

<b><u>MEETING</u></b> <b>POLICY AND RESOURCES COMMITTEE</b>
<b><u>DATE AND TIME</u></b> <b>TUESDAY 13TH FEBRUARY, 2018</b> <b>AT 7.00 PM</b>
<b><u>VENUE</u></b> <b>HENDON TOWN HALL, THE BURROUGHS, LONDON NW4 4BG</b>

Dear Councillors,

Please find enclosed additional papers relating to the following items for the above mentioned meeting which were not available at the time of collation of the agenda.

Item No	Title of Report	Pages
1.	ANY OTHER ITEM(S) THE CHAIRMAN DECIDES ARE URGENT	3 - 26

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**Policy and Resources Committee**  
**13<sup>th</sup> February 2018**

<b>Title</b>	Response to Mayor of London’s Draft London Plan
<b>Report of</b>	Cllr Richard Cornelius
<b>Wards</b>	All
<b>Status</b>	Public
<b>Urgent</b>	Yes
<b>Key</b>	Yes
<b>Enclosures</b>	Appendix A – Member Briefing on Draft London Plan
<b>Officer Contact Details</b>	Nick Lynch – Planning Policy Manager 0208 359 4211 <a href="mailto:Nick.lynch@barnet.gov.uk">Nick.lynch@barnet.gov.uk</a> Ken Bean – Principal Policy Planner 0208 359 5393 <a href="mailto:Ken.bean@barnet.gov.uk">Ken.bean@barnet.gov.uk</a>

**Summary**

The Mayor of London is consulting on a new version of the London Plan. Representations received by 2<sup>nd</sup> March 2018 will then be considered by an independent Inspector at an Examination in Public anticipated to be held later this year. It is anticipated that the London Plan will then be finalised for publication in late 2019.

Once finalised the new London Plan will set the policy framework for local plan production by London Boroughs and all planning decisions will need to consider the published London Plan policies. Barnet’s emerging new Local Plan will therefore need to be drafted so as to be ‘in general conformity’ with the London Plan with any divergence from Mayoral policy requiring support of robust evidence.

Commenting on the current consultation draft affords the Council with the opportunity to ensure that representations are fully considered before the new London Plan is published.

The report is urgent as there will not be another meeting of P&R committee until

significantly after the consultation closing date of 2<sup>nd</sup> March. The report could not be drafted earlier as the briefing session for members of the Local Plan Members Advisory Group and Planning Committee did not take place until 8<sup>th</sup> February.

## **Recommendations**

- 1. That Committee notes the contents of the Mayor of London's current consultation Draft London Plan and agrees the matters that the Council intends responding on as set out in the attached briefing paper (Appendix A) circulated to and discussed by members of the Council's Local Plan Members Advisory Group and Planning Committee.**
- 2. Subject to agreeing recommendation 1, that the Committee authorise the Deputy Chief Executive, in consultation with the Leader, to finalise and send by 2<sup>nd</sup> March the Council's response to the Draft London Plan.**

### **1. WHY THIS REPORT IS NEEDED**

- 1.1 The London Plan is one of the most important documents that the Mayor of London is required to produce, shaping how London evolves and develops. Unlike the current 2016 consolidated London Plan, this is a new replacement Plan that sets out the current Mayor's overarching strategic planning framework from 2019 up to 2041.
- 1.2 The London Plan sets the policy framework for the production of local development plans across all London Boroughs. All planning decisions need to take account of published London Plan policies. Barnet's emerging new Local Plan will therefore need to be 'in general conformity' with the London Plan. Any divergence from Mayoral policy needs support of robust evidence.
- 1.3 The current 2016 consolidation London Plan remains the adopted Development Plan that planning applications should continue to be determined in accordance with. Whilst at an early stage, policies contained in the Draft London Plan (DLP) are however capable of being considered as material considerations in planning decisions and the DLP gains more weight as it moves through the process to adoption; however the weight given to the DLP is a matter for the decision maker.
- 1.4 Comprising of 114 policies and over 500 pages, the DLP is drafted in a more prescriptive way than the 2016 London Plan. There has been a

deliberate attempt to make policies less aspirational and instead enable them to be more directly applied at local level avoiding the need for them to be repeated in local plans. Six 'Good Growth' policies underpin the DLP seeking growth that is sustainable and supported by sufficient infrastructure that benefits all Londoners, and to ensure that all of London contributes towards addressing its housing needs.

- 1.5 There are no changes proposed to the site size thresholds that trigger the referral of applications to the Mayor (the Mayor of London Order 2008). Therefore, the Mayor will continue to have the ability to intervene in applications that are of 150 residential units or more; development over 30m height, and development on Green Belt / MOL.

### **London Plan Timetable**

- 1.6 Following the current consultation period (ending 2<sup>nd</sup> March) all submitted responses to the DLP will be published prior to consideration by an independent Planning Inspector, as appointed by the Secretary of State, to carry out an Examination in Public for the London Plan. Those who have made representations on the DLP may then also be invited to discuss and expand on their comments at the Examination in Public.

- 1.7 The anticipated timings for the next stages of the new London Plan are:

- Examination – Autumn 2018 (expected to last 3 months);
- Submission to MHCLG Secretary of State - Summer 2019;
- Publication (adoption) - Autumn 2019.

### **Proposed Response**

- 1.8 The DLP aims to increase housing supply from 42,000 to 65,000 new homes per annum. A detailed Briefing Note (Appendix A) has been produced for Members who sit on the cross party Local Plan Members Advisory Group as well as Members of the Borough Planning Committee. The Briefing Note focuses on 36 subjects / areas of particular interest to Barnet, setting out for each the existing and proposed London Plan policy stance together with an initial proposed response to the consultation.

- 1.9 The matters raised in the DLP as highlighted in the briefing note were discussed at the special meeting of the Local Plan Members Advisory Group held on 8<sup>th</sup> February. Particular concerns on the DLP highlighted by Members included:

- Continued car use in the lower density suburbs of Outer London remains a reality, irrespective of public transport service and reliability improvements. We therefore advocate more flexibility to

support more local evidence based approaches to car parking which are marginally less restrictive than the London Plan for residential development.

- The adverse impact of more restrictive parking standards for new development, particularly in the northern part of the borough. The London Plan needs to recognise that even with improvements to public transport, walking and cycling routes, reliance on the car will remain important in outer London boroughs and therefore use of the car in these locations should not be made more difficult than it needs to be;
- The need to prioritise the provision of improved orbital transport links – including for both train and bus;
- Serious concerns about the proposed new housing target numbers and the potential adverse impacts that excessive densification and intensification may have;
- The failure to acknowledge that Barnet's contribution to London's housing delivery has been driven by major and complex regeneration schemes. These opportunities for brownfield development are not limitless. Following the delivery of Barnet's comprehensive regeneration programme there is a distinct lack of additional large brownfield sites;
- Barnet's need to ensure an appropriate choice of housing for its residents, including recognition of the need for family homes and protecting houses from inappropriate conversion into flats.

## **2. REASONS FOR RECOMMENDATIONS**

- 2.1 To ensure that Barnet Council's representations on the Mayor's DLP are fully considered at the forthcoming Examination in Public.

## **3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED**

- 3.1 The alternative option is to not to respond to the DLP. Failure to make representations on the DLP would be a missed opportunity for ensuring that Barnet's position is properly reflected in the next version of the London Plan.

## **4. POST DECISION IMPLEMENTATION**

- 4.1 Once adopted, the final version of the London Plan will be a material consideration in the determination of future planning applications.

## **5. IMPLICATIONS OF DECISION**

### **5.1 Corporate Priorities and Performance**

- 5.1.1 The Corporate Plan 2015-2020 highlights the following corporate priority:
- Promote responsible growth within the Borough, encouraging development and success, revitalising communities whilst protecting what residents love about the Borough. This response to the DLP helps to promote this message to the

Mayor.

