



Date: 26 April 2023
Our ref: TfL/TTLP/BH – Barnet Local Plan Examination
Your ref:

Transport for London
TTL Properties Limited

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By email: forward.planning@barnet.gov.uk and Nick.Lynch@barnet.gov.uk

Dear Nick,

BARNET LOCAL PLAN EXAMINATION IN PUBLIC – INSPECTOR LED CONSULTATION

Thank you for inviting us to comment on the Examination documents that the Council has prepared to address the Inspectors' requests set out within their Action Lists from each week of hearing sessions. These are:

EXAM11; EXAM13 to EXAM19; EXAM21; EXAM23 to EXAM40; EXAM42 to EXAM137

and additional / updated Statements of Common Ground:

EB_SoCG_07; EB_SoCG_18; EB_SoCG_19; and EB_SoCG_20.

We provide our comments on the documents that are relevant to our housing and commercial development programmes in the following pages. Our response refers to a number of submissions we have previously made in connection with the Local Plan Examination, including:

- Statement of Common Ground (EB_SoCG_14)
- TfL CD Reg 19 representations letter dated 6 August 2021
- Letter responding to Inspectors' Matters, Issues and Questions dated 6 September 2022
- Private and confidential letter on TfL TTLP homes programme capacity and timescales dated 30 November 2022
- Email setting out TfL TTLP site capacity and delivery for housing trajectory dated 20 December 2022

TTLP

As we explained in our Private and Confidential (P&C) letter of 30 November 2022 (setting out further details of our housing programme to assist you in compiling your housing trajectory), Transport for London (TfL) has set up a dedicated commercial property company, Transport Trading Limited Properties Limited (TTLP), to deliver housing and jobs in high demand areas and provide an increased revenue stream, and also to manage its commercial estate and undertake other development projects in London. TTLP has superseded TfL Commercial Development.

Please note that our response below is the view of TfL TTLP in its capacity as a significant landowner in the borough only and is separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

Concluding Remarks

We trust that our response is helpful to the Council and to the Examination Inspectors. If it would be helpful to discuss any of the issues we have raised or if any further clarification is needed, please do not hesitate to contact me.



Brendan Hodges
Acting Head of Planning
TTL Properties Limited, Transport for London

cc.

Ian Kemp -	EiP Programme Officer
Patricia Cazes-Potgieter -	TfL TTLP
Jonathan Cornelius -	TfL TTLP
Peter Elliot -	TfL TTLP
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Barnet Local Plan Examination in Public

TTL Properties Limited response to Inspector Led Consultation

Our comments are set out below, starting with the maps and followed by other EXAM docs that are relevant to our landownership and development projects.

EXAM 32 – Map 3C – Edgware Growth Area

We understand that a Statement of Common Ground (SoCG) with Barnet Council has been agreed and is to be signed imminently on behalf of our conditional Joint Venture (JV) with Ballymore for the development of the station and town centre sites (allocation Nos. 27 and 28). The SoCG identifies areas of agreement and disagreement between the parties with regards to the draft Local Plan, including the post EiP EXAM documents. Therefore, we rely on the SoCG for comments on this document.

EXAM 33 – Map 3D – Colindale Growth Area

For the reasons set out below (and expressed at the EiP), we consider that the Colindale Station site should be a site allocation. Given the critical role of the site in providing for the transport and access needs of the Growth Area, as well as its potential to deliver new homes and affordable housing, and upgrade Colindale Avenue, the Colindale Station site allocation should be annotated on the Growth Area map.

EXAM 34 – Map 3E – Mill Hill East Area

For the reasons set out below, we consider that allocation No. 47 (Mill Hill East Station) should be extended to include both 51 Bittacy Hill (located to the north of the railway tracks) and land in ownership of the John Lewis Partnership (JLP) to the south in order to enable a more comprehensive development opportunity. The map should reflect this. We have previously made submissions on these grounds including at the EiP and in our Private and Confidential (P&C) letter of 30 November 2022.

EXAM 14a – Theresa Villiers MP Statement

At High Barnet Station (allocation No. 44) the reduction in the number of commuter car parking spaces and the viability of development is queried.

