

MEETING

POLICY AND RESOURCES COMMITTEE

DATE AND TIME

WEDNESDAY 16TH JUNE, 2021

AT 7.00 PM

VENUE

HENDON TOWN HALL, THE BURROUGHS, LONDON NW4 4BQ

TO: MEMBERS OF POLICY AND RESOURCES COMMITTEE (Quorum 3)

Chairman: Councillor Daniel Thomas BA (Hons)

Vice Chairman: Councillor David Longstaff

Councillors

Councillor Dean Cohen

Councillor Ross Houston

Councillor Sachin Rajput

Councillor Gabriel Rozenberg

Councillor Geof Cooke

Councillor Arjun Mittra

Councillor Barry Rawlings

Councillor Peter Zinkin

Councillor Val Duschinsky

Councillor Alison Moore

Councillor Caroline Stock

Substitute Members

Councillor Jess Brayne

Councillor Paul Edwards

Councillor Rohit Grover

Councillor Melvin Cohen

Councillor Alan Schneiderman

Councillor Kath McGuirk

Councillor Mark Shooter

In line with the Constitution's Public Participation and Engagement Rules, requests to submit public questions must be submitted by 10AM on the third working day before the date of the committee meeting. Therefore, the deadline for this meeting is Friday 11 June at 10AM. Requests must be submitted to Maria Lugangira at maria.lugangira@barnet.gov.uk

You are requested to attend the above meeting for which an agenda is attached.

Andrew Charlwood – Head of Governance

Governance Service contact: Maria Lugangira 020 8359 2761

Media Relations Contact: Tristan Garrick 020 8359 2454

ASSURANCE GROUP

ORDER OF BUSINESS

Item No	Title of Report	Pages
1.	Minutes of last meeting	5 - 10
2.	Absence of Members	
3.	Declaration of Members' Disclosable Pecuniary interests and Non Pecuniary interests (If any)	
4.	Report of the Monitoring Officer (if any)	
5.	Public Questions and Written Comments (if any)	
6.	Members' Items (if any)	
7.	Business Planning 2022-26	11 - 78
8.	Barnet's Local Plan – Publication - Regulation 19 Town and Country Planning (Local Planning) (England) Regulations (Reg 19)	79 - 714
9.	West Hendon Playing Fields - Outline Business Case	715 - 876
10.	Edgware Growth Area Supplementary Planning Document	877 - 1024
11.	Equalities, Diversity, and Inclusion Policy 2021-25	To Follow
12.	Committee Forward Work Programme	1025 - 1028
13.	Any item(s) the Chairman decides are urgent	

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Decisions of the Policy and Resources Committee

24 May 2021

Members Present:-

AGENDA ITEM 1

Councillor Daniel Thomas (Chairman)
Councillor David Longstaff (Vice-Chairman)

Councillor Dean Cohen	Councillor Sachin Rajput
Councillor Geof Cooke	Councillor Barry Rawlings
Councillor Val Duschinsky	Councillor Gabriel Rozenberg
Councillor Ross Houston	Councillor Peter Zinkin
Councillor Arjun Mittra	Councillor Mark Shooter (In place of
Councillor Alison Moore	Councillor Anthony Finn)

1. MINUTES OF LAST MEETING

RESOLVED that the minutes of the meeting dated the 8 February 2021 be agreed as a correct record.

2. ABSENCE OF MEMBERS

Apologies for absence were received from Councillor Anthony Finn. Councillor Mark Shooter was substituting.

The Chairman informed the Committee that Councillor Finn would be retiring from the Policy and Resources Committee as of 25th May 2021, Annual Council meeting. He thanked Councillor Finn for his work and contribution to the Committee.

3. DECLARATIONS OF MEMBERS PECUNIARY INTERESTS AND OTHER INTERESTS (IF ANY)

Councillor Arjun Mittra declared an interest in agenda Items 7 and 8 - by virtue of (i) there being a representation from the former Assembly Member Andrew Dismore, who Councillor Mittra used to work for and (ii) Councillor Mittra is an employee of the GLA.

Councillor Geof Cooke declared an interest in agenda Item 7 by virtue of the National Grid being referenced and he has shares arising from an employee save share scheme.

Councillor Ross Houston declared an interest in agenda Item 7 by virtue of having a £1 share in Notting Hill Genesis and being a Council appointed Non-Executive Director of The Barnet Group.

Councillor Peter Zinkin declared a pecuniary interest in agenda Item 7 by virtue of being a Director of London Energy. Councillor Zinkin had been granted a dispensation by the Monitoring Officer

Councillor Dean Cohen declared an interest in agenda Items 7 by virtue being a Council appointed member on the North London Waste Authority.

4. REPORT OF THE MONITORING OFFICER (IF ANY)

None.

5. PUBLIC QUESTIONS AND WRITTEN COMMENTS (IF ANY)

None.

6. MEMBERS' ITEMS (IF ANY)

At the invitation of the Chairman, Councillor Ross Houston introduced the Member's Item.

Members Item Request:	Instruction from Committee
<p>A gambling licence for a Merkur Slots casino at 48 Ballards Lane, Finchley Central was agreed at a Licensing Hearing, despite resident and local councillor objections. Barnet Council later rejected a planning application for change of use for this premises, but the application was approved on appeal by the Planning Inspector.</p> <p>This means there will be a slot casino in both Finchley Central and North Finchley to add to the 5 other betting shops in the area.</p> <p>I know this is not the only ward or town centre facing the problem of the proliferation of gambling premises.</p> <p>I ask that the Committee considers this issue and agrees that a review is done of the number and location of gambling outlets in areas across Barnet with a view to using planning powers like Article 4 directions, cumulative impact policy licensing powers and any other relevant powers to ensure there is not an overconcentration in any one area.</p> <p>Barnet's Labour councillors have proposed use of Article 4 directions and Cumulative Impact Zones to tackle this issue for some years, and I think it is time that we seriously consider use of the powers we have for the wellbeing of our communities.</p> <p>The Council needs to have the most robust policy framework to allow us to resist these types of applications.</p> <p>We should also consider the public</p>	<p>The Committee requests</p> <ol style="list-style-type: none"> 1. That officers carry out a review on the number of gambling and betting offices across the Borough and document where there is a particular proliferation of such premises. 2. That the above is conducted factoring in the Local Plan and its policies.

health dimension of problem gambling, demographic issues, the cost of problem gambling to our public services, and the impact on our communities, including young people and vulnerable people.	
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The Chairman informed the Committee that as part of the Local Plan there a policy specifically relating to places of gambling, betting offices, etc. The policy addresses monitoring and keeping a register of such places.

RESOLVED that the instructions as set out in the table above are noted.

7. BARNET COMMUNITY INFRASTRUCTURE LEVY CHARGING SCHEDULE REVIEW - SUBMISSION FOR EXAMINATION

The Chairman introduced the report which sought the Committee’s agreement to submit the Draft Community Infrastructure Levy (CIL) Charging Schedule for examination, following consultation. The Draft Charging Schedule proposed to revise the Barnet CIL rate to £300 per square metre for residential development and introduce a charge for employment and leisure uses of £20 per square metre.

The Independent viability evidence commissioned, indicated the new proposed rates to be (i) viable and (ii) would not unduly prejudice development coming forward in the borough.

Further set out in the report was an explanation on the representations received and how they were taken into account.

With regards to the EIA and the data presented on Page 120, Table 3: Religion 2011, it was requested that this data and all the data in the other tables is reviewed to ensure it is accurately presented prior to the final submission.

Following consideration of the report a separate vote was taken on the recommendations

Upon being put to the vote the recommendations 1, 2,4 as set out in the report were declared carried. The vote was recorded as follows;

For	13
Against	0
Abstentions	0

Upon being put to the vote recommendation 3 as set out in the report was declared carried. The vote was recorded as follows;

For	8
Against	0
Abstentions	5

RESOLVED – That the Committee

- 1. That the Committee considers the consultation responses received in relation to the Draft Charging Schedule, summarised in a table at Appendix B.**
 - 2. That having considered the consultation responses, officers and viability consultants proposed responses, the Committee agrees that the rates set out in the Draft Charging Schedule should not be amended apart from clarification points in relation to B2 and B8 uses and the use classes order.**
 - 3. That the Committee agrees submission of the draft Charging Schedule (Appendix A) and other evidence documents, including updates to the Council’s draft Infrastructure Delivery Plan (Appendix C), to the Planning Inspectorate for examination.**
 - 4. That the Committee note that the Charging Schedule, post examination (if recommended for approval by the examiner), will need to be approved by the full Council in line with s.213(2) Planning Act 2008 and Government Guidance on approving and implementing the Charging Schedule.**
- 8. REVIEW OF COMMUNITY INFRASTRUCTURE LEVY (CIL) ALLOCATION, ELIGIBILITY CRITERIA AND GUIDANCE**

The Chairman provided a brief introduction to the report which sought the Committee’s agreement, in respect of the Area Committee budgets, the allocations of Community Infrastructure Levy (CIL), the CIL Funding Policy and Eligibility Guidelines to enable funding applications to be assessed and determined by Members, and to provide CIL funding for a Road Safety & Parking fund to be managed by the Executive Director for Environment.

The Committee’s attention was drawn to the additional amendments to Appendix B that had been circulated.

With regards to the issue on revenue impact and consideration around CIL projects the Assistant Director - Capital Delivery, encouraged the need for Members to have informal discussions with officers around the development of schemes before they come to Committee. This would help identify whether there’d be any revenue impact.

With regards to the following paragraph in the additional amendment, Appendix B, Road Safety and Parking Request

“Should the Executive Director, Environment be minded to decline a request for Road Safety & Parking funding, this will be in consultation with the Chairman of the Environment Committee (for individual member requests) or the relevant Chairman of Chipping Barnet, Finchley and Golders Green or Hendon Area Committees (for requests made by committee member items)”

Councillor Alison Moore requested an amendment to the above, asking that when the decision to decline a request is made, along with those to be consulted an opposition member or one of the following is also consulted to aide transparency and openness;

- The lead opposition Member on Environment Committee
- Lead opposition Member on the Area Committee or
- Leader of the opposition

The Chairman confirmed that there would be transparency and openness by way of providing an explanation and the reason for declining the request to the Area Committee and to the Ward Councillor concerned. He reiterated the point raised by Assistant Director - Capital Delivery on working with officers and having those informal discussion as it may be the case that an alternative solution can be presented.

With the assurance that (i) a full report will be presented to Committee, clearly documenting and setting out the reasons on why the request has been declined and therefore enabling members to question the decision and (ii) there being a review in October, Councillor Moore withdrew the amendment.

Upon being put to the vote the tabled amendment to Appendix B and the additional amendment to Appendix B were unanimously agreed.

Upon being put to the vote the recommendations as set out in the report were unanimously agreed.

RESOLVED – That the Committee

- 1. Agree arrangements in respect of Area Committees allocations of Community Infrastructure Levy (CIL) funding of up to £1.2m per annum (£400,000 per Area Committee).**
- 2. Agree to remove the funding limit for each individual Area Committee CIL funded project.**
- 3. Agree in respect of the Area Committees the new CIL Funding Application Guidelines and Funding Application Form (Appendix A).**
- 4. Agree CIL funding for a Road Safety & Parking Fund of up to £300,000 per annum, for schemes to be authorised by the Executive Director, Environment.**
- 5. Agree the Road Safety & Parking Funding Guidelines and Request Form (Appendix B).**
- 6. Note that a review of the revised Area Committee CIL funding and Road Safety & Parking CIL Fund will be undertaken after two rounds of Area Committee meetings (i.e. in October/November 2021).**

9. COMMITTEE FORWARD WORK PROGRAMME

Councillor Rawlings requested if the 2 items currently listed as ‘items to be allocated’ can be update allocated to a meeting.

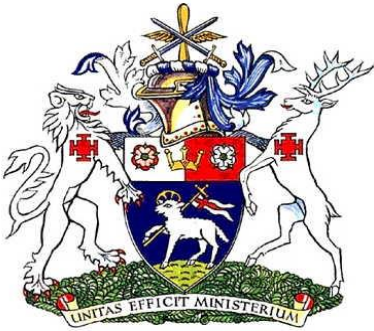
With regards to the Customer Strategy Update – Improving Customer Services, the Chairman confirmed the update report would be considered by the Policy and Resources Committee.

RESOLVED – subject to the above the Committee note the forward work programme.

10. ANY ITEM(S) THE CHAIRMAN DECIDES ARE URGENT

None.

The meeting finished at 8.03 pm



Policy and Resources Committee

16 June 2021

Title	Business Planning 2022-26
Report of	Chairman of the Policy and Resources Committee
Wards	All
Status	Public
Urgent	Yes
Key	Yes
Enclosures	Appendix A - Routine Financial Matters Appendix B - Capital Programme Appendix C - Housing Revenue Account Business Plan Appendix D - 2020/21 Quarter 4 Risk Register
Officer Contact Details	Anisa Darr – Director of Resources (S151 Officer) Anisa.Darr@barnet.gov.uk Ben Jay – Assistant Director of Finance (Deputy S151 Officer) Ben.Jay@Barnet.gov.uk

Summary

This report sets out the current challenges, proposed process, and timetable for the preparation of the budget for 2022/23 and the refresh of the Medium-Term Financial Strategy (MTFS) for 2022-26.

It also presents for approval a number of routine financial management matters, in line with financial regulations, including updates to the programme of capital investment, the update of the Housing Revenue Account business plan, budget amendments and debt management.

Officers Recommendations

That the Committee:

In respect of business planning for 2022-26:

- 1. Notes the revised Medium-Term Financial Strategy;**
- 2. Notes the 2020/21 revenue and capital outturn General Fund and Housing Revenue Account positions;**
- 3. Notes the delivery timetable for the 2022/23 budget setting process;**
- 4. Considers the proposed 'cash limit' approach to budget planning for 2022/23, also proposals to include greater use of data to inform budget planning, alignment to delivery of Barnet Plan, and planning for post pandemic activity levels;**
- 5. Notes the proposed approach to the financial strategy;**

In respect of routine financial matters for 2021/22:

- 6. Approves the revenue budget virements for 2021/22 presented**
- 7. Approves the writes-offs for Sundry Debt, Housing Revenue Account tenant arrears and General Fund tenant arrears;**
- 8. Approves the revised Capital Programme and financing of it;**
- 9. Approves the release of financing to TfL (set out in para 5.45 – proposed use of s106 funding to support a bus route extension);**
- 10. Notes the HRA Business Plan and refreshed 2021/22 budget (para 5.46 ff);**
- 11. Notes the Quarter 4 2020/21 Corporate Risk Register (para 5.56 ff).**

1. SUMMARY

- 1.1** As in previous years, this will be the first of several reports to Policy & Resources Committee on 2022/23 budget setting and the 2022-26 MTFS update. The next update to Committee will be in September 2021 with a set of initial budget proposals ahead of November Theme Committees.
- 1.2** While the main subject for this report is business planning for 2022/23 and the MTFS period to 2025/26, this report also presents some routine items for P&R committee approval in

line with financial regulations. These are set out at the end of the report and the appendices.

- 1.3 The MTFS approved at March 2021 Full Council set out a savings requirement of £48.911m between 2021/22 and 2024/25. The budget for 2021/22 is balanced, and the remaining savings to be found for 2022/23 to 2024/25 is £14.109m of which £8.579 is in 2022/23

Table 1: 2021-2025 MTFS Summary as at March 2021

2021-25 MTFS	2021/22	2022/23	2023/24	2024/25
Resources vs. Expenditure	£'000	£'000	£'000	£'000
Expenditure	343,293	351,892	370,952	391,432
Resources	(332,703)	(324,826)	(333,296)	(342,521)
Cumulative Savings Requirement	10,590	27,067	37,656	48,911
Savings Approved by Full Council (March 2021)	(10,590)	(18,488)	(27,334)	(34,802)
Cumulative Savings Gap	0	8,579	10,322	14,109

- 1.4 The pandemic has had a significant impact on the delivery of and cost of services. This has a knock on impact on the Medium-Term Financial Strategy. The MTFS set out in March 2021, which covered 2021-25, was prepared while the pandemic response was ongoing and the outlook remained uncertain. Many service delivery assumptions were rooted in the pre-pandemic period. At that point, the MTFS indicated a remaining savings requirement for 2022/23 of £8.6m, rising to £14.1m by 2024/25.
- 1.5 The outturn for the year just ended reported a £9.7m underspend to planned non-C19 spending, with £6.6m being added to service specific reserves against planned or prudent objectives. Overall, funding received was significantly different in many areas than what had been budgeted or forecasted, due to the impact of the pandemic, which points to budgets no longer being fully aligned with spending plans. However, it is not yet clear what the post-pandemic 'normal' for council operations will be – put another way, we do not yet know how much of the previous spending plans will hold good, and how many will need to be revised as new trends become clearer. A key priority for the council in the new financial year (2021/22) and through the budget planning process for 2022/23 and beyond will be to understand the post-pandemic operation of council services and the MFTS impact of that. This will allow a comprehensive review of budgets.
- 1.6 This comprehensive budget review should seek to address all areas, but, in practice, will need to prioritise key areas of spending or income, including such areas as social care placements (Adults c£70m and Children's c£30m) including relevant mental health and domestic violence support; also income streams such as those from business rates (c£60m) and car parking (c£20m). Additionally, the economic impact on businesses and local employment, together with changing resident expectations of services such as housing provision, leisure, and parks and open spaces will also require review.
- 1.7 To provide more time to undertake such broad review, it is intended to start the budget planning process earlier than normal. A process running to early September 2021 will track trends in data and activity to develop revised budget proposals. This will be followed by the usual, budget setting process from September 2021 to March 2022.
- 1.8 In line with this review of budgets, it is proposed to take a revised approach to the 2022/23 budget setting process. Rather than focusing on adding pressures and savings to a base budget, as in previous years, this changed approach will analyse demand changes

anticipated (in the post-pandemic world) and identify offsetting efficiencies to balance them from within the directorate. As such a nominal “cash limit” will be set for each directorate to work within based on the current year budget. Once directorate demand estimates, investment plans, and efficiency proposals have been prepared, there will be a review of all plans across the council to ensure consistency with the priorities in the Barnet Plan. This approach is intended to maximise the opportunity to scrutinise all budgets across each directorate and also reflects the uncertainty of funding from Government.

Table 2 - Current MTFS resource estimates

	<u>2021/22</u>	<u>2022/23</u>	<u>2023/24</u>	<u>2024/25</u>	<u>2025/26</u>
<u>Forecast Resources (Calculated year by year)</u>	<u>£m</u>	<u>£m</u>	<u>£m</u>	<u>£m</u>	<u>£m</u>
Council Tax Income	(198.051)	(202.005)	(207.060)	(213.292)	(218.740)
Settlement Funding Assessment (incl. NDR, RSG, top up)	(64.749)	(64.749)	(64.749)	(64.749)	(64.749)
Other Grants (recurrent)	(54.305)	(52.051)	(47.051)	(42.051)	(39.051)
Total Recurrent Resources	(317.105)	(318.805)	(318.860)	(320.092)	(322.540)
Other Grants (non- recurrent)	(15.996)	0.000	0.000	0.000	0.000
Total All Resources	(333.101)	(318.805)	(318.860)	(320.092)	(322.540)

1.9 The future funding position for Local Government remains uncertain. The table above makes indicative estimates of what funding could look like over the MTFS period. The three main assumptions are:

- The flexibility to raise council tax by 1.99% will remain and will be used;
- New Homes Bonus (NHB) will continue to reduce;
- All other Government grants (including business rates top up grant) will remain the same.

1.10 The finance settlements for 2020/21 and 2021/22 have been announced as single year settlements with no estimates for future years. The current expectation is that by the end of Autumn 2021, a multi-year Spending Review will be announced which could give some indication of future funding for local authorities. So, alongside a comprehensive review of internal budgets, there may also be significant changes to external resources to consider as well.

2. NATIONAL AND LOCAL CONTEXT

2.1 HM Treasury announced the Budget Statement for 2021/22 on 03 March 2021. The March 2021 Budget announced an additional £65bn of spending to the economy to bring the total Covid-19 support package in 2020/21 and 2021/22 to £407bn.

2.2 Whilst there were no specific announcements on Local Government funding, there were a range of new measures set out to continue support to individuals and businesses. However, it should be noted that current plans set out by the Treasury indicate public spending is to reduce by £18bn in the near-term; given that MHCLG spending (which funds local government grants) is ‘unprotected’, this may equate to a 5%+ spending reduction to be faced in the near future.

Corporate Plan

- 2.3 The Barnet Plan is summarised below. It was approved by Full Council in March 2021 and is centred on the four priorities and two overarching approaches (Prevention and Equalities) set out below. A key objective of the review of future budgets will be to ensure that they support delivery of the Barnet Plan objectives.

Table 3: Summary of the Barnet Plan Priorities

Priority	Component
Clean, safe and well run	Improving Customer Service
Clean, safe and well run	Better environmental services and a cleaner borough
Clean, safe and well run	Address issues of anti-social behaviour such as frauds, fly-tipping, noise nuisance and illegal parking
Clean, safe and well run	Robust Financial Management
Clean, safe and well run	Unlocking the potential of Parks and Open Spaces
Family Friendly	Family and Belonging- Families and children can be together and be part of a community that encourages resilience
Family Friendly	Safe and Secure - Children and young people are safe and protected from harm
Family Friendly	Education and Learning- Children and young people can learn about the world around them
Family Friendly	Health and Wellbeing - Children are supported to achieve a healthy start in life, enjoy a healthy lifestyle and to build resilience
Family Friendly	Life Chances - Children and young people are able to succeed
Healthy	Bringing health care together and be part of a community that encourages resilience
Healthy	Strengths and independence
Healthy	Being physically active
Healthy	Mental health and wellbeing
Healthy	Tackling domestic abuse and gender-based violence
Healthy	Addressing the longer-term impacts of COVID-19
Thriving	Helping residents - especially young people - into work
Thriving	Implement our Growth Strategy
Thriving	Building a park town for Barnet at Brent Cross Town
Thriving	Create an efficient, convenient and reliable transport network
Thriving	Make Barnet a sustainable borough

- 2.4 The priorities will be delivered with a Prevention based approach to adopt measures to help people remain healthy, happy and independent in all aspects of life. Additionally, Equalities will be central to delivering the priorities to build a strong cohesive community, where diversity is celebrated, and everyone has equal opportunity regardless of their background place with fantastic facilities for all ages, enabling people to live happy & healthy lives.
- 2.5 Tables 3a and 3b set out plans for resourcing the C19 recovery and Barnet plan delivery, also for impact assessment on new or expanded initiatives.

Table 4a: Allocation of Covid 19 funding for recovery and delivery of Barnet Plan:

	£'000 one off
CSWR – improvements in CCTV, enforcement and improved Customer Service	210
Family Friendly – supporting education recovery, children’s emotional and mental health and employment	3,875
Healthy – improvements in integrated care	200
Thriving – supporting employment and sustainability	650
Prevention – improvements in insight	120
TOTAL	5,055

Table 5b: One off allocation of contingency to assess impact (one-off only, to be reviewed through 2022/23 budget process)

	£'000 one off
CSWR – improvements in customer services, parks, and cleansing	715
Family Friendly – support to tackle violence against women & girls	505
Healthy – support victims of domestic abuse	205
Thriving – support employment	100
Prevention – support to Voluntary, Community, and Faith Sector	440
TOTAL	1,810

2020/21 Outturn

- 2.6 A detailed analysis of the 2020/21 outturn was presented to the Financial Performance and Contracts Committee on 08 June 2021. (The report can be accessed here: [FPCC 8 June 2021 item 7.](#)) Policy and Resources Committee is asked to note the high-level position. The General Fund final revenue position for 2020/21 was a net underspend of £9.749m as set out in table 4. Services made net contributions to specific, non-C19 reserves to the value of £6.640m. C19 funding was received from the government in the value of £76.230m (excluding business rates support funding), and was supplemented by £8.772m brought forward from the previous year. Spending on pandemic response activity was £76.559m, and £8.443m has been carried into the new year to fund ongoing activity.

Table 6: 2020/21 revenue outturn

Service Areas	2020/21 Budget	Total Spend 2020/21	Budget variance	COVID Impact	Reserves - Service Specific, non-COVID	Month 12 Outturn	Non-COVID variance
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Adults and Health	102,538	127,450	24,911	29,285	604	97,561	(4,977)
Children's Family Services	70,024	77,693	7,670	7,410	(418)	70,701	677
Environment	10,189	24,046	13,857	14,273	363	9,410	(779)
Growth and Corporate services	44,065	50,858	6,793	6,453	1,662	42,743	(1,322)
Assurance	7,239	6,926	(313)	1,015	1,109	4,802	(2,437)
Resources	57,540	73,776	16,237	14,553	2,606	56,617	(922)
Public Health	17,940	22,234	4,294	3,569	713	17,952	12
Total at Month 12	309,535	382,985	73,450	76,559	6,640	299,786	(9,749)
2019/20 C19 grant unapplied				(8,772)			
Funding received for C19 in-year				(76,230)			
C19 funding available in 2020/21				(85,002)			
Transfer to 2021/22 via earmarked C19 reserves (grant unapplied)				8,443			
Transfer to earmarked (non-C19) reserves						9,749	9,749
Total at Month 12	309,535	382,985	73,450	76,559	6,640	309,535	0

2.7 The total capital outturn for 2020/21 capital investment programme is £327.144m of which £269.991m relates to the General Fund programme and £57.153m relates to the HRA capital programme. (Changes to the capital programme for 2021/22 onwards are discussed elsewhere in this report.)

Table 5: 2020/21 capital outturn

Service Area	2020/21 Budget	Additions/ (Deletions)	(Slippage)/ Accelerated Spend	2020/21 Outturn
	£000	£000	£000	£000
Adults and Health	6,109	0	(1,292)	4,817
Children's Family Services	14,347	0	(1,253)	13,094
Growth and Corporate services	119,413	(179)	(5,655)	113,579
Environment	36,057	0	(10,117)	25,940

Service Area	2020/21 Budget £000	Additions/ (Deletions) £000	(Slippage)/ Accelerated Spend £000	2020/21 Outturn £000
Brent Cross	140,861	0	(29,619)	111,242
Resources	1,419	465	(567)	1,318
General Fund Programme Total	318,206	286	(48,502)	269,991
HRA	62,044	0	(4,891)	57,153
Grand Total	380,250	286	(53,393)	327,144

3. APPROACH TO THE 2022-26 MTFS

Timetable

3.1 April to September 2021:

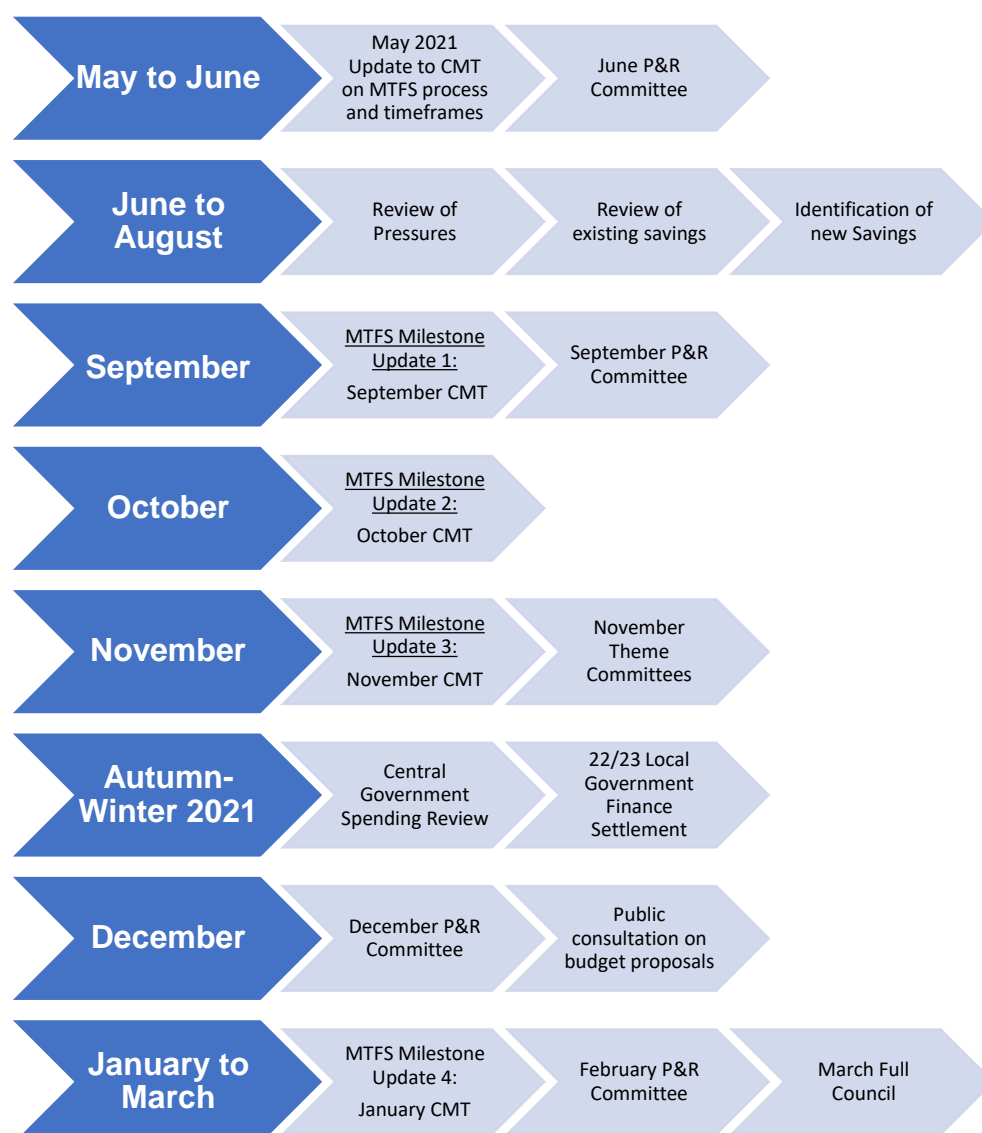
- Assumptions underpinning the current MTFS and specifically options for 2022/23 will be reviewed (comprehensive budget review);
- Ensure that the MTFS supports the Barnet Plan;
- Ensure the MTFS also supports the ongoing response to the Covid-19 pandemic and the move to recovery as this occurs in different services;
- Use emerging data from all service areas (especially demand or activity led services such as including business rates and parking income, and social care activity) to help estimate likely future patterns.

3.2 September 2021 to March 2022 will see the usual budget process including engagement with committees, service users, and residents. This is summarised in figure 1, below.

Budget uncertainty and post-pandemic budget review

3.3 The budget approach taken through the last planning round focussed on securing a balanced budget for 2021/22, which was achieved. However, many of the values included in the current MTFS are based on pre-pandemic data. These will need to be reviewed.

Figure 1 - overview of budget planning timetable



- 3.4 The effects of the Covid-19 pandemic are likely to continue into next financial year and beyond. Some services were directly and rapidly impacted (such as parking and leisure income flows) while other services have seen a delayed impact (for example, an increased preference for homecare over residential care). Some longer-term impacts (such as ongoing changes to the pattern of social care demand) may persist through the medium term.
- 3.5 Some additional services and new responsibilities have also transferred to local authorities (e.g. enforcement of regulations, test and trace services and running of testing and vaccination facilities) and further new responsibilities may be anticipated.
- 3.6 This means that the council’s approach to financial planning will need to be able to respond as new information and insights regarding the impact of the pandemic become available and as local communities accommodate to a post-pandemic life. All budgets will need to be reviewed to ensure that they continue to reflect service priorities and financial plans in

the post-pandemic period. To ensure resources and effort are targeted effectively, priority will be given to the larger and more uncertain budget areas.

Funding uncertainty

- 3.7 The current funding position remains uncertain beyond March 2022. The impact of the pandemic meant that key Government decisions on the multi-year Spending Review were deferred and replaced with a one-year Spending Round (SR20). This meant that other decisions such as the planned review of relative 'needs and resources', including changes to business rates, were also further deferred. The current position set out in the MTFS (attached) is that funding is assumed to remain unchanged unless there is evidence to the contrary. Estimates of future resources will be amended through the year as new information becomes available.

Data Led Approach

- 3.8 Usually, the MTFS is able to place great reliance on the financial results of the previous financial year and current year monitoring. These provide a 'foundation' of the latest available cost data on which new budgets can be built, since the majority of council services remain similar from year to year. However, the impact of the pandemic means that this is no longer as reliable: previous data may be accurate but may not reflect emerging trends, and there has been wide-ranging and significant changes to the needs of local people and businesses, as well as corresponding changes in the way council services are delivered.
- 3.9 A data led approach that identifies post-pandemic budget requirements will both support a value for money approach to decisions and promote robust financial management, in line with Barnet Plan objectives.

Current MTFS

- 3.10 An updated MTFS will be presented in September 2021.
Budget Process and Options
- 3.11 Historically, budgets have been set using prior year evidence such as outturn and other sources e.g. benchmarking data. There will be some service areas where costs are already committed that drive the overall budget e.g. social care packages. The usual budget setting process will estimate changes in overall funding and then ask services to balance estimated net costs back to available funding by:
- a. identifying additional pressures;
 - b. identifying new savings or income generation proposals;
 - c. proposing these to Theme Committees;
 - d. Seeking approval for the overall proposals from Council;
- 3.12 For 2022/23, an alternative approach is proposed to set the budget by considering demand and efficiencies within a nominal 'cash-limit'. This will reflect the budgetary expectation that resources are not expected to materially change between this year and next, while also

supporting the need for a review of all budgets as services stabilise and a post pandemic 'normal' begins to emerge.

Table 6a: Indicative budget allocations (nominal 'cash limits')

2020/21 Outturn and Indicative Cash Limits	2020/21 Budget	Outturn 20/21 (excl C19 costs and funding)	Budget 21/22	Indicative Budget 22/23
	£'000	£'000	£'000	£'000
Adults & Health	102,538	97,561	102,579	102,579
Children's Family Services	70,024	70,701	71,248	71,248
Environment	10,189	9,410	11,371	11,371
Growth & Corporate Services	44,065	42,743	41,863	41,863
Assurance	7,239	4,802	8,091	8,091
Resources (less Corporate)	57,540	56,617	58,872	58,872
Public Health	17,940	17,952	18,161	18,161
Covid-19 tranche 5 non ring-fenced grant			10,225	0
Total	309,535	299,786	322,410	312,185

3.13 It is recommended that the committee endorses an approach based around cash limits. Details are being finalised, but will include the following:

- a. Services, supported by the finance business partners (FBPs), will quantify likely demand pressures across all budget areas and document these.
- b. Services, again supported by FBPs, will then review existing budgets to propose efficiency savings (this may be as a result of the pandemic) to be delivered which will offset those demand pressures.
- c. Demand estimates and efficiency proposals across all service areas will be reviewed to ensure overall proposed investments and efficiencies align to the delivery of the Barnet Plan.
- d. The resulting proposals will be presented to Theme Committees for approval, and then to P&R and full council.
- e. Care will be taken to ensure that 'new burdens' are appropriately funded, and that possible increases in demand beyond budgeted levels can be accommodated within wider resources – such as earmarked service provisions or corporate contingency budgets. This will include matters that are required due to equality impact assessments.

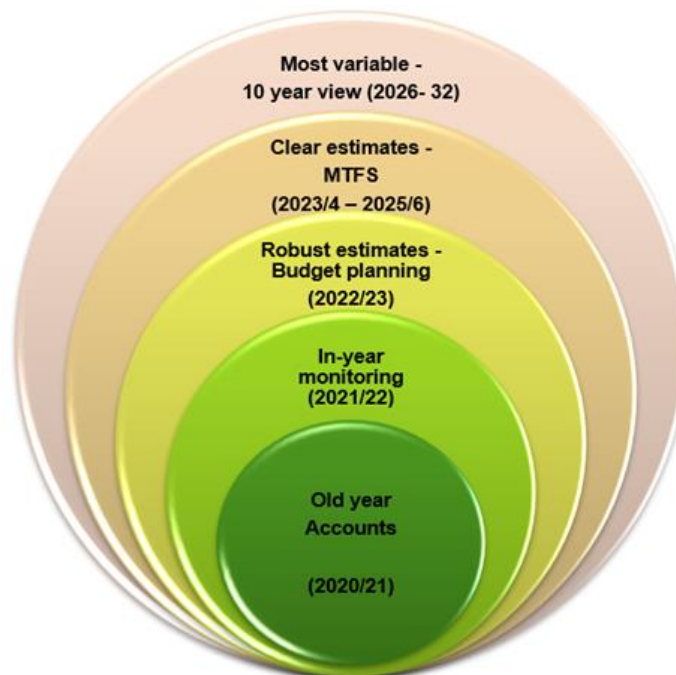
3.14 This approach is intended to ensure that the council reviews all existing budgets post-pandemic and in line with Barnet Plan objectives, in a way which minimises bureaucracy but still meets statutory requirements. It will allow a necessary focus on reviewing resource needs to delivery service priorities, but also ensure overall corporate consistency of approach and alignment to Barnet Plan objectives.

3.15 Indicative cash limited budgets for 2022/23 are set out in the table above. It must be noted that these values are subject to change as the year progresses; but the purpose of setting them out now is to ensure that services have sufficient certainty to enable the work of reviewing likely demand pressures and potential efficiency measures to begin.

4. FINANCIAL STRATEGY

- 4.1 The current planning environment is marked by ongoing uncertainty, and the council will need to plan to accommodate this. Current arrangements build on a foundation of the latest monitoring information as the best evidence of current spending needs. The current year provides evidence of emerging trends and will include new decisions impacting on future budgets. The detailed planning for the coming year accommodates both pieces of evidence, which can then be extrapolated to provide an outline of expected service expenditure across the medium term (usually the coming year and the following three years). It is proposed to add a further strand to this financial strategy which will provide a 10-year outlook for possible resources and overall spending (without the MTFS analysis of spending into service department areas). This is set out below.
- 4.2 Additionally, the Financial Management Code recently launched by CIPFA asks local authorities to adopt a longer-term view, which this revised approach to financial strategy will achieve.

Figure 2: budget strategy; accommodating uncertainty



- 4.3 The financial strategy is therefore proposed to include:
- 2020/21 Prior year financial accounts: the most recent, complete record of actual spending across all services, supported by an external auditor opinion.
 - 2021/22 In-year financial management and monitoring: To confirm expected trends and identify where new trends are emerging.
 - 2022/23 Robust Estimates: Detailed estimates of know cost drivers and funding changes for the coming year.

- Medium-Term Planning (Years 2-4): Indicative planning estimates for all budget values based on most likely scenarios.
- Long-term scenario and policy planning (10-year view): Horizon scanning to identify fundamental budget issues. This will help identify the likely resource levels in the longer term, together with expected fixed costs (such as capital financing, levies etc), and so help identify the trend in overall resources available to fund net service costs.

5. ROUTINE FINANCIAL MATTERS

2021/22 Budget Management

- 5.1 Following the approval of the 2021/22 budget at March 2021 Full Council, the Government confirmed the final 2021/22 allocation for two revenue grant areas (public health, and housing benefit subsidy/administration grants). As in 2020/21, a budget virement is proposed for Committee's approval to ensure the budget amounts are amended to reflect these confirmations. The virements are set out in section [1.8] but summarised as follows:

Table 7: Summary of 2021/22 Budget Changes

2021/22 Funding and Budget Summary	March 2021 Full Council £'000	2021/22 Public Health Grant Uplift £'000	2021/22 Housing Benefit and Council Tax Administration Subsidy Grant Uplift £'000	June 2021 P&R Update £'000
Council Tax Income	(198,051)	0	0	(198,051)
Net Business Rates	(64,352)	0	0	(64,352)
Other Grants	(69,615)	(340)	(346)	(70,301)
Budgeted Funding	(332,017)	(340)	(346)	(332,703)
Net Service Expenditure Budgets	332,017	340	346	332,703
Total GF Balanced Budget	0	0	0	0

Contingency

- 5.2 At the meeting of Urgency Committee in April 2020, delegation powers were approved to the Section 151 officer to authorise any virements required directly in response to the Covid-19 pandemic or other related matters and subsequently reported to Policy and Resources Committee. This includes allocations from contingency.
- 5.3 For 2021/22, the council has a total brought-forward budget of £10.069m of contingency funding towards cost pressures and other occurrences. Based on current commitments, a balance £3.973m is forecast to remain.

Budget Virements

- 5.4 The constitution requires that revenue virements from contingency of £250k or above are approved by the Policy & Resources Committee. Approval is requested by the Committee

to vire non-pay inflation of £3.272m and £0.503m for the increase of employer's pension contributions to directorates. These are detailed in appendix A.

- 5.5 Policy & Resources Committee are also asked to approve budget virements between Corporate Accountancy to departments following final confirmation of 2021/22 grants from the Government. These consist of £0.341m for the Public Health grant and £0.347m for the Housing Benefit and Council Tax Administration grants. These are detailed in Appendix A.
- 5.6 Policy & Resources Committee are asked to approve two virements for over £250k between directorates following the transfer of Domestic Violence commissioning and MOPAC funding between Assurance and Children's Family Services for £0.970m and £0.474m between Resources and Growth and Corporate Services following the transfer of pensions administration. These are detailed in Appendix A.
- 5.7 Policy & Resources committee is asked to note that as part of 2020/21 year end outturn, following the final calculation of insurance recharges for 2020/21, budget virements were processed to directorates to offset this charge and ensure no impact on their outturn positions. These are detailed in Appendix A.

Debt Write-Offs

- 5.8 The write-off of debts is in line with good accounting practice, which requires that debtor balances accurately reflect realisable income and it removes uncollectable debt from the accounts. All organisations suffer from uncollectable debt and the council maintains a bad debt provision against which to charge any debt write offs. The following debts over £5,000 are proposed to P&R Committee for approval to write-off and detailed in appendix B.

Sundry Debt

- 5.9 Sundry income totalling £6,258.60 are recommended for write off. The individual debt is over £5,000 and cover the financial years 2019/20 and is uneconomic to pursue
- 5.10 The collection procedures used for the recovery of these debts have included the issue of an invoice, a reminder and also a final notice. Additionally, and where appropriate, debt collection agencies are used and where legal action was undertaken a Notice before Proceedings would have been issued. Efforts have also been made to contact the debtor where possible and to agree suitable instalment arrangements. All avenues of recovery that where economical and practical have been considered before this course of action.

Tenant Arrears – HRA

- 5.11 Tenant Arrears relating to the HRA with individual debts over £5,000 totalling £85,012.35 covering the financial years 2013/14 and 2014/15 are recommended for write off. In addition, P&R are asked to note individual debts under £5,000 totalling £376,920.28 covering the financial years 2013/14 – 2020/21 which are being written off.

Tenant Arrears – General Fund

- 5.12 Tenant Arrears relating to the General Fund with individual debts over £5,000 totalling £178,450.50 covering the financial years 2013/14 & 2014/15 are recommended for write

off. In addition, P&R are asked to note individual debts under £5,000 totalling £357,675.02 covering the financial years 2013/14 – 2020/21 which are being written off.

Capital Programme

- 5.13 The council has a significant capital programme across both the General Fund and the Housing Revenue Account (HRA). Capital projects are considered within the council's overall medium to long term priorities, and the preparation of the capital programme is an integral part of the financial planning process. This includes taking account of the revenue implications of the projects in the revenue budget setting process.
- 5.14 The Capital Programme, incorporating changes approved at this Committee's February 2021 meeting, changes related to the 2020/21 outturn position, and subsequent additions, is described in the following sections.

Table 8: Capital program changes since March 2021 Full Council

Budget Movement Type	2020-21 Outturn	2021-22 Budget	2022-23 Budget	2023-24 Budget	2024-25 Budget	Total Budget
	£000	£000	£000	£000	£000	£000
Feb 2021 P&R Approved Programme	379,825	450,720	197,598	128,256	83,111	1,239,510
Slippage/ Acceleration	(53,464)	39,252	13,583	616	13	0
Additions	962	18,335	706	316	0	20,319
Deletions	(180)	(2,761)	0	0	0	(2,941)
June 2021 P&R Revised Programme	327,144	505,544	211,887	129,188	83,124	1,256,887

- 5.15 The summary of the revised capital programme for this Committee's approval broken down by directorates is as follows:

Table 9: Summary of Proposed Capital Programme after changes

Theme Committee	2021-22	2022-23	2023-24	2024-25	Total
	£000	£000	£000	£000	£000
Adults and Safeguarding	5,814	4,404	4,130	2,974	17,322
Brent Cross	162,053	53,704	2,403	0	218,159
Children, Education & Safeguarding	27,934	13,164	180	0	41,279
Environment	27,063	8,192	8,060	6,383	49,699
Housing and Growth Committee	154,036	66,802	61,683	26,673	309,195
Policy & Resources	24,905	600	600	600	26,705
Total - General Fund	401,805	146,867	77,056	36,630	662,359
Housing Revenue Account	103,739	65,020	52,132	46,494	267,385
Total - all services	505,544	211,887	129,188	83,124	929,744

Slippage

- 5.16 The Capital Outturn position, including all Slippage and acceleration of capital budgets into future years, was presented within the Outturn report at Financial Performance and Contracts Committee on the 8th June 2021. A total of £65.41m has been slipped out of the 2020/21 financial year into future periods, with £11.95m accelerated into 2020/21.
- 5.17 As the council progresses through the financial year, estimates of slippage and accelerated spend will become more accurate. As such, any capital financing adjustments will be presented at this committee with outturn adjustments undertaken by the Chief Financial Officer at year end, in accordance with financial regulations
- 5.18 The breakdown of net slippage and acceleration by Committee is shown below:

Table 10: Summary of Net Slippage

Theme Committee	Net Slippage	Net Acceleration
	£000	£000
Adults and Safeguarding	(1,358)	0
Brent Cross	(29,619)	0
Children, Education & Safeguarding	(1,399)	74
Environment	(9,150)	5
Housing and Growth Committee	(12,577)	6,449
Policy & Resources	(1,097)	100
Housing Revenue Account	(10,211)	5,320
Total at Month 2	(65,411)	11,947

Additions

- 5.19 Public Sector Decarbonisation (PSDS) – Phase 1 (£1.38m) – PSDS funds heat decarbonisation. This is grant funding from the Department of Business, Energy, and Industrial Strategy (BEIS) and is managed by Salix Finance. The PSDS project will install energy saving measures to reduce carbon footprint across Barnet’s corporate estate and realise financial savings.
- 5.20 Barnet Hill A1000 Embankment Works (£0.12m) - Feasibility study to enable suitable short-term mitigation and long-term remedial measures to be devised for A1000 Barnet Hill Embankment. This will address slope instability that is currently resulting in local subsidence. Funded through Council borrowing.
- 5.21 Minor Highways Improvements (£0.92m) – Addition to the council’s Highways Capital programme, which supports the delivery of minor carriageway, footway and other ad-hoc projects in line with the Councils duties as Highways Authority under the highways act 1980. Funded through Borrowing.
- 5.22 Graham Park NE (£1.468m) – Regeneration proposal for North East part of Graham Park Estate. A budget of £1.468m is required to progress the project to Outline Business Case stage. This budget will enable thorough due diligence to be undertaken for the proposed phase, as well as design progression. Funded from Council Borrowing. The project aims

to achieve savings from repairs on regen estate, rental income and council tax and service charges.

- 5.23 Modernisation – Primary & Secondary (£3.586m) - The DfE have awarded the London Borough of Barnet £3,585,862 for School Condition allocations for the FY 2021/22. This funding is used for the modernisation programme across different primary & secondary maintained schools. This funding is given by the DfE to help maintain and improve the condition of school buildings and grounds.
- 5.24 Housing Acquisitions Open Door (£5.175m):
- Opendoor Homes (ODH) have been awarded a £1.95m grant to support housing Rough Sleepers from the MHCLG and GLA, for properties purchased by 31 March 2021. This addition seeks to increase the budget for this capital programme to reflect the pass through of the grant.
 - Addition to the budget related to £3.225m funding applied to the Working Capital element of 156 properties transferred to Open Door in 2021. This was previously written out of the Capital programme in error. Funding from Borrowing.
- 5.25 Meadow Close Children’s Homes (£0.072m) – A budget amendment of £0.072m related to the investment in a relocated Children’s Home at 27 Woodside Avenue. The project made use of existing resources within the programme to fund expenditure in 2020/21.
- 5.26 Brent Cross Thameslink (£4.063m) – LBB and Brent Cross South Limited Partnership (BXS LP) have entered into a Side Agreement to the Station Strategy, with BXS LP funding the Station Eastern Entrance Building Base Cost. The total funding to be provided is £4.063m.
- 5.27 Estate REFIT Project (£0.425m) – This project aims to install energy saving measures into buildings such as libraries, depot, town hall. This project commenced in 2020/21, with a loan from Salix finance already received to fund qualifying expenditure. Retrospective approval is requested on this basis.
- 5.28 Area Committee (£0.465m) – This relates to the 2020/21 Outturn position for CIL funded Area Committees; Chipping Barnet (£0.152m), Hendon (£0.123m) and Finchley/ Golders Green (£0.19m).

Budget movements

- 5.29 Colindale Future of Works Modification (£2.761m) – Retaining existing Colindale Office build and Barnet House Exist works budget and refocusing towards the Colindale Future of Work Programme. This includes a new workplace programme post Covid-19 and the landscaping of Colindale Southern Square. Funded from Borrowing.
- 5.30 Thameslink Station (£2.5m) – Transferring £2.5m Brent Cross Land Acquisition Budget to Thameslink Station works in 2022/23. Pre-approved and funded from Borrowing.

Total Additions

- 5.31 The profiling of the additions described above is set out in the below summary table:

Table 11: Summary of Proposed Additions to the Capital Programme

Additions	2020-21	2021-22	2022-23	2023-24	2024-25	Total
	£000	£000	£000	£000	£000	£000
Public Sector Decarbon Scheme Phase 1	0	1,381	0	0	0	1,381
Barnet Hill - A1000 Embankment Works	0	0	0	0	0	0
Minor Highways Improvements	0	300	307	316	0	923
Graham Park NE	0	1,468	0	0	0	1,468
Barnet Innovation	0	0	0	0	0	0
Modernisation - Primary & Secondary	0	3,586	0	0	0	3,586
Meadow Close Children's Homes	72	0	0	0	0	72
Housing acquisitions Open Door	0	5,175	0	0	0	5,175
Thames Link Station	0	3,664	399	0	0	4,063
Colindale Future of Work Modifications	0	2,761	0	0	0	2,761
Estates REFIT Project	425	0	0	0	0	425
Area Committees	465	0	0	0	0	465
Total at Month 2	962	18,335	706	316	0	20,319

5.32 Including the slippage and additions described previously, the changes to be incorporated into the revised Capital Programme are as follows:

Table 12: Summary of Changes Proposed to Revised Capital Programme

Theme Committee	Net Slippage & Accelerated spend	Deletions	Additions
	£000	£000	£000
Adults and Safeguarding	(1,358)	0	0
Brent Cross	(29,619)	0	4,063
Children, Education & Safeguarding	(1,325)	0	3,658
Environment	(9,145)	0	923
Housing and Growth Committee	(6,128)	(2,941)	11,675
Policy & Resources	(997)	0	0
Housing Revenue Account	(4,891)	0	0
Total at Month 2	(53,464)	(2,941)	20,319

5.33 The funding for the capital programme shown above (table 9) is set out below.

Table 13: Financing for Proposed Capital Programme

Theme Committee	Grants	S106	Capital Receipts	RCCO/ Depr	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000
Adults and Safeguarding	12,439	417	90	0	3,997	379	17,322
Brent Cross	204,281	0	900	0	0	12,979	218,159
Children, Education & Safeguarding	38,723	2	342	0	406	1,805	41,279
Environment	686	4,095	408	0	7,868	36,640	49,699
Housing and Growth Committee	53,484	7,774	12,980	491	15,035	219,431	309,195
Policy & Resources	1	0	1,252	0	5,000	20,451	26,705
Total - General Fund	309,615	12,289	15,973	491	32,306	291,686	662,359
Housing Revenue Account	19,992	0	3,352	79,062	0	164,979	267,385
Total - all services	329,607	12,289	19,325	79,554	32,306	456,664	929,744

Borrowing

- 5.34 £456,664m of the total capital programme will be funded from borrowing of which £153.5m is to be on-lent to Opendoor Homes for the acquisition or delivery of new housing.
- 5.35 Borrowing is typically, Public Works Loan Board loans to support capital expenditure; this type of capital funding has revenue implications (i.e. interest and provision to pay back loan).

Capital Receipts

- 5.36 The council has previously highlighted a risk in the level of capital receipts that it currently holds or forecasts to receive. Capital receipts are proceeds of capital sales (land, buildings, etc.) and are re-invested into purchasing other capital assets.
- 5.37 £19.325m of the above capital programme is planned to be funded by capital receipts. Current receipts are standing at £11.176m with £10.294m HRA receipts and £0.9m General Fund receipts. The current disposal programme estimates a further £15.35m General Fund disposals to be achieved within this financial year.
- 5.38 Of the £14.964m capital receipts planned to fund expenditure in 2021/22, £3.35m will be funded from HRA capital receipt (RTB Receipts). HRA funding will also finance Open Door New Build Housing (£3.98m), of which is shown in the above table under Housing and Growth Committee. Current HRA capital receipt balances plus future estimates suggest that there will be enough HRA capital receipts to fund the relevant projects.

- 5.39 The remaining £7.63m is expected to come from General Fund capital receipts. The council has received £0.9m from General Fund disposals, with £12.49m capital receipts forecast this financial year. The current forecasted Capital Receipt surplus will be £4.86m General Fund and £2.96m HRA.

Capital Grants & Contributions

- 5.40 The current capital programme shows £329.607m to be funded from Capital Grants. S106 and CIL are standing at £12.289m and £32.306m respectively.
- 5.41 Capital grants are mainly received from central government departments (such as the Brent Cross grant from MHCLG) or other partners or funding agencies (such Transport for London, Education Funding Authority).
- 5.42 S106 contributions are a developer contribution towards infrastructure; confined to specific area and to be used within specific timeframe.
- 5.43 Community Infrastructure Levy (CIL) funds are developer contribution towards infrastructure; can be used borough wide but still has time restrictions on use.
- 5.44 Current capital programme forecasts plus future estimates suggest that there will be enough S106 contributions to fund the relevant projects.

Release of funds to TfL for extension of 125 Bus Route - Sponsored Route Agreement

- 5.45 Approval is needed by Policy & Resources Committee to formally release £0.892m of S106 monies to pay TfL for the 125 bus route extension. From Saturday 25 May 2019 TfL extended the 125 route between Finchley Central and Colindale station. The 125 bus route now runs between Winchmore Hill and Colindale every 10 minutes Monday to Saturday daytimes and every 15 minutes Sunday daytime and each evening. This is discussed further and broken down in Appendix A.

Housing Revenue Account (HRA) Business Plan

HRA - Reserve Balances and Business Plan

- 5.46 The HRA budget for 2020/21 anticipated a contribution from reserves of £2.541m. The estimated HRA balance as at 31 March 2020 is £4.000m. The level of HRA balances will be closely monitored in conjunction with the HRA business plan to ensure balances are available to support the delivery of these plans.
- 5.47 A summary of the reserves position is shown below, noting that from 1st April 2021 the HRA reserve balance will be maintained at £4.000m through the use of capital contributions (in line with best practice).

Table 14: HRA reserve

HRA Movement	£'000
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HRA Reserve Balance b/f 20/21	7,525
20/21 in-year forecast deficit	(3,525)
Estimated Balance to March 2021	4,000

5.48 The HRA business plan was submitted to the Housing and Growth Committee on 14 June 2021. The HRA business plan reported good progress being made. The headlines include; the completion of 40 new council homes for rent, a 53 unit extra care housing scheme at Ansell Court in Mill Hill and the acquisition of 21 properties in London to let at affordable rents to homeless applicants. A grant has been secured from the Greater London Authority under the Building Council Homes for Londoners Programme to support the building of 87 new council homes in Barnet. The 2021/22 HRA budget set out in the HRA Business Plan is shown below.

Table 15: HRA budget (arising from refreshed business plan)

HOUSING REVENUE ACCOUNT	2021/22 Budget
Income	£'000
Dwelling rents	(49,813)
Non-dwelling rents	(759)
Tenants Charges for services and facilities	(3,519)
Leaseholder Charges for services and facilities	(2,915)
Other Income	(200)
General Provision	0
Total Income	(57,206)
Expenditure	
Repairs and Maintenance	7,869
'Building Safer Future' funding	850
General	21,810
Special	2,457
Depreciation and impairment of fixed assets	12,220
Debt Management Expenses	8,854
Revenue Contribution to Capital	2,042
Increase in bad debt provision	1,070
Total Expenditure	57,172
Net Cost/(Income) of HRA Services	(34)
Interest and investment income	(11)
(Surplus) or deficit	(45)
Accumulated Reserve (Surplus)	(4,020)

5.49 The council and Barnet Homes have always taken fire safety very seriously and ensuring the safety of residents was already a top priority for our investment programme. Following the Grenfell Tower fire in 2017, the council has committed to going beyond its statutory obligations to meet best practice in fire safety measures, and a priority for the HRA business plan going forward will be to deliver this commitment through an investment programme totalling £51.9m.

5.50 The council has continued to invest in existing council homes which continue to be maintained to the Decent Homes standard. Other projects to be supported by the HRA Business Plan include two additional extra care schemes, providing 125 new homes, and

a further project to provide an additional 20 council flats by adding a floor to existing buildings.

HRA – Right to Buy (RTB) Receipts

- 5.51 The council has entered into an agreement with the former Department for Communities and Local Government (DCLG) – now MHCLG, to retain an element of the RTB receipts for investment in building or acquisition of new social housing. To date, up to 30% of the retained receipts must be spent on the cost of replacement affordable rented homes.
- 5.52 Recent changes in Right to Buy receipts rules has meant that receipts now have 5 years to be utilised for the provision of replacement homes, rather than the 3 years and the amount that can be used has increased from 30% to 40% of the development spend.
- 5.53 The council uses the receipts to increase housing supply by purchasing property and supporting the development of new homes, thereby minimising the risk of there being unused receipts. If the council is unable to use retained receipts within the three-year period, the council intends entering into an agreement with the Greater London Authority on Right to Buy Receipts which will ensure that the council still has access to receipts in the form of affordable housing grant that it might have to otherwise repay to the Treasury. This is available to all London boroughs and will provide access to any receipts that would otherwise be returned to the Treasury for a further three years.
- 5.54 In addition, the HRA settlement in 2012 included a debt cap of £240m which provided the council with the opportunity to borrow an additional £38m as a result of headroom generated by differences between the actual HRA debt and the amount assumed in the settlement. However, in October 2018, the government removed the debt cap and the HRA is now subject to the same prudential borrowing rules as the General Fund.
- 5.55 The removal of the debt cap provides an opportunity to increase the supply of affordable homes in the borough as it means that the council can borrow more to support the acquisition or building of new homes. The HRA business plan sets out how this is proposed to be taken forward.

Corporate Risk Register

- 5.56 The council has an established approach to risk management, which is set out in the risk management framework. The strategic and service/joint risks are reviewed on a quarterly basis to ensure they remain relevant and the controls/mitigations in place to manage the risks remain effective.
- 5.57 The strategic and service/joint risks were reviewed in Q4 2020/21 and updated to reflect changes. 22 risks were scored at a 'high-level' (15+), including three strategic risks on the economy, funding uncertainty, and environmental sustainability. Three service/joint risks increased to a 'high-level' this quarter on delivery of employment schemes, appeals and public inquiry impact on resources, and accommodation in the private rented sector; and a new joint risk was scored at a 'high level' on IT cyber security. These are set out in the corporate risk register appended to this report (Each quarter the strategic risks and 'high-level' (15+) service/joint risks are combined to form the corporate risk register).

6. REASONS FOR RECOMMENDATIONS

- 6.1 The MTFS sets out the estimated overall financial position of the council over a period of time. This report recommends proposed changes to the MTFS process to work towards a balanced budget for 2022/23 and to reduce the gap savings requirement for 2023/24 to 2024/25. This ensures that Councillors and the public are informed of this work, supporting good governance.
- 6.2 This report also includes ongoing budget maintenance in the form of virements and the allocation of contingency funds to ensure strong financial management.
- 6.3 The revisions to the capital programme discussed in this report ensure that the council's financial planning accurately reflects what is happening with scheme delivery. This ensures that the council can make effective decisions on the deployment of its scarce resources.

7. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 7.1 A simple 'savings and pressures' approach could be taken to the budget process for 2022/23, but this would not fully support the much-needed focus on reviewing all budgets, as it focuses on key areas of change or opportunity rather than underlying budget allocations.

8. POST DECISION IMPLEMENTATION

- 8.1 Following approval of the recommendations in this report, budget changes will be processed in the financial accounting system and reflected against service areas for 2021/22 for revenue and capital.

9. IMPLICATIONS OF DECISION

9.1 Corporate Priorities and Performance

- This report supports the council's vision set out in the new Barnet Plan for 2021-25. The Plan has been developed alongside the ongoing Covid-19 pandemic and reflects the views following consultation of residents and stakeholders. The Plan sets out four priorities:
 - Clean, safe and well run;
 - Family friendly;
 - Healthy and
 - Thriving
- The four priorities above will be delivered using a preventative approach whilst also considering equalities in all the council does.

9.2 Resources (Finance & Value for Money, Procurement, Staffing, IT, Property, Sustainability)

- The report considers strategic financial matters and refreshes the current position of the council’s MTFS. Plans will be enacted to work and identify savings and ensure they go through the appropriate governance process to set a legal budget in March 2022.
- The proposed changes to the capital programme will have an impact on the cost of borrowing and therefore support the council’s revenue budget.
- The council’s financial regulations require that virements for allocation from contingency for amounts over £250,000 and capital programme additions must be approved by Policy and Resources Committee.

9.3 Legal and Constitutional References

- Section 151 of the Local Government Act 1972 states that: “without prejudice to section 111, every local authority shall make arrangements for the proper administration of their financial affairs and shall secure that one of their officers has responsibility for the administration of those affairs”. Section 111 of the Local Government Act 1972, relates to the subsidiary powers of local authorities.
- Under Section 114 of the Local Government Finance Act 1988, the chief finance officer (S151 Officer) of a relevant authority shall make a report under this section if it appears to them that the expenditure of the authority incurred (including expenditure it proposes to incur) in a financial year is likely to exceed the resources (including sums borrowed) available to it to meet that expenditure.
- Article 7 of the Council’s Constitution sets out the terms of reference of the Policy and Resources Committee which include:
 - Responsibility for strategic policy finance and corporate risk management including recommending: Capital and Revenue Budget; Medium Term Financial Strategy; and Corporate Plan to Full Council;
 - To be responsible for the overall strategic direction of the Council including strategic partnerships, Treasury Management Strategy and internal transformation programmes;
 - To be responsible for those matters not specifically allocated to any other committee affecting the affairs of the Council.
- The council’s financial regulations state that amendments to the revenue budget can only be made with approval as per the scheme of virement table below:

Virements for allocation from contingency for amounts up to £250,000 must be approved by the Section 151 Officer in consultation with appropriate Chief Officer
Virements for allocation from contingency for amounts over £250,000 must be approved by Policy and Resources Committee
Virements within a service that do not alter the bottom line are approved by Service Director

Virements between services (excluding contingency allocations) up to a value of £50,000 must be approved by the relevant Chief Officer
Virements between services (excluding contingency allocations) over £50,000 and up to £250,000 must be approved by Chief Officer and Chief Finance Officer in consultation with the Chairman of the Policy and Resources Committee and reported to the next meeting of the Policy and Resources Committee
Virements between services (excluding contingency allocations) over £250,000 must be approved by Policy and Resources Committee
Policy and Resources Committee approval is required for all capital budget and funding virements and yearly profile changes (slippage or accelerated spend) between approved capital programmes i.e. as per the budget book. The report must show the proposed: i) Budget transfers between projects and by year; ii) Funding transfers between projects and by year; and iii) A summary based on a template approved by the Section 151 Officer
Policy and Resources Committee approval is required for all capital additions to the capital programme. Capital additions should also be included in the quarterly budget monitoring report to Financial Performance and Contracts Committee for noting.
Funding substitutions at year end in order to maximise funding are the responsibility of the Section 151 Officer.

- Article 4 sets out the role of Full Council “approving the strategic financing of the council upon recommendations of the Policy and resources committee, determination of financial strategy, approval of the budget, approval of the capital programme”. Council will set the budget and Policy and Resources Committee will work within that set budget subject to the rules on virements contained in the Financial Regulations.

9.4 **Insight**

- The MTFs already makes use of data and models from different sources and these include Central Government projections e.g. forecasts from the Office of Budget Responsibility on CPI inflation, in-year trend data on changes to Council Tax as a basis for future estimates and models of budget spend e.g. on capital and the resulting impact on financing. The MTFs process for the upcoming year will place an increase focus on a data-led approach to support estimates of pressures and savings offered.

9.5 **Social Value**

- None that are applicable to this report, however the council must take into account the requirements of the Public Services (Social Value) Act 2012 to try to maximise the social and local economic value it derives from its procurement spend. The Barnet living wage is an example of where the council has considered its social value powers.

9.6 **Risk Management**

- The council has taken steps to improve its risk management processes by integrating the management of financial and other risks facing the organisation. The allocation of an amount to contingency is a step to mitigate the pressures that had yet to be quantified during the budget setting process.
- The allocation of budgets from contingency seeks to mitigate financial risks which have materialised.

9.7 Equalities and Diversity

- Equality and diversity issues are a mandatory consideration in the decision-making of the council.
- Decision makers should have due regard to the public-sector equality duty in making their decisions. The equalities duties are continuing duties they are not duties to secure a particular outcome. The equalities impact will be revisited on each of the proposals as they are developed. Consideration of the duties should precede the decision. It is important that Council has regard to the statutory grounds in the light of all available material such as consultation responses. The statutory grounds of the public-sector equality duty are found at section 149 of the Equality Act 2010 and are as follows below.
- A public authority must, in the exercise of its functions, have due regard to the need to:
 - a. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
 - d. remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - e. take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - f. Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- g. Tackle prejudice, and
- h. Promote understanding
- Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act. The relevant protected characteristics are:
 - Age
 - Disability
 - Gender reassignment
 - Pregnancy and maternity
 - Race,
 - Religion or belief
 - Sex
 - Sexual orientation
 - Marriage and Civil partnership
- If deemed appropriate, a project may be subject to future individual committee decision once the budget envelope has been set by Council. The equality impacts will be updated for these decisions. Reserves may be used to avoid adverse equality impacts.
- The Equality Act 2010 and The Public Sector Equality Duty impose legal requirements on elected Members to satisfy themselves that equality impact considerations have been fully taken into account in developing the proposals which emerge from the finance and business planning process, together with any mitigating factors. To allow the Council to demonstrate that it has met the Public Sector Equalities Duty as outlined above, each year the Council undertake a planned and consistent approach to business planning. This assesses the equality impact of relevant budget proposals for the current year (affecting staff and/or service delivery) across services and identifies any mitigation to ease any negative impact on particular groups of residents. This process is refined as proposals develop and for the Council meeting it includes the assessment of any cumulative impact on any particular group.
- All human resources implications of the budget savings proposals will be managed in accordance with the council's Managing Organisational Change policy that supports the council's Human Resources Strategy and meets statutory equalities duties and current employment legislation.
- This is set out in the council's Equalities Policy together with our strategic Equalities Objective - as set out in the Corporate Plan - that citizens will be treated equally with understanding and respect; have equal opportunities and receive quality services provided to best value principles.
- Progress against the performance measures we use is published on our website at <https://www.barnet.gov.uk/your-council/policies-plans-and-performance/equality-and-diversity/equality-impact-assessments-0>

9.8 Corporate Parenting

- In line with Children and Social Work Act 2017, the council has a duty to consider Corporate Parenting Principles in decision-making across the council. The outcomes and priorities in the refreshed Corporate Plan, Barnet 2025, reflect the council's commitment to the Corporate Parenting duty to ensure the most vulnerable are protected and the needs of children are considered in everything that the council does. To this end, great attention has been paid to the needs of children in care and care leavers when approaching business planning, to ensure decisions are made through the lens of what a reasonable parent would do for their own child.
- Council, in setting its budget, has considered the Corporate Parenting Principles both in terms of savings and investment proposals. The Council proposals have sought to protect front-line social work and services to children in care and care leavers and in some cases, has invested in them.

9.9 Consultation and Engagement

- As a matter of public law, the duty to consult with regards to proposals to vary, reduce or withdraw services will arise in four circumstances:
 - where there is a statutory requirement in the relevant legislative framework;
 - where the practice has been to consult, or, where a policy document states the council will consult, then the council must comply with its own practice or policy;
 - exceptionally, where the matter is so important that there is a legitimate expectation of consultation;
 - where consultation is required to complete an equalities impact assessment
- Consultation is also recommended in other circumstances, for example to identify the impact of proposals or to assist with complying with the council's equalities duties
- Regardless of whether the council has a duty to consult, if it chooses to consult, such consultation must be carried out fairly. In general, a consultation can only be considered as proper consultation if:
 - Comments are genuinely invited at the formative stage;
 - The consultation documents include sufficient reasons for the proposal to allow those being consulted to be properly informed and to give an informed response;
 - There is adequate time given to the consultees to consider the proposals;
 - There is a mechanism for feeding back the comments and those comments are considered by the decision-maker / decision-making body when making a final decision;
 - The degree of specificity with which, in fairness, the public authority should conduct its consultation exercise may be influenced by the identity of those whom it is consulting;
 - Where relevant and appropriate, the consultation is clear on the reasons why and extent to which alternatives and discarded options have been discarded. The more intrusive the decision, the more likely it is to attract a higher level of procedural fairness.
- The council will conduct a budget consultation between December 2021 through to January 2022. This consultation will cover any proposals to increase council tax together with seeking views on the council's budget overall.

BACKGROUND PAPERS

Committee	Item & Agenda	Link
Full Council 02 March 2021	Item 10.1 Business Planning – Corporate Plan, Budget for 2021/22, and Medium-Term Financial Strategy 2021-25	https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=162&MId=10237
Policy & Resources 8 February 2021	Item 9 Business Planning – Corporate Plan, Budget for 2021/22, and Medium-Term Financial Strategy 2021-25	https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=692&MId=10200
n/a	MHCLG MRP Guidance	Statutory_guidance_on_minimum_revenue_provision.pdf (publishing.service.gov.uk)
Policy & Resources 8 December 2020	Item 7 Business Planning 2021-2025 and Budget Management 2020/21	https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=692&MId=10199
Financial Performance and Contracts Committee 7 December 2020	Item 7 Chief Financial Officer Report Forecast Financial Outturn at Month 7 (October 2020)	https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=693&MId=10108
Children, Education and Safeguarding Committee 30 November 2020	Item 8 Business Planning 2021-25	https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=697&MId=10095
Environment Committee 25 November 2020	Item 7 Business Planning 2020-25 and Fees & Charges for 2021-22	https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=695&MId=10157
Housing and Growth Committee 24 November 2020	Item 8 Business Planning 2020-25	https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=696&MId=10227
Adults and Safeguarding Committee 23 November 2020	Item 7 Business Planning 2020-25	https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=698&MId=10204
Policy & Resources 24 September 2020	Item 8 Business Planning 2021 to 2025 and Budget Management 2020/21	https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=692&MId=10198
Policy & Resources 17 June 2020	Item 8 Outturn 2019/20; Budget 2020/21 and Business Planning 2021 - 2025	https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=692&MId=10197

Urgency Committee 27 April 2020	Item 7 Approval of Emergency Decision and Delegation to Chief Officers	https://barnet.moderngov.co.uk/ieListDocuments.aspx? CId=716&MId=10375
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Appendix A Routine Financial Matters

The following routine financial matters are requested to be approved or noted as appropriate by the Committee:

A1 Budget Virements: Central Expenses

These are for £3.272m of non-pay inflation and £0.503m for employer's pension contribution increases to directorates to be funded by the central expense budget:

Department	Description	Amount £'000
Adults & Health	21/22 Share of Non-Pay Inflation	1,453,216
Children's Family Services	21/22 Share of Non-Pay Inflation	736,207
Growth & Corporate Services	21/22 Share of Non-Pay Inflation	637,342
Environment	21/22 Share of Non-Pay Inflation	362,824
Resources	21/22 Share of Non-Pay Inflation	49,291
Assurance	21/22 Share of Non-Pay Inflation	33,595
Resources Central Expenses	21/22 Share of Non-Pay Inflation	(3,272,475)
Children's Family Services	Budgeted cost of Employer's Pension contribution rate increase based on triennial valuation	158,308
Environment	Budgeted cost of Employer's Pension contribution rate increase based on triennial valuation	122,799
Adults & Health	Budgeted cost of Employer's Pension contribution rate increase based on triennial valuation	102,213
Resources	Budgeted cost of Employer's Pension contribution rate increase based on triennial valuation	38,883
Growth & Corporate Services	Budgeted cost of Employer's Pension contribution rate increase based on triennial valuation	38,779
Assurance	Budgeted cost of Employer's Pension contribution rate increase based on triennial valuation	30,493
Public Health	Budgeted cost of Employer's Pension contribution rate increase based on triennial valuation	11,387
Resources Central Expenses	Budgeted cost of Employer's Pension contribution rate increase based on triennial valuation	(502,862)

A2 Budget Virements: Grant Funding

Based on final confirmation of 2021/22 grant funding announced after March 2021 Full Council, the council will receive £0.341m of Public Health grant and £0.347 for Housing Benefit and Council Tax Administration grants over 2020/21 allocations:

Department	Description	Amount £'000
Public Health	Grossing up of 2021/22 Public Health Grant	340,588
Corporate Accountancy - Grants	Grossing up of 2021/22 Public Health Grant	(340,588)
Resources Contingency	Grossing up of 2021/22 Housing Benefit and Council Tax Administration Grant	346,820
Corporate Accounting - Grants	Grossing up of 2021/22 Housing Benefit and Council Tax Administration Grant	(346,820)

A3 Budget Virements: Between Directorates

Approval is requested from Committee for two budget virements over £250k between directorates and for Committee to note a budget virement under £250k between Adults and Health and Growth and Corporate Services:

Department	Description	Amount £'000
Children's Family Services	Transfer of Domestic Violence commissioning and MOPAC funding	970,062
Assurance	Transfer of Domestic Violence commissioning and MOPAC funding	(970,062)
Resources	Pensions Administration transfer	474,562
Growth & Corporate Services	Pensions Administration transfer	(474,562)
Adults & Health	Transfer of service responsibility	242,000
Growth & Corporate Services	Transfer of service responsibility	(242,000)

A4 2020/21 Year End Budget Virement: Insurance Recharges

Committee is asked to note the following budget virement processed for under £250k between directorates for 2020/21 only as part of finalising 2020/21 year end outturn for insurance recharges. This was approved by the Section 151 Officer:

Service	Amount
Adults and Health	119,999
Assurance	18,509
Children's Family Services	111,296
Streetscene & Waste	192,981
Growth and Corporate Services	165,052
Public Health	18,929
Resources	77,345
Regional Enterprise	(1,939)
Highways & Management	229,769

A5 Debt-Write Offs: Sundry Debt

Sundry income totalling £6,258.60 are recommended for write off. An individual debt for £6,258.60 is over £5,000 from 2019/20 is recommended for write-off as it is uneconomic to pursue.