## **5.2 Resources (Finance & Value for Money, Procurement, Staffing, IT, Property, Sustainability)**

5.2.1 There are no direct cost implications of responding to the Mayor's DLP.

## **5.3 Social Value**

5.3.1 The Public Services (Social Value) Act 2012 requires people who commission public services to think about how they can also secure wider social, economic and environmental benefits.

## **5.4 Legal and Constitutional References**

5.4.1 The legal provisions for the London Plan are in Part VIII of the Greater London Authority (GLA) Act 1999 (as amended) in sections 334 to 341. The requirement for the Mayor to undertake an Examination in Public before publishing the final version of his Spatial Development Strategy is covered in Section 338.

5.4.2 Constitution, Article 7, paragraph 7.5 Responsibility for Functions sets out the Policy and Resources Committee's terms of reference including '(1) To be responsible for strategic policy...[and] Local Plans (except matters reserved to Full Council)' and (2) to be responsible for those matters not specifically allocated to any other committee affecting the affairs of the Council'.

## **5.5 Risk Management**

5.5.1 The management of risk is undertaken on a continual basis and reported as part of the Council's Quarterly Performance regime and considered as part of the Performance and Contract Management Committee quarterly monitoring report. Risks are managed through the project boards and are reviewed and revised at board meetings.

5.5.2 Failure to make representations on the DLP is likely to result in less awareness of Barnet priorities being adequately reflected in the new London Plan.

## **5.6 Equalities and Diversity**

5.6.1 The Equalities and Diversity Act, 2010 outlines the provisions of the Public Sector Equalities Duty which requires Public Bodies to have due regard to the need to:-

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act, 2010;
- Advance equality of opportunity between people of different groups; and
- Foster good relations between people from different groups.

5.6.2 In preparing the London Plan, the Mayor of London will need to take full account of the demographic data of the increasingly diverse nature of the city

and how this relates to the nine characteristics protected under the Equality Act 2010 namely:

- Age
- Disability
- Gender reassignment
- Marriage/civil partnership
- Pregnancy and maternity
- Race and ethnicity
- Religion or belief
- Sex
- Sexual orientation.

5.6.3 When the Council produces the Barnet Local Plan an Equalities Impact Assessment will be undertaken This will similarly ensure that full account is taken of demographic data, and the impacts on different protected groups.

## **5.7 Consultation and Engagement**

5.7.1 Prior to publishing a revised version of the London Plan, the Mayor of London is required to undertake a full public consultation on a draft version of a replacement London Plan, and following that arrange for an Examination in Public to be held to consider representations.

## **6 BACKGROUND PAPERS**

6.1 Mayor of London's Draft London Plan <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>

## Member Briefing on Draft London Plan<sup>1</sup>

This Briefing focuses on 36 subject (areas of interest) to Barnet within Draft London Plan setting out existing and proposed London Plan policy together with Barnet context and an initial response to the consultation.

<b>2016 London Plan Designation / Policy</b>	<b>New Draft London Plan (DLP) Designation / Policy</b>	<b>Initial Barnet Response</b>
<p><b>Style and applicability of policies</b></p> <ul style="list-style-type: none"> <li>➤ Policies drafted to be applied at 3 different levels – strategic, planning decisions and LDF (Local Plan) preparation.</li> <li>➤ Includes a section covering Outer London - specific policies on vision and strategy, economy and transport.</li> </ul>	<ul style="list-style-type: none"> <li>• Policies drafted in more prescriptive way and are no longer split into the three levels.</li> <li>• Intention to make London Plan policies more directly applicable reducing need to interpret and effectively duplicate them in Local Plans.</li> <li>• For a number of matters the DLP expects boroughs to undertake additional work (e.g. preparing area-wide design codes). These would have significant resource implications for boroughs at a time when resources are limited.</li> <li>• No specific policy recognition for Outer London.</li> </ul>	<p>London-wide policies don't reflect differing character and contexts across boroughs. DLP should:</p> <ul style="list-style-type: none"> <li>• provide scope for local circumstances to be taken into account in Local Plan</li> <li>• include specific policy recognition for outer London</li> <li>• make clear that additional work such as design codes is advisory and not a requirement.</li> </ul>
<p><b>Collaboration with the Wider South East</b> re: London's needs:</p> <ul style="list-style-type: none"> <li>➤ Overall strategy of seeing to accommodate population and economic growth over plan period (up until 2036) within boundaries of Greater London.</li> <li>➤ Investment in social and physical infrastructure needed to support growth sustainably and agreement with authorities and agencies at all levels to ensure wise and efficient use of resources.</li> </ul>	<p><i>GG2 Making the best use of land</i>  <i>GG5 Growing a good economy</i>  <i>SD2 Collaboration in the Wider South East</i>  <i>SD3 Growth Locations in the Wider South East and beyond</i></p> <ul style="list-style-type: none"> <li>• Plan aims to accommodate all of London's growth within its boundaries and without intruding on its Green Belt or other protected land.</li> <li>• Mayor will work with partners across the Wider South East to address appropriate regional and sub-regional challenges and opportunities and in finding solutions to shared strategic concerns such as barriers to housing and infrastructure delivery, factors influencing economic prosperity, tackling climate change, environmental improvements and waste management.</li> </ul>	<ul style="list-style-type: none"> <li>• Support growth corridors into the South East linked to radial infrastructure but highlight need for orbital growth.</li> <li>• Managing relationships with neighbouring authorities through a "non-statutory strategic structure" is inadequate as dependent on coalitions of the willing.</li> <li>• Implications for South East from high risk strategy of a more prescriptive London Plan ie London can't deliver growth within it's boundaries</li> </ul>

<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>

**APPENDIX A – INITIAL RESPONSE ON DRAFT LONDON PLAN**

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<p><b>1. Opportunity Areas in Barnet</b></p> <p>i) Colindale / Burnt Oak</p> <p>ii) Cricklewood / Brent Cross.</p> <ul style="list-style-type: none"> <li>➤ Plan includes annex providing details of each Opportunity Area in terms of area, indicative employment capacity, minimum new homes and narrative detailing progress made and the extent, scale and complexity of each.</li> </ul>	<p><i>SD 1 Opportunity Areas</i></p> <p><i>SD 10 Strategic and local regeneration</i></p> <ul style="list-style-type: none"> <li>• New Southgate (2,500 new homes and 3,000 new jobs) added to existing Barnet Opportunity Areas predicated on Crossrail 2, for which 2033 is the aimed for opening date.</li> <li>• Northern part of Crossrail 2 (Lee Valley OA, Wood Green / Haringey Heartlands OA and New Southgate OA) taken together expected to deliver 28,000 new homes and 18,500 new jobs.</li> <li>• Reference to West London Orbital unlocking significant new growth</li> <li>• Annex on Opportunity Area progress deleted</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome strong support for Crossrail 2. New Southgate station to play key role in unlocking growth in eastern Barnet</li> <li>• Highlight need for prioritisation / earlier delivery of West London Orbital</li> <li>• DLP should acknowledge contributions of Brent Cross Cricklewood and Colindale to London's growth</li> </ul>
<p><b>2. Areas for Intensification in Barnet</b></p> <p>i) Mill Hill East.</p>	<p>Intensification Areas removed from the Draft London Plan</p>	<p>We question why these have been removed. Millbrook Park could be considered an example of good growth in Outer London</p>
<p><b>3. Retail &amp; Town Centre Development</b></p> <ul style="list-style-type: none"> <li>➤ Boroughs to identify future levels of retail and other commercial floorspace need.</li> <li>➤ Firmly resist inappropriate out of centre development.</li> <li>➤ Manage existing out of centre retail and leisure development in line with sequential approach, seeking to reduce car dependency and improve public transport, cycling and walking.</li> </ul>	<p><i>GG2 Making the best use of land</i></p> <p><i>GG5 Growing a good economy</i></p> <p><i>SD6 Town centres</i></p> <p><i>SD7 Town centre network</i></p> <p><i>SD8 Town centres: development principles and DPDs</i></p> <p><i>HC6 Supporting the night-time economy</i></p> <ul style="list-style-type: none"> <li>• Strong town centres first approach to make the most of agglomeration benefits and accessibility of town centres and ensure sustainable patterns of development.</li> <li>• Identify centres with particular scope to accommodate higher density housing.</li> <li>• Identify sites suitable for higher density mixed-use residential intensification.</li> <li>• Redevelopment of retail and leisure parks encouraged to deliver housing intensification.</li> <li>• Promote night-time economy in town centres where night tubes and buses are available</li> </ul>	<ul style="list-style-type: none"> <li>• Successfully integrating significantly higher density growth and different land uses within the character of established existing centres will prove challenging.</li> <li>• Concern about detrimental impacts of excessive amounts of new higher density housing may have on character of town centres.</li> <li>• Best use of land does not always mean higher densities</li> <li>• Support more night-time economic activity provided that the amenity of neighbouring uses is fully considered.</li> </ul>