TfL Spatial Planning address the development of station car parks in their response at paragraphs 9 to 13. We agree with their response and can confirm that the number of replacement commuter car parking spaces within a mixed-use scheme would be based on car park usage and user surveys, and the ability of existing users to transfer their journeys to the station to more sustainable public transport and active travel modes

(mainly walking and cycling). We will provide sufficient parking for people with disabilities.

We strongly believe that there is a viable housing-led, mixed-use scheme for this site. Our previous, prospective development partner withdrew in the early stages of the Covid pandemic as they realigned their business in London. We are now working with another prospective partner and have recommenced pre-application discussions with the Council for a scheme delivering a quantum of development which accords with the draft site allocation (Site 44). These discussions have been positive.

Exam 36 – LBB Note - Housing Numbers

Following the EiP hearings, we assisted the Council by providing further information in respect of the capacity and delivery of TfL / TTLP sites in our P&C letter of 30 November 2022 and email of 20 December 2022 with accompanying housing trajectory table. Based on this information we have the following comments in respect of housing numbers:

Edgware Policy GSS05 (page 7)

- *Site 27 – Edgware Town Centre:* Please see the Ballymore Group / TfL / Barnet Council SoCG for comments on this part of the policy.
- *Site 28 – Edgware Underground and Bus Stations:* Please see the Ballymore Group / TfL / Barnet Council SoCG for comments on this part of the policy.

Colindale Policy GSS06 (page 8)

- *Colindale Station:* Planning permission 19/0859/OUT has now expired and we are therefore seeking an allocation in the Local Plan for this site. The figure of 313 units is now correct (replacing the previous incorrect figure of 303) and we consider this remains achievable given the previously consented scheme for this number of homes.

Mill Hill East Policy GSS07 (page 9)

- *Site 47 – Mill Hill East Station:* We consider the Council's suggested capacity of 126 homes is an underestimate. As set out in our P&C letter of 30 November 2022, we consider that the allocation (plus 51 Bittacy Hill, which we have suggested should be included within the allocation) has the capacity for around 200 new homes, informed by what has been achieved at Millbrook Park, nearby. This could increase with the addition of the JLP land to this allocation.

Chipping Barnet Policy GSS08 (page 11)

- *Site 44 – High Barnet Station:* We agree with capacity for 293 new homes, which reflects positive discussions with the Council for redeveloping this site.

Finchley Central Church End Policy GSS08 (page 12)

- *Site 30 – Finchley Central Station:* The Council’s site capacity for 540 new homes is slightly below what we consider may be achievable (we have previously said approximately 550+), however, this is only a minor discrepancy. In EXAM 75 (Site Allocations) the Council refers to the site “*being able to accommodate 556 residential units*” (para 173).

East Finchley Policy GSS08 (page 15)

- *Site 24 – East Finchley Station car park:* We have not recently undertaken any feasibility work at this site and do not demur from the 135 homes capacity.
- *Site 25 – East Finchley substation:* This is a site formerly owned by TfL. We understand that a planning appeal has recently been allowed for mixed-use development including retail and offices and *nine* new homes. The permitted nine new homes provides a more realistic capacity than the 29 currently stated in EXAM 36. Please also see our comments on this site in respect of EXAM 75 below.

Whetstone Policy GSS08 (page 19)

- *Site 53 – Allum Way:* For the reasons set out in our P&C letter of 30 November 2022, we consider the 599 homes capacity to be a significant underestimate if train stabling is not required at this 4.27ha site with high PTAL. Recent discussions with planning officers suggest capacity for 700 – 800 new homes if stabling is not required.

Existing Public Transport Nodes Policy GSS09 (page 20)

- *Site 55 - Woodside Park Station East:* We consider the 96 homes capacity set out in EXAM36 to be the minimum for this site.
- *Site 56 - Woodside Park Station West:* For the reasons set out in our P&C letter of 30 November 2022, based on the site’s constraints, we consider that realistic site capacity here (including the 86 permitted homes already being built) would be 267 new homes (as opposed to 356 set out in EXAM36). Please note that planning permission 19/4293/FUL permits 86 self-contained flats (not 96 as stated in EXAM36); this is a Pocket Living, 100% affordable housing scheme on TfL land.