A6: Debt-Write-Offs: Housing Revenue Account Tenant Arrears

All the debts detailed relate to closed accounts and are considered:

- 'statute barred' where the Council is legally unable to recover any monies from the tenants as the time allowed by law for such recovery has passed.
- low level debts of £20 or under where the recovery of the monies is deemed uneconomical
- Debts between £20-£100 where contact has been attempted with no success are deemed uneconomical.

Attempts to recover the monies owed by former tenants including following up on known contact details, referring cases to external expert agencies, such as search and debt recovery agencies and working with other local authorities/ housing agencies and probate checks. The definition of "Unsuccessful from Agency" is where the debt has been assigned to an external agency, but they have been unsuccessful in recovering any of the debt or have been unable to trace the former tenant.

The following are debts for over £5,000 that are recommended to the Committee for write-off:

Years	Reason	Total
2013/14	Statute Barred	£14,712.30
2014/15	Statute Barred	£70,300.05
Total		£85,012.35

The committee is asked to note the following debts under £5,000 totalling £376,920.28 which have been approved for write-off through a delegated powers report

Debt Category	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total
Deceased with Estate	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
Statute Barred	£232,085.86	£136,207.13	£8,243.12	£0.00	£0.00	£0.00	£0.00	£0.00	£376,536.11
Unable to Trace	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
Uneconomic to Pursue	£0.00	£0.00	£0.00	£0.00	£60.65	£229.41	£66.14	£27.97	£384.17
Unsuccessful from Agency	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
Total	£232,085.86	£136,207.13	£8,243.12	£0.00	£60.65	£229.41	£66.14	£27.97	£376,920.28

A7: Debt-Write-Offs: General Fund Tenant Arrears

The following are debts for over £5,000 that are recommended to the Committee for write-off:

Years		Total
2013/14	Statute Barred	£22,311.86
2014/15	Statute Barred	£156,138.64
Total		£178,450.50

The committee is asked to note the following debts under £5,000 totalling £357,675.02 which have been approved for write-off through a delegated powers report:

Debt Category	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total
Deceased with Estate	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
Statute Barred	£9,168.35	£342,430.58	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£351,598.93
Unable to Trace	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
Uneconomic to Pursue	£0.00	£38.56	£0.00	£0.06	£0.00	£5.32	£19.13	£73.34	£136.41
Unrecoverable: Severe Weather Emergency Protocol (SWEPE)	£0.00	£0.00	£0.00	£3,485.46	£2,454.22	£0.00	£0.00	£0.00	£5,939.68
Unsuccessful from Agency	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
Total	£9,168.35	£342,469.14	£0.00	£3,485.52	£2,454.22	£5.32	£19.13	£73.34	£357,675.02

A8: Release of Capital Financing to TfL

The London Borough of Barnet (the Sponsor) wishes to have the bus services enhanced through the provision of an extension to the route of the services for a certain period of time and/or the provision of a higher frequency of buses operating on the Services. However, such an enhancement to the bus services could not be provided without the need for additional expenditure being incurred by the TfL under the terms of its agreement with the bus operator.

The Committee is asked to approve the release of £0.891m of s106 funds (breakdown below) to TfL.

Under section 177 of the GLA Act, LBB as the sponsor authority and TfL (The Corporation) have powers to enter into agreements under which LBB (The Sponsor) contributes towards the expenditure incurred by any person providing a public passenger transport service. Under the provisions of section 164 of the GLA Act, TfL is permitted to exercise this power, and TfL is willing to secure enhancements to the services on the basis that LBB will contribute to the costs of operating the services as set out in this Agreement.

Providing the Enhanced Service during a five-year term of this Agreement and which will not be offset by the revenue it retains in relation to the Enhanced Service.

The Parties acknowledge and agree that the total sum shown in table below (see below) shall be paid by LBB to TfL irrespective of the actual costs incurred and revenue received by TfL during the term of this Agreement. TfL will be responsible for payment of the difference between the Cost Limit to be paid by LBB and the estimated Net Deficit Sum.

It is agreed that TfL shall retain all on-bus and off-bus revenue. The 125 bus route extension has already happened and the sponsored route agreement needs to be signed off and payment must be made to TfL for the 125 bus route extension. The 125 route extension went to public consultation by TfL from October to November 2017 and the consultation report was published in June 2018. See here: https://consultations.tfl.gov.uk/buses/routes-125-303-305/user_uploads/colindale-bus-service-changes-consultation-report.pdf

Colindale and Burnt Oak is a large area of housing and office development that is increasing demand for public transport in the area. It is included in the London Plan of the Greater London Authority (GLA) as a growth area with at least 12,000 new homes and 2,000 jobs to be provided. This development is concentrated around Edgware Road, Colindale Station, Grahame Park and Aerodrome Road. The 125 bus route was extended to respond to this. The route extension was planned to add capacity to the already busy and growing corridors between Finchley, Hendon and Colindale and to create a new orbital link across the London Borough of Barnet, with new direct links as follows:

- New London Borough (LB) of Barnet headquarters at Colindale for staff and visitor who live on the east of the borough;
- Aerodrome Road to Colindale Station;

- Colindale to Hendon town centre, Finchley, Whetstone and LB Enfield;
- Hendon/Finchley Lane to Ballards Lane/North Finchley;
- Middlesex University main campus to student accommodation at Colindale.

The summary of funding to be applied is:

App No	Site Address	Covenant	Available (£)
H/04167/10	Zenith House, Edgware Road	Bus Improvement Contribution' means the sum of £155,000 (one hundred and fifty-five thousand pounds) Index linked comprising (a) £20,000 (twenty thousand pounds) towards bus stop improvements in accordance with the priorities identified in the CAAP and (b) £135,000 (one hundred and thirty-five thousand pounds) Index Linked towards bus enhancements in accordance with the priorities identified in the CAAP	20,405.00
H/04167/10	Zenith House, Edgware Road	Bus Improvement Contribution' means the sum of £155,000 (one hundred and fifty-five thousand pounds) Index linked comprising (a) £20,000 (twenty thousand pounds) towards bus stop improvements in accordance with the priorities identified in the CAAP and (b) £135,000 (one hundred and thirty-five thousand pounds) Index Linked towards bus enhancements in accordance with the priorities identified in the CAAP	149,940.48
H/05828/14	Homebase, Rookery Way	Bus Service Contribution means the sum of Two Hundred and Seventy-Five Thousand Pounds (£275,000) Index-Linked towards upgrading bus services in the vicinity of the Development for five (5) years	140,308.29
W01708X/99	Part Inglis Barracks Site	2.2 The monies paid to the Council by the Developer pursuant to paragraph 2.1 above shall be expended by the Council for public transport and highway improvements in the vicinity of the Development including the provision of or improvements to bus routes	26,715.00
F/00821/13	Carmelite Monastery 119 Bridge Lane	Public transport contribution means the sum of £10,000 (ten thousand pounds) Index Linked towards the costs of providing required changes and improvements to the public transport provisions within the Borough of Barnet	10,000.00
H/03551/14	Barnet and Southgate College	Bus Service Contribution means the sum of £95,000 Index-Linked per year for 5 years (£475,000 total Index Linked) payable by the Owner towards improvements to bus services in the vicinity of the site	102,276.60
H/03551/14	Barnet and Southgate College	Bus Service Contribution means the sum of £95,000 Index-Linked per year for 5 years (£475,000 total Index Linked) payable by the Owner towards improvements to bus services in the vicinity of the site	102,276.60
H/00342/09	Colindale Hospital Colindale Avenue London NW9 5HG	Means the sum of £500,000 Index Linked to be paid to the Council by the Owner for the purpose of making improvements to the public transport infrastructure within the area of the CAAP.	100,000.00

App No	Site Address	Covenant	Available (£)
	Colindale Office Project	Capital funding from Colindale Office capital budget	240,000.00
Total			891,921.97

Appendix B

P&R Additions, Deletions, Slippage, accelerated spend

Year	Theme	Programme	Deletions/Transfers	Additions	Net Slippage & Accelerated spend	Explanation for request	Funding
2020-21	Adults and Safeguarding	Sport and Physical Activities			(45)	Budget Reprofile	Grant and Contributions
2020-21	Adults and Safeguarding	Community Equipment and Assistive Technology			(107)	Budget Reprofile	CIL
2020-21	Adults and Safeguarding	Investing in IT			(379)	Budget Reprofile	Borrowing
2020-21	Adults and Safeguarding	Disabled Facilities Grants Programme			(760)	Budget Reprofile	Grant and Contributions
2020-21	Children, Education & Safeguarding	Modernisation - Primary & Secondary			(608)	Budget Reprofile	Grant and Contributions
2020-21	Children, Education & Safeguarding	Saracens Primary			(6)	Budget Reprofile	Grant and Contributions
2020-21	Children, Education & Safeguarding	Grammar school projects			(176)	Budget Reprofile	Grant and Contributions
2020-21	Children, Education & Safeguarding	Oakleigh SEN			(45)	Budget Reprofile	Grant and Contributions
2020-21	Children, Education & Safeguarding	Whitefield School ASD			64	Budget Reprofile	Grant and Contributions
2020-21	Children, Education & Safeguarding	Queenswell Inf Sch, Northway Sch, Fairway Sch, Edgware Sch, Northgate Sch			(6)	Budget Reprofile	Grant and Contributions
2020-21	Children, Education & Safeguarding	Monkfrith			(9)	Budget Reprofile	Grant and Contributions
2020-21	Children, Education & Safeguarding	Early Education and Childcare place sufficiency			10	Budget Reprofile	CIL
2020-21	Children, Education & Safeguarding	Loft conversion and extension policy for Foster Carers			(109)	Budget Reprofile	Borrowing
2020-21	Children, Education & Safeguarding	Meadow Close Children's Homes			(326)	Budget Reprofile	Borrowing
2020-21	Children, Education & Safeguarding	Family Services Estate - building compliance, extensive R&M, H&S, DDA			(12)	Budget Reprofile	Capital Receipts
2020-21	Children, Education & Safeguarding	Placement Demand Transformation			(101)	Budget Reprofile	Borrowing
2020-21	Policy & Resources	Depot relocation			(71)	Budget Reprofile	CIL
2020-21	Policy & Resources	Asset Management			100	Budget Reprofile	Borrowing
2020-21	Policy & Resources	ICT strategy			(137)	Budget Reprofile	Capital Receipts
2020-21	Policy & Resources	Customer Services Transformation Programme			(44)	Budget Reprofile	Capital Receipts
2020-21	Policy & Resources	Implementation of Locality Strategy			(145)	Budget Reprofile	Capital Receipts
2020-21	Policy & Resources	Saracen Loan			(700)	Budget Reprofile	Borrowing
2020-21	Housing and Growth Committee	Office Build			(296)	Budget Reprofile	Borrowing
2020-21	Housing and Growth Committee	Empty Properties			(395)	Budget Reprofile	Capital Receipts
2020-21	Housing and Growth Committee	Hermitage Lane - mixed tenure residential conversion			(5,784)	Budget Reprofile	Borrowing

2020-21	Housing and Growth Committee	New Build Housing (Open Door)			(15)	Budget Reprofile	Borrowing
2020-21	Housing and Growth Committee	Housing acquisitions Open Door			4,725	Budget Reprofile	Borrowing
2020-21	Housing and Growth Committee	The Burroughs, Hendon			(989)	Budget Reprofile	Borrowing
2020-21	Housing and Growth Committee	Pinkham Way land release	(100)			Budget not required	Grant and Contributions
2020-21	Housing and Growth Committee	Micro site development for affordable housing			1,724	Budget Reprofile	S106
2020-21	Housing and Growth Committee	Mixed tenure housing programme (Tranche 1)			(160)	Budget Reprofile	S106
2020-21	Housing and Growth Committee	Development Portfolio			(263)	Budget Reprofile	Capital Receipts
2020-21	Housing and Growth Committee	ULF GF SAGE (142)			(1,954)	Budget Reprofile	Grant and Contributions
2020-21	Housing and Growth Committee	Town Centre			(364)	Budget Reprofile	CIL
2020-21	Housing and Growth Committee	Milespit Cemetery Works			(102)	Budget Reprofile	Borrowing
2020-21	Housing and Growth Committee	Colindale – Highways and Transport			(38)	Budget Reprofile	CIL
2020-21	Housing and Growth Committee	Grahame Park – Community Facilities			(167)	Budget Reprofile	S106
2020-21	Housing and Growth Committee	Barnet House Exit Works			(582)	Budget Reprofile	Borrowing
2020-21	Housing and Growth Committee	Health projects			(567)	Budget Reprofile	S106
2020-21	Environment	Local Implementation Plan 2016/17 and onwards			(14)	Budget Reprofile	Grant and Contributions
2020-21	Environment	Traffic Management			(4)	Budget Reprofile	S106
2020-21	Environment	Highways Improvement			(2,352)	Budget Reprofile	S106
2020-21	Environment	Travel Plan Implementation			(91)	Budget Reprofile	S106
2020-21	Environment	Minor Highways Improvements			(174)	Budget Reprofile	Borrowing
2020-21	Environment	Saracens - highways works			(40)	Budget Reprofile	S106
2020-21	Environment	Drainage Schemes			5	Budget Reprofile	Grant and Contributions
2020-21	Environment	Road Traffic Act - Controlled Parking Zones			(50)	Budget Reprofile	S106
2020-21	Environment	Investment in Roads & Pavement (NRP)			(1,495)	Budget Reprofile	Borrowing
2020-21	Environment	Highway Asset Management/Network Recovery Plan (NRP) Phase 2			(63)	Budget Reprofile	Borrowing
2020-21	Environment	Exor Asset Management System			(294)	Budget Reprofile	Borrowing
2020-21	Environment	Mill Corner Drainage Scheme			(1,000)	Budget Reprofile	Borrowing
2020-21	Housing and Growth Committee	Colindale – Parks, Open Spaces and Sports			(904)	Budget Reprofile	CIL
2020-21	Environment	Refurbish and regenerate Hendon Cemetery and Crematorium			(378)	Budget Reprofile	Borrowing
2020-21	Environment	Hendon Cemetery & Crematorium Enhancement			(10)	Budget Reprofile	Capital Receipts
2020-21	Environment	Lines and Signs			(9)	Budget Reprofile	Borrowing

2020-21	Environment	LED Lighting			(1,408)	Budget Reprofile	Borrowing
2020-21	Environment	Moving traffic cameras			(148)	Budget Reprofile	Borrowing
2020-21	Environment	Controlled parking zones review			(99)	Budget Reprofile	Borrowing
2020-21	Environment	Highways (permanent re-instatement)			(70)	Budget Reprofile	Borrowing
2020-21	Environment	Old Court House - public toilets			(40)	Budget Reprofile	S106
2020-21	Environment	Park Infrastructure			(31)	Budget Reprofile	Borrowing
2020-21	Environment	Victoria Park Infrastructure			(210)	Budget Reprofile	Capital Receipts
2020-21	Environment	Data Works Management system			(111)	Budget Reprofile	Capital Receipts
2020-21	Environment	Vehicles			(327)	Budget Reprofile	Borrowing
2020-21	Environment	COVID19 Social Distancing Projects			(538)	Budget Reprofile	Grant and Contributions
2020-21	Environment	Greenspaces Infrastructure Programme			(128)	Budget Reprofile	S106
2020-21	Environment	Green spaces development project			(65)	Budget Reprofile	Borrowing
2020-21	Adults and Safeguarding	Gaelic playing pitch relocation			(67)	Budget Reprofile	S106
2020-21	Brent Cross	BXC - Funding for land acquisition			(6,115)	Budget Reprofile	Borrowing
2020-21	Brent Cross	Thames Link Station			(9,813)	Budget Reprofile	Grant and Contributions
2020-21	Brent Cross	Critical Infrastructure			(12,519)	Budget Reprofile	Grant and Contributions
2020-21	Brent Cross	BXS Land Acquisitions			(1,172)	Budget Reprofile	Grant and Contributions
2020-21	Housing Revenue Account	Major Works (excl Granv Rd)			(1,241)	Budget Reprofile	RCCO/ Depr
2020-21	Housing Revenue Account	Accessible accommodation adaptations			7	Budget Reprofile	RCCO/ Depr
2020-21	Housing Revenue Account	Regeneration			47	Budget Reprofile	RCCO/ Depr
2020-21	Housing Revenue Account	Miscellaneous Repairs			746	Budget Reprofile	RCCO/ Depr
2020-21	Housing Revenue Account	M&E/ GAS			701	Budget Reprofile	RCCO/ Depr
2020-21	Housing Revenue Account	Voids and Lettings			(288)	Budget Reprofile	RCCO/ Depr
2020-21	Housing Revenue Account	New Build - 250 units			(23)	Budget Reprofile	Borrowing
2020-21	Housing Revenue Account	Extra Care - housing (Stag)			443	Budget Reprofile	Borrowing
2020-21	Housing Revenue Account	Extra Care - housing (Cheshir)			(2,458)	Budget Reprofile	Borrowing
2020-21	Housing Revenue Account	Burnt Oak Broadway Flats - additional storey			15	Budget Reprofile	Borrowing
2020-21	Housing Revenue Account	Regen Stock Additional Investment			(2,413)	Budget Reprofile	Borrowing
2020-21	Housing Revenue Account	Stag house - property purchase			(97)	Budget Reprofile	Borrowing
2020-21	Housing Revenue Account	Barnet Homes GLA development programme			(17)	Budget Reprofile	Borrowing
2020-21	Housing Revenue Account	HRA acquisitions			(1,709)	Budget Reprofile	Borrowing
2020-21	Housing Revenue Account	Silk House and Shoelands			(1,965)	Budget Reprofile	Capital Receipts
2020-21	Housing Revenue Account	HRA Fire Safety Programme			3,361	Budget Reprofile	RCCO/ Depr

2020-21	Children, Education & Safeguarding	Meadow Close Children's Homes		72		Budget Additions	Borrowing
2020-21	Housing and Growth Committee	Brent Cross Retail Park Purchase	(80)			Budget not required	Borrowing
2020-21	Children, Education & Safeguarding	Whitefield School ASD			(1)	Budget Reprofile	Grant and Contributions
2021-22	Housing and Growth Committee	Housing acquisitions Open Door		1,950		Budget Additions	Grant and Contributions
2021-22	Housing and Growth Committee	Housing acquisitions Open Door		3,225		Budget Additions	Borrowing
2021-22	Housing and Growth Committee	Public Sector Decarbonisation Scheme Phase 1		1,381		Budget Additions	Grant and Contributions
2021-22	Environment	Minor Highways Improvements		300		Budget Additions	Borrowing
2022-23	Environment	Minor Highways Improvements		307		Budget Additions	Borrowing
2023-24	Environment	Minor Highways Improvements		316		Budget Additions	Borrowing
2021-22	Housing and Growth Committee	Graham Park NE		1,468		Budget Additions	Borrowing
2021-22	Children, Education & Safeguarding	Modernisation - Primary & Secondary		3,586		Budget Additions	Grant and Contributions
2022-23	Brent Cross	Thames Link Station	2,500			Budget Virement	Grant and Contributions
2021-22	Brent Cross	BXC - Funding for land acquisition	(2,500)			Budget Virement	Grant and Contributions
2021-22	Brent Cross	Thames Link Station		3,594.35		Budget Additions	Grant and Contributions
2022-23	Brent Cross	Thames Link Station		399.00		Budget Additions	Grant and Contributions
2021-22	Brent Cross	Thames Link Station		70.00		Budget Additions	Grant and Contributions
2021-22	Housing and Growth Committee	Office Build	(1,188)			Budget not required	Borrowing
2021-22	Housing and Growth Committee	Colindale Future of Work Modifications		2,761		Budget Additions	Borrowing
2021-22	Housing and Growth Committee	Barnet House Exit Works	(1,573)			Budget not required	Borrowing
2020-21	Housing and Growth Committee	Estates REFIT Project		425		Budget Additions	Borrowing
2020-21	Housing and Growth Committee	Area Committees		465		Budget Additions	CIL
			(2,941)	20,319	(53,464)		

Appendix B (ii)

P&R Proposed Capital Programme by Theme

Theme Committee	2021-22	2022-23	2023-24	2024-25	Total	Grants	S106	Capital Receipts	RCCO/ Depr	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Adults and Safeguarding	5,814	4,404	4,130	2,974	17,321	12,439	417	90		3,997	379	17,322
Brent Cross	160,244	54,239	3,677		218,160	201,406		900			15,853	218,159
Children, Education & Safeguarding	27,934	13,164	180		41,279	38,723	2	342		406	1,805	41,279
Environment	27,063	8,192	8,060	6,383	49,699	686	4,095	408		7,868	36,640	49,699
Housing and Growth Committee	154,036	66,802	61,683	26,673	309,194	53,484	7,774	12,980	491	15,035	219,431	309,195
Policy & Resources	24,905	600	600	600	26,705	1		1,252		5,000	20,451	26,705
Total - General Fund	399,996	147,402	78,330	36,630	662,358	306,740	12,289	15,973	491	32,306	294,560	662,359
Housing Revenue Account	103,739	65,020	52,132	46,494	267,385	19,992		3,352	79,062		164,979	267,385
Total - all services	503,736	212,422	130,462	83,124	929,744	326,732	12,289	19,325	79,554	32,306	459,538	929,744

Adults and Safeguarding	2021-22	2022-23	2023-24	2024-25	Total	Grants	S106	Capital Receipts	RCCO/ Depr	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Sport and Physical Activities	540				2,090	450		90				540
Community Equipment and Assistive Technology	1,417	1,310	1,270		4,440					3,997		3,997
Gaelic playing pitch relocation	417				530		417					417
Disabled Facilities Grants Programme	3,060	3,094	2,860	2,974	14,113	11,988						11,988
Investing in IT	379				1,079		0				379	379
	5,814	4,404	4,130	2,974	22,251	12,439	417	90		3,997	379	17,322

Brent Cross	2021-22	2022-23	2023-24	2024-25	Total	Grants	S106	Capital Receipts	RCCO/ Depr	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
BXC - Funding for land acquisition	12,476	503			14,043						12,979	12,979
Thames Link Station	111,559	39,773			244,746	150,644					688	151,332
Critical Infrastructure	23,362	13,058			43,625	33,333		900			2,186	36,419
Strategic Infrastructure Fund												
BXS Land Acquisitions	12,847	905	3,677		26,988	17,429						17,429
	160,244	54,239	3,677		329,402	201,406		900			15,853	218,159

Children, Education & Safeguarding	2021-22	2022-23	2023-24	2024-25	Total	Grants	S106	Capital Receipts	RCC O/ Depr	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Modernisation - Primary & Secondary	6,018				6,018	6,018						6,018
Healthy Pupils Fund												
Orion Primary School												
Monkfrith	0				0	0						0
St Agnes	23				23	23						23
Saracens Primary	1,651	550			2,201	2,199	2					2,201
Kosher Kitchen	644				644	644						644
Permanent All Through Expansion Programme												
London Academy	11				11	11						11
St Mary's & St John's						0						0
Permanent Primary/Secondary(reallocation) Expansion Programme												
St James / Blessed Dominic	25				25	25						25
Permanent Secondary Expansion Programme												
Oak Lodge Special School											484	
Grammar school projects	4,287	700			4,987	4,503						4,987
SEN Programme												
Oakleigh SEN												
Whitefield School ASD	1,028	650			1,678	1,678						1,678
	1				1	1						1
Other Projects												
Queenswell Inf Sch, Northway, Fairway, Edgwar, Northga	110				110	110					0	110
School place planning (Primary)	786	842			1,628	1,628						1,628
School place planning (Secondary)	842	612			1,454	1,454						1,454
SEN	2,917	3,000			5,917	5,918						5,918
Alternative Provision	7,880	6,630			14,510	14,510						14,510
Early Education and Childcare place sufficiency	406				406					406		406
Information Management	(0)				(0)							
Loft conversion and extension policy for Foster Carers	289	180	180		649			39			610	649
New Park House Children's home											372	372
Meadow Close Children's Homes	372				372							372
Family Services Estate - building comp, exten R&M, H&S, DDA	516				516			303			213	516
Placement Demand Transformation	126				126						126	126
	27,934	13,164	180		41,279	38,723	2	342		406	1,805	41,279

Environment	2020-21	2021-22	2022-23	2023-24	2024-25	Total	Grants	S106	Capital Receipts	RCC O/ MRA	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Local Implementation Plan 2016/17 and onwards	1,256	14				14	15						15
Borough Cycling Programme	541	(0)				(0)							
HIGHWAYS non-TfL													
Traffic Management		4				4		4					4
Highways Improvement	162	2,352				2,352		2,239			113		2,352
Travel Plan Implementation		91				91		91					91
Exor Asset Management System	308	493	134	111	13	752					752		752
Saracens - highways works		40				40		40					40
Drainage Schemes	5	127				127	126				1		127
Mill Corner Drainage Scheme		1,000				1,000					1,000		1,000
Road Traffic Act - Controlled Parking Zones	58	50				50		49			0		50
Investment in Roads & Pavement (NRP)	5,518	1,496				1,496					1,496		1,496
Highway Asset Management/Network Recovery Plan (NRP) Phase 2	1,537	7,903	6,826	6,240	6,370	27,339					7,868	19,470	27,338
Refurbish and regenerate Hendon Cemetery and Crematorium	936	378				378					378		378
Hendon Cemetery & Crematorium Enhancement		10				10			10				10
Old Court House - public toilets		40				40		40					40
Park Infrastructure		1,589	134			1,723	8	315			1,400		1,723
Victoria Park Infrastructure	170	210				210			210				210
Data Works Management system	109	182				182			182				182
Parks Equipment	7	1				1			1				1
Vehicles	8,873	5,893	342	943		7,178			1		7,177		7,178
Green spaces development project	35	546				546					546		546
Lines and Signs		9				9					9		9
LED Lighting	4,382	1,408				1,408					1,408		1,408
Greenspaces Infrastructure Programme	72	468	399	450		1,317		1,317					1,317
Moving traffic cameras	2	390				390					390		390
Controlled parking zones review	1	449	50			499					499		499
Highways (permanent re-instatement)	525	908				908			4		903		908
COVID19 Social Distancing Projects	464	538				538	538						538
Minor Highways Improvements	420	474	307	316		1,097					1,097		1,097
	25,381	27,063	8,192	8,060	6,383	49,699	686	4,095	408		7,868	36,640	49,699

Housing and Growth Committee	2021-22	2022-23	2023-24	2024-25	Total	Grants	S106	Capital Receipts	RCCO/Depr	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Colindale – Parks, Open Spaces and Sports Office Build	2,900				2,900	333				2,567		2,900
Colindale Future of Work Modifications	2,761				2,761						2,761	2,761
Colindale – Highways and Transport	1,038	1,000	1,000	4,000	7,038	948	2,667			3,423		7,038
Health projects	567				567		567					567
Colindale Station Works	2,858				2,858		108				2,750	2,858
New Build Housing (Open Door)	13,265	1,200			14,465			4,339			10,125	14,465
Housing acquisitions Open Door	49,950	40,700	47,900	16,900	155,450	1,950					153,500	155,450
Loan Trf 156 properties to Open door												
ULF GF SAGE (142)	17,088	19,252	9,487	773	46,600	46,600						46,600
The Burroughs, Hendon	13,397				13,397						13,398	13,398
Grahame Park – Community Facilities	2,108				2,108		2,108					2,108
Town Centre	2,404	1,550	824		4,778	628	105			4,045		4,778
Development pipeline												
Strategic opportunities fund	24,697				24,697						24,697	24,697
Milespit Cemetery Works	1,482				1,482						1,482	1,482
Empty Properties	2,071	1,700			3,771			3,771				3,771
Direct Acquisitions												
Modular Homes			2,472		2,472						2,472	2,472
St Georges Lodge temporary accommodation conversion	250				250						250	250
Hermitage Lane - mixed tenure residential conversion	5,784				5,784				491		5,292	5,784
Pinkham Way land release												
Micro site development for affordable housing	2,587				2,587	1,644	943					2,587
Decent Homes Programme												
Graham Park NE	1,468				1,468						1,468	1,468
Infrastructure Projects				5,000	5,000					5,000		5,000
DECC - Fuel Poverty												
Mixed tenure housing programme (Tranche 1)	1,277				1,277		1,277					1,277
Barnet House Exit Works												
Development Portfolio	3,470	1,400			4,870			4,870				4,870
Firestopping works and other urgent maintenance works at care homes	717				717						717	717
Window replacement at Aphthore care centre	520				520						520	520
Estates REFIT Project												
Brent Cross Retail Park Purchase	(1)				(1)						(1)	(1)
Public Sector Decarbonisation Scheme Phase 1	1,381				1,381	1,381						1,381
	154,136	66,802	61,683	26,673	309,194	53,584	7,774	12,980	491	15,035	219,431	309,295

Policy & Resources	2021-22	2022-23	2023-24	2024-25	Total	Grants	S106	Capital Receipts	RCCO/Depr	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Depot relocation Community Centre - Tarling Road	5,071				5,071			71		5,000		5,071
Finance IT Asset Management	742	600	600	600	2,542			54			2,487	2,542
Estate 5 years Asset Management Fund ICT strategy	802				802			802		0		802
Customer Services Transformation Programme Implementation of Locality Strategy	181				181			181				181
	145				145			145				145
Area Committee Saracen Loan	17,964				17,964						17,964	17,964
	24,905	600	600	600	26,705	1	-	1,252		5,000	20,451	26,705

Housing Revenue Account	2021-22	2022-23	2023-24	2024-25	Total	Grants	S106	Capital Receipts	RCCO/Depr	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Major Works (excl Granv Rd)	9,455	8,505	7,062	8,444	33,466				33,466			33,466
Accessible accommodation adaptations	678	460			1,138				1,138			1,138
Regeneration	484	644	274	217	1,619				1,619			1,619
Miscellaneous Repairs	1,994				1,994				1,994			1,994
M&E/ GAS	2,899	2,940	2,440	3,140	11,419				11,419			11,419
Voids and Lettings	4,243	3,655	3,505	3,555	14,958				14,958			14,958
New Build - 250 units	8,637	10,962	29,569	31,138	80,306						80,306	80,306
Ansell Court - extra care housing Dollis Valley - property acquisitions	3,700				3,700			1,110			2,590	3,700
Extra Care - housing (Stag)	9,956	6,153	4,982		21,091	7,197					13,894	21,091
Extra Care - housing (Cheshir)	6,060	4,081	1,860		12,001	1,581					10,420	12,001
Burnt Oak Broadway Flats - additional storey	3,237	2,454			5,691	2,514					3,177	5,691
Upper & Lower Fosters Community Led Design	0				0							0
Regen Stock Additional Investment	22,785	8,167			30,951						30,951	30,951
Stag house - property purchase	97				97			32			65	97
Barnet Homes GLA development programme	12,765	13,000	1,124		26,889	8,700					18,188	26,888
HRA acquisitions	5,387				5,387						5,387	5,387
Silk House and Shoelands	1,965				1,965			1,965				1,965
HRA Fire Safety Programme	9,153	4,000	1,315		14,468				14,467			14,467
HRA Fire and Structural repairs	(0)				(0)						(0)	(0)
Dollis Valley CPO Payment	245				245			245				245
	103,739	65,020	52,132	46,494	267,385	19,992		3,352	79,062		164,979	267,385

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Appendix C - HRA Business Plan – May 2021

1. Introduction

The council's Housing Revenue Account (HRA) is funded through rents and service charges received from council tenants and leaseholders, it meets the costs associated with maintaining and managing the council's housing stock and can also be used for funding the development or acquisition of new council homes and other related capital projects.

Since 2012, the HRA has been self-financing, although there have been restrictions on both the amount the HRA can borrow and the rents that can be charged.

The government removed the borrowing cap in October 2018 and borrowing in the HRA is now subject to the similar prudential guidelines as the General Fund, providing opportunities for increasing affordable housing supply supported by the HRA.

Recent changes in Right to Buy receipts has meant that receipts now have 5 years to be utilised for the provision of replacement homes, rather than the 3 years in the past and the amount that can be used has increased from 30% to 40% of the development spend.

The HRA Business Plan has been updated with support from housing consultants Savills and in partnership with Barnet Homes.

2. Executive Summary

Good progress has been made since 2015 on delivering the HRA business plan. Headlines include; the completion of 43 new council homes for rent, a 53-unit extra care housing scheme at Ansell Court in Mill Hill and the acquisition of 93 properties in London to let at affordable rents to homeless applicants. Grant has been secured from the Greater London Authority under the Building Council Homes for Londoners Programme to support the building of 87 new council homes in Barnet, the 18 new homes as part of the top hatting scheme at Burnt Oak Broadway and for the HRA 250 home programme which includes a scheme at The Grange estate in East Finchley.

The council and Barnet Homes have always taken fire safety very seriously and ensuring the safety of residents was already a top priority for our investment programme. Following the Grenfell Tower fire in 2017, the council has committed to going beyond its statutory obligations to meet best practise in fire safety measures, and a priority for the HRA business plan going forward will be to deliver this commitment through an investment programme totalling £51.9m, of which £34m has been spent to the end of March 2021.

The council has continued to invest in existing council homes which continue to be maintained to the Decent Homes standard.

Other projects to be supported by the HRA Business Plan include two additional extra care schemes, providing 125 new homes.

This updated plan identifies provision for building a further 250 new homes for rent in the borough, and investment of £36 million in properties that continue to be occupied on our regeneration estates at Grahame Park and Dollis Valley. Savills was commissioned to carry out a stock condition survey; which included estimating costs to achieve EPC C targets by 2030 and also the Government Clean Growth Strategy.

The current year plan has also made provision for £13.4m of new spend for environmental works to shared and communal spaces as well as an initial £27m towards achieving carbon neutrality across the stock by 2050. The estimated costs for achieving carbon neutral by 2050 is estimated by Savills to be significantly higher than this £27m; but there are still significant unknowns as to what technology options there will be available to assist, as well as what grant funding there will be from Government.

3. National Policy Framework

From 2012 HRAs became self- financing with a restriction placed on their external borrowing. In October 2018, the government removed the debt cap and HRA borrowing is now subject to the similar prudential borrowing guidelines as the General Fund. The removal of the borrowing cap means that council has an opportunity to invest more in increasing the supply of affordable housing, but it needs to ensure it can meet the cost of the borrowing.

The Welfare Reform and Work Act 2016 introduced a 4-year requirement for social landlords to reduce their rents by 1% each year from April 2016. This requirement reduced the revenue available to the HRA. In October 2017, the government announced that it intends to allow registered providers and local authorities to increase rents by the Consumer Price Index (CPI) plus 1% for at least five years from April 2020. The Business Plan assumes that rents will increase by the allowable amount until 2025 and then at CPI from 2025.

The roll out of Universal Credit for new applicants and where there is a change in circumstances for existing claims is now underway in Barnet. The impact of this on rent collection and associated bad debt is being closely monitored.

Corporate Priorities

The Barnet Plan 2021-2025 sets out the council's vision to make Barnet a great place to live work and visit. It focusses on four priorities over the next 4 years to realise this vision:

- Clean, safe and well run: A place where our streets are clean and anti-social behaviour is deal with so residents feel safe. Providing good quality, customer friendly services in all that we do

- Family friendly: Creating a Family Friendly Barnet, enabling opportunities for our children and young people to achieve their best
- Healthy: A place with fantastic facilities for all ages, enabling people to live happy and healthy lives
- Thriving: A place fit for the future, where all residents, businesses and visitors benefit from improved sustainable infrastructure & opportunity.

In April 2019 the council agreed a new Housing Strategy which sets out the plans to meet housing need in the borough with a focus on the following priorities:

- Raising standards in the private rented sector
- Delivering more homes that people can afford
- Safe and Secure Homes
- Promoting independence
- Tackling homelessness and rough sleeping in Barnet

The HRA Business Plan complements the Housing Strategy in a number of ways, including:

- Maintaining the quality and safety of the existing supply of council housing
- Investing in the delivery of new affordable homes for rent
- Increasing the supply of housing to help tackle homelessness
- Investing in new homes for vulnerable people, including wheelchair users and older people
- Ensuring that housing services funded through the HRA are efficient and effective.

4. Maintaining the quality and safety of the existing supply of council housing

The council's housing stock is managed and maintained by Barnet Homes, an Arm's Length Management Organisation (ALMO) which was established in 2004 to improve services and deliver a programme of investment to bring the stock up to the Decent Homes standard.

Barnet Homes completed the Decent Homes programme in 2011, and now has a 30-year asset management strategy in place to deliver the following objectives:

- Ensure properties are maintained in a manner which provides a safe living environment and one that is not detrimental to residents and others health.
- Ensure operators maintaining the buildings can carry out work in a safe manner and without detriment to health.
- Identify the assets to be maintained
- Establish the basis for future investment in the assets
- Establish a basis for possible alternative use of the assets

- Provide an outline vision for new build dwellings
- Establish a mechanism for review of the strategy
- Seek residents' views on the objectives of the strategy to inform the development and updating of the strategy
- Achieve value for money
- Recognise legislation regarding the Government targets of Carbon Neutrality by 2050
- Inform the 30-year HRA business plan

To ensure that our investment plans going forward are based on a robust and accurate assessment of the stock, Barnet Homes commissioned a stock condition survey of 20% of the housing stock internally and 100% externally, the results of which identified an additional £75m of spend required for the stock over a 30-year period when compared to the prior year business plan. The business plan also makes provision for further stock condition surveys to be carried out in future years to ensure 100% coverage of all stock and the most efficient use of capital programme resources.

Building and Fire safety

Following the Grenfell Tower disaster in June 2017, the council has responded by developing a £51.9 million investment programme to improve fire safety in its housing stock, including the replacement of Aluminium Composite Material (ACM) on blocks at Granville Road (completed 2018), and the installation of sprinklers in high rise blocks. £34m of this investment programme has been spent to date.

'Building a Safer Future' is a government-led initiative in response to the Grenfell Tower tragedy. It is a framework within which the shortcomings identified in the post-Grenfell review of Building Regulation and Fire Safety can be addressed. These shortcomings include the way high-rise residential buildings are built and managed. BSF is also intended to deal with situations where residents may raise concerns about the safety of their buildings, which they may feel are not taken seriously by their landlord.

Two key pieces of legislation support this initiative – the Building Safety Bill and the Fire Safety Bill, both of which are expected to receive Royal Assent in the second half of 2021. The new Building Safety Regulator, working under the responsibility of the Health and Safety Executive and with responsibility for 'high risk' / 'in-scope' buildings (e.g. residential blocks over 18 metres, but other criteria may be defined through subsequent statutory instruments) is unlikely to be fully operational until 2023/24.

Following the consultation and formal introduction of the Bills it is inevitable that there will be additional requirements for other enhanced aspects of building and fire safety and ongoing management of our buildings and the wider housing stock within the borough. An additional £0.75m per annum has therefore been included as revenue

expenditure within the plan to deliver the requirements of ‘Building a Safer future’ and associated legislation.

Estate Regeneration

The council recognises that its ambitious programme to regenerate its four largest council estates has taken much longer to deliver than originally envisaged. In view of this, significant investment is required by the council in properties at **Grahame Park** over the next 3 years. The council will ensure that homes at Grahame Park programmed to be occupied until 2024 remain compliant with statutory landlord obligations. Properties due to remain occupied beyond 2024 will be improved to meet the Decent Homes standard. These works are summarised below:

Table 1 – Approach to investment in homes at Grahame Park Estate	
Homes to continue in occupation to 2024	Compliance works, Electrical Rising Main, Electrical Testing and Rewires, Fire enhancement works, partial window replacements, ASB works such as external perimeter lighting, entry phones/renewal of entrance doors and Housing Health and Safety Rating System works.
Homes to continue in occupation beyond 2024	As above and including repair/renewal of bathrooms and kitchens, roof and windows replacement.

The council is exploring with Barnet Homes options for accelerating the regeneration in the North of Grahame Park supported subject to viability by the Housing Revenue Account. It is hoped that this will be the subject of a report to the June Housing & Growth Committee.

Significant regeneration has taken place at Dollis Valley. The remaining council homes at **Dollis Valley** were due to be vacated between 2022 and 2025. Discussions are taking place between the Council/Re and the developers, with the possibility that all phases will now have a vacant possession date of 2025. These properties were built using the large panel system (LPS) method and in view of recent concerns raised about this type of construction and following discussions with Cadent Gas, Barnet Homes have replaced the gas fuel heating and hot water systems to homes in blocks of 5 storey and above with all-electric systems. Subsequently, piped gas systems have been disconnected. As running costs associated with the electric systems will be higher than gas, the council will need to compensate residents for any additional cost and adequate provision has been made in the plan for this.

The following table shows the total investment plans for the council's housing stock through to 2026 (at current values, no inflation):

Financial £'000	Year	2021.22	2022.23	2023.24	2024.25	2025.26	Total
STOCK CAPITAL INVESTMENT							
Major Works		£13,942	£15,517	£15,517	£15,517	£20,713	£94,676
M&E/ GAS		£4,400	£4,400	£4,400	£4,400	£ -	£22,000
Adaptations (voids)		£685	£2,000	£1,624	£1,200	£1,200	£7,200
Fire safety programme		£12,514	£4,000	£1,315	£ -	£ -	£33,479
Additional Regeneration		£21,069	£8,545	£110	£110	£ -	£35,670
Neighbourhood works		£ -	£2,230	£2,230	£2,231	£1,338	£8,029
Carbon Neutral works		£ -	£667	£667	£666	£1,000	£3,000
Totals		£52,610	£37,359	£25,863	£24,124	£24,251	£ 204,054

5. Investment in the delivery of new affordable homes for rent

New Build Programme

The council's Housing Strategy 2019-2024 sets out the need for more affordable homes in the borough. In order to deliver on this, local authority land, including land held in the HRA, can be made available to provide sites for new housing, either at affordable rent or for low cost home ownership.

Barnet Homes completed the first tranche of 43 new council homes by Summer 2016 and in Autumn 2018 a GLA grant of £8.7m was secured for a further 87 new homes. Plans for the delivery of these properties are progressing.

Barnet Homes have established a Registered Provider (RP), Opendoor Homes, which is delivering 341 new affordable homes for rent on council land, primarily in the HRA. 161 of these have been completed and are now occupied.

This approach means that whilst the HRA supports the developments by providing land at nil cost, the development costs of the new homes are funded by a loan to Opendoor Homes from the council. The council retains 100% nomination rights to the properties that are built. Additionally, Opendoor Homes is delivering a policy compliant mixed tenure scheme at Hermitage Lane which will produce a further 21 affordable homes.

Further work has been carried out on the capacity of HRA sites to deliver additional homes, and several sites have been identified which are expected to provide

approximately 250 new council homes for affordable rent over the next five years. Work has commenced on consulting on the first scheme of this programme in respect of around 100 homes potentially at The Grange.

The council will continue to work with Opendoor Homes, with a focus on mixed tenure developments outside of the HRA. However, the council will consider transferring HRA land to the RP where there is a good case for doing so, for example where the HRA does not have the capacity to fund a development or where it is more suitable for mixed tenure scheme.

Acquisitions Programme

To make effective use of the council's Right- to-Buy receipts, HRA funding has already been used to support the purchase 93 properties across London which have been let at affordable rents via the council's Housing Allocations Scheme.

The council's Housing Strategy has identified the need to maintain a supply of larger affordable units and will ensure that some of the units acquired units have three or more bedrooms.

Recent changes to the use of Right to Buy Receipts has placed a greater emphasis on new build supply and as such it is less likely that this money will be available to support future acquisitions programmes.

6. Increasing the supply of housing to help tackle homelessness

The delivery of new affordable homes for rent, as described above, will help to reduce homelessness by providing an alternative to expensive temporary accommodation and offer households in this position a better outcome.

At present the average net annual cost of providing temporary accommodation is £3,400 per household, and this cost is set to increase due to continuing inflationary pressures in the housing market associated with population growth and a limited supply of housing.

This means that for every 100-additional new affordable homes built or acquired, the council will save at least £0.340m in temporary accommodation costs within in the General Fund.

7. Investment in new homes for vulnerable people

The council has identified a need for additional extra care housing for older people and homes for wheelchair users. As a result, investment is being targeted in two particular areas set out below.

Extra Care housing

As well as providing better outcomes for users, additional supported housing will provide a more cost-effective alternative to expensive residential care. It is estimated that around 35% of people admitted to residential accommodation by the council would have a better quality of life if there was availability within extra care housing. This equates to approximately 90 households every year.

Each client placed in extra care housing provides a saving of £10,000 a year compared to the cost of residential care. The first extra care scheme completed during 2019 at the 53-home extra care sheltered housing scheme at Ansell Court.

The council and Barnet Homes are progressing well with the next 51 home extra care scheme at Stag House in Burnt Oak and another 75-home scheme as part of community led development plans for the Upper and Lower Fosters estate in Hendon which started on site in March 2021. Both schemes will be funded through the HRA and with grant from the GLA.

Wheelchair housing

The council has identified a number of people currently in residential care, who would benefit from wheelchair adapted housing. It is estimated that for each person rehoused a saving of up to £50,000 will be generated in the General Fund. Barnet Homes has already built 29 wheelchair adapted homes as part of the 40 new council homes completed in 2016. Additional wheelchair adapted homes will be provided as part of the on-going programme of building affordable homes described in section six above. This complies with the local plan requirement that at least 10% of new homes should be wheelchair accessible or easily adapted for wheelchair users.

8. Efficient and Effective Services

The majority of services funded from the HRA are provided by the council's ALMO, Barnet Homes, including the management and maintenance of council housing and the provision of housing needs service. which is responsible for the assessment of eligibility for rehousing against the council's Housing Allocations Scheme.

During 2015, the council reviewed the services provided by Barnet Homes through a series of challenge sessions to ensure that the services were of a satisfactory standard and provided good value for money. This led to the development of a new ten-year management agreement, effective from 1st April 2016 and secured savings worth £2.15m over the first five years of the agreement. This sum is equivalent to a 10% budget reduction and has had minimal impact on the effectiveness of services, whilst freeing up HRA resources for investment in further new homes.

9. Right to Buy Receipts

The Right-to-Buy scheme was reinvigorated in 2012 through the introduction of more generous discounts for tenants wishing to buy their council property. As part of this, local authorities have been permitted to keep a larger proportion of the receipts generated from Right-to-Buy sales on condition that these are spent on providing new affordable homes within 3 years. The council has so far made use of Right-to-Buy receipts to support the building and acquisitions programme described in section six above, including 44 newly built council homes and 20 homes acquired on the open market for affordable rent. A recent announcement by MHCLG regarding Right to Buy receipts has meant that receipts now have 5 years to be utilised for the provision of replacement homes, rather than the 3 years in the past and the amount that can be used has increased from 30% to 40% of the development spend.

10. HRA 30 Year Business Plan

The council uses a spreadsheet model provided by Savills to project the HRA position over a 30 -year period, considering changes in stock, capital programme requirements, and anticipated policy changes.

A baseline position, shown in Appendix A has been established which takes account of the current capital programme, the loss of stock expected through estate regeneration and sales, and the latest government advice on rent setting. The baseline capital programme also includes: an agreed £52m investment in fire safety, £35.7m of investment in homes at Dollis Valley and Grahame Park, building of 337 new homes supported by the GLA grant and the acquisition of 51 properties for affordable rent.

Following a review of the HRA depreciation methodology by Savills; the methodology has been amended to follow best practice guidance. The historical methodology was that all assets were depreciated over a 50-year period, indicating that Council believed the assets would only be income generating for a maximum 50 years, despite RTB leases being signed for well in excess of 50 years. The impact has been to reduce the depreciation charge by approximately £10m per annum. Whilst this does affect the annual surplus, it has no impact on the levels of borrowings as depreciation is not a cash item.

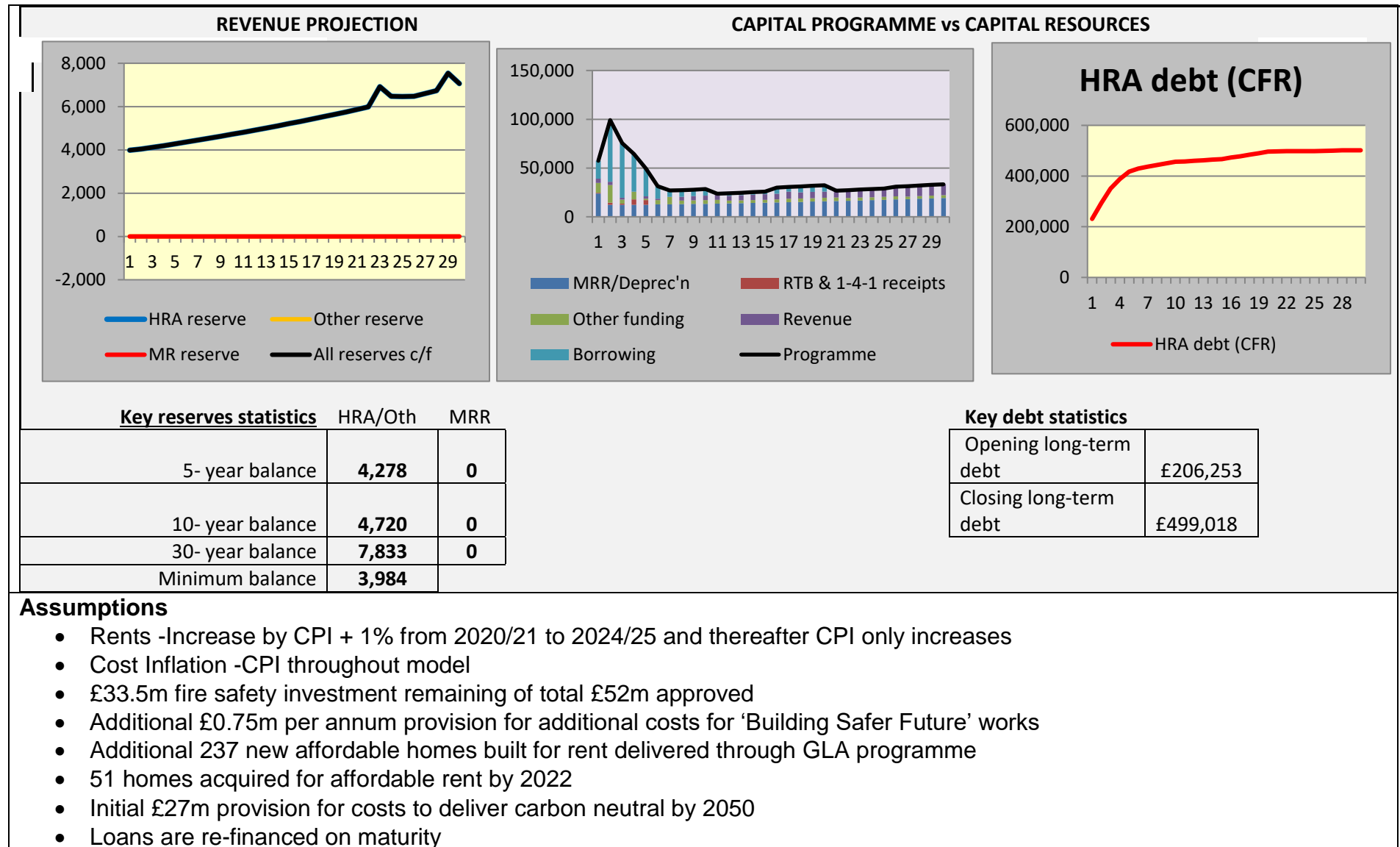
Savills has also recommended increasing the Minimum Revenue Reserve from the current £3m to £4m and this has been implemented from the 2021/22 financial year.

It is recommended that the council proceeds with developing plans for implementing the programme described above. This will see an increase in borrowing from £206m currently to £502m. This increase in borrowings means that the primary sensitivity to the business plan is interest rates. Officers are reviewing options regarding 'forward

funding' loan drawdowns to 'lock in' interest rates and mitigates this sensitivity, within the overall treasury strategy.

A summary of the proposed Capital programme is included at Appendix B and the draft HRA budget for 2021/22 is included at Appendix C.

Appendix A - HRA Business Plan – Baseline Model



Base position shows sustainable HRA over 30-year life of the business plan

Appendix B- Proposed HRA Capital Programme to 2026

Financial Year £'000	2021.22	2022.23	2023.24	2024.25	2025.26	Total
STOCK CAPITAL INVESTMENT						
Major Works	£13,942	£15,517	£15,517	£15,517	£20,713	£94,676
M&E/ GAS	£4,400	£4,400	£4,400	£4,400	£ -	£22,000
Adaptations (voids)	£685	£2,000	£1,624	£1,200	£1,200	£7,200
Fire safety programme	£12,514	£4,000	£1,315	£ -	£ -	£33,479
Additional Regeneration	£21,069	£8,545	£110	£110	£ -	£35,670
Neighbourhood works	£ -	£2,230	£2,230	£2,231	£1,338	£8,029
Carbon Neutral works	£ -	£667	£667	£666	£1,000	£3,000
Total Investment in Stock	£ 52,610	£ 37,359	£ 25,863	£ 24,124	£ 24,251	£ 204,054
INVESTMENT IN NEW SUPPLY						
Cheshire House – Extra Care	£ 8,204	£ 6,153	£ 4,982	£ -	£ -	£ 19,339
Stag House – Extra Care	£ 5,798	£ 4,081	£ 1,860	£ -	£ -	£ 14,628
Burnt Oak Broadway	£ 3,320	£ 2,386	£ -	£ -	£ -	£ 5,806
GLA Funded Programme	£ 12,738	£ 13,000	£ 1,134	£ -	£ -	£ 27,472
51 Acquisitions for affordable rent	£ 3,678	£ -	£ -	£ -	£ -	£ 16,178
New Build - 250 units*	£ 8,613	£ 11,597	£ 29,375	£ 23,920	£ 5,031	£ 79,086
Upper Lower Fosters	£ -	£ -	£ -	£ -	£ -	£ 850
Dollis Valley Shared Equity	£ 3,945	£ -	£ -	£ -	£ -	£ 3,945
Total Investment in New Supply	£ 46,296	£ 37,217	£ 37,351	£ 23,920	£ 5,031	£ 167,304
Total Capital Programme	£ 98,906	£ 74,576	£ 63,214	£ 48,044	£ 29,282	£ 371,358

*Subject to capital bids

Appendix C –HRA P11 Forecast 2020/21 and Business Plan 2021/22 to 2025/26

HOUSING REVENUE ACCOUNT	2020/21 Forecast £'000	2021/22 Budget £'000	2022/23 Budget £'000	2023/24 Budget £'000	2024/25 Budget £'000	2025/26 Budget £'000
Income						
Dwelling rents	(49,647)	(49,813)	(50,455)	(51,314)	(53,767)	(54,627)
Non-dwelling rents	(896)	(759)	(696)	(652)	(638)	(651)
Tenants Charges for services and facilities	(3,559)	(3,519)	(3,543)	(3,593)	(3,711)	(3,875)
Leaseholder Charges for services and facilities	(2,900)	(2,915)	(2,967)	(3,023)	(3,083)	(3,145)
Other Income	(964)	(200)	-	-	-	-
General Provision	4,999	-	-	-	-	-
Total Income	(52,967)	(57,206)	(57,661)	(58,582)	(61,199)	(62,298)
Expenditure						
Repairs and Maintenance	7,716	7,869	7,959	8,070	8,233	8,473
'Building Safer Future' funding	-	850	866	883	901	919
General	21,474	21,810	22,039	22,414	22,911	23,528
Special	2,159	2,457	2,298	3,328	2,080	2,123
Depreciation and impairment of fixed assets	12,421	12,220	12,243	12,254	12,373	12,700
Debt Management Expenses	7,595	8,854	9,311	10,380	11,160	11,874
Revenue Contribution to Capital	4,386	2,042	1,550	-	2,311	1,615
Increase in bad debt provision	748	1,070	1,363	1,241	1,139	1,024
Total Expenditure	56,499	57,172	57,629	58,570	61,108	62,256
Net Cost/(Income) of HRA Services	3,532	(34)	(32)	(12)	(91)	(42)
Interest and investment income	(80)	(11)	(40)	(41)	(41)	(43)
(Surplus) or deficit	3,452	(45)	(72)	(29)	(132)	(85)
Accumulated Reserve (Surplus)	(3,975)	(4,020)	(4,092)	(4,121)	(4,253)	(4,338)

Q4 2020/21 Corporate Risk Register

Risk ID	Risk Title	Risk Description	Risk Owner Job Title	Primary Risk Category	Corporate Plan Theme	Controls and Mitigations in Place	Residual Risk			Response Option	Previous quarter risk score	Direction of Travel (from previous quarter)	Q4 2020/21 Review Summary
							Impact	Likelihood	Risk Score				
Strategic Risks													
STR23	Economic downturn	The economic downturn could lead to business failure (particularly in retail, hospitality and leisure industries) and high local unemployment resulting in financial pressure on residents; increased demand for council services such as temporary accommodation and the long-term economic and societal health of the borough.	Director for Growth	Finance	Thriving	1. Discretionary business support grants application process in place 2. Business rate relief 3. Suspension of commercial rents on council owned properties 4. Extension of boost and BELS funding to March 2022.	5	4	20	Treat	20	Same	The second phase of the Discover Barnet campaign is still ongoing, alongside a wider programme to support town centre investment and reinvention. Since the council launched its "work and help" portal in November 2020, wider work is now commencing on a new programme to support all residents in Barnet on employment matters relating to Covid-19. This is to be launched in spring 2021, including developing new pathways into growth sectors such as health and care, construction and education. A co-ordinated communications plan to support the post Covid-19 recovery is also being rolled out.
STR03	Funding uncertainty due to economic downturn	A downturn in the economy could lead to financial pressures due to a large proportion of council funding coming from council tax and business rates income resulting in a reduction in service quality; non-delivery of the MTFs; and use of reserves.	Director of Resources	Finance	Clean, Safe & Well Run	1. Strategically move the funding base of the council from being supported by Government Grants to the more stable base of Council Tax income 2. Analysis of monthly collection performance; analysis of Housing Benefit and Council Tax Support awards and claims to provide early warning signs of pressures 3. Maintaining a specified level of balance within the council's resilience reserve in addition to appropriate contingency balances to mitigate any in year pressures; 4. Undertake forward planning, regularly updating budget assumptions and monitoring the Government's fiscal announcements. However, also maintain flexibility within existing plans to stem expenditure in non-frontline services whilst long term plans are being put into place; maintain good contacts with Government to remain as informed as possible.	4	4	16	Treat	16	Same	Finance Officers continue to monitor the risk around current council income streams and possible national policy changes affecting them in the future. Any concerns will be reported to the Council Management Team and Policy & Resources Committee and are planned via the usual budget and MTFs planning cycles.
STR16	Environmental sustainability	An inability to adequately manage the environmental impact of residents and business activities (such as air quality, resource management and climate change) could lead to negative long-term consequences to the local environment resulting in statutory environmental duties and targets not being met; financial consequences; and not protecting the environment for future generations.	Executive Director Environment	Statutory Duty	Clean Safe & Well Run	- Delivering air quality action plan - Rolling out electric vehicle charging points - Developing a reduction and recycling plan - Planting trees on highways - Delivery of the long term transport strategy - Developing Barnet's first sustainability strategy.	4	4	16	Treat	16	Same	The council has continued to develop Barnet's first Sustainability Strategy and will continue to engage with cross-council officer working groups and members prior to taking a draft strategy to Policy and Resources Committee later in the year. Services are continuing to prepare for the introduction of the Ultra-Low Emissions Zone, including assessing the impact on staff travel. Conversations are continuing with TfL regarding the delivery plan for the Long-Term Transport Strategy.
STR06	Adults safeguarding	If council services and partners do not effectively manage their relevant safeguarding risks, this could lead to a safeguarding incident resulting in potential harm to individuals and/or families, potential legal challenge, resident dissatisfaction and public scrutiny.	Executive Director Adults and Health	Statutory Duty	Healthy	- Barnet council and partners have signed up to the multi-London agency procedures safeguarding policies and procedures and adopted across London in Q1 19/20. These have been updated in Q1 20/21, and represent best practice. - The council has a comprehensive Learning and Development programme for social care practitioners to support high quality safeguarding practice. - A quality assurance framework is in place which includes independent case audit programme, supervision audits and direct observations of staff and self-audits to provide reassurance that practice quality is high and identify areas for improvement. - A quality board meets monthly to review the findings from mechanism in the quality assurance framework and track any improvement actions agreed. - Performance monitoring of safeguarding, happens monthly and quarterly by management team and performance team of Barnet safeguarding adults board. - Monthly reporting to executive director along with ad hoc reporting when necessary with clear roles and responsibilities are in place. - Implementation of the MASH from June 2019 - Professional lead for safeguarding and clear responsibilities for those carrying out safeguarding inquiries through line management and Safeguarding Adults Manager (SAM).	4	3	12	Tolerate	12	Same	The council takes safeguarding very seriously and has a programme of work underway to consolidate and strengthen the quality of practice. Work has continued to embed the MASH, and attendance at virtual multi-disciplinary meetings has improved. Staff are still working to ensure that effective links between departments/organisations are maintained during this period. The risk is being tolerated at a 12, with the existing controls and mitigations in place.
STR11	Prevention and managing demand	If capacity in the market (private or voluntary) falls this could lead to an unmanageable demand for Adult Social Care services within the current envelope (staffing/financial resources) resulting in a failure to meet statutory duties and additional pressure on staffing and finances.	Executive Director Adults and Health	Statutory Duty	Healthy	- For all contracted services due diligence is undertaken at the start of each contract to ensure quality and sustainability of providers. - Regular contract monitoring is undertaken with providers, with more visits to higher risk providers. There is also a clear provider failure/closure approach to manage closure of homes and safe transition of service users if required. More streamline and better focus on quality. - Working across North Central London to share ideas/learning on quality improvement programmes, including collaborative work with Enfield, Haringey, Camden and Islington councils on residential and nursing care supply, commissioning and quality assurance. - Ongoing work to monitor the sustainability of the sector and explore best use of council resources to support this (including the awarding of inflationary uplifts) - Specific support offer in place to support providers with Covid-19, including additional Covid-19 funding to support care providers to remain sustainable through the Covid-19 pandemic.	4	3	12	Treat	12	Same	Covid-19 continues to have a significant impact on the care market with particular impact on the care home sector due to increased deaths, a decrease in demand for care home beds and a number of Covid-19 outbreaks to manage. Vacancy levels are significant in care homes, which means there is a greater risk to the financial sustainability of care providers in the borough. The council continues to work with providers to support their financial sustainability through this difficult period, including through the management of various Covid-related grants.
STR12	Relationship with healthcare providers and partner organisations	Ineffective relationships with healthcare providers and partner organisations such as the NHS could lead to an inability to manage demand resulting in a failure to meet statutory duties and safeguarding of vulnerable residents.	Executive Director Adults and Health	Statutory Duty	Healthy	- Joint planning and co-ordination work takes place through the Joint Health and Wellbeing Strategy and other Health and Wellbeing Board work, and at North Central London level through the Integrated Care System. - At the borough level, there is close working through the integrated care partnership, the joint commissioning unit, the health and wellbeing executive group and the A&E delivery board which actively manage plans to control demand pressures in the system. - ASC operational managers work with the NHS on the daily basis, to manage demand and pressures. - Active monitoring of referral and activity data and discussing any concerns with health partners. - Working as an integral part of the integrated discharge team and closely monitoring discharge data.	4	3	12	Treat	12	Same	The Covid-19 pandemic has significantly changed how the council works with the local health partners in Barnet and across North Central London (NCL). Relationships have strengthened and the Integrated Discharge Team has continued (having now supported thousands of safe and timely discharges) along with a new support offer for care homes. The local Integrated Care Partnership has agreed some initial priorities to be working on collectively. Work is ongoing with health partners to implement the new arrangements for discharge and continuing healthcare.
STR05	Resilience management	Insufficient resilience management (e.g. Business Continuity, Emergency Planning, H&S) could lead to the council being unable to respond effectively to an emergency or incident resulting in disruption to services; harm to staff or the public; and legal challenge.	Director of Assurance	Business Continuity	Clean Safe & Well Run	- Current BC arrangements including strategy, exercises, training and resources - Corporate BC Strategy and Plan in place - Maintenance of BC lead network - Identification of P1 staff and relocation venues across the councils sites - Corporate Health and Safety Management system in place: Health and Safety Policy, risk assessment and review, training, monitoring and reporting performance.	4	3	12	Treat	12	Same	The Emergency Planning team remain reasonably staffed given the ongoing resource requirement to Covid-19, supported by a Graduate and secondments to the BECC. Emergency Responder levels remain sufficient to provide a minimum level of resilience. New staff are now on shift, but have not been tested in a scenario. Emergency Response plans and Service business continuity plans continue to be reviewed in light of the increase in remote working and less reliance on a main office, along with the threat of cyber attacks. Borough Resilience Forum (BRF) BAU meetings have resumed in addition to Gold/Covid BRF meetings.

STR14	Perception of safety	An increase in knife crime in London, hate crime and fake news could lead to a reduction in residents' perceptions of safety in the wider community resulting in an increase in community tension and demand for services.	Assurance Director	Statutory Duty	Clean, Safe & Well Run	<ul style="list-style-type: none"> - Working with Barnet Safer Community Partnership to deliver the knife crime action plan - Invested in Environmental Enforcement (e.g. litter and flyposting) - Action Days with Police in Partnership with Re (Regulatory Services) - Effective use of CCTV across the borough - Work with Barnet Homes on Environmental & Regulatory Enforcement (e.g. noise and pests) and joint action across Estates. 	4	3	12	Treat	12	Same	The Serious Adults Violence Panel has continued to establish itself as a forum for information sharing and developing actions and plans for cohorts at risk of serious violence. It is interfacing well with other panels and partnership organisations including the Barnet Vulnerable Adolescent at Risk Panel (VARP), Resettlement Panel and the integrated gangs sharing tri borad meetings with local authorities and police is helping to increase the sharing of relevant information of gang and adult violence.
STR19	Failure of third party pension administrator meeting standards	Poor performance levels could result in delays meeting statutory deadlines (e.g. annual benefit statements/valuations) and/or member benefits being inaccurate or paid late resulting in enforcement action by the Pensions Regulator, which can include	Director of Resources	Finance	Clean, Safe & Well Run	<ul style="list-style-type: none"> - Recruitment of a pension manager and two supporting staff to enhance client side management and internal scheme governance. - Testing of administration data against employers annual return. - Weekly telephone calls to measure progress against service improvement plans. 	3	4	12	Treat	12	Same	Number of cases processed and achievement of service levels has improved post transition to WYFF. A first draft of a new data improvement plan is being discussed.
STR22	Sustainability of VCS	Funding and sustainability challenges facing the VCS could lead to a reduction in capacity and growth of preventative services and support not being provided to residents in hardship resulting in difficulties accessing services, demand for more complex support and residents in hardship	Assistant Director for Adults Joint Commissioning / Assistant Director - Strategy, Communications & Engagement	Business Continuity	Prevention	<ul style="list-style-type: none"> - The council maintains good relationships with strategic partners, and has aligned strategic plans where possible. It also holds regular update meetings with partners, and members and senior officers are represented on key strategic boards - Ongoing Barnet Partnership Board meetings - Continue to work with all Prevention providers - Utilise the wider Covid-19 Community Response Infrastructure Programme as a foundation for future partnership working - Commissioned work through Collaborate to inform future relationship with the VCS- joint work with Barnet Together to develop a long term plan to support local food bank infrastructure and provide a resilient community based support offer to address food insecurity - Take forward workstream within local Integrated Care Partnership focused on Prevention incorporating new innovation fund, building on the grant funding infrastructure created during Covid-19 to support new innovative initiatives in the sector - Adult Social Care Prevention Policy complies with the Care Act 2014 duty to provide or arrange for the provision of services, facilities or resources, or take other steps which it considers will contribute towards preventing or delaying care and support for adults and for carers - New strengths-based model for Adult Social Care orientates professionals towards prevention and early intervention for both carers and individuals as well as integrating community and peer groups into the model - Prevention and Wellbeing (P&W) Co-ordination Service - To mitigate the impact of Covid-19 on commissioned services, all commissioned Providers transitioned service offers to virtual or via phone with some exceptions e.g. neighbourhood services continue to offer shopping support. Where commissioned services have ceased aspects of service offer such as Dementia Community Support Services Marillac day care provision they have shifted resources to enhanced phone support/befriending support - To mitigate negative impact to VCS, Adults and Health set up a workstream under the Covid-19 Community Response Infrastructure Programme and are working collaboratively with the VCS to manage increased demand and any challenges faced - There is an agreement with the Barnet Together partnership to administrate financial support to those struggling during the pandemic. 	4	3	12	Tolerate	12	Same	The VCS has received funding from the outbreak management fund, in the form of individual grants and a new sustainability fund. A community funding officer is being recruited and will support wider sustainability of the VCS.
STR21	Covid-19 response & recovery planning	If Covid-19 infection rates rise this could lead to a further wave and restrictions on society resulting in disruption to recovery efforts, including economic and social.	Deputy Chief Executive	Finance	Prevention	<ul style="list-style-type: none"> - Business continuity plans in place - BECC prepared - Vaccinations being rolled-out - Community Collect set up for lateral flow testing - Testing sites for PCR tests - Recovery plans in place and regular status reports to CMT and Members. 	4	3	12	Treat	12	Same	Emergency and business continuity plans remain in place. Services are being asked to review their plans in light of revised working practices and consideration of service delivery going forward. Reporting on recovery plans was paused during the third national lockdown. This resumed in March 2021 with a status update to CMT and monthly reports until June 2021, in line with the Government's roadmap.
STR13	Community cohesion	Insufficient community engagement and/or participation following national and/or local tensions could lead to anti-social behaviour; breakdown of community cohesion resulting in civil unrest and an increase in hate crime.	Deputy Chief Executive	Business Continuity	Clean, Safe & Well Run	<ul style="list-style-type: none"> - Working in partnership with the police to monitor tensions and local issues, and response. - Working with the Barnet Multi Faith Forum (BMFF) and Community Together Network to increase engagement with the community. Delivering initiatives to encourage and celebrate cohesion such as Together we are Barnet. 	4	3	12	Treat	12	Same	Arrangements with council partners such as Barnet multi faith form, Barnet Together partnership and Community Together Network have continued with processes working well. Community relations are currently seen as good and positive.
STR17	Strengthening Children's safeguarding	A lack of strong safeguarding arrangements across the council could lead to children/young people suffering significant harm resulting in serious consequences to the child/young person, (e.g. potential death) and the council failing to meet its statutory duties.	Executive Director Children's Services	Statutory Duty	Family Friendly	<ul style="list-style-type: none"> - Delivery of robust delivery plan to take recommendations forward. - Monitoring of impact of delivery plan on outputs and outcomes for children, young people and families, and taking action if outcomes don't improve as expected. - Refresh of the Barnet Multiagency Safeguarding Arrangements (MASA) membership and work programme. - Leadership from the Chief Executive, Borough Commander and Lead Officer in the CCG to drive forward action plan, and galvanise resources from across the council and partners to support further improvement (including support services). - Strong communication/engagement plan at all levels of the partnership and organisation, to keep the focus, energy and momentum at all levels. 	4	3	12	Tolerate	12	Same	Partnership processes still operating in a challenging Covid-19 environment. There is an ongoing low number of Child Protection enquiries being explored.
STR15	Declining health of town centres	Changes in the retail sector (e.g. online shopping, inflexible leases, high rents) could lead to a declining health of local town centres (with low business survival rates and high vacancy rates) resulting in a poor quality place; loss of business rates and lack of local physical services; and fewer jobs.	Director for Growth	Finance	Thriving	<ol style="list-style-type: none"> 1. Dedicated officer in place to engage and support business support; dependency on the council is generally limited to maintaining a focus on council priorities 2. Putting in place SPDs and planning instruments to allow for flexibility in town centre developments 3. Working with developers in north Finchley and Edgware, bidding for GLA and government grants; seeking funding where possible; and working with major landowners to increase footfall. 4. Work with Town Teams to take responsibility 5. Continue with ongoing work on redeveloping town centres and high streets. 	4	3	12	Treat	16	Reduced	Preparation for easing of Covid-19 restrictions and reopening of high streets are ongoing. Activities are being planned to drive footfalls into town centres. The Discover Barnet campaign is ongoing and additional recruitment for further business support activities is being planned with partners. Due to the comprehensive response to the risk in mobilising and delivery, the risk score has reduced from 16 to 12.
STR08	Major regeneration schemes	Failure to effectively manage the major regeneration schemes could lead to delays resulting in significant financial implications for the council (e.g. loss of revenue) and local economy.	Director for Growth	Finance	Thriving	<ul style="list-style-type: none"> - Steering Groups are in place to discuss the works and ensure there is project documentation. - Project boards are in place to discuss and monitor the works. - Regular review at GROB (Growth & Regeneration Operations Board) and Brent Cross Governance Board. - Scheme by Scheme basis, teams will investigate market conditions. 	4	3	12	Tolerate	12	Same	The Growth Covid-19 risk register was reintroduced in January 2021 in response to the third national lockdown, which is shared among Growth & Regeneration Operations Board (GROB).