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<p><b>4. Strategic Industrial Locations (SIL)</b></p> <ul style="list-style-type: none"> <li>➤ North London Business Park (NLBP) only SIL in Barnet.</li> </ul>	<ul style="list-style-type: none"> <li>• NLBP removed - no SIL sites identified in Barnet.</li> <li>• Staples Corner in LB Brent retains its SIL designation.</li> <li>• Greater flexibility to accommodate wider benefits of good growth in SIL</li> </ul>	<ul style="list-style-type: none"> <li>• Support proportionate and pragmatic approach to opportunities for growth in SIL.</li> </ul>
<p><b>5. Borough Housing Target</b></p> <ul style="list-style-type: none"> <li>➤ Annual London housing target to provide 42,000 net additional homes per year.</li> <li>➤ Boroughs seek to achieve and exceed minimum borough targets.</li> <li>➤ Barnet's minimum ten year target (2015-2025) – 23,489 giving an annual average housing supply monitoring target of 2,349.</li> </ul>	<p><i>GG4 Delivering the homes Londoners need</i> <i>H1 Increasing Housing Supply</i></p> <ul style="list-style-type: none"> <li>• London-wide Strategic Housing Market Assessment (SHMA) identified need for 66,000 additional homes per year and Strategic Housing Land Availability Assessment (SHLAA) capacity for c40,000 new homes a year on large sites (0.25ha and above) and 24,500 on small sites.</li> <li>• Barnet's housing target increased by 33% to 31,340 (2019/20 to 2028/29) equating to 3,134 new homes annually.</li> <li>• 4<sup>th</sup> highest after Newham, Tower Hamlets and Greenwich</li> <li>• Compares to increases of Brent 33%, Camden 22%, Enfield 135%, Haringey 30%, Harrow 134%.</li> <li>• Housing delivery to be optimised on all suitable and available brownfield sites; particularly those with existing or planned PTAL of 3-6 or located within 800m of a tube or rail station or District level and above town centre boundary, mixed use re-development of car parks and low density retail parks, intensification on appropriate low density sites in other uses, surplus utilities and public sector owned sites and small sites.</li> </ul>	<ul style="list-style-type: none"> <li>• Object to increase - Barnet cannot continue present levels of growth without impacting adversely on local character, infrastructure and services and the qualities that attract people to live here.</li> <li>• Complex long term regeneration schemes accounting for Barnet's high target mean that we struggle to meet London Plan target.</li> <li>• In 2016/17 record completions of 2,230 new homes in Barnet.</li> <li>• Incremental impact of intensification / densification on Barnet's suburban character.</li> <li>• After major regeneration areas and housing estate renewal schemes have been completed, this will put pressure on the continued protection of Barnet's Green Belt, MOL and other open / green spaces.</li> <li>• Barnet have commissioned a West London SHMA</li> <li>• Question capacity of construction sector, in terms of skills and materials, to deliver</li> </ul>
<p><b>6. Small Sites</b></p> <ul style="list-style-type: none"> <li>➤ No current equivalent London Plan policy.</li> </ul>	<p><i>GG4 Delivering the homes Londoners need</i> <i>H2 Small Sites</i></p> <ul style="list-style-type: none"> <li>• New Small Sites setting 10 year borough targets for net completions on sites under 0.25ha in size.</li> <li>• Barnet's figure - 12,040 (1204 annually) - is the 2<sup>nd</sup> highest</li> </ul>	<ul style="list-style-type: none"> <li>• Object to high small sites target number and the lack of collaborative GLA working with boroughs on the SHLAA to arrive at the borough figures.</li> <li>• Policy not required – presumption in</li> </ul>

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	<p>borough figure. Croydon is 1<sup>st</sup> (15,110)</p> <ul style="list-style-type: none"> <li>• Presumption in favour of small housing developments between one and 25 homes.</li> <li>• Local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in density.</li> <li>• Prepare area-wide design codes to promote good design and proactively encourage increased housing provision and higher residential densities on small housing developments.</li> <li>• Incremental intensification of existing residential areas within PTALs 3-6 and within 800m of a tube / rail station or town centre boundary.</li> <li>• Mayor to set out design principles for small housing schemes across London that boroughs should draw on and supplement when preparing design codes.</li> </ul>	<p>favour of development already in NPPF</p> <ul style="list-style-type: none"> <li>• Design codes increases resource burdens for boroughs by removing prospect of pre application discussions and fees.</li> <li>• Impacts on supply of family houses</li> <li>• Prevents potential other uses on a site</li> <li>• Ad hoc piecemeal approach which undermines making better use of land</li> </ul>
<p><b>7. Affordable Housing Targets</b></p> <ul style="list-style-type: none"> <li>➤ At least 17,000 more affordable homes per year.</li> <li>➤ No strategic threshold London wide percentage set.</li> <li>➤ Barnet’s Local Plan sets a 40% borough-wide target for affordable housing.</li> </ul>	<p><i>GG4 Delivering the homes Londoners need</i>  <i>GG5 Growing a good economy</i>  <i>H5 Delivering Affordable Housing</i></p> <ul style="list-style-type: none"> <li>• Strategic target of 50% new homes delivered across London to be affordable.</li> <li>• Public sector land to deliver at least 50% affordable housing across its portfolio</li> <li>• Strategic partners with agreement with Mayor aiming to deliver at least 60% affordable housing across their portfolio.</li> <li>• Delivery of affordable housing to be maximised in Opportunity Areas.</li> </ul>	<ul style="list-style-type: none"> <li>• Concerns about ability to deliver the 50% strategic London wide affordable housing target</li> <li>• Concerns that 50% affordable housing will be delivered on public sector sites such as TfL land. Numbers led approach conflicts with design led approach of DLP.</li> </ul>
<p><b>8. Affordable Housing Site Threshold</b></p> <ul style="list-style-type: none"> <li>➤ No minimum London wide threshold percentage set for developments in current London Plan.</li> </ul>	<p><i>H6 Threshold Approach to Applications</i>  Draft policy reflects the position set out in the Mayor’s Affordable Housing SPG adopted in 2017 including:</p> <ul style="list-style-type: none"> <li>• Minimum 35% affordable housing threshold set for</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome the 35% threshold and fast-track approach to viability to incentivise delivery.</li> <li>• Question the appropriateness and ability</li> </ul>

