

APPENDIX B – Schedule of Consultation Responses

Ref. No.	Name / Organisation	Section / Page / Para	Comments or Changes Proposed	Council's Response
1	Crime Prevention Design Advisor, Barnet Borough Police,	7.9 – 7.11	<p>“Safety & Security” section give reference to the importance Crime Prevention Through Environmental Design (CPTED), indeed Para 7.11 states “The Police initiative ‘Secured By Design’ focuses on crime prevention at the design, layout and construction stages of development by seeking to design out crime. It is important to also account for local conditions regarding safety and security during the building design stage”.</p> <p>In support of Para 7.11 Barnet Borough Police would wish to add “ACPO Secured By Design (SBD) Pre-Planning advice is available via the local Police Crime Prevention Design Advisor (CPDA). Information and advice on crime risk and site specific crime prevention design criteria are available free of charge to planning applicants compiling a Design & Access Statement. The Code for Sustainable Homes (DCLG 2007) also awards points to developments that have met the requirements of SBD Design Guide - New Homes Section 2. Further information on SBD can be found via www.securedbydesign.com</p> <p>Incorporating the principles of SBD should improve community safety and security within the built environment. Once a development has been completed, the main opportunity to incorporate crime prevention measures has gone. Careful design needn't cost more if considered from the outset.</p>	Reference to Secured By Design (SBD) details and website is provided at Table 3 / number 6 of the SPD. Para 7.11 makes cross reference to Table 3.
2	Bestsafe Ltd	General Comment	Barnet Planning Policies should be more relaxed, less draconian and aimed at accommodating the needs of growing population who require smaller / flexible dwellings than in the past. The sizes / dimensions should be much more flexible and smaller size rooms should be allowed. In Japan, people are sleeping effectively in “sliding horizontal draws”, planning must be much less restrictive and more freedom should be given to homeowners.	Barnet has one of the most up to date Local Plans in the country. In June 2012 our Core Strategy and Development Management Policies documents were found sound and consistent with the National Planning Policy Framework by an Inspector appointed by the Secretary

				of State. The Mayor of London regards the size of all new homes to be a key strategic issue and the London Plan sets out minimum space standards for dwellings of different types. The space standards are intended to ensure that all new homes are fit for purpose and offer the potential to be occupied over time by households of all tenures.
3	Finchley Society and the Hendon and District Archaeological Society (HADAS) N12.	General Comment	The Societies are in general supportive of this draft.	This support is welcomed.
4	-	1.3 and 1.5	These paras are strongly supported	This support is welcomed.
6	-	1.6	The fourth and fifth sentences are weasel words, and should be redrafted for clarity and honesty. If they mean that core strategy objectives, viability and the need for housing may override the provisions of the SPD, this should be admitted, and an indication given of the circumstances in which and reasons for which this might happen.	Planning needs to demonstrate flexibility and be able to respond to change. The focus of this SPD as set out in para 3.2 is on the residential suburb. We cannot afford to not consider viability but the overriding objective of this SPD in terms of delivering high quality design that responds to Barnet's suburban character is clear.
7	-	1.9	This para should signpost the sections on conservation areas and listed buildings found at 17.13 and following. Otherwise a user may not realise there are special rules governing these, which are not mentioned elsewhere except in 14.51 on porches	Agreed. Para 1.8 has been amended to signpost reflect sections on conservation areas and listed buildings.
8	-	1.13	Add "Any changes will be subject to consultation."	Agreed. Any future revisions to the design categories will be subject to

				consultation.
9	-	3.3	When will the town centre strategies appear?	Progress is being made with the first round of town centre strategies. New Barnet and Finchley Church End have been adopted. Strategies for Edgware and Chipping Barnet should be adopted in Summer 2013. Progress with North Finchley should become clearer in 2013. The next round of town centre strategies should include Golders Green and Whetstone.
10	-	3.4	Should there be an expressed determination to keep these CACAs up-to-date?	As highlighted at para 7.2.3 of the Development Management Policies document there is a rolling programme of CACA renewal. Appendix 2 of the Development Management Policies document highlights as a monitoring indicator for DM06 that no CACA is more than 5 years old.
11	-	4.1	Admirable, provided the Council are determined to hold to it, and to defend decisions on appeal.	This support is welcomed.
12	-	Table 3. 8	Why 'normally' in the penultimate sentence? When need they not comply?	Reference to 'normally' has been removed and this section has been updated to reflect new TfL guidance on travel planning for new development.
13	-	5.1	In too many decisions the principles here seem to be ignored (and by the GLA in their decisions). The word 'drive' in the first sentence of 5.1 is an obfuscation; it seems to mean that one should not build just in order to achieve a density target, but it probably really means that applications will not be refused solely because they exceed the maximum densities in the Matrix. The Section should indicate the circumstances where the other factors listed in 5.1 outweigh the parameters of the Matrix. It is good, however, to see 'within' in the second sentence of 5.4. 5.5 is also good.	There was a detailed discussion about housing densities and the application of the Matrix at the Core Strategy Examination in Public in December 2011. The Inspector's Report of June 2012 supported Barnet's approach of optimising densities rather than maximising them. Para 5.4 makes cross reference to the

