

Matter 10 Written Statement – Victor Montefiore (96)

In respect of proposed modification number MM372 relating to site 49, Watchtower House & Kingdom Hall:

“Area of existing buildings redeveloped for residential with supporting community uses while the site maintains the essential characteristics of the Green Belt, including retaining the areas of undeveloped land.”

There are many essential characteristics of the Green Belt, but only ‘retaining the areas of undeveloped land’ is made explicit. I would argue that **openness** is another essential characteristic as indicated by Inspector’s question 5b (under Matter 5). Why is openness important? It is important at this site because the site contains an extensive proportion of *hard landscaping* which a current planning applicant claims is developed land (rather than undeveloped land)*.

For the modification to be **balanced** it needs to explicitly address the essential characteristic of openness. Therefore the modification should read:

“Area of existing buildings redeveloped for residential with supporting community uses while the site maintains the essential characteristics of the Green Belt, including openness and retaining the areas of undeveloped land.”

I also disagree with the ‘LBB Response and action’ to the following point relating to Policy GSS07 (Mill Hill East):

“Policy’s housing numbers should be revised based on Barnet’s commitment to the GLA that “Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt”

Response:

“The Council considers that it has undertaken a proportionate and realistic approach to assessing site capacity. Indicative capacities within proposals are intended as high-level assessments that will be firmed up by further design and master planning work as proposals transition to planning applications. Carrying out a full design-led site assessment at the allocation stage would be disproportionately resource intensive and lead to less flexibility.”

The reason is that there is absolutely no way that this site can deliver the 224 of units indicated (even the current applicant is targeting significantly less than that number [175] through **increasing** the building volume by 94.2% [i.e. nearly **doubling**]). The council has not taken a ‘*proportionate and realistic approach to assessing site capacity*’ – they have been extremely lazy and just extracted a number out of a table.

The implication of this lazy approach is that the number of 1,500 homes in GSS07 is overstated by around 100 and by implication the number of homes in GSS01 is also overstated.

I would also be grateful if the Inspectors could **visit the site**, given that the signposting document (section 4.8) says that it is one of the ‘*most contentious sites*’.

*See application 22/0649/FUL, Planning Statement Part 1, map on page 105 'Existing Site Area Plan' which claims that 23.8% of the land is developed on the eastern parcel, when hard landscaping is about two thirds of that.