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<ul style="list-style-type: none"> <li>➤ Affordable housing normally required on sites with capacity for more than 10 units in accordance with national guidance.</li> </ul>	<p>schemes more than 10 units / 1000sqm (threshold to be reviewed in 2021 via SPG).</p> <ul style="list-style-type: none"> <li>• Additional 50% target for public sector and employment site releases, plus 60% with GLA partners.</li> <li>• Threshold approach to viability assessment, fast track/no viability assessment if 35% delivered set out in policy.</li> </ul>	<p>of the Mayor to alter London Plan via Mayoral SPG.</p>
<p><b>9. Affordable Housing Tenure Mix</b></p> <ul style="list-style-type: none"> <li>➤ Affordable housing defined as comprising social rented, affordable rented and intermediate housing.</li> <li>➤ Tenure targets of 60% social and affordable rent, 40% intermediate rent or sale.</li> </ul>	<p><i>H7 Affordable Housing Tenure</i> Reflects position set out in Mayor’s Affordable Housing SPG including the following tenure mix sought:</p> <ul style="list-style-type: none"> <li>• 30% minimum low cost rented (comprising Social / London Affordable Rent)</li> <li>• 30% minimum intermediate</li> <li>• 40% to be determined by relevant borough based on identified need.</li> </ul>	<ul style="list-style-type: none"> <li>• Recognise new non-conventional housing products in relation to affordable housing will arise.</li> <li>• Adds to complex policy landscape</li> <li>• We need a clearly understood and applied Londonwide definition of affordable housing.</li> </ul>
<p><b>10. Dwelling Size</b></p> <ul style="list-style-type: none"> <li>➤ No current equivalent London Plan Policy.</li> <li>➤ Barnet sets out dwelling mix priorities for intermediate (3 to 4 beds), market (4 beds) and social rent (3 beds)</li> </ul>	<p><i>H12 Housing Size Mix</i></p> <ul style="list-style-type: none"> <li>• Emphasises that Boroughs should not set prescriptive dwelling size mix requirements (in terms of numbers of bedrooms) for market and intermediate homes</li> </ul>	<ul style="list-style-type: none"> <li>• Barnet have commissioned a West London SHMA to help identify existing priorities</li> <li>• London needs a balanced population and has to provide family sized homes in a suburban context</li> </ul>
<p><b>11. Build to Rent</b></p> <ul style="list-style-type: none"> <li>➤ No current equivalent London Plan Policy.</li> </ul>	<p><i>H13 Build to Rent</i> New policy that:</p> <ul style="list-style-type: none"> <li>• Seeks affordable housing in perpetuity in developments of 50 units and above.</li> <li>• Sets criteria for a Build to Rent scheme.</li> <li>• mixed schemes with proportions of Build to Rent and market sale only Build to Rent element suitable for the affordable housing offer of solely Discounted Market Rent.</li> </ul>	<p>Welcome new policy on a tenure that can make a greater contribution to housing supply but we caution about adding increased complexity.</p>
<p><b>12. Specialist Housing for Older People</b></p> <ul style="list-style-type: none"> <li>➤ No current policy but indicative annualised benchmarks given in Annex</li> </ul>	<p><i>H15 Specialist Older Persons Housing</i></p> <ul style="list-style-type: none"> <li>• Annual target figure for specialist older persons housing set in policy.</li> </ul>	<ul style="list-style-type: none"> <li>• Agree the C2 and C3 use class distinctions but question the basis of partnership working and robustness of</li> </ul>

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<p>5 of London Plan.</p> <ul style="list-style-type: none"> <li>➤ Barnet figure 225 (highest Borough fig).</li> </ul>	<ul style="list-style-type: none"> <li>• Barnet’s 275 unit annual benchmark figure (2017-2029) for specialist older persons housing (C3) is the highest Borough figure set.</li> <li>• Sheltered accommodation and extra care accommodation considered as C3 housing.</li> <li>• Residential nursing care accommodation is C2 use as it provides non self-contained residential accommodation for people requiring additional personal or nursing care.</li> </ul>	<p>evidence to support Barnet’s high annual figure.</p> <ul style="list-style-type: none"> <li>• Oppose prescriptive inclusion of the figure within London Plan policy, preferring this matter to be addressed locally without the imposition of ‘top down’ targets.</li> </ul>
<p><b>13. Gypsy and Traveller accommodation</b></p> <ul style="list-style-type: none"> <li>➤ No current equivalent London Plan Policy.</li> <li>➤ Reference to accommodation requirements of gypsies and travellers included in policy on housing choice.</li> <li>➤ Sites to be identified in line with national policy.</li> </ul>	<p><i>H16 Gypsy and Travellers accommodation</i></p> <ul style="list-style-type: none"> <li>• New definition proposed for gypsies and travellers due to concerns that existing Government planning definition fails to recognize those who have ceased to travel or live in (bricks and mortar) housing.</li> </ul>	<ul style="list-style-type: none"> <li>• Question justification for decision to depart from national definition of travellers.</li> <li>• Barnet have commissioned a West London assessment for gypsies and travellers accommodation needs</li> <li>• Likely to result in increase in the assessed need for pitches across London.</li> </ul>
<p><b>14. Housing Density and Local Character</b></p> <ul style="list-style-type: none"> <li>➤ Current policy optimising housing potential uses a residential density matrix based on public transport accessibility levels (PTAL) to determine densities on site.</li> <li>➤ For 3 settings (central, urban and suburban), different unit sizes min and max density ranges are prescribed dependent on PTAL levels.</li> <li>➤ Boroughs should consider the different characteristics of their areas to identify landscapes, buildings and places where that character should be sustained, protected and enhanced through managed change.</li> </ul>	<p><i>GG2 Making the best use of land</i>  <i>D2 Delivering Good Design</i>  <i>D6 Optimising Housing Density</i></p> <p>These policies set out the approach to optimising housing density key aspects are:</p> <ul style="list-style-type: none"> <li>• Move away from use of residential density matrix.</li> <li>• Promotes the most efficient use of sites.</li> <li>• LPAs and developers expected to agree densities on a site by site basis with no maximum densities set.</li> <li>• Design-led approach to optimizing housing density.</li> <li>• Need on most sites to develop at densities above those of the surrounding area.</li> <li>• Incremental change anticipated in outer London where suburban pattern of development has significant potential for residential intensification.</li> <li>• Higher density development to require higher levels of</li> </ul>	<ul style="list-style-type: none"> <li>• Plan indicates that suburbs will be expected to change and become denser.</li> <li>• Whilst there is emphasis on existing character, serious concern that in outer London boroughs character may be sacrificed to meet growth.</li> <li>• ‘Good growth’ and mixed and balanced communities requires provision of a commensurate supporting social infrastructure and the importance of placemaking – need to ensure development of TfL station sites delivers this and does not adversely impact on local areas.</li> <li>• Resource implications of undertaking design analysis and producing design</li> </ul>

