

Leo Boland  
The Chief Executive  
London Borough of Barnet  
North London Business Park  
Building 4  
Oakley Road South  
London N11 1NP

Dear Sir

## **BARNET UNITARY DEVELOPMENT PLAN - REPORT ON OBJECTIONS**

I was appointed by the Secretary of State to hold a public inquiry into objections to the Barnet Unitary Development Plan (UDP). The Inquiry was held between 3 March and 24 May 2004 and sat for a total of 10.5 days. A further 5.5 days were spent conducting site visits. A Pre-Inquiry Meeting was held on 11 November 2003 when procedures were explained to the objectors and the public. I attach my Report which contains my recommendations on the action that the Council should take in respect of the objections.

The Council's Opening Statement documents the history of this Plan. Barnet was the first London borough to adopt a UDP in the initial round, in 1991. The Council embarked upon the review which led to this new UDP in 1998. The Deposit Draft UDP was issued in July 2000 and a Revised Deposit version in March 2001. A volume of Pre-Inquiry Changes was then published in January 2003. An additional UDP chapter on the Cricklewood, West Hendon and Brent Cross Regeneration Area was approved by the Council in July 2002, a revised version in January 2003 and Pre-Inquiry Changes in January 2004. I deal with the related objections in Chapter 13 of my report.

By the time of the close of the Inquiry, a total of 1266 First Deposit objections remained to be considered, a further 255 having been withdrawn. There were 568 Revised Deposit objections remaining and a further 559 Pre-Inquiry Change objections. Where objections were unconditionally withdrawn, the matters they raised are no longer before me and I do not deal with them in my Report.

During the Inquiry, I held a round table discussion on affordable housing. Its conclusions provided a useful input to my Report. The remainder of the sessions were in the form of hearings or more formal inquiry sessions. However, the majority of the objections were made in writing, and these and the Council's responses have been considered just as fully as objections heard at the Inquiry. During the Inquiry and afterwards, I visited all of the numerous sites which have been the subject of objections.

In my consideration of all objections I have had regard to submissions made by or on behalf of the various objectors and the Council, and to all other material considerations, including current planning policy guidance (PPGs), relevant Regional Planning Guidance (RPGs), Circulars and The London Plan, the Mayor of London's Spatial Development Strategy for Greater London. I have also had regard to those representations in support. In their consideration of my recommendations, the Council will need to take into account any PPG, Circular or other Government advice published subsequent to the completion of my report.

The adoption of the London Plan in February 2004 is of major significance. My recommendations make numerous references as to how this UDP should be updated so as to take full account of the important strategic policies in the new Plan.

During the Inquiry the question of general conformity with the London Plan was raised by the Council and I was presented with a copy of a Consultation Draft Guidance Note published by the Mayor of London in March 2004. In the closing stages to the Inquiry I

was given a response to this prepared by the Government Office for London on behalf of the First Secretary of State. This includes a written statement made by the Secretary of State in the House on 19 April 2004. As far as I can see, however, this question of general conformity does not affect my consideration of the Mayor's specific objections or of any other objections to this UDP. I have addressed them on their individual merits in the context of the London Plan and all the other guidance listed above.

## **Format of Report and Main Issues**

My report follows the general sequence of the UDP. For each policy, or set of related policies, I first summarise the issues that have been raised, all of which I have taken into account. I then set out my conclusions and recommendations. My numerous recommendations are brought together in Appendix 1. I make extensive use of acronyms and these are listed immediately after the Contents pages.

I summarise below what I judge to be the most significant conclusions of my report. Overall, I consider that there were five **main issues**, these being: the proposed new town centre at Brent Cross/Cricklewood; the Green Belt and its boundaries; policies aimed at higher residential densities; affordable housing policy; and car parking policy and standards.

**Chapters 1 and 2** deal with various strategic matters including objections to Part I policies. Among other things, they highlight the need to bring the UDP fully up to date. The newly adopted London Plan now provides the strategic framework for housing growth and in this, and in other strategic areas, the UDP will need to reflect this new policy context.

**Chapter 3** addresses a wide range of Environmental Resources topics. These include sustainable development and the emphasis to be given to its various facets, and waste management and the challenges set by the move towards regional self-sufficiency. However, perhaps the most difficult area is that of air quality, recognising that much of Barnet's problem stems from vehicle movements along several national traffic routes that pass through this area. As I discuss in Chapter 13, this issue is highly relevant to the proposed developments within the Brent Cross area.

I single out the section on Quality in Design, reported upon in **Chapter 4**, as one of the most important of the entire UDP. As is the case strategically for London as a whole, it is central to the objectives of the UDP. Good design will be vital if the Council is to achieve its dual aims of accommodating substantially more development, while protecting and enhancing the Borough's environment. In particular, the intended tall buildings will have to be of the highest quality of design and their siting will be of key importance. Among my recommendations, I refer to the good practice guidance published by the Commission for Architecture and the Built Environment (CABE).