				<p>Mayor's Housing SPG on sites outside the density ranges of the Matrix.</p> <p>The support on paras 5.4 and 5.5 is welcomed.</p>
14	-	6.18	<p>Section 6 is generally supported. A para should be added, or 6.18 should be expanded, to deal with gated developments (as distinct from single houses enclosed by high barriers), which are undesirable in that they detach whole groups of dwellings from the community, and give the impression that there is some sort of a jungle outside the protected area.</p>	<p>In para 6.18 it is already made clear that the fronts of the houses should generally remain open to view. High railings and gates are not encouraged as they can have a negative impact on the streetscene. Therefore we do not consider that para 6.18 requires any further amendment.</p>
15	-	6.18	<p>'is not encouraged' in the second sentence, and 'is encouraged' in 6.17, are odd words. If Barnet has powers to require something to be (or not be) done, it should be expressed here (as in the first sentence of 6.20); if not the sentences should be redrafted to use a word like 'should'.</p>	<p>Agreed. Paras 6.17 and 6.18 have been amended to remove 'is not encouraged' and 'is encouraged'</p>
16	-	7.4	<p>Give some guidance on how to achieve the balance between privacy and security.</p>	<p>Table 3 number 5 on Safer Places as well as number 8 on Secured by Design provides guidance on this balance. SPD provides a number of signposts on this.</p>
17	--	7.10	<p>'overlooking areas for car-parks' is an obscure phrase. What does it mean; why are car-parks different, and what is an overlooking area like?</p>	<p>A critical element in designing out crime is providing for adequate natural surveillance, via easy overlooking. For example, schemes should provide for overlooking onto and from front gardens, commercial frontages, pathways, streets, communal amenity areas and car parking spaces; especially from windows in front elevations. Such overlooking enables surveillance which discourages the types of crime which rely on secluded</p>

				areas.
18	-	7.14	What power does the Council have to restrict permitted development?	<p>The council restricts permitted development rights by the following two methods.</p> <p>1. Whenever we grant planning permission for new development we can restrict permitted development rights through the imposition of a planning condition. EG. When we grant planning permission for new houses it is standard practice to restrict permitted development rights.</p> <p>2. Imposing Article 4 Directions.</p>
19	-	8.2	This is strongly supported, but the Council must enforce it by refusing permission for developments without proper amenity space, and defending the refusal on appeal. The retreat in 8.6 is a disappointment, unless it is made clear that the Council decides what is 'imaginative and innovative' and this is not a let out for over-development.	<p>This support is welcomed.</p> <p>Para 8.6 clearly states that creative, innovative and imaginative designs are only encouraged where layout of residential development on very small site is restrictive; whereas all other sites are expected to comply with council's minimum outdoor space standards.</p>
20	-	8.5	second bullet point. There must be a balance here; blocking out views can be a detriment to public amenity space.	<p>This bullet point has been amended to ensure that reasonable views are still provided.</p>
21	-	8.10 and 11	should be complemented by a para about the loss of real front gardens, and what the Council can do about it.	<p>A cross reference to para 2.10.7 of the Development Management Policies document which considers the cumulative impact of loss of front garden's on local character and explains where planning permission is required.</p>
22	-	9.1 and 9.3	These paras are strongly supported.	<p>This support is welcomed.</p>
2/22	-	9.4	'normally' is a let-out; explain what exceptions there might be and	<p>Exceptions are widely noted in the</p>

			why.	London Plan and the Mayor's SPG on Housing (section 2.3.15) therefore we do not consider that we need to reiterate them in para 9.4.
23	-	9.7 and 9.8	These paras are strongly supported.	This support is welcomed.
24	-	10.4	It would be useful to have in the last sentence some examples.	A cross-reference to Department for Transport's Local Transport Note 1/12 - Shared Use Routes for Pedestrians and Cyclists (September 2012) has been added to para 10.4 providing advice on detailed design for shared uses.
25	-	10.7	It would be useful to have in the last sentence some examples.	Cross reference is made to "Safer Places: the planning system and crime prevention" which provides examples.
26	-	11.2	This encouragement of outdoor lighting should include a discussion of the ways in which light pollution can be mitigated.	This para has been updated with the cross reference to para 7.12 on lighting schemes.
27	-	11.10 and 11.11	These paras are strongly supported.	This support is welcomed.
28	-	13.2	There is a conflict between let-outs in the last sentence and the firm 13.6 (which is preferable)	This is not a let out. All town centre residential developments are considered on a case by case basis and are expected to comply with the requirements of Barnet's Local Plan
29	-	14	Some of this may have, regrettably, to be toned down in view of the government's planning relaxations	We await the government's publication of these changes to permitted development rights for extensions following consultation late last year. We consider that this SPD guidance will help homeowners who decide to take advantage of the relaxation of permitted development rights to build extensions that are appropriate to local context.
30	-	14.6	Admirable though this is, it is subverted by the Government's	This support is welcomed. As stated