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	scrutiny of design. • Developments that fail to optimise housing density of the site should be refused.	codes to manage development will necessitate extra work as Barnet has limited analysis to date.
<b>15. Housing Choice</b> ➤ 90% new housing to meet M4(2) accessible and adaptable dwellings. ➤ 10% new build dwellings to be designed to be wheelchair accessible or easily adaptable for wheelchairs	<b>D5 Accessible Housing</b> • At least 10% new build dwellings to be designed as wheelchair accessible or easily adaptable for wheelchairs • All other new build dwellings to be accessible and adaptable dwellings.	Support.
<b>16. Green Belt</b> ➤ Supports current extent of London’s Green Belt, its extension where appropriate and protection from inappropriate development.	<b>G2 London’s Green Belt</b> • Policy strengthens protection of the Green Belt. • Extension of Green Belt supported where appropriate. • De-designation not supported – stronger policy stance taken than that set out in NPPF.	<ul style="list-style-type: none"> <li>• Support but reserve right to make Green Belt boundary changes via Local Plan process where they can be justified.</li> <li>• Green Belt study commissioned</li> <li>• Need to recognise opportunities for release within London’s Green Belt such as around rail stations</li> <li>• Question justification for taking a stronger policy line than that set out in the NPPF.</li> </ul>
<b>17. Metropolitan Open Land</b> ➤ Support current extent MOL, extension where appropriate and protection from development having adverse impact on openness. ➤ Alterations to MOL via Local Plan process. ➤ Four criteria given for designating MOL.	<b>G3 Metropolitan Open Land</b> • No fundamental changes in policy stance / intention or content.	Agree.
<b>18. Green Infrastructure and Urban Greening</b> ➤ Plan positively for creation, protection, enhancement and management of networks of green infrastructure. ➤ Boroughs should identify areas where	<b>GG3 Creating a healthy city</b> <b>G1 Green Infrastructure</b> <b>G4 Local green and open space</b> <b>G5 Urban greening</b> <b>G7 Trees and woodlands</b> <b>G8 Food growing</b>	<ul style="list-style-type: none"> <li>• Broad support for the green infrastructure approach set out in DLP.</li> <li>• Barnet’s recently adopted Green Infrastructure SPD reflects and is consistent with DLP policies on Green Infrastructure and Natural Environment.</li> </ul>

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<p>urban greening and green infrastructure can contribute to mitigating effects of climate change.</p> <ul style="list-style-type: none"> <li>➤ Boroughs may wish to develop more detailed policies that support development of green roofs and greening of development sites.</li> <li>➤ Additional two million trees in London by 2025 to help mitigation of and adaption to climate change.</li> </ul>	<ul style="list-style-type: none"> <li>• Commitment to make London at least 50% green and to increase tree cover in London by 10% by 2050.</li> <li>• Providing wide range of social, health and environmental benefits, green and open spaces are a vital component of London’s infrastructure.</li> <li>• Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity, flood management, health and wellbeing, sport and recreation.</li> <li>• Review and update existing All London Green Grid SPG.</li> <li>• Boroughs to undertake a needs assessment of local green and open space to inform policy.</li> <li>• Loss of green and open spaces resisted in areas of deficiency.</li> <li>• Boroughs to develop an Urban Greening Factor to identify amount of urban greening required in new developments.</li> <li>• Protect existing allotments and encourage provision of space for community gardening and identification of sites for commercial food production.</li> </ul>	

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<p><b>19. Fire Safety</b></p> <ul style="list-style-type: none"> <li>➤ No specific fire safety policy in current London Plan.</li> <li>➤ Plan does however have a safety, security and resilience to emergency policy that includes reference to fire.</li> <li>➤ Development should include measures to design out crime, deter terrorism and help mitigate its effects.</li> </ul>	<p><i>GG6 Increasing efficiency and resilience</i>  <i>D3 Inclusive Design</i>  <i>D10 Safety, security and resilience to emergency</i>  <i>D11 Fire Safety</i></p> <p>The Grenfell Tower disaster and terrorism are reflected in changes to policy.</p> <ul style="list-style-type: none"> <li>• DLP includes policies to create a safe and secure environment resilient against impact of emergencies including fire and terrorism.</li> <li>• Maximise building resilience and minimise potential physical risks, including those arising as a result of fire, floor and related hazards.</li> <li>• All major development proposals to be accompanied by an independent ‘Fire Statement’ produced by a third-party assessor.</li> <li>• Development should include measures to design out crime, deter terrorism and help mitigate its effects.</li> </ul>	<ul style="list-style-type: none"> <li>• Understandable rationale for this approach</li> <li>• Requiring a Fire Statement for major development is potentially straying into non-planning matters.</li> <li>• Robust assessment of such statements could prove challenging for many boroughs.</li> <li>• Public realm design needs to take account of / be resilient to terrorism.</li> </ul>
<p><b>20. Ensuring equal life chances for all and improving health and addressing health inequalities (p91)</b></p> <ul style="list-style-type: none"> <li>➤ Ensuring equal life chances for all and work to reduce health inequalities and improve health of all Londoners.</li> <li>➤ Promote London as healthy place for all.</li> <li>➤ Identify and address significant health issues.</li> <li>➤ Promote places that are safe, accessible and encourage social cohesion.</li> <li>➤ Integrate policies to promote health and wellbeing of communities.</li> </ul>	<p><i>GG1 Building strong and inclusive communities</i>  <i>GG3 Creating a healthy city</i>  <i>E11 Skills and opportunities for all</i></p> <ul style="list-style-type: none"> <li>• Increased focus given in the Plan with inclusion of over-arching good growth policies emphasising need for planning and development to ensure delivery of strong and inclusive communities founded on openness, diversity and equality and reduce health inequalities.</li> </ul>	<p>Support.</p>

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<p><b>21. Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>➤ Ensure adequate social infrastructure provision is made to support new developments.</li> <li>➤ Identify and address significant health and social care issues.</li> <li>➤ Proposals resulting in a loss of social infrastructure in areas of need should be resisted.</li> </ul>	<p><i>GG5 Growing a good economy</i>  <i>S1 Developing London’s social infrastructure</i>  <i>S2 Health and social care facilities</i>  <i>S3 Education and childcare facilities</i>  <i>S4 Play and informal recreation</i>  <i>S5 Sports and recreation facilities</i></p> <ul style="list-style-type: none"> <li>• Boroughs to undertake a needs assessment of social infrastructure and identify sites for future provision.</li> <li>• New facilities should be easily accessible by public transport, cycling and walking.</li> <li>• Schemes resulting in a loss of social infrastructure (includes health, provision, education, community and recreation) as well as green infrastructure in “areas of defined need” should be refused unless able to be re-provided.</li> <li>• Redundant social infrastructure to be considered for other social infrastructure types before any alternative development.</li> </ul>	<ul style="list-style-type: none"> <li>• Support policies and investment in infrastructure but would welcome more support from Mayor in helping to deliver infrastructure</li> <li>• Detailed planning for social infrastructure is best achieved at the borough level so as to ensure proper account is taken of the different needs and priorities of individual communities and neighbourhoods.</li> </ul>
<p><b>22. Public Toilets</b></p> <ul style="list-style-type: none"> <li>➤ No current London Plan policy.</li> </ul>	<p><i>S6 Public toilets</i></p> <ul style="list-style-type: none"> <li>• Large scale commercial developments open to the public e.g. shops and leisure facilities should provide and secure future management of free publicly-accessible toilets.</li> </ul>	<p>Support policy on provision of public toilets in large publicly accessible developments.</p>
<p><b>23. Offices</b></p> <ul style="list-style-type: none"> <li>➤ Mixed use development and redevelopment should support consolidation and enhancement to the quality of the remaining office stock.</li> </ul>	<p><i>GG5 Growing a good economy</i>  <i>E1 Offices</i></p> <ul style="list-style-type: none"> <li>• Diverse office markets in outer London should be consolidated and where viable, extended focusing new development in town centres and other existing office clusters.</li> <li>• Existing viable office space in outer London locations should be retained and to ensure that office functions are not undermined by permitted development rights support given for introduction of Article 4 Directions.</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome support for Article 4 Directions to address adverse impacts of office to residential permitted development rights.</li> <li>• Between May 2013 and January 2018 Barnet lost 37,829sqm of office space from the completion of 69 prior approval applications (delivering 647 new homes).</li> </ul>

