | | |
| 371 /2245 | Thompson | | | | |

Comment

One of the biggest problems facing Barnet in terms of health care provision is the inadequacy of current health care premises and the great difficulty in both developing the current ones and building new ones.

It is therefore crucial that ALL new developments that include housing, i.e. where the local population will expand, include a requirement for the developers to include buildings for local health care delivery, including general medical practitioners, general dental practitioners, optometry practices and community pharmacies. As a rule of thumb, one new general medical practitioner will be needed for every additional 1,800 residents.

Barnet council response

The need for health care facilities is recognised by the council. The issue will be the subject of examination through the masterplan applications.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Anita | Drivers Jonas | | | |
| 369 /2239 | Young | Department of Health and Social Care - London | | | |

Comment

The DoHSC supports the Council's requirement for new housing developments to include an element of affordable, key worker housing. The lack of affordable housing for key workers is a serious problem across the capital and impacts on the ability of the NHS, for example, to recruit and retain staff and, ultimately, run these essential services.

We therefore welcome the UDP's acknowledgement of this need in policy C9 and paragraph 1.21.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Delle | Brent (London Borough of) | | | |
| 102 /2000 | Odeleye | | | | |
| Comment | | | | | |
| No indication is given of the level of affordable housing being sought. The policy should require 50%, which would accord with the Mayor's Draft Plan. | | | | | |
| Barnet council response | | | | | |
| Agree | | | | | |
| Change document? | | | | | |
| See change 367/2214 | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Railfuture London Branch | | | |
| 368 /2334 | Dyall | Railfuture | | | |
| Comment | | | | | |
| The area occupied by the old locomotive yards would be ideal for low cost housing with access to Cricklewood station. | | | | | |
| Barnet council response | | | | | |
| This is a detail for Masterplans. | | | | | |
| Change document? | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|--|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Donald | Camden (London Borough of) | | | |
| 367 /2215 | Chambers | | | | |
| Comment | | | | | |
| The policy sets a minimum of 4 000 residential units while the Draft London Plan indicates that 5 000 residential units could be accommodated within the area. | | | | | |
| Barnet council response | | | | | |
| The chapter will be made consistent with the London Plan. | | | | | |
| Change document? | | | | | |
| See change 188/2147 | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|---|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Donald | Camden (London Borough of) | | | |
| 367 /2214 | Chambers | | | | |
| Comment | | | | | |
| The policy should set a minimum affordable requirement, preferably the 50% target set in the draft London Plan. The policy makes no mention of car free housing or the potential for car capped housing, and the reference within the supporting text to reducing car parking provision is vague and lacks authority. | | | | | |
| It should be clearly stated within the policy that 50 percent of housing provided is to be affordable. The policy should also set a target for car free and car capped housing. | | | | | |
| Barnet council response | | | | | |
| Reference will be made to the affordable housing requirements of the council. A degree of flexibility is required for car free housing and an average of 1 per home is recommended. | | | | | |
| Change document? | | | | | |
| Add at end of 4th sentence of para 1.21 " (see policy H5 of the Housing Chapter)" | | | | | |

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Julian | Montagu Evans | 1.21 | | |
| 360 /2319 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

The number of homes shouldn't be as prescriptive as it not known how much land will be needed for the other uses (waste, etc) affecting this number. Need to ensure that housing will need to make provision for infrastructure. State" the provision of 4,000 housing units between 2003 and 2013 will be considered in the preparation of the planning policy framework. It is anticipated that a mix of ..." and to replace criterion C); "In granting planning permission, in the S106 agreement, the council will seek to ensure that the development makes necessary contributions consistent with the nature and scale of development proposed."

Barnet council response

Agree that the framework will need to inform the allocation of land to the various competing land uses however an aspirational target is needed for the area because of the strong need for housing in London.

Change document?

Add to para 1.21 after 2nd sentence "The provision of a minimum of 5,000 homes will be required up to 2016, not including proposals for West Hendon. The Development Framework will guide form of uses over the Cricklewood/Brent Cross area. "

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | | | |
| 188 /2148 | Livingstone | | | | |

Comment

It is acknowledged that more detail could follow later in a planning brief and the GLA would encourage the Council to consider preparing one. Without being overly prescriptive, it would be useful for the chapter to include some further site specific detail, such as housing density, the levels of affordable housing, wheelchair housing and Lifetime homes. These may be based on relevant policies elsewhere in the Plan, but in the interests of good planning, it would be helpful to include the areas specific requirements within this chapter, as has been done with residential car parking standards.

