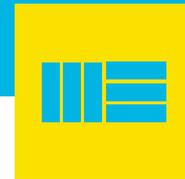


# CONSULTATION RESPONSE



## TO

London Borough of Barnet

## FROM

Montagu Evans LLP

## DATE

April 2023

## SUBJECT

Barnet Local Plan EiP: Consultation Response

### INTRODUCTION

1.1 Montagu Evans LLP (“ME”, “we”, “us”) has been instructed by John Lewis Partnership (‘JLP’, the ‘Client’) to review and respond to the notes prepared by the London Borough of Barnet (“LBB”) following the Examination in Public sessions for the Emerging Local Plan. This response forms an appendix to a wider pack of representations coordinated by the planning consultants, Lichfields.

1.2 JLP has an interest in the site at 2 Langstone Way, Mill Hill (the ‘Site’). Representations made on behalf of JLP in September 2022 focused on *Matter 8: Design, Tall Buildings and Heritage in the Inspectors’ Matters, Issues and Questions for Hearing Sessions – Autumn 2022*. The representations concluded:

*“In our judgement the Site offers a good opportunity to provide a tall building of G+7 in Mill Hill East. The Site connects the established and commercial character of townscape to the south of the Site to the emerged, new character to the north in the new developments on the former barracks site. We have established that there is the potential for a cumulative effect, with the allocated site (Site 47) of the Barnet Local Plan occupying land to the north of the railway tracks at Mill Hill East underground station. With regard to Policy CDH04, Mill Hill East (Underground Station and Waitrose) should be added to the list of locations where tall buildings are acceptable in LBB. In addition, the text modification to GSS07 that suggests Mill Hill East is not a suitable location for tall buildings should be reconsidered as it is unfounded in terms of policy base.”*

1.3 Our representations provided context and analysis that suggests that the townscape condition of the Site would be suitable for a tall building, by LBB’s 8-storey definition, in this location. These are summarised as:

- Located within the defined Mill Hill East Centre in an area of growth;
- Adjacent to Site Allocation 47 in the Barnet Local Plan;
- Already developed land/a brownfield site;
- Close to Mill Hill East underground station;
- Mid-rise datum in the immediate area; areas of intensification to the north east;
- Lack of heritage sensitivities (nearest conservation area 500m+ away); and
- A PTAL rating of 3.

1.4 The consultation response set out in this note focusses on the following LBB Notes that may have a bearing upon the redevelopment of the Site, comprising:

- EXAM 75: LBB Note on Site Allocations

- EXAM 16 - LBB Note on Identification of Strategic Policies in MM17
- EXAM 34- Map 3E - Mill Hill East Area
- EXAM 79 - LBB Note on Tall Buildings

#### **EXAM 16: LBB Note on Identification of Strategic Policies in MM17**

- 1.5 Page 2, fourth bullet point of 'Character Design and Heritage' section (relating to Policy CDH04 Tall Buildings) creates ambiguity with p. 4 of Exam 79 Note on Tall Buildings. London Plan D9 part A states that 'Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 measured from ground to the floor level of the uppermost storey.' Further uncertainty arises in EXAM 16 where LBB define tall or very tall buildings at '8 storeys / 26 metres and above', not specifying whether this is for tall or very tall buildings. It is assumed, however, that this is the definition of a tall building, as p. 4 of EXAM 79 defines very tall buildings as being 15 storeys. Further, LBB should provide heights in metres from the ground to the floor level of the uppermost storey, in line with the wording in London Plan Policy D9.

#### **EXAM 34: Map 3E – Mill Hill East Area**

- 1.6 The map supports EXAM 75 and does not include the Waitrose site within Site 47. As stated in Lichfield's response, there is a recognition that TfL and JLP could collaborate within the site allocation should it be extended, however, there would need to be a recognition that they may have different delivery programmes and may come forward separately. This extension of the allocation is something which JLP would support.

