

PLANNING BRIEF

National Institute of Medical Research, Mill Hill

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Introduction

Purpose of the Planning Brief

- 1.1 This Planning Brief has been formulated to provide the planning framework for the re-use and redevelopment of the National Institute of Medical Research (NIMR) site.
- 1.2 The NIMR is situated to the north of The Ridgeway in Mill Hill, in the London Borough of Barnet. The NIMR site is located in the Green Belt and also within the Mill Hill Conservation Area. It is also within the area to be included within the Mill Hill Neighbourhood Plan.
- 1.3 The site is due to be vacated in 2017, when the NIMR relocates to the new Francis Crick Institute at St Pancras.
- 1.4 There is a significant opportunity to transform the site into a residential-led, mixed use development that is sensitive to and enhances its surroundings and is planning policy compliant.
- 1.5 While this site represents opportunities it is also affected by a wide range of constraints, including the Green Belt and the Conservation Area.
- 1.6 A Planning Brief is therefore considered to be the most appropriate vehicle for providing the necessary framework to enable the site to be brought forward for development that provides certainty, guides the developer and is robust enough to defend any decision of the Council.
- 1.7 This Planning Brief sets out the key parameters to consider in determining the future of the site reflecting existing policies, the Green Belt and Conservation Area, and its existing role as a major source of employment. This is presented together with the opportunities it provides for the delivery of housing and new employment space that supports the needs of modern businesses.

Objectives for the NIMR site

- 1.8 The objectives for the site are:
 - To deliver a high quality residential-led mixed used development comprising a range of housing types and tenures, including family homes;
 - To ensure the positive management of the Green Belt, by maintaining openness, as well as seeking to enhance biodiversity and improving access to opportunities for outdoor sport and recreation;
 - To preserve or enhance its contribution to the character and appearance of the Mill Hill Conservation Area;
 - To provide opportunities for employment creation, ensuring the continued contribution to innovation and growth through provision of workspace for small to medium enterprises; and
 - To ensure any new development is of the highest design and environmental standards and appropriate in scale and siting.
- 1.9 In order to deliver these objectives the re-use and redevelopment of the NIMR site presents a number of opportunities. These include :

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- Provision of new floorspace for Employment – B1(a) Offices or B1b (Research and Development)
- Introduction of new uses including :
 - Residential – C3
 - Small scale retail - A1 (Shops) or A3 (Restaurant and Cafe)
- Provision for new Open Space and Sport and Recreation
- Non-residential floorspace should be located in the higher density heart of the development. It should be positioned on the lower levels of buildings in order to create active frontages;
- Positive management of the Green Belt to provide improvements in overall quality and accessibility;
- A strategic contribution towards housing delivery in Barnet. The size of the site will ensure steady delivery of housing over the medium term;
- The development should not result in a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development, unless very special circumstances are demonstrated;
- The development should not adversely impact on the Conservation Area and adjoining residential amenity
- The development should seek to take advantage of the topography and the landscaping so that, with the exception of the Main Building, development nestles within the existing and enhanced landscaping;
- To improve, retain, re-use or re-build as per the original the distinctive Main Building, in whole or part;
- The existing large number of trees present throughout the site can play an important role in screening proposed buildings as well as adding amenity value and character to the development;
- New employment space meeting the needs of modern businesses in particular small to medium enterprises;
- The removal of security fencing is an opportunity to improve public access to the Green Belt. Improvements to the quality of the existing public right of way can make it more accessible;
- Improved accessibility to the sports pitches and pavilion.
- The Council would seek the continuation and improvement of the sports pitches to form part of the cluster with the adjoining pitches;

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- The enhancement of biodiversity through sensitive landscaping, the creation of new natural water features (as part of a SUDS network) and the creation of informal public parkland through the enhancement of the copse, glades and meadows within the site;
- Improving public access and pathways from The Ridgeway and Burtonhole Lane will provide an opportunity for the site to be a gateway to the Totteridge Valley and increase accessibility to the countryside and the Green Belt;
- Innovative forms of public art to mark the scientific advances at Mill Hill over the last 65 years.

2 The Existing Site

Site History

- 2.1 The Medical Research Council (MRC) was formed in 1913 and established its facilities in Hampstead. It soon afterwards established the National Institute for Medical Research.
- 2.2 In 1922 the MRC purchased 15 hectares of the Rhodes Farm at Mill Hill in order to support its existing laboratory facilities in Hampstead. In the 1930s it was recognised that the MRC had outgrown its Hampstead location. It therefore took the decision to move to Mill Hill.
- 2.3 Construction of the Main Building commenced in 1937. Designed by Maxwell Ayrton, the architect of the original Wembley Stadium, the Main Building was not occupied by the MRC until 1949, having served as a base for the Women's Royal Naval Service during the Second World War.
- 2.4 The NIMR changed its name to the Francis Crick Institute in 2015 and Mill Hill became one of the new Institute's campuses. The evolution of the existing site now known as the National Institute of Medical Research can be summarised in three key periods of development:

Phase 1 Early buildings completed in the 1920s and 1930s (buildings mainly to the west of the site) including the Stroud and Laboratories site, as shown in Figure 1 below.

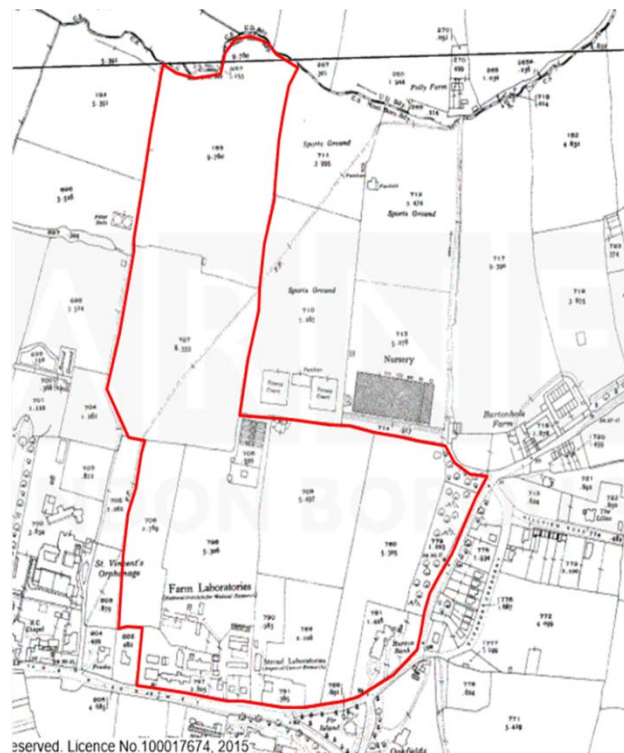


Figure 1. 1935 OS map showing early buildings that existed on the site.

Phase 2 Centred around the Main Building. These were completed between the late 1930s and 1950 to replace the Stroud Laboratories, as shown in Figure 2 below.