STR28	Engagement with housing sector on fire safety	Limited engagement with the housing sector could lead to their lack of compliance with Government legislation/ regulations resulting in misinformation; resident dissatisfaction and potentially unsafe housing.	Deputy Chief Executive	Health & Safety	Prevention	<ul style="list-style-type: none"> - Fire Safety Group reconvened bringing together staff from across the council (incl. TBG and RE) - Implementation of Fire Safety action plan - Compliance with MHCLG requirements for identification of buildings over 18m via Delta return (incl. desktop survey/inspection of buildings) - Upskilling Building Control staff (Level 6) to review fire safety under 'gateway 1' in planning process - Attend London District Surveyors Association (LDSA) meetings - Liaise with Fire Authority on Fire Risk Assessments - Liaise with MHCLG and Joint Inspection Team (JIT) on specific building compliance - Quarterly reports to Housing & Growth Committee - Comms with Registered Providers and private landlords - Comms to housing sector on access to funding - Listening events with cladding groups - Response to FOI requests - Member support for Inside Housing/End our Cladding Scandal. 	4	3	12	Treat		New	This is a newly identified strategic risk covering aspects of service-level risks previously identified to ensure oversight of the wider risk and potential impact from limited engagement with the housing sector as a whole. The Fire Safety Group, comprising officers from across the council including TBG and RE, has reconvened and is meeting on a regular basis. A member/officer meeting was held with representatives of local cladding groups on 17 March 2021 to listen to residents concerns about cladding/fire safety and provide oversight/clarification of the council's role in fire safety. A Q&A sheet is being drafted and will be circulated to the local cladding groups. This will also be used to inform a new council webpage about fire safety. A meeting was also held between members and local housing associations on 22 March 2021 to discuss fire safety concerns. A briefing paper is being prepared for members which will provide an update on the Fire Safety action plan.
STR10	Growth agenda	Failure to manage the growth agenda could lead to a poor quality of place (physical and social infrastructure) resulting in resident dissatisfaction; lack of community; reduced CL, New Homes Bonus and Council Tax growth; and lack of economic potential.	Director for Growth	Finance	Thriving	<ul style="list-style-type: none"> - Regular review at GROB (Growth & Regeneration Operations Board) - Scheme by scheme basis, teams will investigate market conditions - Active engagement with building industry to encourage appropriate development in the borough - Working closely with community to ensure benefits of growth are widely spread and distributed. - Developing skills and employment strategy. 	5	2	10	Tolerate	10	Same	The action plan is under constant review to ensure relevance in light of a range of emerging challenges. This is being reported to Housing and Growth Committee on a quarterly basis.
STR29	Delivery of the Barnet Plan	If the Barnet Plan is not delivered, this could lead to a lack of focus on strategic priorities resulting in lost opportunities, poor place for residents and businesses, and increased cost of service delivery.	Chief Executive	Staffing & Culture	Clean Safe & Well Run	<ul style="list-style-type: none"> - Draft Barnet Plan agreed by Policy & Resources Committee - Additional strategy staff recruited to support delivery of the Barnet Plan - Staff recruited into vacant posts in Programmes, Performance & Risk team to monitor/report on delivery of outcomes framework - Community Innovation Fund being implemented. 	3	3	9	Treat		New	The Draft Barnet Plan was agreed by Policy & Resources Committee in March 2021 and will be finalised in Q1 21/22. To help manage delivery, an outcomes framework is being co-designed with colleagues across the council and will focus on Year 1 activities and KPIs. A new Power BI dashboard is being developed, along with new reporting arrangements to senior managers and Members.
STR20	Dependency on staff to manage urgent issues	A lack of capacity/capability, shared skills/knowledge or succession planning in the workforce could lead to dependency on a small number of staff to deal with urgent issues resulting in pressure points across the organisation and potential service failure.	Chief Executive	Business Continuity	Clean Safe & Well Run	<ul style="list-style-type: none"> - Learning and development opportunities, including opportunities via Apprenticeship Levy - Workforce/succession planning - Create issues log identifying key issues and pressure points, including lead staff - Work with Directorates on contingency plans and workforce/succession planning. 	3	3	9	Treat	12	Reduced	The council's ongoing Organisational Development programme is going well and momentum is increasing, including a culture change programme, implementation of Learning Management System and various coaching and mentoring programmes. Support with Assistant Directors has continued.
STR26	Covid-19 pressure on staff	The ongoing pressures of Covid-19 on staff could lead to staffing capacity and resilience being stretched resulting in staff absences and services not being delivered.	Chief Executive	Staffing & Culture	Healthy	<ul style="list-style-type: none"> - Ongoing communications on staff wellbeing - Employee assistance programme - Managers encourage staff to take annual leave - Scheme for staff to get home office equipment (desks, chairs) - Working with Trade Unions on staff wellbeing - Managers to be sensible about priorities. 	3	3	9	Treat	9	Same	A number of activities have taken place, and are continuing, to support the wellbeing of staff. The risk remains though while the Covid-19 pandemic situation continues.
STR18	Neglecting corporate parenting duty	If the council and its partners neglect to fulfil their duty as Corporate Parents this could lead to poorer outcomes for children in care and care leavers across key areas including education, health and placements resulting in an increased gap between children in care/care leavers and their peers in the shorter term and poorer outcomes in the longer term.	Executive Director Children's Services	Statutory Duty	Family Friendly	<ul style="list-style-type: none"> - A joint motion by councillors to the Full Council in November 2015 resulted in the Barnet's Pledge for Children in Care and Care Leavers. The Children in Care Council has been refreshed and the advocacy service is active across Family Services. A Children's Services Improvement Action Plan is being implemented. The Virtual School has invested in a strong structure and resources are targeted to improve outcomes, through the Personal Education Plan (PEP) process. - The 'Onwards and Upwards' care-leaving service is located in a town centre, where care leavers can access support and a broad range of multi-agency services. Strategic links have been developed with key partners. - A multi-agency forum, Corporate Parenting Officers Group, has been established to track and monitor planning for children in care and care leavers. - Members at Full Council agreed new arrangements for the Corporate Parenting Advisory Group at its meeting on 6 March 2018. 	3	3	9	Treat	9	Same	Multi-agency forums continue to meet and there is ongoing scrutiny of data. A range of provision development is ongoing. Pressure from increased number of unaccompanied asylum seeking children (UASC) through Home Office designated hotels is placing significant pressure on the system.
STR01	Non-delivery of services	Ineffective governance, leadership, management or a weak internal control environment could lead to poor quality or non-delivery of services resulting in dissatisfaction; failure to meet statutory duties or council priorities; potential harm to the public; and legal challenge.	Chief Executive	Statutory Duty	Clean, Safe & Well Run	<ul style="list-style-type: none"> - Weekly Council Management Team meetings with regular oversight of budgets, performance, risk and audit activity - Regular reporting of budgets, performance and risk to Policy & Resources Committee, Financial Performance & Contracts Committee and Theme Committees - Annual audit of performance and risk management frameworks to ensure compliance - Annual audit plan - Monthly Internal Controls Board (ICB) - Regular reporting of audit activity to Audits committee - Controls to mitigate the associated risk, AG020 – If audit actions are not implemented this could lead to a deterioration in the council's control environment and result in the Head of Internal Audit providing a Limited Assurance Annual Opinion. 	3	3	9	Treat	9	Same	Performance monitoring of the Corporate Plan (Barnet 2024) remains paused whilst the focus is on Covid-19 and the new Barnet Plan is finalised. Performance monitoring of strategic contracts such as CSG and RE has continued with Q3 20/21 performance reported to Financial Performance & Contracts Committee in March 2021. Risks reviews take place every quarter and high-level risks are reported to Policy & Resources Committee. The percentage of audit actions completed in Q3 21/22 was 76% against the target of 90%, which was reported to Audit Committee. The audit plan will not be delivered in comparison to a typical year due to the impact of Covid-19, which could affect the annual audit opinion.
STR27	Vaccination redeployment	Should staff be redeployed to support the Covid-19 vaccination programme this could lead to council services being short staffed resulting in council activities not being fulfilled and increased cost if temp staff are needed.	Chief Executive	Business Continuity	Clean Safe & Well Run	<ul style="list-style-type: none"> - Business continuity plans in place - Adaptability within the workplace - List of critical/priority services drawn up. 	4	2	8	Tolerate	12	Reduced	The vaccination programme is progressing well and the draw on council staff so far is not creating unmanageable pressure within service areas.
STR07	Workforce engagement	Insufficient staff engagement (lack of investment and empowerment) and inadequate succession planning could lead to problems with recruitment and staff dissatisfaction, skilled staff leaving and high vacancy rates resulting in failure to meet statutory duties or council priorities; and workforce and financial pressures.	Chief Executive	Staffing & Culture	Clean, Safe & Well Run	<ol style="list-style-type: none"> 1. A new recruitment system is in place to improve and streamline the recruitment process making it easier for both hiring managers and prospective candidates. 2. The council has invested in new office accommodation to provide a new, modern working environment to support flexible working 3. The council is investing in its training and development offer so that staff can continuously develop within their profession, including accessing opportunities presented by the Apprenticeship Levy. 4. Continued roll out of the healthy workplace charter action plan with a rolling monthly programme of healthy initiatives for staff. 5. Develop and monitor HR improvement plan. 	4	2	8	Tolerate	8	Same	Learning Management System now implemented. Organisational Development agenda continuing apace, including work to embed values and behaviours
STR02	Customer experience	Lack of joined up of systems across the council and strategic partners, skilled staff or training could lead to customer expectations not being met resulting in a poor customer experience or quality of service.	Deputy Chief Executive	Finance	Clean, Safe & Well Run	<ul style="list-style-type: none"> - Demand reduction initiatives with high volume services and CSG agreed with timelines for delivery - Customer transformation programme delivering a range of online improvements which should limit the need for customers to call us - Safeguards in place to protect service areas that are used by the most vulnerable residents and those that cannot get online - Monthly web performance meeting group are held - Accessibility reports are run to address shortcomings in accessing content for customers with accessibility needs. 	4	2	8	Treat	8	Same	Discussions have occurred with strategic partners and an Outline Business Case has been put together for Policy & Resources Committee to provide options and costs. The new Street Scene system went live on a phased approach, with it completing by end January 2021. Feedback has been broadly positive in its early days.

STRO4	Financial management	If financial management and controls are not sufficient this could lead to budget overspend, non-achievement of MTFs targets and the council not ensuring appropriate administration of public funds resulting in possible financial and reputational losses.	Director of Resources	Finance	Clean, Safe & Well Run	- Covid-19 has led to a wider review than usual of the financial position as we seek to ensure that council finances are stable, and any threats to that are identified early - Challenge to financial forecasts occurs on a regular basis by Finance Business Partners - Regular, in depth reporting is considered by Council Management Team, Financial Performance & Contracts Committee and Policy & Resources Committee. - Mitigating actions to contain overspends are identified and implemented - Achievement of savings tracked and alternative actions indentured where not achievable - Officers were reminded of their responsibilities under the Financial Regulations when budgets were set in March 2020. In addition budget holder training is available and a refresh will be rolled out during the year. - A contingency budget is held centrally for any unmanageable, unforeseen pressures.	3	2	6	Tolerate	6	Same	The risk is staying the same due to ongoing Covid-19. This has led to a wider review than usual of the financial position as we seek to ensure that council finances are stable, and any threats to that are identified early.
STRO9	Increase in the NLWA levy	The expected replacement of the NLWA Energy from Waste (EFW) facility (expected 2026) could lead to an increase in the NLWA waste disposal/treatment levy of potentially up to £9 million per annum and any additional financial cost relating to delays in the construction of the EFW resulting in an increased financial pressure on the council.	Executive Director Environment	Finance	Clean Safe & Well Run	- Active engagement through officers and NLWA Members. - Development of long-term financial strategy. - Ongoing analysis of waste data flows.	2	3	6	Tolerate	6	Same	The Energy Recovery Facility (ERF) procurement is proceeding to timetable. Borough Members and Officers were notified in January 2021 that one of the bidders is buying out one of the other bidders, therefore there are two companies progressing in the ERF procurement. Regular updates and discussions continue to take place with Directors of Finance, Directors of Environment and NLWA Members.
Service Risks													
Adults													
AC004	Surge in demand from the NHS	An unpredictable surge in demand from the NHS in situations where there is limited capacity could lead to the directorate being unable to meet this demand within the NHS's required timescales resulting in financial consequences, operational disruption leading to decisions being made that have unintended negative consequences, potentially for individuals that have been discharged, and increased Government scrutiny.	Director of Adult Social Care	Statutory Duty	Healthy	- System-wide resilience money is available on top of BCF and IBCF funding. These are used across a number of activities whether to create extra capacity, increase assessment capability or support new initiatives such as Discharge to Assess. - There are daily, weekly and monthly meetings between LBB, CCG and NHS Provider Trusts to develop effective system working across Barnet and NCL more widely. - There are regular calls throughout the week which focus on management of patients who are almost ready to leave hospital. - There is active monitoring of referral and activity data with shared performance reports and escalation of issues with partners.	4	4	16	Treat	16	Same	The last quarter saw a significant increase of pressure in both the acute and rehab settings as a result of the surge in Covid-19 seen nationally. This led to higher numbers of Covid-19 positive patients in Barnet Hospital, higher than the first wave in spring 2020. The council also faced the continuing challenge of outbreaks of Covid-19 in care homes, as well as in hospitals, which affected the ability to discharge patients or have them return to their care homes.
AC044	Leisure operator performance against contract	The performance of the leisure operator to deliver against contractual obligations and commitments could lead to the health and wellbeing priorities not being fulfilled resulting in possible consequences to service delivery and finances.	Assistant Director Greenspaces & Leisure	Business Continuity	Healthy	- The leisure contract continues to be monitored in alignment with the Performance Management Framework to ensure delivery against obligations / commitments and targets are met. An unexpected closure of the pools at Finchley Lido Leisure Centre since March 2020 will impact the achievement of performance and financial targets/projections. The SPA team are working with the leisure operator to understand and minimise impact. Disrupted service delivery is being absorbed at other leisure facilities where possible and public Comms is being managed.	5	3	15	Treat	15	Same	Leisure facilities have been closed since the third national lockdown on 4 January 2021. During this and past closure periods, the council continued to work with GLL on a recovery plan for services. This is parallel to completing a legal and financial assessment in consideration of financial supplier relief from July 2020 - 31 March 2021 (at an anticipated total value of £1.1m).
Assurance													
AG020	Audit actions not implemented	If audit advice and/or agreed actions are not implemented, or temporary interim controls during Covid-19 are not adapted once 'BAU' resumes, this could lead to a deterioration in the council's control environment resulting in the Head of Internal Audit providing a Limited Assurance Annual Opinion.	Head of Internal Audit	Statutory Duty	Clean, Safe & Well Run	- Audit actions are recorded on Audit Tracker and discussed at monthly Contract Management Meetings (CSG and Re) to encourage implementation - Auditees are emailed asking for updates/evidence in advance of quarterly reporting to Audit Committee - Monthly Internal Controls Board (ICB) when officers are asked for updates against their actions and challenged if progress not made - Attendance required at Audit Committee if not implemented - Audit actions are agreed with auditees (as opposed to audit recommendations with management responses) to improve clarity over what is expected in order for audit to assess as implemented - Internal Audit Manager role created, key aspect of role is to manage the follow-up process including new approach to following up a sample of Mediums, launched November 2019 (approved by Audit Committee in October 2019).	4	4	16	Treat	16	Same	Due to Covid-19 and end of year leave, officers across the council and partners have had less capacity to implement audit actions. The percentage of audit actions implemented or superseded remains below the 90% target.
AG052	Insurance and risk management	If the council fails to arrange adequate insurance of assets or implement risk recommendations this could lead to significant financial loss (e.g. Loss of buildings) and claims resulting in substantial financial penalties and outlays.	Assurance Director	Finance	Clean, Safe & Well Run	1. External broker supporting insurance arrangements. 2. Annual review of insurance cover.	5	3	15	Treat	15	Same	Actuarial provision calculations have been agreed and will be implemented as of 31 March 2021, with premium insurance charges with Finance. An insurance report of claims and risk activity is being drafted and will be shared with Council Management Team/Heads of Service.
Environment													
PI006	Variations in year on budget for parking	If there are uncertain or fluctuating levels of non-compliance linked to parking, parking transactions or an overspend within the service; this could lead to unanticipated variations in year which could affect the achievement of the budgeted net surplus, resulting in a reduced surplus to fund planned activities and increased pressure on the general fund.	Infrastructure and Parking Manager	Finance	Thriving	1. Budget setting/monitoring process - monthly reporting 2. Tracking income levels regularly 3. Medium term financial models to be widely shared and understood 4. Strong activity linking to all budget monitoring and close contract management.	4	5	20	Treat	20	Same	Covid-19 continued to have a detrimental effect on immediate and longer-term Parking Income due to drop in demand for paid parking and reduced car journeys. The outturn position for the Special Parking Account for 20/21 is an estimated loss of parking income due to Covid-19 of £10.114m. The underlying budget position is an overspend of £0.086m. The off-street parking account outturn position is an estimated loss of parking income due to Covid-19 of £0.589m, mainly due to economic slowdown, walking or cycling and competition from private parking discounted or free. Excluding this there is an underlying budget position of an overspend of £0.152m.
TS013	Passenger Transport Services move	If a new location or lease is not extended for the PTS vehicles, this could lead to a disruption to the Home to School transport service for Special Education Need children in and out of borough resulting in increased costs and potential service disruptions.	Street Scene Director	Business Continuity	Clean, Safe & Well Run	1. Depot move project are currently working on space planning exercise for Oakleigh Depot and adjacent sites. There are two other sites being considered as a back up, if there is insufficient space.	5	3	15	Treat	15	Same	A 12-month extension is in the process of being finalised. The risk score remains unchanged whilst long-term arrangements are being finalised.
Growth & Corporate Services													
G&C031	Team resource/capacity to deliver employment schemes	If there are insufficient resources to support employment programmes this could lead to fewer employment schemes for residents in need resulting in unemployment levels not changing.	Director of Growth	Business Continuity	Thriving	1. Resident need is being prioritised to ensure that those furthest from employment remain the focus of scarce resources. 2. Re/LBB maintaining flexible use of Section 106 income to provide an appropriate level of support by multiple service depts. and partners. 3. Continued engagement with developers on regeneration estates (e.g. NHG, Countryside Properties, MHT) 4. Maintain focus on priority communities through employment and skills initiatives on regeneration estates. 5. Use of Section 106 funding to support key employment programmes 6. Ongoing discussion with Argent regarding resources for employment and skills coordination on BXC development.	4	4	16	Treat	4	Increased	Continuation funding for existing employment and skills programmes has been confirmed. An employment and skills strategic review is underway, which will identify additional resource requirements.

G&C077	Affordability of the Thameslink project	If the Brent Cross budget is not managed effectively this could lead to major pressure within the HMG grant funding budget resulting in increased costs to the council.	Deputy Chief Executive	Finance	Thriving	1. The Governance Board has oversight of the project budget, monthly meetings are in place to review this. 2. Dedicated finance resource has been recruited, providing a direct liaison between LBB finance and the project 3. Mace has undertaken a deep dive of the AFC and has put in place an efficiency plan that is reviewed monthly in between the client review meetings. 4. a further review will be undertaken in June following completion of the railway works during the major rail possessions in May as the projects risk profile will change subject to those works being completed, the feedback from network rail is that they have a high degree of confidence in completing these works.	5	3	15	Treat	15	Same	Despite budget pressures, the project is progressing well and remains on track to open in 2022. Mace continue to review efficiencies throughout the supply chain, to manage the budget position, and this is reported on monthly at client review.
G&C084	Hendon Hub Redevelopment	If planning, funding and tenant commitment for the Hendon Burroughs redevelopment project is not secured following public consultation/ committee, this could lead to the resultant write-off of costs to date resulting in a financial loss for the council.	Assistant Director - Estates	Finance	Thriving	- There are a series of pre-applications with both LBB and GLA planners - Soft market testing of funding routes. - Soft market testing of construction procurement.	5	3	15	Treat	15	Same	Heads of terms have been agreed with Middlesex University, and soft market testing on construction routes is to commence. The Section 151 Officer/Director of Resources and programme team are discussing the funding route with KPMG and others. Redevelopment is subject to public consultation/committee decision.
Public Health													
PH06	Pandemic type disease outbreak	A Declaration of Pandemic (inc influenza) by the World Health Organisation (WHO) could lead to severe resource and capacity issues for the council and partner agencies resulting in an impact on service delivery and the health protection of residents.	Director of Public Health and Prevention	Statutory Duty	Prevention	1. Evoking of Barnet multi-agency pan flu to respond the Covid-19 pandemic. 2. Performing pandemic preparedness exercise. 3. Monitor outbreaks on a local level 4. Local Outbreak Control plan is in place 5. Providing PH leadership and professional advice for the council's pandemic response.	5	4	20	Treat	20	Same	The Containment Outbreak Management fund has been used to recruit additional resources and the council is working with RE to assist with delivery of contact tracing services. Priorities are: focusing on asymptomatic testing and supporting vaccination roll-out. There is a continued risk around Covid-19 variants and the impact locally.
Resources													
FIN001	Impact of uncertainty on finances	The uncertainty of the national and regional political landscape, legislative changes and local government funding could lead to changes that affect council services resulting in a further reduction of the multi-year budget.	Director of Resources	Finance	Clean, Safe & Well Run	- Contingency and reserves in place to mitigate the short term impact. - Undertake forward planning, regularly updating budget assumptions and monitoring the Government's fiscal announcements. However, also maintain flexibility within existing plans to instigate recruitment freezes in non-frontline services whilst long term plans are being put into place. - Maintain good contacts with Government to remain as informed as possible.	5	4	20	Treat	20	Same	The national and regional political landscape continues to be uncertain. Whilst budgets are actively monitored, a need to find additional savings has been identified.
FIN002	Implementation of savings	If MTFs savings are not fully implemented this could lead to non-achievement of MTFs savings targets and an overspend on the revenue budget resulting in an impact on services and financial consequences for the council.	Director of Resources	Finance	Clean, Safe & Well Run	- Monthly budget monitoring. Covid-19 has led to a wider review than usual of the financial position as we seek to ensure that finances are stable, and any threats to that are identified early - Budget setting process validating savings.	5	4	20	Treat	20	Same	Monthly monitoring arrangements and budget setting processes are in place to manage the risk. The latest data shows that additional savings will need to be identified for 2021/22.
Joint Risks													
The Barnet Group (TBG)													
TBG003	Increase in demand for homelessness services impacting on housing general fund budget	Failure to prevent households becoming homeless could lead to an increased demand for expensive temporary accommodation resulting in raised budget pressures in the General Fund.	Head of Housing & Regeneration	Finance	Thriving	1. Deliver Homelessness and Rough Sleeping Strategy Objectives of Increase Prevention Activity and Reducing Temporary Accommodation Use by: - Ongoing project to look at further ways of reducing homelessness (investment in upstream prevention work / using council assets to build more homes) - Regular performance indicators and financial monitoring - Horizon scanning of legislation changes and lobbying for more funding from Government - - In house lettings agency for procurement of PRS properties - Improve insight and intelligence through housing Supply and demand modelling - Links to Housing, Homelessness and Growth Strategies outcomes - Increase affordable housing supply through new acquisitions programme - Tracking ongoing impact of Homelessness Reduction Act.	4	4	16	Treat	16	Same	Acquisitions of homes into Opendoor Homes and HRA stock has continued in Q4 20/21 and whilst the numbers have increased on previous quarters progress has been hampered by Covid-19 restrictions slowing down the surveying and conveyancing processes. All efforts have been made to move rough sleepers out of emergency accommodation and into more permanent homes utilising the E3m of Government funding secured by Barnet Homes, which includes the purchasing of units specifically for rough sleepers into Opendoor Homes. Supply and demand modelling have been updated to reflect the potential impacts of the pandemic on homelessness in the coming year and plans are being developed in response to expected levels of increased demand.
TBG006	H&S/ Compliance incident	If Barnet Homes fail to achieve regulatory requirements for the housing stock this could lead to health, safety and compliance issues resulting in death to staff and public, legal challenges and financial costs.	Deputy Def Executive	Statutory Duty	Thriving	1. Policies and procedures include H&S management system; training; induction for new staff; management structures for contract management 2. Supplier contracts/agreements for Temporary Accommodation providers include risk assessment; Violent and Abusive register; Vulnerable Tenant password scheme; risk and compliance team that deals with technical risk; risk and compliance risk register and action plan; internal schedule of internal audit; internal lead for safeguarding; fire risk assessment; British Safety Council Audit - periodic (every 3 years); CQC audit (ad hoc as decided by CQC); near miss analysis; root cause analysis; use of specialist partners 3. Involvement on London Councils and MHCLG Directors Fire Safety forums 4. A programme of fire safety works to high-rise blocks has been developed and approved by the Housing Committee on 21/06/18.	5	3	15	Treat	15	Same	The fire safety improvement programme to council stock continues with some delays due to Covid-19. Large Panel System building was completed at West Hendon. The third national lockdown in Q4 20/21 has impacted on some landlord compliance functions, due to residents refusing access and increased number of people shielding until 31 March 2021 on Government advice. There is a high compliance risk on Your Choice Barnet care homes.
CSG													
CSG123	IT cyber security	A cyber attack could lead to the council being unable to operate resulting in widescale disruption and financial cost.	Commercial and Customer Services Director	Business Continuity	Clean, Safe & Well Run	- There are multiple-layer fire walls to protect the environment. - Annual Security Health Check (PSN Standard) - PSN Accreditation - Annual review of over 100 cyber security controls, aligned with ISO 27001 - Quarterly scanning of externally facing websites. - Monthly scanning (Monthly) of the estate for vulnerabilities and follow up activities to remediate. - Monthly patching cycle of the server estate. - Anti-virus on the server estate. - Subscribe to National Cyber Security Centre (NCSC) early warning system and web check. - Receive weekly updates from NCSC to confirm vulnerability status. - Receive weekly and critical updates from Microsoft/ Capita. - Run books which are reviewed quarterly as how to respond to potential various cyber security threat scenarios. - Multi-factor Authentication for colleagues to access the estate. - Complex passwords. - A process to identify inactive accounts when leavers are not notified to the CSG IT – thus disabling the account. - Alerting and monitoring for suspicious e-mails. - Notification of those working abroad. - Reviewing the list of those working abroad and curtailing access for un-notified persons. - Third party access is controlled via Token access granted on a case by case basis. - End point devices have encrypted and locked down unless by exception.	5	3	15	Treat		New	This is a new risk identified in light of cyber security attack on LB Hackney. Extensive controls/mitigations in place, but due to level of impact risk score at 15.
Re													

JR51	Environmental Health income generation	Covid-19 restrictions could lead to environmental health officers being unable to complete income generating activities resulting in income targets not being met and financial shortfalls.	Head of Counter Fraud	Finance	Healthy	- Monitoring workforce arrangements in place - Gradual return to Business As Usual plan has been agreed between LBB and Re.	4	4	16	Treat	16	Same	A Contract Management Meeting was held in mid-March 2021 and a phased return to Business As Usual was agreed following advice from Public Health. The Regulatory Services Director is investigating how to achieve this.
JR3	Appeals and Public Inquiry impact on resources	Appeals and public inquiries made against enforcement notices could lead to pressure on resources resulting in work commitments not being delivered and legal challenge.	Commissioning Lead - Planning	Statutory Duty	Thriving	1.Continued liaison with Officers Working Group 2.Special measures for handling of the application in place (rota of staff in place to remove comments from website including at weekend, mandatory briefing of all planners, targeted and all Members sessions and communications, extended consultation, liaison with HB Public Law, provision of Q&As to all planners and Members).	4	4	16	Treat	6	Increased	The impact of processing the Golders Green Hippodrome application on the rest of the service has been significant and is being mitigated as much as possible through existing resource plans. The main concern is the potential impact on availability of senior officers and competing priorities due to the high-profile nature of the application and potential legal challenges that may arise. Due to this, the risk has increased to 16.
JR60	Unsafe/ unhealthy living accommodation in private rented sector	A backlog of case could lead to vulnerable residents being exposed to unsafe/unhealthy living conditions resulting in statutory duties not being fulfilled.	Head of Counter Fraud	Statutory Duty	Healthy	1. Triage and prioritisation system to target highest risk cases 2. Agreed process in reporting backlogs to LBB.	4	4	16	Treat	12	Increased	A Contract Management Meeting was held in mid-March 2021 and a phased return to Business As Usual was agreed following advice from Public Health colleagues. No agreements have been reached on additional resources or KPI relief. The risk score has increased to reflect that higher priority cases may have not been investigated and additional actions are needed to correct this.
PI021	Capital infrastructure	If there is inadequate funding to allow the council to maintain the Highways Assets this could lead to failures to meet statutory duties resulting in increased third party claims and worsening condition of the highway network.	Executive Director - Environment	Finance	Clean, Safe & Well Run	1. Maintain a strong focus on Asset Management and preventative treatments. Ensure that the council pursues all opportunities to secure external funding. 2. Ensure that Asset Management Plans are in place, are robust and provides a range of solutions that are best aligned with likely resources 3. Ensure that appropriate monitoring and inspection is taking place to fully understand the constantly changing condition of all Assets 4. Review the range of materials/methods/options to be adopted with a view of ensuring that limit resources are put to the most appropriate use to maximise the % of network/asset improvements that also maximises the life of the Assets and hence provides best value	3	5	15	Treat	15	Same	The council has agreed an additional three years of funding for the NRP programme. The service is still seeking pressure funding for revenue expenditure pending Policy and Resources Committee.



Policy and Resources Committee

June 16 2021

Title	Barnet's Local Plan – Publication - Regulation 19 Town and Country Planning (Local Planning) (England) Regulations (Reg 19)
Report of	Chairman of the Policy and Resources Committee
Wards	All
Status	Public
Urgent	No
Key	Yes
Enclosures	<ul style="list-style-type: none"> • Appendix A - Barnet's Local Plan – Publication (Reg 19) • Appendix B - Barnet's Local Plan – Schedule of Representations and Responses to Preferred Approach Regulation 18 Town and Country Planning (Local Planning) (England) Regulations (Reg 18) • Appendix C – Barnet's Local Plan – Publication (Reg 19) – Equalities Impact Assessment
Officer Contact Details	<p>Nick Lynch - Planning Policy Manager (0208 359 4211) Nick.lynch@barnet.gov.uk</p> <p>Neeru Kareer – Assistant Service Director Planning and Building Control (0208 359 7477) Neeru.kareer@barnet.gov.uk</p>

Summary

Setting out a planning policy framework which the Council will use to make decisions about how Barnet will change as a place over the next 15 years, the Local Plan is one of the most important statutory documents that must be produced for the Borough.

The shadow cast by the **COVID19** pandemic and the rapid changes to how people live, learn, work and travel have wide-ranging and long-reaching consequences especially for younger people, minority communities and the most vulnerable. As the spatial framework for managing change the Local Plan is able to form the basis for responding to these challenges, supporting Good Growth and being sufficiently flexible to adapt to any more rapid changes in the future.

The (Reg 19) Publication Local Plan is the document that will be submitted to the Planning Inspectorate for Examination in Public. It is the version that the Council seeks to adopt, subject to that examination, as the framework for decision making on planning. The Publication Local Plan takes account of responses from the previous consultation on the Local Plan (Reg 18) - Preferred Approach in early 2020. At the Publication stage representations are required to focus on the 'soundness of the plan' as set out in the National Planning Policy Framework. To be found sound the Local Plan has to be positively prepared, justified, effective and consistent with national policy. Representations on the soundness of the (Reg 19) Publication Local Plan will be submitted to the Planning Inspectorate for the Examination in Public along with the Local Plan and supporting evidence. It is likely that responses to this regulatory stage will result in further proposed changes to the Plan as part of the Examination in Public. The Examination in Public is expected to take place in Spring 2022 and subject to that examination adoption of the new Local Plan is not expected until late 2022.

Officers Recommendations

That the Policy and Resources Committee:

- 1. Consider the responses to consultation at Local Plan – Preferred Approach - Regulation 18 (as set out in Appendix B);**
- 2. Approve the Draft Local Plan – Publication - Regulation 19 (as set out in Appendix A) for public consultation;**
- 3. Delegate authority to the Deputy Chief Executive to make any further minor changes to the Local Plan in consultation with the Chairman of the Policy and Resources Committee prior to public consultation.**

1. WHY THIS REPORT IS NEEDED

- 1.1** The Policy and Resources Committee on January 6th 2020 approved the Local Plan Preferred Approach (Reg 18) for public consultation. On May 24th the Policy and

Resources Committee approved the Community Infrastructure Levy (CIL) Draft Charging Schedule for submission to the Planning Inspectorate for examination. Submission in advance of the Local Plan enables the new CIL rate to come into effect sooner and help deliver the Local Plan by increasing the funding for critical infrastructure CIL to support growth.

- 1.2 The Local Plan has now progressed to the next regulatory stage. The Local Plan shapes the future of Barnet as a place, looking ahead to 2036, providing the overarching local policy framework for delivering sustainable development. It is a strategic document that acts as the spatial expression of corporate strategies. The Publication Local Plan (Reg 19) consists of 52 policies and 66 site proposals. It will eventually replace the Core Strategy and Development Management Policies documents adopted in 2012. Adoption of the new Local Plan is not expected until late 2022. This is the version which, together with representations on the soundness of the Local Plan, will be submitted for examination.
- 1.3 Increasing weight is attached to Local Plan policies considered sound. Following submission of the Plan for examination it will be a more significant material consideration in planning decisions.

Response to Local Plan Preferred Approach

- 1.4 The Local Plan Preferred Approach was subject to extensive public consultation in early 2020, prior to the COVID19 national lockdown. This provided the opportunity for interested parties and statutory consultees to be involved at an early stage. Engagement activities included 30 face to face events reaching an estimated audience of 800 persons. As well as six public events on the Reg 18 a range of groups were reached through presentations to the Health and Wellbeing Board, Safer Communities Partnership and Children and Young People Board as well as Barnet School Governors, Barnet Youth Board, Barnet Age UK, MENCAP Barnet, Barnet Multi-Faith Forum, Federation of Small Businesses, Job Centre Plus, CommUNITY Barnet, Professional and Young Peoples Forum. As part of the engagement on the more focused Reg 19 the Council will prioritise events with 'protected characteristics' groups.
- 1.5 Consultation generated in excess of 2,000 representations from 450 individual representors including 300 anonymous responses submitted through online questionnaires. Further details of Reg 18 engagement and the responses it generated are set out in the Reg 18 Consultation Statement.
- 1.6 Feedback from statutory agencies including the Environment Agency, Natural England & Historic England have set out issues of soundness while the Mayor of London has set out issues of non-conformity with the London Plan. The Council has sought to resolve these issues through changes to the Local Plan.
- 1.7 All responses have informed the production of the Publication Local Plan. Appendix B sets out how the Council has responded to the issues raised in the consultation. The main policy challenges raised are housing numbers, infrastructure provision and the future of town centres. More detailed issues of concern were focused on the size of new homes, managing the conversion and redevelopment of existing houses, the impact of tall buildings and the need for making provision for car parking. The Council has sought to provide greater reassurance on these issues through changes to Local Plan policies and supporting text.

- 1.8 With regard to the 66 site proposals the main concerns expressed were about indicative housing numbers, building heights, preferred land uses, flood risk, biodiversity and protection of Metropolitan Open Land / Green Belt. Although many of these issues cannot be resolved without more detailed work at application stage the Council has sought to provide greater reassurance through changes to the Local Plan Schedule of Proposals.

Publication Local Plan

- 1.9 Engagement with Members on the Local Plan has been ongoing since Autumn 2017. The cross-party Local Plan Members Advisory Group serves as a sounding board for feeding general and specific, locally-based opinions and views from residents' forums, into the preparation of the Local Plan. The Group has met twelve times to discuss evidence, policies and site proposals. In April 2021 the Group signed off the Reg 19 version as the basis for consultation and the future framework for decision making on planning. A few revisions have been made to the Reg 19 since Members Advisory Group largely as a consequence of the Planning Inspectorate Advisory Visit. The most significant change is the reduction of the housing target.
- 1.10 The period since consultation on the Preferred Approach Local Plan in early 2020 has witnessed significant change in terms of the shadow cast by the COVID19 pandemic and the rapid changes to how people live, learn, work and travel. Many of these changes have wide-ranging and long-reaching consequences especially for younger people, minority communities and the most vulnerable. As the spatial framework for managing change the Local Plan is able to form the basis for responding to these challenges, supporting Good Growth whilst being sufficiently flexible to adapt to any more rapid changes in the future.
- 1.11 Although the Local Plan looks ahead to 2036, it will be reviewed, as recommended by the National Planning Policy Framework (NPPF) within five years in order to reflect changing circumstances locally or changes to national policy. Evidence of the long term impact of COVID19 on Barnet and London, in particular on demographic projections, will feed into the review of the Local Plan as well as the London Plan.
- 1.12 The Government will introduce a Planning Bill later in 2021 which proposes to fundamentally reform the planning system in England. This will inflect intentions set out in the Planning White Paper published in 2020 to streamline the planning process with more democracy taking place more effectively at the plan-making stage, taking a radical, digital-first approach to modernise the planning process. This means moving from a process based on documents to a process driven by data. Role of land use plans should be simplified with Local Plans zoning three types of land – Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected. Proposals for Local Plan reform will take considerable time, changes to developer contributions and development management require primary legislation followed by secondary legislation. In order to respond to these challenges it remains important that Barnet progresses its Local Plan through the existing system with adoption in 2022.
- 1.13 The Government published a Ministerial Statement on May 24th 2021 which set out its plans for the delivery of First Homes as an element of affordable housing, defining the product and changes to planning policy. The Council's approach to First Homes including level of discount will be firmed up and clarified as part of the Examination in Public of the

Local Plan. This will be set out in a Modification which will be consulted on as part of the Examination process.

- 1.14 The Local Plan is supported by an extensive evidence base. This is available on the Local Plan webpages. Additional evidence on the viability of the Local Plan, a new Infrastructure Delivery Plan, Stage 2 Strategic Flood Risk Assessment, Strategic Transport Assessment and updated Barnet Car Parking Study and Gypsies, Travellers, and Travelling Showpeople Accommodation Assessment have been published or will be published to support the Reg 19. The Viability Assessment tested the ability of development to accommodate emerging policies in the draft Local Plan, alongside other plan policies in the London Plan and rates of Community Infrastructure Levy ('CIL') in the Council's Draft Charging Schedule.
- 1.15 As part of the preparations for the future scrutiny of the Local Plan at Examination in Public the Council has benefited from an online Planning Inspectorate Advisory Visit by an experienced planning inspector. This provides Barnet with advice on the emerging Local Plan and the supporting evidence base. The Inspector queried use of objectively set need of 46,000 new homes as the minimum housing requirement in the Local Plan. She recognised uncertainty about revised capacity based London Plan target of 35,460 new homes (confirmed in March 2021) and the Government's unconstrained Standardised Assessment. Her main advice was that Barnet should rely on the lower housing target of 35,460 as the London Plan is now published. Against this minimum target Barnet can demonstrate more strongly through its supply of 46,000 new homes, as set out in the Growth and Spatial Strategy policies, that this is deliverable.

Publication Local Plan – Suite of Policies

- 1.16 The Growth and Spatial Strategy section of the Reg 19 Local Plan sets out how this housing growth will be distributed across regeneration areas in Brent Cross and Colindale together with growth areas in Barnet's town centres, around transport nodes and along major thoroughfares.
- 1.17 The 52 policies in the new Local Plan will replace the 34 policies set out in the Core Strategy and Development Management Policies that were adopted as Barnet's Local Plan in 2012. Significant changes to the Local Plan in response to the consultation at Reg 18, new evidence and changing circumstances are set out in italics. In summary:
- **Challenges and Opportunities** sets the baseline for the Local Plan covering Barnet's Character, Housing, Economy and Town Centres, Environment, Health and Wellbeing as well as Transport.
 - *New sections have been added on Barnet's response to COVID19 and highlighting the opportunities for Good Growth utilising Barnet's advantages to deliver sustainable growth that works for everyone, contributing to strong and cohesive, family friendly communities, promoting healthy living and wellbeing, as well as delivering the homes that the Borough needs.*
 - Barnet's **Vision and Objectives** sets out the spine of the Local Plan outlining the benefits of well planned growth between 2021 and 2036. Barnet's Spatial Strategy for growth highlights that by focusing on sustainable locations the impacts of development on the climate will be better managed.

- *Revised to emphasise the Borough's natural and historic environment as well as town centre recovery and that Barnet continues to be a family friendly place where the positive benefits of growth and investment are accessible to all residents. Table 2 shows how the key objectives are being delivered by Local Plan policies. Policy BSS01 sets out Barnet's minimum housing requirement of 35,460 new homes by 2036 (reduced from 46,000). It also removes boroughwide targets for new retail space in response to national changes to the Planning Use Classes Order in September 2020. There is more emphasis on the distribution of growth to Opportunity Areas (Brent Cross, Colindale and New Southgate) together with Barnet's Growth Areas and Town Centres.*
- The **Growth and Spatial Strategy** Chapter sets out in a suite of 13 strategic policies where Sustainable Growth will be focused. This policy framework further shapes the regeneration of **Brent Cross** and **Colindale**, as well as identifying new areas of significant growth in main town centres at **Cricklewood** and **Edgware** and around new (as at **Brent Cross West**) and existing public transport nodes. Policies for these Growth Areas set hooks for more detailed area planning frameworks to come forward.
- *Further safeguards on the contributions of small sites and the use of area wide design codes in delivering new homes. Growth requirements updated in response to Use Classes Order. Supporting text revised in terms of the new minimum housing target of 35,460 new homes.*
- The Local Plan's approach to **Brent Cross** is reflective of a large and complex scheme which will need to deal with changes in economic and market conditions in particular retail trends. Therefore, the Council's approach is to create a policy framework for the Brent Cross Growth Area capable of responding to change in the long-term. Progress on Brent Cross will be measured against appropriate milestones in the Local Plan.
- *Supporting text updated to highlight that Council seeks comprehensive development of the Brent Cross Growth Area. Reflects that although Brent Cross North, Town and West (Thameslink) remain in different land ownerships the Council will seek to ensure that development and delivery of these strategic areas is co-ordinated. This entails that the development and delivery of these strategic areas is not delayed or fettered by the other.*
- **Mill Hill East**, in particular Millbrook Park, is an example of good suburban growth which the Council promotes with new Local Plan proposals at Mill Hill East Station and Watchtower House.
- *Greater emphasis that growth must support public transport improvements and demonstrate how sustainable transport options will be provided. More reassurances about no development on Green Belt unless previously developed land.*
- In addition to Cricklewood and Edgware Main **Town Centres** at Burnt Oak, Chipping Barnet, Finchley Central / Church End, Golders Green and North Finchley form the Council's priorities for investment and revitalisation, supporting local businesses and delivering mixed use development in accordance with the place making policies of the Local Plan. To pursue objectives for individual town centres the Council will utilise more detailed area frameworks similar to the Supplementary Planning Document (SPD) at Edgware.

- *Supporting text revised to emphasise locational opportunities for these Growth Areas, highlight Mayor's Healthy Streets approach and the need for more flexible policy approach to support COVID19 recovery. Emphasises vital role in delivering thriving town centres and providing a focus for cohesive communities, while delivering new jobs and homes.*
- Policy on **Major Transport Infrastructure** highlights the opportunity to deliver a density and quantum of residential units which optimise potential of locations around stations including West London Orbital stations (services not expected until 2027, at the earliest). Re-provision of car parking spaces is supported through a more land efficient design approach as set out in the policy on **Car Park Redevelopment**.
- *Sets out requirements on how public transport usage and active modes of travel will reduce demands for station car parks. Importance of car parking supply to thriving town centres is balanced with potential for more land-efficient design.*
- The Local Plan sets out an approach to **Estate Renewal and Infill** that is consistent with the London Plan and the Mayor's Good Practice Guide to Estate Regeneration.
- *In response to Mayor's objections replace existing affordable housing whilst considering specific circumstances of each site; Ensure that an equivalent amount of affordable housing floorspace be provided as a minimum and seek an uplift in such provision.*
- Policy on **Major Thoroughfares** is a response to unmanaged growth along main road corridors such as the A5, A1000, A504 and an opportunity to promote design solutions to mitigate noise and air pollution. The Local Plan identifies the A5 and A1000 as new strategic locations that may be appropriate for tall buildings in certain places. The Council will produce SPD on Building Heights which will set out, within such locations, the parameters for tall and very tall buildings.
- *Emphasise that development must have a positive impact on thoroughfares and design should relate to suburban streets behind it*
- The Chapter on **Housing** sets out how the Local Plan will respond to a changing population, building new homes to widen choice and ensure access to affordable, good quality housing as well as protecting existing stock. The Council's approach to securing **Affordable Housing** and seeking a minimum level of 35 per cent delivery is set within the context of the London Plan. Priorities for ensuring an appropriate **Housing Mix** emphasise that in delivering against priorities for 2 bed and 3 bed homes that the smallest 2 bedroom property provides a minimum of 4 bed spaces in accordance with London Plan residential space standards. In terms of protecting family homes the **Residential Conversions** policy restricts conversions to areas around town centres or areas with good public transport accessibility. In terms of **Specialist Housing** the Local Plan highlights support for helping people with social care and health support needs to live independently as well as providing tenure choice. This policy also sets out a response to the increased pressures of student accommodation and large-scale purpose built shared accommodation as well as Houses in Multiple Occupation. To reduce demands on pressures for new build, policy on ensuring the **Efficient Use of the Housing Stock** resists loss of existing homes and set out how the impact of short term holiday lets is to be managed. New policy on **Meeting Other Housing Needs** sets out approach to widening choice in terms of Build to Rent and Self-Build housing. Policy on **Gypsies, Travellers and Travelling**

Showpeople highlights that there is no identified need for plots and pitches within Barnet and sets out how any proposals will be considered.

- *In terms of Affordable Housing there is reference in Policy HOU01 to clarify the approach on Vacant Building Credit applications and provision for keyworker housing on Government land. A further modification will be made to reflect the Council's approach on First Homes as an element of affordable housing. The policy on Housing Mix has been revised to emphasise number of bedspaces in terms of size priorities and that these priorities are subject to periodic review. The supporting text emphasises the opportunities for downsizing and that well designed 2 bed properties with space for 4 persons can be family homes. Policy on Residential Conversions widened to cover redevelopment of Larger Homes and highlight safeguards in roads largely characterised by houses. More detailed requirements for student accommodation and managing HMOs to prevent harmful concentrations of such a use have been added to the Housing Chapter as has policy on Residential Care Homes (previously set out in Community, Health and Wellbeing).*
- **Character, Design and Heritage** sets parameters for managing change ensuring positive benefits of growth and that Barnet does not lose the qualities that attract people to live, work and visit the Borough. The Council's main design requirements for development are set out in **Promoting High Quality Design and Sustainable and Inclusive Design, Amenity Space and Landscaping**. Minimum requirements for residential space, internal layout and design as well as outdoor amenity space are clearly set out. Policy on **Public Realm** emphasises the importance of development contributing to sense of place, community cohesiveness, health and wellbeing. In order to manage and respond to pressures for very tall buildings (15 storeys or more) the **Tall Buildings** policy sets out those strategic locations where tall and very tall buildings may be appropriate. A new SPD on Building Heights will set out the parameters for tall and very tall buildings within these locations. Policies on **Extensions** and **Basements** have been introduced to guide proposals that exceed permitted development rights. Policy on **Advertisements** helps to better manage their impact on character and residential amenity.
- *Policy on promoting High Quality Design sets out requirements for Design Codes for small sites and further emphasises the Healthy Streets Approach. Our approach to Public Realm highlights the use of town centre public realm strategies for addressing individual locations. In terms of Tall Buildings the supporting text and policy have been revised and strengthened to set out further design considerations for buildings of height and to clarify thresholds for very tall buildings. The 28 storey maximum height threshold proved to be unjustifiable and has been removed. Barnet's definition of a Tall Building and identification of strategic locations where tall buildings may be appropriate does not mean that all buildings up to 8 storeys or to a height of 26 metres are acceptable in these locations or elsewhere in the Borough. Such proposals will be assessed in the context of other planning policies, in particular Policy CDH01 – Promoting High Quality Design, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area. Heritage policy and supporting text revised to address Historic England's concerns about it being consistent with the NPPF.*
- Chapter on **Town Centres** sets out how these locations will remain the focus for inward investment, vitality and viability despite retail change. The **Vibrant Town Centres** policy sets out the role that these locations play in delivering growth and

improving their overall offer. Policy emphasises importance of protecting local parades of shops to ensure services are available for less mobile residents. The associations with excessive noise, odours, traffic and anti-social behaviour makes the clustering of uses such as hot food takeaways, shisha bars, betting shops and money lenders a problem across the Borough. Having greater control over the location and numbers of such uses will have positive benefits for health and wellbeing. Similarly, policy on the **Night Time Economy** enables the Local Plan to ensure that this growing sector is successful and contributes to safer and more welcoming town centres for visitors as well as residents.

- *Greater emphasise in policies on how Council will promote vitality and viability of town centres and enable their economic recovery by managing them as the priority location for commercial, business and service uses with retail functions safeguarded in primary frontages. Local parades enhanced and protected with stronger safeguarding for local community shops. Agent of Change principle emphasised in order to protect residential amenity from new development and to protect existing businesses from residential development introduced nearby. Adult Gaming Centres and Amusement Arcades added to the uses we need to more effectively manage in town centres.*
- **Community Uses, Health and Wellbeing** sets out how Local Plan can help deliver new social infrastructure in more accessible locations while promoting healthier lives for residents. Within policy on **Community Infrastructure** there is a greater focus on town centre locations for multi-purpose community hubs. Robust justification is required for other locations. **Promoting health and wellbeing** is a consistent theme across the Local Plan and Policy CHW02 signposts specific policies which contribute to positive benefits for Barnet's residents, workers and visitors. In **Making Barnet a Safer Place** the Local Plan sets out the measures that the planning system can take to improve community safety. **Public Houses** also contribute to community wellbeing. In response to the loss of such assets the Local Plan seeks to better safeguard them.
- *Supporting text in this Chapter revised to reflect new Infrastructure Delivery Plan. Clarifications added on requirements from development that increases demand for community facilities and services to make contributions towards existing facilities as well as new and accessible facilities. Support added for proposals that as part of visitor economy help celebrate the culture and history of Barnet. Policy on Promoting Health and Wellbeing revised to highlight that to recover, restore and thrive and make positive difference to health and wellbeing post COVID19 the Council will promote creation of healthy environments as safe, accessible, sustainable and high-quality places which improve physical and mental health and reduce health inequalities.*
- **Economy** sets out how enterprises will be supported and access to employment opportunities secured. A more robust position on protecting employment space in particular for offices, as well as promoting new job opportunities is set out. Policy on **Affordable Workspace** will ensure that new employment development will contribute to floorspace in a variety of formats to support start-ups and SMEs. Requirements on S106 contributions from major development are more clearly expressed in the **Local Jobs, Skills and Training** policy.
- *Supporting text revised to outline impact of Use Classes Order changes to B1 offices. Highlights that any proposals including co-location of residential uses within*

designated employment areas should be employment led. Agent of Change Principle used in favour of existing and proposed employment uses.

- **Environment and Climate Change** sets out how Council is seeking to mitigate climate change and improve access to, as well as to the quality of, parks and open spaces. Requirements for reducing carbon emissions from new development are clarified in policy on **Mitigating Climate Change** while requirements on air and noise quality as well as water efficiency, flood risk and sustainable urban drainage systems are set out in **Environmental Considerations**. The **Dealing with Waste** policy provides linkage with the North London Waste Plan and sets out proposal for utilising additional capacity at an existing waste management facility at Scratchwood Quarry. Policy on **Barnet's Parks and Open Spaces** emphasises improving the quality of spaces of low quality and low amenity as identified in the Parks and Open Spaces Strategy. Barnet's **Green Belt and Metropolitan Open Land** policy continues the robust protection of this land in accordance with NPPF and the London Plan. Policy on **Biodiversity** sets out Local Plan requirements from development that has an impact on biodiversity and habitat quality.
- *Supporting text revised with regard to existing building stock and embodied carbon. Where possible the reuse of existing buildings should therefore be considered. Clarifies requirements for carbon reductions beyond Part L of Building Regulations from energy efficiency measures alone to reduce energy demand as far as possible. New policy on Water Management covering Water Infrastructure, Water Courses, Surface Water Management and Flood Risk. Further clarification that Metropolitan Open Land is protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt and the London Plan. Requirements for biodiversity net gain are clarified through on-site measures and by contribution to local biodiversity improvements.*
- **Transport and Communications** sets out how the Local Plan is seeking to improve connectivity in terms of sustainable and active travel as well as digital communication. Policy on **Sustainable and Active Travel** supports an improved transport network where dependency on the car is much reduced and advocates application of the Healthy Streets Approach in making non car travel more attractive. The **Transport Infrastructure** policy sets out Local Plan expectations for new or improved stations as well as West London Orbital and Crossrail 2 at New Southgate. A robust justification for setting residential parking standards that better reflect local public transport accessibility in the context of Outer London is set out in the **Parking Management** policy. Zero car parking may be appropriate in areas with high Public Transport Accessibility Levels. Policy on **Digital Communication and Connectivity** emphasises the Council's aim to facilitate high speed broadband and clarifies requirements on the installation of telecommunications equipment.
- *Policies have been revised to reflect the Long Term Transport Strategy, highlighting interventions such as ensuring good connections to bus stops, stations, and strategic, local walking and cycling networks. It's stronger on requiring developments to provide healthy, safe attractive walking and cycling environments. There is a greater focus on enabling more sustainable mode choice, highlighting that active travel benefits health while having the lowest environmental impacts. Requirements added that Travel Plans demonstrate how development is contributing to Mayor's 72% target for trips by sustainable modes. Highlights reducing dominance of car around station through supporting reduced parking spaces, implementing or expanding parking controls and*

enhancing public realm to encourage cycling and walking. In terms of residential car parking, following Directions by the Secretary of State, the London Plan has moved closer to Barnet's parking standards. Barnet Parking Study justifies slight variations with London Plan. Further clarification is provided about the Council's process for establishing new Controlled Parking Zones.

- **Delivering the Local Plan** explains mechanisms for ensuring the infrastructure to support growth is secured.
- *Updated to reflect progress on Community Infrastructure Levy Charging Schedule which has been submitted for examination and to outline role of the annual Infrastructure Funding Statement in identifying projects that will receive CIL funding. Outlines that CIL helps deliver infrastructure to support key objectives of the Local Plan. It also highlights that changes to the CIL regulations in 2019 removed Section 106 pooling restrictions and the requirement for a Regulation 123 list, meaning that both Section 106 and CIL contributions can now be used to fund the same piece of infrastructure. In practice however, to be in accordance with the planning obligations tests, s106 will continue to be used to address site specific impacts, and CIL will be used for more strategic infrastructure.*

Publication Local Plan – Schedule of Site Proposals

- The **Schedule of Proposals** in Annex 1 sets out 66 Local Plan policy compliant site proposals from across Barnet. These proposals all contribute to the delivery of the Local Plan's strategy and spatial vision and are also set out in a summary table within Annex 1.
 - Proposals have been drawn from a number of sources including existing planning documents such as SPDs and Town Centre Frameworks. Inclusion in the Local Plan of these sites which have already gone through a process of public consultation elevates their planning status.
 - Another source has been the Call for Sites information gathering exercise. The Council has conducted 4 rounds of Call for Sites since 2009.
 - Sites have come forward as proposals following a robust assessment process ensuring that constraints such as flood risk or location in a conservation area are factored into what is set out in the Local Plan.
 - Site proposals help to deliver the Local Plan. They do not preclude new regeneration initiatives that are consistent with the new policy framework. As the Local Plan progresses a number of sites will obtain planning consent. It is most likely that as a consequence of such consent they will be deleted as site proposals in the emerging Local Plan.

Annex 1 has been reformatted with the addition of satellite maps and site photographs. Proposals have been revised to provide further justification for identifying the proposal in the Local Plan and set out more specific information on planning designations such as Conservation Areas and Green Belt / MOL as well as relevant planning applications. Proposals revised to reflect the Strategic Flood Risk Assessment Stage 2. Also updated to reflect progress in planning applications and appeals. Reflects significant changes in Use Classes Order 2020. This is particularly relevant to town centre sites.

2. REASONS FOR RECOMMENDATIONS

- 2.1 Failure to progress a review of the Local Plan (adopted in 2012) will delay the delivery of sustainable development and infrastructure, while reducing the Council's power to protect and enhance the Borough through planning decision making. The NPPF states that Local Plans should be reviewed at least every five years in order to reflect changing circumstances locally or changes to national policy. The Council's ability to shape the future of the Borough and manage range will be severely compromised by not having an up to date planning policy framework. The Council and Barnet residents and businesses will have less of a say on the future of the Borough as important planning decisions are made by the Mayor of London and the Planning Inspectorate in an incremental fashion.
- 2.2 The absence of an up to date Local Plan and any unwillingness to replace it will reduce opportunities for private inward investment as well as funding support from the Government and Mayor of London, such as the Good Growth Fund and Housebuilding Capacity Fund.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 The previous version of the Local Plan at Reg 18 stage set out and justified the Council's preferred policy approach. It also set out reasons why it is considered that there are no realistic alternatives.

4. POST DECISION IMPLEMENTATION

- 4.1 Following approval of the Reg 19 document the Local Plan will be subject to a six week period of public consultation. The next stages are set out below
- Reg 19: Publication of Local Plan and Consultation – Autumn 2020
 - Reg 22: Submission – Autumn 2021
 - Reg 24: Examination in Public – Spring 2022
 - Reg 26: Adoption – Autumn 2022.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 The Local Plan is the statutory spatial expression of corporate strategies including the Corporate Plan, Growth Strategy, Housing Strategy, Long Term Transport Strategy and Health and Wellbeing Strategy. It will deliver against the four main priorities of Barnet's Corporate Plan 2021 to 20215 as follows :

- Clean, safe and well-run – a place where streets are clean and anti-social behaviour is dealt with so that residents feel safe -
 - In keeping Barnet clean the Local Plan addresses environmental problems that arise from the clustering of uses such as hot food takeaways, shisha bars and betting shops;

- Local Plan has specific policy on Making Barnet a Safer Place. The use of Designing out Crime is highlighted throughout the Local Plan and reference is made to the Secured Resilient Design Tool for places where crowds may congregate.
- The Local Plan utilises Healthy Streets Indicators such as good street lighting to safely promote walking, cycling and use of public transport;
- Family friendly – enabling opportunities for our children and young people to achieve their best -
 - Ensuring we are a family friendly borough is reflected throughout the Local Plan in particular policies on Mitigating Climate Change, Housing Mix and Barnet’s Parks and Open Spaces as well as Sustainable and Active Travel.
 - In ensuring the needs of children are considered the Local Plan seeks to tackle childhood obesity by not allowing any new hot food takeaways within 400 metres of a school or youth centre. It also seeks to deliver new high quality homes that meet space standards;
 - Policies on Housing support accommodation for vulnerable people helping them to live independent lives;
 - Specific policy on Local Jobs, Skills and Training sets out how the Local Plan will help people access the employment opportunities generated by growth; and
 - The Infrastructure Delivery Plan which supports the Local Plan together with contributions from development through S106 and Community Infrastructure Levy helps to ensure the Council has good schools and enough school places so all children have access to a great education.
- Healthy – a place with fantastic facilities for all ages, enabling people to live happy and healthy lives -
 - Policy on promoting health and wellbeing cross-refers to a range of policies supporting healthier lifestyles including Sustainable and Active Travel as well as protecting public houses in recognition of their contribution to community cohesiveness;
 - Creating a sense of place that encourages social interaction and physical activity is an aim of the policy on Public Realm. Making public realm more accessible and welcoming can help, as a consequence of development, create or improve public space that can serve as a venue for celebrating Barnet’s diversity and tackle anti-social behaviour and environmental crime.
- Thriving – a place fit for the future, where all benefit from improved sustainable infrastructure, housing and economic opportunity -
 - The Vibrant Local Economy and Affordable Workspace policies help to safeguard existing employment floorspace and secure new affordable floorspace from development. Utilising vacant space in town centres for meanwhile uses is supported when it contributes to vitality and viability;
 - Policies in the Housing and Character, Design and Heritage Chapters seek to ensure access to decent quality affordable housing;
 - Chapter on Delivering the Local Plan sets out mechanisms for securing funding from growth to invest in social infrastructure to support a growing population. The

Infrastructure Delivery Plan sets out the needs, gaps and deficits in provision, along with the costs of providing the infrastructure;

- The Local Plan approach to delivering sustainable growth demonstrates responsible delivery of Barnet's major regeneration schemes including transformation at Brent Cross Cricklewood and growth projects such as Edgware Town Centre creating better places to live and work, whilst protecting and enhancing the Borough, in particular it's suburban qualities.

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

5.2.1 The cost of producing and consulting on the Local Plan is included in the Re contract but the cost of examination in public and any associated legal costs is excluded and will need to be funded by the Council in late 2021-22 and early 2022-23 (estimated budget is £150k to allow for uncertainties). The costs associated with preparing a North London Waste Plan were also excluded from the contract and have been funded each year accordingly, a small budget (up to £10k) for adoption costs in 2021-22 is required.

The Local Plan is supported by an extensive evidence base, the requirements of which are subject to change. Most of the evidence required was included within the Re Core Contract. Although, when embarking on the review of the plan in 2017 the Council agreed to fund specific additional evidence requirements that were agreed to have not been specified in the original Re contract. This includes the Green Belt and Metropolitan Open Land Study, Residential Conversions Study, Car Parking Study, and a Strategic Transport Assessment, all of which have been completed to date. Although not a specific evidence requirement for the Local Plan, a Biodiversity Action Plan is being produced by the Council. A budget of £40k will be required to unlock preparation of Barnet's Biodiversity Action Plan in late 2021-22.

5.2.2 The cost of consulting on the Local Plan is met by Re. The Council's Statement of Community Involvement (SCI) (October 2018) and the COVID19 SCI Addendum (September 2020) sets out consultation requirements for the Local Plan. The cost of any additions to these requirements will need to be met by the Council, no additional costs have been identified to date but an allowance might be required for uncertainties.

5.2.3 The Local Plan promotes a number of sites that have been put forward through the Council Assets Disposal Programme. These sites have predominantly provided community uses. Through the Local Plan the Council can ensure that any future redevelopment is policy compliant and benefits from community engagement prior to any future planning application.

5.3 Social Value

5.3.1 The Local Plan will secure a range of social, economic and environmental benefits. These are set out within the body of this Report and detailed within the Sustainability Appraisal of the Reg 19 document.

5.4 Legal and Constitutional References

5.4.1 The Planning & Compulsory Purchase Act 2004, in particular Regulation 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, provides guidance on the preparation and adoption of Local Plan documents. This includes public

availability under Regulation 35. Upon adoption the Local Plan becomes a statutory Development Plan Document that forms part of Barnet's formal planning policy framework.

5.4.2 Under the Council's Constitution, Article 7 - Item 7.5 (Responsibility for Functions) sets out that the Policy and Resources Committee is responsible for the overall strategic direction of the Council including responsibility for Local Plans.

5.5 Risk Management

5.5.1 The Local Plan process faces a number of risks and these are managed by the Council's Strategic Planning Operations Board which meets monthly. The major identified risks are:

- the Local Plan being found unsound by a Planning Inspector. This can be mitigated by use of Planning Advisory Service (PAS) Local Plan Route Mapper and Toolkit for use when undertaking a review and update of local plan policies which includes guidance and checklists for ensuring soundness, legal compliance and a robust evidence base supporting the Local Plan;
- a failure to meet the legal requirements of duty to cooperate with neighbouring authorities and statutory agencies such as Historic England and the Environment Agency is another major risk. Through early and ongoing engagement including working with the West London Alliance this can be mitigated. As evidence that engagement is underway the Council has produced a Duty to Co-operate Statement;
- another significant risk is that the GLA consider the Local Plan not to be in general conformity with the new London Plan. The Local Plan has been produced to reflect the London Plan and the Council has ensured ongoing engagement with the GLA's London Plan team;
- a lack of political and local support for the Local Plan can be addressed through the cross-party Members Advisory Group who act as a sounding board for issues that the Local Plan should address.

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 Relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

5.6.3 The Local Plan, once adopted, has the potential to impact on all of those who live, work and visit the Borough. An Equalities Impact Assessment (EQIA) (see Appendix C) has been undertaken as part of an Integrated Impact Assessment of the Local Plan. Policies contained within the Reg 19 document could potentially have significant effects on those individuals who share one or more of the nine protected characteristics identified under

the Equalities Act 2010, particularly those which relates to housing, transport, employment, environment and inclusive design.

5.6.4 The EqIA identified that many of the policies would have a positive effect across equalities groups particularly those which relate to housing (e.g. the provision of affordable housing and specialist housing), high quality design (e.g. emphasis on inclusive design will be beneficial to disabled people), the promotion of employment and training opportunities to help reduce poverty and improvements within the built environment to make it more inclusive. However, the EqIA did note that there is potential for conflict in protecting heritage assets and making alterations to improve disabled access, e.g. ramps / lifts may not be considered appropriate in some listed buildings. Where significant effects are identified, appropriate mitigation strategies need to be put in place to avoid or reduce impacts.

5.7 Corporate Parenting

5.7.1 Not applicable.

5.8 Consultation and Engagement

5.8.1 Early engagement on the Local Plan commenced in late 2017 with a series of workshops with community representatives, Councillors and Chief Officers. This helped create the vision and objectives for the Local Plan. The Council undertook extensive engagement on the Preferred Approach in early 2020 and this feedback has informed the Publication Local Plan.

5.8.2 The Local Plan is now at a critical stage where representations are required to focus on the 'soundness of the plan' as set out in the NPPF. To be sound the Plan must be

- Positively prepared – providing a strategy which seeks to meet Barnet's objectively assessed needs;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters and
- Consistent with national policy.

5.8.3 Representations on the soundness of the (Reg 19) Publication Local Plan will be submitted to the Planning Inspectorate for the Examination in Public along with the Local Plan and supporting evidence.

5.8.4 The Reg 19 Local Plan document will undergo public consultation for a period of 6 weeks. Consultation will be carried out in accordance with the 2018 Statement of Community Involvement (SCI) and 2020 SCI COVID19 Addendum. A Reg 19 Consultation Strategy sets out more detail on engagement activities, including working with boroughwide groups under the protected characteristics of the Equalities Act

5.8.5 To help assist the Reg 19 consultation the Council will also provide a summary version of the 52 policies in the Local Plan and an online representations form that helps respondents address the 'test of soundness'.

5.9 Insight

5.9.1 N/A

6. BACKGROUND PAPERS

- 6.1 Policy & Resources Committee - 6th January 2020 (Item 13) – Barnet’s Local Plan – Preferred Approach - (Reg 18)
<https://barnet.moderngov.co.uk/documents/s56947/Reg%2018%20PR%20Committee%20Report2.pdf>
- 6.2 Policy and Resources Committee – 24th September 2020 (Item 11) - Barnet’s Statement of Community Involvement – COVID 19 Addendum
<https://barnet.moderngov.co.uk/documents/s60203/Barnets%20Statement%20of%20Community%20Involvement%20-%20COVID%2019%20Addendum.pdf>
- 6.3 Policy and Resources Committee – 8th February 2020 (item7) - Review of Community Infrastructure Levy (CIL) Eligibility Criteria and Guidance
<https://barnet.moderngov.co.uk/documents/s63172/Review%20of%20Community%20Infrastructure%20Levy%20CIL%20Eligibility%20Criteria%20and%20Guidance.pdf>
- 6.4 Local Plan Integrated Impact Assessment – Sustainability Appraisal, Equalities Impact Assessment and Health Impact Assessment
- 6.5 Local Plan Reg 18 Consultation Statement
- 6.6 Local Plan Reg 19 Engagement Strategy
- 6.7 Note from Planning Inspectorate Advisory Visit – April 2021.

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Barnet Draft Local Plan (Reg 19) 2021 to 2036

June 2021

Foreword

Barnet is London's most populous borough. Over 400,000 people live in Barnet. The Borough's excellent schools, vibrant town centres, accessible green spaces and diverse communities all contribute to a popular and family friendly place where people choose to live.

Barnet's popularity means that it will continue to grow. Ensuring that the Borough retains the qualities that make it attractive while also accommodating the needs of future generations for new homes, jobs and infrastructure is a role for the new Barnet Local Plan. We are planning a fit-for-purpose planning framework for the Borough with a Plan that looks ahead to 2036.

The shadow cast by the COVID19 pandemic and the rapid changes to how people live, learn, work and travel has had a major impact on the qualities that attract people, and families in particular, to live and stay in the Borough. Many of these changes have wide-ranging and long-reaching consequences and it is likely that many of these could remain in the medium to long term, extending some way into the lifetime of this Plan. It's important to have a Plan that is sufficiently flexible, enabling us to adapt to these challenges and help Build Back Better.

Despite the economic challenges of the past decade the Council's 2012 Local Plan has successfully supported sustainable growth in Colindale and Mill Hill East as well as the renewal and regeneration of large housing estates such as Stonegrove-Spur Road, Dollis Valley, Grahame Park and West Hendon. Added to this is Brent Cross, Barnet's largest and most significant area of regeneration. This reflects the Council's work to deliver against challenging housing targets which continue to increase. To accommodate Barnet's population growth and help younger generations get on the housing ladder at least 35,500 new homes need to be built by 2036.

Future growth needs to take a wider focus. Using the Local Plan to broaden the approach to growth, taking advantage of development opportunities within Barnet's town centres helping them to thrive by making more attractive family friendly destinations and areas where transport improvements such as the West London Orbital Line and new cycling and walking routes are planned. The Plan will also respond to technological change such as electric cars and regulatory measures to reduce environmental pollution, helping to revitalise our major thoroughfares as places to live and work.

Through the Local Plan the Council will ensure that the positive benefits of growth and investment are shared making the Borough more socially and economically inclusive as well as environmentally sustainable.

Through working with residents and business we will ensure that Barnet's new Local Plan helps the Borough to make a broad and lasting recovery.

Consultation Details

The Council is in the process of reviewing and updating the Brough's planning policies in a document, known as the Local Plan. It forms a 15-year strategy which emphasises Barnet's many strengths as a place to live, work and visit. The Local Plan sets out a vision for how the Borough will change as a place over the next 15 years.

The Council welcomes your input on this draft Local Plan which will have an impact on the people who live, work, operate a business or visit the Borough as well as future generations.

This document sets out the Council's Publication Local Plan which will be submitted to the Planning Inspectorate for Independent Examination. The Council is inviting comments on the soundness of the Local Plan. Plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy. Further details on 'soundness' are set out in the NPPF (para 35).

Public consultation on the draft Local Plan (formally known as Reg 19) will take place from **xxx 2021 to xxx 2021**. Following engagement on this stage, we will submit the Plan, together with supporting evidence and all representations received on the Reg 19, to a Government Planning Inspector for Independent Examination.

The draft Local Plan and accompanying documents are available to view at:

- Planning reception at 2 Bristol Avenue, Colindale, London NW9 4EW. (Monday, Wednesday and Friday, 9am– 1pm)
- local libraries (details and opening hours available at <https://www.barnet.gov.uk/libraries/library-opening-times>)
- online at <https://engage.barnet.gov.uk/>

Any comments (known as representations) should be made using a Representation Form available online at the above locations.

