

Vijaya Ram
Strategic Planning and Regeneration
Planning
North London Business Park
Building 4
Oakleigh Road South
N11 1NP

16th May 2012
Our Ref: RB/JR C-0156911

Dear Sir / Madam,

London Borough of Barnet – Core Strategy and Development Management Policies

Representations on behalf of Universities Superannuation Scheme Ltd

Introduction

Drivers Jonas Deloitte is instructed by Universities Superannuation Scheme (USS) to advise on planning matters in respect of its commercial assets at Finchley Industrial Centre and Capitol Park in Colindale. USS therefore has an active interest in the formulation of planning policy in the London Borough of Barnet ('LBB').

Following the publication of the National Planning Policy Framework ('NPPF') in March 2012, we set out below USS' comments on the LBB 'Further Changes' consultation of the Core Strategy and Development Management Policies Document. These comments are in line with those submitted to the Submission documents in June 2011.

Core Strategy

New Policy – CS NPPF

USS notes inclusion of the new 'NPPF' Policy, 'CS NPPF'. This Policy states that Local Plans should follow the approach of the presumption in favour of sustainable development in both plan making and sustainable decision taking. USS is pleased to note that this new policy will consider development proposals positively and that development which is deemed sustainable should be approved without delay.

Promoting a Strong and Prosperous Barnet

As proposed in the Submission document, the Core Strategy continues to seek the protection and retention of employment sites across the borough. As highlighted in para.9.6.7, at present only 3% of LBB employment stock is appropriate for release.

Further comments on policies which seek to retain employment sites in the borough are set out below.

Development Management Policies

NPPF Implications for Employment Allocations

USS previously raised concerns regarding the flexibility of the Council's policies in considering alternative uses at employment sites. USS previously stated that if there is a valid viability argument, or if the site could be considered suitable for alternative uses, then the site should be meaningfully used to stimulate the economy.

Accordingly, USS supports the Council's amendment to para.15.1 which states that local planning authorities should use an evidence base to assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs.

In line with the publication of the NPPF, USS is particularly supportive of para.22 which states that planning policies should avoid the long term protection of sites allocated for employment where there is no reasonable prospect of the site being used for that propose. USS is pleased to note that land allocations will be reviewed regularly.

Conclusion

USS is pleased to have the opportunity to comment on the emerging London Borough of Barnet Local Development Framework at the Further Changes consultation stage. USS requests that the Fund continues to be updated on the programme for the various Local Development Documents.

Should you have any further queries regarding any of the comments made above, please do not hesitate to contact Jayme Radford on 0207 303 5458 or at jayradford@djdeloitte.co.uk.

Yours sincerely



John Adams
for Deloitte LLP (trading as Drivers Jonas Deloitte)