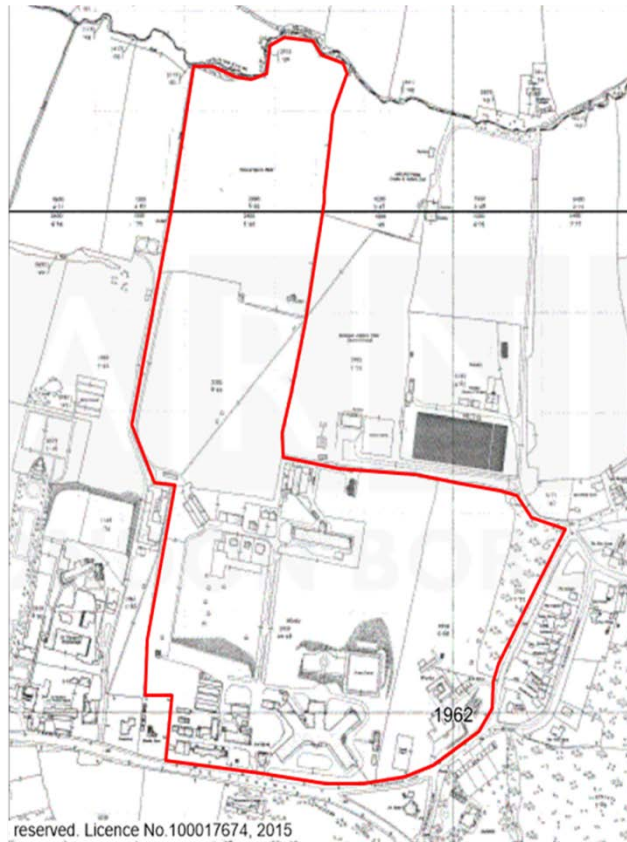


Figure 2 1962 OS map

Phase 3 Expansion in late 1960s early 1970s with new car parks and extensions to existing buildings, as shown in Figure 3 below.



Figure 3 Current Site

- 2.5 Collectively these buildings represent approximately 42,000 m² of development. Therefore, there is significant scope for the re-use and redevelopment of the site within the Green Belt and Conservation Area.
- 2.6 The NIMR is one of the world's leading centres for medical research. Throughout the Main Building there are many plaques, awards (including Nobel Awards), and displays marking medical research achievements over the last 60 years. Whilst these are likely to be relocated to the new Francis Crick Institute at St Pancras, the Council is keen to ensure that any new development respects that history and incorporates within the scheme markers to the past. This could be in the form of, public art, retention of buildings and other features, street and building naming and plaques.

Current land uses

- 2.7 The site is primarily used for research and development purposes (use class B1(b)). The site also includes offices, and residential accommodation (used for the housing of students based on the site), associated car parking, storage and open space.
- 2.8 The NIMR will vacate the site in 2017. Following a competitive tender process, Barratt London have entered into an agreement to acquire the site from the MRC.
- 2.9 Topographically the site varies greatly from north to south with a 20-25 metre fall which splits the land use into two distinct areas, as shown on Figure 4 below:
- the southern element fronting The Ridgeway and part of Burtonhole Lane, contains the majority of buildings in two clusters, together with areas of hardstanding, formal landscaping fronting the Main Building and a wooded area between the Main Building and the buildings off Burtonhole Lane. This area consists of over 30 different buildings, including the Main Building, and is the main area used for research and development; and
 - the northern part of the site largely consists of open space which is used for sport and recreational purposes, currently, by MRC employees. There are in this area, however, a number of low rise ancillary buildings, together with six houses, which have a rural character. The open space in the northern section extends into the Totteridge Valley and comprises informal grassland (the Meadow) and playing pitches. The playing pitches are currently private, and adjoin Council owned pitches at the Mill Hill Sports Club.

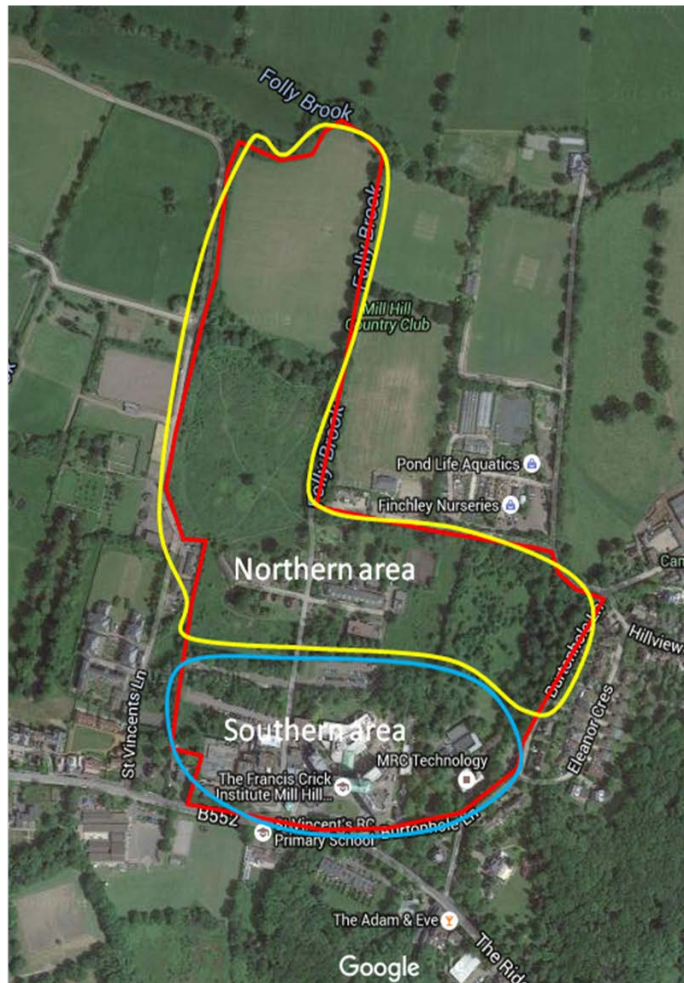


Figure 4 Northern and Southern Areas

- 2.10 The MRC has been a significant employer within Barnet, employing some 600 staff. The current uses at the site include employment falling within use class B1 a (offices) and B1b (Research and Development).
- 2.11 Car parking provision on the site of around 400 spaces reflects these employment levels. Spaces are located throughout the site, with three large surface level car parks between The Ridgeway and Valley clusters. In addition, there are ad hoc spaces around the perimeter of various buildings.
- 2.12 The open spaces on the site comprise a mix of playing pitches, a meadow, woodlands/copse, glades and formal open space around the buildings. The site is extensively landscaped with dense tree coverage in parts, which help screen the existing development from the Totteridge Valley and other view points.

Location of Buildings

- 2.13 The existing buildings are located in three main clusters as shown in Figure 5 below. These are :

The Ridgeway Cluster

The largest cluster, containing the Main Building fronts The Ridgeway. To the west is a group of low rise research laboratories and storage facilities. Adjoining the Main Building to the north are three storey laboratories and training facilities, with car parking.

The Burtonhole Lane Cluster

This includes the current Medical Research Centre Technology (MRCT) facility and consists of a three storey research centre, together with single and two storey buildings.

The Valley Cluster

This cluster contains a number of buildings, including four detached and two semi-detached two-storey cottages, storage buildings and a stable block. It also contains two to three storey laboratories with associated high security fencing.