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<p><b>24. Low cost business space and affordable workspaces</b></p> <ul style="list-style-type: none"> <li>➤ No specific policy on low cost or affordable workspace but reference is made in policy on new and emerging economic sectors to needing to ensure availability of a range of workspaces, including start-up space, co-working space and ‘grow-on’ space.</li> </ul>	<p><i>E2 Low-cost business space</i>  <i>E3 Affordable workspace</i>  <i>HC5 Supporting London’s culture and creative industries</i></p> <ul style="list-style-type: none"> <li>• Provision and protection of range of low cost B1 business space for SMEs should be supported.</li> <li>• B1 proposals over 2500sqm to consider providing a proportion of flexible workspace for SMEs.</li> <li>• In defined circumstances planning obligations may be used to secure affordable workspace at rents held below the market rate.</li> <li>• Affordable workspace element should be operational before any residential elements are occupied.</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome policy support for small businesses and objectives of providing and protecting low cost business space, securing affordable workspace and promoting contributions to employment, apprenticeships and training opportunities.</li> <li>• Barnet has made progress through SPD on securing contributions to skills, employment, enterprise and training</li> <li>• Highlight evidence from Barnet’s Employment Land Review</li> </ul>
<p><b>25. Industrial land</b></p> <ul style="list-style-type: none"> <li>➤ Identify and protect locally significant industrial sites where justified by evidence of demand.</li> <li>➤ Consider potential for surplus industrial land to help meet requirements for a mix of other uses including housing and social infrastructure.</li> <li>➤ Release of surplus industrial land to be focused around public transport nodes to enable higher density development, especially for housing.</li> </ul>	<p><i>E6 Locally Significant Industrial Sites</i>  <i>E7 Intensification, co-location and substitution of land for industry, logistics and services</i>  <i>E8 Sector growth opportunities and clusters</i></p> <ul style="list-style-type: none"> <li>• Boroughs should define site boundaries making clear the range of industrial and related uses acceptable.</li> <li>• Employment areas should be intensified to use land more efficiently.</li> <li>• Significant industrial and logistics capacity serving London outside the capital, policy recognises scope for some substitution of London’s industrial capacity to locations in the wider region where this results in mutual advantage.</li> </ul>	<ul style="list-style-type: none"> <li>• Barnet has lost a significant amount of employment space to residential uses in recent years, largely precipitated by changes to the Use Classes Order.</li> <li>• London Plan should recognise the economic potential in, and importance of, encouraging commercial growth in key outer London locations.</li> </ul>
<p><b>26. Hot food takeaways</b></p> <ul style="list-style-type: none"> <li>➤ No specific policy but reference to hot food takeaways is made in supporting text to policy for supporting a successful and diverse retail sector.</li> <li>➤ Policy refers to needing to manage clusters of uses having regard to their impacts; the supporting text states that</li> </ul>	<p><i>E9 Retail, markets and hot food takeaways</i></p> <ul style="list-style-type: none"> <li>• A5 hot food takeaway should not be permitted within 400 metres of an existing or proposed primary or secondary school.</li> <li>• Boroughs wishing to set locally determined distance from schools must ensure sufficiently justified.</li> <li>• Boroughs to consider whether appropriate to manage over-concentration of A5 hot food takeaway uses within</li> </ul>	<p>Support inclusion of specific policy resisting new hot food takeaways within 400m of a school, as well as resisting overconcentration.</p>

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<p>over concentrations of hot food takeaways give rise to concerns and that further guidance being given in Mayor’s Town Centres SPG.</p>	<p>town centres using locally-defined thresholds.</p>	
<p><b>27. Improving air quality</b></p> <ul style="list-style-type: none"> <li>➤ Boroughs should have policies that seek reductions in levels of pollutants referred to in Government’s National Air Quality Strategy and take account of air quality review assessments, particularly where Air Quality Management Areas have been designated.</li> <li>➤ Development proposals should: be at least ‘air quality neutral’; not lead to further deterioration of existing poor air quality; address local problems of air quality where a development used by large number of people; promote sustainable design and construction to reduce emissions from demolition and construction and ensure that where emissions reduction needed from development this is made on-site.</li> </ul>	<p><i>S11 Improving air quality</i></p> <ul style="list-style-type: none"> <li>• Provisions to improve London’s air quality and the application of the zero-carbon target to non-residential major developments.</li> <li>• Air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, including children and elderly people, should be reduced.</li> <li>• DLP allocates Air Quality Focus Areas, (replacing Air Quality Management Areas), where development should prevent or minimise increased exposure to existing air pollution</li> <li>• Air Quality Assessments required for all major development applications, unless transport and building emissions will be less than the previous or existing use.</li> </ul>	<p>Welcome the approach to improving air quality and applying the zero-carbon target to non-residential major developments.</p>
<p><b>28. Waste net self-sufficiency and capacity</b></p> <ul style="list-style-type: none"> <li>➤ Manage London’s waste within London with target of reaching 100% by 2026.</li> <li>➤ Target of zero biodegradable or recycled waste to landfill by 2026.</li> <li>➤ Achieved by minimising waste, encouraging reuse and reduction in use of materials, improving recycling/composting levels and</li> </ul>	<p><i>S17 Reducing waste and supporting the circular economy</i>  <i>S18 Waste capacity and net waste self sufficiency</i>  <i>S19 Safeguarding waste sites</i></p> <ul style="list-style-type: none"> <li>• Promotion of a circular economy that improves resource efficiency and innovation.</li> <li>• 100% of London’s waste should be managed within London by 2026</li> <li>• Existing waste management sites should be safeguarded.</li> </ul>	<ul style="list-style-type: none"> <li>• Support emphasis on circular economy and target of zero biodegradable or recyclable waste to landfill by 2026 – but difficult to monitor</li> <li>• London will struggle to be net self-sufficient in all waste streams if that includes excavation waste.</li> <li>• London lacks adequate landfill sites and so much of this waste is likely to continue</li> </ul>

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<p>working with authorities in WSE to coordinate strategic waste management across greater south-east England.</p> <ul style="list-style-type: none"> <li>➤ Boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage tonnages of waste apportioned in Plan.</li> </ul>	<p>Policy S18 states that London should be net self-sufficient in all waste streams</p>	<p>to be exported to landfills outside London.</p>
<p><b>29. Decentralised Energy Networks</b></p> <ul style="list-style-type: none"> <li>➤ 25% of heat and power used in London to be generated through use of localised decentralised energy systems by 2025.</li> <li>➤ Borough policies and proposals to identify and establish decentralised energy network opportunities.</li> </ul>	<p><i>GG6 Increasing efficiency and resilience</i> <i>S13 Energy infrastructure</i></p> <ul style="list-style-type: none"> <li>• Improve energy efficiency, support move to a low carbon circular economy with London becoming zero carbon city by 2050.</li> </ul>	<ul style="list-style-type: none"> <li>• Scope for Mayor to do more to encourage innovation and start-up investment.</li> <li>• Critical to technological advancement in supporting new ways of generating electricity at a local level.</li> <li>• Within Barnet decentralised energy networks delivered in regeneration and housing estate renewal areas.</li> </ul>
<p><b>30. Strategic Approach to Transport</b></p> <ul style="list-style-type: none"> <li>➤ Closer integration of transport and development encouraging patterns of development that reduces need to travel, especially by car.</li> <li>➤ Improve capacity and accessibility of public transport, walking and cycling.</li> <li>➤ Identify and support development that generates high levels of trips at locations with high levels of public transport accessibility and/or capacity.</li> <li>➤ Improve interchange between different forms of transport, particularly around major rail and underground stations.</li> <li>➤ Seeking to ensure all parts of public transport network can be used safely</li> </ul>	<p><i>T1 Strategic approach to Transport</i></p> <ul style="list-style-type: none"> <li>• 80% of all trips in London to be made by foot, cycle or public transport.</li> <li>• Journeys within central and inner London already meet or exceed the 80% target.</li> <li>• Existing levels for trips in Outer London are 64%, and for Barnet 58%.</li> </ul>	<ul style="list-style-type: none"> <li>• Aspiration to increase sustainable travel to a mode share of 80% presents significant challenges for outer London, where the car remains an important mode of transport.</li> <li>• Need to recognise importance to improve orbital links – particularly for public transport.</li> <li>• Key strategic routes would benefit from greater consideration recognising that origins and destinations of traffic on routes is not necessarily within Barnet.</li> <li>• Need for TfL and Highways England to take adequate responsibility for helping to meet car reduction targets on their networks, especially for freight.</li> </ul>