#### **EXAM 75: LBB Note on Site Allocations**

- 1.7 Para 191 confirms that the boundary of Site Allocation for Site 47 will not be revised to include the Waitrose site. It is accepted that any development that comes forward on either site should include scope for the optimisation of both Site 47 and the Waitrose site, as this would be both in line with London Plan policy D3 Optimising site capacity through the design-led approach.
- 1.8 Para 193 suggests that heights of up to six storeys are acceptable, taking cues from the nearby Millbrook Park site. However, with regards to the tests required for additional height (i.e. townscape hierarchy with its position next to the station, topography, urban condition, environmental conditions), the existing heights of the surrounding context should not be the benchmark for the maximum heights to come forward.
- 1.9 Para 193 discusses the potential development around the station building, given its local listing. As with any planning application whereby the value of heritage assets could be altered by the presence of a proposed development, a full heritage statement should be submitted, in line with Historic England's The Setting of Heritage Assets (2<sup>nd</sup> Edition, 2017).
- 1.10 The wording of the Site requirements should be altered to reflect that each site (in relation to Site 47, TfL owned land and the Waitrose site) should come forward independently, taking into account differing delivery programmes.

#### **EXAM 79 - LBB Note on Tall Buildings**

##### ***Tall Buildings Outside of Strategic Locations***

- 1.11 JLP accept the LBB's desire to steer tall building development towards given locations is consistent with the London Plan Policy D9 part B. JLP also welcome that the LBB accept that other tall building locations may come forward where it has been demonstrated through analysis of criteria that an area can accommodate higher density development on specific sites, including tall buildings. This response acknowledges the High Court case R (LB of Hillingdon) v Mayor of London [2021] (see Question 2 and 3).
- 1.12 This notion is not, however, reflected in the modifications to the policy drafting. It is recommended the drafting reflect that tall buildings could come forward outside the strategic locations identified in CDH04 subject to a detailed assessment of the LP D9(C) filters. This drafting would conform with the London Plan and relevant parts of the NPPF that seek to make effective use of land in urban areas.

### **Very Tall Buildings**

- 1.13 It is welcomed that the test of "exceptional circumstances" has been removed to demonstrate suitability for the Very Tall Buildings; however, the response to question 19 proposes the following redrafting of policy:
- 'Very Tall Buildings of 15 storeys or more are not acceptable outside a Growth Area identified as a strategic location in CDH04A.'*
- 1.14 This contradicts the stance taken elsewhere in the answer to Point 14 whereby the acceptance of Very Tall Buildings should still be taken on a case-by-case basis.
- 1.15 The height threshold for Tall Buildings and Very Tall Buildings is not informed by a granular analysis of the local area. The lack of a robust evidence base affirms that these thresholds must form guidance to be tested through detailed planning assessments, rather than absolute parameters. We therefore recommend additional text recognising that there is scope for greater height where a full evidence base or where criteria-based assessment supports it.
- 1.16 This approach was recently tested by the Planning Inspectorate at the Brent Local Plan Review. The January 2022 Report on the Examination of the Brent Local Plan found the Tall Building Policy BD2 to be sound (here).
- 1.17 The adopted Brent Local Plan acknowledges "heights likely to be generally acceptable to the council"; however, paragraph 6.1.15 of the Brent Local Plan states: "There might however also be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable". Policy BD2 thus includes the necessary level of flexibility to support the planning application process, and the need to meet other policies of the development plan. This is consistent with the D9(C) and wider Framework approach we note above.
- 1.18 We consider that the approach in the examination of the Brent Local Plan is sound and can be adopted by the LBB.

### **Mill Hill East**

- 1.19 Question 12 refers specifically to Mill Hill. The inspector requests reasoning for why these areas have been excluded from potential tall building zones. In relation to Mill Hill East, the LBB state the "Mill Hill East and around Hendon Station is low to mid rise." This statement is not specific evidence to demonstrate that the exclusion of the Site is Justified in accordance with the NPPF.
- 1.20 The response to question 12 also implies that Mill Hill East is similar to North London Business Park, which is described as 'predominantly two storey semi-detached and terraced housing. The site is remote from the nearest station, Arnos Grove which is located 2km to the south. The PTAL of the site ranges from a very poor 1b to a low 2. Tall buildings would not be in keeping with the suburban character of the area'.
- 1.21 In contrast, Mill Hill East has a very mixed character, with prevailing scales at 6 storeys, plus large retail and/or commercial units such as the Site. The Site itself is also located approximately 70m from the nearest station. Higher density development on the Site has the potential to be complementary to the surrounding context. The

representations made by Montagu Evans on behalf of JLP dated September 2022 sets out further justification for why the Site is appropriate for high density development, including the development of tall buildings.