Figure 5 Site Clusters

2.14 The Main Building on the site is an imposing ninestorey brick block with four splayed wings of four and five storeys. The building is neither statutorily nor locally listed. It is identified as a Tall Building in the Local Plan Core Strategy – Map 8. and in the Council’s Tall Buildings Study and is defined as an existing Tall Building. Various extensions have been added, together with external additions which include air conditioning, flues, fire escapes

and other equipment essential for the safety and comfort of the building occupants. The building has touches of art deco architecture, with an imposing art deco entrance hall. A later extension the Fletcher Memorial Hall to the rear of the Main Building is also in the art deco style. The Main Building is the most visible building on the site and can be seen from long distance viewpoints. The upper floors offer excellent views in all directions.

- 2.15 Other buildings have been added to the site over a 60-year period to accommodate the needs and changing requirements of the NIMR. These are generally between one and three storeys and nestle within the tree canopy.
- 2.16 The buildings on site contain approximately 42,000 m² gross floorspace accommodation, comprising a range of laboratory and research facilities, offices, residential accommodation and social facilities. As it has not been possible to survey all of the buildings, the Council has not been able establish the precise floorspace figures, both net and gross.

3 Planning Policy Framework

- 3.1 The Barnet statutory development plan is the 2012 Local Plan Core Strategy and Development Management Policies, alongside the 2015 London Plan (consolidated with alterations since 2011). Regard has to be had to the National Planning Policy Framework (NPPF) in decision making.
- 3.2 In the Barnet Local Plan the site is identified as being within the Green Belt and the Mill Hill Conservation Area.
- 3.3 The site is within the Mill Hill Neighbourhood Plan Area. The Mill Hill Neighbourhood Forum is in the early stages of producing a Neighbourhood Plan. The emerging Mill Hill Neighbourhood Plan will, subject to adoption eventually form part of Barnet's development plan. Should this be in place when an application is considered it will be a material consideration.
- 3.4 Rather than repeat these policies as part of the Brief a Planning Policy Matrix has been produced to highlight the main planning issues for consideration and enable cross-reference to relevant parts of the Local Plan, London Plan and the National Planning Policy Framework (NPPF). The Matrix is set out in **Appendix 1**. When considering the requirements of policies on employment issues it will be important to also recognise the objectives of other areas of policy in an interrelated manner, rather than look at an issue in isolation. These could include Green Belt, heritage, biodiversity, transport and design matters.

National Planning Policy Framework

- 3.5 As a Green Belt site any proposal must take account of national policy as set out in the National Planning Policy Framework.
- 3.6 The Green Belt is one of the most significant and enduring national planning policies, and the Government, Greater London Authority and London Borough of Barnet attach great importance to it and regard any new development within the Green Belt to be against the policies set out in paragraphs 79 to 92 of the NPPF. It is not the purpose of the Brief to repeat verbatim those policies, but to highlight the issues that they raise with regard to the re-use and redevelopment of this site.
- 3.7 The fundamental aim of the Green Belt is to restrict urban sprawl and maintain permanent openness of land within the Green Belt. The boundaries of the Green Belt are established through the local plan process, and therefore any development on this site will not automatically give rise to a change in the Green Belt boundary nor be considered as having taken land out of the Green Belt. Therefore, permanency of the Green Belt is maintained.
- 3.8 There are two principles in the NPPF which development of this site needs to address:
- a That the development does not have a greater impact on the five purposes of the Green Belt as set out in paragraph 80 of the NPPF. The Council has had regard to those purposes and considers that the development along the principles established in this Planning Brief will not result in unrestricted sprawl of urban area; will not merge neighbouring settlements; will safeguard countryside (and in fact bring countryside into public use); will preserve and enhance the special character of the historic area of Mill

Hill; and will assist in urban regeneration, by retaining a significant site in productive use and help support regeneration in Mill Hill through the provision of new homes, employment and recreation facilities.

- b The development will fulfil the objectives of paragraph 81 of the NPPF by securing an opportunity to provide public access to the countryside (within the site and as a gateway to the Totteridge Valley beyond, as part of a wider regional park for north west London as promoted in the London Plan) and outdoor sport and recreation. It will also enhance the landscape, visual amenity and increase biodiversity. Furthermore, the redevelopment will ensure that the soon to be vacated site will not encourage dereliction.

- 3.9 The NPPF addresses the issue of appropriate development in the Green Belt in Paragraph 89 which inter alia, defines as an exception to inappropriate development:

'Limited infill or partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continued use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.'

- 3.10 The development principles of this Brief take account of the need to protect openness and to respect the objectives of the Green Belt. This Brief addresses this point. The proposals the Council is setting out make use of a brownfield site and in such a way that does not have a greater impact on the Green Belt. It does this in two ways: firstly, by restricting all new development to the Ridgeway Cluster and Burtonhole Lane Cluster (see Figure 7), it clears the northern section of all existing buildings (although the retention and conversion of one building for a visitors centre may be allowable). This enhances the openness of the Green Belt. Secondly, it enables the site to be designed, re-sculptured and enhanced by fresh landscaping and in a setting which promotes openness, permeability and a mix of uses complementary to its setting and the Green Belt.

- 3.11 Any future proposal will need to demonstrate that the location and scale of new buildings will not have a greater impact on the openness of the Green Belt. To enable the Council to assess the proposals against national Green Belt policy and guidance the following information should be submitted in support of the application:

- existing and proposed floorspace/volume including net to gross ratio (including net and gross in so far as possible and how mix influences floorspace);
- existing and proposed building heights;
- existing and proposed extent of Development Land (buildings and hardstandings separated) measured in accordance with NPPF Annex 2; and
- existing and proposed building footprint.

- 3.12 Based on the provision of this information, the following assessments will need to be made:

- an assessment of the distribution of built development across the site , and how it will be contained;
- an assessment of the extent of public accessibility and permeability;

- an assessment of existing and proposed views into the site from the agreed view points (short, medium and long distance views from public view points on the Ridgeway and from Totteridge Valley;
- an assessment of agreed views through the site from the Ridgeway and other publicly accessible view points;
- a Landscape and Visual Impact Assessment;
- an assessment of the defensible boundary of built development and a description of how this will be maintained to protect the Green Belt from encroachment;
- an assessment of the impact of the proposals, (if any, positive and negative) on the functions of the Green Belt), including a description of proposals to ensure measures to protect and enhance the Green Belt are managed in the long term. This should include recreation, community uses, biodiversity and landscape quality; and
- details of any special circumstances that should be taken into account in the event of any conflict with the policy and guidance.

Barnet Local Plan

- 3.13 The key policy issues relevant to the site are Green Belt, Employment, Housing Delivery, Heritage and Landscape Character, Parking and Access, Biodiversity and Sustainability.

Green Belt

- 3.14 The requirements of planning policies on the Green Belt are likely to be a particularly key issue for many of the types of scheme that could be proposed at the site. When considering any proposal the starting point for the Council is the adopted development plan. In terms of the London Plan the key policy on this matter is Policy 7.16 (Green Belt). In respect of planning decisions (section B), this policy sets out that:

'The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.'