You can have your say by using the Representation Form clearly stating the nature of your comments and the changes you are seeking. This can be emailed via : forward.planning@barnet.gov.uk or by completing and returning the form by post to:

Planning Policy Team at 2 Bristol Avenue, Colindale, London, NW9 4EW

Further information is also available from the team on 020 8359 3000

Representations about the Local Plan must be submitted by one of the methods specified above no later than midnight on **xxxx 2021**

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Local Plan List of Policies

BARNET'S VISION & OBJECTIVES

Policy BSS01 Barnet's Spatial Strategy

GROWTH & SPATIAL STRATEGY

Policy GSS01 Delivering Sustainable Growth
 Policy GSS02 Brent Cross Growth Area
 Policy GSS03 Brent Cross West Growth Area
 Policy GSS04 Cricklewood Growth Area
 Policy GSS05 Edgware Growth Area
 Policy GSS06 Colindale Growth Area
 Policy GSS07 Mill Hill East
 Policy GSS08 Barnet's District Town Centres
 Policy GSS09 Existing & Major New Transport Infrastructure
 Policy GSS10 Estate Renewal
 Policy GSS11 Major Thoroughfares
 Policy GSS12 Redevelopment of Car Parks
 Policy GSS13 Strategic Parks and Recreation

HOUSING

Policy HOU01 Affordable Housing
 Policy HOU02 Housing Mix
 Policy HOU03 Residential Conversions and Redevelopment
 Policy HOU04 Specialist Housing
 Policy HOU05 Efficient Use of Barnet's Housing Stock
 Policy HOU06 Meeting Other Housing Needs
 Policy HOU07 Gypsies, Travellers and Travelling Showpeople

CHARACTER DESIGN & HERITAGE

Policy CDH01 Promoting High Quality Design
 Policy CDH02 Sustainable and Inclusive Design
 Policy CDH03 Public Realm
 Policy CDH04 Tall Buildings
 Policy CDH05 Extensions
 Policy CDH06 Basements
 Policy CDH07 Amenity Space and Landscaping
 Policy CDH08 Barnet's Heritage
 Policy CDH09 Advertisements

TOWN CENTRES

Policy TOW01 Vibrant Town Centres
 Policy TOW02 Development principles in Barnet's Town Centres, Local Centres and Parades
 Policy TOW03 Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars
 Policy TOW04 Night –Time Economy

COMMUNITY USES, HEALTH AND WELLBEING

Policy CHW01	Community Infrastructure
Policy CHW02	Promoting health and wellbeing
Policy CHW03	Making Barnet a safer place
Policy CHW04	Protecting Public Houses

ECONOMY

Policy ECY01	A Vibrant Local Economy
Policy ECY02	Affordable Workspace
Policy ECY03	Local Jobs, Skills and Training

ENVIRONMENT & CLIMATE CHANGE

Policy ECC01	Mitigating Climate Change
Policy ECC02	Environmental Considerations
Policy ECC02A	Water Management
Policy ECC03	Dealing with waste
Policy ECC04	Barnet's Parks and Open Spaces
Policy ECC05	Green Belt and Metropolitan Open Land
Policy ECC06	Biodiversity

TRANSPORT & COMMUNICATIONS

Policy TRC01	Sustainable and Active Travel
Policy TRC02	Transport Infrastructure
Policy TRC03	Parking management
Policy TRC04	Digital Communication and Connectivity

APPENDICES

Appendix A - List of Evidence

Appendix B - Acronym Buster and Glossary

Appendix C – Replacement of Local Plan Policies

ANNEX 1 – SCHEDULE OF PROPOSALS

1 Chapter 1 – Introduction

1.1 A New Local Plan for Barnet

- 1.1.1 The Council is progressing a new Local Plan. The existing Local Plan (comprising Core Strategy and Development Management Policies Development Plan Documents) was adopted in 2012. Appendix C sets out how the 2012 Local Plan policies are being replaced. Policies in Local Plans should be reviewed at least once every five years to check whether they need to be updated on the basis of changing circumstances locally or relevant changes in national policy. Therefore, these documents now need to be reviewed in full and the Local Plan updated to ensure that the Borough continues to grow and develop to provide a thriving place for people to live, work and visit.
- 1.1.2 The new Local Plan also needs to take account of new national planning policy in the form of the National Planning Policy Framework (NPPF) and a new London Plan (2021).
- 1.1.3 The new Local Plan establishes the Council's vision for growth and development in Barnet over a 15 year period (2021-2036) and together with the adopted documents shown in Figure 1, forms the Development Plan for Barnet. The Development Plan is the basis upon which planning applications will be determined unless there are material planning considerations that indicate otherwise. Where relevant to assessing an application, all policies in the Local Plan need to be considered and tensions between different policies reconciled in reaching a balanced agreement.
- 1.1.4 Table 1 sets out the regulatory stages and timetable for planmaking. This document is known as Barnet's Publication Local Plan. This version of the Local Plan is a draft document specifically produced to enable representations to be made on the draft plan that will then be considered by an independent Inspector at the examination stage. It takes account of comments received on the previous stage of consultation: Preferred Approach (January 2020 to March 2020). It is the version that the Council seeks to adopt as the framework for decision making on planning. The Council recognises however that it is possible that responses to this regulatory stage will result in further proposed changes to the Plan as part of the Examination in Public.
- 1.1.5 At this stage of the Plan comments should be related to the 'test of soundness' as set out in the NPPF. These are whether the Plan is "sound" in respect of being:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

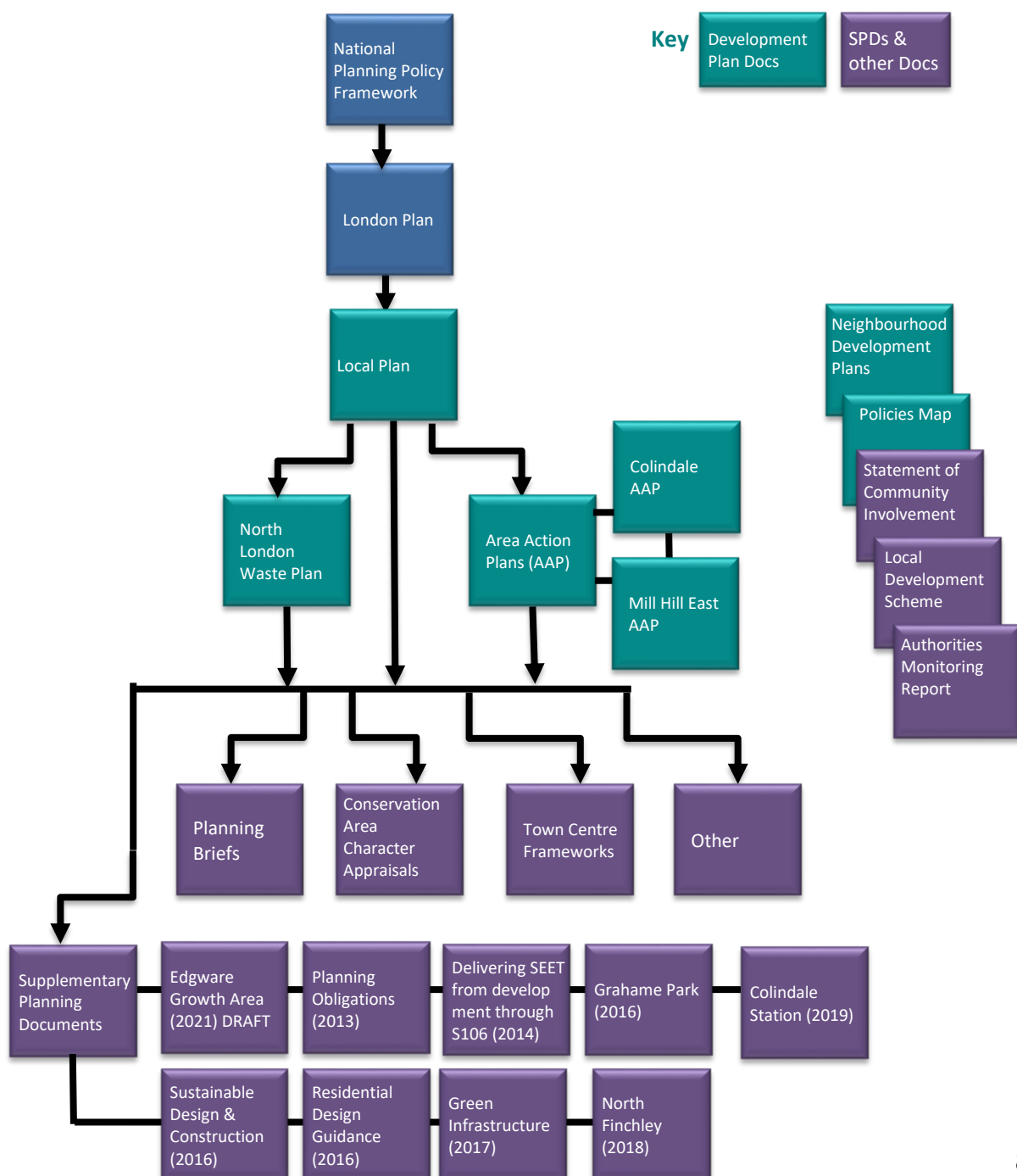
Justified – an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the NPPF.

1.1.6 All representations received on Barnet’s Local Plan Publication (Reg 19) will be summarised and collated within a consultation statement to be considered by the appointed Inspector alongside the Local Plan. Respondents will be identifiable by name. Any other personal information will be processed in accordance with the General Data Protection Regulations 2018.

Figure 1 - Barnet’s Development Plan



Regulatory Stages and Timetable					
Evidence gathering and pre-preparation stage (Including consulting on sustainability reports where applicable)	Reg 18: Preparation of Local Plan and Consultation Opportunity for interested parties and statutory consultees to be involved at an early stage.	Reg 19: Publication of Local Plan for representation on soundness issues (NPPF para 35) The Council publishes the draft plan. There follows a period of at least 6 weeks for making representations.	Reg 22: Submission The Council submits the Local Plan to the Secretary of State with representations received.	Reg 24: Examination in Public Conducted by independent Planning Inspector who will consider representations made at Reg 22 stage.	Reg 26: Adoption Subject to outcome of examination, including consultation on main modifications the Council formally adopt the plan.
Summer 2017-ongoing	Winter 2020	Summer 2021	Autumn 2021	Spring 2022	Autumn 2022

Table 1 – Local Plan Timetable

1.2 Barnet’s Development Plan

1.2.1 Barnet’s Local Plan (2021-2036) provides a positive strategy for delivering the Council’s priorities through sustainable development. It identifies areas for housing and employment growth and reflects the benefits of major investment in infrastructure that projects such as the West London Orbital will bring to the Borough. It will also assist in the delivery of other Council Plans and Strategies (as set out in Figure 2). This includes the Growth Strategy which sets out where the Council will focus its interventions to support delivery of development and regeneration. These plans and strategies provide a robust planning framework against which the aspirations of the Council can be successfully delivered.

Figure 2 - Relationship of Local Plan to Council Strategies



1.2.2 The Local Plan sets out the detailed policy approach for the Borough. It sets out:

- The challenges faced in Barnet and the Council's Vision and Objectives for growth and development over the plan period.
- Locations for housing and employment growth
- Policies to ensure that housing and employment space meets need and is affordable.
- Policies to ensure that development is sustainable and built to a high quality of design.
- Policies to maintain the vibrancy and vitality of our commercial centres and help support recovery and renewal from COVID19
- Policies to maintain environmental quality.
- Policies to support a sustainable transport infrastructure network.
- Policies to support social and community infrastructure

1.2.3 The Policies Map shows the main policy designations such as Green Belt, Metropolitan Open Land, conservation areas, employment areas, town centres and open spaces as well as the site proposals that are highlighted in Annex 1.

1.3 **London Plan and the National Planning Policy Framework (NPPF)**

1.3.1 Barnet's Local Plan has been prepared within the context of the NPPF (2019), which states a strong presumption in favour of sustainable development. In relation to plan-making, the NPPF requires Local Plans to positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change (NPPF para 11).

1.3.2 Barnet's Local Plan has also been prepared to be in general conformity with the policies in the London Plan (2021), The London Plan sets housing targets that boroughs should deliver as a minimum and identifies locations for future growth along with strategic policies for delivering the identified growth.

1.3.3 The following Barnet areas are designated (or were previously designated in the case of Mill Hill East) in the London Plan.

- Brent Cross Cricklewood – The London Plan designates Brent Cross Cricklewood as an Opportunity Area. The planning framework for Brent Cross Cricklewood is set out in the Area Development Framework adopted as Supplementary Planning Guidance in December 2005. Formerly a Regeneration Area Brent Cross / Cricklewood is now designated as three individual Growth Areas in Local Plan: Brent Cross, Brent Cross West / Staples Corner and Cricklewood Town Centre.

- Colindale-Burnt Oak – The London Plan designates Colindale as an Opportunity Area. The planning framework for Colindale is set out in the Area Action Plan adopted in March 2010. Unimplemented allocations in the AAP remain part of the Local Plan Schedule of Proposals. Formerly a Regeneration Area, Colindale is now designated as a Growth Area in the Local Plan.
- New Southgate – The London Plan designates New Southgate as an Opportunity Area. A planning framework will be produced jointly with the GLA, LB Enfield and LB Haringey that will further assess the development potential of this area.
- Mill Hill East – The planning framework for Mill Hill East is set out in the Area Action Plan adopted in January 2009. Unimplemented allocations in the AAP remain part of the Local Plan. Formerly an Area for Intensification, Mill Hill East is now identified as an area for good suburban growth in the Local Plan.

1.4 Evidence Base

- 1.4.1 National planning policy requires that Local Plans should be based on up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the Borough. An extensive evidence base has informed the preparation of this Local Plan. This includes technical studies covering a range of topics such as housing need and delivery, employment land, transport, Green Belt and Metropolitan Open Land, infrastructure requirements and flood risk. A full list of technical evidence base documents is set out at Appendix A. Reference is also made here to data and information the Council has been collecting to support its response to COVID19.
- 1.4.2 In addition, a combined Sustainability Appraisal (SA), Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA) of the Barnet Local Plan (2021-2036) has also been undertaken. This is known as the Integrated Impact Assessment (IIA). The IIA is published alongside the Local Plan.
- 1.4.3 The SA component of the IIA assesses Local Plan policies and site proposals against a range of social, environmental and economic indicators and helps to identify all the likely significant effects. The SA advises on ways in which any adverse effects could be avoided, reduced or mitigated or how any positive effects could be maximised. This helps to ensure that the emerging policies and site proposals promote sustainable development.
- 1.4.4 Another element of the IIA is the EqIA which ensures that the policies in the Barnet Local Plan do not discriminate in any form (age, sex, race, disability, religion, sexual orientation, marriage/civil partnership, gender reassignment).
- 1.4.5 The HIA assesses the impact which Local Plan policies will have on the health of Barnet's population.

1.4.6 The Local Plan is also screened to ascertain its impact on sites of European importance for habitats or species (Habitats Regulation Assessment (HRA)). Where the potential for likely significant effects cannot be excluded an appropriate assessment of the implications is required.

1.5 Community Engagement and Duty to Co-operate

1.5.1 Local Plans are subject to a rigorous statutory process involving several stages of public consultation. These stages of engagement from visioning workshops in 2017, through several rounds of public consultation up to participation in the examination in public in 2022 will help shape the Local Plan. Further detail on how we will consult and what you have told us so far is set out in the Local Plan Consultation Report.

1.5.2 As required by the Localism Act 2011 and the 'duty to co-operate', the Council is committed to co-operating with a wide range of organisations including neighbouring authorities, infrastructure providers and key organisations on strategic and cross-boundary planning issues. The Council's intentions, the work it has done so far on co-operation and the template for addressing strategic issues, are set out in the Duty to Co-operate Statement and the Initial Statement of Common Ground.

1.6 Neighbourhood Plans

1.6.1 Communities can influence the future of their local areas by preparing a Neighbourhood Plan that sets out the vision for the area and general planning policies to guide development. Neighbourhood Plans are led and written by the community (not the Council) and must be in accordance with Barnet's adopted Development Plan as well as London Plan and national planning policy.

1.6.2 A Neighbourhood Plan that is prepared in line with legal requirements and supported by a majority in a local referendum must be adopted by the Council. Once adopted, a Neighbourhood Plan becomes part of the Development Plan and will be taken into account alongside the Council's other plans when making decisions on planning applications in that area. Neighbourhood Plans should support development and provide policies to guide and shape the form it takes. One Neighbourhood Plan in Barnet at West Finchley is, subject to a confirmatory referendum, expected to be adopted in Autumn 2021. Progress on this is set out on the Council's planning webpages.

1.7 Boundary Review

1.7.1 Following an electoral review by the Local Government Boundary Commission the Boroughs ward boundaries will change in May 2022. The changes are set out in the London Borough of Barnet (Electoral Changes) Order 2020. Council will ensure that these are reflected in the Local Plan.

2 Chapter 2 Challenges and Opportunities

2.1 Response to COVID19

- 2.1.1 Barnet has been impacted greatly by the COVID19 pandemic, particularly on many aspects of day-to-day life, from how we shop, work and learn to how we relate to our immediate environment indoors and most importantly how we relate to each other. While primarily a health issue, the unprecedented responses the pandemic has necessitated means that it is also an economic and social crisis. There are a range of long term changes we will need to respond to in planning the future of the Borough. This includes changes to our places, travel patterns and economy as well as health and wellbeing issues particularly among young people.
- 2.1.2 The pandemic has created new, and in some cases dramatic, economic challenges for residents, businesses and town centres. Young people, black and minority ethnic communities and people living in overcrowded rented accommodation have suffered a disproportionate impact from COVID-19 particularly in terms of rising unemployment, worsening mental health and reduced physical activity. Existing health inequalities in Barnet have been further heightened.
- 2.1.3 Although local evidence on the long term impact of COVID19 is still emerging, particularly through the Council's COVID19 Recovery Programme, the Local Plan help form the basis of a response to the pandemic. It reflects Council priorities: to support residents to improve their skills and get good jobs in the post-COVID economy; to enable town centres and our regeneration areas to thrive, and create an environment in which businesses can succeed and accelerate the borough-wide roll out of high quality digital connectivity. As part of the London Recovery Programme the Council is working with the Mayor of London and London Councils as well as other partners from the public, private and voluntary sectors to help restore confidence in the city, minimise the impact on London's most vulnerable communities and helping to rebuild the capital's economy and society.
- 2.1.4 With more people set to continue to work at home there has been a greater connection with local services in town centres. The concept of the '15 minute neighbourhood' underpins the advantages for people to have local shops as well as parks and open spaces that can be used for essential daily exercise and recreation within a readily walkable distance. The Local Plan helps to safeguard and enhance such valuable spaces. In addition, through promotion of Healthy Streets and healthy environments the Local Plan encourages more active and sustainable modes of travel as well as providing a framework for actions from the emerging Sustainability Strategy for making Barnet carbon neutral and helps facilitate a green recovery from COVID-19.

- 2.1.5 The importance of adequately sized homes to health and wellbeing has been highlighted by COVID19, particularly for those living in overcrowded rented accommodation. We know that having the right home helps families stay healthy, sustain a job, care for the family and contribute to their community. Having access to outdoor space was found to be particularly acute during the pandemic lockdown for those living in accommodation without access to private gardens. Health inequalities linked to deprivation are a key challenge for the Plan. The Council's Estate Renewal programme has the potential to positively address deprivation and associated health inequalities which have been further exposed by COVID19. Issues of ventilation and air circulation, social distancing space, homeworking space, private amenity space (in terms of gardens and balconies) and use of public realm and open spaces coming to the fore can be addressed by good quality design, delivering good quality safe, sustainable homes and places where people choose to work, rest and stay.
- 2.1.6 In our town centres the impact of e-tailing (online shopping) and m-tailing (mobile app shopping) has been amplified by the COVID19 pandemic. Whilst they now present greater challenges they also provide opportunities for Barnet's town centres to improve their offer, helped by the Council's COVID19 Recovery Programme and the way the Local Plan responds to the Government's fundamental review of the Use Classes Order in 2020 which introduced Use Class E – Commercial, Business and Service Uses. Use Class E is intended to allow greater flexibility to change between commercial, business and service uses. It will therefore have an impact on the Council's ability to manage and safeguard commercial uses in Barnet's town centres and employment areas. Further planning reforms through the General Permitted Development Order in 2021 have widened permitted development, allowing conversion from Use Class E to residential. The Government's encouragement of permissiveness presents a significant challenge for enabling existing businesses to be resilient and ensure that Barnet remains a great place to start and grow a business. In addition, the impact of the departure from the European Union on Barnet's economy will have to be considered in planning the future of the Borough.

2.2 Opportunities for Good Growth

- 2.2.1 Good growth is socially and economically inclusive as well as environmentally sustainable. Good growth is about utilising Barnet's advantages to deliver sustainable growth that works for everyone, contributing to strong and cohesive, family friendly communities, promoting healthy living and wellbeing, as well as delivering the homes that the Borough needs. Good growth involves making the Borough a place of economic growth and prosperity that is fit for recovery from COVID19, creating an environmentally sustainable Barnet that has built resilience to climate change.

2.2.2 Good growth needs to be supported by the timely delivery of infrastructure. Barnet's Infrastructure Delivery Plan (IDP) represents the Council's current assessment of infrastructure and helps identify the gap in funding to meet the Borough's infrastructure needs. It is a live document that is kept under constant review. With further assessment, the number and value of projects identified within the IDP will increase.

2.3 **Barnet's Character**

2.3.1 To fully appreciate Barnet's character, it is important to understand its growth in the last 150 years from a population of 6,400 living in villages in the mid-19th century to over 400,000 residents living in a successful London suburb¹. An important part of the Borough's character, is that as home to more families than any other London borough, a family friendly place. On the basis of current projections up to 2036, Barnet's population is expected to reach 452,000.

2.3.2 Barnet is one of the greenest boroughs in London and has 28% of its area designated as Green Belt. Overall, there is 1,192 hectares of public open space across the Borough. A key challenge of the Local Plan is to ensure that the distinctive character of the area is retained and where possible, enhanced further, whilst achieving sustainable growth. Character can also evolve over time in a positive way with good growth from developments large and small. Furthermore, the Council seeks to optimise the opportunity to use the Borough's open spaces asset to improve the health and wellbeing of its residents and attract visitors to the area.

2.3.3 In responding to the challenges of growth in the 21st Century Barnet needs to be innovative in identifying solutions. The Borough can draw upon the legacy of Raymond Unwin, the architect of Hampstead Garden Suburb, who along with Ebenezer Howard was one of the founders of the Garden City movement.

2.3.4 Sustainable growth is key to delivering the vision and objectives of this Plan to meet the needs of the Borough. Proposals such as the West London Orbital and the potential arrival of Crossrail 2 at New Southgate could provide a catalyst for growth. This potential must be planned for whilst the Council recognises the consequences of delays or cancellation. Ambitious schemes at Brent Cross Cricklewood, including Brent Cross Town, will help areas develop a new character. Understanding the challenges that we face in terms of providing new homes, jobs, services and infrastructure whilst still protecting Barnet's distinctive character underpins the effective delivery of the policies within the Local Plan. Effective planning will seek to maximise the opportunities that the Borough has to offer, including its town centres and areas of growth, open space and connectivity.

2.3.5 The Key Facts Evidence Paper provides further detail on the characteristics of the Borough and a profile of the key indicators and statistics that have formed the background to the issues, challenges and opportunities for the area.

2.4 Housing

- 2.4.1 A significant challenge for the Local Plan will be to provide a suitable mix of good quality housing that, in meeting the changing needs of the local community, remains affordable and is capable of serving future generations. The challenge is not simply a crisis of numbers. Significant quantities of new homes are needed with increased access to home ownership for first-time buyers but the real problem is not the numbers, but the affordability, type, design, quality and location of new and existing homes. It is important that the size and mix of homes delivered will reflect the changing demographic and economic make-up of Barnet. This Plan will seek efficient use of previously developed land and Barnet's existing housing stock. It will support opportunities for tenure diversity when it can bring development forward quicker and may consider precision manufactured housing on long term regeneration sites as an appropriate option in addressing Barnet's housing needs.
- 2.4.2 An efficient housing market that offers choice and affordability has an impact on the diversity of the area. The Council seeks to use all tools available to ensure that the Borough's housing needs are met, with the challenge of homes actually being built after planning permission is granted and that supporting infrastructure is funded and delivered in the right place and at the right time. Housing delivery must be accompanied by investment in transport, education, health, leisure, open spaces, green corridors and new employment opportunities. Barnet's Housing Delivery Action Plan (HDAP) highlights the causes of delays following planning consent and sets a narrative for housebuilding, highlighting the obstacles to delivery. Within the context of national housebuilding the HDAP sets out the local actions the Council proposes to undertake to help speed up the delivery of new homes in Barnet.
- 2.4.3 Provision of good quality, affordable rented homes is also a challenge as house prices have continued to rise in the Borough and demand for rental properties has increased.
- 2.4.4 Barnet's Housing Strategy 2019–2024 highlights that the Council will promote delivery of homes that meet the needs of older people and those with disabilities, as well as measures to support young people leaving care to make a successful transition to living independently. Provision of housing to meet these needs can also help support the wider objectives of the Council including health, wellbeing and safety. If delivered effectively this is a key opportunity that can be maximised through successful implementation of this Plan.

2.5 Economy and Town Centres

- 2.5.1 Barnet's town centre hierarchy provides a strong, distinctive feature for the Borough economy. The variety of centres (regional, major, district and local) across the Borough will be the focus of sustainable, mixed-use development, with the aim of promoting their unique identity as a catalyst for future growth. The UK retail market has been experiencing significant structural and conceptual changes, with the closure and consolidation of major national stores and brands, and the continuing competition from on-line retail. In addition, COVID19 has greatly impacted the economy with the full long term effects upon business and employment, remaining relatively unknown. A challenge to the success of town centre growth and vitality is the rise in online shopping and the difficulties that high street and independent retailers have had in responding to this competition. In response by offering a unique experience and providing destinations that allow people to access jobs, leisure and cultural facilities and enjoy attractive public realm, re-invigorated town centres can generate increased footfall and further contribute to local economic prosperity.
- 2.5.2 Local economic sectors that were declining before COVID19 such as retail and hospitality are expected to continue to do so, whilst others such as health and care, construction, creative industries and the "green" economy continue to grow at unprecedented rates. This creates new opportunities for the future that many residents will be able to access. Through Barnet's Work, Skills and Productivity Action Plan the Council is prioritising support for young people between 16 and 24 and is working directly with those furthest from the labour market to unlock opportunities to access employment. It is also seeking to improve pathways into work by prioritising high growth sectors; and delivering at scale and pace to ensure a fast recovery and prevent many residents from falling out of work.
- 2.5.3 As highlighted in the Key Facts Evidence Paper Barnet's economic activity rate is below the London and UK average. The employment rate is also lower than that for London. Employment in Barnet is expected to grow by 22% by 2036, generating an additional demand for office space of approximately 40,000 m². With a strong culture of self-employment in Barnet it is particularly important that there is sufficient provision of affordable and flexible workspace, particularly in town centres, to support small to medium businesses that can contribute to the success of the Borough's economy.

2.6 Environment

- 2.6.1 Maintaining the quality of the environment whilst delivering the levels of forecast growth is a key challenge for Barnet. Good growth also provides an opportunity to become more efficient and resilient, adapting to the consequences of environmental change created by human behaviour and mitigating the future impacts in particular flood risk and water quality from proposed development. Water supply and waste water management have both been assessed as part of the West London Alliance Strategic Infrastructure Delivery Plan (WLA SIDP). A Stage 2 Strategic Flood Risk Assessment provides further support for the Local Plan's development proposals.

- 2.6.2 Barnet is one of the greenest boroughs in London. Green spaces and low density suburban development form an important element of Barnet's character. There is a challenge in protecting and enhancing this space and amenity value to residents. Barnet's Parks and Open Spaces Strategy 2016-26 (BPOSS) provides evidence on existing open spaces that forms part of Barnet's Green Infrastructure network and its intrinsic value. To make Barnet carbon neutral by 2050 the Council is progressing a Sustainability Strategy that sets out the actions we will take to deliver a green and thriving Borough; with a key focus on keeping neighbourhoods clean, green and with good air quality, ensuring that development and growth in the borough is sustainable, maximising reusing and recycling, and reducing consumption and waste.
- 2.6.3 The London Plan outlines the Mayor's aspirations to become zero carbon by 2050 by increasing energy efficiency and maximising the use of low carbon energy sources in all stages of the development process, from design and construction to operation. An integrated approach to development should see all sectors coming together to achieve good growth alongside a healthy and attractive, low carbon environment, that can improve air quality, mitigate the impacts of climate change, enhance green infrastructure and encourage active travel.

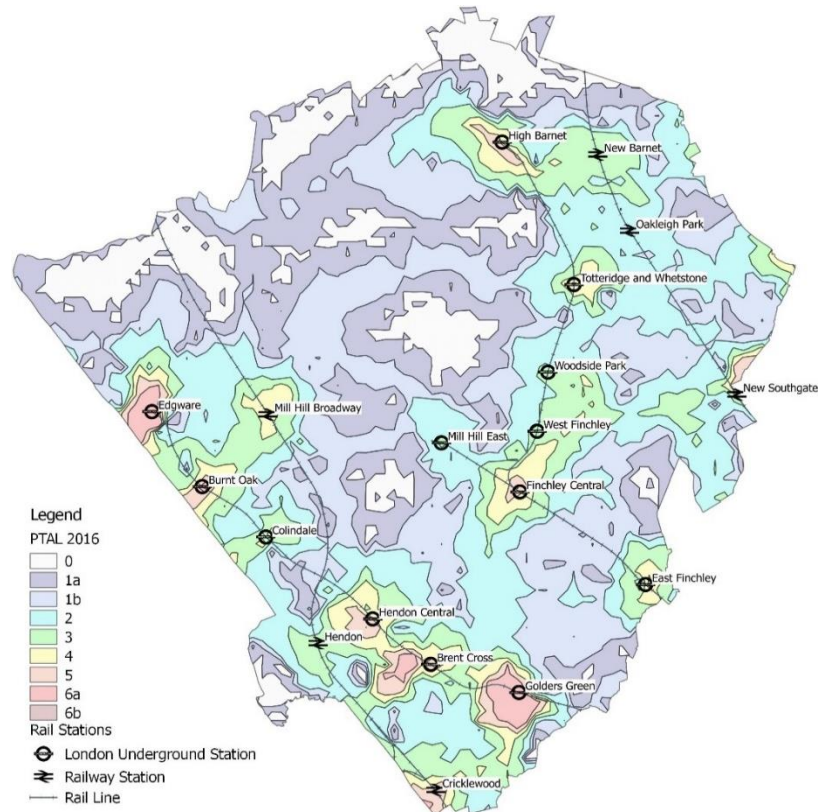
2.7 Health and Wellbeing

- 2.7.1 Health and wellbeing is strongly determined by the surrounding environment in which people live, including factors such as housing, education, air quality, unemployment, transport/connectivity and social inclusion. Planning policies can contribute greatly to many of these determinants of health, which is a further challenge over the plan period. The Council will seek to ensure that both direct and indirect consequences of the delivery of this Plan will help improve the health and wellbeing of local residents. COVID19 has highlighted further existing public health challenges and disparities in health and wellbeing to which the Council is responding through the Health and Wellbeing Strategy 2021-2025 to respond to
- 2.7.2 The Joint Strategic Needs Assessment (JSNA) provides a background to understanding the needs of the population. Whilst the Joint Health and Wellbeing Strategy sets the vision and priorities on how the Council can help create a healthy place that supports people in living healthy and happy lives and staying as independent as long as possible. A key ambition for the Local Plan is delivering the Healthy Streets Approach. As outlined in the London Plan this promotes the use of public space to improve health and reduce health inequality.
- 2.7.3 Barnet's growth has the potential to bring several challenges for community safety and cohesion. Policies should express the objectives of the Community Safety Strategy 2015-2020 to reduce crime and fear of crime, helping to ensure Barnet is recognised as a safe place to visit, whilst enhancing the wellbeing of its residents.

2.8 Transport

2.8.1 Barnet is well served by public transport for radial travel, but orbital travel is significantly more challenging. In addition to the underground and national rail services to central London, Barnet has a good network of bus services that provide a varied frequency of journeys depending on the route; however, bus journeys tend to be slower than by car due to congestion. Map 1 shows existing levels of Public Transport Accessibility in the Borough.

Map1 Existing Public Transport Accessibility Levels (PTAL



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- 2.8.2 Traffic congestion is a significant challenge for Barnet, particularly along the major thoroughfares such as the A1, M1, A41 and A406, with a considerable number of trips originating outside Barnet.
- 2.8.3 Public transport as a method of travel to work makes up around 29% of journeys made by Barnet residents (8% by bus, 17% by underground and 4% by rail)², which is slightly higher than the Outer London average.
- 2.8.4 The car is the dominant mode of transport in Outer London and Barnet has long been associated with high levels of car ownership. Although there has been some indication of a decline in car ownership, 70% of residents live in households with a motor vehicle³. A challenge for the Local Plan is to increase the rate of change in terms of car use, which includes support for active travel and public transport opportunities, as well as promoting innovative ways to enable long term modal shift. Improvements to orbital public transport is a vital consideration if suitable alternatives to car use are to be delivered effectively.
- 2.8.5 A key objective of Barnet's Long Term Transport Strategy is that transport keeps the Borough moving, enabling people and goods to move within and beyond the borough efficiently using high quality orbital and radial links. The ability of people and goods to move around the Borough is vital for the continued social and economic wellbeing of the Borough. Environmental wellbeing will also be achieved through less congestion and the promotion of modal shifts in transport, for instance from private vehicles to more sustainable forms of transport.
- 2.8.6 The Local Plan is supported by a Strategic Transport Assessment which has assessed the cumulative impact expected from projected growth up to 2036. This includes impacts relating to the highway network (strategic and non strategic) and public transport (bus and rail).
- 2.8.7 Barnet's Strategic Transport Assessment acknowledges that the long term impacts of COVID19 on transport use remain uncertain and has therefore maintained levels of pre COVID19 growth as the basis for the Assessment.

3 Chapter 3 - Barnet's Vision and Objectives

3.1 Vision

3.1.1 Taking into account the challenges highlighted in Chapter 2 the Local Plan Vision is:

By 2036, Barnet has successfully demonstrated the benefits that good, well planned growth can deliver. The Borough continues to be a place that is family friendly

Growth has been directed into the most sustainable locations with good public transport and active travel choices. These include Brent Cross, Colindale, New Southgate and Mill Hill East as well as our main town centres at Burnt Oak, Chipping Barnet, Cricklewood, Edgware, Finchley Central, Golders Green and North Finchley. Outside these locations, growth has been supported in places with capacity for change and where local character and distinctiveness are recognised.

Getting the best out of our natural environment through expanding and improving access to green and blue infrastructure, delivering biodiversity net gain and restoring the Borough's rivers to the benefit of people and wildlife whilst protecting our communities from flooding. As a Borough that values its historic environment Barnet continues to be a place where people choose to make their home.

Responsive and adaptable, Barnet's town centres have recovered from the COVID19 pandemic and thrive, with the efficient and sustainable use of their locational opportunities addressing the needs of a growing population: providing innovative business, leisure and cultural activities, at the same time as retaining their individual character.

Barnet's improved orbital connectivity allows for a greater range of places where people can live, work or visit and provides for a greater range of sustainable transport options including cycling and walking for getting around the Borough.

The positive benefits of growth and investment are accessible to Barnet residents, removing physical barriers to enable all to share in new social and community infrastructure and access a range of housing types and a thriving jobs market while enjoying living in a safe, healthy and sustainable Borough.

3.2 Themes and Objectives

3.2.1 Reflecting the values of the Vision there are five cross-cutting themes within the Local Plan. These are also set out in Barnet's Growth Strategy 2019 – 2030:

- A growing borough;
- A connected borough
- An entrepreneurial borough
- A borough of thriving town centres, and
- A great borough to live in and visit.

3.2.2 In order to deliver the Local Plan Vision a series of key objectives have been developed for the Local Plan. These are:

- To respond and recover from the impact of COVID19
- To deliver growth to meet housing aspirations and needs
- To improve the quality and types of housing across the Borough in response to resident needs and demographic change
- To make Barnet a place of economic growth and prosperity where space for commercial, business and service uses are fit for a post COVID19 recovery
- To improve orbital connectivity and sustainable travel options including cycling and walking
- To conserve and enhance the historic environment of the Borough, particularly the distinctive character and identity of Barnet's town centres and suburbs
- To support strong and cohesive family friendly communities
- To promote healthy living and wellbeing
- To meet social infrastructure needs
- To deliver an environmentally sustainable Borough and build resilience to climate change
- To integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and green and blue infrastructure,
- To ensure new development is high quality, sustainable, and capable of adaption to meet the needs of residents over their lifetime

3.2.3 Table 2 highlights how these objectives underpin the most relevant sections of the Local Plan and the 52 policies within them.

Table 2 – Relationship of Local Plan Key Objectives to Policies

Key Objectives	Local Plan Chapters	Most relevant Local Plan policies
To respond and recover from the impact of COVID19	Growth and Spatial Strategy, Housing, Town Centres, Economy, Community Uses, Health and Wellbeing	BSS01, GSS01, GSS04, GSS05, GSS08, GSS13, TOW01, TOW02, ECY01, ECY02, CHW02
To deliver growth to meet housing aspirations and needs	Growth and Spatial Strategy, Housing, Character, Design and Heritage	BSS01, GSS01, GSS02, GSS03, GSS04, GSS05, GSS06, GSS07, GSS08, CDH04, CDH05, CDH06, CDH07
To improve the quality and types of housing across the Borough in response to resident needs and demographic change	Growth and Spatial Strategy, Housing, Character, Design and Heritage	GSS10, HOU01, HOU02, HOU03, HOU04, HOU05, HOU06, HOU07, CDH01, CDH02
To make Barnet a place of economic growth and prosperity where space for commercial, business and service uses are fit for a post COVID19 recovery	Growth and Spatial Strategy, Town Centres, Economy, Transport and Communications	BSS01, GSS01, TOW01, TOW02, TOW04, ECY01, ECY02, ECY03, TRC04
To improve orbital connectivity and sustainable travel options including cycling and walking	Growth and Spatial Strategy, Community Uses, Health and Wellbeing, Transport and Communications	GSS09, GSS11, CDH01, CDH02, CDH03, TRC01, TRC02, TRC03
To conserve and enhance the historic environment of the Borough, particularly the distinctive character and identity of Barnet's town centres and suburbs	Character, Design and Heritage, Community Uses, Health and Wellbeing,	CDH01, CDH02, CDH03, CDH04, CDH09, CHW05

To support strong and cohesive family friendly communities	Growth and Spatial Strategy, Housing, Community Uses, Health and Wellbeing, Character, Design and Heritage, Environment and Climate Change, Economy, Town Centres	BSS01, GSS01, GSS13, HOU02, CDH03, CHW01, CHW03, CHW04, ECC04, TOW02, TOW03, TOW04, ECY03
To promote healthy living and wellbeing	Community Uses, Health and Wellbeing, Town Centres, Environment and Climate Change	CHW01, CHW02, CHW04, TOW03, TRC01, ECC01, ECC04
To meet social infrastructure needs	Growth and Spatial Strategy, Community Uses, Health and Wellbeing	BSS01, GSS01, CHW01, CHW02
To deliver an environmentally sustainable Borough and build resilience to climate change	Growth and Spatial Strategy, Environment and Climate Change, Transport and Communications	BSS01, GSS01, GSS12, ECC01, ECC02, ECC02A, ECC03, ECC04, TRC01, TRC02, TRC03, TRC04
To integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and green and blue infrastructure,	Growth and Spatial Strategy, Environment and Climate Change	BSS01, GSS01, GSS13, ECC04, ECC05, ECC06
To ensure new development is high quality, sustainable, and capable of adaption to meet the needs of residents over their lifetime	Character, Design and Heritage, Housing	HOU01, HOU02, HOU03, HOU04, HOU05, HOU06, CDH01, CDH02, CDH03, CDH04,

3.3 Delivering a strategy to meet Barnet's challenges

- 3.3.1 The Local Plan is the product of an evolving process, developed through various stages of consultation and visioning workshops, whilst considering the wider policy objectives of the London Plan and the NPPF. Over the Plan period to 2036, the Council seeks to create the conditions in the Borough that will deliver a minimum of 35,460 new homes equal to 2,364 new homes per annum. This target will be achieved through a combination of Local Plan policies and proposals and the Growth Strategy Delivery Plan which will set out the key projects where the Council will direct its future investment.
- 3.3.2 In delivering a significant number of new homes a key objective for the Council will be to increase the supply of affordable ownership and rental options. Residential led mixed-use development, that can help create strong and inclusive communities, should be supported with appropriate community facilities, employment, retail, leisure and infrastructure.
- 3.3.3 Reflecting the vision and objectives that have been set out, Policy BSS01 provides an overarching spatial strategy to capture the aspirations for Barnet's preferred approach over the Plan period. As well as new homes delivery it sets out the aspects of growth in terms office and retail space as well as new provision for public open space, sports and recreation across Barnet. Making this supporting provision happen will, as with new homes, be achieved through a combination of Local Plan policies and proposals in the Growth Strategy Delivery Plan.
- 3.3.4 The NPPF requires Local Plans to make it explicit which policies are strategic policies. Policies with the prefix BSS and GSS (GSS01 to GSS13) are considered to be strategic policies (as set out in Table 3).

Table 3 – Strategic and Non-Strategic Policies

Local Plan Strategic Policies	Local Plan Non Strategic Policies
BARNET'S VISION & OBJECTIVES	HOUSING
Policy BSS01 Barnet's Spatial Strategy	Policy HOU01 Affordable Housing
	Policy HOU02 Housing Mix
GROWTH & SPATIAL STRATEGY	Policy HOU03 Residential Conversions and Redevelopment
Policy GSS01 Delivering Sustainable Growth	Policy HOU04 Specialist Housing
Policy GSS02 Brent Cross Growth Area	Policy HOU05 Efficient Use of Barnet's Housing Stock
Policy GSS03 Brent Cross West Growth Area	Policy HOU06 Meeting Other Housing Needs
Policy GSS04 Cricklewood Growth Area	Policy HOU07 Gypsies, Travellers and Travelling Showpeople
Policy GSS05 Edgware Growth Area	CHARACTER DESIGN & HERITAGE
Policy GSS06 Colindale Growth Area	Policy CDH01 Promoting High Quality Design
Policy GSS07 Mill Hill East	Policy CDH02 Sustainable and Inclusive Design
Policy GSS08 Barnet's Town Centres	Policy CDH03 Public Realm
Policy GSS09 Existing & Major New Transport Infrastructure	
Policy GSS10 Estate Renewal	
Policy GSS11 Major Thoroughfares	
Policy GSS12 Redevelopment of Car Parks	

<p>Policy GSS13 Strategic Parks and Recreation</p>	<p>Policy CDH04 Tall Buildings Policy CDH05 Extensions Policy CDH06 Basements Policy CDH07 Amenity Space and Landscaping Policy CDH08 Barnet’s Heritage Policy CDH09 Advertisements</p> <p>TOWN CENTRES Policy TOW01 Vibrant Town Centres Policy TOW02 Development principles in Barnet’s Town Centres, Local Centres and Parades Policy TOW03 Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars Policy TOW04 Night –Time Economy</p> <p>COMMUNITY USES, HEALTH AND WELLBEING Policy CHW01 Community Infrastructure Policy CHW02 Promoting health and wellbeing Policy CHW03 Making Barnet a safer place Policy CHW04 Protecting Public Houses</p> <p>ECONOMY Policy ECY01 A Vibrant Local Economy Policy ECY02 Affordable Workspace Policy ECY03 Local Jobs, Skills and Training</p> <p>ENVIRONMENT & CLIMATE CHANGE Policy ECC01 Mitigating Climate Change Policy ECC02 Environmental Considerations Policy ECC03 Dealing with waste Policy ECC04 Barnet’s Parks and Open Spaces Policy ECC05 Green Belt and Metropolitan Open Land Policy ECC06 Biodiversity</p> <p>TRANSPORT & COMMUNICATIONS Policy TRC01 Sustainable and Active Travel Policy TRC02 Transport Infrastructure Policy TRC03 Parking management Policy TRC04 Digital Communication and Connectivity</p>
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POLICY BSS01 Spatial Strategy for Barnet

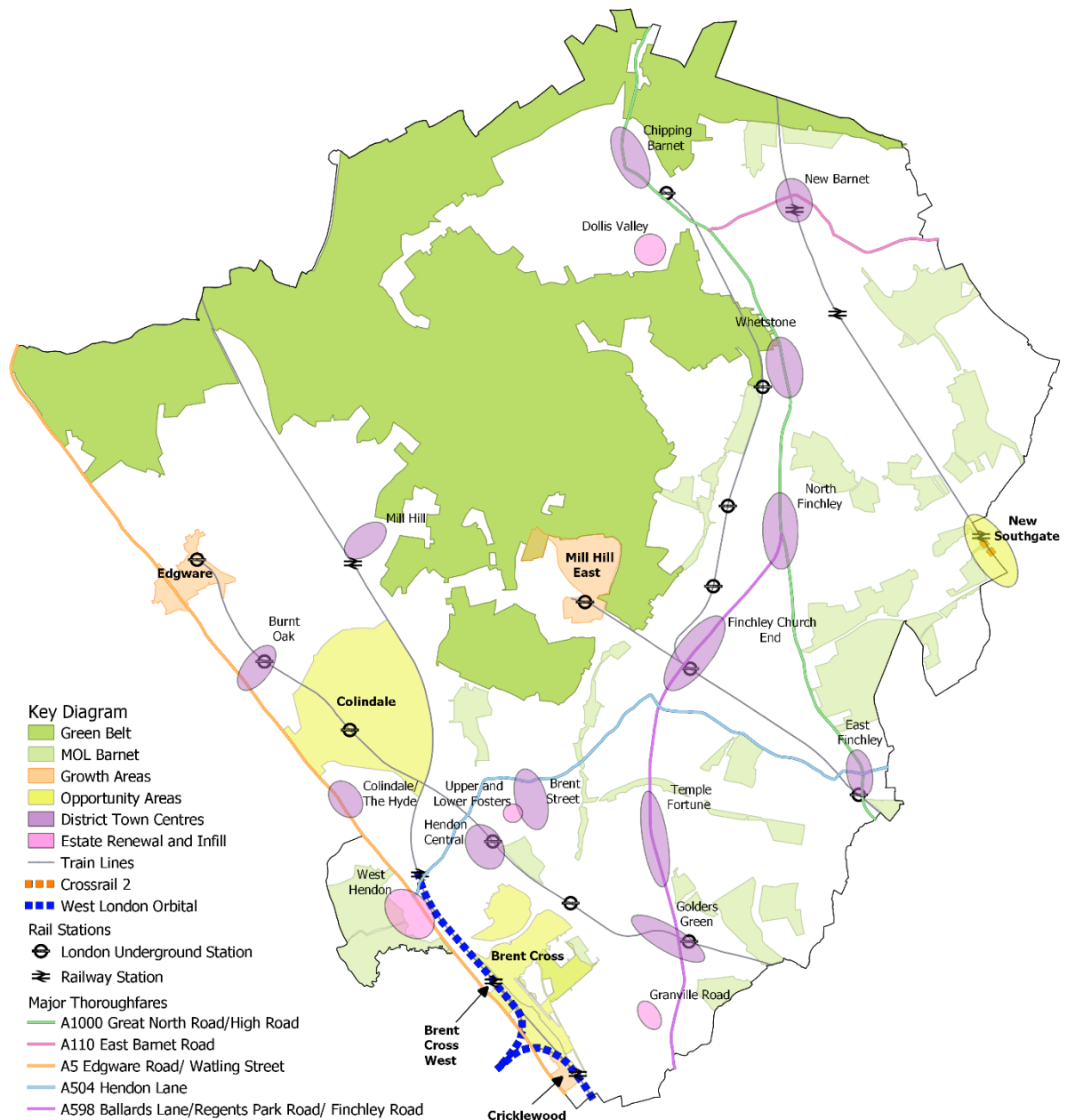
a) In order to make the Council’s vision for Barnet happen, the Local Plan seeks to deliver between 2021 and 2036:

- i. A minimum of 35,460 new homes, including the provision of affordable housing to meet Policy HOU01;
 - ii. 395,000m² of new office space at Brent Cross Town and 56,600 m² of new retail space at Brent Cross North;
 - iii. Up to 67,000 m² of additional office space across Barnet's town centres, including the provision of affordable workspace to meet Policy ECY02;
 - iv. a new Regional Park within designated Green Belt or Metropolitan Open Land as set out in Policy GSS13; and
 - v. 3 new destination hubs for sport and recreation at: Barnet and King George V Playing Fields; Copthall Playing Fields and Sunny Hill Park; and West Hendon Playing Fields as set out in Policy GSS13.
- b) The Council will seek to minimise the Borough's contribution to climate change in accordance with Policy ECCO1.
- c) In order to better manage the impacts of development on the climate, growth will be concentrated in accordance with the Local Plan's suite of strategic policies GSS01 to GSS13 in the Opportunity Areas of Brent Cross Cricklewood, Colindale and New Southgate, together with Barnet's Growth Areas and District Town Centres. These are the most sustainable locations with good public transport connections and active travel provision. Outside of these locations, growth will be supported in places where there is recognised capacity and where the historic environment and local character can be conserved or enhanced as a result.
- d) The Social, Green and Physical Infrastructure and funding, particularly through the Community Infrastructure Levy, to support this growth is subject to constant review through the Infrastructure Delivery Plan.

3.4 The Key Diagram

- 3.4.1 On a conceptual level the Key Diagram illustrates the Council's overall spatial strategy. This shows the broad locations where the Council expects a concentration of development to be located.
- 3.4.2 The Opportunity Areas are designated within the London Plan as the capital's principal opportunities for accommodating large scale development. The Opportunity Areas are supported by Area Frameworks that set the parameters for development proposals that contribute to regeneration and tackle inequalities as well as the environmental, economic and social barriers that affect the lives of people in the area. Opportunity Areas have the highest expectations for delivering new homes and new jobs as well as supporting infrastructure. Opportunity Areas are the largest strategic locations in the Key Diagram.
- 3.4.3 The Growth Areas are distinctive locations with good public transport accessibility. They have a supply of brownfield and underused land and buildings that offer opportunities for inward investment. Growth Areas, together with the District Town Centres, provide identified developable and deliverable sites with substantial capacity for new homes, jobs and infrastructure. Smaller and more focused Growth Areas can also be within Opportunity Areas. Through planning frameworks parameters can be set for ensuring good place-making and responding to the individual characteristics of Growth Areas and individual Town Centres
- 3.4.4 The nature of growth is reflected in Annex 1 - the Schedule of Proposals which sets out the Council's development requirements for individual sites across the Borough. The Key Diagram shows the Opportunity Areas of Brent Cross Cricklewood, Colindale and New Southgate together with Barnet's Growth Areas, District Town Centres and locations for housing estate renewal and infill development. The Key Diagram also indicates transport nodes, major thoroughfares and new transport infrastructure as well as the Borough's Green Belt and Metropolitan Open Land.

Map 2 – Key Diagram



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4 Chapter 4 – Growth and Spatial Strategy

4.1 National and London Plan Policy Context

4.1.1 Specific National and London Plan Policies to be taken into account:

NPPF

Section 3 Plan Making – Non-Strategic Policies specifically para 29

Section 5 Delivering a Sufficient Supply of Homes specifically paras 59, 60, 65, 67 and 73

Section 6 Building a strong and competitive economy specifically para 81

Section 9 Promoting sustainable transport specifically paras 102 and 103

Section 11 Making effective use of land specifically paras 117, 118, 119 and 123

Section 13 Protecting Green Belt Land specifically para 134

London Plan

Policy GG2 Making the best use of land

Policy GG4 Delivering the homes Londoners need

Policy SD1 Opportunity Areas

Policy SD6 Town centres and high streets

Policy SD10 Strategic and local regeneration

Policy D3 Optimising capacity through the design-led approach

Policy D13 Agent of Change

Policy H1 Increasing housing supply

Policy H8 Loss of existing housing and estate development

4.2 Introduction

4.2.1 Over the Plan period of 2021 to 2036, significant growth and change is anticipated in the Borough. This Chapter sets out the forecast levels of growth and identifies broad locations to accommodate it. New housing remains a key component of planned growth, and this must be accompanied by suitable supporting infrastructure including transport, schools, healthcare and open spaces. Economic growth is vital to provide local employment and services, sustaining thriving town centres and delivering a range of jobs which meets the needs of Barnet's increasing population.

4.2.2 Good growth, especially that in response to the impact of COVID19, must be beneficial for existing and future Barnet residents and policies in this Chapter must be read with cross-reference to other more thematic Local Plan policies such as those on character, design and heritage, housing needs and aspirations or community health and wellbeing.

4.3 Barnet's Growth Requirements

4.4 Housing

4.4.1 The NPPF requires Barnet to determine the minimum number of homes needed with strategic policies informed by a local housing need assessment that has been formulated by the Government. This is conducted using the standard method provided in national planning guidance.

- 4.4.2 To achieve a national housing target of 300,000 new homes per annum the Government (MHCLG) in 2018 introduced a methodology that set out minimum housing requirements through the ‘Standard Method’ approach. This is an unconstrained assessment of the number of homes needed in an area and requires greater refinement as part of the Local Plan’s design led and place-shaping approach to delivering growth in response to Barnet’s objectively assessed housing need. Since its introduction in 2018 the methodology has been revised several times and housing requirements have gone up and down. The most recent requirement of 5,361 new homes per annum is reflected in Table 4. Within London there is more clarity about housing targets. It is the role of the London Plan to set individual housing targets for individual boroughs.
- 4.4.3 The Draft London Plan housing target, published December 2017, was set at 3,134 new homes per annum. The report of the independent Panel of Inspectors appointed to examine the London Plan was published in October 2019. Whilst accepting the London Strategic Housing Market Assessment (SHMA) housing need figure of 660,000 new homes between 2019 and 2029, the Panel recommended a reduction in the overall London-wide housing target. This is reflected in the London Plan published in March 2021 which sets the housing target for Barnet of **2,364** new homes per annum as a minimum.
- 4.4.4 In 2018 the Council, in partnership with the West London Alliance, commissioned a Strategic Housing Market Assessment (SHMA) consisting of two reports - a Borough SHMA for Barnet and a sub-regional SHMA for West London. This SHMA establishes the level of housing demand and the scale of housing supply necessary to meet this demand – including backlog demand from households in temporary accommodation, and those on waiting lists with an identified housing need. Barnet’s SHMA identifies the Full Objectively Assessed Need (OAN) for housing in Barnet as 3,060 dwellings per year. This equates to a need of 46,000 new homes over the lifetime of the Local Plan.

Table 4 – Housing Requirement Assessments⁴

New Homes for Barnet	MHCLG Standard Methodology (9Dec 2020)	London Plan (March 2021)	Draft London Plan (Dec 2017)	Barnet SHMA (Oct 2018)
Per annum	5,361	2,364	3,134	3,060
Total 2021 - 2036	80,415	35,460	47,000	46,000

4.4.5 Barnet therefore proposes to meet the London Plan target of **35,460** new homes over the Plan Period up to 2036, while providing a supply of sites for up to 46,000 new homes. In meeting this need to deliver the right homes in the right places, the Council will seek support to boost delivery from the Government and Homes England, as well as the Greater London Authority, through funding streams such as the Home Building Fund and Good Growth Fund.

4.5 Town Centres, Economy and Jobs

4.5.1 Growth of the local economy will be encouraged and supported, generating the new jobs needed to provide employment for Barnet's growing population. During the plan period Barnet will deliver more than **27,000**⁵ new jobs, with the majority of these to be generated in the Brent Cross Growth Area where permission has been granted for 395,000 m² of offices which now forms part of Use Class E – Commercial, Business and Service Uses.

4.5.2 The Barnet Employment Land Review (BELR) produced on the basis of the pre-2020 Use Classes Order considered the Borough's supply of office and industrial space as well as the prospects for the office market and jobs growth. The BELR concluded that efforts should be focused on protecting employment land and estimated that Barnet required, in addition to Brent Cross, another 67,000 m²⁶ of new office space. This quantum is a maximum which should be met within Barnet's town centres as these are the most sustainable locations.

4.5.3 The Council is committed to maintaining a range of town centres capable of serving a range of community needs at all times of the day and to ensuring their continued vitality and viability. This Local Plan should ensure the sustainable success of town centres and employment areas as thriving places where retailers and other businesses want to invest and to explore the scope for them to play an important part in addressing the causes and consequences of climate change. Changes to the Use Classes Order and the General Permitted Development Order in 2020 and 2021 together with proposals in the "Planning for the Future" White Paper, and the implications of Brexit, have changed this context. As part of the West London Alliance the Council is working on a new study to establish how much each of the uses covered by the new Use Class E may be needed over the period to 2036 and the key trends and drivers affecting this.

4.5.4 The Council protects employment locations classified as Locally Significant Industrial Sites. In 2019 it implemented an Article 4 Direction to protect existing office accommodation (formerly B1a) and light industrial processes, research and development (formerly B1c) from permitted development conversion to residential. This safeguarding has been diminished by the replacement in 2020 of Use Class B1 with Use E - Commercial, Business and Service Uses.

- 4.5.5 Brent Cross has outline consent from 2010 for 56,600m² of comparison retail floorspace. Similar to the BELR, the Town Centre Floorspace Needs Assessment (TCFNA) was produced on the basis of the pre-2020 Use Classes Order. This considered demand for another 77,000 m² of (former Use Class A1 comparison floorspace up to 2036 together. Retail uses, along with financial and professional services and café uses, have been subsumed within Use Class E. The TCFNA also considered demand for up to 33,330 m² of food and drink uses, the majority of which (as restaurants and cafes) now sits within Use Class E. As the retail market experiences significant and conceptual change there is a need for town centres to diversify in terms of other retail uses such as food and drink, becoming social and community hubs as well as economic centres supported by new housing development. The COVID19 pandemic has accelerated movement away from traditional retail formats and further changed the way we shop and interact with town centres as the focus of local commercial activity. As part of the West London Alliance the Council is working on a new study to establish how much additional retail provision may be needed over the period to 2036.
- 4.5.6 The provision of higher education and research makes a major contribution to Barnet's local economy and is also a source of direct and indirect employment supporting local businesses and providing residents with employment. The Council and Middlesex University have the shared ambitions of the campus at Hendon becoming a thriving high quality environment that enables the entire Borough to capitalise on the benefits through encouraging innovative and creative industries that strengthen Barnet's economy.

4.6 **Parks and Recreation**

- 4.6.1 Barnet's open spaces and outdoor sports and recreational facilities are an important element of the Borough's character. As Barnet grows there is a need to improve provision and keep them clean, safe and well-run. With an extensive green infrastructure incorporating public rights of way, parks and gardens together with a comprehensive network of sports and recreational facilities, there is an opportunity to create more active environments. By providing better access to green public spaces and improving sports and community facilities the Council seeks to promote the integration of physical activities into the everyday lives of residents, as well as encouraging a better understanding of, and relationship with, the natural environment.
- 4.6.2 To assist in this strategic aspiration the Council has created three destination sports hubs at Chipping Barnet (King George V Playing Fields), Copthall and West Hendon Playing Fields that offer a range of activities and opportunities for participation in physical and also community activities. This is in addition to open spaces being delivered as part of the regeneration of Brent Cross, including improvements to Clitterhouse Playing Fields which will create a destination for participation in sports and recreation.

4.6.3 The Council will continue to promote a new Regional Park within designated Green Belt or Metropolitan Open Land in the Brent Valley and Barnet Plateau as highlighted in the Mayor's All London Green Grid Supplementary Planning Guidance (2012).

4.7 Major Transport Infrastructure

4.7.1 The COVID19 pandemic in 2020/21 dramatically reduced the need to travel. Despite this there remains a strong economic case for infrastructure projects such as West London Orbital. The West London Orbital has been identified by Transport for London and the West London Alliance as essential infrastructure to support, enable and accelerate sustainable and inclusive population and employment growth. The scheme is expected to help deliver new homes and jobs, with an emphasis on ensuring that residents have the skills to access new job opportunities. Brent Cross West station will be completed in 2022 as part of the regeneration of Brent Cross. In the east of the Borough a future confirmation of Crossrail 2 (the land for which remains safeguarded) could have a similar impact to the WLO. Public transport nodes such as London Underground and Network Rail stations also have a significant contribution to make to sustained growth. The Council's Long Term Transport Strategy will inform a programme of priority transport investments that will support and address the strategic needs of Barnet.

4.8 Delivering Sustainable Growth

4.8.1 The Local Plan sets out how the London Plan housing target can be met over the Plan period. It must demonstrate a clear understanding of the land available, including existing growth areas, taking into account availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the Local Plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.

4.8.2 Delivery of new homes will mostly be in the key Growth Areas of Brent Cross – Cricklewood (Opportunity Area), Colindale (Opportunity Area), Mill Hill East, Brent Cross West, Edgware and Cricklewood alongside new housing in the Borough's Town Centres. Each of these growth locations is distinctive and the Local Plan will respond to these individual characteristics to ensure good place-making.

4.8.3 This approach to growth will seek to regenerate and develop areas of brownfield and underused land and buildings, particularly where these are located in areas of good public transport provision. The Growth Areas and Town Centres also offer a range of investment opportunities through identified developable and deliverable sites with substantial capacity to accommodate new homes, jobs and infrastructure.

- 4.8.4 In meeting this need to deliver the right homes in the right places, the Council will produce a Sustainable Design Guidance SPD. This SPD will replace two existing SPDs on Residential Design Guidance and Sustainable Design and Construction. In addition to carrying forward the content of the existing documents the new SPD will include area-wide housing design codes that cover types of development most commonly associated with small sites (under 0.25 ha) The Local Plan small sites target provides a reliable source of windfall sites which contributes to anticipated supply and meets the requirements of the NPPF (para 70).
- 4.8.5 Barnet can deliver against and exceed a minimum housing capacity of 35,460 new homes from 2021 to 2036, spread over the delivery period as shown in Table 5. Further detail on the supply that can be delivered from specific sites is set out in Annex 1 - Schedule of Proposals and Table 5A.
- 4.8.6 The housing trajectory (Figure 3) is a means of measuring the Council's past and future housing performance in meeting the housing target. The housing trajectory is based on information relating to past housing completions, current planning approvals and anticipated future housing proposals. It estimates the potential number of units on each Opportunity Site in the Borough and estimates a realistic timeframe for development. These figures are subject to ongoing review and monitoring through the Authorities Monitoring Report (AMR). The housing trajectory sets out an annual breakdown of Barnet's housing supply over the plan period assessed against the London Plan target.

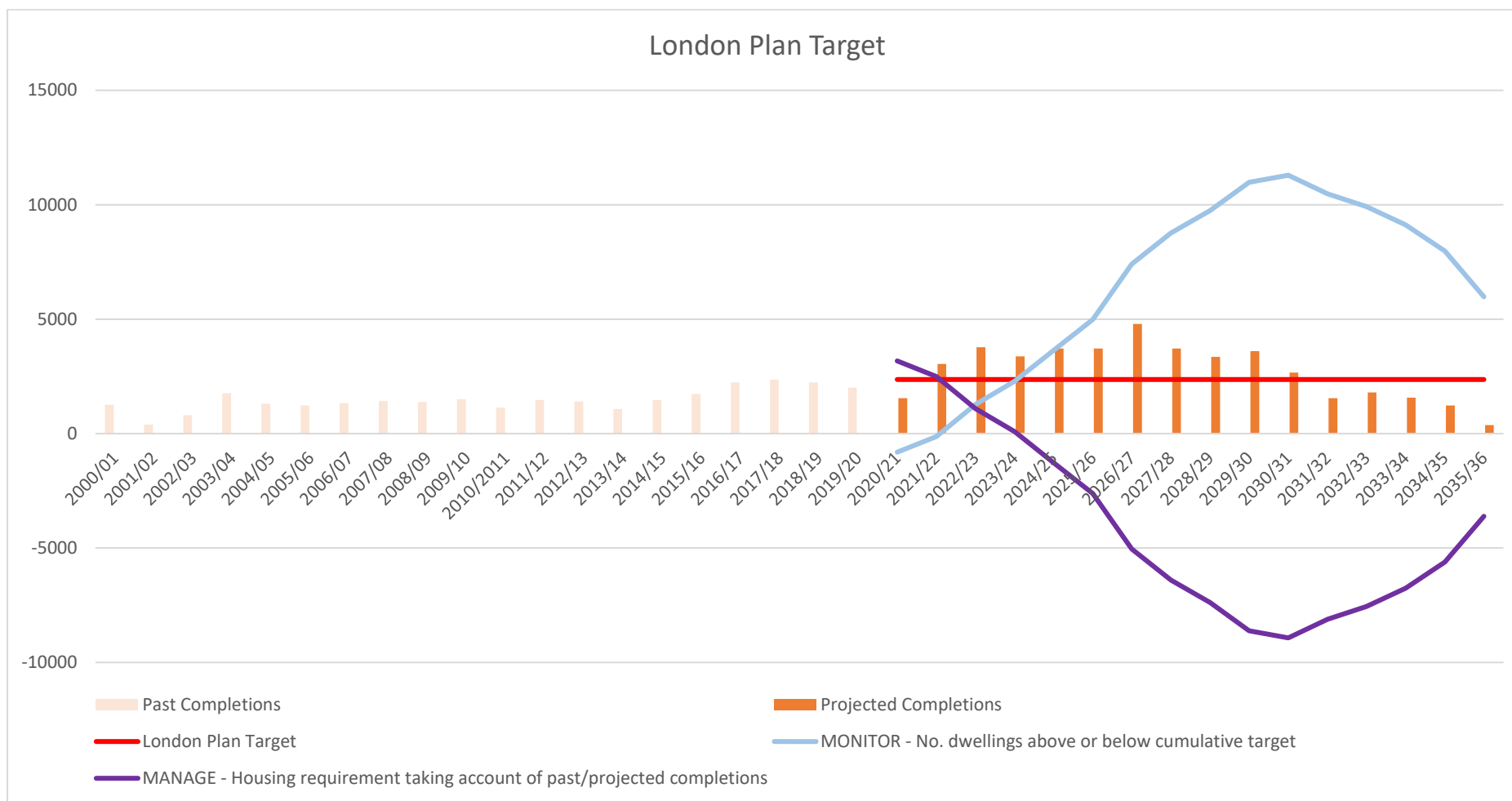
Table 5 - New Homes Delivery – 2021/22 to 2035/36

	Years 1-5	Years 6-10	Years 11-15	Total Supply
	2021/22 – 2025/26	2026/27 – 2030/31	2031/32 – 2035/36	
<i>Brent Cross</i>	600	3,700	5,200	9,500
<i>Brent Cross West</i>	-	-	1,800	1,800
<i>Cricklewood</i>	1,250	150	-	1,400
<i>Edgware</i>	100	3,250	1,650	5,000
<i>Colindale</i>	3,000	1,100	-	4,100
<i>Mill Hill East</i>	1,200	200	100	1,500
Growth Areas Sub-Total	6,100	8,400	8,800	23,300
District Town centres	1,950	2,250	1,200	5,400
Existing & New Major Transport Infrastructure	-	950	700	1,650
Estate renewal & infill	1,350	2,500	550	4,400
Major Thoroughfares	2,050	1,300	-	3,350
Other large sites	1,100	1,500	200	2,800
Small Sites (under 0.25 ha)	1,700	1,700	1,700	5,100
Total	14,250	18,600	13,150	46,000

Table 5A Contribution of Identified Sites on Sites Schedule to New Homes Delivery.

	Years 1-5	Years 6-10	Years 11-15	Total
Contribution from Sites Schedule	4,600	10,400	2,200	17,200

Figure 3 – Barnet’s Housing Trajectory 2021/22 – 2035/36



POLICY GSS01 Delivering Sustainable Growth

The Council will create the conditions for sustainable growth to deliver the homes, jobs, retail floorspace and community facilities to meet Barnet's identified needs. Infrastructure is key to supporting growth, including investment in transport, education, health and open spaces.

Employment growth between 2021 and 2036 will create more than 27,000 new jobs, many within the Brent Cross Growth Area where permission has been granted for 395,000 m² (net) of office space and 56,600m² (net) retail at an enhanced Brent Cross Shopping Centre which will be integrated into a new Metropolitan Town Centre.

Elsewhere, up to 67,00m² of office floorspace will be distributed across Barnet's town centres.

Major new public transport infrastructure is delivered at the new Brent Cross West station and West London Orbital, with potential for Crossrail 2 subject to confirmation.

New homes will be directed to the following locations:

- a) Growth Areas (23,300 homes):
 - Brent Cross Cricklewood Opportunity Area – 9,500 homes (Policy GSS02)
 - Brent Cross West– 1,800 homes (Policy GSS03)
 - Cricklewood Town Centre – 1,400 homes (Policy GSS04)
 - Edgware Town Centre – 5,000 homes (Policy GSS05)
 - Colindale Opportunity Area – 4,100 homes (Policy GSS06)
 - Mill Hill – 1,500 homes (Policy GSS07)
- b) District Town Centres – 5,400 homes (Policy GSS08)
- c) Existing and Major new public transport infrastructure (1,650 homes) (Policy GSS09):
 - London Underground and Network Rail stations and environs, including car parks – 450 homes
 - New Southgate Opportunity Area (potentially supported by Crossrail 2) - 250 homes
 - West London Orbital (WLO) support further intensification around the stations at Cricklewood, Hendon and Brent Cross West - 950 homes
- d) Estate renewal and infill (including Grahame Park) – 4,400 homes (Policy GSS10)
- e) Major thoroughfares – 3,350 homes (Policy GSS11)

- f) Other large sites including land at Middlesex University in Hendon and car parks – 2,800 homes (Policy GSS12)

Housing growth will come forward on small sites (5,100 homes) that are not designated in the Local Plan. This figure, based on previous trends for delivery from small sites, contributes towards meeting the overall housing target for the Borough. Small sites must be delivered in suitable locations that take account of planning designations and environmental restrictions, including avoiding areas at most risk of flooding. The Council will produce a Sustainable Design Guidance SPD that sets out area wide design codes for small site development⁷.

Where there is a compelling case to secure economic and social benefits in the public interest, the Council will be prepared to use its compulsory purchase powers to facilitate site assembly.

In ensuring the delivery of sustainable growth the Local Plan has allocated land for development as set out in Annex 1 – Schedule of Proposals. All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site proposals. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site.

4.9 Brent Cross Growth Area

- 4.9.1 Brent Cross Cricklewood is Barnet's largest and most significant area of regeneration. It is identified as an Opportunity Area in the London Plan with an indicative capacity of 9,500 new homes and 26,000 new jobs. The Council seeks comprehensive redevelopment of the area to provide thousands of new homes and jobs and transform supporting infrastructure.
- 4.9.2 The Brent Cross Cricklewood Opportunity Area covers 151 hectares, with proposals including a new commercial quarter and Metropolitan Town Centre, incorporating and connected to Brent Cross Shopping Centre. The Opportunity Area sits in close proximity to Growth Areas at Cricklewood Town Centre and Brent Cross West as well as the Staples Corner Growth Area in LB Brent.
- 4.9.3 Support for regeneration at Brent Cross Cricklewood has long been embedded in local and regional policy. The area was first identified as an Opportunity Area in the 2004 London Plan and the Council adopted the 'Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework' as Supplementary Planning Guidance (SPG) in 2005. The SPG establishes a series of strategic principles for the comprehensive redevelopment of the area. Policy support has continued through the Unitary Development Plan (UDP) (2006) and Local Plan Core Strategy (2012).

4.9.4 Based on the 2005 Development Framework outline planning permission was granted in 2010 for the comprehensive redevelopment of the whole of the Brent Cross Growth Area to create a new mixed use town centre with an additional 56,600m² of comparison retail floorspace; 7,500 new homes including affordable homes; a new commercial quarter with a forecast of over 20,000 new jobs, all underpinned by improvements to the strategic highway network, a new rail station as part of an improved and accessible public transport offer all encompassed within new high quality public realm. In 2014 a revised Section 73 planning application was approved making changes to the development around Brent Cross Shopping Centre and the phasing of the development. Since then detailed designs have been approved through reserved matters for the first phases of housing, retail, new infrastructure, a new public park and public spaces.

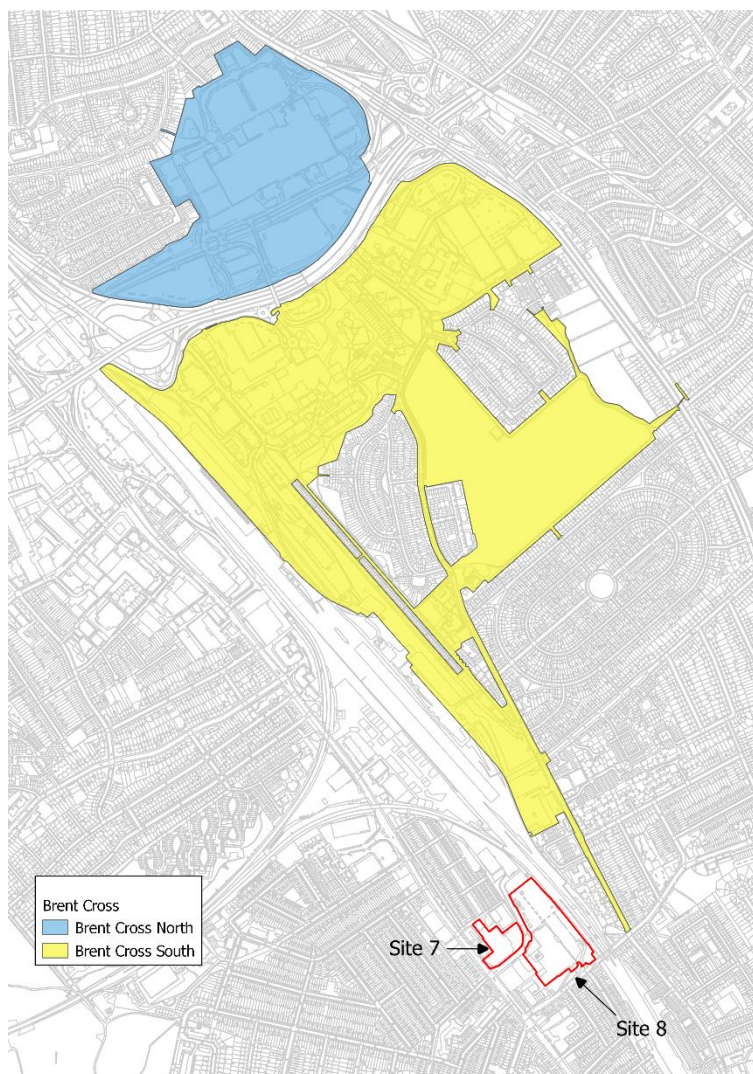
4.10 Comprehensive Development

4.10.1 The Council will seek the comprehensive regeneration of the Brent Cross Growth Area.

4.10.2 In general planning and regeneration terms, comprehensive development reflects an area that is planned to ensure the development of strategic sites is undertaken in a coordinated way, with the goal of improving and regenerating the area. It is usually applied to large or complex developments which are delivered over many years and which require land to be assembled to enable the development to be delivered, either by the Public Sector, other agencies or Developers.