			proposals on permitted development	above we await the government's publication of these changes to permitted development rights for extensions
31	--	14.20	Admirable though this is, it is subverted by the Government's proposals on permitted development.	This support is welcomed. See response above.
32	-	14.22	'deeper' than what?	Text has been amended to clarify that extensions that are deeper than the neighbours are inappropriate.
33	-	14.29	There are so many dormer extensions in Barnet now that it may be difficult to defend a refusal on appeal unless in a special streetscape.	Our approach to dormers is clearly stated in this SPD.
34	-	15.5	The last sentence should be clarified - are the conditions alternative or cumulative?	It is unclear what this representation relates to. The first sentence of para 15.4 highlights that conversions can have a cumulative impact on environmental quality and character.
35	-	15.7	The first sentence seems to be a statement of fact, and it would clarify to put 'converted' before 'dwellings'. Or is it a policy, and should read 'If a house to be converted has a garden, then on conversion that garden should be split into private garden areas.'?	Agreed. This is a statement and para 15.7 has been amended accordingly.
36	-	15.10	This para appears suddenly in the middle of paras about conversions; it should be somewhere else or in another document, and should add as necessary to DM09 to explain Barnet's policy towards HMOs.	Many residents get confused between conversions and HMOs when contacting the council or applying for planning permission, so this is for their benefit as well as to signpost any queries related to HMOs to Barnet's Environment and Licensing Services.
37	-	15.12	Extensions and roof alterations' should refer back to 14.29 and following.	Agreed. Para 15.12 has been amended accordingly.
38	-	15.14	But these are conversions, not purpose-built, and the para should relate to them.	Agreed. Para 15.14 has been amended accordingly.
39	-	15.15	Would refusal of permission to an external staircase at the rear stand up on appeal?	Any proposal for an external staircase would be considered on its own

				particular merits. The refusal of permission could "stand up" at appeal if the reason(s) for refusal related to harm to the appearance of the property and / or harm to neighbouring residents amenity and the reason(s) can be substantiated.
40	-	15.17	But, regrettably, many front gardens have gone anyway.	We are working to mitigate the loss of front gardens and its impact on local character.
41	-	16.6	These are admirable sentiments, but how can the Council enforce them?	As mentioned above, the council will continue to preserve Barnet's local character.
42	-	16.9	The SPD should assist its users by describing, briefly, the circumstances in which planning permission for a hardstanding is not required. In what circumstances other than level changes is it required? Principles. The third is a bit problematic. If most hardstandings do not require planning permission, whether or not they are harmful to local character, how can one justify refusal in cases where they do? and surely it is the crossing, not the hardstanding, that may be unsafe for pedestrians. Remove the apostrophe from "pedestrian's"	In most circumstances you will not need to apply for planning permission, but if you intend to create any type of new hard standing (e.g. patios, driveways, decking, etc.) which is 5m ² or larger; or repair an area of 5m ² or more of existing hard standing and if the area is between the principle elevation and the highway; and any rainwater runoff would end up going down the drains; then you need to apply for planning permission. For clarification para 16.9 has been amended.
43	-	17.14	This needs rewriting. Locally listed buildings should not be lumped together with those on the statutory list, since they have no special <u>legal</u> protection, but only that which is secured by the NPPF and the Local Plan. A listed building does not have to be historic in the usual sense of that word, though the great majority are; delete therefore 'historic' at the beginning.	Agreed. Para 17.4 has been amended accordingly
44	-	17.22	This para needs rewriting for sense and literacy. "Most planning applications are approved or refused by officers acting on authority	We consider that this section will help people who do not understand the

			delegated to them by the Council. But where several objections are received approval is not given without full consideration by a committee of councillors." It is unnecessary to bring in the technical subject of 'validation', which would require definition. Reference to the eight-week period is out of place here, and would anyway require something about appeals for non-determination.	planning process. Para 17.24 has been amended to cover non determination.
45	-	17.24	This para is badly drafted. 'it' in the i.e. parenthesis is totally unclear; read 'the development as built'. Delete the otiose 'being taken'. For the last sentence "Enforcement may compel a building to be returned to its original form or rebuilt in accordance with the planning permission."	Agreed. Para 17.25 has been amended accordingly.
46	Herts and Middlesex Wildlife Trusts, Herts. AL3.	General comment	HMWT is pleased that the council has addressed biodiversity in the draft document. The layout, design and landscaping of new development determines the impact that development will have on local ecology, both negative and positive. It is important to have in place a clear policy framework to ensure that development makes a positive contribution to biodiversity, reflecting goals set out by government in the NPPF.	We welcome this support
47	-	6.21	It is positive that the council has set out that ecological surveys and mitigation will normally be required for development in gardens, and for major schemes where buildings are to be demolished. However, we would welcome a slight amendment to the text to reflect the fact that any scheme within a site that may contain wildlife habitat should be subject to ecological survey. This includes but is not limited to 'green field' sites, gardens, previously developed land/'waste land' etc. Furthermore, the council should consider whether a trigger list should be produced (possibly as part of a separate SPD) indicating when applicants should be required to submit ecological survey information. Although the opportunities to improve ecological network are greater in major and large-scale development schemes, all development should seek to protect and, where possible, enhance biodiversity, including householder and minor development. Developers should seek to achieve biodiversity enhancement	Para 6.21 highlights that in relation to all developments. where protected species are encountered mitigation measures and ecological surveys will normally be required. However we consider that the scale of the requirement should be commensurate with the scale of the development. Cross reference has also been made to section 2.16 of the SD&C SPD which sets out that an Ecological Statement is required for all major and large scale schemes. Reference has been added to ensure that where the established ecology justifies it a survey/mitigation