- 3.15 In terms of the Barnet Local Plan the main relevant policies are CS7 (Enhancing and protecting Barnet's open spaces) and DM15 (Green Belt and Open Spaces).
- 3.16 Policy DM15 in particular sets out both the Council's general approach to development in the Green Belt and specific requirements in respect of particular types of development. It reinforces the NPPF and in particular states that *'The replacement or re-use of buildings will not be permitted where they would have an adverse impact on the openness of the area or the purposes of including land in Green Belt.'*

Employment

- 3.17 The NIMR is a significant source of employment in Barnet. It is inevitable that there will be a significant reduction in employment on the site. The proposals will need to appropriately address the requirements of Barnet Local Plan policies CS8 (Promoting a strong and prosperous Barnet) and DM14 (New and existing employment space).
- 3.18 Policy DM14 identifies specific conditions to be met before the loss of B class use floorspace will be permitted. These include:

- evidence that the site is no longer suitable and viable for its existing or alternative business use in the short, medium and long term;
 - evidence that a suitable period of effective marketing has been undertaken.
- 3.19 Where reduction in employment use is acceptable Barnet Local Plan policies identify that the priority for re-use will be a mixture of small business units with residential uses. They also make it clear that proposals will be expected to provide mitigation in the form of contributions to skills, employment, enterprise and training in such circumstances.
- 3.20 In this instance, the Council accepts that given the sites location and the locational demands for businesses seeking to expand or relocate within Barnet, it would be difficult to redevelop the site solely for employment uses. Therefore, the Council accepts that there will be a loss of employment.
- 3.21 However, some employment on the site is considered viable. In order to identify the type and quantity of employment generating uses that are considered to be viable and deliverable on the site the Council will require an Employment Study to assess the potential for modern business uses as an element of the scheme in the short, medium and long term. The scope of works for the Employment Study should set out the existing context of the NIMR site and include an assessment of supply and demand for employment accommodation in Barnet, the wider sub-region and London. The Employment Study should provide an overview of recent marketing activity undertaken, analysis of business accommodation requirements; liaison with commercial agents and review of existing demand, recent market transactions and consideration of opportunities for new employment growth sectors within Barnet. This should consider potential for creative industries (including arts, technology, crafts and design) as well as more traditional professional areas of business services to locate in the new development.
- 3.22 Subject to the findings of the Employment Study the Council will expect the development to seek to provide at least 2,000m² of employment space for B1(a) and B1(b) uses. These uses can be properly integrated into the new development through re-use of existing buildings, such as the lower floors of the Main Building or the building/s in the Burtonhole Lane Cluster. Other employment uses, such as B1(c), B2 to B8, will not be acceptable due to traffic generation, the need for large HGV turning areas, outside storage, signage and building design.

Housing Delivery

- 3.23 The following Barnet Local Plan housing policies apply:

Policy CS4 - Providing quality homes and housing choice in Barnet

Affordable Housing should be provided in line with the Council's strategic borough-wide target of 40% provision, subject to viability, for all new homes with a tenure mix of 60% social rented and 40% intermediate. In accordance with the London Plan, affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate, it may be provided off-site.

Any affordable housing proposal which does not meet the Council's policy will need to be supported by a Viability Assessment. The Council expects the developer to enter into dialogue regarding the proposed level of affordable housing to be provided prior to the submission of a planning application and after the Council has been supplied with

sufficient detail of the proposed scheme so that it can carry out its own assessment. This will help agree the assumptions to be included in a viability assessment reach an early agreement on the level of provision and avoid a protracted S106 negotiation.

Policy DM08 – Ensuring a variety of sizes of new homes to meet housing need

The development should include a mix of residential units. Maintaining and increasing the supply of family housing is a priority in Barnet. Barnet's Housing Strategy 2015 recognises the markets pre-disposition to provide 1 and 2 bedroom units, and maintains the priority for family homes across all tenures.

Heritage and Landscape Character

3.24 Figure 6 shows that the site is partially within the Mill Hill Conservation Area. A Character Appraisal was adopted for this area in 2008.

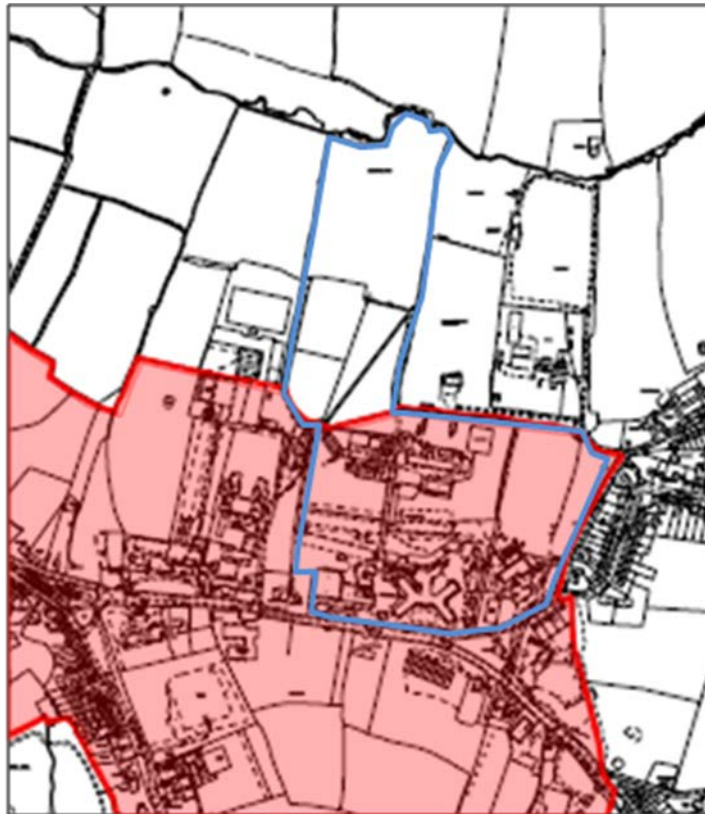


Figure 6: Site in relation to eastern part of Mill Hill Conservation Area (shown in red)

3.25 The key conservation and heritage policies in the Barnet Core Strategy and Development Management Policies document are CS5 (Protecting and enhancing Barnet's character to create high quality places), DMO1 (Protecting Barnet's character and amenity) and DM06 (Barnet's Heritage and Conservation). Policies 7.2 (An Inclusive Environment), 7.4 (Local character), 7.6 (Architecture) and 7.8 (Heritage Assets and Archaeology) are the main policies in the London Plan on this matter applicable to the development of this site.

3.26 Any proposal will need to carefully address the requirements of these policies. This includes protecting heritage assets in line with their significance and preserving or enhancing the character and appearance of the Conservation Area. An assessment of impact on heritage

assets should accompany any application. This includes a heritage based evaluation of all buildings proposed for demolition or alteration.