4.10.3 The regeneration of the Brent Cross Growth Area is being delivered in three parts: Brent Cross North, Brent Cross Town, and Brent Cross West (Thameslink). These three areas are in different land ownerships and are being delivered separately by the Council and different development partners. Therefore, the Council will seek to ensure that development and delivery of these strategic areas is co-ordinated to ensure that comprehensive development is delivered. This entails that the development and delivery of these strategic areas is not delayed or fettered by the other but at the same time development proposals must demonstrate how they fit with the overall vision for the Brent Cross Growth Area and assist with achieving the delivery of the comprehensive whole.

4.10.4 Brent Cross North and South Brent Cross Town within the Brent Cross Growth Areas are as shown in Map 3. Brent Cross West is illustrated by Map 3A.

Map 3 Brent Cross Growth Area

4.11 Brent Cross North

4.11.1 The northern part of the Brent Cross Growth Area is being delivered by Hammerson and Aberdeen Standard Investments. This part of the regeneration area to the north of the A406 (North Circular) is based around Brent Cross Shopping Centre and has planning consent for a retail led mixed use development around the Shopping Centre with new retail stores and leisure facilities, a hotel, a significant food and dining offer and 800 new homes. The consent includes a variety of public spaces and a new riverside public park along the River Brent.

4.11.2 A replacement bus station as well as major highways infrastructure improvements to existing junctions are key requirements of the planning consent. Other infrastructure requirements include a new pedestrian 'Living Bridge' over the North Circular Road as well as replacement for the Tempelhoff road bridge to provide improved cycling and pedestrian facilities which will connect Brent Cross Shopping Centre to the rest of the new town centre to the south.

4.11.3 Implementation of this consent will deliver a major retail and leisure destination for North London with a range of uses contributing to the night-time economy.

4.11.4 The Secretary of State confirmed the Brent Cross Compulsory Purchase Order (CPO) 1 in December 2017 in relation to land needed for Brent Cross North to be delivered.

4.12 Brent Cross Town

4.12.1 The area south of the North Circular Road is being developed through a Joint Venture Partnership between the Council and Argent Related (BXS LP). Brent Cross Town comprises 72 hectares and will deliver 6,700 new homes comprising a mix of types and tenures, with a new high street and public squares at the centre of the development providing a mix of shops and restaurants set within a series of attractive public spaces. This new residential quarter will be supported by new and improved schools, community, health and leisure facilities, as well as improved parks and open spaces.

4.12.2 Outline consent is also in place for 395,000 m² of office space to create a new commercial quarter around the new Thameslink Station at Brent Cross West, as well as small business spaces adjacent to the new high street to support business start-ups.

4.12.3 Walking and cycling will be supported as priority transport modes through high quality public realm and cycling infrastructure. The new Brent Cross West station together with a new public transport interchange which will integrate new and existing bus services will transform public transport accessibility. Connections to Brent Cross Underground Station will also be enhanced through new streets within the development and improved links across the A41.

4.12.4 The Secretary of State confirmed Brent Cross CPO 2 in July 2018 for the land needed to deliver the first phases of Brent Cross Town. Detailed planning consent is in place for the first five development plots and construction work commenced in 2020.

4.13 Brent Cross West (Thameslink)

- 4.13.1 Working with public sector partners and Network Rail, the Council is delivering a new rail station 'Brent Cross West', which will support the area's regeneration and growth as well as provide new and existing residents with direct access to Thameslink rail services. The £416.5 million project to deliver the new Brent Cross West station and associated rail infrastructure will mean the new station is delivered much earlier than originally planned and will be opened and operational for the first development plots. and when completed (forecast for 2022) Brent Cross West will accommodate up to eight trains per hour with a journey time to Kings Cross St Pancras of less than 15 minutes. The new station will also provide a much-needed 24-hour pedestrian link across the railway lines which will open up access to neighbourhoods in LB Brent to the west.
- 4.13.2 To facilitate delivery of the new station, the Council is also delivering replacement waste transfer and rail freight facilities along with replacement rail sidings.
- 4.13.3 CPO 3 was confirmed by the Secretary of State in May 2018 for all the land needed to deliver the new station and associated rail infrastructure. The construction of new sidings and rail systems began in 2019 with the new South Sidings being commissioned into use in January 2021. Development of the new Brent Cross West station began in September 2020 and is expected to open in 2022.

4.14 **Sequence of Delivery within the Brent Cross Growth Area**

- 4.14.1 The original Development Framework from 2005 and planning permissions from 2010 and 2014 for the regeneration area assumed that the expansion of Brent Cross Shopping Centre would be delivered first along with significant changes to the highway infrastructure in the area. Development of housing and the commercial district to the south would then follow.
- 4.14.2 However, since detailed designs for the expansion of Brent Cross Shopping Centre were approved in 2017 the UK retail market has been experiencing significant structural and conceptual changes, with the closure and consolidation of major national stores and brands and the continuing competition from on-line retail. Given this economic uncertainty, the Brent Cross North development partners made a decision in 2018 to defer a start on site for the Brent Cross Shopping Centre development. The COVID19 pandemic has further accelerated this change and compounded the uncertainty around investment in major retail expansion.
- 4.14.3 Whilst recognising the economic challenges around the retail market, delivery of housing, jobs and the associated regeneration within Brent Cross Town remains a key priority for the Council and for London. This is reflected in the Government's decision to commit grant funding to enable the delivery of the new Brent Cross West Station that will support and help accelerate the delivery of new housing.

- 4.14.4 The Brent Cross West station provides a fundamental component of the integrated transport strategy to enable and accommodate the wider Brent Cross Growth Area development proposals to come forward; encouraging a significant mode shift to public transport as part of the comprehensive development of the area.
- 4.14.5 The Council is also delivering a package of critical infrastructure works that are funded by central government grant as part of the revised funding agreement for Brent Cross Cricklewood. These comprise two key junction improvements on Cricklewood Lane and one on Tilling Road. The improvements to Claremont Road / Cricklewood Lane junction were completed in 2020 with the improvement to Cricklewood Lane / A5 Edgware Road due to be completed in 2021.
- 4.14.6 BXS LP is continuing with the development of Brent Cross Town. Significant progress has been made with detailed consent in place for five development plots, a public square and new neighbourhood park. Main works commenced in 2020 with demolition and ground preparation as well as the works to create Claremont Park and deliver the first development plots and roads. The first residential completions are expected in 2024/2025.
- 4.14.7 The sequence of the development in the Brent Cross Growth Area has therefore changed in recent years with Brent Cross Town and the new Brent Cross West station now coming forward ahead of development around Brent Cross Shopping Centre in Brent Cross North. The early delivery of critical infrastructure and the commencement of Brent Cross Town will assist the future delivery of development at Brent Cross North and ensure that comprehensive development of the Growth Area is achieved.
- 4.14.8 Notwithstanding the significant changes in the retail market, evidence indicates that the larger, more dominant centres will continue to be the focus for activity for consumers and tenants, with consumers looking for a stronger 'experience' as part of their visit. Brent Cross Shopping Centre has an established and important role within the overall hierarchy of centres in Barnet and North London. It predominantly provides a high order comparison goods destination for local residents and those coming from a wider catchment area. It is a location recognised to already attract a large number of shopping trips. It remains an appropriate location for additional comparison goods retail and other main town centre uses to support the creation of a new Metropolitan town centre at Brent Cross Town.
- 4.14.9 Brent Cross Growth Area, especially Brent Cross North, will continue to represent an appropriate location to focus retail and related leisure and entertainment activities and will continue to be attractive to both customers and tenants. It is important that development around Brent Cross Shopping Centre primarily supports the creation of a destination attraction including a range of uses contributing to the night time economy.

4.15 Responding to Future Changes and Challenges

- 4.15.1 Delivering comprehensive development of the Brent Cross Growth Area will be dependent on factors relating to land ownership, viability and phasing, all of which can have an impact on the timing and sequence of delivery. The scheme is expected to take over 20 years to deliver and will therefore need to deal with and respond to changes in economic, market and technological conditions over this time. The existing outline planning permission, originally approved in 2010, is now nearly a decade old and whilst it is has flexibility to allow the phasing and delivery sequence of the development to be adjusted, it is expected that it will need to be supplemented through further planning applications to update areas of the masterplan as it is evolved and as the development responds to updated market and policy shifts.
- 4.15.2 To enable this, the Council's approach is to create a sufficiently flexible planning policy framework for the Brent Cross Growth Area capable of responding to change in the long-term and to deliver a successful and sustainable scheme. To support future planning applications within the Growth Area, the Council will review the 2005 Cricklewood, Brent Cross and West Hendon Development Framework and introduce a new Development Framework for the area to reflect the updated masterplan and respond to changing circumstances around the Brent Cross Shopping Centre.
- 4.15.3 In order to achieve comprehensive development of the Brent Cross Growth Area the Council will seek to ensure that development of the different strategic areas is co-ordinated. All developers will be expected to contribute towards the cost of delivering infrastructure within and associated with the Brent Cross Growth Area. Planning applications for new or revised developments within the Brent Cross Growth Area will be expected to contribute to the funding and delivery of infrastructure through Section 106 agreements and CIL. Where appropriate, the Council will secure contributions towards the retrospective costs of infrastructure delivered in earlier phases of the development. The Council will review its CIL charging schedule and may consider a specific CIL rate from developments in the Brent Cross Growth Area.
- 4.15.4 The Local Plan will establish a series of indicators to monitor progress on Brent Cross Growth Area and set appropriate milestones for assessing the delivery of the regeneration and setting out the stages where a review of GSS02 or introduction of a new planning framework may be necessary to further comprehensive redevelopment.

POLICY GSS02 Brent Cross Growth Area

The Council supports comprehensive regeneration of Brent Cross Growth Area to deliver a new Metropolitan Town Centre providing a range of uses including new homes, a new commercial office quarter, an expanded retail offer, destination leisure and entertainment, cultural and arts facilities, restaurants and hotels supported by an extensive programme of infrastructure investment over the Plan period.

Development proposals within the Growth Area must:

- Demonstrate how they assist in achieving and not undermining comprehensive development of the area;
- Contribute towards the creation of a Metropolitan Town Centre;
- Support the provision of a minimum of 9,500 new homes including a mix of tenures and types of housing;
- Protect and where possible improve the amenities of existing and new residents;
- Create a high quality, safe and attractive environment accessible to all;
- Create an integrated network based on the Healthy Streets approach of pedestrian and cycle routes through high quality public realm and open spaces to meet leisure, access, urban design and ecological needs;
- Provide sufficient community infrastructure, including new and expanded schools and primary healthcare capacity;
- Ensure the restoration and enhancement of the River Brent and its corridor to provide both public amenity and biodiversity benefits to the area and to fully connect to the Welsh Harp (Brent Reservoir) and West Hendon Playing Fields;
- The Brent Cross Growth Area will also deliver a new waste management facility to replace the existing Hendon Waste Transfer Station operated on behalf of the North London Waste Authority.
- Meanwhile uses will be permitted where it can be demonstrated that they support the comprehensive development of the area.

New Metropolitan Town Centre

The new Metropolitan Town Centre, extending north and south of the North Circular Road, will provide a range of uses, including retail, leisure and entertainment, cultural and arts facilities, restaurants, hotels, homes, business units, community facilities all within new neighbourhoods designed within a public realm that is green, safe and welcoming to all.

A new commercial quarter focussed around the new Brent Cross West rail station will provide 395,000m² of office development for over 20,000 new jobs. This will deliver the largest area of new space for economic growth in Barnet. There will also be support for creation of spaces for small and start-up businesses.

Brent Cross Shopping Centre will be enhanced and integrated as part of the new Metropolitan Town Centre and will deliver a range of leisure and other uses to ensure that it acts as a regional destination and contributes to a vibrant and viable night-time economy. The shopping centre will be connected to a new high street to the south via new pedestrian and vehicular bridges over the North Circular. Development at Brent Cross Shopping Centre is required to deliver measures to increase access to the town centre by means other than the private car. This should be reflective of up to date mode targets.

Transport Improvements

Development proposals will need to bring forward the following through detailed design, planning conditions and/ or Section 106 agreements:

- Prioritise pedestrian and cycle routes throughout the new development and improvements to pedestrian and cycle connections and routes beyond the development area;
- Ensure good access for disabled persons throughout the area with step-free access at Brent Cross Underground and Brent Cross West stations.
- A new rail station (Brent Cross West) on Thameslink line supported by a public transport interchange;
- A new bus station north of the North Circular Road as part of the expansion of Brent Cross Shopping Centre, with associated improvements to the local bus infrastructure;
- Connections and/ or improvements to the strategic road network, that are supported by Transport for London in relation to the TLRN (TfL Road Network), and Highways England in relation to the M1 motorway, based on up to date mode share targets;
- Appropriate new and multi-modal transport links to and within the development including at least one link across the North Circular Road and at least one crossing over the railway to the Edgware Road; Improve pedestrian access across the A41 Hendon Way to link with Brent Cross Underground Station; and,
- A new rail freight facility to replace the existing Strategic Rail Freight Site.

The Council will secure contributions from developers towards the retrospective costs of infrastructure delivered in earlier phases of the development. Where appropriate the Council will use CIL to deliver strategically important highways infrastructure.

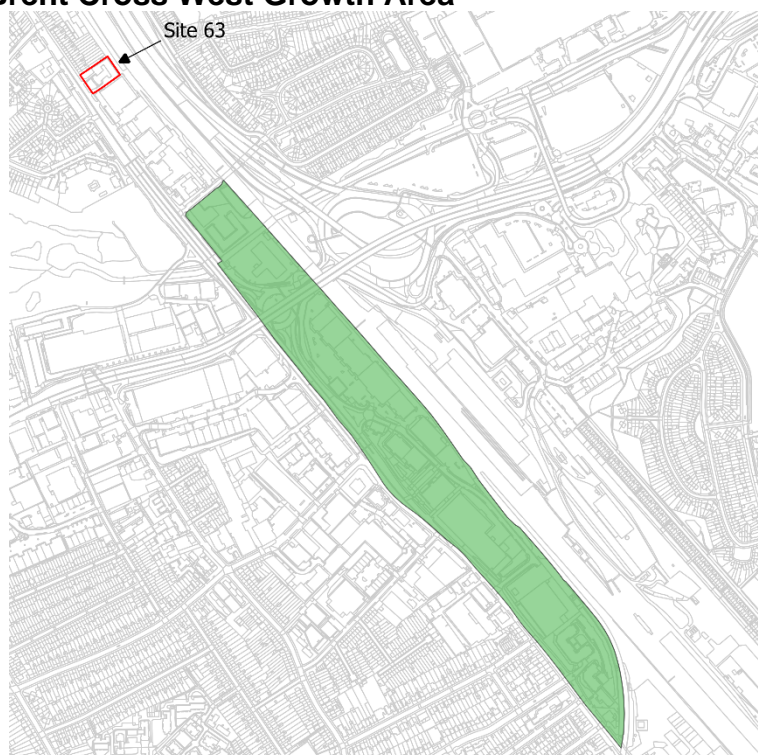
Progress of Brent Cross

The Local Plan will establish a series of indicators to monitor progress on Brent Cross. It will set appropriate milestones for assessing the delivery of the regeneration and setting out the stages where a review of GSS02 or introduction of a new planning framework may be necessary to further comprehensive redevelopment.

The Council seeks comprehensive development of the Brent Cross Growth Area. Brent Cross North and Brent Cross Town remain in different land ownerships and the Council will seek to ensure that development and delivery of these strategic areas is co-ordinated. This entails that the development and delivery of these strategic areas is not delayed or fettered by the other.

4.16 Brent Cross West Growth Area

- 4.16.1 The location of the Brent Cross West area adjacent to the planned new station on Thameslink is an opportunity for renewal to provide intensification and an improved mix of uses, including residential. The scale of the opportunity and its emerging connectivity support Brent Cross West as a Growth Area.
- 4.16.2 As illustrated by Map 3A Brent Cross West lies along the western boundary of the Borough and consists of large-scale retail sheds and associated car parking which are located between the A5 Edgware Road and the Midland Main Line / Thameslink railway.
- 4.16.3 Together with the Staples Corner Retail Park, Bestway Cash and Carry and the sites along the A5 to the north of the Staples Corner junction, this area represents a new growth opportunity supported by improved public transport and east/ west access at Brent Cross North.
- 4.16.4 The new Thameslink station at Brent Cross West will transform public transport accessibility to Staples Corner and open up the potential for regeneration and intensification along this corridor, including residential development on appropriate sites. Given the existing uses in the area and the physical environment, there are opportunities for development typologies that deliver a mixture of new light industrial and employment floorspace to the north of Staples Corner. The potential for co-location with residential development will be considered where the environmental conditions are appropriate. There is much potential for a beneficial interrelationship between Brent Cross West and the wider Brent Cross Growth Area, and opportunities for connectivity between the two should be maximised.
- 4.16.5 The planned West London Orbital route that will pass through this location with a station stop proposed at Brent Cross West, will further increase connectivity and PTAL values to support additional growth.

Map 3A - Brent Cross West Growth Area

4.16.6 Development sites around the new Brent Cross West station will be expected to provide new public open space alongside new public transport interchange facilities and new pedestrian and cycling connections to the station and to support connectivity and accessibility. Geron Way will need to be widened and upgraded to accommodate new and extended bus services to the new interchange and Brent Cross West as well as access to the future West London Orbital station.

4.16.7 The existing strategic highway network in the area is already congested with the junction between the A406 and the A5 at Staples Corner at capacity at peak times. Any additional development capacity will therefore be significantly restricted until a scheme for the improvement of this junction is secured. The Council will work with TfL and LB Brent to agree a scheme for improving the junction. Alternative mitigation measures such as public transport enhancements could also enable housing delivery.

4.16.8 The Brent Cross West Growth Area adjoins the Staples Corner Strategic Industrial Location in LB Brent which is identified in the Brent Local Plan as a growth area for industrial intensification and potential housing delivery. Therefore, the Council will seek to develop plans for growth in cooperation with Brent Council and ensure that a coordinated masterplan for the area is prepared. All developments on sites within the Brent Cross West Growth Area and the adjoining Staples Corner Growth Area in Brent will be expected to contribute proportionately towards the cost of delivering the infrastructure improvements necessary to support this growth.

POLICY GSS03 Brent Cross West Growth Area

To deliver growth and regeneration at Brent Cross West, the Council will support proposals which optimise density, infrastructure and jobs, while improving the amenity of the area.

Residential development should be directed towards the area around the new Brent Cross West station and away from the major road infrastructure, particularly the North Circular Road. Light industrial and commercial developments can be used as a buffer against noise pollution from major road infrastructure.

The Council will seek to prepare a more detailed planning framework for this area, such as through a Supplementary Planning Document, potentially through joint working with LB Brent.

The Council will seek the following level of development:

- **1,800** new homes, with the potential to increase further upon delivery of the West London Orbital (WLO);
- Retain existing levels of employment and pursue opportunities for new jobs including innovative typologies that deliver light industrial uses and employment floorspace alongside appropriate new residential uses;
- Appropriate levels of floorspace for community, retail and commercial uses.

The Council will support development proposals that facilitate access to and delivery of the West London Orbital.

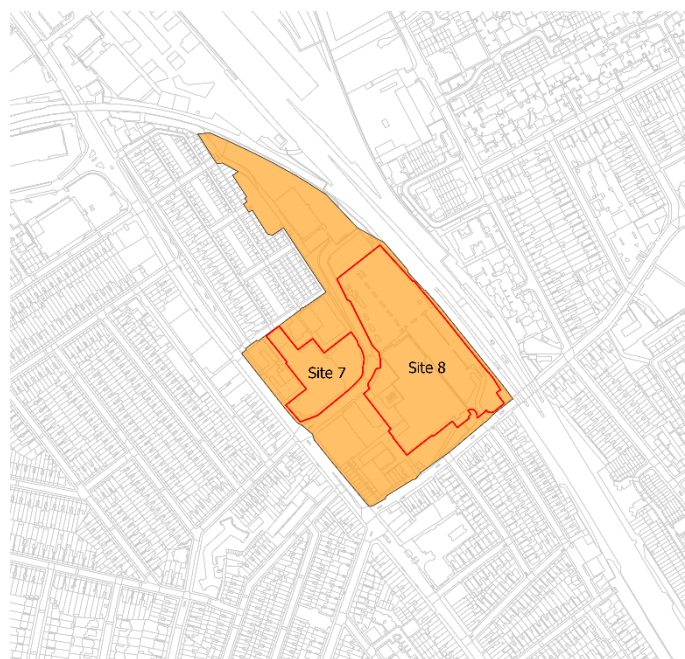
Development proposals will need to bring forward the following through detailed design, planning conditions and/ or contributions secured through Section 106 agreements:

- A comprehensive scheme for the improvement of the junction between the A5/Edgware Road and A406/North Circular supported by Transport for London in relation to the TLRN;
- New and improved pedestrian and cycle routes to the new Brent Cross West Station including from the Edgware Road and along Geron Way;
- Facilities for public transport interchange outside the new Brent Cross West Station on Geron Way with associated improvements to the local bus infrastructure;
- New public square at Brent Cross West Station and improved public realm along the A5 Edgware Road.

4.17 Cricklewood Growth Area

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- 4.17.1 Cricklewood town centre lies on the A5 / Edgware Road major thoroughfare in the south west of the Borough. The town centre is considered to provide a good range of shops, eateries and services, making it a popular place to shop, visit and live.
- 4.17.2 Cricklewood is well-connected with an overground station that provides trains directly to Central London, making this a good location for commuters. Multiple bus routes provide links with the surrounding areas.
- 4.17.3 Trends in economic activity towards online shopping has led to Cricklewood experiencing a decline of high-street retailers, in common with many other town centres. Cricklewood will need to respond with a more flexible approach to town centre uses.
- 4.17.4 Map 3B shows the area around Cricklewood Town Centre that has been identified as a Growth Area. Cricklewood is one of Barnet's main town centres, a location prioritised for improving its offer due to its larger scale and economic gravity, in particular as employment hubs for small to medium businesses in comparison to other Barnet town centres. Whilst Cricklewood Broadway retains high quality historic frontages and vibrant town centre functions, there is unused and underused land between the Broadway and Cricklewood station to the east. This includes the Broadway Retail Park a site of extensive car parking and low-rise buildings - but which has excellent public transport links from Cricklewood Station and bus routes along the A5 - has considerable potential for intensification. Map 3B highlights proposals sites in the Cricklewood Growth Area, further details of which are set out in Annex 1 - Schedule of Proposals.
- 4.17.5 Traffic congestion is an issue in Cricklewood, and the Council will utilise the Mayor's Healthy Streets Approach, through seeking an improved street environment for pedestrian and cyclists and supporting the use of public transport
- 4.17.6 The West London Orbital line has the potential to further increase capacity at Cricklewood. The Council will work with LB Brent and LB Camden in developing a more detailed planning framework for Cricklewood.

Map 3B Cricklewood Growth Area



POLICY GSS04 Cricklewood Growth Area

Cricklewood Town Centre is a location which the Council has prioritised for improving its offer to enable a diverse and thriving town centre. The Cricklewood Growth Area provides an opportunity for regeneration and intensification, supported by high existing PTALs and planned future transport infrastructure improvements, along with the availability of substantial under-used sites. The impact of the COVID19 pandemic means that developments should be aligned with the Council's Covid-19 Recovery Programme. The Council will support planning proposals that optimise residential density on suitable sites while delivering improvements to the amenity of the area and overall offer of the town centre.

To deliver growth and regeneration at Cricklewood, the Council will seek the following from development across the Growth Area:

- **1,400** new homes, with the potential to increase further upon delivery of the West London Orbital;
- Increase levels of workspace and pursue opportunities for new jobs;
- Appropriate floorspace for community, retail and commercial uses.

The Council will support development proposals that facilitate access to and delivery of the West London Orbital.

The Council will seek to prepare a more detailed planning framework for this area, such as through an Area Action Plan or Supplementary Planning Document, potentially through working with LB Brent and LB Camden.

4.18 Edgware Growth Area

4.18.1 Edgware has evolved from a small market town into a major town centre and a well-known suburban hub of North London. The centre is situated in the north-west corner of Barnet and extends into a small part of Harrow. Edgware has a long and proud history. The town centre is popular, diverse and valued, providing extensive shopping, cafes, restaurants and services for communities in both boroughs and beyond.

4.18.2 The presence of Edgware Underground Station at the end of the Northern Line, along with Edgware Bus Station, make it a public transport hub. People use the buses and tube to access Edgware for shopping, leisure and work, while commuters can travel directly to Central London.

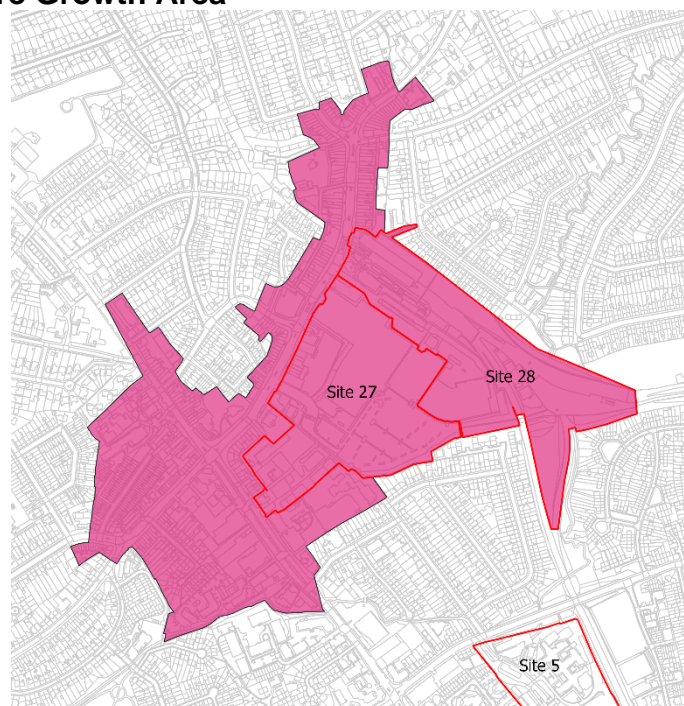
4.18.3 The Town Centre is an important commercial driver of the local economy and provides a range of important employment opportunities, largely in high street retailers and office work.

4.18.4 Edgware is identified in the Growth Strategy as one of Barnet's main town centres, a location prioritised for improving its offer due to its larger scale and economic gravity, in particular as employment hubs for small to medium businesses in comparison to other Barnet town centres.

- 4.18.5 Edgware has attractive inter-war shopping frontages, along with many nationally and locally listed buildings across the town centre. Edgware has a long and interesting history which is reflected in important heritage buildings that provide distinctive designs and links to the past. These advantages are reflected in the designation as a Growth Area, the extent of which is set out in Map 3C.
- 4.18.6 Despite its advantages the town centre has experienced a range of pressures in recent years like many town centres and high streets nationally. In common with similar town centres there has been a significant shift in retail resulting in the loss of major retail anchors as more people have moved to shopping online or attracted to out of town retail centres as they expand their offering.
- 4.18.7 Edgware Town Centre hosts a range of non-retail uses, including a significant amount of office space for professional and commercial services. There are diverse community uses such as buildings for community organisations, education, healthcare, religious uses, and a library. There is also a presence of leisure uses including a fitness gym.
- 4.18.8 To secure its status as a major town centre within the London Plan hierarchy of town centres, Edgware needs a sustainable response to a changing world. There must be compelling reasons for people to choose to visit and stay in the town centre, generating a positive and self-sustaining circle of renewal. Edgware can draw on its unique character and features while seeking new offerings to enhance the town centre's appeal and support its businesses. Edgware has an enormous opportunity to significantly improve its leisure and cultural experience to draw more people to the town centre during the day and evening. This could mean more entertainment such as a cinema, increased eating out options, and leisure such as sports activities.
- 4.18.9 The Edgware town centre experience can be greatly improved for pedestrians and cyclists through improvements to the street environment and dedicated routes. While public transport access is already good, the relationship of the tube and bus facilities with the surrounding town centre could be made much better. There will continue to be provision of car parking spaces for town centre users.
- 4.18.10 Local employment opportunities can be greatly expanded through delivery of workspaces for business start-ups and SMEs (Small & Medium Enterprises). Improving Edgware's economy and job environment will reduce the need to travel into central London and will draw wealth creation into the local area. Flexible employment floorspace should be provided and people helped to get the right level of skills to fully access the jobs market.

- 4.18.11 Edgware Town Centre has high levels of public transport connectivity due to the Northern Line station and a dense network of bus linkages. As the only major town centre within the Borough, Edgware provides a strategic role in terms of retail, leisure and employment provision. There is significant scope for improving the leisure and night-time economy offer; Barnet's TCFNA forecast significant levels of food and drink expenditure growth in Edgware. This can be met though increasing the provision of bars, cafés and restaurants. There is also scope for a new cinema complex and swimming pool, which will provide a step-change to the local leisure offer.
- 4.18.12 While the public transport linkages are good, the bus and rail stations integration with the town centre and surrounding areas could be improved. The bus access in particular conflicts with pedestrians. The public realm is generally poor, being crowded, clustered and noisy. There is very limited public outdoor space for sitting or socialising.
- 4.18.13 Extensive areas of surface parking, a low-rise shopping centre and the rail and bus station areas provide significant potential for regeneration and intensification. Map 3C highlights proposals sites within the Growth Area. Further detail on these sites is set out in Annex 1 - Schedule of Proposals.
- 4.18.14 The Council has developed a new Supplementary Planning Document in conjunction with LB Harrow to provide a new and more comprehensive planning framework for Edgware to realise its capacity. A goal of any new framework is to ensure that growth acts to directly enhance and supports the existing Edgware Town Centre.

Map 3C - Edgware Growth Area



POLICY GSS05 Edgware Growth Area

Edgware Town Centre is identified as an opportunity for regeneration and intensification, supported by high existing PTALs reflecting its potential to become an Integrated Transport Hub.

The Town Centre can be used far more effectively to support growth and enable the recovery from the Covid-19 pandemic.

The Council will support planning proposals that optimise residential density on suitable sites while delivering improvements to the amenity of the area.

To deliver growth and regeneration at Edgware Town Centre, the Council will seek the following from development proposals:

- **5,000** new homes;
- Improved leisure options such as a new cinema, swimming pool and new eating-out options;
- Appropriate floorspace for community, retail and office uses;
- Improved public realm, including new public spaces;
- Transformation of the relationship between the rail and bus stations and the wider town centre to improve the pedestrian experience and reduce congestion;
- Retain existing levels of employment and pursue opportunities for new jobs.

The Council has prepared a more detailed planning framework Supplementary Planning Document for this area, working in conjunction with LB Harrow.

4.19 Colindale Growth Area

4.19.1 The Colindale Growth Area is delivering a well-connected and affordable location serving as a sustainable place to rent and buy for a diverse and changing population. A place where cycling, walking and public transport have become the preferred mode of travel. Colindale is at the heart of the Council's vision to sustainably address the need for homes and jobs for Barnet's growing population, whilst protecting and getting the best from the Borough's heritage and extensive open spaces.

4.19.2 The Colindale Growth Area as shown in Map 3D covers 200 hectares and is identified as an Opportunity Area in the London Plan. The Area Action Plan 2010 highlighted potential for a total of over 10,000 new homes, of which 4,000 have already been delivered, making Colindale the largest contributor to housing and affordable housing in the Borough and one of the biggest in North London.

4.19.3 Colindale continues to deliver new homes with a development pipeline of over 6,000 units, 4,100 of which are within the Plan Period. The scale of regeneration in the area means that housing delivery must be accompanied by investment in transport, education, health, leisure, open spaces, green corridors and new employment opportunities.

- 4.19.4 Transport and movement are vital to the sustainable development of Colindale and developments should:
- Deliver improvements to support the Mayor’s Healthy Streets Approach of a modal shift away from the private motor vehicle to more sustainable modes such as public transport, cycling and walking;
 - For all developments within 1km distance of Colindale station to contribute towards station improvements, potentially including but not limited to delivery of step-free access and capacity enhancement, and provision of additional cycle parking;
 - Contribute towards bus priority improvements at junctions, provision of bus lanes along bus corridors, service frequency improvements, and/or supporting infrastructure including bus stations, bus garages and/or bus stands.
- 4.19.5 The regeneration process has already seen significant progress with infrastructure projects and improvements to the public realm. Barnet and Southgate College has been relocated to Bristol Avenue in a newly-built campus, incorporating a new library and Centre for Independent Living. This is adjacent to new purpose-built offices for the Council. A new youth facility opened at Montrose Park in June 2019.
- 4.19.6 Colindale will benefit from the economic boost of becoming the local hub for public sector jobs. Employee expenditure can help boost the local economy, particularly in terms of cafes and restaurants, supporting the new Local Centre at Colindale Gardens.
- 4.19.7 Colindale is also home to the RAF Museum, an asset which has potential to enhance the area’s role as a visitor destination, as highlighted in the Growth Strategy.
- 4.19.8 Colindale’s future growth is focused on the following key areas:
- Colindale Underground Station – renewal of the station and intensification to take advantage of the high PTAL;
 - Grahame Park – large-scale regeneration of the Estate;
 - Colindale Gardens – land made available from consolidating the Metropolitan Police training centre (Peel Centre);
 - Redevelopment of student housing at Platt Hall that is sympathetic to the context and character of the Grade II Listed Writtle House;
 - Redevelopment of the Public Health England (PHE) site (Proposal No. 13) on Colindale Avenue is expected to come forward with the relocation of PHE to Harlow in 2025.
- 4.19.9 Map 3D highlights proposals sites in and around the Colindale Growth Area, further details for which are set out in Annex 1 - Schedule of Proposals.
- 4.19.10 A policy framework for Colindale has been established through the following planning documents:
- Colindale AAP (2010)

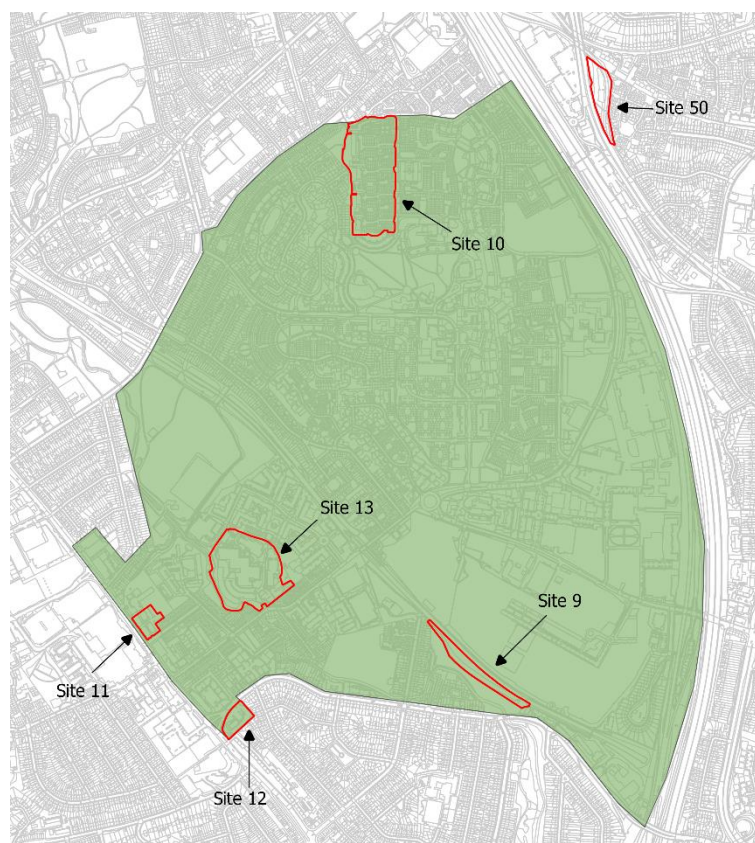
- Grahame Park SPD (2016)
- Colindale Station SPD (2019).

4.19.11 While public transport access for the Growth Area is provided by the Colindale underground station, along with bus services, accessibility to the area is affected by the physical barriers of the M1, Midland Mainline railway and Northern line which together restrict access points to the Growth Area.

4.19.12 Colindale Avenue provides a linkage into the Growth Area from Edgware Road (the A5) to the west. Colindale Avenue, however, suffers from several issues including the prevalence of on-street parked cars, a narrow roadway and pavements, a lack of cycling infrastructure, and a poor junction with Edgware Road. Improvements to key junctions and roads, including pedestrian and cycle linkages, together with an improved public realm are required.

4.19.13 The town centres of Colindale The Hyde and Burnt Oak are in proximity to the Colindale Growth Area and have an important part to play in supporting and benefiting from the success of the area. These town centres are shared with London Borough of Brent with whom the Council will work to ensure the effective renewal and growth of these places. This includes new housing, economic growth, and enhancing character, identity and heritage assets.

Map 3D - Colindale Growth Area



POLICY GSS06 Colindale Growth Area

The Colindale Growth Area provides the opportunity to create a more sustainable place that actively demonstrates a Healthy Streets Approach where cycling, walking and public transport are the preferred mode of travel. The Growth Area has capacity to deliver **4,100** new homes between 2021 and 2036. This includes development at Colindale Gardens, Colindale Underground Station and Public Health England. New homes at the Grahame Park Estate are considered in Policy GSS10.

In addition to new homes delivery the Council expects the following to be delivered:

- New Local Centre at Colindale Gardens including nursery provision and health-care facilities
- New Colindale Underground station with step-free access and sufficient gate-capacity for the growing population in the area. All development within 1km of Colindale Underground station will be expected to contribute towards station improvements, including step-free access and capacity enhancement, and provision of additional cycle parking;
- Improvements to open spaces which enhances the amenity, biodiversity and makes provision for play space, including at Colindale, Montrose, Rushgrove and Silkstream Parks;
- Improvements to key junctions and roads, including pedestrian and cycle linkages, together with an improved public realm, along Colindale Avenue to Edgware Road;
- New development in Colindale should deliver improvements to streets and the public realm in line with the Healthy Streets Approach;
- Ongoing improvements to bus services, focusing on east west linkages with new development required to contribute towards supporting bus infrastructure including stations, garages, bus stands and lanes as well as bus priority improvements at junctions and service frequency improvements;
- Provide a new pedestrian and cycle route under the Northern Line to link Colindale Gardens to Colindeep Lane;
- Improving access between Colindale Park and Rushgrove Park by utilising land between Northern Line and the Silkstream for a new pedestrian and cycle route within a new open space;
- Development proposals to provide new community facilities and create a sense of place; Renewal and upgrade of primary school and secondary school at Grahame Park; and
- Control on-street parking through implementation of a new Controlled Parking Zone (CPZ) across the majority of the Colindale Growth Area.

Colindale development up to 2036 will be focussed at the following locations:

- Land at Colindale Underground Station will be redeveloped to provide a new, higher capacity, step-free access station that incorporates cycle parking;

- The Grahame Park Estate will be renewed and much better integrated with surrounding areas, delivering 2,760 new homes providing wider choice of housing type and tenure;
- Colindale Gardens where new homes will be accompanied by a new primary school, a new children's nursery, a new park, and a new primary health care facility;
- The Public Health England site where residential led development will re-integrate this site back into Colindale and reconnect the area with the Silk Stream;
- Middlesex University's Platt Hall be redeveloped in a manner which is sympathetic to the context and character of the Grade II Listed Writtle House, to provide an uplift in the number of student units on the site.

The Colindale Growth Area should help to support and link to the nearby town centres of Colindale The Hyde and Burnt Oak, enhancing their character and amenity, in coordination with LB of Brent.

4.20 Mill Hill East

4.20.1 The Mill Hill East area is a green, suburban location that includes the planning designations of Green Belt and the Mill Hill Conservation Area.

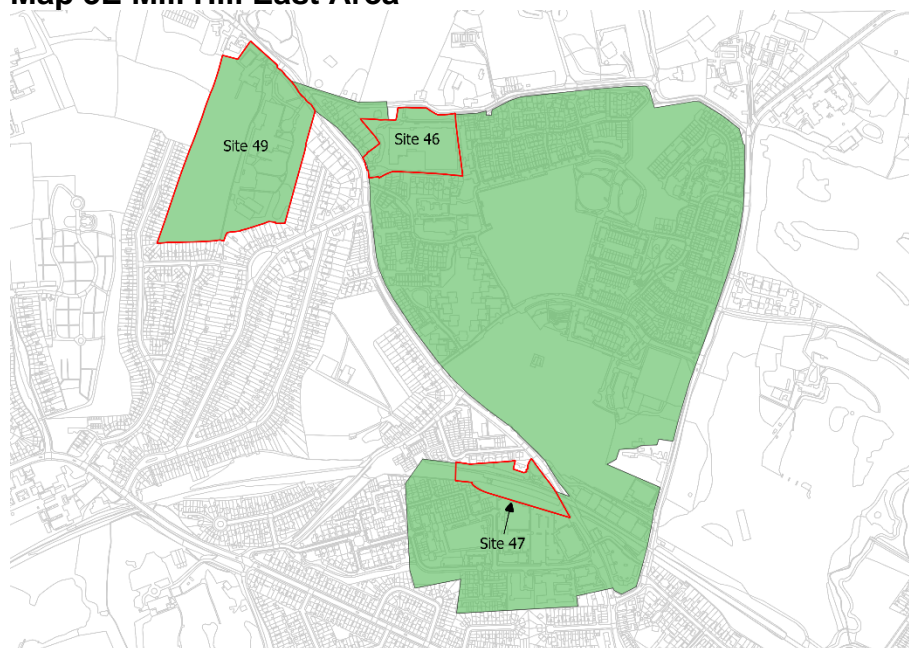
4.20.2 Mill Hill East was identified in the 2004 London Plan as an area of intensification. Such areas were defined as typically built-up areas with good public transport access which can support redevelopment at higher densities but at lower levels than areas such as Brent Cross and Colindale.

4.20.3 The 40 hectares of former RAF barracks and a former Council depot has been transformed to become a high-quality sustainable development. The planning consent in 2011 provides 2,240 new homes, a new 3-form entry primary school, local shops, a district energy centre and six hectares of parks and open spaces. Within the context of a green suburban location it is providing new homes and business opportunities with high quality community facilities, transport and access to open space, and provides an example of good suburban growth. Significant progress has been achieved at Mill Hill East, with delivery of 737 new homes, a new primary school, new public spaces, improved road junctions, and an extended bus route.

4.20.4 A planning framework for Mill Hill East was established with the Area Action Plan (AAP) adopted in 2009. Along with development at the former National Institute of Medical Research other development opportunities have emerged around Mill Hill East including Watchtower House, IBSA House and Mill Hill East station. These three sites are identified in the Schedule of Proposals at Annex 1. Development proposals must demonstrate careful consideration of any impacts on the Mill Hill Conservation Area and Green Belt.

4.20.5 Development proposals must demonstrate how sustainable modes of transport will be enabled, with the effects on traffic and transport fully assessed and mitigated as required.

Map 3E Mill Hill East Area



POLICY GSS07 Mill Hill East

Millbrook Park is making progress as an example of good suburban growth. The implementation of the 2011 planning consent following the adoption of the Mill Hill Area Action Plan in 2009 has already delivered 737 new homes, with the expectation of a further 1,529 units to be completed.

Within the wider area around Mill Hill East there is capacity to deliver 1,500 additional new homes.

The Council will positively consider proposals on suitable sites to deliver further good suburban growth, including at Mill Hill East Station, Watchtower House and IBSA House, which together could deliver around 547 new homes.

Proposals within Mill Hill East must be supported by a Transport Assessment setting out public transport improvements and demonstrating how sustainable transport options will be provided.

Development proposals must demonstrate careful consideration of any impacts on the Mill Hill Conservation Area and Green Belt designations.

4.21 **Barnet's District Town Centres**

- 4.21.1 Barnet has an extensive town centre network with a range of locations where appropriate renewal and regeneration can support the Borough's growth needs. Thriving town centres are essential for the Borough to grow sustainably and successfully. Barnet's Growth Strategy highlights those town centres that have been prioritised, for improving the town centre offer.
- 4.21.2 Retail continues to evolve as a multi-channel activity. Comprising a mix of physical stores, 'click and collect' points, direct delivery to homes and workplaces, and showrooms for digital businesses. This is a significant contributory factor to the decline in physical presence of shops on high streets, a trend that has been amplified by the Covid-19 pandemic.
- 4.21.3 Having a less restrictive framework that enables innovation is key to delivering thriving town centres and ensuring that they can provide destinations that offer a blend of commercial, community and cultural functions. Residential components within mixed use development in town centres can help contribute to vitality and viability by increasing trade for business and enhancing natural surveillance and activity throughout the day and night-time. Such locations also offer their residents ready access to town centre based services and facilities including public transport, reducing the need to travel by car. Developments must ensure that the design of proposals is suitable for the town centre context while providing amenity for the new residents such as providing access to open space and minimising exposure to traffic noise. An approach of site infilling and intensification supported by Design Guides will enable town centre locations to contribute towards the Borough's growth needs.
- 4.21.4 In order to be successful and thriving Barnet's town centres will have to adapt and take advantage of the increased flexibility provided by the 2020 radical overhaul of the Use Classes Order⁸.
- 4.21.5 Barnet's town centres are important locations not only for retail, but also provide a focus for community and family friendly activities and a sense of civic pride, often containing valued heritage assets. The importance of town centres as sites of employment is reflected in the Council's Article 4 Direction restricting the conversion of offices to residential. The renewal of town centres must balance growth needs with sensitive and high-quality design.
- 4.21.6 Within town centres new infill development is unlikely to afford significant amenity space within the curtilage of the site, and it is therefore vital that areas of publicly accessible open space are maintained or developed within or in close proximity to town centres, and that development proposals demonstrate existing or improved access to such spaces. Further guidance on the development of small sites will be provided by Design Guides.

4.21.7 Barnet's town centres will pursue an approach that aligns with the Mayor's Healthy Streets Approach, promoting active modes of travel and good public transport provision. This approach, combined with the immediate accessibility of the town centre functions, should allow residential development with car free or low parking provision. Space previously intended for car parking can be used more efficiently to contribute to the overall quality of the development.

POLICY GSS08 Barnet's District Town Centres

Barnet's Town Centres have a vital role in delivering sustainable growth and enabling recovery from the Covid-19 pandemic. Thriving town centres will support shopping and services, and provide a focus for cohesive communities, while delivering new jobs and homes.

Main Town Centres (Burnt Oak, Chipping Barnet, Finchley Central, Golders Green and North Finchley) will form the Council's priorities for investment and revitalisation, supporting local businesses and delivering mixed use development in accordance with the place making policies of the Local Plan and in alignment with the Mayor's Healthy Streets Approach.

The changes to the Use Classes Order (2020) remove restrictions on changes of use and allow greater flexibility for opportunities to change between town centre uses, supporting town centre vitality and viability.

The Council will support mixed use development within Barnet's town centres ensuring that their individual town centre offer responds to the needs of residents and workers as well as businesses and maintains their distinctiveness as places and vibrant hubs.

Barnet's Town Centres (excluding Cricklewood and Edgware) have potential to deliver a minimum of **5,400** new homes.

The Council will ensure that proposals for town centre development:

- a) achieve a high-quality design that enhances the visual amenity of the town centre;
- b) optimise residential density within the context of the town centre;
- c) manages acceptable levels of noise associated with town centre locations;
- d) do not have a negative impact on areas outside of the town centre;
- e) demonstrate suitable access to open space and, where appropriate, improves availability or access to an open space, as well as ensures continued maintenance;
- f) makes provision for community infrastructure;
- g) supports sustainable travel and seeks to minimise parking provision, including at zero provision where appropriate, and to not exceed established standards;
- h) Support active travel modes and the Healthy Streets Approach;
- i) make a positive economic contribution; and
- j) are not detrimental to the ongoing functionality of the existing town centre.

The Council will pursue the individual planning objectives for each town centre through utilising more detailed area frameworks such as Supplementary Planning Documents. While specific town centre sites are

identified in the Schedule of Proposals it is expected that further sites will come forward in response to the challenges of growth.

4.22 Existing and Major New Public Transport Infrastructure

4.22.1 The Borough is well served by existing overground and underground rail networks and is positioned to benefit from the major new transport projects of the West London Orbital (WLO) and potentially Crossrail 2. The rail stations provide well-connected nodes that can support growth and the delivery of housing.

4.22.2 The longer-term impacts of COVID19 are as yet unclear, but there is potential for more working from home. Nevertheless, proximity to public transport nodes is expected to remain a key support for growth as commuting and leisure trips are expected to return, albeit at a lower level than before. The TfL Streetspace Initiative sets out the approaches and priorities to creating a safer environment to enable movement around London.

4.23 West London Orbital (WLO) and Crossrail 2

4.23.1 The Council is supporting the major transport infrastructure projects of West London Orbital (WLO) and Crossrail 2, which have the potential to support transformation in areas of the Borough.

4.23.2 The WLO will deliver a passenger service along existing rail tracks between Hounslow/ Kew Bridge and Hendon/ West Hampstead Thameslink, passing through Old Oak Common, Neasden, Brent Cross West and Cricklewood. The WLO will have positive impacts through unlocking housing delivery and creating leisure, community and amenity opportunities along the corridor. Delivery is expected by 2026 at the earliest.

4.23.3 The proposed Crossrail 2 routes would directly connect north and south London while providing a continuous rail link beyond the capital into the southern and northern home counties. One of the northern spurs would connect to New Southgate. Although Crossrail 2 is subject to confirmation delivery would be towards the latter part of the Plan period. Whilst work on project development and seeking consent for the Crossrail 2 scheme has been paused, TfL continues to work with DfT on a suitable timetable for updating the safeguarding directions so that the latest Crossrail 2 design is protected from future development. This safeguarding refresh will include the alignment of the proposed New Southgate branch which is a part of the Crossrail 2 route that is not currently safeguarded.

4.23.4 Through further improving PTALs these major transport schemes will support residential led development around the station areas of New Southgate, Cricklewood, Hendon and the new station at Brent Cross West.

4.23.5 In response to uncertainty about major transport infrastructure the Council will monitor progress on the West London Orbital and Crossrail 2. It will also set appropriate milestones for assessing regeneration and the stages where a review of Policy GSS09 or introduction of new planning frameworks may be necessary to further comprehensive redevelopment.

4.23.6 With particular regard to the designation of New Southgate as an Opportunity Area in the London Plan, the Council will consider bringing forward a joint area planning framework with LB Enfield and LB Haringey. The boundaries of the Opportunity Area have not been formally defined but they will cross into LB Enfield and LB Haringey. If the Crossrail 2 project does not come forward, there will be a greater focus on opportunities in the area around the North Circular Road.

4.24 Existing Public Transport Nodes

4.24.1 Public transport nodes, particularly of underground and over-ground rail infrastructure, provide locations of higher PTALs that can support significant intensification and growth.

4.24.2 Barnet has 13 London Underground stations, all of them on the Northern Line. The Edgware branch serves the western side of the Borough with six stations, while the High Barnet and Mill Hill East branches serve the central and eastern areas with seven stations. With the support of TfL investment projects to improve key station interchanges and their relationship to town centres, alongside step free access, will enable these transport assets to better support local communities, unlock opportunities for development, and facilitate new jobs and economic growth.

4.24.3 The Borough is also served by six Network Rail stations. Three of these are on the Midland Main Line in the west of Barnet. The introduction of the new Brent Cross West Station will be a major improvement and, together with the new West London Orbital line, will be key to improving the connectivity of these locations to unlock further opportunities for growth.

4.24.4 The remaining three Network Rail stations are on the East Coast Main Line which runs through the east of the Borough. Subject to the arrival of Crossrail 2 in the latter stages of the Local Plan connectivity will be further improved at Oakleigh Park and New Barnet. However, further delays to the timescales for this investment may negatively affect opportunities for growth unless alternative transport improvements and investments can be delivered.

4.24.5 Many of Barnet's stations provide car parking facilities which comprise an open expanse of hard surfacing. These locations offer opportunities for redevelopment through utilising the high PTALs and other potential site characteristics such as town centre locations. The Council's expectation is that such sites will be developed primarily for residential uses, although in appropriate locations other uses with economic or community benefits, such as hotels, may be suitable. The required level of station car parking provision should be assessed in light of encouraging the use of public transport and active modes of travel, with car parking potentially re-provided through a more land-efficient design approach.

4.24.6 The level of growth possible will be informed by the context of each location in terms of urban form and heritage. To support the effective development of public transport nodes the Council will consider preparation of planning frameworks through SPDs, masterplans and site briefs, as required. While specific sites are identified by the Schedule of Proposals as set out in Annex 1 it is expected that further sites will come forward in response to the challenges of growth.

4.24.7 The stations not linked to a town centre which are expected to support development are:

- Mill Hill East
- New Southgate
- Hendon, and
- Brent Cross West (Under construction).

POLICY GSS09 Existing and Major New Transport Infrastructure

To deliver growth and regeneration at existing transport hubs and alongside major new transport infrastructure at New Southgate and West London Orbital, the Council will seek the following quantum of development across the area:

- **1,650** new homes;
- Retain existing levels of employment and pursue opportunities for new jobs;
- Appropriate floorspace for community, retail and commercial uses.

The Council will seek to prepare more detailed policy frameworks for these areas, such as through an Area Action Plan or Supplementary Planning Document, potentially through joint working where appropriate.

Major transport infrastructure upgrades

The potential major transport infrastructure upgrades of the West London Orbital (WLO) and Crossrail 2 would provide opportunities for growth in Barnet through developing new stations or upgrading the capacity of existing stations and allowing higher density developments to be achieved. Proposals on sites in proximity to these public transport improvements will be expected to deliver a density and quantum of residential units which optimise their potential.

West London Orbital (WLO) – potential for 950 new homes.

The Council will support development proposals that facilitate access to and delivery of the West London Orbital and contributions will be sought towards West London Orbital and public transport infrastructure. The Council will consider new planning frameworks to support comprehensive redevelopment in alignment with progress on the West London Orbital.

New Southgate and Crossrail 2 – potential for at least 250 new homes.

The Council will consider new planning frameworks to support comprehensive redevelopment in alignment with progress on Crossrail 2.

Existing Transport Hubs

Public transport hubs with high levels of PTAL in Barnet offer significant potential for intensification and growth.

The stations not linked to a town centre which are expected to support development are: Mill Hill East, New Southgate, Hendon and Brent Cross West (under construction).

Development at these public transport nodes will be supported, provided that the proposal:

- Enhances the capacity, access and facilities of the transport interchange;
- Demonstrates optimised density;
- Delivers residential uses, or otherwise demonstrates why uses with economic or community benefits are allowable;
- Supports active travel modes and the healthy streets approach;
- Avoids unacceptable levels of air and noise pollution for the new residents
- Is not detrimental to heritage assets; and
- Supports and, where appropriate improves, public access to open space and play space.

Where it is proposed to develop a station car park, the Council expects a demonstration of how the use of public transport and active modes of travel will encourage reduced car park usage. Existing provision must be assessed and replacement car parking may be supported through a more land-efficient design approach such as a multi-storey design.

4.25 Estate Renewal and Infill

- 4.25.1 Housing estate renewal and infill is an important element of the Council's existing growth and spatial strategy. There are parts of Barnet where the impacts of inequality and causes of deprivation are particularly concentrated. Such areas fall within the 20% most deprived areas in England. The London Plan defines such locations as Strategic Areas for Regeneration. Renewal and infill of the Council's own housing estates helps define Local Areas for Regeneration. This can provide opportunities for making a far more efficient use of land while greatly improving the standards of accommodation and quality of the urban form.
- 4.25.2 The Council has already progressed estate renewal, successfully regenerating housing estates such as Stonegrove. The estates have been subject to long term programmes of regeneration to tackle poor quality housing and social isolation and transform these areas into successful mixed tenure places that are integrated with their surrounding neighbourhoods. Many future schemes are focused more on infill and some small areas of redevelopment, rather than comprehensive demolition and renewal.
- 4.25.3 Regeneration must be undertaken in a partnership with Barnet Homes and Registered Social Landlords and in collaboration with local communities to develop a shared vision for the area. The re-provision of affordable housing is complex and estate regeneration must take account of the specific circumstances of each site, including local infrastructure needs, local housing need in respect of tenure mix, affordability and tenure size, place-making, viability and the nature of the surrounding area. Within the housing estate subject to regeneration the Council will ensure no net loss of affordable floorspace and with existing social rent tenants, facilitate their right of return to the estate into new social rent accommodation. Otherwise the Council will replace existing social rent housing with new affordable accommodation as London Affordable Rent or Social Rent.
- 4.25.4 The Council will work with the Mayor in ensuring that proposals are consistent with London Plan Policy H8 – Loss of Existing Housing and Estate Redevelopment. Proposals will take account of the requirements of the Mayor's Good Practice Guide for Estate Regeneration⁹. The Mayor's Guide provides detailed guidance for assessing appropriate approaches to estate regeneration. In particular, only once the objectives of an estate regeneration scheme have been formulated in consultation with residents, should the physical interventions required to achieve them be considered.
- 4.25.5 Housing estates at Upper and Lower Fosters, West Hendon, Dollis Valley, Granville Road, Westhorpe Gardens and Grahame Park are already undergoing or are scheduled to undergo, renewal or infill in full consultation with resident households.

POLICY GSS10 Estate Renewal and Infill

The Council working in partnership with Barnet Homes, Registered Social Landlords and the Mayor of London will continue its programme of estate renewal and infill to improve the urban form of housing estates in the Borough, making better use of underused land to provide better quality amenity space and 4,400 new homes.

The housing estates for renewal or infill include Grahame Park, Upper and Lower Fosters, West Hendon, Dollis Valley, Granville Road and Westhorpe Gardens.

The Council will:

- Replace existing affordable housing whilst considering the specific circumstances of each site;
- Ensure that an equivalent amount of affordable housing floorspace be provided as a minimum and seek an uplift in such provision;
- Support the right of return for existing social rent tenants from estates into new social rent accommodation. Otherwise the Council will provide the new affordable accommodation as London Affordable Rent or Social Rent;
- Integrate replacement affordable housing into the redevelopment to ensure mixed and inclusive communities.

The Council will continue to work in collaboration with local communities to develop a shared vision for schemes already underway in addition to those proposals highlighted in Annex 1 of the Local Plan.

Proposals will take account of the requirements of the London Plan Policy H8 – Loss of existing housing and estate redevelopment together with the Mayor’s Good Practice Guide to Estate Regeneration.

Redevelopment proposals must ensure the following requirements are met:

- Demonstrate improvement in the quality of the housing stock and the surrounding environment;
- Achieve a net increase of housing units;
- Consider the needs of existing households on the estate;
- Provision of housing tenure and mix according to the specific site needs, taking into account local housing need, local infrastructure need, the nature of the surrounding area, and viability;
- Ensure access to sufficient amenity space including open spaces and children’s playgrounds;
- Ensure access to sufficient supporting infrastructure where the impacts of development require mitigation. This may include but is not limited to child nurseries, schools, community centres, sport and leisure facilities, and healthcare;
- Design in active travel to promote walking and cycling and demonstrate sufficient access to public transport; and
- Provide an appropriate level of parking.

4.26 Major Thoroughfares

4.26.1 Across the Borough development is already coming forward on sites along major roads and a policy framework will allow this process to be managed more effectively. Major road corridors through Barnet provide, in certain cases, opportunities for infill and intensification. The Key Diagram highlights the major thoroughfares in the Borough. The Council will work with Transport for London (TfL) and Highways England to help find and deliver appropriate sites. The routes currently most suitable for this form of development are:

- A1000 Great North Road/ High Road;
- A598 Ballards Lane/ Regents Park Road / Finchley Road;
- A5 Edgware Road/ Watling Street;
- A504 Hendon Lane; and
- A110 East Barnet Road.

4.26.2 A good level of bus service underpins a high level of public transport access and good overall connectivity. The urban form of generally wide roads and, in places, existing larger building typology, offers the opportunity to develop sites more intensively for residential and other suitable mixed uses. Proposed developments must carefully consider how the building design will relate to the surrounding urban environment, particularly in relation to suburban streets at the rear. Outside of the strategic locations highlighted in Policy CDH04 'Tall Buildings' residential-led building blocks of up to 7 stories are considered particularly suitable along major thoroughfares, although any 'tunnelling' effect from buildings must be avoided, and separation must be maintained between town centres. Proposals must also consider appropriate ground floor uses in accordance with policies on town centres.

4.26.3 Working towards the Mayor's Healthy Streets Approach of a modal shift away from the private motor vehicle to more sustainable modes such as public transport, cycling and walking, will help to improve the environment along the Borough's thoroughfares. Proposals coming forward along these road corridors must themselves support the Healthy Streets Approach.

4.26.4 Emerging regulatory and technological changes are likely to have a significant impact over the lifetime of the plan. Regulation to reduce emissions from vehicles, combined with a rise in the use of electric vehicles, is likely to lower air pollution and noise levels around Barnet's major roads, leading to a much-improved environment. This in turn will support a better and more intensive use of locations for residential and other uses.

4.26.5 The two key historic routes in Barnet are the Edgware Road A5 corridor following the route of the Roman Watling Street along the valley bottom and the A1000 corridor – the old route of the Great North Road linking the old town centres along the ridge line. Both of these routes have been the focus for continual renewal and intensification over time and include a spread of tall buildings. The Council is preparing a Height Strategy Supplementary Planning Document to guide designs along these road corridors.

4.26.6 Within Barnet there are routes that are managed by Transport for London (TLRN) which could potentially be enhanced, but will require more substantial public transport investment, alongside the healthy streets initiatives, to unlock their capacity for growth. These include:

- A406 North Circular;
- A1 Great North Way/ Watford Way; and
- A41 Edgware Way / Watford Way / Hendon Way.

POLICY GSS11 Major Thoroughfares

Redevelopment along Barnet's main road corridors as set out in the Key Diagram can provide a significant supply of sites for growth. Such locations have capacity to deliver an additional 3,350 new homes. The Council will work with TfL and Highways England to help deliver appropriate sites. Over the Plan period it is likely the environment around Barnet's major thoroughfares will improve due to regulatory changes and new technologies such as electric cars leading to a reduction in air and noise pollution from road vehicles. To achieve the quantum of development sought to be delivered, the Council will expect environmental improvements along and immediately adjacent to the thoroughfares identified.

Development proposals will be supported in these locations where it can be demonstrated that:

- Access to walking and cycling networks will enable safe and active travel;
- Design relates to the context and character of the surrounding area, including suburban streets behind the thoroughfare;
- Achieves a high-quality design that enhances visual amenity and does not contribute to a continuous 'wall like' corridor of medium rise buildings between town centres;
- Contributes to an improved and more active streetscape and facilitates delivery of Healthy Streets Approach;
- Avoids unacceptable levels of air and noise pollution for the new residents;
- Supports and, where appropriate improves, access to open spaces and play spaces, as well as ensuring their continued maintenance; and
- Any proposals to provide car parking should be in accordance with car parking standards.

The A5/ Edgware Road and the A1000 / Great North Road Major Thoroughfares may have potential for residential led tall building development in certain locations optimising site availability and good public transport accessibility, providing the opportunity for revitalising these areas. Further guidance will be provided by the emerging Height Strategy Supplementary Planning Document.

Proposals for tall buildings (8 storeys or more) must be assessed with reference to Policy CDH04.

While specific sites along Major Thoroughfares are identified by the Schedule of Proposals it is expected that further sites will come forward in response to the opportunities for growth.

4.27 Redevelopment of Car Parks

4.27.1 With pressure for ensuring the efficient use of land for housing and other uses there is potential for releasing capacity from surface level car parks within the Borough which are accessible to the public. There is an opportunity to enable surface level car parks to be more efficiently and sustainably utilised while still serving a car parking function. Publically accessible car parks located within or close to town centres and part of a more urban streetscape will be considered suitable for greater levels of intensification.

4.27.2 The Council acknowledges the importance of a convenient and good quality parking supply to ensuring thriving and competitive town centres. Within town centres where there are several car parking locations, enabling greater parking system efficiency can help provide a better level of service for local people, businesses and visitors, and provide some capacity for further demand. In considering local capacity the Council may seek a dedicated development related parking strategy in order to review the existing pricing, timing, availability and management of car parking spaces. This will enable enhanced matching of precise space availability in type and location to existing and anticipated future parking demand and assist in achieving the desirable parking system efficiencies.

4.27.3 Proposals for redevelopment of car parking spaces must be subject to a demonstration that capacity is available, for example due to underuse of existing provision, a more efficient car park design approach such as underground or multi-storey, or a shift of journeys to public transport and active travel modes. Where car parking is maintained at the site vehicle access must be shown to be safe. A clear strategy will be required as part of any proposals for redevelopment of car parking spaces to ensure minimum disruption to parking in the town centre or local area during the redevelopment of the car parking.

POLICY GSS12 Redevelopment of Car Parks

In order to ensure the efficient and sustainable use of land the Council will support re-development of publically accessible surface level car parks for residential and other suitable uses provided that:

- The design preserves the amenity of neighbouring uses;
- Demonstrates how the use of public transport and active modes of travel will lead to reduced car park usage; and
- The parking spaces can be demonstrated as surplus to requirement or re-provided as needed

A transport assessment will be required to ensure a safe pattern of vehicle and pedestrian movement and air quality effects.

In considering local capacity the Council may seek a dedicated development related parking strategy in order to review the existing pricing, timing, availability and management of car parking spaces.

4.28 Strategic Parks and Recreation

4.28.1 Supporting the visitor economy is an important element of the Council's Growth Strategy. This includes both indoor and outdoor destinations that will have a local and or regional reach. Destination locations include the RAF Museum, Allianz Park Stadium, Welsh Harp (Brent Reservoir) and Brent Cross Shopping Centre well as London's only registered battlefield. Barnet has important historical parks and gardens which provide a much valued resource for residents and visitors.

4.28.2 Barnet's Playing Pitch Strategy highlighted the need to create three sports hubs in Barnet to offer a range of activities and opportunities for participation in physical activity and also community activities some of which would be paid for and others which would be free of charge. Further to their support through the Parks and Open Spaces Strategy for wider enhancement of these locations, masterplanning work has been completed and or is being undertaken.

- **Barnet and King George V Playing Fields** is located in the north east of the Borough in close proximity to High Barnet Station and connects with the London Loop and the Dollis Valley Green Walk. The masterplan proposes the delivery of the following facilities to provide a destination for sports and recreation: community football and Gaelic football pitches; hub buildings including changing facilities, café and multi-use community rooms; enhanced amenity space, gardens and play areas; outdoor gym; BMX / skate park; ancillary services and utilities. Through the Upper Dollis Brook and Dollis Valley Green Walk there is potential to significantly improve Barnet's nature conservation and biodiversity with ecological enhancements extending along the Dollis Brook to connect with existing nature reserves and protected conservation areas. Appropriate ancillary facilities may be required to support educational, management and maintenance requirements.
- **Copthall Playing Fields and Sunny Hill Park** is located in the centre of the Borough. This is the Council's most significant sports and recreation site, home to nationally and regionally significant sports organisations. It also has connections to adjacent open spaces (Arrandene Open Space, Mill Hill Park and Mill Hill Old Railway Corridor/Bittacy Hill Park) although suffers from poor public transport. The adopted Copthall masterplan will deliver the following professional and amateur sports facilities: A new Leisure Centre with regional competition pool; community football pitches (both grass and artificial); professional and community cricket pitches and facilities; an improved Allianz Park Stadium alongside amateur rugby pitches facilities; competition standard athletics facilities. These sports facilities will be complemented by recreational facilities that include café; play and other leisure uses that will support wider site management and maintenance; ancillary services and utilities. The existing woodland and nature reserve areas will be complemented with further ecological enhancements and new habitats to protect and improve local biodiversity. Together these improvements will deliver a new district park and regional destination at the heart of the Borough.

- **West Hendon Playing Fields** is located in the south west of the Borough and is closely linked with the Welsh Harp (Brent Reservoir), a Site of Special Scientific Interest (SSSI) which provides the connection between the Silk Stream in the west and Dolls Brook in the east. It is also the key open space connected to and supporting regeneration in West Hendon and around the (The Hyde) A5 Corridor. The masterplan proposes the delivery of facilities that will provide a regional destination for sports and recreation: existing and improved non-motorised water sports; community football pitches (both grass and artificial); bowls; tennis courts; hub buildings including changing facilities, café, leisure and childcare provision and multi-use community rooms; enhanced amenity space, gardens and play areas; outdoor gym; adventure golf; informal and organised adventure sports including BMX, skating, high ropes and climbing provision; and ancillary services and utilities. There will also be walking and cycle routes across the site that will complement and improve accessibility to the existing woodland and conservation areas alongside ecological enhancements and new habitats to protect and improve local biodiversity.

4.28.3 There are wider opportunities for improvements to greenspaces across the Borough delivering outdoor recreational and leisure facilities. These include:

- a) a masterplan for open spaces in the North West Green Belt areas of the Borough;
- b) investments that will enhance heritage destination parks such as Friary Park, Oak Hill Park, Hadley Green and Hendon Park;
- c) improvements that can support the effective management, maintenance and utilisation of parks such as the introduction of UNITAS youth centre at Montrose Park, leisure centres at Victoria Recreation Ground and Glebelands Open Space, as well as new cafés and ancillary facilities across a range of other destination open spaces;
- d) maximising the access to and potential of the key river valleys throughout Barnet namely Dollis Brook, Pymmes Brook and Silk Stream to support leisure, recreation and active travel; and
- e) work as part of the regeneration of Brent Cross (including improvements to Clitterhouse Playing Fields) to make Brent Cross Town the place in London to participate in sport and play.

- 4.28.4 The All London Green Grid Strategy identifies the potential for a Regional Park within the Brent Valley and Barnet Plateau Green Grid Area. Over the lifetime of the Local Plan this will be supported and developed over time through component improvements to individual parks and open spaces; enhancement of footpath, cycling and bridleway networks; improved green corridors and nature conservation areas. A network of new strategic recreational destinations will form the building blocks for this wider regional opportunity, addressing the need for sport, recreation and nature conservation improvements. The open spaces that can most effectively support a new Regional Park and strategic recreational facilities lie within designated Green Belt or Metropolitan Open Land, therefore maximising the long-term benefit of such areas for residents will be the key test for any proposals. Such locations may need accessibility enhancements to unlock their full potential.
- 4.28.5 In terms of indoor recreational provision, the Indoor Sport and Recreation Study together with the Growth Strategy has identified the need for a review of opportunities to improve the visitor economy through new and enhanced facilities in appropriate locations. It is intended that identified opportunities will be considered as recreational destinations under this policy.

POLICY GSS13 Strategic Parks and Recreation

To promote healthy and active lifestyles within Barnet, the Council will provide and promote leisure and recreation facilities that encourage physical activity and assist the mental wellbeing of residents. The need for good access to outdoor recreation space has been highlighted by the COVID19 pandemic. Such facilities may comprise of indoor and outdoor leisure provision, together with ancillary facilities and services.

New indoor facilities should be located within town centres unless they are specifically designed to improve the utilisation of an open space.

The Council will seek to actively improve the quality, quantity and access to open spaces across Barnet through new and improved outdoor sports, leisure and recreational facilities. Such improvements will be delivered alongside nature conservation and biodiversity enhancements.

The Council will promote the creation of a new Regional Park within designated Green Belt or Metropolitan Open Land in the Brent Valley and Barnet Plateau.

5 Chapter 5 – Housing

5.1 National and London Plan Policy Context

5.1.1 Specific National and London Plan Policies to be taken into account:

NPPF

Section 5 Delivering a Sufficient Supply of Homes specifically paras 61 to 76

Planning Policy for Traveller Sites (PPTS)

London Plan

Policy GG4 Delivering the homes Londoners need

Policy D7 Accessible Housing

Policy D13 Agent of Change

Policy H1 Increasing Housing Supply

Policy H2 Small sites

Policy H3 Meanwhile Use as Housing

Policy H4 Delivering Affordable Housing

Policy H5 Threshold Approach to Applications

Policy H6 Affordable Housing Tenure;

Policy H7 Monitoring of Affordable Housing

Policy H8 Loss of Existing Housing and Estate Redevelopment

Policy H9 Ensuring the Best Use of Stock

Policy H10 Housing Size Mix

Policy H11 Build to Rent

Policy H12 Supported and Specialised Accommodation

Policy H13 Specialist Older Persons Housing

Policy H14 Gypsy and Traveller Accommodation

Policy H15 Purpose Built Student Accommodation

Policy H16 Large Scale Purpose Built Shared Living

Mayor of London Housing SPG

Mayor of London Affordable Housing and Viability SPG

5.2 Introduction

- 5.2.1 With Barnet's population continuing to grow, housing demand remains high. This is within a challenging financial environment for a Borough where regeneration and growth need to be delivered in a responsible and sustainable way. To support safe, strong and cohesive communities and improve the quality of housing in Barnet, the Council needs to ensure that a range of choices is available, with a variety of sizes and types of accommodation to meet the aspirations of residents and increase access to affordable, good quality homes. This includes building new homes as well as protecting the existing dwelling stock for those whose needs are changing, such as families seeking larger dwellings, or homes for smaller households including older people who want to downsize and move to housing that can help meet care and support needs. Barnet's demographic profile shows an increasing proportion of younger and older residents, this Plan therefore seeks to understand their needs and ensure that this is reflected in policy.
- 5.2.2 Good housing provision can help to support other Council objectives, such as enabling people with health and social care needs to live independently. As evidenced in the COVID19 national lockdowns of 2020 and 2021 a decent home is a key determinant for good physical and mental health throughout people's lives.
- 5.2.3 Barnet's Housing Strategy highlights that the Council will promote the delivery of homes to meet the needs of older people and those with disabilities, as well as measures to support young people leaving care to make a successful transition to living independently. Access to a good housing environment in childhood is also important for physical and mental development. Barnet's Children and Young People's Plan highlights that within a Family Friendly Barnet, children and young people will be afforded a good standard of living within housing that is safe and affordable.
- 5.2.4 In addition to providing an appropriate dwelling mix the Borough needs to offer greater choice than the standard tenure of residential market units for sale. These housing options may include:
- A range of affordable homes including First Homes delivered on all major schemes (10 or more homes).
 - Build to rent; purpose built housing where it is intended from the outset that 100% of the dwellings will be rented.
 - Supported and specialised housing such as semi-supported accommodation for young people leaving care to provide for particular needs in the community.
 - Specialist older persons housing which helps older and vulnerable persons to live independently as well as making provision for extra care housing.
 - Purpose built student accommodation to support higher education institutions.
 - Purpose built shared living accommodation as an alternative to Houses in Multiple Occupation (HMO).