Major Thoroughfares Policy GSS11 (pages 22-23)

- *Site 31 – Brentmead Place:* We agree with capacity for approximately 46 new homes.
- *Site 50 – Watford Way:* We agree with capacity for approximately 105 new homes; however, given the size of the site, we would consider this to be a likely minimum.

- *Land West of Beechwood Avenue*: please note that this completed scheme on former TfL land has delivered 97 new homes as consented by planning permission 18/6355/FUL (not 87 units as stated in EXAM 36).

EXAM 51 – LBB Note on Affordable and Market Housing

Page 4: TTLP supports the Point 1 modification to para 4.4.5 with regards to making a clearer connection with meeting the Borough’s objectively assessed housing need and its ambition to meet and then exceed the London Plan housing target for the borough.

Pages 4 – 5: TTLP also supports the Point 2 modifications to policy HOU01 to bring affordable housing policy into line with the London Plan, including applying the Threshold Approach to Applications.

Page 6: We also support (and had previously requested) the additional clarification in paragraph 5.4.10, specifically the references to public land affordable housing portfolio agreements with the Mayor. This will assist TfL TTLP and other public land owners to optimise affordable housing provision on different sites to aid viability and deliverability of schemes across the portfolio and achieve the 50% affordable housing requirement.

Page 7: We support changes to paragraph 5.4.11, in particular the expectation that the percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. This accords with the London Plan.

Page 19: TTLP is happy with the Council’s policy GSS01 approach to Build to Rent (BtR) ie. following the approach set out in London Plan policy H11 – Build to Rent. We also concur with the Council’s view that this is a form of development / tenure that is particularly suited to higher density development within or on the edge of town centres or near transport nodes (paragraph 4.8.4A). The recognition that BtR can contribute to faster build out rates is also agreed.

Exam 57 – LBB Note on GSS11 Major Thoroughfares and GSS12 Redevelopment of Car Parks

Page 3: TTLP supports the new paragraph 4.26.7 additional references to the Healthy Streets approach and to significant improvements in air and noise quality as well as PTAL forming an important consideration in unlocking development opportunities along the TLRN / Major Thoroughfares. The recently completed Kuropatawa scheme at Edgewood Mews, on former TfL land adjacent to the A406, is an exemplar scheme in that respect. We also support the additional last paragraph to Policy GSS11 which covers the same ground.

EXAM 58 - REVISED Affordable Housing Delivery Table

We recognise that the Council has only assumed a 50% contribution to affordable housing from all sites in public ownership for the purposes of calculating the future

delivery of affordable homes in the borough. Nevertheless, for the avoidance of doubt, we confirm that all of the available TfL TTLP sites in the borough that are within the portfolio agreed with the Mayor will be capable of delivering between 35% and 100% affordable housing, subject to balancing our portfolio at 50%.

We have a number of comments on specific sites within Table AA. These are subject to the caveat above that 50% affordable housing is for the purposes of calculating overall affordable housing delivery only and that actual delivery on any one of our sites in the borough may vary between 35% and 100%.

- *Colindale Station*: the Council relies on the now expired 2020 planning permission. However, it makes the incorrect assumption that the scheme would deliver 145 new affordable homes. In fact the permission was for 313 new homes with 50% affordable housing and therefore the number of new affordable homes should be given as 156.
- *Site 25 – East Finchley substation*: The permission granted on appeal includes nine new homes within a mixed-use development. The number of new affordable homes should therefore be reduced to a maximum of five.
- *Sites 27 and 28 – Edgware Town Centre*: Please see the Ballymore Group / TfL / Barnet Council SoCG for comments on this.
- *Site 30 – Finchley Central Station*: While we are comfortable with the figure of 278 new affordable homes if the whole of the site was to be redeveloped (and 50% affordable provided – see caveat above), we note that it is inconsistent with the Exam 36 – Housing Numbers note (please see our comments above).
- *Land West of Beechwood Avenue*: This completed scheme on former TfL land has delivered 97 new homes as consented by planning permission 18/6355/FUL, 50% of which are affordable. The number of new affordable homes should therefore be increased to 48.
- *Site 31 – Brentmead Place*: We agree (subject to portfolio caveat above).
- *Site 44 – High Barnet Station*: We agree (subject to portfolio caveat above).
- *Site 47 – Mill Hill East Station*: As per our representations in respect of EXAM 36, we consider the Council's suggested capacity of 126 homes at this site to be an underestimate. On the basis we suggest above (200 homes), 50% affordable provision could amount to 100 new affordable homes at this site.
- *Site 50 – Watford Way*: We agree (subject to portfolio caveat above).
- *Site 53 – Allum Way*: Site allocation No. 53 combines three adjacent sites, only one of which is in public ownership (the land owned by TfL). Therefore, the expected % of affordable housing should not be 50%, but should be a blended figure. As per our representations in respect of EXAM 36, we consider the Council's suggested capacity of 599 homes to be an underestimate. In any case, Table AA sets a much lower figure of only 444 new homes (with 222 affordable). The number of new affordable homes estimated here should be calculated based on a blended % and consistent with EXAM 36 and also the