- 3.27 Any proposal will need to ensure it takes account of design, character and amenity matters set out in the Development Plan to ensure that the highest standards of design are achieved.
- 3.28 The Mill Hill Conservation Area covers an area of 152 hectares, extending from Burtonhole Lane in the south-east to Highwood Hill in the north-west. The topography of the area is one of the conservation area's most notable features and has significantly shaped the way in which the area has developed. Development is primarily focused on the high gravel ridge that runs on an east-west axis through the conservation area i.e. The Ridgeway.
- 3.29 Areas of Special Archaeological Significance are set out in the Local Plan Development Management Policies document. The NIMR site is not in such an Area. However it borders Area 16 and is close to Area 1b. The Northern area of the NIMR site does contain extensive undeveloped land with significant potential for new discoveries. The Greater London Archeological Service (GLAAS) therefore recommends that any major application is supported by an archaeological desk-based assessment and, if extensive earthmoving is proposed on previous undeveloped land, field evaluation. The Southern built-up area has historical interest related to its wartime and medical research uses. GLAAS recommends historic building assessment and recording of significant structures prior to conversion or demolition. Research should be supported by documentary and oral history which together could inform locally distinctive place-making for the new development.
- 3.30 Any future planning applications for the NIMR site will need to consider the impact on the setting of nearby listed buildings, as set out in the 1990 Planning (Listed Building and Conservation Areas). These include the Banqueting House in the grounds of St Vincent's Convent, St Vincent's Convent (part called 'Littleberries'), Chapel adjacent to St Vincent's Convent and Burtonhole Farmhouse (all Grade II listed).
- 3.31 The Ridgeway lies to the south west of the NIMR site and is characterised by many institutional buildings, including religious institutions and schools. The area has a semi-rural character and much of the surrounding land is agricultural.
- 3.32 The combination of a countryside setting and yet being within easy reach of central London from the nearby underground station at Mill Hill East, makes the area a highly desirable place to live.
- 3.33 Any development should preserve or enhance the character and appearance of the Mill Hill Conservation Area as a designated heritage asset. Although the Mill Hill Conservation Character Appraisal states that the Main Building '*due to its inappropriate height, scale and prominent siting fails to enhance the character of the area*', it is the Council's desire to retain or rebuild the Main Building in part or in whole. There are opportunities to enhance the appearance of the Main Building through the removal of unsympathetic extensions and additions including flues, pipes and cables, and through improvements, additions and alterations to all elements of the elevations. It is expected that major adaptation to the building would be required.
- 3.34 In the event of the removal of the Main Building, it is unlikely that a replacement building of the same scale would be considered acceptable. This area is not designated as a strategic location, and would not be suitable for the location of a tall (over 8 storey) building. The

preferred approach would be to rebuild the central part of the building as closely as possible to resemble the existing form. This would deliver a number of benefits including :

- The replacement building would be of better design quality, and could incorporate key elements of the design of the existing building including:
 - The profile and appearance of the roof;
 - The form of the building; and
 - Architectural detailing.
- It would have the capacity to gently address poor architectural detail and additions which have contributed to the negative effect of the building on the Conservation area, and replace with elements that will enhance the character of the area
- It would maintain its contribution towards the Conservation Area as a focal point and landmark building forming part of an important view across the valleys into the Conservation Area from Totteridge Common and Totteridge Lane;
- It would deliver better quality homes, meeting all space standards, and better quality employment space;
- It would deliver a more energy efficient building; and
- It would improve the viability of the scheme, which could enable wider benefits to be delivered.

3.35 It is also recognised that the majority of the other buildings on the site are of low architectural quality and do not make a positive contribution to the character or appearance of the Conservation Area. The exception is the Collaborative Centre occupied by the MRCT at 1-3 Burtonhole Lane which is a three storey, flat roofed building dating from the 1950s but in a 1930s style. The Centre is not without architectural merit. Therefore, consideration could be given to the conversion and re-use of this building.

Transport, Parking and Access

3.36 Any submission made for the site will need to include an appropriate transport assessment, so that the impact on the road network is properly considered. The precise content of this assessment should be discussed and agreed with the Council's Traffic and Development Team. Consultation with Transport for London will also be required. The transport assessment will need to ensure it takes appropriate account of existing and committed schemes in the area.

3.37 The requirements of Barnet Local Plan policies CS9 (Providing safe, effective and efficient travel) and DM17 (Travel impact and parking standards) will need to be taken into account.

3.38 Common matters for proposals to address include road user safety, the adequate provision of parking facilities, enhanced access to public transport as well as ensuring there is adequate capacity on the local highway network. The design of new parking and transport infrastructure will need to be considered carefully given the sites location within the Green Belt and Mill Hill Conservation Area.

3.39 The site has existing vehicular access points on both The Ridgeway and Burtonhole Lane. Burtonhole Lane has a distinctive semi-rural character which contributes towards the residential amenities enjoyed by local residents. The redevelopment of the Burtonhole Lane Cluster could give rise to additional traffic. Therefore the existing vehicular access points

should be utilised and the creation of new vehicular access points is unlikely to be supported. Careful consideration needs to be given to vehicular movements from Burtonhole Lane and in particular the noise and disturbance that may arise from such movements.

Biodiversity

- 3.40 Proposals are expected to make a positive contribution to the protection, enhancement, creation and management of biodiversity. Within the context biodiversity means the range and capacity of flora and fauna species that exist on the site, and the protection thereof. It also covers the range and capacity that will be encouraged to the site and maintained through enhanced landscaping, new landscaping features – such as water features – and biodiversity friendly site management.
- 3.41 The main policies on this matter in the Barnet Local Plan are DM16 (Biodiversity) and CS7 (Enhancing and protecting Barnet's open spaces). The development provides the opportunity to seek the retention and enhancement as well as the potential for creation of new biodiversity habitats. This can be achieved through working with our partners including the London Wildlife Trust.
- 3.42 Policy 7.19 (Biodiversity and access to nature) is the primary London Plan biodiversity policy. This sets out the strategic policies for biodiversity. Section C (a) of the policy states development proposals should '...make a positive contribution to the protection, enhancement, creation and management of biodiversity.' Section (b) of the same policy, prioritise targets in Biodiversity Action Plans (BAPs) which this site will be expected to contribute towards. The Council will favour the provision of habitat for species identified in the London BAP.

Trees

- 3.43 An Arboricultural Survey was undertaken in 2013. Development Plan policies seek broadly to protect trees and hedgerows and encourage suitable new planting.
- 3.44 Key policies on this matter include CS7 and DM01 of the Barnet Local Plan and 7.21 of the London Plan. Local Plan policies seek to create a greener Barnet. Through the protection of incidental greenspace, trees, hedgerows and watercourses the development can contribute to maintaining and improving the greening of the environment enabling a connection from the rural fringes of Barnet through to its urban green spaces.
- 3.45 London Plan Policy 7.21 (Trees and Woodlands) supports the retention of trees of value following the principle of 'right place, right tree' as set out in the London Tree and Woodland Framework, 2005. The planting of additional trees, particularly large canopied species is encouraged.

Sustainability

- 3.46 In terms of ensuring the efficient use of natural resources and taking account of environmental considerations specifically Barnet Local Plan policies CS13 and DM04 set out the Council's approach to minimising the Borough's contribution to climate change. It highlights SPDs on Sustainable Design and Construction and Green Infrastructure (draft to be published in 2016). Policy DM04 focuses on the Council's environmental considerations

of development setting out requirements on energy, contamination, flood risk, water quality and air and noise pollution.