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<p>and easily by all.</p> <ul style="list-style-type: none"> <li>➤ Facilitate efficient distribution of freight whilst minimising impacts on the transport network.</li> <li>➤ Promoting greater use of low carbon technology.</li> <li>➤ Promoting walking and cycling by improving the extent and quality of routes and ensuring improved public realm.</li> <li>➤ Support need for limited improvements to London’s road network through improving or extending existing capacity or providing new links.</li> </ul>		
<p><b>31. Transport Capacity and schemes</b></p> <ul style="list-style-type: none"> <li>➤ Table of indicative list of transport schemes with anticipated completion dates includes ref to: <ul style="list-style-type: none"> <li>i) Crossrail 2 - post 2022;</li> <li>ii) Great Northern - train lengthening and further capacity increases, 2017-2022;</li> <li>iii) Northern line - upgrade to deliver further 20% increase in capacity, 2017-2022;</li> <li>iv) Piccadilly line - upgrade to provide additional capacity and improve journey times, post 2022, and new trains delivered by 2021/22;</li> <li>v) Continuing programme of refurbishment/modernisation of tube stations;</li> <li>vi) Regular review of bus network to cater for population, housing and employment growth;</li> </ul> </li> </ul>	<p><i>T3 Transport Capacity, connectivity and safeguarding</i>  <i>T4 Assessing and mitigating transport impacts.</i>  <i>T9 Funding transport infrastructure through planning</i></p> <ul style="list-style-type: none"> <li>• Policies seek to ensure provision of sufficient suitably located land for current and expanded public and active transport system.</li> <li>• Crossrail 2 see above Opportunity Areas</li> <li>• Intention to reallocate bus capacity from central to outer London.</li> <li>• Policy specifies circumstances whereby financial contributions should be sought to address adverse transport impacts and direct provision of public transport, walking and cycling facilities.</li> <li>• Recognition that there may be circumstances where additional public transport and active travel infrastructure may need to be provided which could include additional bus stops and on street improvements.</li> <li>• Recognition that bus services have an increasingly</li> </ul>	<ul style="list-style-type: none"> <li>• Inclusion of Crossrail 2 (2020-2040) and Thameslink (2017-2020) with high priority status is welcomed.</li> <li>• West London Orbital Line from Brent Cross (Dudding Hill line) should be accorded higher priority and included in the indicative list of transport schemes associated with policy T3</li> <li>• Specific support should be given to re-opening the line and the desirability of its delivery linking Brent Cross Cricklewood to the emerging growth area at Old Oak Common with firmer commitment to setting an opening date by mid to late 2020s for this critical infrastructure.</li> <li>• Support devolved suburban rail services to TfL to improve frequencies/ services.</li> <li>• London Underground Station Capacity</li> </ul>

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<p>vii) High quality bus priority / transit corridors supporting economic revitalisation in Opportunity Areas by providing new links and services;</p> <p>viii) Cycling – well signed network of radial and orbital routes, mainly on low-traffic back streets, mini-Hollands providing transformational change in chosen outer London town centres and cycle super highways on north-south and east-west routes, up to 2022; and</p> <p>ix) Road Projects – other than improvements at Brent Cross/ Cricklewood, no specific improvement schemes listed relating to Barnet. More generally, reference made to ongoing programme of maintenance, enhanced safety features, implementation of range of environmental measures to create greener streets, schemes and traffic signalling upgrades designed to achieve better management of road space and improved journey reliability.</p>	<p>important role to play in development of London, particularly delivering orbital connections.</p> <ul style="list-style-type: none"> <li>• Mayoral commitment to work with partners to continue development of a comprehensive network of frequent high quality bus routes.</li> </ul>	<p>Programme (2017-40) is strongly supported with regards upgrades in capacity the Northern and Piccadilly Lines as soon as can be practicably brought forward. More details required.</p> <ul style="list-style-type: none"> <li>• Welcome emphasis on improvements to orbital bus connections between town centres. Suburban bus services suffer from overcrowding at peak times and a lack of route choices in some locations hinders equal opportunities to access public facilities and services.</li> <li>• Through careful planning of bus services there is an opportunity to increase the connectivity of town centres with lower PTALs to enhance their capacity for growth and also to facilitate the densification of linked residential areas where appropriate.</li> <li>• Further detail required on proposals to reallocate bus capacity and specific strategies required to address challenge of orbital routes in outer London.</li> </ul>
<p><b>32. Streets and Walking</b></p> <ul style="list-style-type: none"> <li>➤ Local Plans to promote improvements to quality of bus, bus transit and tram services and networks.</li> <li>➤ Local Plans should maintain and promote relevant sections of the Walk London network, (in Barnet London Outer Orbital Path and Capital Ring); identify and implement accessible, safe</li> </ul>	<p><i>GG3 Creating a healthy city</i>  <i>GG5 Growing a good economy</i>  <i>T2 Healthy streets</i></p> <p>New policy reflecting the Healthy Streets Approach set out in Mayor’s Draft Transport Strategy.</p> <ul style="list-style-type: none"> <li>• Development proposals should deliver patterns of land use that facilitate shorter, regular trips by walking or cycling.</li> <li>• Design and management of street environments to make</li> </ul>	<ul style="list-style-type: none"> <li>• Need for careful consideration how the aims can be delivered in the Barnet context with major barriers to reducing severance from major highway corridors and reducing emissions originating outside the Borough.</li> <li>• Significantly increasing levels of walking, cycling and public transport use will require a multi-faceted approach to deal</li> </ul>

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<p>and convenient direct routes to town centres, transport nodes and other key uses; audit existing pedestrian infrastructure to ensure suitable for proposed use and encourage higher quality pedestrian and street environment.</p>	<p>cycling and walking more attractive, safer and more accessible.</p> <ul style="list-style-type: none"> <li>• Involves some radical rethinking on how people travel, especially in low density, low PTAL areas and those that have poor cycling and walking infrastructure.</li> </ul>	<p>with the diverse range of local circumstances in different parts of the Borough.</p>
<p><b>33. Cycling</b></p> <ul style="list-style-type: none"> <li>➤ Significant increase in cycling in London with at least 5% modal share by 2026.</li> <li>➤ Identify and implement network of cycle routes across London including Cycle Superhighways and Quietways.</li> <li>➤ Continue to operate and improve cycle hire scheme.</li> <li>➤ Fund transformation of up to 4 outer London town centres into cycle friendly ‘mini-Hollands’.</li> <li>➤ Local Plans should identify, promote and facilitate completion of relevant schemes.</li> <li>➤ Identify and implement safe and convenient direct cycle routes to town centres, transport nodes and other key uses such as schools.</li> <li>➤ Implement secure cycle parking facilities in line with minimum standards (as stipulated in a table included in the London Plan for each different use class) or implement own standards to provide higher levels of provision.</li> </ul>	<p><i>Policy T5 Cycling</i></p> <ul style="list-style-type: none"> <li>• Commitment to provide improved cycling infrastructure, parking standards and policy provision.</li> <li>• Development should facilitate and encourage cycling and reduce car dependency and the health problems it creates.</li> <li>• Mayor will deliver in partnership with boroughs a new London-wide network of strategic cycling routes with new routes and improved infrastructure.</li> <li>• The draft MTS proposes the expansion and improvement of cycle networks in London so that 70% of Londoners will live within 400 metres of a high-quality and safe cycle route by 2041.</li> <li>• Higher minimum cycle parking standards will not apply in Outer London with exception for certain sites that include Edgware.</li> </ul>	<ul style="list-style-type: none"> <li>• Barnet is working towards enabling a step change in the way the borough caters for cyclists.</li> <li>• Given Barnet’s range of urban, sub-urban and semi-rural settings, it is difficult to see how one approach would work in practice across the whole borough.</li> <li>• Important that new cycle routes do not reinforce the current radial bias of London’s transport system and covers far more of outer London introducing more orbital routes.</li> <li>• Request further clarification / reasoning to justify requiring locations such as Edgware to have higher minimum cycle parking standards.</li> </ul>