Add the area specific requirements for housing density, proportion of affordable housing, wheelchair housing and Lifetime homes and cross- reference to the relevant policies elsewhere in the UDP.

Barnet council response

Agree

Change document?

Add after 6th sentence of para 1.21 "The council will develop SPG on site specific details relating to housing and mixed use development so as to provide guidance and information to developers and residents."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | | | |
| 372 /2301 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

In Policy C9, we recommend that the figure is increased to 5000 units up to 2016 and that this figure is regarded very much as a minimum guide in recognition of the status as an Opportunity Area and high public transport accessibility.

Barnet council response

Agree

Change document?

See change 188/2147

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | | | |
| 372 /2299 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

Although MHT/ Lovell supports the sentiments expressed in para. 1.21 and notes that a proportion of affordable housing is to be negotiated, the precise proportion should be agreed in the light of other development costs, and should not be of such an order as to act as a disincentive to investment.

For clarification, Policy C9 perhaps ought to read:

"A mix of housing will be required in order to meet the needs of the borough and neighbouring boroughs and shall include provision for" At present it possibly suggests there is no requirement for market housing.

Barnet council response

Agree, however the details covering this issue are contained in the UDP Housing chapter.

Change document?

See change 188/2147

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.21 | | |
| 188 /2150 | Livingstone | | | | |

Comment

Could be more positive by encouraging a new urban quarter including minimum densities along Sustainable Residential Quality and Urban Renaissance principles.

Barnet council response

The council will consider this issue as part of the Framework and Masterplan application.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Martin | Scott Wilson | 1.21 | | |
| 372 /2300 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

MHT/ Lovell supports the sentiments expressed in para. 1.21 and notes that a proportion of affordable housing is to be negotiated.

Barnet council response

Support noted

Change document?

C10 - Employment

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|------------|---|------------|-----|----------|
| Object | Julian | Montagu Evans | 1.22 | | |
| 360 /2320 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

By stating that permission will be granted makes no reference to other material considerations when a framework is the best option.

Change policy to state

"In assessing proposals for floorspace falling under Class B1 (business), Class B2 (industrial) and Class B8 (warehouses), the council will require:-

1. The replacement of waste transfer and material recycling facilities;
2. The inclusion of a freight transfer facility; and
3. Demonstration that cumulatively with other proposed uses there will be no conflict with the movement policies of the Plan.

In granting planning permission, the Council will require that the infrastructure associated with the development will be provided by means of a S106 agreement, consistent with the nature and scale of the development proposed.

Barnet council response

Agree on the point regarding the structure of the policy.

Change document?

Delete the first 10 words of the policy to start at "Within" and to add after "proposals map" ; "the council will require the provision of : "

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------|--------------------------|------------|-----|----------|
| Object | Carol | The Finchley Society | | | |
| 263 /2163 | Halls | | | | |

Comment

Would like to see an additional sub-clause added specifically to indicate the enhanced role that B2 uses should play in the regeneration scheme.

Barnet council response

Agree.

Change document?

Add "B2 use" before "industry" in the 3rd sentence from the end of para 1.22

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|--------------------------|------------|-----|----------|
| Object | Holly | TPC Ltd | | | |
| 327 /2040 | Hanbury | Costco Wholesale UK Ltd | | | |

Comment

This policy should be consistent with the agreed wording in the employment chapter to encourage in point B), in addition to warehouse uses;

"warehouse uses (class B8) and similar uses defined as those uses not falling within any use class, such as, warehouse clubs (that do not share many characteristics of a retail outlet), cash and carry businesses, builders merchants, haulage yards, bus garages and MOT testing stations."

Barnet council response

The UDP addresses this issue and does not need to be repeated here.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|---------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Carol | The Finchley Society | 1.22 | | |

263 /2161 Halls

Comment

Support the general concepts in most of the policies and r.j, but particularly applaud the mixed-uses, especially freight transfer and industrial uses. We consider that too much of our industrial infrastructure has been laid to waste, and it is important that this vital component of the economy, and of local employment, is actively encouraged.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Delle | Brent (London Borough of) | | | |

102 /2011 Odeleye

Comment

We support the encouragement of employment (B1, B2, B8) and freight & waste facilities in this area, but concerned that the re-location of the existing waste transfer/management facilities to designated employment are would result in alternative access off Edgware Road, rather than currently directly off the North Circular Road. There is a danger that this would result in impact from vehicle movements on residential areas to the west of Edgware Road.