### **SUMMARY**

1.22 JLP welcomes the general thrust of the proposed changes by LBB to the emerging Local Plan; however, we recommend the following modifications to ensure that the plan is sound and is able to support the optimisation of the Site:

- The policy drafting reflect that Tall Buildings and Very Tall Buildings *could* come forward outside the strategic locations identified in CDH04 subject to a detailed assessment of the LP D9(C) filters;
- Definitions of Tall Buildings and Very Tall Buildings to be provided in metres, not just storey heights, and should be in line with the wording of the London Plan (i.e. from the ground to the floor level of the uppermost storey). This should also take into account additional height for plant and/or lift overrun that should form an integrated part of the building design;
- Mill Hill East be identified as a location suitable for Tall Buildings.

1.23 The policy as proposed would remain far more restrictive than the policy approach in D9 and would depart from the NPPF, because It seeks to prohibit tall buildings in specific locations and/or over a set height without:

- a) specific evidence, which is as a result not justified; or
- b) allowance for application of the LP D9(C) filters (which as a result is not in conformity with the London Plan or consistent with the NPPF approach to see effective use of land in urban areas and criteria-based approach to design excellence noted above).

1.24 On behalf of JLP, thank you for providing the opportunity to comment on the LBB Notes. We trust the enclosed is a helpful response, however, do not hesitate to contact us should the above need to be discussed further.

**Montagu Evans**

**26.04.23**

**Waitrose, Mill Hill East  
Further Statement in Support of  
a Mixed-Use Residential  
Allocation in the Emerging  
Barnet Plan**

21 April 2023

**LICHFIELDS**

26525601v1

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## 1.0 **Introduction**

### **Background**

- 1.1 We are instructed by the John Lewis Partnership (JLP / The Partnership) to make further Representations, following the Draft Barnet Plan Examination in Public (EiP) in 2022.
- 1.2 This follows Barnet Council's further responses to the EiP Sessions and the Inspectors' directions for further Representations by 26<sup>th</sup> April 2023.
- 1.3 These Representations add to those already made in respect of the potential for mixed use redevelopment of the Waitrose store at Mill Hill East. Separate Representations in respect of Tall Buildings / building heights are submitted alongside these by Montagu Evans.
- 1.4 John Lewis has a Partnership Plan in place to restore its profitability, an important element of which is to diversify from its retail core into the Build to Rent (BTR) market, aiming to deliver some 10,000 homes under its management in the next 10 years.
- 1.5 The initial focus is on a limited number of existing locations, through utilising airspace above its retail assets, whilst ensuring a strong retail operation remains. The John Lewis Partnership wholly owns its Waitrose store at Mill Hill and proposes this site to be one of the first to be promoted for this exciting new BTR initiative.
- 1.6 The Council has acknowledged, as part of the EiP, that they are comfortable with the site coming forward as part of the usual development management process. Positive pre-application discussions have also been held with the Council to advance a mixed use, residential led scheme for the site.
- 1.7 The site is anticipated to deliver 140 units and can be delivered within the 1-5 year Plan horizon.

## 2.0 **Further Representations to Reg.19 Draft Barnet Local Plan**

- 2.1 Representations to the Reg.19 Draft Barnet Local Plan (BLP) have been duly made in support of a mixed use residential allocation on the existing site of Waitrose Mill Hill. It is not our intention to substantially repeat these.
- 2.2 The Partnership proposes to maintain its retail food store at Mill Hill East for Waitrose, to help sustain the local centre and serve the wider community, alongside the development of the site for approximately 140 Build to Rent (BTR) residential units, which will include building above the Waitrose retained car park. These homes will be owned jointly with an investor and will be developed and run by JLP.
- 2.3 The timing of The Partnership's decision to progress this opportunity meant that it was not possible to make representations on earlier versions of the emerging Plan, notably the Reg.18 draft.
- 2.4 The Council's response to representations on the Reg.19 and in EXAM75, in relation to the potential synergy of the site with allocation 47 (Mill Hill East Station), is supportive of the site redevelopment for mixed use residential purposes. The site is also suitable, available and achievable for residential development. It is therefore disappointing the Council are unable to extend the opportunity of a site-specific allocation.
- 2.5 Within a local centre location, well accessed by public transport, we consider the Waitrose site and its car park, is highly capable of a mixed-use residential development to deliver homes and enhanced vitality and viability to the Mill Hill East area (APPENDIX A).
- 2.6 The EIP session of 8<sup>th</sup> November 2022 considered the deliverability of those sites within the Mill Hill East Area, following which, the Council were requested to respond with further justification to its allocations and proposed modifications (EXAM 75).
- 2.7 The following is relevant to the consideration of EXAM 75, and the Inspectors' further assessments.