- Sites for Gypsies, Travellers and Travelling Showpeople in order to meet any need identified by Barnet's Gypsy and Traveller Need Accommodation Assessment (GTNAA).
- Self-build and custom building based on consideration of the Barnet Self-Build Register.
- Managing a balanced housing stock by protecting family houses from conversion into smaller units or HMO.
- Multigenerational homes to enable older and younger persons to live together.
- Entry Level Exception Sites (Starter Homes) as a type of affordable housing product for first time buyers (or equivalent for those wanting to rent their first home).

5.3 **Barnet's Housing Strategy**

5.3.1 The Council's Housing Strategy highlights that costs continue to rise faster than median incomes creating an affordability gap which presents a real challenge for households seeking to buy or rent a home. The demand for homes has resulted in average local house prices increasing from £391,000 in 2014 to £545,000 in 2017, which is 15 times the median household income for Barnet. The Housing Strategy 2019-2024 sets out priorities for meeting the housing challenges facing the Borough. The Strategy focuses on improving standards in the private rented sector, increasing the supply of homes that local people can afford, promoting independent living, tackling homelessness and rough sleeping, and ensuring that homes are safe and secure. The Housing Strategy is further strengthened by the Homelessness and Rough Sleeping Strategy. This Strategy focuses on preventing homelessness, reducing the use of temporary accommodation, and securing new homes for those that are homeless. Establishing effective partnerships, working arrangements, and support for those who are or used to be homeless. The themes of the Housing Strategy, the Homelessness and Rough Sleeping Strategy and the objectives of this Local Plan are underpinned by Barnet's Strategic Housing Market Assessment (SHMA).

5.4 **Affordable Housing**

5.4.1 Home ownership for many people across London remains out of reach and this is no different for many Barnet residents. The increase in house prices along with requirements for sizeable deposits has restricted housing choices for many residents with standard home ownership the most expensive tenure. The delivery of affordable housing has never been more important and in greater demand. This is due to a number of factors including:

- The increasing affordability gap as housing costs continue to rise faster than household incomes.
- The limitations of mortgage availability as lenders have developed a more cautious approach on lending criteria. This has resulted in much lower income multiples being approved for mortgages, the knock-on effect of which is the increased need for larger deposits to secure a mortgage.

- Greater reliance on the private rented sector, making it more challenging for people to save for deposits with high rent costs.
- The housing choices of households on benefits have become more limited as changes to welfare reform make the private rented sector less accessible.
- A reduction in capital funding for housebuilding.
- The cautious approach of investors and housing developers following the economic downturn.
- An increased reliance on the planning system to deliver affordable housing through S106 requirements.

5.4.2 The NPPF defines affordable housing as housing for rent for those whose needs are not met by the market and which comply with one of the following:

- Affordable housing for rent –for homes managed by a Registered Provider where the rent is set at up to 80% of market rent, inclusive of service charges, in accordance with the government’s Policy Statement on Rents for Social Housing, and for Build to Rent affordable rental units that are to be maintained in perpetuity at affordable levels.
- Starter homes - built on commercial or industrial land which is no longer in use and sold at below market levels to young first- time buyers. Full details in Sections 2 and 3 of the Housing and Planning Act 2016. Implementation subject to secondary legislation.
- Discounted market sales housing – sold at least 20% below local market value. Eligibility should be set locally having regard for local incomes and house prices. Provision should be made to ensure that it remains discounted for future eligible purchasers.
- Other affordable routes to home ownership.

5.4.3 There are a range of options available for lower-cost or affordable homes for rent or ownership, including

- Affordable Rent - for households on low incomes, with rent levels that are based on the formula in the government’s Policy Statement on Rents for Social Housing. Rent levels for homes let at a social rent use a capped formula in line with the government’s policy, and London Affordable Rent homes have a benchmark target set by the GLA.
- London Living Rent – for households on average incomes, this offers a lower rent, which enables people to save for a deposit to buy a home. This is an intermediate affordable housing product with low rents set at ward level by the GLA .
- London Shared Ownership - allows London households to purchase a share of a new home and pay low rent for the remaining portion e.g. purchase 25% and rent 75%.This is subject to any other changes on share proportions.
- Other affordable housing products may be offered if they meet the broad definition of Affordable Housing set out in the NPPF and are considered to be genuinely affordable.

- 5.4.4 NPPF (para 63) states that 'provision of affordable housing should not be sought for residential developments that are not major developments'. A major development is defined in the NPPF as 'development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more.'
- 5.4.5 In order to calculate Barnet's affordable housing requirement, the SHMA has considered homeless, concealed and overcrowded households, as well as other households living in unsuitable housing that cannot afford their own home. Newly forming households are also taken into account. From this information the amount and tenure of affordable housing need in Barnet has been calculated.
- 5.4.6 In terms of meeting the objectively assessed need for affordable housing the SHMA states a need to provide as a minimum 23% of the overall objectively assessed need as affordable accommodation. This equates to a minimum of 10,600 new affordable homes by 2036. The delivery of this level of affordable homes should be viewed within the context of a strategic London Plan target of 50% affordable provision for residential proposals on public land, or where agreed with public sector landowners a target of 50% affordable housing across a portfolio of sites where at least 35% affordable housing is provided on each site.
- 5.4.7 National policy requires the Council to set affordable housing targets that are realistic. Particular regard has to be made to development viability. Government does not expect that each major housing application should routinely be subject to viability assessment. Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be undertaken in line with the Mayor's Affordable Housing and Viability SPG.
- 5.4.8 The Local Plan is supported by a Viability Assessment which found that affordable housing requirements can be met across all areas of the Borough but the existing use value of sites is a critical factor in determining the outcome. Where existing use values are high, the ability of residential schemes to meet the policy requirement will be more constrained and the level of achievable residential sales values becomes a more critical factor. In these circumstances, the Viability Assessment concluded that Policy HOU01 contains sufficient flexibility, both in terms of tenure mix and overall quantum, to enable schemes to come forward with a viable package of affordable housing.

- 5.4.9 The London Plan, Policy H4 sets the strategic target of 50% for affordable housing. Through Policy H5, as part of a fast track approach to delivery, the London Plan also introduces the Threshold Approach to Applications with a minimum threshold of 35% (without public subsidy) on all land other than public sector or designated employment land where 50% is the threshold level unless there is a portfolio agreement with the Mayor. London Plan Policy H6 sets out the Mayor's requirements for affordable products. This requires that 30% of new affordable housing should be low cost rental, including Social Rent/ London Affordable Rent; and that a minimum of 30% of affordable housing intermediate including, London Living Rent and London Shared Ownership. In line with London Plan Policy H6 the remaining 40% of affordable homes should be determined by the Borough based on identified need, the tenure split of 60/40 between rented and intermediate products and in accordance with the Housing Strategy.
- 5.4.10 The Council sets out in Policy HOU01 its minimum requirements for affordable housing. Any deviation from the minimum 35% provision that is not consistent with the required tenure mix will need to be fully justified through a policy compliant viability assessment. Where viability impacts are so great that a reduction in the percentage of affordable housing that can be achieved on site is below 35%, the Council will seek to pursue the preferred tenure split of 60/40 between rented and intermediate products as set out in Policy HOU01. This is on the basis that the delivery of more affordable tenures that would meet needs is a greater priority than achieving a potentially higher percentage of affordable housing on site that is not consistent with meeting these priority needs.
- 5.4.11 For all schemes to ensure that a range of affordable homes can be delivered, the basis of calculations for the affordable housing requirement will relate to the number of habitable rooms or the habitable floorspace of the residential development. In schemes where the affordable housing categories involve dwellings with more habitable rooms-per-dwelling than market provision, or different sizes of habitable rooms within different tenures, it is more appropriate for the calculation of the affordable housing proportion to be in terms of habitable floorspace. Applicants should therefore present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison. Minimum residential space standard requirements based on the minimum gross internal floor area (GIA) relative to the number of occupants apply to all new residential development. The Council expects these standards to drive innovation in the design of new homes that respond to housing needs in the Borough.
- 5.4.12 The Government introduced Vacant Building Credit (VBC) in 2014. This applies to sites where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building. VBC reduces the requirement for affordable housing contributions based on the amount of vacant floorspace being brought back into use or redevelopment. In assessing the applicability of VBC the Council will expect all of the following criteria to be met:
- the building is not in use at the time the application is submitted;
 - the building is not covered by an extant or recently expired permission;

- the site is not protected for alternative land use; and the building has not been made vacant for the sole purpose of redevelopment.

5.4.13 As highlighted by Policy GSS10 Estate Renewal and Infill, the renewal and infill of housing estates in Barnet is an important element of the Council's continuing approach to reducing spatial inequalities. The Council is progressing estate renewal across the Borough, successfully regenerating housing estates such as Stonegrove. Such estates will continue to play a significant role in successful place making and new homes delivery. The re-provision of affordable housing is complex and estate regeneration must take account of the specific circumstances of each site, including local infrastructure needs, local housing need in respect of tenure mix, affordability and tenure size, place-making, viability and the nature of the surrounding area. Within the housing estate subject to regeneration the Council will, with existing social rent tenants, facilitate their right of return to the estate into new social rent accommodation. Otherwise the Council will replace existing social rent housing, ensuring no net loss of floorspace, with new affordable accommodation as Affordable Rent.

5.4.14 Affordable housing provision is normally required on-site. In exceptional circumstances off-site provision may be acceptable where it can be robustly demonstrated that affordable housing cannot be delivered on-site or where an off-site contribution would better deliver mixed and inclusive communities than an on-site contribution. Cash in lieu contributions should only be used where there is detailed evidence to demonstrate that on-site affordable housing is not practical, off-site options have been considered and that such a contribution will not be detrimental to the delivery of mixed and inclusive communities.

Policy HOU01 Affordable housing

Within the context of a strategic London Plan target of 50% of all new homes to be affordable the Council will seek a minimum of 35% affordable housing from all developments of 10 or more dwellings.

For all schemes, the basis of calculations for the affordable housing requirement will relate to the number of habitable rooms or the habitable floorspace of the residential development.

Barnet's affordable housing tenure split will expect:

- a) 60% Low Cost Rent products including Affordable Rent;
- b) 40% Intermediate including London Living Rent and London Shared Ownership.

The Council will:

- c) Assess the capacity of sites under the threshold to ensure development is at an optimum capacity;
- d) Expect affordable housing to be delivered on the application site. Off-site provision will only be accepted in exceptional circumstances;
- e) Require an appropriate housing mix in accordance with Policy HOU02.

Innovative housing products that meet the requirements of this Policy will be supported, including approaches that set aside a proportion of homes for critical key workers (as defined by Government¹⁰) on land owned by Government departments and agencies.

On Housing Estates (Policy GSS10) the Council will seek to replace existing affordable housing whilst considering the specific circumstances of each site, it will facilitate the right of return for existing social rent tenants from estates into new social rent accommodation. Otherwise the Council will provide the new affordable accommodation as Affordable Rent

With regards to applications for Vacant Building Credit the Council will expect all of the following criteria to be met:

- the building is not in use at the time the application is submitted;
- the building is not covered by an extant or recently expired permission;
- the site is not protected for alternative land use; and
- the building has not been made vacant for the sole purpose of redevelopment.

5.5 Ensuring a Variety of Sizes of New Homes to meet Housing Need

- 5.5.1 The range of housing sizes and tenures sought in Barnet should reflect the households that live in the Borough and how households are expected to change in the next fifteen years. This means taking into account the size and type of households, affordability and the housing and lifestyle requirements of people with health, social care and support needs.,

- 5.5.2 Barnet's Local Plan (in particular Policy HOU02 and Policy HOU03) seeks to protect the existing stock of houses from inappropriate conversion. It also seeks to address both the demands for family accommodation at lower densities while meeting the pressures for increased densities driven by higher housing targets.
- 5.5.3 The Council will seek to ensure that housing choices are available to address the housing needs of all sectors of the community, making sure that development proposals do not deter shared or multi-generational usage, particularly with an ageing population, to ensure the delivery of truly mixed communities in neighbourhoods for all ages. Innovative design to increase housing choice in addressing housing needs is encouraged by the Council. Developments that can create intergenerational communities provide a basis for mutual support and offer real opportunities to develop new ways to help meet social care and support needs.
- 5.5.4 With high levels of planned housing growth and a changing population a key concern for the Council is that residents are able to secure access to the right accommodation in the right place. It is important that the size and mix of the new homes delivered will reflect the changing demographic and economic make-up of Barnet providing opportunities to increase as well as down-size. In getting it right the Council will consider a range of issues including site size, surrounding context (including town centre location), as well as PTAL and character. Other factors to consider are the proposed mix of uses, the range of housing tenures and any potential for custom-build and community led schemes. Innovative housing products that are in line with Policy HOU02 will normally be supported.
- 5.5.5 According to the Authorities Monitoring Report¹¹ (AMR) one and two bedroom homes remain the dominant type of accommodation delivered in Barnet, accounting for 78% of new homes overall and 86% of flats. In the past a family property would traditionally consist of three bedrooms or more. Many families now live in two bedroom accommodation. Table 9 sets out minimum space requirements for all new self-contained accommodation. Well-designed two bedroom properties of between 70m² and 79m² gross internal floor area¹² can now be considered as family homes as they are capable of accommodating 4 bedspaces. In assessing the size of new homes the AMR will reflect the number of bedspaces as well as homes.
- 5.5.6 Some older residents may wish to downsize, move closer to family or friends or be closer to services and facilities, but they may not want to move into specialist older persons housing. Well- designed new homes in developments in or close to town centres, near to relevant facilities and in areas well-served by public transport may prove attractive to residents wanting to downsize from their existing homes. This helps to free up existing family homes.

- 5.5.7 New one bed homes that meet London Plan space standards contribute to addressing needs in numerical terms; however, they are amongst the least flexible forms of accommodation in allowing for changes to individual housing needs and circumstances over time.
- 5.5.8 Priorities for the Council are to deliver well designed new homes while also protecting the stock of family houses. Providing family homes, with space for growing households, in Barnet will help to encourage such households to remain in the Borough. Delivering (and retaining) homes that are family friendly and capable of providing housing choices for young people and older residents as well as being flexible in addressing the needs of homeworkers¹³ are a mainstay of the Local Plan.
- 5.5.9 In order to protect affordable business space as well as ensure that development produces good quality residential accommodation the Council has introduced Article 4 Directions¹⁴ to better manage permitted development particularly for the conversion of commercial premises to residential. While permitted development continues its association with substandard accommodation the Council will consider further Article 4 directions.
- 5.5.10 The Mayor's Strategic Housing Market Assessment (SHMA) 2017 highlights that one bedrooomed units are the largest requirement for market as well as social rented housing in London. This contrasts with the findings of Barnet's SHMA published in 2018. On the basis of evidence on recent household formation, in-migration, out-migration and projected household dissolution the Barnet SHMA has identified housing mix requirements by dwelling size and tenure type over the next five years for the Borough. The dwelling size priorities will guide the mix of housing sought across Barnet and provide a basis for determining the mix of homes on individual sites. These priorities will be subject to periodic review and update when new assessments of housing need are commissioned.

Table 6 - Full Objectively Assessed Need for Housing Size by Tenure¹⁵

Unit Size	Market Housing
1 bedroom	6%
2 bedrooms	24%
3 bedrooms	40%
4 bedrooms	25%
5+ bedrooms	5%
Total Market Housing	100%
	Affordable Housing
1 bedroom	13%
2 bedrooms	43%
3 bedrooms	27%
4 bedrooms	13%
5+ bedrooms	4%
Total Affordable Housing	100%

5.5.11 Table 6 shows a particular need for 2, 3 and 4 bedroom properties across all tenures. There is a significant need for family sized housing to be provided as part of any market housing mix. Around 70 per cent of the need for affordable homes in Barnet is for 2 and 3 bedroom properties. This is slightly more than for same sized market homes. Barnet's SHMA highlighted that the smallest element of need across market and affordable housing was for houses with 5 bedrooms or more. Table 7 provides a further tenure breakdown by size. This covers low cost rent (households who cannot afford London Living Rent) and intermediate housing (London Living Rent and Affordable Rent) as components of affordable housing. Households that can afford Affordable Rent are also more able to access Low Cost Home Ownership products such as shared ownership.

Table 7 – Objectively Assessed Need for Affordable Housing Tenure by Size¹⁶

Unit Size	Low Cost Rent	Intermediate	
	Cannot afford London Living Rent	Can afford London living rent / Cannot afford Affordable Rent	Can afford Affordable Rent / Low Cost Home Ownership
	%	%	%
1 bedroom	15	1	15
2 bedrooms	43	33	53
3 bedrooms	27	39	23
4 bedrooms	12	21	7
5+ bedrooms	3	6	2
Total	100	100	100

Policy HOU02 Housing Mix

In order to deliver safe, strong and cohesive neighbourhoods development should provide a mix of dwelling types and sizes in order to create sufficient choice for a growing and diverse population across all households in the Borough.

In protecting existing housing stock across Barnet the Council will manage the conversion of residential dwellings through Policy HOU03.

Barnet dwelling size priorities are:

- a) For market homes for sale and rent – 3 bedroom (4 to 6 bedspaces) properties are the highest priority, homes with 2 (3 to 4 bedspaces) or 4 bedrooms (5 to 8 bedspaces) are a medium priority.
- b) For Affordable Homes (see Policy HOU01 and supporting text):
 - i. the smallest 2 bedroom property in this tenure is required to provide a minimum of 4 bed spaces in accordance with the residential space standards in Table 9
 - ii. 2 and 3 bedroom properties are the highest priority for homes at Low Cost Rent.
 - iii. 3 bedroom properties are the highest priority for homes at a London Living Rent.
 - iv. 2 bedroom properties are the highest priority for homes at an Affordable Rent / Low Cost Home Ownership.

These dwelling size priorities will be subject to periodic review and update when new assessments of housing need are commissioned.

Through the Authorities Monitoring Report (AMR) the Council will set out progress on delivering these priorities and building the right homes for the next generation. The AMR will inform the Council's consideration of dwelling mix on a site by site basis.

In applying the preferred housing mix the Council will consider the following criteria:

- c) Site size, surrounding context (including town centre location), PTAL and character.
- d) Mix of uses.
- e) Range of tenures.
- f) Potential for custom-build and community led schemes.

Innovative housing products that meet the requirements of this Policy will be supported.

5.6 Residential Conversions and Redevelopment of Larger Homes

- 5.6.1 The Council's Growth Strategy highlights that in delivering new homes for the growing population greater emphasis will be placed on locations with good public transport accessibility such as town centres. Sustainable housing growth will contribute to thriving town centres. However, the loss of existing family size housing can be difficult to offset through the provision of newbuild family accommodation in new housing developments which will be predominantly located in town centres.
- 5.6.2 While the Council acknowledges the contribution of flats from the conversion of larger residential properties in terms of boosting the Borough's housing supply, it also has to balance this with concerns from existing residents that a concentration of such flats can have a detrimental impact on the character and amenity of a neighbourhood as well as the loss of family accommodation from the dwelling stock. The loss of larger homes through demolition and redevelopment is of particular concern.
- 5.6.3 As part of the Local Plan evidence base the Council has assessed the impact of residential conversions, defined as a form of development that involves the replacement, extension or conversion of existing buildings¹⁷. This includes redevelopment of larger homes. The conversion of existing dwellings into flats or Houses in Multiple Occupation (HMO) can have a cumulative effect of added pressure on off-street car parking and local services. Residential conversions may be appropriate in certain types of property or street, particularly where they are highly accessible; however, even in such locations they can harm the character of areas by changing external appearance and increasing activity. Such activity can often involve more noise, waste, overcrowding, people movements and increased vehicular movements.
- 5.6.4 In order to manage the existing stock of homes the Council seeks to restrict the conversion of family accommodation into smaller self-contained dwellings. On the basis of the Residential Conversion Study a threshold of 130m² gross original internal floor area has been set as the smallest floorspace allowance that could successfully incorporate two self-contained units respectively. In order to mitigate the further erosion of family accommodation Policy HOU03 requires that a family sized home (of at least 74m² gross internal floor area providing 3 bedrooms)¹⁸ is included within any proposed conversion to self-contained flats. This family sized home should be on the ground floor and have access to a rear garden.
- 5.6.5 Where conversions are deemed acceptable any external alterations should seek to minimise their impact on the external appearance of the property and local character. Conversions must deliver London Plan residential space standards and also be able to satisfactorily address all other relevant policies in the Local Plan including the need to consider the dwelling size priorities set out in Policy HOU02 and the approach to parking management set out in Policy TRC03. Further guidance on conversions is set out in the Residential Design Guidance SPD.

- 5.6.6 Converted residential properties are generally more intensely used and therefore are more appropriate in areas with good public transport accessibility and access to local services. Areas around Barnet's Town Centres and places with a PTAL score of 5 or more are the preferred locations where conversions are considered appropriate. These locations are areas where roads are not largely characterised by larger homes and where conversions will contribute to an increase in the mix and type of dwellings available without being detrimental to local character and amenity.
- 5.6.7 Areas outside of these preferred locations are considered more appropriate for families and allow for the provision of larger homes. Increasing the provision of larger homes in accordance with Policy HOU02, whilst continuing to resist the loss of existing larger homes should help ensure that the dwelling stock remains balanced in Barnet and capable of providing housing choice.

Policy HOU03 Residential Conversions and Re-development of Larger Homes

To effectively manage housing growth and ensure that residential conversions do not have a detrimental impact on the character and amenity of local areas, the Council will permit the conversion of larger homes into smaller self-contained residential units (C3) where all of the following apply :

- a) It is located within 400 metres walking distance of a major or district town centre (in accordance with Policy TOW01) or it is located in an area with a PTAL of 5 or more.
- b) The conversion provides at least one larger family sized home of 74 m² or more (gross internal floor area) and capable of providing 3 bedrooms on the ground floor with access to a dedicated rear garden of the converted home.
- c) The original gross internal floor area of the property exceeds 130m² where 2 self-contained residential units or more are proposed.
- d) The property is not in a road that is largely characterised by large houses and that no significant loss of character or amenity occurs to the area as a result of increased traffic, noise and/or general disturbance.
- e) A good standard of living conditions and amenity for future occupiers in terms of privacy, daylight and outlook is provided.
- f) Minimum car and cycle parking provision in accordance with Policy TRC03.
- g) Proposals meet London Plan residential space standards (Policy D6) and the criteria set out in Policy CDH01 – Promoting High Quality Design.

The Council will apply these criteria to any proposals for the demolition and redevelopment of larger homes.

5.7 Specialist Housing

5.8 Housing choice for older people

5.8.1 Older people in Barnet are more likely to be owner occupiers without a mortgage and more likely to under occupy their properties. Households comprising older people are sometimes asset rich but cash poor, and can struggle to maintain their homes. National research¹⁹ reveals that living in well located housing close to local services and amenities makes an important contribution to older people's health and wellbeing. The majority of older people prefer to either remain living in their home, or in accommodation that is part of the ordinary housing stock but better designed to meet their needs as well as located closer to public transport.

5.8.2 Chapter 2 highlights that the number of older residents in Barnet is set to increase. It is therefore necessary to ensure suitable housing choices are available in order to meet their aspirations. Older people are living longer, healthier lives, and the specialist housing offered today may not be sufficient in future years. Care is underpinned by the principle of sustaining people at home for as long as possible. Therefore, despite the ageing population, current policy recognises that the number of care homes may decline, as people are supported to continue living in their own homes for longer. This is reflected in Barnet's Housing Strategy which aims to make it easier for older residents to plan for the future and ensure that they have choices when their own home no longer meets their needs. A growing need is being identified for care homes that are able to provide complex care for conditions such as dementia and nursing services.

5.9 Housing choice for people with disabilities

5.9.1 Good housing can help to support other Council objectives, such as helping older people with support needs to live independently. The Council promotes the delivery of homes that meet the needs of older people and those with disabilities, as well as measures to support young people leaving care to make a successful transition to living independently.

5.9.2 All new homes in the Borough are required to be accessible and adaptable, complying with M4 (2) of the Building Regulations 2015. The Council also requires 10% of homes to meet Building Regulation M4 (3) standards for wheelchair user dwellings to ensure that accessible homes continue to be built in the Borough.

5.10 Housing choice for vulnerable people

5.10.1 The Council retains a responsibility for young people (of up to 25 years) with special educational needs and disabilities. As more young people with complex needs approach adulthood, there is a need to help them live as independently as possible within the community. Accommodation based support including the right assistive technology together with good quality, well designed group or clustered housing is the approach the Council will take to address this need. This may be a mix of new housing but the Council is also considering opportunities for re-design of existing supported housing provision.

5.10.2 Housing proposals for vulnerable people should consider the following types of accommodation:

- Extra care housing.
- Sheltered plus housing.
- Residential care homes.

5.10.3 The Council has identified a need for additional supported housing for vulnerable people and is increasing the supply of extra care housing as an alternative to residential care homes, providing a more flexible and affordable approach that can help older people live more independent lives for longer. Older people who are frail and living with dementia could be cared for appropriately in this type of scheme or in specialist nursing homes where appropriate. The Council are considering the potential of the existing care homes stock and whether this can be enhanced to meet the nursing needs of the most frail. Therefore, conversion of any residential care to general needs or other housing should be carefully considered and consulted on with the Council.

5.10.4 Proposals for such accommodation are expected to clearly demonstrate need and how they are contributing to the delivery of Council strategies and priorities. Loss of extra care housing will not normally be acceptable and compliance with Policy CHW01 will be required where community facilities may be lost.

5.10.5 Any new extra care housing and care homes for older people should be within reasonable walking distance, defined as 400m, from a local parade of shops/ local centre or town centre. Providing communal space on site, both for visitors and staff, supports the provision of high quality care for older people, facilitating visits from friends and family that they value highly. Ensuring adequate facilities for staff will help support them in providing a service. Schemes that can act as community hubs will be of particular interest.

5.10.6 The modelling of older people's specialist housing need is complex, which can lead to differing outputs. Bed spaces in residential institutions (Use Class C2) are not currently counted as part of the housing supply. Barnet's SHMA identifies the future need for older persons housing broken down by tenure and type, as outlined in Table 8 (e.g. sheltered, enhanced sheltered, extra care and, registered care).

Table 8 - Additional modelled demand for Older Persons Housing up to 2036²⁰

Tenure		%
Traditional Sheltered		23
Extra Care	Owned	12
	Rented	6
Sheltered plus or Enhanced Sheltered	Owned	4
	Rented	4
Dementia		3
Leasehold Schemes for the Elderly		48
Total		100

5.10.7 The London Plan provides annual benchmarks for the delivery of specialist older persons housing. Barnet has been set an indicative benchmark of 275 units per annum for C3 housing, which is the highest of all the London boroughs. The London Plan highlights the increasing need for accommodation suitable for people with dementia and that in delivering specialist older persons housing the Council should have regard to local housing needs information including data on the local type and tenure of demand, and the indicative benchmarks. Sites for such housing need to be well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport.

5.11 Residential Care Homes

5.11.1 The Council's strategy is to make it easier for residents to plan ahead as they approach old age, and to ensure that those with higher care needs have a non-residential care choice when their own home no longer meets their needs. Extra care housing is seen as a viable alternative in many cases to residential care, allowing residents more independence whilst encouraging community and activities. As set out in the Housing Strategy the Council has identified a need for additional supported housing and is increasing the supply of extra care housing as an alternative to residential care homes, providing a more flexible and affordable approach that can help older people live more independent lives for longer.

- 5.11.2 The Joint Strategic Needs Assessment shows that while the Council has been highly successful in reducing the rate of admission to residential care, the numbers of people living in this type of accommodation remains relatively high within Barnet's local authority comparator group. This is due to the high number of care homes places within the Borough purchased by the NHS, other local authorities and people funding their care privately, many of whom will come from other areas. The Council makes relatively few placements into care homes, with less than 30% of care home places within the Borough purchased by the Council, and some of the lowest rates of admission nationally for both older people and working age adults.
- 5.11.3 Places for people who do not require specialist nursing or dementia care are known as 'mainstream places'. The care home market in Barnet currently consists of 64 registered residential homes and 18 registered nursing homes. Together they provide capacity for over 3,000 people, with the majority of places designed for older people. The current supply of mainstream residential places in Barnet exceeds placements made by the Council. The oversupply of mainstream places is a national issue. The effect of this additional mainstream supply is to increase the potential of cross border purchasing from outside Barnet. This places a greater burden on the Council and local healthcare services.
- 5.11.4 While Barnet has an oversupply of residential care homes, there is an undersupply of homes which support people with complex and nursing needs. This has become more acute in recent years following the departure from the local market of a number of large services, resulting in over 300 fewer nursing places available locally.
- 5.11.5 The Council has concerns about 'mainstream' overprovision and the associated costs for non-local need. It therefore supports the remodelling of such facilities as other forms of provision for older people including 24 hour support for people with more complex needs and higher levels of dependency as well as extra care. Care homes which are redeveloped will be encouraged to provide a spectrum of services, such as co-locating extra care housing with high dependency nursing care.
- 5.11.6 Overall, the numbers of people with impairment and deficiency will increase over the next 20 years. The policy directives for the NHS to 'shift care closer to home' is aimed to provide more choice and flexibility in how health care needs are met. These changes will place significant pressures on social care systems as more people are treated in the community. In order to help residents live healthy and independent lives the Council provides a range of home and community support services. More than 70 per cent of people with a care package receive some sort of community service (including direct payments, outreach and homecare elements of supported living and extra care).

5.12 Houses in Multiple Occupation (HMO)

- 5.12.1 Houses in Multiple Occupation (HMOs) are properties occupied by unrelated individuals who share basic amenities such as a kitchen or bathroom. The traditional source of HMOs tends to be larger, older single family dwelling houses, located in areas with good access to public transport (in particular bus routes) and local services as well as large single dwelling houses that can be sub-divided into much smaller and more affordable accommodation. Concentrations of HMOs in such locations are often associated with poor standards of accommodation, loss of local character, reduction in environmental quality, increased noise complaints, increased levels of crime and anti-social behaviour, loss of family houses, increased pressures on car parking and local services as well as impact on local retail offer.
- 5.12.2 To better manage these impacts (in particular the supply of HMOs across Barnet), the Council confirmed an Article 4 Direction in 2016 to withdraw permitted development rights for the change of use from dwelling houses (Use Class C3) to small-scale HMO (Use Class C4). Any proposal in Barnet to convert a dwelling to a small or large HMO requires planning permission following confirmation of the Article 4 Direction. Planning use classes are set out in the Town and Country Planning (Use Classes) Order 1987 (as amended). Provisions relating to licensing (including HMOs) are set out in the Housing Act 2004 and related secondary legislation. In accordance with the 2004 Act the Council has agreed minimum standards for HMOs and other homes with shared facilities. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers.
- 5.12.3 As part of its approach for managing HMOs the Council in 2016 introduced an Additional Licensing Scheme. This means that the majority of privately rented properties occupied by persons who do not form a single household now require an HMO licence. Licences require the relevant persons to be “Fit and Proper” and impose conditions linked to maintaining minimum standards and ensuring that accommodation is appropriately managed. To ensure that landlords are fully aware of their responsibilities the Council encourages them to acquire formal accreditation through the London Landlord Accreditation Scheme (LLAS).
- 5.12.4 The Council determines HMO Licences in order to protect the health, safety and welfare of the occupying tenants of such residential premises. HMO Licence holders are advised that where planning consent is required for HMO use, they will be responsible for obtaining the necessary permission and that the property licence and conditions do not imply or grant by inference or otherwise, any approval or permission for any other purpose including for planning purposes under the relevant Acts. Where planning issues are identified as part of the HMO Licencing process, the Planning Enforcement Team will investigate the matter and take the appropriate action.

5.12.5 HMOs are an important source of low cost, private sector housing for students, those on low incomes and those seeking temporary accommodation. Many people living in this type of housing will only be able to afford shared accommodation (either with or without housing benefit support). For this reason the conversion of HMO dwellings to self-contained flats will be resisted as this impacts the choice and affordability of housing in the Borough. Applicants for such conversions will be expected to demonstrate the absence of need for this type of accommodation.

5.12.6 An important consideration for determining HMO applications is whether proposals could reduce mix, inclusivity and sustainability of a neighbourhood, for example whether additions to an existing concentration of HMOs could skew the population towards particular groups or lifestyles. The potential harm to nearby residential amenity is also an important consideration, for example from residents congregating in outside areas close to other homes. Where appropriate the Council will seek a planning obligation to protect amenity through an HMO management plan.

5.13 Student Accommodation

5.13.1 London's higher education institutions make a significant contribution to the economy and labour market. Town centres with good public transport connections are considered more appropriate for student accommodation. Developers intending to build new student housing should demonstrate need that links with London's higher educational institutions, in particular local and Central London establishments that are easily accessible by public transport, cycling or walking. This should be secured through a nomination agreement.

5.13.2 Student housing is often associated with a concentration of relatively short term residents who, by reason of their particular social needs and the nature of activity associated with student life create a demand for facilities and services that can have unintended impacts on established communities. However, there is recognition that new, purpose-built student accommodation that is well planned and managed may benefit a community by alleviating local pressures for Houses of Multiple Occupation (HMO's).

5.13.3 Barnet's higher education establishments are located predominantly in the west of the Borough. The Council is working with Middlesex University at the Hendon campus in order to assess the potential of the Council's and University's land-holdings and allow for the regeneration and optimisation of the estate, including increased provision of suitable accommodation to meet the needs of students, ensuring that development contributes to a mixed and balanced neighbourhood. This joint work and the planning approach to be taken forward through The Burroughs and Middlesex University Supplementary Planning Document.

5.13.4 Within Hendon and neighbouring wards there has been a concentration of planning applications for new HMO, placing additional strain on the availability of family housing on the area. In order to ensure positive partnership and cooperation between Middlesex University and the established community the Council encourages the formation of community liaison groups. Such groups can provide the University and all residents with a forum to share information and address concerns about the University campus and activities associated with it.

5.13.5 In considering any proposals for new student accommodation a Student Management Plan will be required to ensure that student needs are addressed, the quality of the surrounding environment is maintained to a high standard and that any negative impacts on the established community are mitigated. The Student Management Plan should act as a code of conduct that the provider will abide by in managing the student housing, and include detailed commitments in relation to the following:

- health and safety standards and procedures;
- security and crime prevention measures and procedures
- maintenance and repairs;
- environmental quality;
- landlord and tenant relationship;
- student welfare;
- advice on access to health care, including first aid and mental health first aid;
- advice on availability of prayer rooms and access to places of worship for different faiths and denominations;
- move in/out strategy for arriving/departing students;
- management of anti-social behaviour and disciplinary procedures;
- arrangements for liaison with occupiers of nearby properties and the wider local community should any disturbance arise from the operation of the student housing; and
- administration and compliance procedures.

5.13.6 All student housing should be accredited under one of the following codes:

- The Universities UK/GuildHE Code of Practice for University Managed Student Accommodation
- The ANUK/Unipol Code of Standards for Larger Residential Developments for Student Accommodation Managed and Controlled by Educational Establishments
- The ANUK/Unipol Code of Standards for Larger Developments for Student Accommodation NOT Managed and Controlled by Educational Establishments

- 5.13.7 Where an alternative use of the student housing is proposed outside term time, the applicant should also submit a draft Non-student Management Plan to mitigate any potential impacts of the non-student use on other occupiers of the development, neighbours and the surrounding area. This should include similar provisions to the Student Management Plan insofar as the provisions are also relevant to the nonstudent use.
- 5.13.8 The London Plan highlights that net non-self-contained accommodation for students and shared living schemes should count towards meeting housing targets on the basis of a 3:1 ratio, with three bedrooms being counted as a single home. Previously one bedroom space equalled one housing unit. Although the proportionate contribution to meeting housing targets will be reduced, such accommodation still has an important role to play in widening housing choice and addressing need.
- 5.13.9 Unlike other low-income households, students are not eligible for welfare payments (such as housing benefit) and would not be allocated affordable housing; therefore, student households are also excluded from the assessment of affordable housing need. The Council will seek to secure through S106 contributions student housing at rent levels which are affordable to the wider student body. London Plan Policy H17 requires at least 35% of bedrooms delivered to be secured as affordable student accommodation, which is defined through the Mayor's Academic Forum.

5.14 Purpose Built Shared Living Accommodation

- 5.14.1 Barnet's SHMA highlights that the number of multi-adult households living in the Borough increased by 25% between 2001 and 2011. Whilst this includes HMOs it also includes single people living together as a group and defined as a single household, and individuals with lodgers. Many people living in this type of housing will only be able to afford shared accommodation. The growth of shared households increases pressure on the existing dwelling stock, in particular family homes.
- 5.14.2 Proposals for large-scale purpose-built shared living developments are more likely to come forward as an alternative to sharing a flat or house. Such developments in planning terms are Sui Generis non self-contained market housing. The Council will only support such proposals when it is demonstrated that they meet an identified housing need and it contributes to a safe, strong and cohesive neighbourhood, with no harmful impact on the character and amenities of the surrounding area.
- 5.14.3 A Management Plan must be produced and submitted with the planning application showing how the whole development will be managed and maintained to ensure the continued quality of the accommodation, communal facilities and services, and that it will positively integrate into the surrounding communities. The agreed Management Plan should be secured through a Section 106 agreement. Any such proposal will be assessed in accordance with London Plan Policy H18 Large-scale purpose-built shared living.

Policy HOU04: Specialist Housing – Housing choice for people with social care and health support needs, Houses in Multiple Occupation, Student Accommodation and Purpose Built Shared Living Accommodation

1: Housing Choice for People with social care and health support needs

Proposals for people with social care and health support needs should :

- (a) In meeting an identified need help people to live independently;
- (b) Deliver older persons housing as guided by the London Plan indicative benchmark of 275 new specialist older persons homes per annum and the tenure priorities set out in Table 8;
- (c) Demonstrate that they will not have a harmful impact on the character and amenities of the surrounding area;
- (d) Be within 400m walking distance of local shops and easily accessible by public transport;
- (e) Provide adequate communal facilities including accommodation for essential staff on site;
- (f) Deliver affordable and accessible accommodation in accordance with London Plan policies H4, H5 and D7 Support the remodelling of residential care homes to other forms of special accommodation in order to widen housing choice, support healthy and independent lives and to reduce over supply; and
- (g) ensure that vulnerable residents benefit from housing choice and that additional residential care home provision is only supported when evidence of local need can be demonstrated

2. Houses in Multiple Occupation (HMO)

Proposals for new HMOs must:

- (a) Demonstrate that they meet the requirements of the Additional Licensing Scheme and complies with any relevant standards for Houses in Multiple Occupation;
- (b) Meet an identified need and demonstrate that they do not create a harmful concentration of such a use in the local area;
- (c) Demonstrate that they will not have a harmful impact on the character and amenities of the surrounding area; and
- (d) Be easily accessible by public transport, cycling and walking

3: Student Accommodation

Proposals for purpose-built and accredited student accommodation should demonstrate that:

- (a) they meet an identified local or strategic need from higher educational establishments (as defined by London Plan Policy H15) within Barnet or Central London that are easily accessible by public transport, cycling or walking;
- (b) they are located within an area, including town centres and main thoroughfares, that are also accessible by public transport, cycling and walking;
- (c) the use of accommodation is secured for students of one or more specified higher education institutions through a nomination

4: Purpose Built Shared Living Accommodation

Any proposals for large-scale shared living accommodation will be expected to demonstrate how they are meeting an identified housing need and contribute to safe, strong and cohesive neighbourhoods. Proposals will be expected to meet all criteria in London Plan Policy H18 Large-scale purpose-

5.15 Efficient Use of Barnet's Housing Stock

5.15.1 Barnet is expected to deliver a minimum of 35,460 new homes within the lifetime of the Local Plan. This is one of the most challenging housing targets in London. Ensuring the efficient use of the housing stock, delivering new homes as well as protecting existing ones, is an appropriate approach to meeting this need.

5.15.2 It is recognised that there may be specific limited circumstances where the loss of residential uses may be acceptable subject to consideration of how it will be replaced. Changes of use may be permitted where a clear local need can be demonstrated to provide health facilities, a children's nursery or educational use. The Council strongly supports the provision of community uses within Barnet's town centres. This is reflected throughout this Local Plan, particularly within Policies CHW01, TOW01 and TOW02. Therefore, any proposal that involves the replacement of residential units with community uses should be of a small scale and will be considered on its merits having regard to the impact on the amenity of residents, car parking and traffic. In considering such proposals the Council will seek opportunities through appropriate design solutions to re-provide or increase on-site residential floorspace.

5.15.3 Long term vacant dwellings (over 6 months) can compromise the supply of homes for people to live in as well as erode community cohesion. The Council investigates why homes are vacant and seeks where possible to bring them back into use. In cases where the owner will not work with the Council the appropriate enforcement action will be taken ranging from service of minor work notices to compulsory purchase.

5.15.4 Ensuring that homes are lived in and meeting the Borough's growing housing needs is becoming an increasing problem with the use of dwellings as short-term holiday rentals. Within London, under the terms of the 2015 Deregulation Act, a residential property may only be used as temporary sleeping accommodation (short-term letting) if two conditions are met. These are that the total number of nights that a property is used as a short-term let must not add up to more than 90 nights in a calendar year, without obtaining planning permission. Also at least one of the persons providing the accommodation must be liable to pay Council Tax at the property where the short-term accommodation is provided. Such rentals can cause a significant impact when they are concentrated in specific parts of the Borough. Where infringements can be proven the Council will take appropriate enforcement action against property owners.

5.15.5 The Council will work with developers and landowners to identify appropriate sites for meanwhile uses. These meanwhile uses can include temporary housing on land that is awaiting longer term development. Temporary housing can be provided in precision manufactured homes which are capable of being delivered and removed quickly as well as reused on other sites. Such temporary accommodation should not have an unacceptable impact on residential amenity or prevent sites from being redeveloped in a timely fashion. The quality of such homes must meet the policy requirements of the Local Plan.

Policy HOU05 Efficient Use of Barnet's Housing Stock

The Council will ensure the efficient use of Barnet's housing stock in addressing identified housing needs.

1. Loss of residential accommodation will not be permitted unless:
 - a) The proposed use is for a local community facility (children's nursery, educational or health use) where a local need can be clearly demonstrated and demand for the local community facility cannot be met within the Council's preferred locations for such uses (see Policy CHW01) and is not detrimental to residential amenity; or
 - b) The location is no longer viable for residential use; or
 - c) The location involves Estate Renewal and Infill with demolition of housing and estates (see Policy GSS10) which provides for the net replacement of the total residential units; or
 - d) The location is within a Growth Area, Town Centre or Local Centre which provides for the net replacement of the total residential units.
2. The Council will utilise its regulatory powers to reduce the number of vacant dwellings and bring them back into use.
3. The Council will protect housing from permanent conversion to short-stay accommodation.

4. Opportunities for the temporary (meanwhile) use of vacant buildings or land awaiting longer term development for a socially beneficial purpose, are encouraged.

5.16 Meeting other Housing Needs

5.17 Build to Rent

5.17.1 The Local Plan takes a positive approach to Build to Rent as a product that helps to widen housing choice in Barnet. In considering this form of housing the Council's approach will reflect Barnet's distinctive economic position based on rent rather than sales. Build to Rent schemes tend to require a minimum amount of dwellings (of over 50 units) to be attractive to institutional investors.

5.17.2 As part of the Council's plans for Brent Cross delivery of a Build to Rent scheme is supported (see Policy GSS02). Opportunities for Build to Rent, on specific sites with large capacities, have been identified in the Schedule of Proposals (Annex 1) Build to Rent has been highlighted as an appropriate use in its contribution to faster build out rates as well as widening housing choice. The Council will require contributions from Build to Rent proposals to affordable housing in accordance with London Plan Policy H11. This should be in the form of Discounted Market Rent units delivered at a genuinely affordable rent level. Such provision of affordable housing should be in perpetuity.

5.18 Self-Build and Custom Build

5.18.1 The Self Build and Custom Housebuilding Act 2015 widened the ability for people to build or commission their own home. The supply of self and custom build plots is typically very small scale, usually infill between existing dwellings, or in rear gardens. Barnet has a responsibility to allow for the needs of people who want to build their own homes; therefore, persons wanting to either self-build or custom-build their homes will be supported where it accords with the policies in this Local Plan. Since April 2016 the Council has maintained a Self-Build Register to account for those wishing to build their own home.

5.18.2 The 2015 Act requires the Council to have regard to demand for Self Build when undertaking planning functions. Entrants on the Register²¹ represent an exceptionally small proportion of Barnet's objectively assessed housing need. The Council has therefore not allocated any specific sites in the Schedule of Proposals for self-build and custom housebuilding. The Council will keep this under review. The Council will support Neighbourhood Plans that consider identifying appropriate sites for self-build or custom-build.

Policy HOU06 Meeting Other Housing Needs

In ensuring that there are the right homes to address housing needs the Council will:

Build to Rent

- a In consideration of Build to Rent schemes as an alternative to traditional built for sale the Council will apply the following criteria:
- i Ensure through imposition of a covenant that homes remain as Build to Rent for a minimum of 15 years post construction;
 - ii All units are self-contained and let separately; and
 - iii There is unified ownership and unified management of the Build to Rent scheme.
- b Requirements for affordable housing will be considered against London Plan Policy H13 Build to Rent.

Self-Build and Custom Housebuilding

- c Neighbourhood Plans will be encouraged to identify opportunities for Self -Build and Custom Housebuilding.

5.19 Gypsies, Travellers and Travelling Showpeople

- 5.19.1 The West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) provides a robust and objective assessment of current and future need for accommodation. The GTAA identified no current or future need in Barnet for pitches and plots for Gypsy and Traveller households as well as Travelling Showpeople. The Council acknowledges that insufficient pitch provision can contribute to a rise in unauthorised encampments, with implications for the health and wellbeing of Gypsies, Travellers and Travelling Showpeople, community cohesion and costs for boroughs. As part of the evidence base the Council has a record of unauthorised encampments and will continue to monitor such incidents. Although on the basis of this rigorous assessment and monitoring of unauthorised encampments there is no known need for accommodation in Barnet, the Government's Planning Policy for Traveller Sites (PPTS) suggests the use of a criteria based policy for any unknown households that do provide evidence that they meet the PPTS planning definition. This enables the Council to actively plan for Gypsy and Travellers' accommodation needs, ensuring that new sites are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood. The Council will work with the Mayor on a London-wide Gypsy and Traveller accommodation needs assessment.

Policy HOU 07 Gypsies, Travellers and Travelling Showpeople

The Council can demonstrate that there is no objectively assessed need for pitches and plots for Gypsies and Travellers and Travelling Showpeople households.

Any proposals for such accommodation that do come forward will be considered on the basis of ensuring:

- a) Close proximity to a main road and safe access to the site with adequate space on site to allow for the manoeuvring of vehicles.
- b) Reasonable access to local shops and other community facilities, in particular schools and health care.
- c) Scale of the site is in keeping with local context and character.
- d) Appropriate landscaping and planting to address impact on amenity and enable integration of the site with the surrounding environment.
- e) Any use on the site does not have any unacceptable adverse impacts on neighbouring residents.
- f) Appropriate facilities must be provided on-site, including water and waste disposal.
- g) That flood risk and the impacts of climate change are taken into account when assessing the suitability of sites to ensure that residents on these sites are not highly vulnerable to flooding.

6 Chapter 6 - Character, Design and Heritage

6.1 National and Local Plan Policy Context

6.1.1 Specific National and London Plan Policies to be taken into account:

NPPF

Section 12 Achieving Well Designed Places specifically paras 125 to 132.

Section 16 Conserving and enhancing the historic environment specifically paras 189 to 202

London Plan

Policy GG3 Creating a healthy city

Policy D1 London's form and character and capacity for growth

Policy D2 Infrastructure requirements for sustainable densities

Policy D3 Optimising site capacity through design-led approach

Policy D4 Delivering good design

Policy D5 Inclusive design

Policy D6 Housing quality and standards

Policy D7 Accessible housing

Policy D6 Optimising housing density

Policy D8 Public realm

Policy D9 Tall buildings

Policy D10 Basement development

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire safety

Policy D13 Agent of Change

Policy HC1 Heritage Conservation and Growth

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy SI2 Minimising greenhouse gas emissions

Policy SI3 Energy infrastructure

Policy SI7 Reducing waste and supporting the circular economy

Mayor of London - Accessible London: Achieving an inclusive environment SPG

Mayor of London - Character and Context SPG

6.2 Introduction

6.2.1 Delivering well designed safe, sustainable homes and places where people choose to work, rest and stay has never been as important and the emphasis on design to building back better has never been as great. This is reflected in the work of the Building Better Building Beautiful Commission and the radical reforms to the English planning system as proposed in the imaginatively titled White Paper – Planning for the Future, published in August 2020.

6.2.2 As Barnet recovers from COVID19 and the Borough's opportunities for growth are further realised the character of this suburban London borough will inevitably change. An important role for the Local Plan and the suite of SPDs and accompanying design codes that help underpin it, is managing that change and retaining the qualities that attract people to live in Barnet and make it the most family friendly place in London. To create the safe, sustainable and successful places an appropriate balance must be struck which involves new development responding to its context in terms of existing character, appearance and scale.

6.3 **Barnet's Character**

- 6.3.1 Integral to the Council's ambitions for growth is the need to ensure that new development is of high quality and responds to local character. In managing change and retaining the qualities that make the Borough a desirable place to live the Council will support well designed and sympathetic sustainable development.
- 6.3.2 Barnet's Characterisation Study sets out the characteristics, qualities and value of different places within Barnet providing an understanding of the capacity for growth of different places within the Borough. The Study identifies the Borough's different architectural typologies and character areas and the pressures that they face. Many of these areas are suburban and terraced or semi-detached in nature.
- 6.3.3 The Characterisation Study should be used as a tool to help judge the effect of development on character. The Residential Design Guidance SPD provides more specific requirements on development that is suitable for Barnet's distinctive suburban character. Upon adoption of the Local Plan the Council will produce a Sustainable Design Guidance SPD. This SPD will replace two existing SPDs on Residential Design Guidance and Sustainable Design and Construction
- 6.3.4 Barnet's character also derives from the interrelationship that has developed over time between the built form and natural environment. The land now designated as Green Belt and Metropolitan Open Land has influenced the manner in which villages and suburbs have grown and coalesced. The built form of Barnet is more suburban in character; however, in and around the town centres the density of development increases and the architectural form is more diverse.
- 6.3.5 Character can be eroded through small incremental changes to houses such as replacement windows, doors, roofing materials, loss of gardens and trees, as well as larger scale changes such as loft conversions and extensions. This type of development can, over time, have a cumulative impact on local character.
- 6.3.6 The design of new buildings and shopfronts can have a significant impact on the appearance and character of a shopping area or street, particularly where facades and adverts are changed without careful thought. A shopfront may be of traditional or modern design and use a variety of materials, but should relate to the local street scene and observe the principles highlighted in Barnet's Sustainable Design Guidance SPD. New or altered shopfronts should be designed to respect the building of which they are part, as well as any adjoining shopfronts and the general street scene.

6.4 **Promoting High Quality Design**

- 6.4.1 The NPPF highlights the importance of good design in the creation of high quality buildings and places. As part of the planning reforms highlighted in the 2020 White Paper and in response to the Building Better Building Beautiful Commission “Living with Beauty” report the NPPF is being revised and a draft National Model Design Code published. The National Design Code sets out the characteristics of well-designed places and demonstrates what good design means in practice as well as providing detailed guidance on the production of Borough design codes and guides.
- 6.4.2 The Council will not approve designs for new development that is inappropriate to the local context or does not take opportunities to enhance the character and quality of an area. High quality design solutions help to make new places that can make a positive contribution to the existing suburban character. Detailed assessment of the impacts of development proposals will be based on a set of criteria that seek to ensure that the local character and existing context are reflected, to deliver high quality design, accessible buildings and connected spaces that are fit for purpose and meet the needs of local residents. Such criteria will be set out in the Sustainable Design Guidance SPD following adoption of the Local Plan
- 6.4.3 Contemporary design may be appropriate provided it has recognised the local context and responded effectively. Policy CDH01 ensures consistency on design across the Borough by making sure that all developments are underpinned by sustainable good growth with positive development outcomes, in terms of enhancing character, high quality design and appropriate amenity.
- 6.4.4 Good design should promote healthy lifestyles, cohesive neighbourhoods and create buildings that have minimal negative impact on the environment, during construction and beyond to demonstrate high regard for natural assets. Innovative good design will be encouraged, particularly when it can help mitigate negative impacts on the environment with simple solutions.
- 6.4.5 Reducing carbon dioxide (CO₂) emissions and adapting to future climate change are priorities for the Local Plan. All developments need to aim for zero carbon and should represent good quality design that demonstrates high levels of environmental awareness and contributes to climate change mitigation and adaptation.
- 6.4.6 Innovative and good design that can be considered of beauty will be encouraged and promoted in Barnet whilst poor design, that does not utilise opportunities to improve an area’s character and quality, and the way it functions, will not. The Council will expect developers to show how their proposals will achieve high quality inclusive design to ensure an accessible environment, outlining engagement with users in their Design and Access Statements.
- 6.4.7 The Local Plan incorporates the following core good design principles:
- Character: to promote a sense of place by responding to locally distinctive characteristics and patterns of development.

- Continuity and enclosure: to promote places where public and private spaces are clearly defined and building frontages positively contribute to the urban fabric.
- Quality of the public realm: to promote attractive, safe, inclusive public spaces and routes.
- Ease of movement: to create accessible and permeable places that are easy to move through.
- Legibility: promoting recognisable routes, landmarks, wayfinding and entrances.
- Adaptability: promoting buildings and places that can change use easily.
- Diversity: promoting places with variety and choice through mixed uses and building types.

6.5 Design Code for Small Sites

6.5.1 Small sites of infill development (normally below 0.25 hectares) have a significant role in Barnet's housing delivery - ensuring we get the right homes in the right places. The Council will pro-actively support well designed new homes on small sites in order to: 1) significantly increase the contribution of small sites to meeting Barnet's housing needs 2) diversify the sources, locations, type and mix of housing supply 3) support small and medium-sized housebuilders.

6.5.2 Small site development is typified by infill development on vacant or underused brownfield sites in existing residential areas. This type of development often faces a range of planning constraints and often causes considerable concerns to local communities because of its impact on amenity and character. Through the use of a specific Design Code for Small Sites a suite of clear and specific design parameters for development that responds to the context provided by Barnet's Characterisation Study. The Small Sites Design Code will form part of the Sustainable Design Guidance SPD.

6.6 Safety, Security and Design

6.6.1 A well designed environment can help to reduce both the real and perceived risk of crime. The design and layout of buildings, open spaces, roads and footpaths can influence opportunities to commit crime and also affect people's sense of safety and security. Appropriate design and layout of landscaping, planting and lighting can help reduce crime and the fear of crime. Development proposals should be designed to provide safety within the development site and in adjacent areas. Measures to design out crime should be integral to development proposals, adopting Secured by Design. The Council will ensure through conditions on planning consents that Secured by Design is applied.

- 6.6.2 Visual interest on a street can be created by active frontages, entrances, windows and shopfronts, which helps contribute to a sense of security. These frontages can be part of a building, boundary wall or fence or a roller shutter on a shopfront. Larger windows or shopfronts can make a more positive contribution to the vibrancy of frontages. This is most important in town centres, local centres or on major roads where active frontages should be incorporated at street level to contribute to the vibrancy of an area.
- 6.6.3 In line with policies ECY01 and ECY02 emerging proposals with new commercial and employment space should be discussed with the Council at pre-application stage to ensure we are getting new provision in the right locations. This, as highlighted in policies ECY01 and ECY02, will enable the requirements of workspace providers to be considered at the design stage and ensure that commercial space is designed for an end user. The Council will expect all new commercial and employment space to be designed to appropriate floor to ceiling heights and fitted out to a standard that allows for a straightforward occupation for commercial tenants. It will also assist appropriate affordable workspace providers to get involved early at the design stage.

6.7 Residential Space Standards

- 6.7.1 The nationally described space standard is a technical planning standard that takes into account the need for rooms to be able to accommodate a basic set of furniture, fittings, activity and circulation space necessary for effective use. The space standard in Table 9 sets out a comprehensive range of one, two and three storey dwelling types with one to six bedrooms and up to eight bedspaces (as well as studio flats). The London Plan applies the nationally described space standard as a minimum residential space standard for new dwellings. Any changes to the standards in the London Plan will be applied to development in Barnet. 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.
- 6.7.2 The Council will require residential development to provide floor areas that meet or exceed the minimum space standards for dwellings of different sizes. These figures are based on minimum Gross Internal floor Area (GIA) and are the minimum requirement for all residential development in Barnet.
- 6.7.3 Conversion of heritage buildings may present particular challenges for minimum space standards. In line with Policy CDH07, any impact on the heritage value will be weighed against the benefit brought from meeting the sustainable design and construction requirements.

Table 9 Minimum residential space standard requirements

Bedrooms	Bedspaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

1. *Where a one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.

2. The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (m²)

3. The nationally described space standard sets a minimum ceiling height of 2.3 metres for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

6.8 National Space Standards

6.8.1 Poor quality housing generated by the Government's relaxation of permitted development rights has caused significant concern within the Borough. The inadequacies of such accommodation has been further exposed by the COVID19 pandemic. This has now been recognised by the Government. All new dwellings created through permitted development rights from April 2021 will need to:

- have a gross internal floorspace of at least 37 square metres; or
- comply with the nationally described space standard.

6.9 Internal Layout and Design

- 6.9.1 To ensure that homes are fit for purpose and provide safe and healthy living environments the internal layout of rooms and design of dwellings is an important consideration. Barnet's requirements as set out in Table 10 are consistent with those in the London Plan. Any changes to the standards set out in the London Plan will be applied to development in Barnet. A minimum ceiling height of 2.5m for at least 75% of the dwelling area is required so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space. Dual aspect dwellings are encouraged and where single aspect flats are considered acceptable they should demonstrate that all habitable rooms and the kitchen are capable of providing good ventilation, privacy and daylight and the orientation enhances amenity, including views. COVID19 has highlighted the need for homes to be places for safe working as well as healthy living. New homes should be designed to enable a transition from living to working spaces and allow sufficient flexibility to adapt to the changing needs and circumstances of residents. This includes access to high quality digital communications infrastructure as set out in Policy TRC04.
- 6.9.2 In addition to general internal storage there should be 'dirty'²² storage space for items such as bicycles and buggies, which could be provided as a communal facility for flats. The level of provision as set out in the London Plan is:
- 1m² for flats without private gardens.
 - 2.5m² for houses, bungalows and flats with private gardens for up to four people.
 - 3.0m² for houses, bungalows and flats with private gardens for five or more people.
 - Any changes to the standards set out in the London Plan will be applied to development in Barnet.

Table 10 Internal layout and design requirements

	Development scale
A habitable room is a room within a dwelling – the primary purpose for which is for living, sleeping or dining, including kitchens where total area is more than 13m ² (including fittings), or the dining space if it is divided from the working area by a moveable partition. Rooms exceeding 20m ² will be counted as two.	
Minimum room dimensions and floor areas: Single bedroom: minimum floor area should be 7.5 m ² and is at least 2.15m wide to comply with the nationally described space standard Double/twin bedroom: minimum floor area should be 11.5 m ² and minimum width should be 2.75 m to comply with the nationally described space standard and every other double (or twin) bedroom at least 2.55m wide.	Minor, major and large scale residential
Ceiling heights A minimum ceiling height of 2.5m for at least 75% of the dwelling area. Habitable floorspace in rooms with sloping ceilings is defined as that with 1.5 m or more of ceiling height.	Minor, major and large scale residential
Development proposals should avoid single aspect dwellings that are north facing or exposed to noise exposure categories C & D or contain three or more bedrooms.	Minor, major and large scale residential

6.10 Amenity – Lighting, Privacy, Noise

6.10.1 Proposals that significantly harm the amenity of neighbouring occupiers will not be acceptable. Protecting amenity helps to protect residents' wellbeing and privacy. It is important to ensure that development does not significantly overshadow neighbouring buildings, block daylight, reduce sunlight, or result in a loss of privacy or outlook. Further guidance on standards affecting daylight, sunlight, privacy and outlook are set out within Barnet's suite of Supplementary Planning Documents.

6.10.2 Lighting can also affect amenity by creating light spillage and increasing glare. Proposals involving new lighting should demonstrate that they will not significantly impact on residential amenity. Proposals should seek to minimise any adverse impact of lighting schemes through design or technological solutions or by controlling the hours of use. The visual impact of light fittings should also be considered.

6.10.3 Noise can reduce the quality of life of people living or working in the Borough. Planning controls can help to minimise noise disturbance in new developments with planning conditions used to control the operating hours of a particular source of noise. Planning conditions can also be used to reduce the effects of noise on nearby noise sensitive residential uses, for example by screening with natural barriers or with consideration for the arrangement of buildings. The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Policy ECC02 sets out further details with regards to noise, in addition to London Plan Policy D13 which considers the impacts of noise-generating activities on a wider scale. Further guidance on managing and mitigating noise in mixed-use development and town centre development is also provided in the Mayor's London Environment Strategy.²³

6.11 Sustainable Residential Density

6.11.1 Policy GSS01 sets out the Council's strategic approach to development highlighting the locations where growth will be supported. The Council will seek to optimise rather than simply maximise housing density. This enables full consideration of the local context, relating appropriate density ranges to existing building form and massing as well as the location (central, urban, suburban), design-led beautiful buildings addressing national and local design codes, public transport accessibility and the provision of social infrastructure.

Policy CDH01 Promoting High Quality Design

a) In order to make the most efficient use of land residential proposals must be developed at an optimum density. A design-led approach to determine capacity should deliver an optimum density. This approach should consider local context, accessibility by walking and cycling and existing and planned public transport as well as the capacity of infrastructure.

b) All new development should be of a high architectural and urban design quality and have regard to the National Model Design Code, Barnet's Sustainable Design Guidance SPD and Design Code for Small Sites. This will ensure the resulting homes and local environment are of a high standard and biodiversity, water management and sustainable drainage measures are incorporated.

The Council will expect development proposals to:

- i. Respond sensitively to the distinctive local character and design, building form, patterns of development, scale, massing, roof form and height of the existing context.
- ii. Use materials of a suitable quality and appearance to respect local character and setting.
- iii. Ensure attractive, safe and, where appropriate, vibrant streets which are designed in accordance with the Healthy Streets Approach, and active frontages that provide visual interest, particularly at street level.

- iv. Adopt Secured by Design to create safe and secure environments that reduce opportunities for crime and help minimise the fear of crime.
- v. Apply the requirements set out in Tables 9 and 10 for the internal layout and design of new homes, in accordance with national residential space standards and the London Plan.
- vi. Allow for adequate daylight, sunlight, privacy and outlook for adjoining and potential occupiers and users.
- vii. Provide accessible outdoor amenity space to comply with Policy CDH05.
- viii. Mitigate noise impacts through design, layout, and insulation in accordance with the Agent of Change principle introduced through London Plan Policy D13

6.12 Sustainable and Inclusive Design

6.12.1 Standards set out in Policy CDH02 will help deliver high quality development in Barnet that is sustainable and inclusive. These standards are supported by Barnet's suite of design guidance Supplementary Planning Documents.

6.13 Climate Mitigation and Carbon Reduction

6.13.1 The Council is on a credible path to achieving net zero emissions and helping make London a zero-carbon city by 2050. The Council will abide to the Mayors work around designing for a Circular Economy and use the Mayor's energy hierarchy to help reduce carbon emissions from construction and operation and encourage retention and adaptation of existing buildings wherever practicable as well as encourage opportunities for on-site electricity and heat production, the use of innovative building materials and smart technologies.

6.13.2 Barnet supports the use of Building Research Establishment Environmental Assessment Method (BREEAM), which is used to measure the environmental performance of non-residential buildings. It assesses the following criteria to measure the overall performance of a building:

- **Energy:** The total energy used in the building and the amount of carbon dioxide (CO₂) produced.
- **Management:** Site management and procurement.
- **Health and Wellbeing:** Ensuring that there are adequate levels of day-lighting, sound insulation and air quality to improve the quality of living.
- **Transport:** Proximity of location to local transport facilities.
- **Water:** Consumption both inside and outside the house as well as energy efficient measures.
- **Materials:** The life cycle and impact of materials on the surrounding environment.
- **Waste:** Construction efficiency that will seek to promote better waste management and minimisation of waste materials.
- **Land use:** Size of building footprint as well as the use of the site.

- **Pollution:** Reduction of water and external air pollution emissions.
- **Ecology:** To ensure that there is minimum disruption to wildlife and there is a commitment to conserving and enhancing the site.

6.13.3 BREEAM New Construction and BREEAM (Refurbishment) represent the suite of environmental assessment schemes that are nationally managed by the Building Research Establishment (BRE)²⁵. Policy ECC01 expects all development to be energy-efficient and seek to minimise any wasted heat or power. Major development is expected to be in accordance with the Mayor's Energy Hierarchy to reduce carbon dioxide emissions (in accordance with Part L of the Building Regulations). All major development will be required to demonstrate, through an Energy Statement, compliance with the Mayor's zero carbon targets.

6.13.4 Exceptions to this requirement may be considered in cases concerning the refurbishment of listed buildings and buildings in conservation areas. Applicants will need to balance any harm caused to heritage assets against the wider sustainability benefits in consultation with the conservation and design team. Applicants should justify any exceptions in an Energy Statement.

6.13.5 Climate change will intensify localised climatic conditions, which can be mitigated through good design. It is essential that the microclimatic conditions of the urban environment are considered as part of the design process to ensure that the impacts of massing and building configuration can lead to acceptable standards of comfort and wellbeing. Full guidance and design principles should be referred to in the Sustainable Design and Construction SPD, with particular focus on wind and thermal conditions.

6.14 Accessibility and Inclusive Design

6.14.1 Inclusive design is fundamental to improving the quality of life for all Barnet's resident, particularly the disabled and elderly. It is intended to make the built environment safe, accessible and convenient. Good design should reflect the needs of different communities and not impose barriers of any kind. Development proposals should ensure that the needs of people with mobility difficulties, both physical and sensory, are taken into account at an early stage. This includes the public realm and any extensions or refurbishment works to buildings, particularly those used by the general public such as shops and community facilities.

6.14.2 The Council will require an Inclusive Design Statement as part of the Design and Access Statement. The London Plan (Policy D5 – Inclusive Design) sets out what is expected from an Inclusive Design Statement and signposts other guidance on Inclusive Design including the Accessible London – Achieving an Inclusive Environment SPG as well as British Standards BS8300 Volumes 1 and 2.

6.15 Accessible and Adaptable Dwellings

6.15.1 The growing and changing requirements for housing older people is one of the most important emerging planning issues for London. Increasingly, older people are choosing to live independent and semi-independent lives in their own homes resulting in a need for more accessible and adaptable dwellings that can meet their needs. Policy CDH02 sets out standardised accessibility and adaptability requirements for all new residential development. Part M of the Building Regulations is comprised of three optional categories:

- M4(1) – Category 1 Visitable dwellings.
- M4(2) – Category 2 Accessible and adaptable dwellings.
- M4(3) – Category 3 Wheelchair user dwellings.

6.15.2 Part M of the Building Regulations generally applies to new dwellings only and not to conversions or changes of use. The nationally described space standard also takes into account the spatial implications of providing improved accessibility and adaptability, particularly for older or less mobile people, and is capable of accommodating the requirements of both Category 1 and 2 accessibility standards in Approved Document M of the Building Regulations.

6.16 Wheelchair User Dwellings

6.16.1 Ten per cent of new housing should be designed to allow wheelchair user access that complies with part M4(3) of the Building Regulations. This requirement will therefore be applied to all major²⁴ residential schemes. London Plan Policy T6.1 H (Residential Parking) sets out specific requirements for disabled persons parking bays.

6.16.2 Approach routes, entrances and communal circulations should comply with the requirements of regulation M4(2), unless they also serve wheelchair user dwellings, where they should comply with the requirements of regulation M4(3). Further detail and advice on these implications and design aspects is provided under Standard 11 of the Mayor's Housing SPG, Transport for London Guidance, Planning Practice Guidance and Barnet's suite of design focused Supplementary Planning Documents.

Policy CDH02 Sustainable and Inclusive Design Sustainable Design and Construction

- a) All new development is required to mitigate the impacts of climate change, adopting sustainable technology and design principles in accordance with Policy ECC01.
- b) Major development is required to be net zero-carbon in accordance with the Mayor's Energy Hierarchy, supported by an energy masterplan to identify the most effective energy supply options and utilise energy from waste.

c) Development proposals are required to achieve a minimum BREEAM 'Very Good' rating in accordance with the Sustainable Design Guidance SPD²⁵.

d) Microclimate/Wind and Thermal Conditions are required to be managed in accordance with the Sustainable Design Guidance SPD.

Inclusive Design and Access Standards

e) Development proposals are required to meet the highest standards of accessible and inclusive design. An Inclusive Design Statement is required to ensure that proposals meet the following principles:

- i. can be used safely, easily and with dignity by all;
- ii. are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment; and
- iii. are designed to incorporate safe and dignified emergency evacuation for all building users

f) All residential development is required to meet Building Regulation M4 (2) 'accessible and adaptable dwellings'.

g) All major residential developments are required to provide 10% of new units as 'wheelchair user dwellings' in order to meet Building Regulation M4 (3).

6.17 Public Realm

6.17.1 The public realm is a key aspect of effective design in neighbourhoods and town centres to include all publicly accessible space between buildings. Public realm that is family and young people friendly can also contribute significantly to the health and wellbeing of residents, creating a sense of place that encourages social interaction amongst all age groups and provides opportunity for activity as well as enabling access to facilities such as public toilets and drinking fountains. Good public realm should be uncluttered so that all pedestrians including those that are mobility impaired can use pavements. Town centre public realm strategies will address in more detail the management of obstacles such as: shops which use pavements for displaying goods; advertisement hoardings; and telephone kiosks. There is a need to ensure that charging points for electric vehicles do not add to this list of obstacles. Public realm design should complement the buildings that frame the space to enable good connectivity, security and a variety of use. In terms of proposals that affect public places where crowds may congregate the Council will support the use of the Secured by Design Resilient Design Tool (RDT). Public realm enhancements should be informed by Historic England's 2018 publication 'Streets for All – London' the Mayor's Healthy Streets Approach and Public London Charter and Council's adopted strategies for town centres and public realm design frameworks.

- 6.17.2 Legibility and signposting make an important contribution in understanding and navigating around a place. Where properly planned, executed and managed, advertising can enhance peoples' experience of the public realm. The Council will work with the advertising industry to ensure these benefits are realised. Legible London is a pedestrian signage system that has been installed across London to aid effective way-finding. The uniform nature of these signs is critical to their success, particularly across borough boundaries. The Council's Long Term Transport Strategy encourages the use of pedestrian way-finding signage that is consistent in design and quality to Legible London, enhancing navigation and familiarity with the surroundings.
- 6.17.3 The design of public realm can support a shift to active travel, which with the Mayor's Healthy Street Indicators should form a key consideration when planning new development and integrated public spaces and networks. To help encourage accessibility throughout the day and night, lighting and security are an important to make the area welcoming whilst also minimising light pollution. Public art can help to create a distinctive character, adding visual interest, influencing the use of a space or acting as a focal point for understanding and navigating around a place.
- 6.17.4 For new development that does not include appropriate public realm as part of the scheme, there could be impact on public spaces or networks nearby, that should be considered within proposals. Opportunities to enhance or complement existing public realm will be encouraged by the Council. The Mayor's Public London Charter sets out the rights and responsibilities for users and owners of public spaces, regardless of whether they are public or private.

Policy CDH03 Public Realm

Development proposals should:

- a) Relate to the local and historic context and incorporate high quality design, landscaping, planting, street furniture and surfaces, including green infrastructure and sustainable drainage provision.
- b) Be designed to meet Healthy Street Indicators, promote active travel and discourage car usage, with avoidance of barriers to movement and consideration given to desire lines.
- c) Provide a safe and secure family and young people friendly environment for a variety of appropriate uses, including meanwhile uses and open street events.
- d) Utilise the Secured by Design Resilient Design Tool for places where crowds may congregate.
- e) Consider the relationship between building design and the public realm to enhance amenity value, vibrancy and natural surveillance.
- f) Ensure appropriate management of publicly accessible private space in accordance with the Public London Charter, Council town centre strategies and public realm design frameworks.
- g) Incorporate high quality public art (where appropriate).
- h) Ensure that way-finding pedestrian signage is sensitively located and consistent with Legible London.