**Chapter 5** generally endorses the Council's approach regarding the Green Belt. I conclude that there should be three major developed sites (MDS), the two proposed Medical Research Council sites being combined as one. However, I do not support the identification of Arkley Park as an MDS. Neither do I support any changes to the Green Belt boundary. My interim report to the Council addressed the situation of Barnet Football Club, Underhill. Other objectors sought to justify the release of Green Belt land on the grounds of housing need. However, in concluding in each case that exceptional circumstances had not been shown, I have reached the view that sufficient land is available within Barnet's built up area.

**Chapter 6** deals with Leisure, Recreation and Tourism. I draw attention to the need for Barnet to carry out an assessment of the needs of its communities for open space and built sports and recreational facilities. Coupled with the required audits of facilities, the assessment will provide the starting point for establishing a strategy for open space,

sport and recreation. Among other things, it will enable local open space standards to be set.

A major issue in **Chapter 7** on Movement concerns parking policy and parking standards. I conclude that parking standards are, to a large measure, a strategic, London-wide matter. Therefore, I recommend that the UDP's standards be reviewed and updated taking into account those for London as a whole. In particular, I recommend that Barnet's residential standards be maximum standards, not minimum ones, thereby bringing them into line with both national guidance and with the London Plan. On other matters, I recommend that there be a new policy dealing with the 'school run' and that the A1000/ A598 be designated as Tier 2 routes on the Proposals Map.

The issue of housing densities, dealt with in **Chapter 8**, is closely linked to that of public transport accessibility. Under Policy H21, I conclude that the Council have made a useful start in identifying those areas that might best accommodate the higher densities upon which Barnet's growth plans will depend. However, I recommend that the Council could go further in two main respects. First, as a more sophisticated approach to determining appropriate densities, it should consider adopting the London Plan's density, location and parking matrix/PTAL approach. Secondly it should extend the higher densities proposed for six town centres to all of Barnet's District Town Centres.

On affordable housing, given the scale of the need, I recommend that Barnet adopt the Mayor's strategic target which is that 50% of housing provision should be affordable. This should come from a variety of sources, including direct provision by Housing Associations. As far as other developers are concerned, the Council should seek to negotiate the maximum reasonable amount of affordable housing on sites of 15 or more units gross or 0.5 hectares or more. I also recommend that future supplementary planning guidance (SPG) should deal with the appropriate split between social and intermediate housing.

**Chapter 9** deals with a range of Community Services. In respect of Policy CS8 on educational needs generated by new housing development it recommends revised wording to make it fully compliant with Circular 1/97 on Planning Obligations.

One of my main conclusions in **Chapter 10** on Employment is that the priority re-use for redundant employment sites should be mixed use development for employment and housing. In line with my recommendation that Housing Policy H6 be deleted, the affordable housing component should be determined in the same way as on any other site, namely through the application of Policy H5.

**Chapter 11** deals with Town Centres and Retailing. It explores the application of the sequential approach and, among its recommendations, it calls for a fuller explanation of the methodology followed by the Council in identifying its potential development sites for town centre uses. It also recommends discussions with the GLA with a view to reconciling the present differences in the retail hierarchy as set out in the UDP, on the one hand, and the London Plan on the other.

**Chapter 12** on Implementation deals briefly with the question of planning obligations. Policy IMP2 is a general, across the board, policy. I support the revised wording.

**Chapter 13** covers the UDP's separate chapter on the Cricklewood, West Hendon and Brent Cross Regeneration Area. As is explained, the UDP has been very substantially modified to reflect the evolving situation in this area, in particular the recognition that the future planning of Brent Cross should seek its development as a town centre. I conclude that this regeneration proposal is in line with the London Plan's polycentric vision for the capital, and that it should be an important contributor to Barnet's targets for homes and jobs. At the same time, the development must embody the highest design and environmental standards. Provided the details can be got right, there is the

potential to create an attractive town centre with many benefits for the local area and for Barnet and North London as a whole.

On the specifics, I recommend changes to Policy C6 which address the amount of comparison retail floorspace and deal with approval mechanisms for other types of floorspace. For the reasons given, I also recommend that the boundaries of the proposed town centre be drawn to exclude land to the south west of the A406/A41 Hendon Way junction. I make a range of other recommendations. These relate to, among other things: West Hendon and the need for a new policy; sustainable development; transport interests; environmental protection; and parking policy.

**Chapter 14** reports upon the Council's Schedule of Proposals. Among many other proposals, it addresses a potential development centred upon the Golders Green Bus and Underground Station. While I broadly endorse the possibilities for a scheme that now excludes the maintenance depot, I conclude that an overall benefit would need to be shown. The vision and the detail would be critical.

### **Other Matters**

A complete set of documents submitted in connection with the Inquiry may be inspected at the Council's offices at Barnet House, 1255 High Road, Whetstone, London N20 OEJ. A copy of this letter has been sent to the Government Office for London.

Finally, I should like to express my gratitude to all participants for their co-operation in ensuring the efficient running of the Inquiry and to the Council for providing me with such a good Programme Officer. I should also like to thank my two Planning Officers, Christian Ford and Alan Netley for all their valuable help.

Yours faithfully

A handwritten signature in blue ink that reads "Chris Gossop". The signature is written in a cursive, slightly slanted style.

Chris Gossop

Inspector