Barnet council response

Details of the location of different land uses including the waste transfer and waste management facility and access arrangements will be addressed in the masterplan application.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------------|-------------------|------------|-----------------|
| Object | Jean | Woolmead Avenue Residents Association | | | |

285 /1982 Ivatt

Comment

Unemployment in Barnet is low. Mayor Livingstone is on record as saying that less prosperous areas in London will take advantage of the 14,500 jobs on offer. How are these people going to get to work? not by car we hope. Again parking charges would be a deterrent.

Barnet council response

People will have a choice of means of transport to gain access to new jobs.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Barbara | | | | |

373 /2310 Williams

Comment

The council should not commit to having a freight/waste transfer station on the site in case there is more suitable location for it. There should be a 100metres distance from the Railway cottages and any heavy industrial buildings.

Barnet council response

This is a detail for the masterplan.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | | | |
| 180 /2277 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Although agreeing that freight, waste transfer, B2 and B8 should be restricted to parts of the site there could be B1 uses at Brent Cross as well.

Add "handling" after "freight" and "waste". Add "rail" before "freight" as it relates to the transfer between road and rail.

Change policy C10 to state after first sentence "map as employment and Rail Related uses;"

Barnet council response

Agree however rail and freight transfer facilities are the chosen term in the chapter. The Proposals Map does not need to be so specific as there is a need for clarification as to how the rail related uses will be laid out on the site and flexibility given to the Development Framework and Masterplans.

Change document?

Add after "map" in 4th line of policy C10 "as employment and mixed-use land"

Add "rail" before "freight" in point A)

Add as a penultimate sentence "Office development (use class B1a) will also be permitted in the mixed-use town centre and an urban office quarter."

Add "West Hendon and Brent Cross" to end of 5th sentence.

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Chris | Railtrack Plc | | | |
| 45 /2274 | Price | | | | |

Comment

Railtrack supports the principle of this policy, identifying a freight transfer facility, business and industrial uses and waste facilities as appropriate on the employment and mixed-use land within the regeneration as defined on the proposals map.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Marlene | | | | |
| 351 /2018 | Wardle | | | | |

Comment

Concerned about the proposed plans for the area. Believes that it is not right to place a waste transfer and freight transfer facility so near the residential area. Further more, the Edgware Road is one of the most congested in London. To add to this congestion is madness and disregards completely the needs of the people who already use this route.

Barnet council response

The detail of the location and access issues for these facilities will be for masterplans and the framework documents in the future.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | | Wimbourne Martin French Ltd | | | |
| 358 /2079 | | | | | |

Comment

Should consider the health impact of fumes from traffic on office workers.

Will support new waste transfer station if it is "green"

Barnet council response

This is a detail for any planning application.

The targets for recycling will encourage recycling to be provided at the new waste transfer centre and this detail is an operational matter for the waste regulator.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Sue | Barnet Friends of the Earth | | | |
| 286 /2088 | Bird | | | | |
| Comment | | | | | |

The potential for job opportunities created around the recycling industry has not been clearly stated. It is a logical step to locate recycling businesses next to sites where collection and sorting takes place, in particular, to utilise the rail and retail facility in this area.

Suggested amendment to Point C: 'waste transfer materials sorting and production and sale of recycled goods'.

Barnet council response

Agree

Change document?

The detail of the components of the recycling facility is for the masterplan to decide. The policy will not preclude this use.

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | | | |
| 372 /2302 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |
| Comment | | | | | |

It is too restrictive to see potential for employment development only in relation to a defined area on the Proposals Map, as envisaged in Policy C10. This approach does not reflect current mixed use philosophy and the potential there may be for commercial development in other areas well-served by public transport.

Barnet council response

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Howard | The Highways Agency | | | |
| 356 /2087 | Moore | | | | |
| Comment | | | | | |

Policy C10 is insufficiently specific as to the level of development that will be allowed. We assume your authority has carried out infrastructure capacity assessments as suggested by paragraph 6.14 of PPG12 and the maxima identified by these assessments should be incorporated into the draft policy as upper limits on development. Our main concern is that upper limits are set for B1, B2 and B8 uses although for consistency an upper limit should be set for the hotel development as well. Bearing in mind that the Mayor's draft spatial strategy would appear to support the development of "tall buildings" it is essential that upper limits are set at the outset and not decided by outline planning proposals. We would suggest that the limits for B1 and hotel development should be as in the 2001 planning application with an upper limit of say 100,000m2 for B2+B8.