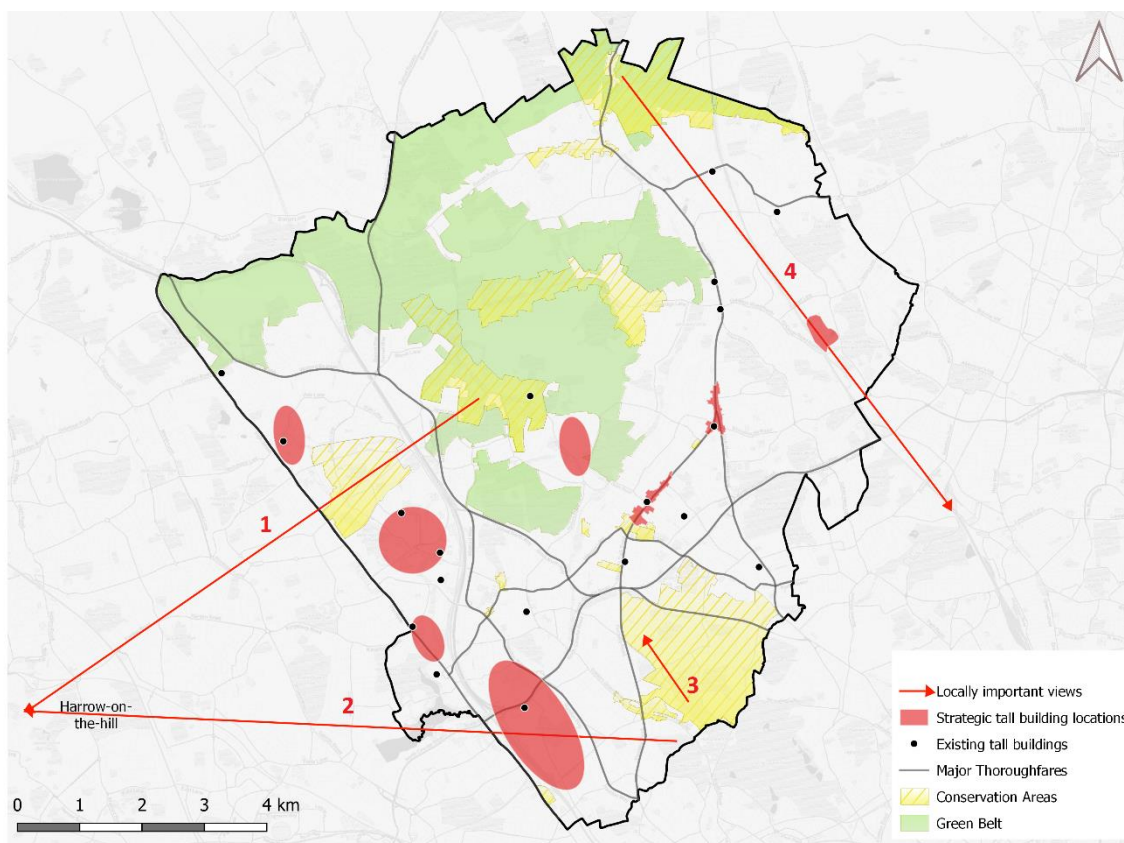
6.18 Tall Buildings

- 6.18.1 The predominant and largely residential suburban character of Barnet is two or three storeys. However, as the Borough changes over the next fifteen years certain locations will evolve a different local character as tall and medium rise buildings are expected play a greater part in new development.
- 6.18.2 Tall buildings can form part of a strategic approach to optimising the capacity of sites through comprehensive redevelopment. Such sites must be well-connected by public transport and have good access to services and amenities. As part of a placemaking strategy they can help to emphasise the character of a place as a centre of activity. Tall buildings that are of exemplary architectural quality can make a positive contribution to Barnet and become a valued part of the identity of places such as Brent Cross and Colindale as well as Growth Areas and Town Centres such as Cricklewood, Edgware, Finchley Central and North Finchley and along historic routes such as the Edgware Road (A5) and the Great North Road (A1000)
- 6.18.3 While tall buildings offer the opportunity for intensive use, their siting and design should be carefully considered so not to detract from the nature of surrounding places and the quality of life for those living and working around them. A design-led approach is essential to determine the most appropriate form of development that responds to existing context and capacity for growth, with due consideration to existing and planned supporting infrastructure. Due to their potential impact, development proposals that include tall buildings will need to demonstrate compliance with Policy CDH04 as well as the requirements listed in the London Plan Tall Buildings policy D9 which emphasises that proposals for tall buildings should address the visual, functional and environmental impacts of such structures. Regard should also be made to Historic England's guidance on tall buildings²⁶. Proposals for tall buildings of more than 30 metres in height (equivalent to 9 storeys will be referred to the Mayor of London).
- 6.18.4 The London Plan requires Development Plans to define, based on local context, what is considered a tall building for specific localities. Barnet through the 2012 Local Plan established it's definition of a tall building as a structure having a height of 8 storeys or more (equivalent to 26 metres or more above ground level). This is on the basis that a storey is generally 3 to 3.25 metres in height. The 2012 Local Plan also identified strategic locations where tall buildings may be appropriate.

- 6.18.5 Barnet's Tall Buildings Study Update informs Barnet's Local Plan, providing detailed contextual and spatial analysis to establish a design-led approach to future development of tall buildings in the Borough. It investigates the potential opportunity for development of tall buildings, considering existing and approved development to identify suitable locations and heights in these areas. The Update provides the basis for identifying strategic locations where proposals for tall buildings may be appropriate. These locations include Opportunity Areas such as Brent Cross-Cricklewood and Colindale as well as town centres and major thoroughfares which have a long established association with buildings of 8 storeys or more. The Update provides a contextual and spatial analysis of the A5 and A1000 corridors as well as Finchley Central Town Centre covering all (with the exception of New Southgate Opportunity Area) the identified strategic locations and sets the basis for a design led approach covering parameters, scale and height that will be established through a Supplementary Planning Document on Building Heights. Within the New Southgate Opportunity Area the Council will consider bringing forward a joint area planning framework with LB Enfield and LB Haringey. Consideration of the parameters for tall buildings in New Southgate will be a key feature of the area planning framework.
- 6.18.6 Since the definition of a Tall Building was established in the 2012 Local Plan new buildings of height have been developed within the Borough's identified strategic locations. This reflects a rising trend in Outer London with tall building development a consequence of estate regeneration programmes, increasing housing targets and comparatively lower land values in the suburbs. Reflecting the increase in the development of tall buildings within Barnet, notably around Colindale and West Hendon, since 2012 there is a need to recognise local variation and application so as to positively assist delivering tall buildings in the right place and at appropriate height. In addition, the London Plan expects boroughs as part of a plan led approach to determine the maximum acceptable height of tall buildings (London Plan para 3.9.2). An additional definition of a Very Tall Building set at 15 storeys or more (45 metres or more above ground level) has been introduced
- 6.18.7 Very Tall Buildings will not be permitted in the strategic locations identified in Policy CDH04 unless exceptional circumstances can be demonstrated. Such circumstances can include appropriate siting within an Opportunity Area or Growth Area. Opportunity Areas are designated within the London Plan as the capital's principal opportunities for accommodating large scale development on the basis of Area Frameworks that set parameters for development proposals in the area. Opportunity Areas are areas of extensive change while Growth Areas are distinctive locations with good public transport accessibility. They have a supply of brownfield and underused land and buildings that offer opportunities for inward investment. Growth Areas, together with the District Town Centres, provide identified developable and deliverable sites with substantial capacity for new homes, jobs and infrastructure. Each strategic location identified in Policy CDH04 is subject to more detailed policy in the Chapter on Growth and Spatial Strategy.

- 6.18.8 Proposals for tall buildings should use the Barnet Characterisation Study as a starting point for a 360° appraisal of the impact of the design of all buildings of height on their surrounding area. The Council will work with the Mayor to utilise 3D virtual reality digital modelling to help assess tall building proposals and aid public consultation and engagement. 3D virtual reality modelling can be used to help assess cumulative impacts of developments, particularly those permitted but not yet completed. Proposals should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. Varying heights, proportion, silhouette and facing materials at the design stage will help assess how to lessen any negative impacts including light pollution, reflected glare. Architectural quality and materials of an exemplary standard should ensure that the appearance and architectural integrity of the building is maintained through its lifespan. London Plan policy D9 – Tall Buildings sets out further considerations on the functional impact including ensuring the safety of occupants and surrounding areas through internal and external design as well as servicing, maintenance and building management arrangements which should be considered at the start of the design process. In terms of environmental impacts wind, daylight, sunlight penetration and temperature conditions must be carefully considered and air movement affected by the building(s) should support the effective dispersion of pollutants and not detract from the comfort and enjoyment of open spaces around the building. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.
- 6.18.9 Policy GSS09 highlights residential led mixed-use opportunities for design-led infill development on the major thoroughfares of Barnet as shown on the Key Diagram. Although there has been a loss of original residential character along these routes there is an opportunity for infill development including Tall Buildings (where appropriately located on Edgware Road (A5) and Great North Road (A1000)) to have a positive impact on the environment of the thoroughfare. It is imperative that such design-led proposals should relate to the suburban streets behind the thoroughfare. The loss of original character together with good public transport accessibility has contributed to the promotion of such thoroughfares for higher density development. There is also a desire to better manage the development proposals that are coming forward in such locations.
- 6.18.10 High density development can be delivered through well designed compact development that does not necessarily have to be a tall building. Tall buildings generally cost more to construct per unit of floor area than low or medium rise buildings, have longer build out times and are also considered less sustainable overall due to environmental effects and higher energy requirements. While tall buildings offer the opportunity for more intensive use, it is essential that proposals occur in the most suitable and sustainable locations that can protect and enhance the existing character and townscape of the Borough.

Map 4 – Locally important views



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6.18.11 New tall buildings should positively contribute to the character of the area. Proposals should take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are tangible public benefits derived that outweigh that harm. Riverside locations are often an attractive choice for developments with tall buildings offering views over the landscape and river. However, if tall buildings are located too close to a watercourse they can cause overshadowing, create wind corridors and introduce artificial light spill which can disrupt vegetation growth and the attractiveness of the river corridor area as habitat or migratory/foraging routes for wildlife, such as bats, insects and birds. In order to avoid such impacts taller buildings should be to be set back further, more than 10 metres, to provide a substantial buffer zone adjacent to the river, and to preserve and enhance the river corridor area.

- 6.18.12 The Council requires that visual impact is addressed in terms of long range views from the top of the building, mid-range views from the surrounding neighbourhood and intermediate views from the surrounding streets. Map 4 shows locally important views, conservation areas in the Borough, Green Belt / MOL and the location of existing tall buildings together with the strategic locations (including Opportunity Areas) identified for tall buildings. The Council will seek to ensure that development is compatible with such views in terms of setting, scale and massing. Proposals for buildings of height that the Council considers cause harm to these views will be resisted.

Policy CDH04 Tall Buildings

a. Tall buildings (8 to 14 storeys (26 to 46 metres above above ground level)) may be appropriate in the following strategic locations:

- Brent Cross Growth (Opportunity) Area (Policy GSS02);
- Brent Cross West Growth (Opportunity) Area (Policy GSS03);
- Colindale Growth (Opportunity) Area including Grahame Park Estate (Policy GSS06);
- Cricklewood Growth (Opportunity) Area (Policy GSS04);
- Edgware Growth Area (Policy GSS05);
- West Hendon Estate (Policy GSS10);
- New Southgate Opportunity Area²⁷ (Policy GSS09);
- Major Thoroughfares - Edgware Road (A5) and Great North Road (A1000) (Policy GSS11); and the
- Town Centres of Finchley Central and North Finchley (Policy GSS08)

b) Tall buildings of 15 storeys or more ('Very Tall') will not be permitted unless exceptional circumstances can be demonstrated, such as appropriate siting within an Opportunity Area or Growth Area.

c) Any proposal for a 'Very Tall' building must have a legible and coherent role, integrating effectively to its location in compliance with part d)

d) The Council will produce SPD on Building Heights which will set out, within the identified strategic locations, the parameters for tall and very tall buildings.

e) Proposals for Tall and Very Buildings will be assessed in accordance with the visual, functional, environmental and cumulative impacts set out in London Plan Policy D9 – Tall Buildings. Particular attention will be given to assessing the following:

- i. how the building relates to its surroundings, both in terms of how the top affects the skyline and how its base fits in with the streetscape, and integrates within the existing urban fabric, contributing to pedestrian permeability and providing an active street frontage where appropriate,
- ii. how the building responds to topography, with no adverse impact on longer range Locally Important Views (as shown in Map 4), as well as mid-range and intermediate views
- iii. the buildings contribution to the character of the area. Proposals should take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings.
- iv. the relationship between the building and the surrounding public realm, ensuring that the potential microclimatic impact does not adversely affect levels of comfort, including wind, daylight, temperature and pollution

v. the relationship between the building and the natural environment, including public open spaces and river corridors Taller elements should be set back from any rivers and water courses and designed so as not to cause harm to the wildlife, including directing artificial light away from the river corridor.

vi. buildings should not interfere with digital connectivity in compliance with Policy TRC04 nor have a possible negative impact on solar energy generation on adjoining buildings

Proposals for tall and very tall buildings will need to provide evidence of how they have complied with the criteria in this policy as well as the London Plan Policy D9 and Historic England guidance on tall buildings.

Proposals for redevelopment or refurbishment of existing tall buildings will be required to make a positive contribution to the townscape.

Proposals should be of an exemplary standard in architectural quality and materials to ensure the appearance and architectural integrity of the building is maintained

Barnet's definition of a Tall Building and identification of strategic locations where tall buildings may be appropriate does not mean that all buildings up to 8 storeys or to a height of 26 metres are acceptable in these locations or elsewhere in the Borough. Such proposals will be assessed in the context of other planning policies, in particular Policy CDH01 – Promoting High Quality Design, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area

6.19 Extensions

6.19.1 Most development in Barnet involves the replacement, extension or conversion of existing buildings. The majority of this development is on residential properties.

6.19.2 The Council acknowledges the contribution of residential conversions to diversifying Barnet's housing supply. In locations with good service provision and transport accessibility this form of accommodation, when appropriately designed, can be attractive to first time buyers and downsizers. This positive contribution however is largely undone by residential conversions that are inappropriately located. Policy HOU03 addresses the issue of managing conversions with respect to the overall housing stock and highlights those locations in the Borough where they may be more appropriate. It addresses the cumulative impact on the character of areas by changing external appearance and increasing activity from more people movement, increased car usage and parking stress as well as greater demands on servicing.

6.19.3 Policy CDH05 applies to all extensions, commercial, public as well as residential uses. The Policy highlights that context and local character are key considerations in the design of extension development. Extensions should not impact on the character of the surrounding area or cause harm to established gardens, open areas or nearby trees. There should be no significant adverse impact on the amenity of neighbouring properties.

Policy CDH05 Extensions

Proposals for extensions should follow good design principles in accordance with Barnet's suite of design focused SPDs. Measures such as green roofs and small scale renewable energy infrastructure that improve the sustainability of buildings will be encouraged.

Extensions to properties should:

- a) Complement the character of the existing building, particularly in terms of scale, style, form and materials.
- b) Be subordinate to the existing building in terms of size, scale or and height and in the case of upward extensions of tall buildings, comply with Policy CDH04.
- c) Incorporate a roof profile and materials sympathetic to the existing property.
- d) Maintain an acceptable outlook and adequate spacing between any surrounding buildings.
- e) Retain satisfactory amenity space.
- f) Avoid adverse impacts on the sunlight/daylight to neighbouring properties.
- g) Maintain or improve the appearance of the locality or street scene.
- h) Respect the privacy of surrounding residents, having regard to the position of windows, layout/use of rooms, any changes in land levels, floor levels and boundary treatment.
- i) Not result in a significant cumulative impact on the environmental quality of the area.
- j) Improve energy efficiency and incorporates renewable sources of energy.
- k) Extensions to existing properties should not result in amenity space provision falling below the standards set out in Table 11.

6.20 Basements

6.20.1 Basement development, or extensions that go beyond permitted development rights, and which involve excavation of land, helps create additional space for homes. However, the excavation involved in basement development can have implications for ground water conditions leading to ground instability and/or increased flood risk and water table problems for the roots of existing well established trees.

6.20.2 Policy CDH06 refers to basement development that also includes lightwells or basement light shafts, and other underground development at or below ground level. When it refers to garden space this includes unbuilt, private open space on the property which includes grassed and landscaped areas, paving and driveways. Policies relating to design, heritage, flood risk and open space are also relevant to basement development and will be taken into account when considering such schemes. Policy CDH06 highlights the importance of taking account of context and local character in the design of basement development. Basements should not impact on the character of the surrounding area or cause harm to the established garden, open area, nearby trees. There should be no significant adverse impact caused to the amenity of neighbouring properties.

Policy CDH06 Basements

Proposals for basements should follow good design principles in accordance with the Barnet's suite of design focused SPDs

Basement proposals to properties should:

- a) Ensure that tree roots on or adjoining the site are not damaged;
- b) Ensure that not more than 50% of the amenity space (garden or front court yard) is removed;
- c) Have no demonstrable adverse impact on neighbouring ground water conditions.
- d) Be subordinate to the property being extended and respect its original design, character and proportions for any visible aspects of the extension;
- e) Ensure railings, grilles and other light-well treatments avoid creating visual clutter and detracting from an existing frontage or boundary wall, or obscuring front windows;
- f) Be able to function properly for the purpose intended, with rooms of an adequate size and shape receiving natural lighting and ventilation. All habitable rooms within basement accommodation should have minimum headroom of 2.5 metres;
- g) Consider impact of forecourt parking on light to basement windows; and
- h) Not be located in Flood Zone 3B.

6.21 Amenity Space and Landscaping

6.21.1 Outdoor amenity space is highly valued to help protect and improve the living standards of residents enabling them to engage with the locale as well as contribute to maintaining and enhancing the wider character of the Borough. Minimum private open space standards, as set out in Table 11 have been established in the same way as the internal space standards (as set out in Table 9), by considering the spaces required for furniture, access and activities in relation to the number of occupants. The resultant space should be of practical shape and utility and care should be taken to ensure that the space offers good amenity. This space does not count towards the Gross Internal Area (GIA) used in calculating internal space standard.

6.21.2 Residential units with insufficient garden or amenity space are unlikely to provide good living conditions for future occupiers. For houses, amenity space should be provided in the form of individual rear gardens. For flats, options may include provision of communal spaces around buildings, on roofs, balconies or winter gardens. Within town centres there may be a requirement for wider contributions to an improved public realm.

6.21.3 Amenity space for new development should meet the standards set out in Table 11. In tall buildings, where site constraints make it difficult to provide private outdoor open space that offers good amenity for all units, additional internal living space that is equivalent to the area of the private open space requirement will be expected as an integral part of the design. This additional space must be added to the minimum GIA internal space standard. Where the standards cannot be met and an innovative design solution is not possible the Council will seek a Planning Obligation. Barnet's Planning Obligations SPD sets out the S106 criteria requirements for open spaces. 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. Similarly, residential development in areas of playspace deficiency as well as those in areas with sufficient playspace will normally be expected to make a contribution either on site or financially for playspace. Further information on areas of open space and playspace deficiency in Barnet and is set out in the Planning Obligations SPD.

Table 11 Outdoor amenity space requirements

	Development Scale
For Flats: A minimum 5m ² of private outdoor space should be provided for 1-2 person dwellings and an extra 1m ² provided for each additional occupant.	Minor, Major and Large scale
For Houses: <ul style="list-style-type: none"> •40 m² of space for up to four habitable rooms •55 m² of space for up to five habitable rooms •70 m² of space for up to six habitable rooms •85 m² of space for up to seven or more habitable rooms 	Minor, Major and Large scale
Development proposals will not normally be permitted if it compromises the minimum outdoor amenity space standards.	Householder

6.21.4 Outdoor amenity space should be designed to cater for all household needs including those of the elderly, young children and families. The space should be accessible for wheelchair users and should also facilitate use for disabled people in terms of paving, lighting and layout. It is important to distinguish boundaries between public, private and communal areas in order to identify who will take responsibility for the maintenance and security of private and semi-private areas. Further guidance is set out in Barnet's suite of design focused SPDs.

6.21.5 Children's play spaces should also be provided in all new residential development containing flatted schemes with the potential occupancy of 10 or more child bedspaces, as set out in the Mayor's SPG Shaping Neighbourhoods: Play and Informal Recreation. Play spaces should provide a stimulating environment and form an integral part of the surrounding neighbourhood, overlooked for natural surveillance and with safety and security in mind. Residential development will normally be expected to make a contribution either on site or financially for play space.

6.22 Landscaping, Trees and Gardens

6.22.1 High quality landscape design can help to create spaces that provide attractive settings for both new and existing buildings, enhancing the integration of a development into the established character of an area. Hard and soft landscaping proposals should make a positive contribution to the character and appearance of the site and the surrounding area, maximising urban greening where possible.

6.22.2 Landscaping of development sites should be included as an integral part of a proposal at an early stage and approved before work on site commences. Careful consideration should be given to the existing character of a site, its topography and how features such as planting, trees, surface treatments, furniture, lighting, walls, fences and other structures are to be designed and used effectively. More detailed advice about the use of landscaping is provided in Barnet's suite of design focused SPDs together with the Green Infrastructure SPD

6.22.3 The Council will seek to retain existing wildlife habitats such as trees, shrubs, ponds and hedges wherever possible. Where trees are located on or adjacent to a site the Council will require a tree survey to accompany planning applications indicating the location, species, size and condition of trees. Trees should be retained wherever possible and any removal will need to be justified in the survey. Where removal of trees and other habitat can be justified, appropriate replacement should consider both habitat creation and amenity value.

6.22.4 The NPPF and London Plan require development to provide a net biodiversity gain of at least 10%²⁸. To demonstrate that the development is providing a positive contribution to biodiversity a development must meet the requirements of Policy ECC06.

6.22.5 Trees make an important contribution to the character and appearance of the Borough as well as reducing surface water run-off, improving air quality and benefits for wellbeing. Trees that are healthy and are of high amenity value can be protected by a Tree Preservation Order (TPO) under the Town and Country Planning Act 1990. Further detail is provided in the Green Infrastructure SPD.

6.22.6 Sustainable Urban Drainage Systems (SUDS) aim to use drainage methods which mimic the natural environment. Swales are linear vegetated drainage features in which surface water can be stored or conveyed. They provide a good example of SUDS which can be incorporated into landscaping. Further guidance on SUDS is set out in Barnet's suite of design focused SPDs

6.22.7 Gardens make a significant contribution to local character, enhancing biodiversity, landscaping including trees, tranquillity, sense of space and the setting of buildings. Front gardens also support local character, visually enhance suburban residential streetscape and environmentally friendly local character. Garden development that is considered to be detrimental to local character, such as large extensions or infill will be refused. Further guidance on managing the impact of development on gardens is set out in Barnet's suite of design focused SPDs

Policy CDH07 Amenity Space and Landscaping

- a) Development proposals should as a minimum provide:
- i. Amenity space standards as set out in Table 11.
 - ii. Play spaces in accordance with the London Plan and the Mayor's SPG on Shaping Neighbourhoods – Play and Informal Recreation.
 - iii. Where amenity space does not meet the standards in (i) or (ii) contributions to off-site provision will be expected.
- b) Development proposals to include hard and soft landscaping must ensure that:
- i. Design and layout is sympathetic to the local character, whilst providing effective amenity and access with minimal visual impact, with particular regard to parking areas.
 - ii. Hardstandings should contribute positively to the streetscene, maintaining a balance between hard and soft landscaping, with opportunities taken to add wild gardens supported where possible.
 - iii. Provision is made for an appropriate level of new and existing wildlife habitat including tree and shrub planting to enhance biodiversity. There is no net loss of wildlife habitat and that there is a biodiversity net gain of at least 10%, either within the development site or off site and in accordance with Policy ECC06.
 - iv. Existing trees and their root systems are safeguarded, or replaced if necessary with suitable size and species of tree.
 - v. Provision is made for Sustainable Urban Drainage Systems.

6.23 **Barnet's Heritage**

6.23.1 The Council takes a positive approach to the conservation and enhancement of the historic environment and recognises the wide benefits it can bring to the local economy, character, and distinctiveness of the Borough. Barnet's historic environment significantly contributes to the Borough and its sense of place and therefore all new development should respect the character and distinctiveness of Barnet's historic environment. The historic environment is reflected in the designation of 16 conservation areas, the majority of which are supported by conservation area character appraisals. Barnet has over 650 statutory listed building entries on the National Heritage List. The Borough has 5 Registered Parks and Gardens on Historic England's Register of Parks and Gardens. The Borough also has London's only Registered Historic Battlefield, the site of the Battle of Barnet (1471), which is of national significance and lies to the north of Chipping Barnet. There are also two Scheduled Monuments, at Brockley Hill in Edgwarebury and at the Manor House in Finchley, five pre-historic, four Roman and thirty medieval sites containing archaeological remains of more than local importance. These have been grouped into nineteen 'Local Archaeological Priority Areas' as shown on the Policies Map. In addition to these heritage assets the Council maintains a Local Heritage List consisting of over 1200 non-designated heritage assets.

6.23.2 National planning policy distinguishes between designated and non-designated heritage assets. Table 12 lists Barnet's heritage assets (including statutory listed buildings, battlefield sites, Registered Parks and Gardens, Scheduled Monuments, Local Areas of Special Archaeological Significance and Conservation Areas) and non-designated heritage assets (locally listed buildings)²⁹ These assets are an irreplaceable resource and the Council will therefore assess proposals based on a presumption that the heritage asset should be conserved while looking for opportunities to enhance a heritage asset's significance. The Council recognises that well designed development can make a positive contribution to and better reveal the significance of heritage assets. The Council takes a proactive approach to conserving its heritage assets in a number of ways. These include: the publication of Conservation Area Character Appraisals; working with Conservation Area Advisory Committees; working with Historic England to remove heritage at risk assets from the register; the establishment of a Local Heritage List; and the production of Design Guidance and Codes.

6.24 **Heritage assets**

6.24.1 The Council will not permit harm to a designated heritage asset unless the public benefits, which can include heritage benefits, of the proposal outweigh the harm. More detailed guidance on public benefits is set out in National Planning Practice Guidance. Harm to or loss of a designated heritage asset requires clear and convincing justification. In determining applications affecting heritage assets the Council will take into consideration the scale of the harm and the significance of the asset.

6.25 Conservation areas

- 6.25.1 The Council has adopted a series of conservation area character appraisals which serve as a material consideration when assessing planning applications for development in conservation areas. The Council will manage changes in a way that ensures the distinctive characters of conservation areas is retained and new development makes a positive contribution to the conservation areas in particular that it preserves or enhances the special character or appearance of that area. The character of a conservation areas derives from a combination of factors such as built form and scale of its historic buildings and density, the pattern of development, the overall landscape including the topography and open space. In addition, characteristic materials, architectural detail and historic uses are significant. The design of new development should identify and respond to such elements. Design and Access Statements must include an assessment of the historic local context and character and clarify how new proposals have been informed by it and respond to it.
- 6.25.2 Barnet's conservation areas can also be impacted by development outside of the conservation area but may be visible from within it. This can include high or bulky buildings, which can have a detrimental impact on areas that may be some distance away, as well as development that may be sit alongside a conservation area. The Council will oppose development outside conservation areas, including in neighbouring boroughs, that it considers could cause harm to the character, appearance or setting of any conservation area.
- 6.25.3 The loss of traditional uses can erode the character of an area. It is essential therefore that traditional uses are not displaced by redevelopment proposals for change of use. Public houses and local shops are of particular importance to the character of conservation areas especially when they are traditionally located in historic buildings. The Council will seek to protect traditional uses of buildings where viable.
- 6.25.4 When considering applications for demolition of buildings that are locally listed or are considered to make a positive contribution, the Council will take into account the significance of the building and its contribution to the conservation area. The Council will resist the total or substantial demolition of such buildings, including proposals for facadism, unless significant public benefits, which should include heritage benefits, are shown that outweigh the case for retention. Applicants will be required to have regard to National and Local Plan policies and any other relevant supplementary guidance produced by the Council in order to justify the demolition of a building that is considered to make a positive contribution to a conservation area. All planning applications proposing total or substantial demolition within conservation areas must clearly demonstrate that effective measures will be taken to ensure the structural stability of all retained fabric during demolition and re- building. The Council must be satisfied that any approved development will proceed within an agreed timespan.

- 6.25.5 The loss of historic architectural details can erode the character and appearance of a conservation area. Proposals for alterations should be undertaken in materials matching that of the original. Where traditional architectural features have been lost, re-instatement of such elements will be considered provided sufficient evidence exists for an accurate replacement.
- 6.25.6 The use of Article 4 Directions to remove permitted development rights will be considered where the character and appearance of a conservation area is considered to be under threat by the loss or alteration of traditional architectural details.
- 6.25.7 Gardens, trees and green spaces make an important contribution to the character and appearance of Barnet's conservation areas. Proposals which cause the loss of trees or garden space, such as conversion of front gardens to hardstanding will be refused where such proposals are considered to cause harm to the character and appearance of a conservation area.

6.26 **Statutory Listed buildings**

- 6.26.1 Barnet's statutory listed buildings and structures make a significant contribution to the Borough's architectural legacy. They provide places for people to live and work in, are often cherished local landmarks, some of which contribute to their local areas as visitor attractions and make important and valued contributions to the appearance of the Borough. The Borough has a duty to preserve such assets for both present and future generations and such buildings will be protected under such policies as set out in the NPPF.
- 6.26.2 Consent is required for any alterations, including some repairs, which would affect the special interest of a statutory listed building and the Council will exercise their duty when considering proposals for all external and internal works that would affect the special architectural or historic interest of these assets.
- 6.26.3 The setting of a listed building is not fixed and may change as the asset and its surroundings evolve. The setting itself is not designated and its importance depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. New development can impact on the setting of listed buildings and any adverse impact should be avoided. Historic England has produced guidance on managing change within the setting of heritage assets and proposals will be expected to be in line with this guidance.

6.27 **Energy Efficiency and Historic Buildings**

6.27.1 Whilst the Council recognise that historic buildings, including those in conservation areas, can be sensitively adapted to improve their energy efficiency and respond to the issue of climate change proposals to improve the energy efficiency of statutory listed buildings must be able to clearly demonstrate that they will not cause harm to the special architectural and historic interest of the building or group to which it belongs. When assessing applications for improving the energy efficiency of historic buildings the Council will weigh the public benefits up against the possible harm that such proposals may have to the significance of the building. Guidance on the thermal improvements of historic buildings can be found on the Historic England website

6.28 Archaeological Priority Areas

6.28.1 Archaeological remains, above and below ground level, and Scheduled Monuments, are important surviving evidence of Barnet's past and once removed are lost forever. Due to the long history of human habitation across Barnet there are archaeological sites and areas, that are designated, undesignated and yet to be discovered; therefore all applications that have the potential to impact archaeological heritage assets should be supported by an archaeological desk based assessment. The aim of the assessment is to identify the scale and significance of the archaeological impact. An archaeological field evaluation may also be necessary. The Council will consult with Historic England and the Greater London Archaeology Advisory Service (GLAAS) on the implications of development proposals in Archaeological Priority Areas. GLAAS holds further information on archaeological sites in Barnet. When considering proposals which have the potential to impact on archaeological remains, the Council will have regard to the NPPF. It may also be appropriate for Hendon and District Archaeology Society (HADAS) to be consulted.

6.29 Registered Parks and Gardens

6.29.1 Barnet has five Registered Parks and Gardens

- Golders Green Crematorium (grade I);
- East Finchley Cemetery (grade II*);
- St Pancras and Islington Cemetery (grade II*);
- Avenue House Grounds (grade II); and
- Hoop Lane Jewish Cemetery (grade II).

6.29.2 These are considered to have historical significance as they have been skilfully planned with surroundings reflecting the landscaping fashions of their day. The emphasis for their recognition is on 'designed' landscapes, rather than on planting or botanical importance. Development in the immediate surrounds of these Registered Parks and Gardens should be designed in a manner that does not detract or harm their significance or setting.

6.30 Scheduled Monuments

6.30.1 Barnet has two Scheduled Monuments, at Brockley Hill in Edgwarebury and at Manor House in Finchley. Scheduled Monument consent must be obtained from the Secretary of State for Digital, Culture, Media and Sport with applications made to Historic England before any alterations are made to them.

6.31 Registered Battlefield

6.31.1 Barnet also has London's only Registered Historic Battlefield, the site of the Battle of Barnet (1471), which is of national significance and lies to the north of Chipping Barnet. The Growth Strategy highlights that the Council wants to promote such assets in order to increase visitor expenditure. The Battlefield together with the Registered Parks and Gardens within the Borough are landscapes of special historic interest.

6.32 Heritage at Risk

6.32.1 Barnet's Heritage at Risk Register is updated through the Authorities Monitoring Report. The Council will work with Historic England, asset owners, developers and other stakeholders to find solutions to buildings, sites and places on the Heritage at Risk Register. Developers considering the re-development of sites containing buildings on the Register must work with the Council and Historic England to determine the best course of action to retain and restore the historic asset.

6.33 Local Heritage List

6.33.1 Barnet has many historic, locally significant buildings which make a positive contribution to the distinctiveness of local areas, including conservation areas. The NPPF identifies such buildings and structures as non-designated heritage assets. Barnet has a Local Heritage List which identifies buildings of historic or architectural interest. The Council may identify any potential non-designated heritage asset when considering development proposals. In considering applications that affect these non-designated heritage assets, the Council will have regard to the significance of the asset and the scale of any harm or loss. There is a presumption in favour of retaining all Locally Listed Buildings as well as any building which makes a positive contribution to the character or appearance of a Conservation Area. The Council will need to be satisfied that all efforts have been made to continue the present use or to find compatible alternative uses before considering demolition as a viable option, including marketing the property for the sole purpose of its ongoing use. In line with the NPPF a deteriorated condition as a result of deliberate neglect or damage to a heritage asset will not be a factor considered in any decision. The LPA will assess proposals for demolition by taking into consideration both the condition of the existing building (particularly if it is beyond repair and its continued use is unviable) and the merits of the alternative proposals for the site

Table 12 - Barnet's Heritage Assets

Listed Buildings	651 entries
Battlefield Site	Battle of Barnet 1471
Registered Parks and Gardens	5 registered historic parks and gardens; St Marylebone Cemetery, Avenue House Garden, Golders Green Crematorium, St Pancras Cemetery and Hoop Lane Jewish Cemetery.
Scheduled Monuments	Brockley Hill Romano – British Pottery, Edgware Manor House Moated Site, East End Road, Finchley
Archaeological Priority Areas	<ol style="list-style-type: none"> 1. Barnet Gate and Totteridge Fields 2. Burnt Oak 3. Child's Hill 4. Chipping Barnet 5. Cophall 6. Cricklewood 7. East Barnet 8. East Finchley 9. Edgware 10. Edgwarebury and Scratchwood 11. Finchley 12. Friern Barnet 13. Galley Lane 14. Halliwick Manor House 15. Hendon 16. Mill Hill 17. Monken Hadley Common 18. Totteridge and Whetstone 19. Watling Street.
Conservation Areas	<ol style="list-style-type: none"> 1. The Burroughs, Hendon, 1983 2. Church End, Finchley, 1979 3. Church End, Hendon, 1983 4. College Farm, Finchley, 1989 5. Cricklewood Railway Terraces, 1998 6. Finchley Garden Village, 1978 7. Golders Green Town Centre, 1998 8. Hampstead Garden Suburb, 1968 9. Hampstead Village (Heath Passage), 1994 10. Mill Hill, 1968 11. Monken Hadley, 1968 12. Moss Hall Crescent, 1974 13. Totteridge, 1968 14. Watling Estate, Burnt Oak, 1998 15. Wood Street, Barnet, 1969 16. Glenhill Close, Finchley, 2001
Locally Listed Buildings	1,221

Policy CDH08 Barnet's Heritage

The Council will ensure that Barnet's heritage assets (designated and non-designated), including its conservation areas, statutory listed buildings, scheduled monuments, registered historic parks and gardens, archaeological remains, locally listed buildings and registered historic battlefield are conserved and enhanced in a manner appropriate to their significance. These assets are an irreplaceable resource which greatly contribute to the Borough's distinctive character and should continue to be enjoyed by present and future generations.

Designated Heritage Assets

Great weight will be placed on the conservation of the Borough's designated heritage assets, including listed buildings and conservation areas, when considering the impact of development proposals. Any harm to, or loss of, the designated heritage asset will require clear and convincing justification. Substantial harm to, or loss of, designated heritage assets will not be permitted unless it can be demonstrated that substantial public benefits will be achieved that outweigh such harm or loss.

Where less than substantial harm will result from a development proposal, this harm will need to be balanced against any public benefits that emanate from the proposal.

Conservation Areas

The Council will seek to preserve or enhance the character and appearance of its conservation areas when assessing development proposals. Conservation area character appraisals and where applicable, conservation area-based design guidance will be used in the assessment of planning applications.

The following criteria will be applied:

- i) the loss or substantial demolition of, a building that makes a positive contribution to the character or appearance of a conservation area, including a locally listed building, will be resisted.
- ii) the impact of development outside a conservation area, but which has a harmful impact on its character or appearance, including its setting, will be resisted.
- iii) the impact of development on trees, landscaping and open space, including gardens, that contributes to the character or appearance of a conservation area will be opposed
- iv) proposals should have regard to the local historic context and character
- v)
- vi) proposals should retain architectural detailing, traditional features, including shopfronts, which contribute positively to the appearance of a building or an area
- vii) in exceptional circumstances, where the loss of any heritage asset is permitted, the Council will require the submission of a contract of works to ensure the new development will proceed immediately after the loss has occurred

Statutory Listed Buildings

The conservation of Barnet's statutory listed buildings will be given a high priority of importance when assessing applications. Any harm to, or loss of, the significance of listed buildings will require clear and convincing justification.

The following criteria will be applied:

- i) Resist any harm to, or loss of significance, from whole or partial demolition, extension or alteration
- ii) Resist harmful alterations to the interior or exterior, or changes to curtilage features
- iii) Resist extensions or additions that are inappropriate in design, scale or material
- iii) Resist any harm to, or loss of, its significance, from development within its setting, including tall buildings³⁰

Registered Parks and Gardens

Development proposals within Registered Parks and Gardens should respect their special historic character and aesthetic qualities, whilst avoiding any adverse impact on their setting or on key views within or outside the designated sites. Any harm to, or loss of, their significance, from alterations, destruction, or from development within its setting, should require clear and convincing justification. Substantial harm to Grade II Registered Parks or Gardens should be exceptional, and wholly exceptional for grade II* Registered Parks or Gardens.

Registered Historic Battlefield

The site of the Battle of Barnet (1471) is of great historical importance and will be protected from development, both above and below ground, that would result in harm to its significance.

Archaeology

Archaeological remains will be protected, particularly in the identified Local Areas of Special Significance, by requiring that acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where considered appropriate. Development which impacts substantially on archaeological assets of national importance will be resisted.

Scheduled monuments and other undesignated assets which are demonstrably of national archaeological importance, which hold, or potentially hold, evidence of past human activity, should be preserved in situ. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to consult with GLAAS and if appropriate HADAS and submit an appropriate desk-based assessment together with, where necessary, a field evaluation.

Locally Listed Buildings and Other Non-Designated Heritage Assets

The Council will protect Locally Listed Buildings and their settings in accordance with their significance. There is a presumption in favour of their

retention and their loss will be normally be resisted. Development proposals, including external alterations and extensions should conserve, reveal and enhance the significance of these non-designated heritage assets and their settings.

Non-Designated Heritage Assets

When assessing the impact of a proposal on a non-designated heritage asset, the effect on its significance will be taken into account when determining the application. A balanced judgement will be required, having regard to the scale of any harm or loss and any public benefits that might result.

The Council may identify any potential non-designated heritage asset as a consideration of development proposals.

Heritage at Risk

The Council will work with Historic England, asset owners, developers and other stakeholders to find solutions to buildings, sites and places on the Heritage at Risk Register.

Archaeological Interest

The Council will protect remains of archaeological importance in accordance with their significance. Assets of national archaeological importance should be preserved in-situ. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to consult with GLAAS and if appropriate HADAS and submit an appropriate desk-based assessment and, where necessary, a field evaluation.

6.34 Advertisements

6.34.1 Advertising can have an adverse impact on the appearance of an area, particularly if poorly sited and designed. The amenity impacts and safety implications of all advertisements will be carefully considered. Permission will not be given for proposals which detract from the character of a building or street and impact on public as well as highway safety.

6.34.2 In areas of the Borough which are particularly sensitive, such as Conservation Areas and areas of open land, special care is needed to ensure that advertisements and signs do not detract from the character and appearance of the area.

- 6.34.3 The Council must manage advertisements effectively in terms of number, size, siting and illumination, as key considerations to ensure that they do not have substantial detrimental impact on the public safety, character and amenity of the surrounding area and residents. Advertisements and signs should be designed to be complementary to and preserve the character of the host building and local area. Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment.
- 6.34.4 The Council will resist advertisements where they contribute to or constitute clutter or an unsightly proliferation of signage in the area. The Council aims to reduce visual street clutter, reducing the number of objects on the street, rationalising their location and limiting the palette of materials. Free standing signs and signs on street furniture will not normally be accepted where they contribute to visual and physical clutter and create a hindrance to movement along the pavement or pedestrian footway. Street furniture includes objects placed on the street including traffic signs and signals, benches, street names, CCTV cameras, lighting, cycle parking, guardrails, bollards and bus shelters. Shopfront advertisements will generally only be acceptable at the ground floor level, at fascia level or below. Advertisements above fascia level can appear visually obtrusive and unattractive and, where illuminated, they can cause light pollution to neighbouring residential properties.
- 6.34.5 Any advertisements on or near a listed building or in a conservation area requires particularly detailed consideration given the sensitivity and historic nature of these areas and buildings and must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.
- 6.34.6 The Council's Advertising Policy 2019 provides clarity on future proposals in regard to advertising on Council land, including the criteria to be applied when granting consent for advertising on highway land. Advertisements must also be kept clean and tidy and remain in a safe condition that will not obscure or hinder the interpretation of official signage. A certain number and size of estate agent boards can be erected on properties without the benefit of advertisement consent. Areas may be exempted from this deemed consent under Regulation 7 of the 1992 Regulations. In these areas no boards will be granted advertisement consent by the Council because of their effect on visual amenity, except in exceptional circumstances.
- 6.34.7 Policy CDH09 applies to all advertisements requiring advertisement consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Information on what type of advertisement requires consent is set out in in Outdoor advertisements and signs: a guide for advertisers (Communities and Local Government, June 2007). Advertisements are only controlled in respect to their effect on amenity and public safety. Further guidance on the Council's approach to advertisements will be set out in Sustainable Design Guidance SPD.

Policy CDH09 Advertisements

The Council will support advertisements that:

- a) Do not cause unacceptable harm to the character and amenity of the area or public safety and are sensitively designed and located in the street-scene and wider townscape;
- b) preserve or enhance heritage assets and conservation areas;
- c) do not contribute to an unsightly proliferation of signage in the area; or
- d) do not contribute to street clutter in the public realm.
- e) Are of an appropriate size and siting that does not:
 - i) Significantly detract from the amenity of the street scene or neighbouring properties.
 - ii) Cause a physical or visual obstruction, including light pollution from flashing or illumination to passers-by, nearby residential properties or wildlife habitats.

The Council will resist advertisements on shopfronts that are above fascia level or ground floor level, except in exceptional circumstances.

7 Chapter 7 - Town Centres

7.1 National and London Plan Policy Context

7.1.1 Specific National and London Plan Policies to be taken into account:

NPPF

Section 7 Ensuring the vitality of town centres specifically paras 85, 86, 87, 88, 89, 90.

London Plan

Policy GG3 Creating a healthy city

Policy GG5 Growing a good economy

Policy SD6 Town centres and high streets

Policy SD7 Town centres: development principles and Development Plan Documents

Policy SD8 Town centre network

Policy SD9 Town centres: Local partnerships and implementation

Policy SD10 Strategic and local regeneration

Policy D12 Fire Safety

Policy D13 Agent of Change

Policy D14 Noise

Policy HC5 Supporting London's culture and creative industries

Policy HC6 Supporting the night-time economy

Policy E1 Offices

Policy E2 Providing suitable business space

Policy E3 Affordable workspace

Policy E4 Land for industry, logistics and services to support London's economic function

Policy E6 Locally significant industrial sites

Policy E7 Intensification, co-location, and substitution

Policy E8 Sector growth opportunities and clusters

Policy E9 Retail, markets and hot food takeaways

Policy E10 Visitor infrastructure

Policy E11 Skills and opportunities for all

Mayor of London Culture and Night-time Economy SPG

Mayor of London Town Centres SPG

7.2 Introduction

7.2.1 Barnet's suburban town centres are the economic, civic, retail, leisure and transport hubs of the Borough and a good indicator of its economic, environmental and social health. For the Borough to grow successfully it is important that we sustain thriving town centres. Each town centre has a special character that contributes to the distinctiveness of the Borough and it is important that this character is retained and enhanced.

7.2.2 Barnet's town centre hierarchy consists of one Major Centre, 14 District Centres, 16 Local Centres (including Colindale Gardens) and a Regional Shopping Centre (with the future potential designation as a Metropolitan Centre) at Brent Cross. In addition to this, there are seven out of town retail parks, over 50 local parades and several weekly markets in the Borough. Details of the town centre hierarchy are set out at Table 13.

- 7.2.3 The diversity of Barnet's town centres is one of its strongest attributes. This should be capitalised upon in order to help fulfil growth opportunities and deliver the goods and services, employment and leisure opportunities that local communities require. Town centre development should deliver on the Council's guiding principles for growth and be underpinned by the Good Growth policies of the London Plan. This will help deliver thriving town centres as well as building strong and inclusive communities, making best use of land, creating a healthy city and growing a good economy. Mixed-use development that can reduce the need to travel and provide a range of housing and employment opportunities together with retail and leisure space which will help create more sustainable and successful places.
- 7.2.4 Planning policies must ensure that town centres can adapt in a changing and challenging commercial environment, helping them to move away from the traditional physical shop format to provide a wider range of mixed uses and innovative spaces. Having a less restrictive framework that enables innovation is key to delivering thriving town centres and ensuring they maintain commercial, community and cultural functions. To succeed town centres will need to become more diverse places that people increasingly visit for a variety of reasons, such as leisure and community infrastructure and not just purely shopping. There is also a vital opportunity for town centres to reinvent themselves and improve their visitor economy, making better links to local character, understanding priorities for the community, helping to provide a unique identity and potentially develop a specialist offer.
- 7.2.5 A significant contribution to removing planning restrictions in town centres was the Government's radical overhaul in September 2020 of the Use Classes Order. The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (2020 No. 757). seek to 'amend and simplify' the system of use classes in England by creating a new broad Class E. 'Commercial, Business and Service' use class which incorporates:
- Retail/Shops (previously A1) (However small shops (of 280m² or less) that are important to the local community by virtue of being at least 1km from a similar shop have been placed into Use Class F2)
 - Financial and professional services (previously A2)
 - Restaurants and cafes (previously A3)
 - Offices (previously B1)

- 7.2.6 Along with other uses previously in Class D1 (non-residential institutions - gyms, nurseries and health centres) and D2 (assembly and leisure) and other uses which are 'suitable for a town centre area' are also included in the class:
- Indoors sport, recreation and fitness facilities
 - Medical and health facilities
 - Creches and day nurseries
 - Research and development facilities
 - Light industrial uses (which can be carried out in any residential area)
- 7.2.7 The impact of the Government's changes to the Use Classes Order in 2020 and subsequent expansion of permitted development rights in 2021 have been difficult to quantify for this Local Plan but one immediate impact has been the removal of strategic growth targets for comparison and convenience retail space.
- 7.2.8 Planning permission is no longer required to move between retail, professional services, restaurants/cafes, offices (including research and development facilities and light industrial uses), clinics, health centres, creches, day nurseries, day centres, gyms, and most indoor recreation facilities. Previously these were all separate use classes but now all fall within the new Class E therefore allowing flexibility for change, particularly on the high street and within local centres. There are also increased opportunities for conversion of Class E floorspace to residential through new permitted development rights introduced in 2021. In response to these changes the Council will focus on non planning interventions to manage and shape town centres. The Local Plan will continue to provide the foundations for growth and ensure that the core functions of our town centres in terms of Commercial, Business and Service uses are safeguarded. In addition, the Council will use its planning powers (through use of planning conditions) to manage non-retail commercial uses (within Use Class E) particularly within core areas of the town centre.

Table 13: Barnet's Town Centre Hierarchy

Brent Cross Shopping Centre	Regional Shopping Centre in 2016 London Plan. The future potential network classification for Brent Cross is as a Metropolitan Centre in the London Plan 2021	
Major Town Centre	1. Edgware	
District Town Centres	1. Brent Street 2. Burnt Oak 3. Cricklewood 4. Chipping Barnet 5. Colindale - the Hyde 6. East Finchley 7. Finchley Central	8. Golders Green 9. Hendon 10. Mill Hill 11. New Barnet 12. North Finchley 13. Temple Fortune 14. Whetstone
Local / Neighbourhood Centres	1. Apex Corner 2. Childs Hill 3. Colindale Gardens 4. Colney Hatch Lane 5. Deansbrook Road 6. East Barnet Village 7. Friern Barnet 8. Golders Green Road 9. Grahame Park	9. Great North Road 10. Hale Lane 11. Hampden Square 12. Holders Hill Circus 13. Market Place 14. New Southgate 15. West Hendon

7.3 Barnet's Town Centres

7.3.1 Significant residential growth in town centres will boost footfall and enable the Council to further support local business and encourage residents to shop locally. In helping Barnet's town centres to respond to a combination of tough economic conditions and changing consumer habits there is a need to diversify so that such locations become recognised social and community hubs as well as economic centres supported by new housing development. The Council is working with local partners including town teams to better define and build upon town centre identities and their distinctive qualities. This means getting the basics right with more support for improved health and well-being, promotion of active travel, and improved safety, whilst also taking a more visible and coordinated approach to addressing issues such as planning enforcement, anti-social behaviour, licensing, street cleansing, waste collection and parking. This will also improve movement by creating places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards. Significant residential growth in town centres will boost footfall and enable the Council to fund infrastructure improvements, public realm strategies, direct inward investment, support local business and encourage residents to shop locally, particularly within their 15 minute neighbourhoods.

- 7.3.2 The Council will ensure that there are a range of entry points to enterprise and employment in town centres. It will seek to concentrate a mix of commercial, community and other activity within town centres including greater variety in the typology of workspace provision in developments across Barnet's town centres including use class E. Further details are set out in the Economy Chapter.
- 7.3.3 In order to create the right environment to attract private sector investment and facilitate growth in Barnet's town centres, the Council has produced a number of non-statutory documents such as development frameworks (planning based) or strategies (environment (such as public realm) or regeneration related but non-planning) for a number of town centres i.e. Burnt Oak, Edgware, Chipping Barnet, Finchley Central, New Barnet and Golders Green together with Supplementary Planning Documents (SPD) for North Finchley and Edgware. Where such strategies and plans have been adopted for a specific town centre the Council will consider them as a material consideration in determining planning applications.
- 7.3.4 Areas with complex land ownership patterns, such as town centres, can benefit from the Council actively identifying development opportunities to ensure regeneration gets underway, including the use of available powers where required. Town Centre Frameworks can perform this function, identifying a range of opportunities from development sites to public realm enhancement whilst seeking to improve accessibility for all users and support the provision of a wide range of shops and services to meet the needs of a diverse local population. All frameworks, plans and strategies for individual town centres should be subject to a process of community engagement in order to identify the different requirements of each town centre, reflecting their distinctiveness and understanding the different needs and preferences of those who use them.
- 7.3.5 Each Framework includes a section on delivery and implementation, which proposes the use of Section 106 and Community Infrastructure Levy contributions to invest in a public realm enhancement programme with the potential to gain additional funding from other sources including government funds, local traders and community fundraising initiatives. Through this programme of town centre strategies, SPDs, planning briefs and development frameworks the Council will continue to develop and update frameworks for Barnet's town centres.

7.4 **Town Centres Evidence Base**

Town Centre Floorspace Needs Assessment 2017

- 7.4.1 The Town Centre Floorspace Needs Assessment (TCFNA) was produced on the basis of the pre-2020 Use Classes Order. This considered demand for another 77,000 m² of (Use Class A1-retail) comparison floorspace up to 2036 . A1 has also been subsumed with A2 and A3 uses within new Use Class E. The TCFNA also considered demand for up to 33,330 m² of food and drink uses, the majority of which (as restaurants and cafes) now sits within new Use Class E. As the retail market experiences significant structural and conceptual change there is a need for town centres to diversify in terms of other retail uses such as food and drink, becoming social and community hubs as well as economic centres supported by new housing development.
- 7.4.2 The TCFNA provides an overview of the health of the town centre network before the arrival of COVID19 in 2020. The Study highlighted that:
- There is scope for further improvement of Barnet's town centres in both quantitative and qualitative terms. *This remains a post COVID19 priority.*
 - All town centres could benefit from improvement to the leisure offer. *Improving the offer of town centres to their neighbourhoods and being accessible by walking and cycling is an increased priority*
 - Colindale, The Hyde is a District Centre performing more like a Local Centre. *The immediate impact of COVID19 on all town centres is being monitored.*
 - Clustering of uses for gambling, betting, payday loan shops, hot food take-away bars have negative health implications for users. *This still remains an issue of concern in Barnet's town centres*
 - Growing number of service sector units (e.g. hairdressers, nail bars), accounting for almost half of total retail unit provision in Local Centres. *The immediate impact of COVID19 on all town centres is being monitored.*
 - Opportunities to promote digital technologies in town centres to future-proof them against declining footfalls. *There is a more urgent need for digital high streets to enable town centres to respond to online retail and improve the attractiveness of their offer*
 - Landlords are focusing on improving the quality of existing retail parks through refurbishment and the introduction of a greater range of uses, including leisure and night-time economy. Retail unit floorplates in town centres are generally more constrained. *The response of landlords to the overhaul of the Use Classes Order in 2020 and the replacement of the A1 – shops Use Class by the wider Use Class E – Commercial, Business and Service is still being assessed.*
 - Food and drink uses account for approximately 77% of total leisure spending growth in Barnet with North Finchley, Whetstone and Edgware highlighted as the town centres most likely to experience the most significant levels of food and drink expenditure growth if spending patterns return to pre COVID19 trends.

- Pre COVID19 spending on recreational and sporting services was estimated to account for 12% of total leisure spending growth in Barnet. The town centres of Cricklewood, North Finchley and Golders Green were forecast to experience the most significant levels of recreational and health and fitness expenditure growth based on those pre COVID19 spending patterns.
- Barnet has three cinemas with a total of 14 screens. With most of the screens in the east of the Borough Barnet prior to COVID19 experienced a high level of expenditure leakage (57%) amongst cinema goers. The cinema screen capacity assessment highlights capacity to support an additional 14 screens up to 2036 in Barnet, equivalent to one large multiplex cinema or up to five boutique cinemas.
- The proposed multiplex at Brent Cross will account for a significant element of the indicated capacity, however there may also be potential for localised boutique style cinemas in larger town centres. *Further evidence is required on the revival of cinema following the COVID19 pandemic.*

7.4.3 The Covid-19 pandemic has accelerated movement away from traditional retail formats and further changed the way we shop and interact with town centres as the focus of local commercial activity. Through working with our partners in the WLA the Council will seek a better understanding of what format and quantum – if any – of additional space we may need in terms of retail provision.

7.5 Brent Cross

7.5.1 Brent Cross Shopping Centre is Barnet's largest shopping location and forms part of the Brent Cross Growth Area, an area which is set to be transformed over the lifetime of the Local Plan. Outline planning permission was granted in 2010 for the comprehensive redevelopment of the whole of the Brent Cross Growth Area to create a new mixed use town centre with 56,600m² of comparison retail floorspace; 7,500 new homes, including affordable ones, a new commercial quarter with a forecast of over 20,000 new jobs. Implementation of the consent will deliver a major retail and leisure destination for North London with a range of uses contributing to the night-time economy.

7.5.2 The Brent Cross regeneration is a large and complex scheme that will take over 20 years to deliver and will need to deal with changes in economic and market conditions over this time. A policy framework is set out at GSS02 for the Brent Cross Growth Area that enables the Council to respond to change in the long-term.

7.6 Vibrant Town Centres

- 7.6.1 The NPPF defines main town centre uses, which includes retail, leisure, entertainment and more intensive sport and recreation uses (such as cinema, restaurants and nightclubs), offices, arts, culture and tourism development. Barnet's town centres will continue to be the focus for convenience and new comparison retail development. They will also accommodate other appropriate town centre uses including community and civic facilities. Residential accommodation within mixed use development in town centres can help contribute to vitality and viability by increasing footfall for business, supporting the night-time economy and enhancing levels of natural surveillance and activity. This brings in new residents who if living above ground floor level, enable more efficient use of the opportunities offered by town centres.
- 7.6.2 A range of uses are important to the continued vitality and viability of the town centre. Housing within mixed-use areas of development can reduce the need to travel, reducing congestion and helping to improve air and noise quality. By enhancing the provision of arts, culture, leisure and recreation facilities the Council wants to diversify the town centre offer, making them more attractive family friendly destinations, places which feel safe, generate more footfall and encourage longer visits. Good design and effective use of space can also enhance footfall and the time people may spend in the centre through reconfiguration of landscaping and public realm as well as integrated access to shared outdoor spaces. Good public realm should be uncluttered so that all pedestrians including those that are mobility impaired can use pavements. Town centre public realm strategies will address in more detail the management of obstacles such as: shops which use pavements for displaying goods; advertisement hoardings; and telephone kiosks.
- 7.6.3 Employment is critical to the vitality of town centres, and the Council will support viable employment opportunities to sustain activity and encourage growth including greater variety in the typology of workspace provision (see Policy ECY01).
- 7.6.4 Tourism and visitor facilities can also help create jobs and support the local economy. In determining the location of tourist and visitor accommodation within the Borough, the Council considers town centres to offer the most sustainable locations, particularly when supported by good public transport access to central London and major transport hubs.
- 7.6.5 The Council will also support community uses in the town centres (including local centres), as these locations are associated with higher levels of public transport accessibility. Enhancement or relocation of community uses is supported by the Council on the basis that this does not reduce service coverage in other parts of the Borough. Policy CHW01 provides further detail on community uses. This approach will deliver community uses and support the wider vitality and viability of the town centre particularly through the maintenance of an active street frontage.

- 7.6.6 Small community shops of no more than 280m² are set to take on greater importance within suburban Barnet as the retail market changes. The 2020 Use Classes Order through Use Class F2 provides greater protection for such facilities when they are more than 1km from a similar shop. Proposals that involve the loss of such facilities will be required to provide a robust justification that similar shops are within a 1km walking distance.
- 7.6.7 Outside of town centres all proposals for main town centre uses, including all retail, office or leisure development, which are outside of town centres must comply with the sequential test approach as set out in the NPPF (para 86).
- 7.6.8 Enabling opportunities and directing investment that contributes to thriving town centres is a priority for the Council. Proposals for significant retail, office or leisure development (of more than 500m² gross internal floorspace) outside of Barnet's town centres will require an impact assessment demonstrating that there would be no adverse impact on the vitality and viability of the designated centre. The Council will refuse planning permission where there is evidence that proposals are likely to have significant adverse impacts on the vitality and viability of the designated centres.

Policy TOW01 Vibrant Town Centres

The Council will promote the vitality and viability of the Borough's town centres by managing a strong hierarchy of town centres as the priority location for commercial, business and service uses.

The Council will work with local partners to better define and enhance the distinctive character of individual town centres including improvements outlined in public realm strategies and through taking a more visible and co-ordinated approach to address a range of uses including anti- social behaviour, car parking, street cleaning and licensing.

- (a) The Council will support an appropriate mix of uses within designated centres:
- i) Brent Cross (see policy GSS02) to provide a strong retail offer as well as a wider mix of uses including leisure, office and other commercial, community and cultural uses to create a new Metropolitan Town Centre for North London.
 - ii) Edgware (see policy GSS05) where regeneration will consolidate the quantum of retail floorspace alongside improvements to the quality of the retail and leisure offer, whilst providing a range of community uses. New housing will also form a key part of significant growth of the local economy.
 - iii) Cricklewood (see policy GSS04) where regeneration will support the improvement of the retail offer alongside new housing, community and leisure facilities.
 - iv) District Town Centres (see Policy GSS08) which will be promoted to provide a network of complementary retail, leisure and community uses as well as new housing development.

- v) Local Centres (including new provision at Colindale Gardens) which will be promoted to provide a local level of retail and community uses and smaller scale residential led mixed use development.
- (b) Outside of the town centres local parades will be enhanced and protected with strong safeguarding for local community shops (that meet the criteria of Use Class F2) Proposals that involve the loss of such facilities will be required to provide a robust justification that similar shops are within a 1km walking distance.
- (c) In order to reduce car trips the Council supports the relocation and expansion of leisure uses from lower PTAL car dependent locations to town centre locations where opportunities arise.
- (d) Following a 'town centres first approach', the sequential test will be applied to ensure sustainable patterns of development are achieved; therefore, outside of town centres any development of main town centre uses will not be permitted unless it can be demonstrated through the NPPF sequential approach that there are no suitable premises/sites available in the designated centres as set out in Table 13 and that there would be no harm to the vitality and viability of these centres by the approval of edge-of centre and out of centre development. In addition, any proposal of more than 500 m² of retail, office or leisure development in an edge or out of centre location must be supported by an impact assessment.
- (e) The Council will apply the Agent of Change principle in order to protect residential amenity from new development and also to protect existing businesses from residential development introduced nearby.

7.7 Development Principles for Town Centres

- 7.7.1 An appropriate mix of uses and services is needed in order to retain and improve the vibrancy and vitality of Barnet's town centres. The core area of the town centre should be maintained for commercial, business and service uses of which retail shops remain the priority use within the primary frontages. Elsewhere, in the town centres a greater diversity of uses will be supported, recognising the changing role of these locations as places that people visit for a variety of reasons, including shopping, working, leisure and community purposes as well as museums and hotels.
- 7.7.2 Digital technologies facilitating online sales have altered the ways in which retailers utilise physical floorspace. Multi-channel retailing includes a digital online retail presence complemented by physical stores located in a range of accessible and attractive locations. Digital technology can help to drive footfall and in-store purchases and the Council will be supportive of innovative approaches to fulfilment of customer orders and other retail needs within Barnet's town centres.
- 7.7.3 Local centres and neighbourhood parades are particularly important for less mobile residents including older people, parents with young children, people who are mobility impaired and residents without access to a car. Protecting retail uses from change in local centres is the priority. Such provision contributes to '15 minute neighbourhoods'. Loss of retail as part of Commercial, Business and Service uses to another Use Class or sui generis use will generally be resisted. As well as providing for local needs shops in the local centres and parades can provide specialist uses which may not be found in the larger town centres. Not all uses will be appropriate as an active frontage will need to be maintained to ensure the continuity of the frontage and vibrancy in the local centre or parade. For smaller parades, proposals will need to demonstrate that adequate provision of local shops and services is maintained to justify moving to a use outside Use Class E.
- 7.7.4 At the other end of the scale markets continue to contribute to a dynamic, competitive and diverse retail sector within Barnet. They can also provide greater retail choice and affordability as well as help to meet the needs of Barnet's diverse communities. Markets are a key generator of footfall as well as a known attractor to centres. Burnt Oak, Chipping Barnet and North Finchley are locations associated with markets. There are also a number of occasional farmers' and other specialist markets within the larger district centres generating additional activity and associated spend.
- 7.7.5 There is a great opportunity for Barnet to contribute to London's economy with the provision of a dynamic range of town centres that can serve changing needs of residents and the local economy. New developments must be appropriate to the scale, character and function of the town centre, in keeping with its role and function within Barnet's town centre hierarchy. In most town centre locations higher density development will be expected in order to take advantage of these more accessible locations.

7.7.6 Town centre development will be expected to enhance the public realm in order to improve accessibility, social spaces, safety and the environment. In making high streets healthier opportunities to reduce reliance on car travel should be encouraged, including the creation of attractive and welcoming places that enable well connected walking and cycling routes. In considering development proposals opportunities to reduce on-street and off-street car parking should be pursued in accordance with Policy TRC03 whilst acknowledging the contribution of appropriate car-parking facilities to the success of a town centre

Policy TOW02 Development Principles in Barnet's Town Centres, Local Centres and Parades

The Council expects a suitable mix of appropriate uses to respond to changing demands and support and boost their continued vitality and viability.

Any significant new development will be expected to provide a mix of unit sizes, avoid an inward looking layout, maintain the street frontage and provide suitable and convenient linkages for shoppers to access other town centre uses.

The Council will seek to ensure that

- (a) Within the primary frontages of Major and District Town Centre, Local Centres and Parades the retail function is safeguarded as part of the Commercial, Business and Service Use Class. Any proposals that reduce Commercial, Business and Service Use floorspace will only be supported if criteria (b) is met.
- (b) Where proposals for alternative uses at ground floor level do not meet criteria (a) the Council will take the following into consideration:
- (c) Significance of reduction of retail facilities.
- (d) Loss of active frontage at ground floor level.
- (e) Whether alternative retail facilities are accessible by walking, cycling or public transport to meet the needs of the area.
- (f) Capability of the proposal in attracting visitors to the town centre.
- (g) Contribution of the proposal to the Council's growth objectives.
- (h) Evidence that there is no viable demand for continued existing Use Class E use and that the property has been vacant for over 12 months, with the exception of meanwhile uses in accordance with part n). Evidence of continuous marketing over a 12 month period will be required.
- (i) Properties at ground floor level are expected to retain active frontages.
- (j) The use of upper floors for alternative uses including residential, employment or community provision will be strongly encouraged.
- (k) In accordance with the Agent of Change principle development that has significant adverse impact on the amenities of nearby occupiers will be resisted.
- (l) Development that has significant adverse impact on traffic flow or road safety will be resisted.
- (m) The use of vacant sites or buildings for occupation by meanwhile uses that will benefit a town centre's viability and vitality will be supported.
- (n) Markets in town centres will normally be supported, in particular where they contribute to greater retail choice, affordability and support for small enterprises.

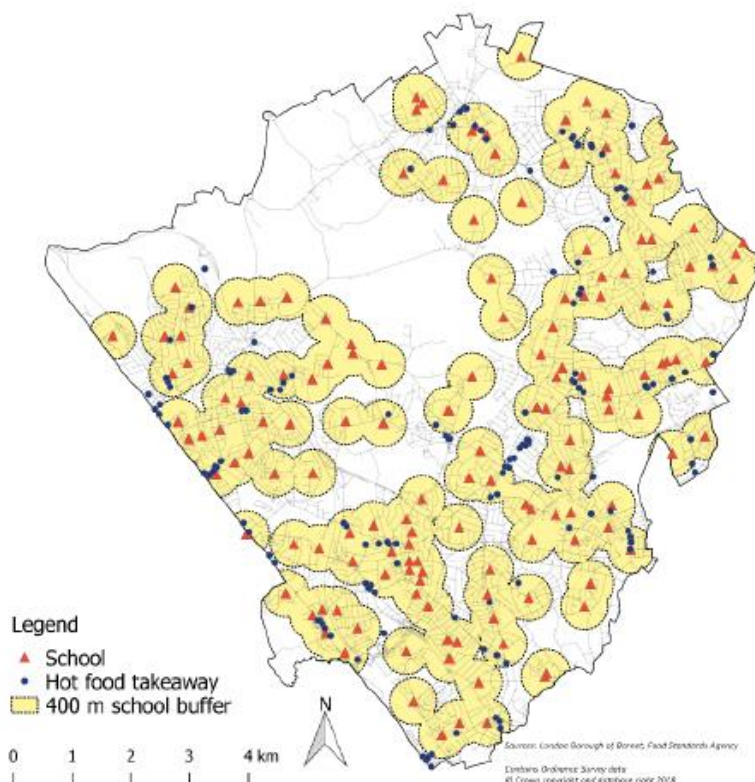
7.8 **Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars.**

7.8.1 The Council through this Local Plan supports a successful, competitive and diverse retail sector in the Borough with sustainable access to goods and services particularly within town centres. In supporting this sector, whilst also ensuring access to other commercial, business and service uses there is a need to manage the clustering of specific uses. It is acknowledged that clustered related uses can help town centres develop specialist or niche roles that can attract footfall and spend; however, over-concentration of uses such as adult gaming centres, amusement arcades, betting shops, payday loan shops, hot food takeaways and shisha bars can have a detrimental impact on physical and mental wellbeing as well as on the vitality and viability of town centres. The impact of such uses in terms of associations with unacceptable levels of noise, vibrations, odours, traffic disturbance, litter and anti-social behaviour is reflected in their classification as 'sui generis' in the Planning Use Classes Order. The proliferation of such 'sui generis' uses can quickly change the character of a town centre.

7.8.2 Obesity is one of the greatest health challenges facing London where 38 per cent of Year 6 pupils (10 to 11 year-olds) are overweight or obese – higher than any other region in England. The creation of a healthy food environment, including access to fresh food, is therefore important. The causes of obesity and poor health are multi-faceted and complex. National guidance is clear that planning policies can limit the proliferation of certain use classes including 'sui generis' uses in certain areas, and that regard should be had to locations where children and young people congregate.³¹ London Plan (Policy E9 Retail, markets and hot food takeaways) supports restricting proposals for hot food takeaway uses that are within 400 metres of a school. It also supports the use of thresholds to manage an over-concentration of Hot food takeaway uses within town centres. While it is acknowledged that takeaways provide a convenience service to local communities which has proved popular at the time of the COVID-19 pandemic, the Council needs to balance this with concerns about levels of childhood obesity and increasing levels of health inequality as well as the need to preserve the retail-based role of town centres. The Council's Public Health team have produced evidence on the proliferation of hot food takeaways in the Borough including a map of hot food takeaways and schools – see Map 6.32 In addressing concerns about childhood obesity the Review focused on students attending Barnet schools. At the time of the Review there were at least 205 hot food takeaways in Barnet according to the Food Standards Agency. This figure is however considered an under-estimate as according to a University of Cambridge study there are 350 hot food takeaway premise in the Borough. Within this extensive base and responding to changes in consumer preferences for takeaway hot food there will be opportunities for turnover as takeaway businesses close and new ones replace them in premises established and allowed through the planning system.

7.8.3 The Council has established a scheme, known as the Healthier Catering Commitment, that helps existing food businesses in Barnet to provide healthier food, which is low in fat, salt and sugar, to their customers. In those instances where new hot food takeaway premises are allowed the Council will require, through a planning condition, that operators comply with the Healthier Catering Commitment.

Map 6 – Hot food takeaways and schools in Barnet



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7.8.4 The NPPF states that planning policy should take account of and support local strategies to improve health, social and cultural wellbeing. Barnet's Joint Health and Wellbeing Strategy 2021-2025: Creating a borough of health together! is committed to creating a healthier place with resilient communities. As well as hot food takeaways the over-concentration of other uses which are principally adult orientated such as adult gaming centres, amusement arcades, betting shops, pawnbrokers, pay-day loan stores and shisha bars can give rise to particular concerns regarding their impact on mental and physical health and wellbeing of users. This is in addition to impacts on the amenity, vitality, viability and distinctiveness of the locations in which they are based. The proliferation and concentration of this group of uses should be carefully managed through the planning system. This is in addition to the safeguards provided by the Council's Statement of Principles (Gambling Act 2005) 2019-2022 which prioritises for consideration issues around crime, noise and anti-social behaviour as well as proximity to sensitive locations in determining applications for permits and licences.

- 7.8.5 Since the introduction of the Smokefree Law in 2007, there has been a rise in shisha consumption in Barnet. Shisha smoking is associated with several types of cancer. Shisha bars can adversely impact the amenity of an area, particularly through late night noise and disturbance. The Council's Public Health Team have produced evidence on Shisha.³³ This highlighted that students attending schools with a shisha premise within a half mile radius being 2.5 times more likely to smoke shisha than those who did not. Out of 25 secondary schools in Barnet, 10 are within walking distance (400m) of shisha premises.
- 7.8.6 The Royal Society of Public Health's Report, "Health on the High Street: Running on Empty," identifies bookmakers and payday lenders as health hazards. At a national level, shops with Fixed Odds Bettering Terminals (FOBT) have been found to have a strong negative affect on mental health and the presence of bookmakers is directly correlated with a rise in crime. The Public Health Team are working to assess the local impact of such uses.
- 7.8.7 Policy TOW03 seeks to ensure that uses such as hot food takeaways, adult gaming centres, betting shops, pawnbrokers, pay-day loan stores and shisha bars do not form clusters, are not near to schools and other facilities that young people are more likely to attend (youth centres/scouts/community centres). As part of the Authorities Monitoring Report the Council will monitor the numbers of hot food takeaways, adult gaming centres, betting shops, pawnbrokers, pay-day loan stores and shisha bars within each town centre. The proliferation and concentration of these uses will be carefully managed through Policy TOW03.
- 7.8.8 In considering proposals for such uses the Council will require an assessment of development impacts which should be proportionate to the proposal. The Council may require the applicant to submit a rapid Health Impact Assessment (HIA) for those uses, particularly in geographical areas which exhibit poor economic and/or health indicators. The Council is producing Health Impact Guidance. This will include a checklist for undertaking HIA Screening and Appraisal

Policy TOW03 Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars

- a. In addressing increasing levels of childhood obesity and health inequality within the Borough as well as to preserve the retail-based role of Barnet's town centres the Council will resist the proliferation and over concentration of hot food takeaways and will not permit proposals that:
- i) Are not separated from any existing hot food takeaway unit or group of units in such a use³⁴.
 - ii) Are located within 400m of the boundary of an existing school or youth centre.
 - iii) Have an unacceptable impact on highway safety.