EXAM 86 updated Housing Trajectory and other relevant EiP / Local Plan documents.

- *Site 55 - Woodside Park Station East:* The estimated number of affordable homes delivered on this site (44) is inconsistent with EXAM 36, which says there is capacity for 96 homes (a figure that we consider could be exceeded).
- *Woodside Park Station West planning permission:* We agree; the site is currently being developed as 86 affordable homes (100%).
- *Site 56 - Woodside Park Station West:* For the reasons set out in our EXAM 36 representations above, we consider that the remainder of Site 56 has the capacity for 181 new homes (in addition to the 86 homes permitted and currently being built). Assuming 50% affordable provision, this part of the site could deliver 90 affordable homes (not 135).

We hope that these comments are helpful and that they will assist the Council in refining its calculation of the future delivery of affordable homes in the borough.

EXAM 75 – LBB Note on Site Allocations

We provide our comments in the order they are addressed in this document and discussed at the EiP hearings.

Site 27 - Edgware Town Centre (Edgware Growth Area)

Please see the Ballymore Group / TfL / Barnet Council SoCG for comments on this.

Site 28 - Edgware Underground & Bus Stations (Edgware Growth Area)

Please see the Ballymore Group / TfL / Barnet Council SoCG for comments on this.

Colindale Station

In their Week 4 Actions Note (EXAM 41), the Inspectors asked the Council to:

“Include consideration of TfL request for further allocation at Colindale station. Consider delivery and implications of infrastructure delivery options for plan.”

As the Council has pointed out, TfL has worked with them to secure Levelling Up funding which will be combined with S106 monies to enable us to deliver the new station building and step free access. Both parties agree that the station works can be delivered via transport-related Permitted Development Rights.

However, this site will not only deliver new and improved transport infrastructure. In addition to the station, both the Council and TfL also wish to see adjoining land comprehensively redeveloped to deliver new homes in an accessible and sustainable location, and also to provide an improved townscape and public realm setting for Colindale Avenue which links different parts of the Colindale Action Area. The Council’s aspirations for this site include redevelopment up to the corner with Pasteur

Close and achieving this will require acquisition of third party land, potentially requiring Compulsory Purchase Order (CPO).

The Council has not allocated this site, principally on the basis that “... given the existence of the outline planning consent (19/0859/OUT), the site does not merit a specific allocation within the Local Plan, as there are sufficient residential numbers provided by the current schedule of site proposals”. However, this is no longer the case; it important to note that this planning permission, dated 10 March 2020, has now expired and is no longer extant.

The Council has reiterated its ambition to meet and then exceed the London Plan housing target for the borough (please see modifications to paragraph 4.4.5 and page 4 of EXAM 51). To achieve this, the Council relies on planning permissions and allocated sites. The 10 March 2020 Colindale planning permission is relied upon to meet the Council’s targets for housing and affordable housing delivery in the draft Local Plan and a number of EiP documents including EXAM 51 (LBB Note on Affordable and Market Housing), EXAM 58 (Revised Affordable Housing Delivery table) and EXAM 87 (Revised Housing Trajectory). Now that the planning permission has expired, it is essential for the site to be allocated as it is an important component of the Local Plan’s housing supply and housing trajectory which is capable of delivering 50% affordable housing.

In the context of the potential need for CPO, the NPPF is clear that LPAs should take a proactive role in identifying land to meet development needs and assist in land assembly. Paragraph 35 says:

“Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.”