			alongside other goals, such as through provision of multi-functional green infrastructure, as well as responding to particular ecological restoration opportunities within the site.	measure may also be necessary Further details on improving ecological networks will be set out in the Green Infrastructure SPD.
48	-	6.23	<p>Developers should consider and respond in their design to the habitat types and habitat features within and around the site; the existing ecological network; and opportunities to strengthen the ecological network through habitat management, enhancement, restoration and creation. Applicants should give consideration to how landscape management can contribute to improving site biodiversity</p> <p><i>The council should encourage adoption where possible of landscape maintenance regimes that do not reduce or restrict the biodiversity potential of a site (eg. over-frequent mowing).</i></p> <p>Soft landscaping should aim to protect existing trees and other features of wildlife value (eg. hedgerows), integrate them into new layouts and landscaping, and enhancement through positive management.</p> <p>Locally native species of local provenance and suited to the site's environment should be used where possible in planting schemes.</p>	Further details on improving ecological networks will be set out in the Green Infrastructure SPD.
49	-	8.4/8.5	Consideration should be given to the multiple roles played by amenity space and green space, and its importance in providing ecosystem services. Landscape and habitat management regimes should look where possible to overlap and combine functions and deliver as many benefits to communities as possible.	Para 8.1 highlights the contribution of outdoor amenity space to overall quality of life. Further consideration of its contribution to ecology will be highlighted in the Green Infrastructure SPD.
50	Pete Crockford (Barnet Resident) N2	16.2	There is another aspect and down-side to hardstandings and vehicular crossovers that ought to be reflected and suggest adding "But it is important to recognise the loss of on-street parking caused by the provision of a cross-over and allied safe visibility strips either side. This can mean that there is often a net overall	Para 16.2 has been revised to highlight that increased car ownership and demand for parking spaces has put pressure on the use of off-street car parking, leading to loss of on-street

			loss in real terms, and always in practical terms, since there will not be "general use" of the new "private space (s)".	parking provision as there will not be general use of the new private spaces (Para 16.7 makes reference to visibility splays.
52	London Wildlife Trust – Barnet Group, N12	6.21	<p>Para States the following: <i>"In relation to all developments ... , the implications of the presence or proximity of protected species <u>and animals should be considered.</u></i></p> <p>To be lawfully correct, the underlined words <u>above</u> should be deleted</p> <p>The underlined words <u>below</u> should be inserted: <i>"In relation to all developments ... the implications of or the presence or proximity of Protected species <u>must be taken into account to comply with the requirements of The Wildlife and Countryside (as amended) Act 1981.</u></i></p>	Reference to the Wildlife and Countryside Act(as amended) Act 1981 has been added to para 6.21.
53	-	6.21	<p><i>"In relation to all developments ..., the implications of the presence or proximity of protected species ...<u>Ecological surveys and suitable mitigation measures will normally be necessary, e.g. the use of bat boxes in the (re) builds of extensions and auxiliary buildings in back gardens.</u></i></p> <p>All <u>underlined words in the above</u> are to be deleted</p> <p>All <u>underlined words in the sentences below</u> are to be added This should state: <i>"In relation to all developments ..., the implications of the presence or proximity of protected species ...<u>Ecological surveys as well as mitigation measures are essential and will be required. This information must be presented to the Council's Planning Committee prior to the determination of the application.</u></i></p>	<p>Reference to bat boxes has been deleted from para 6.21.</p> <p>Para 6.21 has been revised to state that requirements for surveys and mitigation measures should be commensurate with the scale of development</p>

54	-	6.21	<p>Para 6.21 also then continues: <i>"... Major residential development should normally utilise opportunities for ecological preservation and / or restoration as part of scheme design and layout, informed by surveys where existing buildings are to be demolished. Refer to Section 2.16 of the SD&C SPD"</i></p> <p>the underlined words <u>above</u> should be deleted</p> <p>The underlined words <u>below</u> should be inserted This should state (in order to accord with Section 2.16 of the SD&C SPD): <u>All sizes of any development must protect and enhance the natural ecological environment, maintain and improve biodiversity and harness the benefits of healthy local habitats.</u></p>	<p>As stated above para 6.21 has been revised to state that requirements for surveys and mitigation measures should be commensurate with the scale of development</p>
55	SPACES Organisation, Barnet, Herts, EN5	16.10	<p>We are unhappy with the wording of both the present and the proposed guidance concerning crossovers because they are too vague and open to abuse. In particular, we would like to see a change to section 16.10 which states:</p> <p><i>"The area needed to park a car should be a minimum of 2.4m in width to allow parking at right angles to the footway. It is advised to leave a clear space of approximately 500mm between any vehicle and the public highway and at least 1m between the hardstanding and the front of the property."</i></p> <p>We would like to see a return to the situation of some years ago when a minimum depth was specified as well as a minimum width. The current situation, and also the one that would continue with the proposed guidance, is that the Council makes a judgment as to whether a crossover is to be granted on the basis of the applicant declaring what car they have. The Council then decides whether</p>	<p>Para 16.10 highlights minimum standards for a crossover application as required by Highways.</p> <p>A new para (16.11) has been added to this section highlighting that for an amendment to an existing access the area needed to park should be sufficient to ensure that the vehicle can be parked at right angles to the footway and does not overhang the public highway. It would be preferable to leave a clear space between any vehicle and the public highway, and a gap between the hardstanding and the front of the property".</p>