Barnet council response

There is a minimum level of 5,000 new jobs proposed, as amended, and the level of capacity will rely on a number of infrastructural decisions worked through in future plans for the area.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Donald | Camden (London Borough of) | | | |

367 /2216 Chambers

Comment

We have reservations (iterated in our response to policy C7) regarding the freight and waste transfer facilities. The provision of significant additional employment floorspace is consistent with the Draft London Plan and could potentially provide employment benefits for Camden residents. We do have concerns about the impact on traffic in the area especially as the proposed level of parking is generous for an area that has relatively good public transport access. Improvements to the local public transport network should be implemented before development of employment floorspace takes place.

For the purposes of consistency the Draft London Plan figures should be included.

Barnet council response

This detail of the transport impacts will be dealt with in the Masterplans.

Reference to the jobs target in the London Plan will be made.

Change document?

Add to end of paragraph 1.22 "The reasoned justification to Policy C6 gives a guideline of 5,000 jobs to be created in the new town centre."

| | Name | Organisation name/Client | Para start | end | Page no. |
|---------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Delle | Brent (London Borough of) | | | |

102 /2001 Odeleye

Comment

We support the encouragement of employment (B1, B2, B8) and freight & waste facilities in this area.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Chris | Railtrack Plc | | | |

45 /2275 Price

Comment

Railtrack confirms that strategic nature of the Cricklewood sidings lands in term of the Rail Network, in line with 1.17, and that there are operational uses that may need to be located there during ht plan period. Current known requirements are for rolling stock maintenance depots for Thameslink and Midland Main Line companies. Given the site's strategic location there may well be other requirements.

Any application for the site will need to demonstrate that the rail operational need for the Cricklewood sidings lands is fully protected.

Barnet council response

Change document?

Add after the 6th sentence of para 1.22 "The operational needs of the rail industry will be protected."

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | 1.22 | | |

180 /2262 Power

Cricklewood Redevelopment Ltd

Comment

Corrections

Barnet council response

Agreed

Change document?

Add "West Hendon & Brent Cross" to fourth sentence after "Cricklewood" and "seek to" in penultimate sentence before "ensure"

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | P.J | Community Foods Ltd. | 1.22 | | |

346 /2003 Woodhams

Comment

About 70 full-time staff work in our Brent Terrace premises. These jobs are under threat if we are not allowed to continue running our food cash and carry business because the premises are demolished for an office block.

Barnet council response

There are no plans to demolish premises, details will be considered later, through planning applications.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Railfuture London Branch | 1.22 | | |
| 368 /2330 | Dyall | Railfuture | | | |

Comment

As unemployment is 3.7% in Barnet against 3.6% for outer London compared to 7% for Inner London, it is not a major concern for Barnet. The workforce will have to be imported and this proposal will not reduce the need to travel.

Barnet council response

The unemployment rates locally in May 2002 were 5.5% in West Hendon, 5.4% in Golders Green and 4.3% in Chills Hill wards when the equivalent Barnet rate was 3.6%. This suggests a local issue with unemployment which any proposal will address.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Carolyn | Apcar Smith Planning | 1.22 | | |
| 345 /1976 | Apcar | Clutch Direct | | | |

Comment

Clutch Direct occupy railway arch accommodation at Adrian Avenue, NW4. From the amendment of the proposals map it does not appear as if this accommodation or other railway arches in the vicinity will be affected by the Regeneration Area proposals. However, since the proposals are not site specific at present, Clutch Direct wish to object to the absence of a specific policy requiring the retention of all existing commercial uses or, if this is not possible, a clear requirement that any displaced businesses will be relocated in acceptable premises in the vicinity.

Para 1.22 of the Draft Chapter refers to the Council working with developers to ensure that businesses displaced are relocated to sites or locations that are not detrimental to that business. The objection would be met if the text in the above paragraph is made into a formal policy to give this more weight.

Barnet council response

Reference to existing land uses will be made at the beginning of the chapter in paragraph 1.12. The council will aim to relocate businesses and this is an aspiration.

Change document?