We ask the Council to take this pro-active approach in order to identify this land in the Local Plan as suitable for meeting the borough’s development needs.

Although the Council has adopted the Colindale Underground Station Supplementary Planning Document (SPD) we consider that it would help to strengthen the planning position, including CPO, if the site benefitted from the additional weight that can be accorded to a site allocation within the adopted Local Plan. In our view, this should reflect the site and capacity of development that has been granted planning permission.

Our position on this has also previously been set out in our Reg 19 representations (letter dated 6 August 2019), responses to Inspectors’ Matters, Issues and Questions (letter dated 6 September 2022, also including a proposed site allocation boundary

plan), information on the TfL TTLP homes programme capacity and timescales (P&C letter dated 30 November 2022) and in evidence given at the EiP.

Site 24 - East Finchley station car park

The Council suggests adding a requirement / guideline to mitigate the loss of the existing community garden through equivalent or improved re-provision.

As explained at the EiP, the community garden is located outside of the site allocation boundary and we have no intention to remove or disturb it. Therefore we suggest a small amendment (additional / altered text in red):

If development extends beyond the allocation boundary, proposals should protect ~~mitigate the loss of~~ the existing community garden or mitigate its loss through equivalent or improved re-provision, that is accessible to the community.

Site 25: East Finchley Substation

As above, we understand that the mixed-use scheme which could deliver nine homes as part of a retail and office scheme has been allowed on appeal. However, we agree with the Council that this would not preclude future schemes coming forward with a greater level of residential provision than the appeal scheme.

Site 30: Finchley Central Station (Finchley Central/ Church End Town Centre)

The Inspectors asked the Council to:

“Liaise with TfL regarding the design led approach that has informed calculation of the unit number and clarify the intended distribution of development across different parts of the site. Consider whether assumptions achievable. Review boundary to the site to ensure roadway running between west and east is included. Consider whether suitable for Very Tall buildings. Consider whether amendment required to remove text in brackets from MM359.”

We agree that the site boundary plan should be amended to include Regents Park Road / Ballards lane running between the east and west sections of the site.

We also support the removal of the text in brackets from MM359.

The Council has not provided any further consideration of whether the site is suitable for Very Tall Buildings. We maintain our contention that the site allocation should be sufficiently flexible to enable the possible provision of both tall and very tall buildings that may be required to achieve the allocated density of development and for a viable scheme. Please see our representations on this matter in our Reg 19 representations letter (6 August 2021) and particularly in our letter responding to Inspectors' Matters, Issues and Questions dated 6 September 2022 (page 9).

Site 55: Woodside Park Station East

The Inspectors asked the Council to:

“Liaise with TfL on any design led work that informed capacity. Further justification for allocation, assumptions and deliverability required. Clarify any relationship with the planning permission 19/4293/FUL (southern part of site 56).”

We note a minor discrepancy in the indicative site capacity which is given as 95 homes here but 96 in EXAM 36. We note the Council’s comments on capacity and would simply say that we / our partner / appointed developer will prepare a scheme which optimises the potential of the site in relation to the local context.

Site 56 - Woodside Park Station West

The Inspectors asked the Council to:

“provide further justification on development and assumptions of northern part, liaising with TfL on early design work to mitigate any impacts to trees and access, including the footbridge over the Northern line.”

We agree the Council’s overall capacity of 270 homes for this site allocation (86 already permitted plus a further 184 on vacant land to the north). This accords with our P&C letter of 30 November 2022 and email of 20 December 2022. We also agree the other suggested modifications to the development guidelines in terms of loss of trees and mitigation. The Council’s comments on access and potential modifications to the footbridge stairs are correct.

Please note that the capacity of this site allocation needs to be updated in EXAM 36 to be consistent with this document.

Site 44: High Barnet Station (Chipping Barnet Town Centre)

The Inspectors asked the Council to:

“Resolve rounding issue. Liaise with TfL on early design work informing capacity, provide justification for the 1-5 year time period or consider modifications.”

We do not consider the difference between the 292 and 293 homes capacity to be material and have no view either way. However, we would suggest that it should be consistent with EXAM 36. While we intend to secure planning permission for redevelopment of this site within the five year timeframe, we cannot be sure that it would be completed within that timescale; accordingly we do not demure from the suggested 6 – 10 years timeframe.