			<p>or not their car can be parked at right angles to the footway. There have been at least three cases in our roads where the owner of a property has bought a SMART car (or similar), applied for a crossover, and subsequently sold it. Their new larger car is then parked in front of the crossover (technically an offence, but never enforced in areas outside controlled parking zones). They have achieved their own place for road parking while losing a front garden resulting in the various detrimental effects outlined in the guidance document. During the period that the three crossovers referred were granted, I can only think of one in our area that has been granted and will probably be used for its intended purpose (ie parking on it).</p> <p>I believe that one of the reasons that the minimum depth requirement was removed was because of the advent of electric cars and the need to charge them. So far, very few have been sold and there is zero ownership in our area. The most common make in London (G-Wiz) is very small car and would meet crossover requirements, whatever wording were to be adopted. On the whole electric cars are likely to be for use in and around cities and will tend to be quite small.</p>	
56	SPACES Organisation, Barnet, Herts, EN5		<p>Our group would also like to propose that some acknowledgement is made of the increasing use of live/work arrangements. We are not suggesting that an extra section be added, but we believe that it would be appropriate that, where a property is used for live/work occupation, similar guidance should apply as to sole residential occupation. Arguably the guidance is even more important than for pure residential use because the implication of live/work is that the occupants will be present in the property for longer periods. At the moment, live/work usage seems to be covered by few if any guidelines, thus creating a loophole.</p>	We refer to the Mayor's Housing SPG November 2012 (paras 1.2.36 and 4.4.8) for guidance on Live Work
57	Robert Newton (Barnet Resident) N12	Introduction	<p>After the first para that reads "Housing developments....." add a new para to read:</p>	The principles of good design at Section 4 make clear that design that is inappropriate to context is not

			“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”. (National Planning Policy Framework (March 2012) Para 64).	acceptable. Para 4.1 incorporates the wording from the NPPF.
58	-	3.5	In the second sentence on the second line of para 3.5 insert the words “single family” between the words “by” and “houses”.	The Local Plan Core Strategy sets out the approach to housing in policy CS4: Providing quality homes and housing choice in Barnet. The policy sets out that a range of dwellings sizes and types of housing including family and lifetime homes will be sought that meet our identified housing priorities and does not undermine suburban character or local distinctiveness. The need for conversions to consider the dwelling size priorities is referenced in paragraph 2.8.2 in the Local Plan Development Management Policies.
59	-	6.1	In the first line of the first sentence of para 6.1 insert the words “characterisation by the type of housing (e.g. single family houses),” between the words “including” and “built form”.	See response at 58 with regard to single family homes
60	-	6.15	In the third sentence of para 6.15 delete the words “where possible” between the words “used” and “for”.	Agreed. Text has been amended accordingly.
61	-	6.22	In the second line of the second sentence of para 6.22 insert the words “, absorbing rainfall” between the words “overheating” and “and”. At the end of para 6.22, insert an additional bullet point that reads: make provision for Sustainable Urban Drainage Systems (SUDs) whenever appropriate.	Agreed. Text has been amended accordingly.
62	-	8.7	At the end of para 8.7 insert a new sentence to read: “These contributions are separate from and in addition to any contribution that is required where a development is located in an area of open space deficiency”.	Agreed. Text has been amended accordingly.

63	-	Section 6 – Principles – First bullet point	Insert within the first sentence in the first bullet point the words “such as by providing single family houses in an area characterised by single family houses, and” between the words “area” and “through”.	See response at 58 with regard to single family homes
64	-	8.10	At the end of first sentence in para 8.10 add the words”, where it is not detrimental to the street scene and local character”.	Agreed. Text has been amended accordingly.
65	-	10.3	At the end of the first sentence of para 10.3 after the words “Enclaves of development” insert the words “that are out of character in the locality”.	Agreed. Text has been amended accordingly.
66	-	11.9	In the first line of the first sentence of para 11.9 delete the word “normally” after the word “should”.	‘Normally’ provides some flexibility where the layout of residential property does not allow making such satisfactory arrangements.
67	-	11.10	At the end of the third sentence of para 11.10 after the words “or by landscaping” insert the words “avoiding garden areas in front of dwellings”.	Agreed. Text has been amended accordingly.
68	-	14.11	After the last sentence of para 14.11 add two new sentences that read: “Flat roofs should not normally be used as balconies and should only be accessed for maintenance purposes as nuisance and loss of privacy to immediate neighbours almost always results. This will normally be conditioned”.	Agreed. Text has been amended accordingly.
69	-	14.25	Replace the first sentence of para 14.25 with the following two sentences: “Flat roofs should not normally be used as balconies and should only be accessed for maintenance purposes as nuisance and loss of privacy to immediate neighbours almost always results. This will normally be conditioned”.	A cross reference to para 14.11 has been added.
70	-	14.44	Replace the figure “2.3” in the last sentence of the penultimate bullet point with the figure “2.5” so that it is consistent with the minimum ceiling height figure given in Table 2.2 of the draft Sustainable Design and Construction SPD (November 2012).	Agreed. Text has been amended accordingly.
71	-	15.2	Replace the first sentence of para 15.2 with the following sentence:	See response at 58 with regard to single family homes.