A small part of the south of the site sits on Secondary A Aquifer and within Source Protection Zone II and we would therefore like to provide the following comments and recommendations.

- 3.47 Policy DM02 also identifies several standards that different types of scheme will be expected to meet in this respect (and others).
- 3.48 Chapter 5 of the London Plan contains a range of policies which set out London's approach to mitigating and adapting to climate change, waste and contaminated land. These policies are supported by a further layer of detail in local and Mayoral supplementary guidance documents on Sustainable Design and Construction.

4 Proposed Development Parameters

- 4.1 The Council will consider development of this site against the development parameters set out in this Section. These parameters take account of the site characteristics, within the context of the planning policy outlined above.

Topography

- 4.2 The topography of the site is a major feature which creates opportunities and challenges. There is a significant fall in height of the land from south to north, dropping from a high point of approximately 117m above ordinance datum (AOD) to its lowest point of approximately 90m AOD. This represents a drop of 27m. The steepest gradient on the existing access road is the area between The Ridgeway and Valley clusters which has a 1 in 7 incline. There is also a change in levels east to west across the site.
- 4.3 There is the opportunity to use level changes to hide car parking, preferably below ground. The landscaping can take account of the topography varying in its structure to help hide new buildings, whilst careful strategic planting can create views out from the new development. The level changes ensure that there are downflows for the introduction of a sustainable urban drainage system and discharge, if required, to Folly Brook to the north.
- 4.4 New development may require parts of the site to be relevelled. This should primarily be done by cutting into the slopes, not building up the lower parts of the slope. It must be borne in mind that in the 1970s the parts of the site were levelled to create a series of terraces. The terraces are used to provide car parking space for the existing staff and therefore do not have to support significant weight. In these areas, and possibly across the site, pile foundations will be required and adequate root protection areas are required to avoid damage to retained trees.
- 4.5 An existing underground structure is within the site, and further investigation will need to be carried out to establish whether the removal of this subterranean building would have a detrimental impact on ground stability.
- 4.6 The development on the escarpment does mean that buildings will be exposed to views from the north (and Totteridge Valley in particular). The existing tree cover is unlikely to be adequate to screen all the new buildings, particularly as some trees are likely to be removed and leaf fall, which exposes the development in the winter. Therefore, the maximum use must be made of the topography as part of the landscaping scheme. This will help to screen the new development. In addition, due to the exposure of the development on the slopes of the escarpment, the use of materials which blend into the escarpment will be an important design consideration.

Trees

- 4.7 A key feature of the NIMR site is that the existing trees provide an important screen for buildings when viewed from the playing fields and the wider Totteridge Valley. However, it should be acknowledged that in winter when the trees have lost their leaves, buildings become far more exposed in views, particularly from the north.
- 4.8 The existing landscaping on the site was purposefully laid out as part of the growth of the NIMR, to screen car parking when constructed in the 1970s. The resultant mix of trees and other vegetation make a significant contribution to the character of the site.

- 4.9 Consequently, trees of any category have an important role in providing a valuable level of cover and contribute to the sylvan character of the site. Any proposals for redevelopment of the site, including excavation works and construction of new buildings should ensure that every effort is made to retain trees that provide screening to the development, and include appropriate re-planting in accordance with a landscape masterplan.
- 4.10 The BSI 'Trees in Relation to Design, Demolition and Construction –Recommendations' state that Category A, B and C trees are a material consideration to development. However, given the importance of the trees in providing a screen to existing and new development, any redevelopment should seek to retain as many trees as possible and replace any lost trees as part of an overall landscaping and tree strategy. The strategy needs to take account of the types of trees throughout all four seasons.
- 4.11 The most recent survey of trees on the NIMR site was conducted in 2013. A new tree survey will need to be conducted and submitted as part of the planning application.

Edges of the NIMR site

- 4.12 The character of the site edges and their relationship with the surrounding area significantly impacts on the site's sense of openness and permeability. The treatment of the edges will be important in the consideration of any assessment of an application for redevelopment.
- 4.13 The southern site boundary fronts The Ridgeway and it is marked by original boundary posts with chain linkage. This boundary is also bordered by the security fencing as well as a line of trees along this frontage within a grassed strip which provides some softening to this edge. However, due to the width of the entrance and exit, this row of trees is marked by a number of gaps.
- 4.14 The possibility exists to open up this edge through removing the security fence and making soft landscaping improvements to the tree line and formal green space to the front of the Main Building. The original low boundary posts with chain-link are considered to have positive impact on the appearance of the front of the site and should be retained, to the front of the development.
- 4.15 There is also the opportunity to add visual interest to the front of the site through the addition of a public art to the grass area by the Main Building. This can form part of a wider public arts strategy which together with the landscaping strategy can reflect the history of the site.
- 4.16 The eastern boundary of the site is heavily planted and the current development is only partially visible from Burtonhole Lane. Burtonhole Lane has a semi-rural leafy character. Eleanor Crescent is characterised by two storey houses. The rear gardens of these properties back onto Burtonhole Lane.
- 4.17 The western boundary of the site adjoins Rhodes Farm, a residential clinic for children and young adults operated by Mental Health services. A group of mature trees are positioned close to this site boundary, and form a screen which obscures buildings on the NIMR site, when in leaf. The western site boundary runs northwards where it adjoins a public footpath accessed from St. Vincent's Lane. Redevelopment proposals should ensure the residential amenities of the neighbouring properties are protected. The visual impact of any new buildings in close proximity to the western site boundary should be carefully considered and ensure they are not overly prominent.

- 4.18 At present, the northern boundary of the main developed area which adjoins the playing fields is marked by high security fencing which is not considered a satisfactory treatment of this edge. The removal of the security fencing is considered to be a requirement and a major benefit. Any new boundary treatment measures will need to be carefully considered.
- 4.19 Instead of boundary fences or walls, the use of soft boundaries, including planting and hedgerows would be considered more appropriate.

Contamination

- 4.20 Due to the use of the site for medical research, there is believed to be a level of contamination across the site. The Council recognises that there is a development opportunity to remediate any damaged land. Decontamination studies will be vital to the progress of development on this site and detailed assessment of ground contamination and soil sampling should be agreed with the Council's Environmental Health Officers.
- 4.21 The MRC, as current landowners, has an obligation to remediate the site prior to the sale of the site. The Environment Agency have recommended:
- Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
 - Refer to the Environment Agency Guiding principles for land contamination for the type of information that is required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
 - Refer to the contaminated land pages on GOV.UK for more information.