Site 47: Mill Hill East Station

The Inspectors asked the Council to:

MAYOR OF LONDON

“Resolve rounding issue. Provide commentary regarding appropriate building heights and the surrounding context. Check boundary of Map 3E in Exam 34 with regards to Waitrose and reflect on extent of that boundary and potential to make reference to adjoining site as part of a more comprehensive development.”

The Council has not addressed the rounding issue. We maintain that the Council’s suggested capacity of 130 homes is an underestimate. As set out in our P&C letter of 30 November 2022, we consider that the allocation (plus 51 Bittacy Hill, which we have suggested should be included within the allocation) has the capacity for around 200 new homes, informed by what has been achieved at Millbrook Park, nearby. This could increase with the addition of the Waitrose / John Lewis Partnership (JLP) land to this allocation. Site capacity in this document should be consistent with EXAM 36.

Referring to the site allocation boundary, we said at the EiP, and in our P&C letter of 30 November 2022 that we would support the extension of the southern suite allocation boundary to include the Waitrose / JLP site as it would enable comprehensive redevelopment south of the railway. If that is not possible, we agree the additional text is:

“Consideration should be given to whether there is an opportunity for the site to be redeveloped comprehensively with the neighbouring site occupied by Waitrose, to optimise the density and delivery of services and facilities for existing and future residents.”

As previously set out at the EiP and in our P&C letter of 30 November 2022, we maintain that 51 Bittacy Hill should be included within the site allocation boundary to the north of the railway to enable comprehensive redevelopment, including greater flexibility for accommodating buses (should there be a requirement) and improved frontage to the main road.

We consider that the reference to mature trees in the site allocation should be consistent with eg. Site 56: Woodside Park Station West. Therefore we suggest that the proposed wording:

“Preservation of mature trees is required.”

is replaced by:

The impact of the loss of mature trees must be mitigated. Where retention or equivalent replacement cannot be achieved on site, then financial and/or non-financial contributions may be required to ensure that equivalent replanting is achieved nearby.

We comment on the EXAM 34 map above.

Site 50: Watford Way & Bunns Lane (Major Thoroughfare)

The Inspectors asked the Council to:

MAYOR OF LONDON

“Provide justification for the site’s deliverability, particularly in view of the access issues. Clarify what the access solution could be to make the site developable.”

In terms of access to this site, there is also a possible third option. This would involve a new entrance from Bunns Lane via a new roadway on land believed to be owned by the Department for Transport beneath the A1 Watford Way ‘flyover’. To provide necessary flexibility for delivery, this option should also be referred to in the site allocation. We suggest the following changes (suggested additional text in red):

Proposals must demonstrate how adequate access to site will be secured. Possible accesses should be explored from: Bunns Lane, through the garage site adjacent to 19-24 Farm House Court; **from Bunns Lane travelling beneath the A1 Watford Way ‘flyover’**; and/or from Brancaster Drive.

Site 53: Allum Way (Whetstone Town Centre)

The Inspectors asked the Council to:

“Clarify wording regarding guidance on building heights. Consider whether need for operational infrastructure should be based on more conservative figure. Scenario setting could provide context for any future opportunities to increase capacities if infrastructure not needed.”

As we have set out above, for the reasons set out in our P&C letter of 30 November 2022, we consider the 599 homes capacity to be a significant underestimate if train stabling is not required at this 4.27ha site with high PTAL. Recent discussions with planning officers suggest capacity for 700 – 800 if stabling is not required. We have no further comments on revised main modification MM376.

EXAM 87 – Revised Housing Trajectory 2

The housing trajectory as it relates to TTLP sites is in general accordance with the figures and delivery timings set out in our email dated 20 December 2022 and the attachment table. The exceptions to this are:

- *Site 47 - Mill Hill East Station:* As above we consider this site to have the capacity for 200 new homes (not 135).
- *Site 50 – Watford Way & Bunns Lane:* We consider that development could be brought forward on this site within a ten years timeframe (not 15). It is within our housing programme of sites on which we will start the construction of 20,000 new homes within the next eight years.