			"The residential suburbs of Barnet are characterised by houses in single family occupation and also have strong architectural character and streetscapes".	
72	-	15.3	In the second line of the first sentence of para 15.3, between the words "the local environment" and the word "and" insert the words "and areas characterised by single family houses".	See response at 58 with regard to single family homes.
73	-	15.4	Replace the third sentence of para 15.4 with: "However, even in such locations they can harm the character of areas characterised by single family houses and also by changing external appearance and increased noise and activity".	See response at 58 with regard to single family homes.
74	-	15.5	Replace the second sentence of para 15.5 with: "Conversion proposals are therefore resisted in areas of low density housing where there are single family houses and also where the external alterations needed including hardstanding as a parking space and refuse storage areas which would impact the appearance of the local area".	Para 15.5 has been amended to include the reference to refuse storage areas. See response at 58 with regard to single family homes.
75	-	15.6	After the first sentence in para 15.6, add a new sentence that reads: "Additionally, proposals to convert houses with less than five habitable rooms or with a Gross Internal Floor Area of less than 120 sq. Metres will normally be resisted".	Our approach to conversions is clearly set out at Policy DM01 (h)
76	-	15.6	After the second sentence of para 15.6, add a new sentence that reads: "Family sized flats of two bedrooms or more should normally be located on the ground floor and first floors of a property". After the last sentence of para 15.6 add a new sentence that reads: "Applications should demonstrate conformity with these standards by identifying on the submitted drawings and/or the Design and Access Statement the size of each flat, the bedroom sizes and the number of persons to be accommodated. Where a conversion includes accommodation in the roof space, appropriate section drawings should be submitted."	We do not consider that para 15.6 needs to change. This might not always be possible or practical in all circumstances and is dependent on the layout of the residential property (height, size, width).

77	-	15.7	Replace the last sentence of para 15.7 with a new sentence that reads: "Conversions should meet the outdoor amenity space standards set out in the SD&C SPD and will normally only be acceptable in properties that have useable rear gardens of more than 50 sq.metres".	Our approach to conversions is clearly set out at Policy DM01 (h). We consider that the flexibility provided by para 15.7 helps to implement our policy objectives with regards to conversions.
78	-	Figure 13	Figure 13 should be redrawn so that it does not depict typical suburban houses as these would not normally be considered - appropriate for conversion to flats under the Local Plan policies.	Figure 13 focuses on respecting the existing appearance of front of properties and is generally applicable across the residential suburb. New drawings for all suburban house types are therefore not merited.
79	-	15.13	Delete the reference to "(Table 1.1) in the second para of para 15.13 and replace with "(Table 1.3)". After the end of the second para headed "Minimum size of units" Insert a new paragraphs, that reads: "The Local Plan "Policy DM08 - Ensuring a variety of sizes of new homes to meet housing need" addresses the oversupply of small units since 2004. We will require developers to provide new homes that meet the housing needs of the Borough as is appropriate to the location of the proposed development and we will resist: Developments that include one person units except in exceptional circumstances, and b) Developments that provide second and third bedrooms with a floor area that is only marginally below the Appendix 2 (Table 1.3) standard for double/twin bedrooms but do not otherwise meet the London Plan Residential Space Standards for units with double/twin bedrooms."	Agreed. Text has been amended accordingly. Our approach to ensuring a variety of new homes sizes is clearly set out at Policy DM08 and this is consistent with the NPPF(para 50). Appendix 2, Table 1.3 already explains all bedroom types and sizes that are taken into account whilst considering planning applications for conversions.
80	-	15.18	Replace para 15.18 so that it reads: "As paras 11.10 and 11.11 above explains in detail, waste and recycling storage areas should normally be integrated within the building or provided out of sight avoiding garden areas in front of dwellings. When it will not detract from the existing street scene	First sentence agreed. Text has been amended accordingly.

			<p>and it is exceptionally necessary for them to be sited to the front of a property, they should be screened within an enclosure as depicted in Figure 15 or by landscaping.”</p> <p>Figure 15 should be redrawn so that it does not depict typical suburban houses as these would not normally be considered appropriate for conversion to flats under the Local Plan policies.</p> <p>The description underneath Figure 15 should be deleted and replaced by the words: “Sensitive use of landscaping can soften the impact of bin storage areas when it is exceptionally necessary for them to be sited to the front of a property.”</p>	<p>See response at 78</p> <p>Suggested text has been revised with removal of ‘exceptionally’.</p>
81	-	Glossary	Add the corrected definition of Habitable Room and the definition of PTAL included in the Glossary to the draft Sustainable Design and Construction SPD (November 2012) at Appendix 2.	Agreed. Text has been amended accordingly.
82	Environment Agency, North East Thames Area – Hatfield Team, Hatfield, AL10.	6.2	The end of the first sentence should be re-written to state “...adding to the positive aspects of the built <i>and natural</i> environment.”	Agreed. Text has been amended accordingly.
83	-	6.17	We support the use of native plant species for boundary planting.	We welcome this support
84	-	6.19 – 6.21	We suggest that another para is added to recommend the use of water butts to collect rainwater for watering gardens. Barnet residents have water use above the national average, and any techniques to reduce water use should be actively encouraged. A reference could then be made to section 2.11 (Water Efficiency) of the Sustainable Design and Construction SPD.	Para 6.21 incorporates a reference to water butts and a cross reference is made to the SD&C SPD.
85	-	6.21	We support the messages in this para.	We welcome this support
86	-	6.22 – 6.23	We suggest that another para is added to explain that	A new para 6.24 has been added with