Site Permeability and views

- 4.22 Although the site currently benefits from a large proportion of non-built areas, because of the nature of the existing use. A high security fence is positioned around the perimeter of the developed parts of the site. There is no public access to the operational part of the site.
- 4.23 There is a public right of way running from St Vincent's Lane, across the open land in the northern section of the site. This provides access to the NIMR playing fields, and the pavilion and sports fields at the Mill Hill Sports Club. However, as the location of this public right of way is at the bottom of St Vincent's Lane, it is not apparent to people walking along The Ridgeway.
- 4.24 The site offers good opportunities to increase public access into and through the site. At present a high secure fence surrounds the developed parts of the site. Public access within this area is therefore not possible. As the fence is a requirement of the NIMR, it will be removed as part of the site clearance and the new development will have greater public access.
- 4.25 However, a balance must be struck between public access and the protection of the amenity of new residents, who will regard the open areas around the residential blocks as their amenity space. Therefore a hierarchy of open space should be applied:
- Private amenity spaces – will immediately adjoin the new residential blocks, including gardens for houses, and is restricted for the use of residents. Avoidance of creating a gated community, however, should be a priority.

- Managed public open space – this could include more formal garden areas where the public have access at certain times, but also caters as amenity space for residents.
- Public open space – this will include the glades, meadow, pitches and woodlands.

- 4.26 Views into the site from St Vincent's Lane are in places restricted by existing trees and woodland copse. However, any new development beyond the existing development building lines will be greatly exposed from St Vincent's Lane which would urbanise the lane, given the already built up nature of the St Vincent's development to the west. Therefore, intensive planting will be expected in this area to minimise the impact.
- 4.27 Due to the substantially built up nature of the development in the Ridgeway cluster, there are very limited views through the site from The Ridgeway. Careful consideration of the future layout of buildings could increase views of the Green Belt from The Ridgeway. This can be achieved, for example, if the arms of the Main Building are re-provided as separate blocks.
- 4.28 Views into the site from Burtonhole Lane are obscured by the trees and hedgerows, which contribute to the character of the site and Burtonhole Lane. Therefore these trees and hedgerows should be retained.

Connectivity

- 4.29 The main access to the NIMR site is from The Ridgeway. This forms a one-way in entrance and one-way out exit. The Collaborative Centre at 1-3 Burtonhole Lane has a separate one-way in, one-way out entrance on Burtonhole Lane. This is not accessible by vehicles through the main site.
- 4.30 The PTAL rating for the NIMR site is 1a/1b. The nearest underground station is the Northern line station at Mill Hill East which is a 19 minute walk from the site. The nearest over ground station is Mill Hill Broadway which is a 37 minute walk from the site. There is a bus stop directly outside the main entrance on The Ridgeway which is served by the 240 bus route which runs to Edgware Station, Mill Hill Broadway and Golders Green Station every 11-13 minutes.
- 4.31 Due to the low PTAL rating, future development will need to provide car parking to comply with the Council's parking standards as outlined in Policy DM17 *Travel Impact and Parking Standards* which requires:
- 2 to 1.5 spaces per unit for detached and semi detached houses and flats (4 or more bedrooms);*
 - 1.5 to 1 spaces per unit for terraced houses and flats (2 to 3 bedrooms); and*
 - 1 to less than 1 space per unit for development consisting mainly of flats (1 bedroom).*
- 4.32 Advantage should be taken of the level changes to provide underground parking so as to minimise surface level parking.

5. Approach to Development

Urban Form

- 5.1 The higher density area of development should be located on the southern part of the site. The development should become progressively less dense and lower in height further north into the site. The transition from north to south should be carefully considered, making use where possible of the different levels across the site to minimise the visual impact of any new buildings. Underground parking may also make use of the level changes. Lower down the slope to the north there should be a transition from flats to houses. Detached houses are considered a more appropriate form of development in the northern part of the site on the edge of the countryside.
- 5.2 The grain of any proposed development will need to respect both the Green Belt and the character and appearance of the Mill Hill Conservation Area. The pattern of development and road layout should not undermine permeability and should positively contribute to the legibility of the site. The grain of development of the site should provide good separation distances between the blocks and improve views of the Totteridge Valley as well as increase permeability through the site.
- 5.3 Provision should be made for a range of different types of amenity spaces including courtyard gardens serving blocks of flats, balconies and roof gardens. Varying levels of privacy and access will need to be provided so that some amenity spaces are publicly accessible while others can only be used by residents.



Figure 7 : indicative developable area and front building line

Zoning of Development

- 5.4 New built development will be restricted to the Ridgeway Cluster, including the associated car parks, and the Burtonhole Lane Cluster only as indicatively shown on Figure 7. No development, save for ancillary facilities for the playing pitches and a possible visitors

centre for the Totteridge Valley (as part of a new regional park, as promoted in the London Plan) will be acceptable outside of these two areas.

- 5.5 It is accepted that new development will not be built over the precise footprint of existing buildings. However, the indicative building line fronting The Ridgeway needs to take account of the impact of increased massing of buildings and the retention of the open area to the front of the Main Building. The indicative building line is shown on Figure 7.

Approach to Landscaping

- 5.6 The provision of high quality soft landscaping will be important in any redevelopment of this site. This will include the retention of trees that provide screening to buildings and the provision of avenues of trees along new routes through the site.
- 5.7 Soft landscaping will be particularly important in providing privacy screening for any residential properties near the northern boundary. As the northern boundary adjoins open countryside and is highly visible, fencing and walls will generally be resisted. Natural boundaries should be created wherever possible using hedging and trees as well as the possibility of a ha-ha.
- 5.8 The dense tree planting close to Burtonhole Lane makes an important contribution to the leafy character of the site and should be respected.
- 5.9 The proposed species of plants and trees will need to be carefully considered, particularly considering their proximity to buildings and the roles these species would have in providing screening. Planting of native species will be encouraged for the beneficial effect they will have in improving biodiversity on-site. The applicant will need to submit a landscaping management plan with the application outlining the maintenance and management strategy for green amenity spaces.

Energy and Carbon Reduction

- 5.10 The London Plan Policy 5.2 Minimising Carbon Dioxide Emissions emphasises that development proposals should make a contribution to minimising carbon dioxide emissions in conjunction with the energy hierarchy. Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- Be lean: use less energy
- Be clean: supply energy efficiently
- Be green: use renewable energy

Development should demonstrate how it is Lean, Clean and Green through an Energy Statement.

- 5.11 The London Plan emphasises that major developments meet the following targets for carbon dioxide emissions reduction in buildings:

Year	Improvement on 2010 Building Regulations
2013 – 2016	40 per cent

The Policy also highlights the fact that Major Developments should provide an energy assessment to demonstrate how the development will seek to reduce carbon emissions.

Flood Risk and Surface Water Management

- 5.12 The development should not have a harmful impact on the water environment, water quality and drainage systems. There are no significant water features, except for Folly Brook, a small stream, to the north of the site with a branch cutting from north to south along part of the north western boundary. The site is not within a flood zone.
- 5.13 It is unknown whether these bodies of water perform a flood attenuation function. Further surface water assessment will be necessary to determine this and whether alternative drainage solutions may be required. A site wide Surface Water Drainage Strategy is required and this would need approval from the Council in its capacity as Lead Local Flood Authority. New water features should be natural to improve biodiversity. Dependent on the findings of the Surface Water Management Report, the uses of Sustainable Urban Drainage Systems (SUDS) may be appropriate.