### **Site 47: Mill Hill East Station**

- 2.8 The Council consider that the '*Site requirements and development guidelines*' for Site 47 should include reference to the potential optimisation of the site through comprehensive redevelopment with the neighbouring Waitrose site. However, the Council do not consider the site boundary should be expanded to include Waitrose. No reason is given for this.
- 2.9 From EXAM 75 there appears positive recognition of those discussions held during the Local Plan Hearing for the possible scope for comprehensive redevelopment of Mill Hill East, suggesting the Site Allocation boundary could be expanded to include the Waitrose Store. This would further support development at a highly accessible location, adjacent to Mill Hill East Station, and add to vitality and viability of the Holders Hill Circus Local Centre.
- 2.10 This extension of the allocation is something which both TfL and JLP would support, albeit we would wish to ensure that each site could come forward independently, in order to recognise that each site may have different delivery programmes.

- 2.11 It is noted by the Council, in respect of the Site 47 allocation, that the immediate context of the site is mixed with lower rise domestic properties and taller commercial buildings (circa 3-4 storeys) and that the Council consider that the appropriate height for the site can range up to six storeys, taking a cue from Millbrook Park.
- 2.12 The modifications also note the requirement for the preservation of mature trees is required. The station building and associated platforms and tracks must also be retained or be re-provided. Development around the station building also needs to be sensitive to the building's local listing. The Council response notes, should the station building be demolished, the loss of the locally listed building must be fully justified, and a replacement station building must be provided. This appears to set a number of further restrictions / parameters for the successful delivery of residential development on the site and we understand TfL are responding to this.
- 2.13 In our view it remains possible to achieve the 127 units anticipated for the site, through the provision of taller buildings, which should be appropriate, given its highly accessible location. The Council should support tall(er) buildings on this site and on the Waitrose site.

## Site 46: IBSA House

- 2.14 The Inspectors requested the Council provide an update on the status of the planning application 19/6551/FUL and clarify deliverability of development with the developer for its proposals to deliver 197 homes. The application received resolution to grant, subject to completion of a S106 agreement, on 6 April 2021.
- 2.15 In response, the Council has advised it is still in discussions with the applicant regarding the Heads of Terms of the S.106 Agreement (note not the S106 itself) for 19/6551/FUL but that this was likely to be resolved in early 2023. To date (End April 2023), there still appears no progress on the Council's Portal, with the last correspondence on the application being February 2020.
- 2.16 The Council notes, with regards to the site's deliverability, 'the Council does not have sufficient information from the applicant to establish what they intend for the medium-to-long term of the site.'
- 2.17 Based on this, the Council considers that the site is '*developable*' rather than '*deliverable*' and has moved the timeframe from 0-5 years to 6-10 years.
- 2.18 We consider doubt has to be cast on the delivery of this site, and the 197 homes it is forecast to yield, given the apparent lack of motivation in the last 2 years to advance the S106.
- 2.19 The response from the Council also fails to identify / acknowledge that the site, since the submission of 19/6551/FUL, has had further applications submitted and approved for enhancement of the existing operations on site, comprising:
- **Ref. No: 21/0332/FUL** Single storey front foyer extension of 49sqm and side extension of 147sqm to IBSA House building and sole use as Class E (g) (i) Office Space; Separate independent use of the former Printworks and existing factory buildings as Class E (g) (iii) Light Industrial or Class B8 Storage or distribution space; Relocation of the single storey Gate House building; re-use of existing car parking and servicing areas

to provide 80 surface level car parking spaces and 112 cycle spaces. **Approved 21/9/21.**