			development should always aim to reduce any impacts on the surrounding natural environment by providing adequate - naturalised buffer zones, free of all development, adjacent to sensitive areas (e.g. rivers). There could also be more detail in this para about Green Infrastructure (GI) more generally: how it will provide green corridors for wildlife and amenity, connect green spaces in the urban landscape and help Barnet adapt to the impacts of climate change. Developers should ensure that GI is planned from the offset and that adequate space is allocated on site for GI.	regard to maximising the benefits of open spaces and the emerging Green Infrastructure SPD
87	-	6.22 -last bullet	This implies that landscaping can help to reduce flood risk, but does not make it clear how this is done. We would suggest that the bullet is expanded to read "...and reduce flooding <i>through the use of Sustainable Drainage Systems (SuDS)</i> . <i>SuDS are an approach to managing surface water runoff that seeks to mimic natural drainage systems and retain water on or near the site.</i> "	A cross reference to para 2.15.2, Table 2.15.1 (on SuDS) of the SD&C SPD has been added to the last bullet.
88	-	Principles (page 25)	We would suggest that a bullet point is added to reflect our buffer zone comment above, and a further bullet point to clarify the requirement for use of SuDS (as part of landscaping, e.g. making space for ponds, swales etc.).	We have added a new bullet point to Principles in Section 6 which highlights new development should aim to reduce any impacts on the surrounding natural environment by providing adequate - naturalised buffer zones, free of all development, adjacent to sensitive areas (e.g. rivers) and reduce flooding through the use of Sustainable Drainage Systems (SuDS).
89	-	7.12	We strongly support this para. Excessive lighting can have detrimental impacts on river corridors, buffer zones and the associated ecology (e.g. bats and fish), and these corridors should remain 'intrinsically dark' (0-2 lux). We therefore support any requirement to minimise impacts from lighting.	We welcome this support
90	-	Section 12 (Design of basements;	An additional para should be added to state that habitable basements/basement dwellings are considered 'highly vulnerable' in the flood risk vulnerability classification (see page 6 of the	Agreed a new para 12.3 has been added with regard to flood risk

		page 38)	Technical Guidance to the National Planning Policy Framework (NPPF)), and as such should not be permitted in Flood Zone 3, and should only be permitted in Flood Zone 2 following the application of the Sequential Test and Exception Test. This detail has not been included in your Core Strategy DPD or Development Management Policies DPD, so we feel it is important to make developers aware within this document.	
91	-	Section 14 (Extensions to houses; page 42)	We feel that an additional para should be added (preferably after para 14.4) to highlight that the Environment Agency has 'flood risk standing advice' available on our website for householder and other extensions in Flood Zones 2 and 3; this advice should not be applied if an additional dwelling is being created (e.g. a self-contained annex). The webpage for this information is: http://www.environment-agency.gov.uk/research/planning/82584.aspx .	Agreed a new para 14.5 has been added with regard to the Environment Agency's advice on flood risk.
92	-	14.36	The last sentence implies that building in gardens can have an impact on flood risk <i>in gardens</i> . However, the impacts of such development are likely to extend further than just garden flooding and could affect adjacent properties. Furthermore, the cumulative impacts of such developments in an area can exacerbate localised flooding issues. The sentence should be amended to reflect this.	The last sentence in para 14.36 has been amended to "Detached buildings in gardens can therefore have a significant impact on local character, amenity and flood risk in gardens as well as its surrounding areas".
93	-	14.44 (third bullet)	We are pleased to see that groundwater conditions have been mentioned as a point of consideration. We feel that this bullet should be expanded to explain what the impacts of basements can be on groundwater. Basements in sensitive locations can interrupt groundwater flow, which in turn can interrupt the baseflow to nearby rivers, and can also have a detrimental impact on local groundwater abstraction points.	We consider that this document is not the right platform to expand on the technicalities of ground water conditions and basements but the SD&C SPD is. This is already highlighted in section 2.15 of the SPD.
94	-	Para 16.4	We support this para. We are pleased that you are recommending the use of SuDS, permeable paving and soft landscaping to reduce surface water runoff from the creation of parking spaces in	We welcome this support