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<p><b>34. Residential Car Parking Standards</b></p> <ul style="list-style-type: none"> <li>➤ Appropriate balance sought between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.</li> <li>➤ Maximum standards set out in London Plan as basis for considering applications based on PTAL, density (units per hectare) and location (suburban, urban and central) ranging from up to 1 space in central areas with PTAL of 5 to 6 to up to 2 spaces in suburban locations with PTAL of 0 to 1.</li> <li>➤ Allowance for outer London areas to adopt more generous standards to address overspill parking pressures in areas with low public transport accessibility (generally PTALs 0-1).</li> </ul>	<p><i>Policy T6.1, Residential Car Parking Standards</i></p> <p>The draft standards are based predominantly on PTAL.</p> <ul style="list-style-type: none"> <li>• new development should not exceed maximum parking standards set out in Table 10.3 (Outer London ranges from up to 0.5 spaces per unit for PTAL 4 locations to up to 1.5 spaces per unit for PTAL 0-1 locations).</li> <li>• Outer London boroughs wanting to adopt minimum residential parking standards (within maximum standards range) must only do so for areas of London with PTAL 0-1.</li> </ul> <p>The following Table compares Barnet residential Parking standards (DM17) and the Draft London Plan Dec 2017 maximums.</p> <p><b>Table 1: LBB/LPD comparison</b></p> <table border="1" data-bbox="779 794 1487 1345"> <thead> <tr> <th>Bedrooms/ Household</th> <th>LONDON PLAN DRAFT DEC 2017 Maximums</th> <th>DM17 Maximum Parking Spaces per Unit</th> <th>PTAL</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1*</td> <td>0.75-1.5</td> <td rowspan="2">0 to 1</td> <td>1-3</td> </tr> <tr> <td>0.5-Car free</td> <td>4-5</td> </tr> <tr> <td rowspan="2">2</td> <td>0.75-1.5</td> <td rowspan="2">0 to 1.5</td> <td>1-3</td> </tr> <tr> <td>0.5-Car Free</td> <td>4-5</td> </tr> <tr> <td rowspan="2">3</td> <td>0.75-1.5</td> <td rowspan="2">0 to 1.5</td> <td>1-3</td> </tr> <tr> <td>0.5-Car free</td> <td>4-5</td> </tr> <tr> <td rowspan="2">4+</td> <td>0.75-1.5</td> <td rowspan="2">0 to 2</td> <td>1-3</td> </tr> <tr> <td>0.5-Car free</td> <td>4-5</td> </tr> </tbody> </table> <p><i>*where small units (generally studios and one bedroom flats)</i></p>	Bedrooms/ Household	LONDON PLAN DRAFT DEC 2017 Maximums	DM17 Maximum Parking Spaces per Unit	PTAL	1*	0.75-1.5	0 to 1	1-3	0.5-Car free	4-5	2	0.75-1.5	0 to 1.5	1-3	0.5-Car Free	4-5	3	0.75-1.5	0 to 1.5	1-3	0.5-Car free	4-5	4+	0.75-1.5	0 to 2	1-3	0.5-Car free	4-5	<ul style="list-style-type: none"> <li>• Continued car use in the lower density suburbs of outer London remains a reality, irrespective of public transport service and reliability improvements.</li> <li>• Barnet’s Local Plan includes a local approach to parking marginally less restrictive than the London Plan for residential development.</li> <li>• We recognise that there is some provision for flexibility within this framework to take account of local variations and the way these are applied across different tenures.</li> <li>• Given that areas of high PTAL value are more likely to be high density with smaller units, the proposed standards should provide the required flexibility, while allowing the Council the opportunity to set different standards based on demand and public transport accessibility that more accurately reflect social, environmental, strategic, and policy changes since 2011.</li> <li>• Although appearing to be reasonably well aligned with the current Barnet internal parking standards review, the proposed DLP standards will however require further careful consideration.</li> <li>• The implications of car free developments for all areas with a PTAL 5-6 will also need to be further considered.</li> <li>• Need to be more sensitive in terms of visitors parking particularly with regard to vulnerable residents living in new parking</li> </ul>
Bedrooms/ Household	LONDON PLAN DRAFT DEC 2017 Maximums	DM17 Maximum Parking Spaces per Unit	PTAL																											
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APPENDIX A – INITIAL RESPONSE ON DRAFT LONDON PLAN

2016 London Plan Designation / Policy	New Draft London Plan (DLP) Designation / Policy	Initial Barnet Response
	<i>make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit.</i>	restricted development
<p><b>35. Car Parking for non-residential development</b></p> <ul style="list-style-type: none"> <li>➤ Allowance for outer London boroughs to promote more generous standard for office B1 use employment developments where this can be justified.</li> </ul>	<p><i>Policy T6 Car parking</i>  <i>Policy T6.2 Office Parking</i>  <i>Policy T6.3 Retail Parking</i>  <i>Policy T6.4 Hotel and leisure uses parking</i>  <i>Policy T6.5 Non-residential disabled persons parking.</i>                      These policies stipulate that:</p> <ul style="list-style-type: none"> <li>• New housing and office developments that are in areas well connected by public transport expected to be car-free.</li> <li>• Outer London maximum parking standards are also set for offices and retail developments (numbers of spaces based on quantum of floorspace).</li> <li>• Definition of well-connected areas includes Major Town Centres (i.e. Edgware) and all areas with a PTAL score of 5 – 6. The level of parking required determined by the location of the development and its PTAL score.</li> </ul>	<p>Barnet currently accepts London Plan standards on non-residential developments. Further consideration is needed of the DLP policies and standards to determine whether it will be possible to continue to follow this approach.</p>
<p><b>36. Freight and Servicing</b></p> <ul style="list-style-type: none"> <li>➤ Local Plans should promote sustainable freight transport by safeguarding existing sites and identifying new sites to enable transfer of freight to rail and water; identify sites for consolidation centres and break of bulk facilities.</li> <li>➤ Locate developments generating high freight movements close to major transport routes.</li> </ul>	<p><i>Policy T7 Freight and Servicing</i>                      This policy seeks to facilitate sustainable freight movement in London through consolidation, modal shift and promoting deliveries at different times of day and night so as to reduce the impact on road congestion and air quality and conflict with other uses.</p>	<ul style="list-style-type: none"> <li>• Support aspirations in terms of freight and servicing.</li> <li>• Given continued growth of freight and home deliveries, in developing transport policies and priorities for outer London consideration of safety and residents privacy is needed and what might be achieved to ensure efficient and appropriate use of the road network alongside any behaviour and policy changes needing to be delivered.</li> </ul>