- **Ref. No: 22/0907/NMA** Non-material amendments to planning permission reference 21/0332/FUL dated 20/09/2021 for ` Single storey front foyer extension of 49sqm and side extension of 147sqm to IBSA House building and sole use as Class E (g) (i) Office Space; Separate independent use of the former Printworks and existing factory buildings as Class E (g) (iii) Light Industrial or Class B8 Storage or distribution space; Relocation of the single storey Gate House building; re-use of existing car parking and servicing areas to provide 80 surface level car parking spaces and 112 cycle space`. Amendments include revising the gatehouse design so that it features a slightly smaller footprint and can sit adjacent to the existing meter room; retaining the existing parking arrangement to the south of the gatehouse; relocating the covered cycle store for 4 bikes by the site entrance to the northern section of the front car park; reconfiguring the parking layout in the rear yard. **Approved 7/3/22**
- **Ref. No: 22/2966/NMA** Non-material amendments to planning permission reference 21/0332/FUL dated 20/09/2021 for 'Single storey front foyer extension of 49sqm and side extension of 147sqm to IBSA House building and sole use as Class E (g) (i) Office Space; Separate independent use of the former Printworks and existing factory buildings as Class E (g) (iii) Light Industrial or Class B8 Storage or distribution space; Relocation of the single storey Gate House building; re-use of existing car parking and servicing areas to provide 80 surface level car parking spaces and 112 cycle spaces.' Amendments include; Consolidation of all cycle parking spaces together in the northwest corner of the site; Reconfiguration of car parking layout; Car parking provision amended from 80 to 82; Electric car charging spaces amended from 16 to 11. **Approved 29/6/22**

2.20 The absence of progress of 19/6551/FUL, and the subsequent approvals for enhancement of and investment in the existing uses / operations on the site, which were to be demolished to make way for the residential proposed, suggests there is little intent of bringing the site forward for development.

2.21 The uncertainty of the delivery of this site, in combination with the lower delivery of Watchtower (see below) provide justification for the allocation of the Waitrose site, to achieve the required plan-led growth in the Mill Hill East area.

## **Site 49: Watch Tower House & Kingdom Hall**

2.22 In respect of Site 49: Watch Tower House & Kingdom Hall, the Council acknowledge that the site will not accommodate the 224 units forecast, and instead that the site is likely to now accommodate only a 9-unit affordable residential block on the site of the Kingdom Hall (Class C3), together with a 175-unit Specialist Older Persons Housing scheme on the site of Watch Tower House, incorporating a retained and extended Bittacy Cottage (Class C2).

2.23 It is noted that an application (referenced 22/0649/FUL) was reported to the Council's Strategic Planning Committee on 18th January 2023 (See agenda, reports and minutes); -. The committee resolved to approve the application. It is noted that the Council and

applicant are still in discussion over drafting of the Section 106 agreement. The Council consider that the site is deliverable, should a resolution to grant permission be made.

2.24 The site is located within the Mill Hill Conservation Area, and also falls within the Green Belt, with numerous TPO's and a Public Right of Way. Considering the significance of these policy constraints, the Council acknowledge the current indicative capacity of 224 units on this site is unrealistic and that the density proposed in the current application at the upper limits of what is acceptable. The Indicative Residential Capacity for the purposes of the Plan has therefore been revised downwards, from 224 to 184.

2.25 It is therefore pertinent:

- The planning application, if approved, will deliver 40 less units than forecast.
- The proposals are focussed on the 175 units for Specialist Older Persons Housing (Class C2).

2.26 The lower delivery of this site, in combination with its focus on specialist older person's housing provides further justification for the allocation of the Waitrose site, to achieve the required plan-led growth in the Mill Hill East area.

2.27 In considering the JLP site for a mixed residential allocation which would maintain the Waitrose food store and provide approximately 140 BTR homes on a podium above the car park, the site is:

- Suitable: The site falls within the defined Mill Hill East Centre, in an area of growth and adjacent to Allocation 47 in the BLP.
- Available: The site is immediately available and falls as one of the first sites to be progressed as part of the JLP BtR initiative.
- Achievable: JLP have confirmed the site can be delivered within the next 5 years.
- Deliverable: The John Lewis Partnership own the site, with no significant contractual or physical impediment to development. Whilst a gas line crosses the southern part of the site, a suitable scheme has been devised which avoids this being any impediment to development.

2.28 Given the above, JLP confirm the site can be delivered in years 1-5 of the BLP and that it can form an allocation for mixed use development within the BLP.

2.29 The Waitrose is located at a sustainable location within the Holders Hill Circus Local Centre, adjacent to Mill Hill East Station.

2.30 The Waitrose site is presently unallocated in the BLP, but adjacent to Site 47 (Appendix A) which comprises Mill Hill East Station and which is envisaged to deliver 127 units through redevelopment of airspace above and on land adjoining the station.

2.31 Mill Hill East has been the subject of significant development, which the BLP continues to support. Land to the north of the underground station, comprising former barracks and training centre, is subject to an Area Action Plan (AAP) for intensification for approximately 2,000 new homes and 500 jobs. This is presently under construction by Barratt, with an estimated 2,240 properties being developed in a phased manner alongside community facilities, including parks, open spaces and new primary school.