6. Skills, employment, enterprise and training

- 6.1 The NIMR is a major employer in the Borough and the Council seeks to mitigate its loss when it relocates to St Pancras.
- 6.2 Much of the site is currently used for B1 employment purposes and the Council supports the re-provision of space on site. Redevelopment provides opportunities for employment creation, ensuring the continued contribution to innovation through provision of workspace for small to medium enterprises. The opportunities for new commercial development should complement the Council's *Entrepreneurial Barnet* strategy. This supports the provision of the creation of new high quality commercial space with lease arrangements that are viable for SMEs.
- 6.3 The Council considers that there is an opportunity to utilise part of the Main Building and retain the Collaborative Centre at No. 1-3 Burtonhole Lane for such purposes. The benefit will be a range of new spaces that are both flexible and affordable, providing the conditions for start-ups to grow and to enable existing small to medium enterprises to prosper. This would create modern business space that through sensitive design may provide opportunities for public access to support facilities which could include a café or a small gymnasium / fitness centre.
- 6.4 Development involving loss of employment space will be expected to mitigate the loss and make contributions to employment training. Calculations of such contributions will be made on a site by site basis in line with the Skills, Employment, Enterprise and Training SPD 2014. Contributions will be retained for specific employment, skills, training and enterprise support and initiatives highlighted in the Economic Strategy (Entrepreneurial Barnet).
- 6.5 The scale of development also triggers a requirement to manage development related job opportunities the Council will use a Local Employment Agreement (LEA). A LEA sets out the skills, employment and training opportunities to be delivered from development and must include all employment opportunities generated by construction as well as the end use where the development creates more than 20 FTE (full time employee) jobs.
- 6.6 On all schemes where affordable homes are being built, the developer will be encouraged to employ trainees through the Notting Hill Housing Trust Construction Training Initiative, or a similar scheme. Further details are available at <http://www.nottinghillhousing.org.uk/about-us/work-for-us/construction-training>

7 Planning Application Requirements

- 7.1 Due to the Green Belt location and siting within a Conservation Area the Council will expect a full planning application to be submitted for the site. This will enable the Council to consider the detailed design issues alongside the general principles of redevelopment of the site, as the two are inter-related.
- 7.2 The Council has a Validation Checklist, which sets out the national and local requirements for planning applications. The developer, through the pre-application process should engage with the Council's planning officers to agree the range of documents to be submitted and the scope and standard expected. This will help to ensure that there are no delays in the validation process, and that requests for additional information are minimised once the application has been received.
- 7.3 Furthermore, early discussions should be held with Council officers on the likely conditions should any application be approved. Where conditions require the submission and discharge of further documents, the scope of those documents should be agreed before they are submitted. This will help with the discharge of conditions.
- 7.4 The Council's requirements for consultation on planning applications are set out in the Statement of Community Involvement as adopted in June 2015. The applicant will need to demonstrate that the proposal has undergone significant community engagement in order to consult with different groups within the local community. This will be detailed within the Statement of Community Involvement as submitted with the application.

8 Development Contributions

Community Infrastructure Levy

- 8.1 The purpose of CIL is to pay for infrastructure required to mitigate the impact of development across the Borough. Barnet's CIL charging rate has been set at: £135 per m². It applies to the 'net additional floorspace' of new development which is delivering 100 m² or more of gross internal floorspace or the creation of one additional dwelling. Net additional chargeable floorspace in the NIMR will consist of the additional floorspace over and above the total existing office floorspace.
- 8.2 In addition to Barnet's CIL the Mayoral CIL applies to all chargeable development in the borough. A flat rate of £35 per m² applies.

S106 Requirements

- 8.3 The items sought through a planning obligation will vary depending on the development scheme and its location. Considerations that may be included in a Section 106 agreement include:
- improvements to public transport infrastructure, systems and services
 - education provision
 - affordable or special needs housing
 - health facilities
 - small business accommodation and training programmes to promote local employment and economic prosperity
 - town centre regeneration and promotion
 - management and physical environmental improvements including heritage and conservation
 - improvements to highways and sustainable forms of transport
 - environmental improvements
 - provision of public open space and improving access to public open space including sport pitches
 - other community facilities including policing
 - other benefits sought as appropriate.
- 8.4 In accordance with Paragraph 204 of the NPPF, planning obligations should only be sought where they meet all of the following tests:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.
- 8.4 In considering planning obligations, we will take into account the range of benefits a development provides. It will also be important to ensure that the scale of obligations are carefully considered so they do not threaten the viability of development, in accordance with paragraph 173 of the NPPF.
- 8.5 The extent to which a development is publicly funded will also be taken into account and policy applied flexibly in such cases. Pooled contributions will be used when the combined impact of a number of schemes creates the need for infrastructure or works, although such pooling will only take place within the restrictions of the Community Infrastructure Levy Regulations 2010.

Appendix 1 – Planning Policy Matrix

Planning Issue	National Planning Policy Framework (NPPF)	London Plan Policy	Local Plan Policy
Green Belt	Protecting Green Belt Land – paragraph 79	Policy 7.16: Green Belt	Policy CS7: Enhancing and protecting Barnet's open spaces Policy DM 15: Green Belt and open spaces
Employment	Delivering sustainable development - paragraph 22	Policy 4.1: Developing London's Economy Policy 4.2: Offices Policy 4.10: New and emerging economic sectors Policy 4.11: Encouraging a connected economy Policy 4.12: Improving opportunities for all	Policy DM14: New and existing employment space Policy CS 8: Promoting a strong and prosperous Barnet
Housing Delivery	Delivering a wide choice of high quality homes – paragraph 50	Policy 2.6: Outer London - Vision and strategy Policy 2.7: Outer London - economy Policy 2.8: Outer London - transport Policy 3.8: Housing Choice Policy 3.4: Optimising housing potential Policy 3.5: Quality and design of housing developments Policy 3.12: Negotiating affordable housing on individual private residential and mixed use schemes	Policy CS4: Providing quality homes and housing choice in Barnet. Policy DM08: Ensuring a variety of sizes of new homes to meet housing need.
Heritage and Landscape character	Conserving and enhancing the historic environment – paragraph 126	Policy 7.4: Local character Policy 7.8: Heritage assets and archaeology.	Policy CS5: Protecting and enhancing Barnet's character to create high quality places Policy DM06: Barnet's heritage and conservation
Biodiversity and open spaces	Conserving and enhancing the natural environment – paragraph 109	Policy 2.18: Green Infrastructure – The multi – functional network of green and open spaces Policy 7.19: Biodiversity and access to nature Policy 7.21: Trees and woodlands	Policy CS7: Enhancing and protecting Barnet's open spaces Policy DM 15: Green Belt and open Spaces Policy DM 16: Biodiversity
Sports and recreation	Promoting healthy Communities - paragraph 73	Policy 3.6: Children and young people's play and infant recreation facilities Policy 3.19: Sports facilities	Policy CS7: Enhancing and protecting Barnet's open spaces Policy CS11: Improving health and well being in Barnet
Tall Buildings	Requiring good design – paragraph 56	Policy 7.7 Location and Design of tall buildings	Policy DM05: Tall Buildings