See change 133/2058. Add to 2nd from last sentence of para 1.22 "seek to" before "ensure"

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Sue | Barnet Friends of the Earth | 1.22 | | |

286 /2082 Bird

Comment

The potential for job opportunities created around the recycling industry has not been clearly stated. It is a logical step to locate recycling businesses next to sites where collection and sorting takes place, in particular, to utilise the rail and retail facility in this area.

Suggested amendments:

Para 1.22 Add: 'and industry that takes advantage of rail freight and the materials recycling facilities'.

Barnet council response

Agree.

Change document?

Add to end of third from last sentence of para 1.22 "and the materials recycling facilities."

C11 - Implementation

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | | | |
| 180 /2278 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Need to refer, as in policies C1 and C7, to a masterplan application for phased implementation and that conditions are the main way of getting this. The middle sentence of Policy C11 could be deleted and the third sentence be amended to read:

"Developments permitted may be required to provide for or contribute to:"

Barnet council response

Agree to condense the policy.

Change document?

In policy C11 delete "negotiate with" and replace with "require".

Add after "provide for the" ; "following;".

Delete the 2nd and 3rd sentence of policy C1.

Add sentence with the S106 reference to para 1.24 after 2nd sentence to state "This may be secured through the use of planning conditions or section 106 agreements attached to planning permissions in the area."

| | Name | Organisation name/Client | Para start | end | Page no. |
|-----------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Sue | Barnet Friends of the Earth | 1.23 | | |
| 286 /2090 | Bird | | | | |

Comment

Objection as Policy C1.

Suggest a stated 'sequence of development' as our Policy C6.

Barnet council response

Disagree. The order of development will depend on the circumstances at the time and sufficient flexibility is needed to be given for detailed future plans.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Keith | Mason Richards Planning | 1.23 | | |
| 354 /2054 | Fenwick | Castlemore Securities Ltd | | | |

Comment

Paragraph 1.23 again places reliance on the idea that there will be a form of comprehensive 'outline planning permission'. It is noted that this has now progressed from being a 'proposal' to an 'application/permission'.

It is simply not sufficient to rely on an unnamed philanthropic developer/landowner/interested party to pursue an outline planning permission, which will provide for the sequencing and financing of the whole area, which the Council envisage. This is the role of the Council as Planning Authority.

The implementation section of the plan must recognise that it is the role of the Borough Council to produce an overall masterplan, with a series of objectives in terms of infrastructure provision, and to provide the policy mechanism and means whereby contributions can be made and submitted towards a general 'pot' of schemes which have been designed, tested and costed, if not in fine detail, at least in terms of their broad aims, expectations, and parameters in terms of achieving the aims set out.

Within such a positive, policy framework, developers would be more able to make clear and understandable financial contributions towards appropriate schemes, consistent with the policy guidance contain within Circular 1/97.

Within this context, policy C11 is not objected to, as it appears to recognise more clearly the role of Section 106 Agreements and conditions in achieving a series of objectives. The policy might, however, make additional reference to such contributions being consistent with the masterplan approach advocated throughout these representations.

Barnet council response

Agree

Change document?

See change 180/2278. In para 1.23 in fifth line delete "outline planning permission." and replace with "a future Development Framework and Masterplans"

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Support | Donald | Camden (London Borough of) | | | |
| 367 /2217 | Chambers | | | | |

Comment

Support the principles contained within this policy.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Donald | Camden (London Borough of) | | | |
| 367 /2218 | Chambers | | | | |

Comment

Although supporting the principles contained within this policy, we believe it is too flexible. Support infrastructure will be vital if the desire to create a socially sustainable thriving place which meets local needs is to be achieved. The current wording of the policy implies that there will be too great a reliance on S106s to achieve infrastructure which is it is essential to provide.

Presumably there are other policies within the Barnet UDP which provide for support infrastructure, particularly social infrastructure, and these should be mentioned to give more weight to the policy.

The policy needs to be more prescriptive. The phrase 'negotiate with developers' should not apply to essential infrastructure, without which planning permission should not be granted.

Barnet council response

Agree

Change document?

See change 180/2278

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Howard | The Highways Agency | | | |
| 356 /2063 | Moore | | | | |

Comment

Policy C11 correctly identifies the need for planning conditions, but we are wondering as to the extent to which this policy duplicates policies C1 and C7.

Barnet council response

Policy C1 sets the context for the other policies with C11 working more detail and C7 specifically on transport issues.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Philippa | Freight on Rail | | | |
| 357 /2074 | Edmunds | | | | |

Comment

1.25 Policy C11

There is not mention of rail freight provision and waste transfer provision which we believe are vital components of the Cricklewood redevelopment.