- 2.32 Unimplemented allocations in the AAP remain part of the Local Plan. POLICY GSS01 of the draft plan, in seeking delivery of ‘Sustainable Growth’ includes the provision of up to 1,500 homes in Mill Hill. BLP Policy GSS07 notes the growth of Mill Hill East and supports additional proposals on suitable sites to deliver further good suburban growth. Separately, para 4.24.7 / GSS09 notes Mill Hill East Station as an existing transport hub ‘offers significant potential for intensification and growth’.
- 2.33 Table 5 ‘New Homes Delivery’ supporting GSS07 foresees up to 1,500 new units over a 15-year period, with up to 1,200 of these being delivered in years 1-5 of the Plan.
- 2.34 The Waitrose could make a significant contribution to this further growth in years 1-5 of the Plan, helping make the Plan sound through the delivery of 140 units on a brownfield, sustainable and accessible location.
- 2.35 The allocation of the Waitrose site for residential development will achieve sustainable development under the terms of NPPF21 in achieving, overarching objectives of para 8:
- a) **An Economic Objective** – to help build a strong, responsive and competitive economic position for Mill Hill East, Holders Hill Circus Local Centre and the existing Waitrose to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure with further growth, utilising an existing and accessible brownfield site;
  - b) **A Social Objective** – to support strong, vibrant and healthy communities, by ensuring a sufficient number and range of homes, including BTR, can be provided to meet the needs of present and future generations linked with the existing services and infrastructure of Waitrose, Mill Hill East and the vitality and viability of the existing centre; and
  - c) **An Environmental Objective** – to utilise greater density of a brownfield site at an accessible location in order to protect and enhance more sensitive natural and historic environments and mitigating and adapting to climate change, including seeking net zero carbon in operation for the new homes and assisting in moving to a low carbon economy whereby development is located at accessible locations with existing nearby services and facilities.
- 2.36 We consider that the Waitrose Mill Hill site, including construction above its car park, will widen residential choice and can be included within the BLP and that such an allocation will help make the Plan sound, more effective and justified.

## 3.0 Conclusions

- 3.1 As part of a thorough review in the last 2.5 years JLP has put in place a Partnership Plan that seeks to restore profits. As part of this, the business is seeking to diversify from its retail core into the Build to Rent (BTR) market, aiming to deliver some 10,000 homes under its management in the next 10 years.
- 3.2 JLP wholly owns its Waitrose store at Mill Hill and proposes this store to be one of the first to be promoted for this exciting new BtR initiative.
- 3.3 Representations to the Reg.19 Draft Barnet Local Plan (BLP) have been duly made in support of a mixed-use residential allocation on the existing site of Waitrose Mill Hill, at 2 Langstone Way, Mill Hill, NW7 1GU.
- 3.4 The intention of The Partnership is to maintain its retail food store at Mill Hill East for Waitrose, to help sustain the local centre and serve the wider community, alongside the development of the site, including development above Waitrose's existing car park, for approximately 140 Build to Rent (BTR) residential homes. These homes will be developed and operated by JLP.
- 3.5 The timing of The Partnership's decisions to progress this opportunity meant that it was not possible to make representations on earlier versions of the emerging Plan, notably the Reg.18 documents.
- 3.6 However, subsequent to the making of Representations on the Reg.19 Plan, JLP and its advisors have had positive initial pre-application discussions with LBBC. There is also positive recognition that the site can add to growth in the Council's response to the Reg.19 Representations and in EXAM75, given the sites co-location with Site 47 (Mill Hill East Station).
- 3.7 Other allocations in the Mill Hill East Area (notably Site 46 and 49) have uncertainty over their delivery and/or will not deliver to the level previously forecast.
- 3.8 As a local centre well accessed by public transport, and as an accessible location supported by the BLP, London Plan and NPPF21, we consider the JLP site is highly appropriate for a mixed-use residential allocation.
- 3.9 We confirm that the site is suitable, available and achievable for residential development and deliverable within 1-5 years, i.e. during the first period of the Plan.
- 3.10 If there any comments or clarifications required on the points raised in these representations, then please contact Ian Anderson at [ian.anderson@lichfields.uk](mailto:ian.anderson@lichfields.uk) or 07947 362 618.

**Lichfields April 2023**

## **Appendix A: Emerging Barnet Plan, showing Growth Area, Allocations and Position of Waitrose Site**

Figure 3.1

### Map 3E Mill Hill East Area