			front gardens.	
95	-	Other issues to consider (pages 66-68):	<p>We request that details of our requirements for a Flood Defence Consent are listed in this section. The para should be worded as follows:</p> <p>“In addition to planning permission (or permitted development), under the terms of the Water Resources Act 1991, and the Thames Region Land Drainage Byelaws 1981, prior written consent is required from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of any watercourse designated by the Environment Agency as a ‘main river’.</p> <p>A main river does not necessarily relate to the size of the watercourse, and can include smaller streams and culverted channels. The location of main rivers in Barnet can be found on the ‘What’s in your backyard?’ section of the Environment Agency website: http://www.environment-agency.gov.uk/homeandleisure/37793.aspx.</p> <p>It is recommended that developers/applicants seek the advice of the Environment Agency prior to submitting for planning permission or permitted development, as their consent may not be granted for the intended works.”</p>	Agreed a new para 17.17 has been added.
96	-	Further guidance (pages 76 – 77)	<p>We would appreciate a link to the planning section of our website in this list. The following link is to the planning section of our website and was last updated in December 2012:</p> <p>http://www.environment-agency.gov.uk/research/planning/default.aspx.</p>	Agreed. Further Guidance has been amended accordingly.
97	Hertsmere Council	General Comment	<p>With regards to the RDG SPD, officers consider that the document provides relevant and up to date guidance on best practice design principles and therefore have no specific comments to make.</p>	We welcome this support
98	Highways	General	<p>The Highways Agency will be concerned with proposals that have</p>	We welcome this acknowledgement

	Agency	Comment	the potential to impact the safe and efficient operation of England's Strategic Road Network (SRN). We have reviewed the consultation document and do not have any comments at this time.	
101	Tibbalds Planning and Urban Design Ltd, Agents on behalf of Middlesex University	3.3	Perhaps the clarity of where this design guidance is applicable could be improved. Many, if not most of the general design principles are universally applicable, yet the document states that it is aimed at those areas not covered by specific designations such as conservation areas and regeneration areas covered by Area Action Plans. These areas may well have their own design requirements, but they do not necessarily cover all of the design principles set out in the SPD. It may be helpful to clarify that the principles apply throughout the Borough, but that in the event of a conflict between the SPD and a more detailed set of guidance in an Area Action Plan or Conservation Area Management Plan, then the latter shall prevail.	Para 3.3 now clarifies that the design principles in the SPD apply throughout Barnet.
102	-	General Comments and Section 3	The general design principles at the end of each section are useful summaries and are supported. We note that the guidance draws on and refers to the Barnet Characterisation Study and the typologies identified therein. The University supports the stated caveat that the design guidance is not intended to stifle sensitive and imaginative design, particularly as there are instances where none of the typologies is directly relevant. Thus while the Campus Typology is relevant to the Hendon Campus and further development of academic and support facilities there, it is not relevant to residential development elsewhere. There is no typology that covers the proposed Student Village on the Peel Centre site, though the most relevant one is probably the Residential Estates one, with "variable building scales set in landscape and/or parking, with residential land use and a fine grain network of routes." We presume that the reference to a "distinct lack of clear structure, hierarchy and legibility" is merely descriptive of an existing characteristic on some estates that this should be avoided in the design of new development. This	<p>The focus of this SPD is on the residential streets primary typology.</p> <p>Barnet's Characterisation Study provides the background for the identification of the five primary typologies.</p> <p>We do not intend to produce similar boroughwide guidance for the other four primary typologies. Therefore each proposal will be treated on its merits.</p>

			intention could be made clearer.	
103	-	Table 3	We support the explicit reference to seminal national design guidance documents such as "By Design", "Safer Places" and "Secured by Design" .	We welcome this support
104	-	Section 5	In Section 5, " Achieving Appropriate Density", we strongly support the principle of optimising density to make the most effective use of land as a finite resource. We agree that density per se should not drive development, but is an important factor. Density guidelines, standards or limits should be regarded as one of the starting points in the design process, rather than a strict requirement to be followed, particularly in major redevelopment areas where urban scale development is being created and higher densities represent a consequence of good, sustainable urban design.	We welcome this support
105	-	6.1	While agreeing with the principles for "Enhancing Local Character", the University strongly welcomes the acknowledgement in Section 6.1, that there will be instances where the design of new development will establish a distinctive new local identity – the site of the proposed student village is a good example of this, particularly as it is in part severed from its surroundings by railway lines, major roads, and an industrial area.	As highlighted above at 102 proposals will be considered on their own merits.
106	-		We agree with the positive advantages cited of perimeter block urban structure, although there are clearly circumstances where other forms of development will be more or equally appropriate.	See response at 105
107	--	Section 6 principle	In the concluding set of principles at the end of Section 6 (p25) the meaning of the 4th bullet point (" . In gardens...") is not at all clear.	'in gardens' has been deleted from 4th bullet point.
108	-	7.5	We support the principles set out in Section 7 for safeguarding residential amenity. The acknowledgement in 7.5 is very helpful, that in regeneration schemes with higher densities (such as in Colindale) less than the proposed minimum of 21 metres between properties with facing windows may be acceptable and that innovative design solutions can avoid overlooking.	We welcome this support
			Car and cycle parking for university-related uses, including student	The text has been amended at paras

			<p>accommodation, is not adequately or accurately covered in the standards set out in the London Plan on which this SPD partly relies. It has been agreed with the Council that university-related needs should be adequately provided for, and that these need not relate to existing published standards but should be reflected in a travel plan. This is explicitly acknowledged in section 18.8 of the recently adopted Development Management Policies DPD, and should also be reflected in the wording in this SPD.</p>	<p>11.4 and 11.6 to cross –refer to section 18.8 in the Development Management Policies DPD.</p>
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