Freight on Rail believes that the rail freight facility must incorporate facilities for:-

- a) Aggregates and bulk goods
- b) sufficient warehousing to make the facility financially viable, we maintain that cross docking facilities alone are not sufficient
- c) good road connections
- d) rail connections with the waste transfer site which must have reasonable road access.

Barnet council response

The general requirement for railfreight and waste are contained in policy C10 and the detail will be determined in the application.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------------|-------------------|------------|-----------------|
| Object | Jean | Woolmead Avenue Residents Association | | | |

285 /1984 Ivatt

Comment

When are we likely to see the outline planning for additional infrastructure for both West Hendon and Cricklewood? Work is due to start in 2004 in West Hendon and there is complete silence on the need for schools, hospitals and health care, plus additional public transport. A case of putting the cart before the horse!

Barnet council response

This will be considered in the Framework and Masterplans in the future.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Julian | Montagu Evans | 1.23 | | |
| 360 /2321 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

Support this policy as it refers to matters that individual planning applications will need to deal with on different parts of the site. Many issues in Policy C7 are included in C11. Delete references to an outline application as referred to for policy C1

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Anita | Drivers Jonas | | | |
| 369 /2241 | Young | Department of Health and Social Care - London | | | |

Comment

The DoHSC welcomes the reference to the use of section 106 agreements to secure new or improved health facilities to meet the need generated by development/regeneration in Policy C11.

Barnet council response

Support noted

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Anita | Drivers Jonas | | | |
| 369 /2242 | Young | Department of Health and Social Care - London | | | |

Comment

We believe that when assessing proposals for major new development, the Council should consult with the relevant NHS Trust at an early stage to establish the likely impact on local health services. Where it is clear that a proposed development will have an impact on existing health facilities, the Council should seek to secure necessary funds to mitigate that impact via a legal agreement.

Barnet council response

The NHS Trust will be consulted, along with other stakeholders when further plans are drafted.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Object | Martin | Scott Wilson | | | |
| 372 /2304 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

While MHT/ Lovell supports Policy C11, it considers there should be a reference to the commitment of the Local Authority to use compulsory purchase powers where necessary in order to facilitate the effective regeneration of the area.

Barnet council response

Agree

Change document?

Add to end of 2nd sentence of para 1.24 "and may use its compulsory purchase powers to enable comprehensive development to proceed."

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---|-------------------|------------|-----------------|
| Support | Martin | Scott Wilson | | | |
| 372 /2303 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

MHT/ Lovell supports the principle of Policy C11.

Barnet council response

Support noted

Change document?

Paragraph(s)

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | 1.24 | | |
| 180 /2279 | Power | Cricklewood Redevelopment Ltd | | | |

Comment

Need to refer to the CPO powers that the council can use in the scheme. Add to paragraph 1.24 as second sentence ;

"The Council will use compulsory purchase powers where necessary to assist with the delivery of the comprehensive regeneration of the area in recognition of the importance of the Area in meeting the Council's and strategic policy objectives for economic and social development in the North London sub region."

Barnet council response

Agree

Change document?

See change 372/2304

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Ken | Greater London Authority | 1.24 | | |
| 188 /2151 | Livingstone | | | | |

Comment

Due to the strategic nature of the development proposals it is considered that the negotiations between the local planning authority, relevant land owners and the developers will be influenced by the participation of the Strategic planning authority for London (the Mayor of London) and should be recognised within the chapter. This will assist in ensuring for added transparency in the planning process.

Barnet council response

Agree

Change document?

In the first line of para 1.24 between "will" and "negotiate" insert "in association with the strategic planning authority for London, the Mayor of London.."

Proposals Map

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|------------|---|------------|-----|----------|
| Object | Julian | Montagu Evans | | | |
| 360 /2322 | Stephenson | Hammerson UK Properties / Standard Life | | | |

Comment

The map should refer to an "existing town centre" and not a new town centre. The boundary should not extend south of the North Circular as a large quantum of retail floorspace could be developed here with little control over its scale given that need does not have to be tested within town centres. The northern car park should be included.

Barnet council response

The northern car park to Brent Cross Shopping centre is included. The scale and mix of uses to the south of the North Circular will be proposed in a framework document.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|---|------------|-----|----------|
| Object | Martin | Scott Wilson | | | |
| 372 /2305 | Herbert | Metropolitan Housing Trust/ Lovell Construction | | | |

Comment

Reference to the 'New Town Centre' should explain that in this area the following uses will be encouraged; retail, leisure, offices, hotels, housing and community uses.

Barnet council response

This is explained in policy C6 as amended.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|----------|----------------------------|------------|-----|----------|
| Object | Donald | Camden (London Borough of) | | | |
| 367 /2194 | Chambers | | | | |

Comment

The proposals map indicates that a Brent Cross town centre would be substantially larger than the existing shopping centre but the chapter does not indicate what mix of uses should be included or at what scale. Camden would object to significant enlargement of retail floorspace at Brent Cross - see our comments to policy C6.

A new policy should be included which specifically states what mix of uses is required for a new town centre at Brent Cross and at what scale.

Barnet council response

The components of the mixture of uses in the new town centre is contained in the amended policy C6 with the proportions of each use to be decided at the Masterplan stage.

Change document?

| | Name | Organisation name/Client | Para start | end | Page no. |
|------------------|---------|--------------------------|------------|-----|----------|
| Support | Nick | English Nature | | | |
| 269 /1968 | Radford | | | | |

Comment

Through English Nature's discussions with the Council regarding this Regeneration Area this importance has been highlighted. As such English Nature support the re-drawing of the allocation boundary for the Regeneration Area so that it no longer encroaches into the SSSI itself.

English Nature does object to the lack of representation of the SSSI on the amendments of the Proposals Map (July 2002). The national nature conservation importance of the site should be illustrated in order to properly inform potential developers of the full range of issues to be addressed. We have attached a map of the SSSI boundary for your information.

Barnet council response

Agree

Change document?

Add boundary of the SSSI to the proposals map/

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | Mary | GVA Grimley | | | |
| | Power | Cricklewood Redevelopment Ltd | | | |

Comment

CRL broadly welcomes the principle of a Proposals Map in conjunction with the proposed chapter. However, CRL objects to a number of specific issues, which need to be amended as follows:

1. New mixed-use town centre insert "retail, leisure, offices, hotels, residential and community facilities."
2. The route of the proposed RTS is incorrect and indeed part of the route indicated in respect of Brent Cross Underground Station is not feasible. CRL requests that the route of the RTS be amended as indicated on the attached plan.
3. The location of the proposed new Cricklewood station is incorrect and should be relocated as indicated on the attached plan.
4. The "Employment and Mixed-Use Land" designation should be constrained to land on west side of the rail lines and refer to Employment and Rail Related Uses.
5. Land on east side of rail lines would be more appropriately designated as Residential, Mixed-use and Rail Uses.
6. The location of the existing Cricklewood, West Hendon and Hendon Central stations should be indicated on the Proposals Map.

Barnet council response

1. Agree that it will be a mixed use development however policy C6 defines what this means in practice;
2. The route of the RTS is indicative. The actual route will need to be determined by the normal planning processes having regard to the locations that will generate ridership and in consultation with Transport for London. The comparative feasibility of connections to stations on the Edgware branch of the Northern Line will have to be assessed as part of this process;
3. This plan is indicative with flexibility implied in the location of the new station;
4. & 5. Agree that emphasis is needed to be given to the site allocated for employment uses for rail related uses;
6. Agree

Change document?

1. No change
2. Link the route of the proposed RTS south to the existing Cricklewood station and add a note to the plan to say that the route is indicative;
3. No change
4. & 5. Add "Rail related" before "Employment and Mixed-use land" in key to map;
6. Add location of all stations nearby; Hendon and Cricklewood overground stations, Hendon Central & Brent Cross underground stations.

| | Name | Organisation name/Client | Para start | end | Page no. |
|--------|-------------|---------------------------------|-------------------|------------|-----------------|
| Object | | Wimbourne Martin French Ltd | | | |
| | | | | | |

Comment

The station should be located over the North Circular, moved north on the map, so that passengers can access from both sides with a new footbridge alongside the eastern platform that could be entirely glass roofed and ventilated to minimise nuisance from vehicle emissions. The 1960s underused footways over the roads could then be removed.

The bus route to the tube stations is a weak proposal and one should concentrate on upgrading the Thameslink City Metro that is above ground, with 12 coaches and in greater frequency.

Barnet council response

The development of a railway station or public transport equivalent will be the subject of the masterplan application.

Change document?