- iv) Have an undue impact on residential amenity in terms of noise, vibrations, odours, traffic disturbance and litter.
- v) Do not provide effective extraction of odours and cooking smells.
- vi) Do not provide adequate on-site waste storage and disposal of waste products.
- vii) Do not agree to operate in compliance with the Council's Healthier Catering Commitment.

b. In addressing increasing levels of health inequality within the Borough as well as to preserve the retail-based role of Barnet's town centres the Council will resist the proliferation and over concentration of: betting shops, adult gaming centres, amusement arcades, pawnbrokers, pay day loan shops and shisha bars will not permit proposals for such Sui Generis uses that:

- viii) Are not separated from any existing Sui Generis unit in this group by at least two units which are neither units (in uses as highlighted in (b)) nor hot food takeaway uses.
- ix) Are located within 400m of the boundary of an existing school or youth centre.
- x) Are not accompanied by Health Impact Assessments (HIAs) when requested by the Council.
- xi) Do not provide active frontages and must have a positive visual impact on the street scene.
- xii) Have a significant impact on local community and residential amenity in terms of noise, vibrations, odours, traffic disturbance and litter.

7.9 Night-Time Economy

- 7.9.1 The night-time economy refers to all economic activity taking place between the hours of 6pm and 6am and includes evening uses. Night time economy uses include restaurants bars, as well as cinemas, theatres and arts venues. Such uses can contribute positively to the vitality and vibrancy of town centres by providing informal surveillance for passers-by helping visitors to feel safer in the night-time. Patterns of consumer behaviour and technological change have led to the concept of a 24-hour city, which has led to diversification of use and adaptation for many areas that have brought new residents to the area.
- 7.9.2 The majority of Barnet's town centres have a night-time offer to varying degrees³⁵. The London Plan classifies Chipping Barnet, Cricklewood and North Finchley town centres as having night time economies of more than local significance. Town centres that provide a safe and attractive environment are more likely to encourage residents and visitors to come to the Borough in the evening. Public realm improvements will change the image and perception of Barnet's town centres and welcoming public spaces will encourage people to spend more time at the destination. The Council seeks to enhance the existing strengths of town centres to create a thriving night time economy with activities and venues that are fully inclusive and accessible. This includes reaching a balance between safeguarding amenity and maximising the creative potential from a growing leisure offer that enhances the range and quality of local food and drink, heritage, culture and arts on offer. Further guidance is set out in the Mayor's Supplementary Planning Guidance on Culture and the Night Time Economy.
- 7.9.3 Town centre strategies can help to manage the role of the night-time economy with regard to residential amenity and any potential adverse effects on local residents. In addition, night time economy uses and activities including drinking establishments are subject to a co-ordinated approach based on Planning and Licensing policy and considerations by other stakeholders such as Highways, Community Safety and Cleansing. Diversification of night-time uses can add to the vitality and viability of town centres and should promote inclusive access and safety. Where appropriate, planning conditions or legal agreements will be used to manage hours of operation, noise and fumes from machinery, storage and disposal of refuse, the areas used by customers and any other issues that may need to control the impact of night-time uses in order to protect amenity. The introduction of the 'agent of change' principle will ensure that new development does not unduly add to the costs and administrative burdens of existing businesses.

Policy TOW04 Night-Time Economy

The Council will support proposals for night-time economy uses in Barnet's Town Centres in particular Chipping Barnet, Cricklewood, North Finchley and Whetstone as well as Brent Cross, Edgware and Golders Green, where:

- a) The scale and type of use reflects the role and function of the centre.

- b) There is no conflict with Policy TOW03
- c) There is no significant negative impact on the amenity of adjoining or adjacent residential accommodation and non-residential uses, such as noise disturbance, cooking smells, anti-social behaviour, or highway safety.
- d) There is no significant negative impact resulting from cumulative development in relation to the number, capacity and location of other night-time economy uses in the area.
- e) There is no significant detrimental impact on the historic distinctiveness of Barnet's town centres.
- f) Development that preserves or enhances existing night time economy activities or creates new ones that will reinforce the role and significance of Chipping Barnet, Cricklewood, North Finchley and Whetstone as well as Brent Cross, Edgware and Golders Green in an inclusive and accessible way will be supported, whilst that which would undermine it will be refused.

8 Chapter 8 - Community Uses and promotion of health and wellbeing

8.1 National and London Plan Policy Context

8.1.1 Specific National and London Plan Policies to be taken into account.

NPPF

Section 8 Promoting healthy and safe communities specifically paras 91, 92, 93, 94, 94 and 95

London Plan

Policy GG1 Building Strong and Inclusive communities

Policy GG3 Creating a healthy city

Policy D11 Safety, security, and resilience to emergency

Policy H12 Supported and Specialised Accommodation

Policy H13 Specialist Older Persons Housing

Policy S1 Developing London's social infrastructure

Policy S2 Health and social care facilities

Policy S3 Education and childcare facilities

Policy S4 Play and informal educational facilities

Policy S5 Sports and recreation facilities

Policy S6 Public toilets

Policy S7 Burial space

Policy HC7 Protecting public houses

Mayor of London Culture and Night-time Economy SPG

Mayor of London Social Infrastructure SPG

8.2 Introduction

8.2.1 Community uses cover a range of uses from health facilities, educational institutions and community meeting places to public houses, libraries and theatres. Community access to these uses has been impacted by COVID-19 which has already had disproportionate impacts upon young people and other vulnerable and disadvantaged groups. Within Barnet there is a need for a range of community facilities to support the diverse requirements of the Borough's population. Barnet's demographic structure will change during the lifetime of the Local Plan and there is a need to protect and make better use of existing community uses in order to be able to respond to population change.

8.2.2 The Council's approach is to encourage new community uses to be located in town centres and local centres as these locations tend to be more accessible by public transport, in particular the bus network. Where facilities are being provided that serve a local catchment, proximity to the bus network will be considered to be of particular importance. Where possible, deployment for COVID-19 testing or vaccination should be considered in case of surge outbreaks.

- 8.2.3 Understanding Barnet's population composition and its needs is the first step to being able to improve health and wellbeing and promote choices for individuals to lead healthy lives. This is a cross cutting theme for the Local Plan. Recognising that growth in the Borough will be disproportionate, with an increasing proportion of residents being either young or older people, this Plan seeks to demonstrate that their needs will be met. The JSNA and the Joint Health and Wellbeing Strategy for Health and Social Care provides a strategic basis for how the Council can enable people to live healthy lifestyles while at the same time continue to promote independence, choice and control for vulnerable people and their carers.
- 8.2.4 Barnet's Infrastructure Delivery Plan (IDP) reviews the existing capacity of infrastructure provision and highlights needs, gaps and deficiencies in provision, together with the costs of updating and delivering new infrastructure such as educational and healthcare facilities, libraries, community centres and leisure centres. The IDP represents the Council's most recent assessment of infrastructure needs and is a live document which remains under constant review.

8.3 **Barnet's Community Infrastructure**

- 8.3.1 The Council has adopted a Community Asset Strategy, a Community Asset Implementation Plan and a Community Participation Strategy to aid in the management of its portfolio of community assets. These assets include sports facilities, playing fields, bowling greens, gyms and sports centres, and a variety of buildings including community halls, offices and nurseries. The Council's approach to managing community assets is to generate commercial yields, subsidise where appropriate when an organisation is supporting the Council's objectives or assisting with service delivery, maximise efficient use of buildings, identifying opportunities for organisations to share and co-locate. A key priority is to develop community hubs which will provide a facility that can be used by a variety of community groups.
- 8.3.2 For the foreseeable future, community facilities in Barnet are expected to experience increased levels of demand and rising expectations. The long-term sustainability of facilities is a particular concern if funding continues to decline. It is imperative that new community facilities are efficient, flexible and adaptable in their design ensuring that the management and use of such spaces remains affordable.
- 8.3.3 A key focus for managing Barnet's future growth will be ensuring that:
- the services, facilities and infrastructure to support the local community as well as visitors are provided in suitable locations to meet likely and potentially increasing demand;
 - all new community facilities are accessible to all and provide for physical and sensory accessibility requirements;
 - families with small children, older people and disabled people can move around, enjoy and feel secure within all neighbourhoods to enable full participation in and contribution to the life of the community;

- opportunities to deliver services in a new format, including web-based provision, are explored and maximised where possible; and
- through Lifetime Neighbourhoods, cohesive, successful and sustainable communities will be delivered. To succeed, this will involve putting people at the heart of the design process. Further details on inclusive design are set out in Chapter 6.

8.3.4 Multi-purpose community facilities that make efficient use of premises providing a range of services at one accessible and inclusive location will be supported. Where new development results in increased demand for community spaces, it will be expected to make commensurate provision for new, or improvements to existing facilities. It will be expected, as part of any planning obligation, that provision for the long-term management and maintenance of the facility is made by the developer.

8.3.5 Introducing a wider mix of uses on a community site or intensifying a community use or function is supported provided accessibility and the impact on residential amenity is addressed. If there are improvements to existing community or education uses, consideration should be given to how access to public transport can be improved. Adapting a building or land for another community use would be preferable to its loss. This could also be part of a mixed-use redevelopment which re-provides adequate facilities on site. As an alternative, improvements can be provided at another location and secured via a legal agreement.

8.4 **Barnet's Libraries**

8.4.1 Barnet's libraries act as a community hub providing access to meeting space and wireless connectivity as well as the Council and partner's services. The vision for Barnet libraries is to provide a 21st Century library service that is in tune with the changing lifestyles of Barnet's residents. Libraries are a universal and unique service, offering learning opportunities for all ages that can enhance and enrich the lives of residents across the Borough. Within Barnet the ambition for libraries is that they:

- Help all children in Barnet to have the best start in life, developing essential language, literacy and learning skills and a love of reading from an early age.
- Provide residents with life skills; to improve their health and wellbeing; and to get a job and progress whilst in work.
- Bring people together, acting as a focal point for communities and assisting resident groups to support their local area.

8.4.2 Barnet's library estate includes 14 library buildings and a mobile library. Reconfiguration of the library estate has helped release space for commercial and community letting and where possible, to co-locate services to make better use of library and other publicly owned buildings. Such proposals will reflect opportunities for improving access and modernising library space. In addition, there are also two community libraries in Barnet at Friern Barnet and the Garden Suburb Community Library.

8.5 Leisure Centres and Swimming Pools

- 8.5.1 In partnership with Greenwich Leisure Ltd the Council manages five leisure centres and pools within the Borough. In ensuring more efficient use of leisure facilities and greater footfall, co-location will be explored with other community provision on a site by site basis, as well as alternative provision in case of future restrictions due to COVID-19. In terms of the school estate the Council seeks to maximise use of school sport and leisure facilities by the wider community.
- 8.5.2 Analysis of current provision is set out in Barnet's Indoor Sport and Recreation Facilities Study 2018. The Study assessed current and future unmet need and access to public sector facilities and highlighted optimal locations to address projected unmet need in accordance with the Fit and Active Barnet Framework 2016-2021. The Study highlights that better access to physical activity at local level is important for residents, particularly those who are currently inactive, and those without access to private transport, to participate, and become physically active. Although the Borough has good sports facilities some will require replacement or refurbishment during the Plan period. Linking facility provision, informal and formal, to good levels of public transport access and opportunities for active travel, and informal use facilities will help to facilitate more active lifestyles for more people. There is also the issue of sports hall facilities that are not accessible to community use. The Council will therefore seek increased community access to new provision through planning agreements; this is highlighted as a priority in the Study.
- 8.5.3 Despite the development of new pools at Barnet Copthall and New Barnet leisure centres there is insufficient swimming pool provision to meet both current and future demand. Within the period covered by the Local Plan the Study has identified a need for increased pay-and-play accessible water space, equivalent to 2 new swimming pools (6 lane x 25 m). There is an opportunity to meet this demand through increased water space in replacements for the ageing facilities of Finchley Lido and Hendon Leisure Centre alongside potential new provision in the north west of the Borough. Other priorities highlighted include provision of indoor bowls, fitness facilities, gymnastics and trampolining.
- 8.5.4 By developing 'active environments' through urban design, understanding land use patterns, and creating transportation systems, active, healthier and more liveable communities can be created. A key conclusion of the Indoor Sport and Recreation Study in prioritising provision is the creation of more active environments, reflecting active travel, safe cycle routes to school, the need to link existing and new communities with walking / cycling / jogging routes.

8.6 Arts and Culture

- 8.6.1 Barnet's Arts and Culture Strategy 2018-2022 provides a framework to harness the vision, ambition and resources of the Council, its partners and individuals working in Barnet to promote a rich cultural life in the Borough. The Strategy identifies how arts and culture opportunities are at the heart of regeneration and sets out its priorities for promoting spaces and opportunities for creative and ambitious art projects to thrive and new cultural organisations and industries to flourish.
- 8.6.2 In order to contribute to the vitality and viability of town centres the Local Plan supports temporary (meanwhile) uses and the more flexible application of town centre policy in creating thriving places where people want to visit and where they feel safe to visit. Proposals that help celebrate the culture, history and archaeology of Barnet and contribute to the visitor economy will generally be supported. The contribution from the voluntary sector to promoting arts and culture within the Borough and their role in helping to rejuvenate Barnet's Town Centres is acknowledged.

8.7 Provision for Children and Young People

- 8.7.1 The Council co-ordinates in-year admissions for all schools, including the academies, and works closely with free school proposers and academies wanting to expand, to seek to ensure provision of high quality places in the areas of greatest need. The Education Strategy for Barnet 2021 – 2024 highlights that the Borough's educational offer lies at the heart of Barnet's continuing success as a desirable place where people want to live, work and study. Excellent educational outcomes and ensuring children and young people are successful in life and equipped to meet the needs of employers are vital to Barnet's future success. The School and Settings Improvement Strategy 2021 – 2024 sets out the priorities for ensuring that children and young people continue to benefit from an excellent, high quality education offer.
- 8.7.2 The school population is changing and although there has been a substantial investment programme to provide new school places, more will be required in response to the Borough's growth. Planning for any new provision will be closely linked to the distribution and delivery of housing growth as highlighted in the housing trajectory. Maintaining a balanced supply of school places is a complex task as trends in demand are driven by a range of variable factors, some of which are acutely sensitive to unforeseen changes at local, national and global level. These uncertainties include:
- the unprecedented disruption to the education system caused by COVID-19 and the uncertainty as to how the fallout will impact on future school place demand;
 - the ongoing uncertainty around Brexit and changing population, particularly as a result of recent changes in EU / Non-EU migration patterns and birth rates
 - large-scale regeneration across the Borough and unknown child yield from new housing developments;
 - the housing market volatility with the mini boom recently experienced as a result of Government initiatives;

- rising unemployment in Barnet;
- changes in parental perception and Ofsted ratings of Barnet schools; and the
- popularity of Barnet schools, place planning in neighbouring LAs and cross-border movement.

8.8 Primary

8.8.1 At primary level, the demand has continued to fall and almost all school planning areas currently have an overall surplus. This will continue to be monitored to ensure sufficient capacity remains within the schools across the Borough, with forecast demand for each pupil planning area continuing to be reported to the appropriate Council committee.

8.9 Secondary

8.9.1 Barnet's secondary schools are now experiencing the increase in rolls as the primary school bulge classes move through education system. The Council has responded to the rising demand for secondary places through investing in the expansion of existing schools. At secondary level, Barnet is nationally one of the highest exporters of school places with children coming from outside the Borough to attend school. The Free Schools Programme, funded by Government, has helped to tackle the pressure and so far there has been no shortfall in the provision of secondary places. Forecast levels of demand for places within the Borough's school catchment areas will also continue to be monitored by the relevant Council committee.

8.10 Special Educational Needs and Disability (SEND) Schools

8.10.1 A detailed review of Barnet's SEND provision has identified the need for additional capacity to meet growing demand for Special Educational Need (SEN) places. This is largely being addressed through expansion of existing special schools (Oakleigh Primary and Oak Lodge Secondary), together with the new SEN provision delivered through Kisharon School, and creation of new additionally resourced provision (ARP) at Whitefield school and Claremont Primary. The SEN review has indicated a specific growth in demand for pupils with Autistic Spectrum Disorders (ASD). Proposals to open a new all-through provision for ASD pupils, The Windmill School, has received approval from the Department for Education and is currently at pre-opening stage whilst a suitable site is being sought.

8.11 Early Years

- 8.11.1 The Council has a statutory duty to secure sufficient childcare for working parents and secure prescribed early years provision free of charge, ensuring eligible 2 year olds and all 3 and 4 year olds can access high quality free nursery education. Barnet's Children & Young People's plan sets out the vision for Barnet to be 'the most Family Friendly borough in London' This means making Barnet an even better place to live for all families and the strategy to achieve this is to focus on children's and families' resilience, which evidence shows is critical to achieving the best outcomes for children and young people. The pre COVID19 position was that Barnet had sufficient places across the borough to meet the needs of families for all of the free entitlement offers. This was made up of 336 providers, of which 200 are open all year round and 136 are term time only. This is made up of Schools with Nursery classes, 4 maintained nursery schools, the private voluntary and independent sector (PVI's) and childminder's.
- 8.11.2 The Education Strategy highlights that through continuous partnership working with schools, the best locations for school expansions and bulge classes will be identified. To secure additional Free Schools where and when they are needed the Council will work closely with the Department for Education (DfE), the Education and Skills Funding Agency (ESFA), the Regional Schools Commissioner and potential sponsors of Free Schools.
- 8.11.3 Barnet's Children and Young People's Plan 2019 – 2023 sets out the aim to make Barnet the most family friendly borough based upon a strategy which focuses on developing families' resilience in order to deliver the best outcomes for children and young people.
- 8.11.4 Children's Centres and Youth Centres provide a range of whole family services so that families are not required to attend multiple settings to access services that meet their needs. Working with key public sector partners including the NHS and Metropolitan Police the Council will pursue opportunities for co-location of services to enable families to be seen in a range of 'family friendly' settings, increase access and support the development of localised community relationships.
- 8.11.5 Family Services' vision is to ensure that all children and young people in Barnet, especially the most vulnerable children, achieve the best possible outcomes. To enable them to become successful adults, they should be supported by high quality, integrated and inclusive services that identify additional support needs early and are accessible, responsive and affordable for the individual child and their family. Barnet's Early Help strategy provides a framework to organise the early help services, to monitor their success, and to drive improvement.

8.11.6 The 0-19 Early Help hubs sit across 3 localities in Barnet – East Central, South and West. Within these hubs, partners are co-locating and co-delivering services to ensure integrated delivery of the Early Help offer across the 0-19 age range moving from the pilot stage. The Early Help Offer is underpinned by the Troubled Families Programme. Within the east central part of the Borough the hub is based at Newstead Children’s Centre. Other buildings within this locality are Underhill, BEYA and Coppetts Wood children’s centres. Also, in East Central locality is Finchley Youth Centre. In the western side of the Borough the main hub is based in Barnet and Southgate college. Other buildings are Wingfield, Barnfield (to be renamed Silkstream) and Fairway Children’s Centres as well as Canada Villa and Greentops centre. The south locality hub is based at Parkfield Children’s Centre which has also recently been remodelled to provide additional space for the service. There is also The Hyde, Childs Hill and Bell Lane Children’s Centre.

8.12 Further and Higher Education

8.12.1 Barnet has 22 Secondary Schools and Colleges that offer post 16 education opportunities, there are also a range of options for further and higher education in the Borough including Middlesex University. These options are important to ensure that students remain engaged in education until at least the age of 19. Overall, the number of Barnet young people who are not engaged in education, employment or training (NEET) is low. The quality and the wide range options of further education will assist in keeping the NEET numbers low. The Colleges and Middlesex University also offer important opportunities for post 19 and adult education. Barnet recognises the importance of life-long learning and the benefits that such opportunities can offer for people at all stages of life and therefore encourages the provision of post 19 and adult education. The Council will work on helping young people into local jobs; this is supported through policies set out in Chapter 9.

8.13 Provision for Older People

8.13.1 Barnet faces an increase in the numbers of older people. Future generations of older people have different expectations and aspirations. Life expectancy has been increasing over some time and there are increasing numbers of older people living at home with long term conditions, and also dementia. Provision of space to provide day services in support of those people with high dependency needs enabling them to continue to live successfully in the community will remain a priority. The Council is working on alternative models that promote choice and well-being that will meet the needs and aspirations of older people.

8.14 Community Premises

8.14.1 A major challenge for the Local Plan is ensuring the social infrastructure addresses the needs of a changing population. For many community groups it is difficult to maintain or extend existing buildings due to obsolescence, site constraints or the high value of land in the Borough, together with an inability to mitigate their impact on the local area. This has led to some people having to travel outside the Borough to meet and pursue community activities.

8.15 Burial Spaces

8.15.1 There are eight cemeteries in Barnet, four of which are owned by other local authorities for their residents. Hendon Cemetery provides the main source of non-denominational burial space for Barnet's residents. The remaining three cemeteries at Edgwarebury Lane, Hoop Lane and New Southgate are privately owned. The Mayor's audit of burial space found that Barnet has adequate capacity with sufficient new burial space available to meet the estimated demand for virgin space up to 2031³⁶.

8.16 Assets of Community Value

8.16.1 An 'Asset of Community Value' (ACV) is a building or area of land which currently, or in the recent past, furthers the social wellbeing or cultural, recreational or sporting interests of the local community and is expected to do so in the future. The Council will formally register the asset if it meets certain criteria. For those registered, if and when the owner decides to sell the asset, a local group can trigger a six month moratorium on the sale giving them time to raise the funds to purchase the asset (sometimes referred to as a 'right to bid'). Owners must consider bids, but they do not have to accept them.

8.16.2 The Council, when determining planning applications involving loss of community facilities, will treat the listing of an Asset of Community Value as an indicator of local support and evidence that it furthers the social wellbeing and interests of residents. Policy CHW04 Public Houses relates to the safeguarding of pubs.

Policy CHW01 Community Infrastructure

The Council will work with partners to ensure that community facilities including schools, libraries, medical and dental services, leisure centres and swimming pools, places of worship, arts and cultural facilities, community meeting places and facilities for younger and older people, are provided for Barnet's communities.

The Council will:

- a. ensure that programmes for capital investment in schools and services for young people address the needs of a growing, more diverse and increasingly younger population;
- b. support the enhancement and inclusive design of community infrastructure ensuring efficient use;
- c. support, subject to satisfactory management arrangements, the provision of multi-purpose community hubs that can provide a range of community services, particularly within town centres. Provision outside town centres will need robust justification;
- d. support and promote an alternative community use where the existing community use is surplus;
- e. require development that increases the demand for community facilities and services to make appropriate proportionate contributions towards existing facilities and new and accessible facilities Borough wide, particularly within Barnet's Growth Areas and town centres;
- f. work with the Mayor of London, cemetery providers and groups for whom burial is the only option to maintain a supply of burial space;
- g. allocate sites for development that address educational needs and demand with reference to up to date evidence as identified in the Council's Education Strategy;
- h. support proposals that as part of the visitor economy help contribute to, or seek to incorporate, museum/display space to celebrate the culture, history and archaeology of Barnet;
- i. support providers of new and improved educational facilities within the Borough, such as those at Middlesex University's Hendon campus and will encourage the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research

Development (including change of use) that involves the loss or replacement of existing community facilities / services will only be permitted if:

- the replacement facility is equivalent to or better quality and meets the needs currently met by the existing facility, or
- it has been demonstrated that the facility is no longer required in its current use and that it is not suitable and viable for any other forms

of social infrastructure for which there is a defined current or future need identified in the Infrastructure Delivery Plan.

In considering proposals involving the loss of community infrastructure the Council will take into account the listing or nomination of 'Assets of Community Value' as a material planning consideration.

The Council will support proposals for new community infrastructure where the following circumstances apply:

- i. it forms part of a mixed-use development and is located within a Growth Area or outside the primary frontages of the Borough's town centres (Policy GSS01 and Policy TOW02);
- ii. provides a replacement, enhancement of an existing facility or new multi-purpose community hub;
- iii. provides an alternative community use where the existing community use has identified there is surplus provision and where the alternative use can demonstrate a local need, and that there is no undue impact on the amenity of existing residents or the highway network;
- iv. it provides infrastructure in line with wider national policy requirements and local demands; and
- v. a statement is submitted which demonstrates how in particular the development addresses community needs.

All new community infrastructure should deliver a quality and inclusive design providing access for all as well as efficient, flexible, affordable and adaptable buildings. The developer will be required to reach a legal agreement with the Council on the continuing maintenance of the new community infrastructure and other future funding requirements.

8.17 Promoting Health and Wellbeing

8.17.1 The COVID-19 pandemic has served to further highlight existing public health challenges and disparities in health and wellbeing. This includes interaction between people and the built and natural environment and access to local open spaces, no matter how small. Local planning authorities therefore play a key role in shaping healthy environments and contributing to wellbeing. National and London Plan policy recognise the needs for creating public safe spaces, access to healthy food and drinks, social infrastructure and health facilities in order to promote health and wellbeing of local residents. This is further reinforced by Barnet's Health and Wellbeing Strategy 2021-2025 that sets out a vision for improving the health and wellbeing of the people who live, study and work in Barnet.

8.17.2 The Health and Wellbeing Strategy seeks to utilise the capacity and resilience of public health systems and partnerships to support Barnet to recover from COVID-19 and make a positive difference to health and wellbeing in the Borough.

- 8.17.3 Public Health England (PHE), “Spatial Planning for Health: An evidence resource for planning and designing healthier places,” (2017) reviews evidence across five elements of spatial planning: neighbourhood design, housing, food environment, natural and sustainable environments and transport. This provides an overview of the best available evidence for the relationship between the built and natural environment and health. Most of the measures are included in Chapters across this Local Plan to ensure that promoting health and wellbeing for Barnet’s residents aligns with PHE recommendations. Furthermore, the Local Plan emphasises Barnet’s commitments for improving health and wellbeing in the Borough.
- 8.17.4 Through promoting and endorsing high quality design which meets Healthy Streets Indicators (as set out in the London Plan), the Council will create accessible, safe spaces which promote health and social wellbeing. This is particularly important for ensuring that residents with mobility issues can live independent lives as much as active members of their communities can.
- 8.17.5 Another necessity for urban environments is access to social infrastructure such as public drinking fountains, public toilets including changing places, seating and shade. The need for public toilets and access to clean drinking water is more prevalent amongst certain groups such as the elderly, disabled and families with young children. Lack of provision can further deter people going out in the community, increasing the risk of social isolation and poor mental health. Provision is promoted through London Plan policies on Public Realm D7 and Public Toilets S6 and supported within the Local Plan as part of the Council’s approach to managing and improving the public realm (see Policy CDH03). Good design, management and maintenance of such facilities is important.
- 8.17.6 Access to healthy food and drinking water makes a sustainable contribution to the overall health and wellbeing. Locally grown food enables easy access to healthy food and it also promote mental wellbeing while increasing the social capital of the community. Policy ECC04 - Barnet’s Parks and Open Spaces, seeks to ensure existing food growing spaces are protected and new spaces are created as part of new developments. Policy TOW03 highlights that where hot food takeaways are permitted the Council will ensure, through a planning condition, that the operator will operate in compliance with the Council’s Healthier Catering Commitment within 6 months of opening.

8.18 Access Integrated Health and Care Services

8.18.1 Predicted population growth coupled with housing growth locally will create additional demand on the existing health infrastructure. General Practitioners are central to the co-ordination and delivery of patient care and act as a first point of call, however it is also crucial to plan for other models of care. Primary Care Estate at the North Central London and local level will be the primary vehicle for enabling planning of local new health care models.

8.18.2 The significant population growth will put a considerable demand on an aging health and care estate. Investment in the health and care infrastructure is essential to meet the health needs of the current and future population. Infrastructure is both a catalyst and an enabler to supporting the local care priorities, and the investment need is wide ranging, from increasing capacity in the existing estate, building new facilities, digital technologies, and investing in community innovation projects.

8.18.3 Currently the health and care system is planned and commissioned locally by clinical commissioning groups (CCG), local authorities and NHS providers. Within North Central London these partners have worked together to develop a Sustainability and Transformation Plan. This sets out how local health and care services will transform and become sustainable over the long-term period as set out in the NHS Long Term Plan. The benefits of the joint planning between the CCG and the Local Plan is increased access to primary care facilities and health and care integration.

8.18.4 Another key part of the NHS Long Term Plan is the formation of Integrated Care Systems (ICSs). 2021/22 will see the local health and care system transition into an ICS. An ICS is a partnership that will bring together providers and commissioners of NHS services across a geographical area with local authorities and other local partners, to collectively plan and integrate care to meet the needs of their population. The central aim of the ICS is to integrate care across different organisations and settings, joining up and potentially co-locating acute/hospital services, community-based services, primary care, physical and mental health, voluntary services, and health and social care, with the following four fundamental purposes:

- Improving population health and healthcare
- Tackling unequal outcomes and access
- Enhancing productivity and value for money
- Helping the NHS to support broader social and economic development

- 8.18.5 At a Borough level the Integrated Care Partnerships (ICPs) has been established, and in Barnet the ICP is a mature partnership with a clear governance structure in place. The ICP will develop a local care plan that is tailored to the needs of the Barnet population at a borough, locality, neighborhood and Primary Care Networks (PCN) level.
- 8.18.6 A key focus of the North Central London integrated health and care plan is to prevent ill health, which includes partnership working to tackle the wider determinants of health. An integrated care system will deliver services at different levels, including neighbourhood networks and PCNs based around GP practices, 'Borough Partnerships' and as a North Central London 'Integrated Care System'. Digital innovation developed through COVID19 may be beneficial to continue as part of a new fixed remote and face to face model that enhances service user experience and access. This may lead to a review of how facilities are used and designed.

8.19 **Healthy and Green Barnet**

- 8.19.1 Barnet's open spaces and outdoor sports and recreational facilities are an important element of the Borough's character and all contribute to health and wellbeing. The importance of open space to access and enjoy during the COVID-19 lockdown has been highlighted by increased usage of Barnet's parks and open spaces. As Barnet grows there is a need to improve provision and plan for the creation of at least one new district park and 13 new local parks by 2040.
- 8.19.2 With an extensive green infrastructure incorporating public rights of way, parks and gardens together with a comprehensive network of sports and recreational facilities, there is an opportunity to create more active environments. By providing better access to green public spaces and improving sports and community facilities the Council seeks to promote the integration of physical activities into the everyday lives of residents, as well as encouraging a better understanding of the natural environment. Thereby assisting in the improvement of the physical and mental well-being of residents.

Policy CHW 02 – Promoting health and wellbeing

In order to recover, restore and thrive and make a positive difference to health and wellbeing in the Borough following COVID19 the Council will promote the creation of healthy environments and safe, accessible, sustainable and high-quality places which seek to improve physical and mental health and reduce health inequalities.

The Council requires development to positively contribute to creating high quality, active, safe and accessible places. Measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development where appropriate. The Council will ensure that the health and wellbeing impacts of larger development proposals are addressed in an integrated and co-ordinated way through the use of Health Impact Assessments.

The Council will support the health and wellbeing of residents by:

- a. Contributing to the priorities of the Health and Wellbeing Board and partners to help reduce health inequalities across Barnet;
- b. Supporting the North Central London Estate Plan and the implementation of NHS Long Term Plan in responding to demand and integration of health and social care, including the use of developer contributions to support investment in healthcare infrastructure;
- c. Adopting the principles set out in Sport England's Active Design Principles;
- d. Providing access to free drinking fountains and public toilets and changing places in new and improved public realm as set out in Policy CDH03;
- e. Ensuring compliance with the Healthy Catering Commitment as set out in Policy TOW03;
- f. Applying the Healthy Streets Approach, as set out in the London Plan;
- g. Mitigating the impact of air pollutants as set out in Policy ECC02; and
- h. Deliver more sustainable and active travel as set out in Policy TRC01

8.20 Making Barnet a Safer Place

- 8.20.1 Despite Barnet being amongst the safest boroughs in London, crime and anti-social behaviour remain a key concern of local residents. Understanding how we can create safer environments through well planned good growth is key to the 'place-shaping' agenda.
- 8.20.2 As highlighted in the Children and Young People's Plan the Council conducts regular surveys to gain the views of young people. The top concern of this generation remains crime. As Barnet's population is forecast to become younger it is imperative that new generations have the opportunities to benefit from growth. Helping young people feel safer particularly at night, in parks and open spaces and on public transport is an important deliverable for the Council and this Local Plan.
- 8.20.3 Barnet's population is changing. With increased diversity and population mobility it is important that new communities integrate cohesively with settled ones. In order for Barnet's town centres to thrive and be successful they need to provide attractive and safe environments, particularly for the Night Time Economy.
- 8.20.4 Everyone should feel safe on the streets of Barnet, therefore the Council will continue to take tough measures to tackle anti-social behaviours. The planning system has an important role to play in reducing the opportunity for crime and disorder and making places safer. Well planned, mixed use areas, good quality public realm, carefully designed buildings, open spaces and neighbourhoods can "design out" crime and help to reduce the fear of crime. This includes appropriate lighting, encouraging natural activity, providing natural surveillance, reducing opportunities for concealment, appropriate placement of public realm and managing permeability ensuring the safety of pedestrians and cyclists. Proposals should reflect guidance in the NPPG and Secured by Design, the official UK Police flagship initiative for 'designing out crime'. In addressing Secured by Design principles developers are strongly encouraged to work with the Metropolitan Police's Secured by Design Officers and to aim to be awarded a Secured by Design Award. Developers should also obtain advice from the London Fire and Emergency Planning Authority (LFEPA). The Council will seek to ensure that any new transport interchanges are designed to help address personal safety and reflect Secured by Design, helping reduce the number of road traffic accident casualties. Measures to design out the effects of flooding is set out in Policy ECC02A.
- 8.20.5 Visual interest on a street can be created by entrances, windows and shopfronts which help contribute to a sense of security. Blank facades create a dead frontage with no interest and can be part of a building, boundary wall or fence or roller shutter to a shopfront. In particular larger windows or shopfronts can make a more positive contribution to the vibrancy of frontages. This is most important in town centres, local centres or on major roads where active frontages should be incorporated at street level to contribute to the vibrancy of a street.

Policy CHW03 - Making Barnet a Safer Place

The Council will:

- a. work with partners to tackle risks of terrorism, crime, fear of crime and anti-social behaviour;
- b. require development proposals to reflect 'Secured By Design' (see Policy CDH01) and work with the Metropolitan Police's Secured by Design Officers;
- c. expect measures to design out crime together with appropriate fire safety solutions to be integral to development proposals. These measures should be considered early in the design process
- d. work with the Metropolitan Police, London Ambulance and London Fire and Emergency Planning Authority to provide effective and responsive emergency services in Barnet;
- e. support the work of neighbourhood policing teams to make neighbourhoods in the Borough safer places to live in, work in and visit;
- f. encourage appropriate security and community safety measures in buildings, spaces and the transport system;
- g. require developers to demonstrate that they have incorporated design principles which limits the opportunities for crime and anti-social behaviour and thereby contributes to community safety and security in all new development;
- h. ensure that through the town centre strategy programme safer and more secure town centre environments are promoted; and
- i. promote safer streets and public areas including open spaces (see Policy CDH03).

8.21 Public Houses

8.21.1 Around 70 pubs have closed in Barnet since 2000. The COVID19 pandemic lockdown and social distancing measures have had a significant impact on the hospitality sector with many pub businesses not surviving. However, COVID-19 has highlighted the contribution of pubs to well-being and as a valued community destination away from home. Whether alone, or as part of a cultural mix of activities or venues, pubs are often an integral part of an area's day, evening and night-time culture and economy. Public houses can be at the heart of a community's social life often providing a local meeting place, a venue for entertainment or a focus for social gatherings. Barnet's evidence on Public Houses highlights that once pubs are lost to other uses it is unlikely that they will be returned to their original use. This is likely to be exacerbated by the impact of COVID19 on the survival of pub businesses.

8.21.2 The Government has made a number of changes to the Planning Use Classes Order to help protect pubs. In May 2017, the Town and Country Planning Act (General Permitted Development Order) (England) (2015) removed permitted development rights that previously allowed the conversion of pubs and bars to other uses such as shops, restaurants and cafés without planning permission. This change in legislation offered greater protection for pubs and also incorporated a permitted development right allowing pub owners to introduce a new mixed use (A3/A4) providing flexibility to enhance a food offer beyond what was previously allowed as ancillary to the main pub use. A further change to the Use Classes Order in 2020 has deleted the 'A Use Class' including A3 and A4 and reclassified public houses, wine bars, or drinking establishments as Sui Generis (in a class of its own). This provides further protection for existing pubs.

8.21.3 While pubs have been closing, evidence highlights that micro-breweries in Barnet have been emerging as successful SMEs. Local breweries can help bring life back into pubs as well as create jobs for the local community, save on costs for logistics and create a community focus.

8.21.4 Listing a pub as an Asset of Community Value (ACV) gives voluntary groups and organisations the opportunity to bid for it if it is put up for sale. An ACV listing does give communities an increased chance to save a valued pub or other local facility.

8.21.5 When assessing whether a pub has heritage, economic, social or cultural, value, the Council will take into consideration a broad range of characteristics, including whether the pub:

- is in a Conservation Area;
- is a locally- or statutorily-listed building;
- has a licence for entertainment, events, film, performances, music or sport;
- operates or is closely associated with a sports club or team;
- has rooms or areas for hire;
- makes a positive contribution to the night-time economy;
- makes a positive contribution to the local community; and
- caters for one or more specific group or community.

8.21.6 Where an application is based on a public house no longer being a viable commercial operation, appropriate marketing evidence will be required. This will need to show that there is no realistic prospect of a building being used as a public house in the foreseeable future and that the business has been marketed for at least 24 months as a pub at an agreed price following an independent valuation and in a condition that allows the property to continue functioning as a pub. The business should have been offered for sale locally and London-wide in appropriate publications and through relevant specialised agents. Adapting a public house for another community use would be preferable to its loss to another use.

Policy CHW04 – Protecting Public Houses

- a. The Council will:
1. protect public houses where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres; and
 2. support proposals for new public houses in Growth Areas and town centres as part of mixed-use development.
- b. Proposals that involve the loss of public houses with heritage, cultural, economic or social value will be refused unless there is no viable demand for its continued use and the property has been long term vacant for a period of at least 12 months. Evidence of continued marketing over a 24 month period will be required.
- c. Where it is demonstrated that there is no demand for the public house the Council will support proposals for other community uses in accordance with Policy CHW01.
- d. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house that would compromise the operation or viability of the public house use will be resisted.

In considering proposals involving the loss of public houses the Council will take into account the listing or nomination of 'Assets of Community Value' as a material planning consideration.

9 Chapter 9 - Economy

9.1 National and London Plan Policy Context

9.1.1 Specific National and London Plan Policies to be taken into account:

NPPF

Section 6 Building a Strong and Competitive Economy specifically paras 80, 81 and 82.

London Plan

Policy SD10 Strategic and local regeneration

Policy D13 Agent of Change

Policy HC5 Supporting London's culture and creative industries

Policy HC6 Supporting the night-time economy

Policy E1 Offices

Policy E2 Providing suitable business space

Policy E3 Affordable workspace

Policy E4 Land for industry, logistics and services to support London's economic function

Policy E6 Locally significant industrial sites

Policy E7 Intensification, co-location, and substitution

Policy E8 Sector growth opportunities and clusters

Policy E11 Skills and opportunities for all

9.2 Introduction

9.2.1 Barnet has a relatively low supply of established industrial sites and office accommodation. Requirements for this space are changing, partly in response to the COVID19 pandemic with the growth of homeworking but mainly in response to the manner in which businesses have modernised the ways they operate. The Local Plan can help to provide the conditions that modern businesses are seeking and thereby foster an economically sustainable place where Barnet residents have access to local jobs and services.

9.2.2 Barnet does not currently have a single economic hub. Office based firms are distributed across the Borough's network of town centres, in particular along the A1000. Light industry is more focussed around the M1 and A1. Over the lifetime of the Local Plan the majority of employment opportunities in the Borough will be provided at Brent Cross, the town centres (see Chapter 7) as well as the 22 designated Locally Significant Industrial Sites (LSIS).

9.2.3 The fundamental review of the Use Classes Order in 2020 with the creation of the new and wider Use Class E – Commercial, Business and Service Uses will allow greater flexibility to change between such uses and will have an impact on Barnet's town centres and designated employment areas. Coupled with changes in work practices there is greater uncertainty about office space (the former B1a use class which now forms part of Use Class E). However, the demand for B2 – General Industry and B8 – Warehousing is less impacted. This creates uncertainty such as at Brent Cross where there is planning consent for approximately 400,000 m² of former B1 office space. Changing requirements for modern office space should be met within Barnet's town centres as these are the most sustainable locations and have the potential to be used as more flexible centres for commercial activities, providing an attractive alternative to central London.

9.3 **Barnet Growth Strategy 2020-2030 – Growing the Local Economy and Supporting Local Businesses**

9.3.1 With high levels of self-employment and entrepreneurship in Barnet the Council wants to better understand the needs of small businesses and the challenges they face locally. The Council's Growth Strategy sets out the Council's approach to make Barnet '*a great place to live, work, do business and visit.*'

9.3.2 The Growth Strategy aims to attract a mixture of employment opportunities into town centres. It will support existing local businesses as well as encourage new business to locate or start-up in Barnet. Assistance can also be provided to support residents' ability to access employment and skills training as part of getting local people into work.

9.3.3 Providing affordable and flexible workspace helps small to medium enterprises (SMEs) to thrive and continue their contribution to Barnet's prosperity.

9.4 **Local Economy Evidence Base**

9.4.1 Barnet's economic evidence base is comprised of a range of studies. These include the London Office Policy Review (LOPR), London Industrial Land Demand Study (LILDS), West London Employment Land Review (WLELR) and Barnet's Employment Land Review (BELR). Both were produced on the basis of the pre-2020 Use Classes Order. The BELR considered Barnet's supply of office and industrial space as well as the prospects for the office market and jobs growth. It also set out the opportunities for affordable workspace in Barnet. Both the BLER and the WLELR studies demonstrate that industrial space is needed and safeguarding of existing industrial land is a priority.

9.5 **Employment**

9.5.1 In terms of local employment the BELR highlights that jobs may be lost as a consequence of constraints within Barnet's commercial property market. A reduced stock, leading to rising rents, together with a lack of new investment could lead to businesses moving out of the Borough. The situation is compounded by competition between the residential and commercial markets. Following the introduction in 2020 of the wider Use Class E for commercial, business and services use (and subsequent reforms) it remains unclear if greater flexibility for commercial uses will strengthen it's protection from conversion to residential.

9.6 Office

9.6.1 Produced before COVID19 and the introduction of Use Class E in 2020 the LOPR and BELR were positive about the prospects for new office space in Barnet. The Brent Cross proposals will create a significant employment location in the Borough which is anticipated to have a positive impact on the demand for office space in the Borough. While the Office Guidelines provided in Annex 1 of the London Plan advises that the Council should only protect small office capacity in Edgware, Chipping Barnet, Finchley Central, North Finchley and Whetstone the BELR is more positive regarding the ability of Barnet's Town Centres to accommodate new office space.

9.6.2 The BELR states that the Barnet office market:

- is dominated by small firms. Many of these self-employed, single person businesses will be operating from their own homes.
- similarly to the rest of London it is less restricted in regards to occupation of buildings due to the adoption of technology and new business processes.
- is well placed to provide space for smaller occupiers who want to be a part of a 'business community', where they can interact with other businesses and enjoy flexible terms.
- Could reach up to 42,000 jobs by 2036, with a net additional demand for office floorspace in Barnet of at least 67,000m² over the period 2016-36. However, the speed with which Brent Cross office development (395,000 m²) is delivered will determine this growth.
- The overall picture is of a small-scale market meeting largely local demand, notwithstanding a small number of freestanding corporate headquarters. The market is very vulnerable to pressure for residential conversion and, even without permitted development is prone to attrition and gradual loss of employment land. The BELR highlights that the biggest risk to supply is gradual loss.

9.6.3 The impact of greater flexibility on changing between commercial uses and changes in work practices as a consequence of COVID19 are most likely to be felt in the office market. The nature of Barnet's office market may put it in a better position to respond to these changes within the network of town centres.

9.6.4 The Council has taken measures to decrease the vulnerability of the employment market in the Borough by introducing an Article 4 Direction³⁷ to remove the permitted development rights for office and light industrial uses to residential in nine town centres, the LSIS sites, Business Locations and two out of town centre office blocks. The Council recognises that overtime some buildings in these areas will be in need of renewal, but loss of employment space will not be supported.

9.6.5 Over the Plan period Brent Cross, Edgware and the District Town Centres will continue to represent the key areas of office based growth and job creation, especially for small to medium sized enterprises. There will also be opportunities for jobs creation in the New Southgate Opportunity Area in the latter stages of the Local Plan. The Council will work with developers to deliver a range of employment opportunities in town centre locations, especially those with good public transport access.

9.7 Industry

9.7.1 The London Industrial Land Demand Study (LILDS) identifies Barnet as needing to retain industrial land as the vacancy rates are below the London average. London Plan Policy E4 requires a sufficient supply of land and premises to meet current and future demands for industrial and related functions should be provided and maintained.

9.7.2 The BELR and WLELR both highlight that although the majority of Barnet's industrial stock is small and ageing there is little vacancy. However, this lack of availability does indicate supply issues which have contributed to increased rents for industrial land in the Borough. On the basis of a land demand methodology the LILDS estimates that Barnet would need 7.3ha of industrial land to meet forecast demand across industrial sectors while the WLELR, using a labour demand methodology, indicates that 13.5ha would be required. Despite the differing methodologies both studies demonstrate that industrial space is needed in Barnet and there is opportunity to strengthen the role of industrial uses in the local economy. The studies also strongly support the safeguarding of existing industrial land, ensuring that it is managed for retention and growth and/or intensification, with no net loss of industrial land being paramount.

9.7.3 Barnet envisages meeting the identified need through intensification and windfall. The non designated sites being designated acknowledge the need to maintain the existing level of provision in the Borough therefore their designation as LSIS will not meet the identified need.

9.7.4 Intensification presents challenges for the smaller areas of LSIS in Barnet. Proposals for intensification should provide, a detailed description of existing/intended use, site size, options for optimal building configuration, how the principal of 'no net loss' is being achieved and the operational yard space required (including, if necessary, employee car parking) to ensure that the proposal does not compromise the operational functioning of the site, and/or create issues for neighbouring businesses or surrounding roads with loading and parking occurring off-site.

- 9.7.5 Another approach for the delivery of employment use is to co-locate uses. Within LSIS this may result in formalised employment mixed use such as research and development (formerly B1c) and B8 (storage and distribution). On the edge of town centres a mix of non-office employment and residential may be appropriate depending on how the design of the site is configured to enable the residential and non-office uses to operate without negatively impacting on each other.
- 9.7.6 Co-location of residential uses in a LSIS can prove problematic for both the existing businesses and new residents in regards to impacts of noise, dust, operating hours as well as traffic vehicle manoeuvres and overall quality of amenity. The Agent of Change principle set out in the London Plan Policy D13 aims to protect the existing uses and prevent impacts on business operations in planning terms, however, this may not prevent the new residents from making complaints to Council and placing pressure on businesses to close or relocate. For these reasons any applications for co-location in an LSIS must be employment led³⁸ and demonstrate how a development will enable the continued functioning of the LSIS while delivering high quality residential accommodation that meets high quality design standards such as; triple glazed windows, careful consideration of siting of opening windows and balconies, the inclusion of air filtering mechanisms and high standards of sound insulation.
- 9.7.7 On non-designated industrial sites if co-location is proposed as an approach or a residential use is proposed adjacent to an operating industrial use the highest possible building and design standards should be demonstrated to ensure business operation either onsite or those in the surrounding area are not impacted by the proposed residential use. London Plan Policy E7C requirements should also be met. For the residential element high quality design would be expected as set out above in para 9.7.6.
- 9.7.8 In terms of industrial space, the BELR and WLELR highlight that:
- While manufacturing and other industrial activity is in decline, there continues to be strong demand from companies wanting to occupy 'industrial' buildings. Barnet needs to find a way of accommodating the needs of this diverse group of occupiers.
 - Barnet should retain its industrial land as supported by the London Plan and its underpinning evidence base the 2017 London Industrial Demand Study. In retaining land the Council should also seek to intensify economic activity.
 - 'Industrial' type businesses require higher specification with flexible space. New stock, if provided, is likely to use land more intensively and to provide more flexible space that is appropriate to modern business processes.

9.8 Article 4 Direction

- 9.8.1 The Valuation Office Agency Business Floorspace Statistics 2016³⁹ states that Barnet's stock of office floorspace is 343,000m². The Permitted Development Right to change office into residential has resulted in Barnet losing over 40,000m² of office space (May 2013-March 2017). The Council has made Article 4 Directions⁴⁰, restricting the change of use from employment (Former Use Classes B1a and B1c) to residential use (Use Class C3). The Article 4 Directions came into force in October 2019 prior to the changes to the Use Classes Order in 2020. However, they continue to serve as a safeguard for commercial, business and service uses.
- 9.8.2 Sites within the Article 4 Direction have been selected for their importance to the economic sustainability of Barnet. The distribution of Article 4 Direction areas highlights the dispersed nature and variety of employment sites in Barnet.

9.9 A Vibrant Local Economy

- 9.9.1 Barnet's designated LSIS, are the focus for development of light industrial, Class B2 (general industry) Class B8 (storage and distribution) and employment generating sui generis uses. Brent Cross, Edgware, the District Town Centres and potentially New Southgate in the latter stage of the Local Plan are the focus for accommodating office development and light industrial uses appropriate for town centres.
- 9.9.2 Industrial land uses and office space continue to make a valuable contribution to the local economy and provide important local services as well as jobs. The Council seeks to protect industrial land and office space alongside planned growth of new business space. This approach is supported by Policies E2 and E6 of the London Plan.
- 9.9.3 Barnet's LSIS are listed in Table 14. Following recommendations in the BELR and to provide consistency with the Article 4 Designations seven new LSIS have been designated, this is also consistent with London Plan policy of recognising previously non-designated industrial sites. The Council has designated new LSIS at Bittacy Hill, Coppetts Centre, Falkland Road (Alston Works), Hurricane Industrial Park and Propeller Way. Permitted development changes of use from employment to residential on the Grenville LSIS and on part of the Lancaster Road LSIS have resulted in the de-designation of Grenville LSIS and a portion of the Lancaster Rd LSIS. Revisions to LSIS are shown in the Changes to the Policies Map document.

Table 14 – Barnet’s Locally Significant Industrial Sites and Business Locations

Site Name	Article 4	Area (ha)
Queen’s Road Industrial Estate	Yes B1a & B1c	0.9
Falkland Road (Alston Works)	Yes B1a & B1c	0.5
Hadley Manor Trading Estate	Yes B1a & B1c	0.8
Redrose Trading Centre	Yes B1a & B1c	0.5
Lancaster Road	Yes B1a & B1c	1.2
Granard Business Centre and Churchill House	Yes B1a & B1c	0.8
Bunns Lane Works	Yes B1a & B1c	0.6
Mill Hill Industrial Estate	Yes B1a & B1c	1.0
Hurricane Industrial Park	Yes B1a & B1c	0.4
Propeller Way	Yes B1a & B1c	0.4
Connaught Business Centre	Yes B1a & B1c	1.0
Garrick Industrial Centre	Yes B1a & B1c	7.4
Bittacy Hill Business Centre	Yes B1a & B1c	0.8
Finchley Industrial Centre	Yes B1a & B1c	0.9
Oakleigh Road South (Railway Yard)	No	3.5
Brunswick Industrial Park	B1a & B1c	4.0
Coppetts Centre Colney Hatch	Yes B1c	1.1
Colindale Technology Park and Cecil Rd	Yes B1a & B1c	0.8
100 (30-120) Colindeep Lane	Yes B1c & B8	1.3
North London Business Park	Yes B1a & B1c	16.2
Squires Lane	Yes B1 & B1c	4.3
Regent Office Park	Yes B1a	2.3
	Total Area	50.7

- 9.9.4 Outside LSIS all employment spaces will be protected where viable to enhance Barnet's local economy and support enterprise potential. Effective marketing is where a site has been continuously actively marketed both for sale and rent for a period of 12 months at an appropriate price which can be agreed in advance with the Council (at pre-application stage if appropriate) for re-use or redevelopment for employment use and no interest has been expressed. Any redevelopment should then be employment led. An employment led development is one where the employment generating (as defined by ECY01) floorspace is greater in proportion to the other uses proposed on the site and results in no net loss of employment space.
- 9.9.5 The principle of 'no net loss' relates to the whole site i.e. it includes employment floorspace and includes land area around the building(s) as this can be utilised as yard and loading space which can be particularly important for the effective functioning of industrial uses.
- 9.9.6 The impact on local employment will be considered using the HCA Employment Density Guide 2015, or updated equivalent, and re-provision, preferably business units, which can secure an equivalent amount of floorspace and level of employment. will be favoured. A financial contribution will be required for the refit of existing employment space in the Borough or for employment training, where this cannot be delivered. Further details are set out in the SPD on Contributions to Enterprise, Employment and Training.
- 9.9.7 Developers intending to bring forward commercial space in the Borough should enter into preapplication discussions with the Council. This will enable the requirements of workspace providers to be considered early on in the design of the proposal. The Council will expect all new commercial space to be designed to appropriate floor to ceiling heights and fitted out to a standard that allows for a straightforward occupation for commercial tenants. The LLDC Employment Space Design Study offers examples of such space standards across a range of commercial uses. This is regarded as offering appropriate templates for employment floorspace design that are relevant to London.
- 9.9.8 Proposals for alternative uses within the designated Locally Significant Industrial Sites (LSIS), will only be supported where the development is employment led and does not harm the functioning of the LSIS. Proposals for development of new or extensions to former Class B1 uses, which are outside of the designated areas (i.e. Locally Significant Industrial Sites, as well as Brent Cross, Major and District Town Centres) must not negatively impact on the character of the surrounding area.

Policy ECY01: A Vibrant Local Economy

The Council will seek to protect and promote new employment opportunities and create a vibrant local economy across Barnet by:

Office

- a) Safeguarding office space in Town Centres and edge of centre locations. Any proposals for redevelopment of office uses outside these locations must demonstrate that the site is no longer suitable and viable and that an alternative business use including affordable workspace solutions has been considered and that a suitable period of active marketing has been undertaken. Where this can be demonstrated the proposal will be expected to provide appropriate mixed use re-development including residential and community use as well as re-provision of employment use.
- b) Supporting up to 67,000 m² (net) of new office space in District Town Centres, to accommodate small and medium enterprises (SME) and supplement office accommodation (395,000 m²) already approved for Brent Cross.

Industrial

- c) Supporting appropriate proposals within a Locally Significant Industrial Site (LSIS) that are one or a combination of the following uses:
 - Class B2 (general industry);
 - Class B8 (storage or distribution); and/ or
 - Uses related to light industrial or research and development;
 - Sui Generis uses, where this use is an employment generating use compatible with an industrial use⁴¹;

Any office uses within a LSIS should be ancillary to the other employment uses on site and be directly related to the majority uses proposed.

- d) Supporting intensification of uses listed in (c) in a LSIS where it can be demonstrated that the design does not impact on the operational capability of the proposal site or the neighbouring sites within the LSIS.
- e) Supporting affordable workspace solutions where the uses are within the use classes set out in (c).
- f) Warehousing uses or uses which generate high levels of movement should be located in close proximity to tier one and two roads and minimise impacts on residential areas.

- g) Where co-location of residential uses is proposed in an LSIS the development should be employment led and the Agent of Change Principle used in favour of existing and proposed employment uses. The introduction of residential uses into an LSIS should not prejudice its ability function as an industrial area.

General

- h) Seeking to protect existing office accommodation and light industrial uses in areas covered by Article 4 Direction. The loss of employment accommodation in these areas will not be supported.
- i) In assessing proposals for alternative uses to those outlined in (a), (b) and (c), on non- designated employment sites, as well as London Plan Policy E7C the following will be taken into consideration:
- i. Premises have been vacant for over 12 months and have no reasonable prospect of being occupied, following demonstrable active marketing during this period using reasonable terms and conditions, with the exception of meanwhile uses in accordance with j) iii).
 - ii. Loss of a commercial use at ground-floor level.
 - iii. Contribution of the proposed use to the Council's growth objectives for the local area.
- j) Supporting new employment space outside of the locations outlined in (a), (b) and (c) if the following criteria are met:
- i. The new employment use would contribute towards the Council's regeneration objectives.
 - ii. Employment uses which generate high levels of movement should be located in close proximity to tier one and two roads
 - iii. The new use does not have any adverse impact on residential amenity.
 - iv. The site is not allocated for an alternative use including residential, education or community uses
- k) Requiring all employment space to be designed to appropriate floor to ceiling heights and space requirements for the intended uses including on site servicing and space for waiting or goods vehicles.
- l) Expecting all proposals for new employment space to undertake a Transport Impact Assessment as set out in Policy TRC01.
- m) Financial contributions will be secured from development that results in a net loss of employment floorspace to invest towards improving employment space elsewhere in the Borough and/ or towards training and other initiatives that seek to promote employment and adult education in the Borough.

9.10 Affordable Workspace

9.10.1 The London Plan defines Affordable Workspace as:

“workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. It can be provided and/or managed directly by a dedicated workspace provider, a public, private, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured permanently in perpetuity or for a period of at least 15 years by planning or other agreements.”

9.10.2 Affordable workspace is differentiated from low cost work space, which is secondary and tertiary space that is available at market rents but these rents are at the lower end of the market due to one or more of the following the low specification (in comparison to prime space); is found in non prime locations; and/or is in older building stock.

9.10.3 The BELR highlights that 98% of businesses in Barnet have less than 49 employees, and that 22% of businesses are self-employed. Micro and small businesses are therefore very important to Barnet’s economy. The trend across London is that the numbers of such businesses will increase. The BELR recommends that Barnet should retain its existing stock and provide, opportunities for an increased provision of affordable and flexible workspace. This will help Barnet retain a sufficient range of stock of both varying quality and size. In particular the BELR highlights that:

- Retaining a range of employment stock can help suit the different levels at which firms find premises ‘affordable’. Occupier preferences are changing the ways in which they use built stock, with implications for markets across London. The rapid growth in serviced, managed and collaborative spaces is evidence of major economic change.

9.10.4 The BELR emphasises the need for the provision of affordable and low cost floorspace in a variety of formats to support the needs of start-ups and SMEs. Policy ECY02 sets out a requirement that within Barnet’s designated employment areas, Brent Cross, Edgware, New Southgate and District Town Centres any major commercial development schemes or mixed-use schemes should provide a minimum of 10% of the gross floorspace affordable workspace, either on or off-site.

9.10.5 Developers bringing forward commercial space are encouraged to liaise with the Council’s Business, Employment and Skills Team as part of their preapplication discussions. This will ensure that, where necessary, appropriate affordable workspace providers can be involved early at the design stage. Where developers are unable to provide affordable workspace on site a financial contribution will normally be sought. This will be calculated using Gross Internal Area (sqft) x Base build cost rate (psf) as set out in Table 15.

Table 15 – Estimated Base Build Costs

Space	Base build cost rate £psf*
Light Industrial	£93
Office	£217
Kitchens	£105

*BCIS positive indexation will be added to these costs using the month and year of Local Plan adoption as a base date for indexation.

9.10.6 Affordable workspace and/or any offset contributions will be secured through S106 legal agreement with the Council. A Council registered workspace provider should also be secured, preferably before the grant of planning consent. Affordable workspace should be provided in perpetuity.

Policy ECY02: Affordable Workspace

The Council will promote economic diversity and support existing and new business development in Barnet by requiring through legal agreement:

- a) New employment space in the Borough's designated employment areas and mixed use development, in Brent Cross, Edgware, New Southgate and District Town Centres should provide affordable workspace, equating to a minimum of 10% of gross new employment floorspace, or equivalent cash-in-lieu payment for off-site provision of affordable workspace.
- b) new employment provision should include a range of unit sizes and types such as affordable and flexible workspaces and working hubs that allow for 'touch down' working. Uses should be appropriate for the location and in accordance with ECY01.
- c) Developers should liaise with managed workspace providers at the design stage of the development to determine end user requirements and ascertain a range of unit sizes that are flexible, suitable for subdivision and configuration for new uses and activities, including for occupation by small or independent commercial enterprises.
- d) Mixed use development proposals in town centres should consider the provision of flexible space within the scheme that can be used by individual workers, start-ups and as accelerator space.

9.11 Local Jobs, Skills and Training

9.11.1 Barnet's Growth Strategy emphasises the importance of having a skilled local workforce and the positive impact this can have on economic growth.

Promoting economic and social inclusion in Barnet is a major priority for the Council, ensuring that residents seeking work have the right skills and opportunities to gain employment. Barnet's Work, Skills and Productivity Action Plan prioritises support for young people between 16 and 24 and is working directly with those furthest from the labour market to unlock opportunities to access employment. It is also seeking to improve pathways into work by prioritising high growth sectors; and delivering at scale and pace to ensure a fast recovery and prevent many residents from falling out of work.

9.11.2 In order to help local residents secure local jobs, Policy ECY03 seeks to address skills deficiency between the Borough's employers and the local community by seeking contributions towards local employment training programmes. These will largely be related to the development industry and in certain cases end-use jobs. This helps to provide residents with the skills needed to fill jobs both locally and further afield, thereby increasing employment opportunities for Barnet's residents. Development proposals are required to meet the requirements of the Council's Delivering Skills, Employment, Enterprise and Training (SEET) from Development SPD (2014) or equivalent SPD.

9.11.3 The SEET SPD sets out a requirement for developers to enter into a Local Employment Agreement (LEA) with the Council in order to deliver a range of benefits to residents. Benefits include:

- Apprenticeships;
- Work experience;
- Progression into employment for those dependent on benefits;
- Local labour;
- Local suppliers; and
- End use jobs (where appropriate)

9.11.4 The majority of major developments can provide opportunities for apprenticeships, and work experience for residents and local suppliers in the construction phases. Where a development is creating 20 or more full time end use jobs then the Council will seek to secure employment opportunities for Barnet residents.

9.11.5 Financial contributions may be accepted in exceptional circumstances in lieu of onsite or development related employment provision. The LEA and/ or financial contributions will be agreed as part of the s106 Agreement. However, outline LEAs should be agreed as part of the application process to ensure the Council and applicants are aware of the implications of the LEA on the development and its timetable.

9.11.6 Developers should liaise with the Council's Business, Employment and Skills Team when producing the LEA.

Policy ECY03: Local Jobs, Skills and Training

The Council will seek to increase local employment opportunities from development in the Borough by:

- a) Requiring qualifying development to provide a Local Employment Agreement which sets out the skills, employment and training opportunities to be delivered from the development including end use jobs. Financial contributions to offset unfulfilled LEA deliverables may be accepted in exceptional circumstances.
- b) Delivering construction-phase training in conjunction with the Council's recognised providers.
- c) Requiring compliance with other jobs, skills and training requirements of the Council's Delivering Skills, Employment, Enterprise and Training (SEET) from Development SPD (2014) or any subsequent SPDs.

10 Chapter 10 - Environment and Climate Change

10.1 National and London Plan Policy Context

10.1.1 Specific National and London Plan Policies to be taken into account.

NPPF

Section 8 Promoting healthy and safe communities specifically paras 96 to 101

Section 13 Protecting Green Belt land specifically paras 133 to 147.

Section 14 Meeting the challenge of climate change, flooding and coastal change specifically paras 149 to 165.

Section 15 Conserving and enhancing the natural environment specifically paras 170 to, 183.

London Plan, March 2021

Policy GG6 Increasing efficiency and resilience

Policy D13 Agent of change

Policy G1 Green infrastructure

Policy G2 London's Green Belt

Policy G3 Metropolitan Open Land

Policy G4 Open space

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and woodlands

Policy G8 Food growing

Policy G9 Geodiversity

Policy SI1 Improving Air Quality

Policy SI2 Minimising greenhouse gas emissions

Policy SI3 Energy Infrastructure

Policy SI4 Managing heat risk

Policy SI5 Water infrastructure

Policy SI7 Reducing waste and supporting the circular economy

Policy SI8 Waste capacity and net waste self-sufficiency

Policy SI9 Safe guarded waste sites

Policy SI10 Aggregates

Policy SI11 Hydraulic fracturing (Fracking)

Policy SI12 Flood risk management

Policy SI13 Sustainable drainage

Policy SI14 Waterways – strategic role

Policy SI15 Water transport

Policy SI16 Waterways – use and enjoyment

Policy SI17 Protecting and enhancing London's waterways

Mayor of London Sustainable Design and Construction SPG

Mayor of London All London Green Grid SPG

10.2 Introduction

10.2.1 Ensuring a clean, pleasant and well-maintained environment is a top priority of the Council.⁴² Through the implementation of Local Plan policies the Council will manage growth to help deliver this environment as part of its approach to the mitigation of, and adaptation, to climate change. Development can be made more sustainable by measures such as passive solar design, natural ventilation, green and brown roofs and sustainable drainage systems. Details of how this can be achieved are set out in the Council's more detailed planning guidance. Barnet's suite of design guidance SPDs together with the Green Infrastructure prioritise the protection and enhancement of the environment and biodiversity and clarify requirements on the prudent use of natural resources.

10.2.2 This Chapter provides policy guidance on a range of environmental matters including:

- Reducing carbon emissions;
- Environmental considerations including air and noise pollution, flood and water management as well as waste;
- Protecting Green Belt and Metropolitan Open Land;
- Making the best use of Barnet's parks and open spaces; and
- Biodiversity.

10.3 Reducing carbon emissions in new and existing development

10.3.1 The Mayor of London has set a target for London to become a zero-carbon city by 2050. In order to deliver this the Local Plan addresses the level of emissions from the existing building stock, retaining and reusing buildings to avoid the material and energy costs of new development. Creative adaptation can dramatically reduce the whole-life energy costs and waste impacts from demolition and replacement, even where the proposed development would be energy efficient. Where ongoing energy performance is unsatisfactory, there will almost always be scope for suitable adaptations to be made through careful consideration of the most appropriate options for insulation, power use and power generation. Developments unable to meet the carbon targets set by the Mayor of London will need to contribute to the carbon offset fund.

10.3.2 New development in the Borough will be required to consider how the design, layout and building materials can minimise energy requirements and assist in the efficient use of energy. Building design and energy supply options will be required to provide for the building to be retro-fitted to incorporate new technology in the future.

10.3.3 Intrusive interventions, such as micro generation technology, can harm the significance of a heritage asset and local character. Detailed advice on how heritage assets can be adapted to new technologies or materials without harming their significance is available from Historic England.

10.4 Energy Generation

10.4.1 Developers should provide more sustainable and efficient methods of supplying heat and power than traditional energy supply systems. The design, construction and operation of new buildings should be informed by the Mayor's Energy Hierarchy with opportunities for onsite energy and heat production maximised.

10.4.2 The majority of the Borough is within a Heat Network Priority Area⁴³. Developers should ensure that any proposed Heat Networks operate effectively and efficiently while taking into account air quality and the net zero carbon target. Developers should also provide information to the Council on how the system is to be managed, especially if it is not part of a larger network. Residents must be able to easily contact the appropriate persons to raise concerns, and have maintenance and repairs undertaken within appropriate timeframes.

10.5 Carbon Reduction

10.5.1 Developments providing renewable sources of energy for heat and power are an important mechanism of delivering more sustainable development. The Council will encourage all developments to explore possibilities of supplying onsite renewable energy to the homes and business spaces they are creating. All energy related technology used in a development should complement each other and the primary source of energy. The renewable energy technologies chosen should also result in lower carbon emissions than more traditional technologies. All renewable technology provided in a development should also be individually monitorable.

10.5.2 Major and large-scale development should have a net zero carbon target. For minor development efforts should be made to make the fullest contribution to minimising carbon emissions and meet a carbon reduction target of at least 6% beyond the latest Building Regulations and demonstrate how the Mayor's Energy Hierarchy has been used to achieve this.

10.5.3 Major developments should comply with the Mayor's Energy Hierarchy and have reductions in accordance with London Plan Policy SI 2 Minimising Greenhouse Gases. However, this figure is subject to change through the Building Regulations. Developers should utilise the energy hierarchy and renewable technologies such as heat pumps and solar panels to assist them in meeting these targets and maximising opportunities for onsite electricity and heat production.

10.5.4 Major developments should submit energy strategies with planning applications to demonstrate how these targets will be met. Guidance on how to prepare energy strategies is available on the Mayor of London's website. Minor developments should also submit a strategy that is proportional to the development. Further detail is available in the Council's suite of design guidance SPDs.

10.5.5 Where carbon reduction targets are unable to be met onsite a carbon offset contribution will be sought. The value of the offset contribution will be calculated in accordance with the Mayor of London's price of non-traded carbon per tonne.

10.5.6 To enable appropriate assessment of planning applications and that new and refurbished buildings meet the NPPF and London Plan requirements for carbon reduction, applications for development are expected to provide the information detailed in Table 16 below in accordance with the proposal size.

Table 16 Energy use in new buildings requirements

	Development Scale
Proposed development should provide an Energy Assessment which demonstrates compliance with the London Plan energy hierarchy, ⁴⁴ 'cooling hierarchy' the London Plan carbon dioxide requirements and where relevant decentralised energy. The Energy Assessment should be completed in accordance with the GLA Energy Assessment Guidance 2020.	Major, Large scale
Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan energy hierarchy. Developments are expected to achieve carbon reductions 6% beyond Part L from energy efficiency measures to reduce energy demand as far as possible.	Minor
Proposed development to ensure that at least 1 car parking space in 5 (i.e. 20%) is provided with a suitable electrical charging point; with passive provision for the remaining spaces.	Minor, Major, Large scale
Decentralised Energy (DE)	Major, Large Scale
Heat risk assessment	Major, Large scale, Minor - where single aspect units are proposed.

10.6 Barnet's Existing Building Stock

- 10.6.1 Nearly 66% of Barnet's housing stock was built before 1944 (compared to a national figure of 40%). The Building Research Establishment Housing Stock Model⁴⁵ estimates the number of properties with poor insulation as highlighted by the SAP (Standard Assessment Procedure) rating. SAP is the Government's recommended system for energy rating of dwellings based on annual energy costs for space and water heating. The Model highlights that 22,000 properties in the private sector have inadequate thermal comfort and over 14,000 properties had in 2009 a SAP rating of less than 35. The BRE Model showed that households in the west of the Borough were more likely to fail the Decent Homes Standard and be occupied by a vulnerable person. The London Mayor Building Stock Model 2021⁴⁶ demonstrates that the majority of Barnet still has building stock with an Energy Performance Certificate (EPC) rating of either a D or an E. This indicates that the majority of Barnet homes still have level an average (D) or below rating for energy efficiency, However, the London Energy and Greenhouse Gas Inventory (LEGGI)⁴⁷ does report a decrease in the domestic greenhouse gas emissions of 39kt of carbon between 2017 and 2018 for Barnet.
- 10.6.2 Due to its age Barnet's housing stock has a relatively high level of carbon emissions. The Council operates a private sector decent homes programme targeted at vulnerable households, which has seen homes provided with measures to reduce fuel poverty, such as insulation, and improvements to heating systems.
- 10.6.3 However, all the Borough's existing building stock contains embodied carbon, demolishing and replacing existing buildings requires a reinvestment in embodied energy and other resources. Where possible the reuse of existing buildings should therefore be considered. Research undertaken by Heritage Counts has demonstrated that the sympathetic refurbishment, retrofit and/or conversion of historic buildings can result in lower estimated carbon emissions by 2050 than new builds when taking embodied carbon into account. This provides an important argument for the retention of existing buildings in Barnet especially its 2,206 Statutorily Listed buildings and 1600 Locally Listed buildings, as overtime these are likely to need refurbishment and /or retrofit to ensure they continue to be fit for use.

10.7 Choosing Sustainable Locations for Development

- 10.7.1 The location of development and the mix of land uses have a significant effect on the amount of natural resources used for transport and energy for heating and cooling. Policies BSS01 and GSS01 aim to make the best use of previously developed land which can be planned at higher densities and in accessible town centres. These areas will offer exemplary sustainable locations and furthermore, will be planned so as to include high standards of design and construction as set out in the Council's suite of design guidance SPDs.

- 10.7.2 There is a variety of measures which developers can incorporate into their developments to make them more sustainable for example the use of passive solar design, natural ventilation, green and brown roofs, sustainable drainage systems and rainwater systems. Greater detail on these measures can be found in the Council's suite of design guidance SPDs together with the Green Infrastructure SPD. The greening of the built environment provides a significant contribution to climate change mitigation and adaptation. Barnet's green areas contribute to urban cooling and act as Barnet's 'green lungs'. Trees, other green vegetation and soils can act as carbon reservoirs, absorbing and storing carbon over long periods of time. Through measures such as the Urban Greening Factor (London Plan policy G5) and those outlined in the Green Infrastructure SPD, the Council can enhance Barnet's network of green spaces, better understand the ecosystems within the Borough and how these can contribute to reducing the urban heat island effect, and improving resilience to climate change.
- 10.7.3 Barnet values the services trees offer the Borough not only for the amenity and habitat value they provide but also for their ability to assist the Borough in managing the heat island effect and improving air quality, this is set out in the Barnet Tree Policy document. Barnet has the ambitious target of planting 900 trees per annum. Any loss of trees or greenspace for private development will therefore need to be adequately compensated.
- 10.7.4 Other issues that have arisen as buildings have become more heat efficient are the internal air quality and buildings overheating. Overheating has become a significant problem in London due to the higher average temperatures and extreme weather events combining with the urban heat island effect. Policy SI4 of the London Plan addresses this issue and provides a cooling hierarchy for development as part of their required Energy Strategy. An assessment of heat risk and how a proposed development will manage heat risk should accompany major for both non residential and residential development; minor applications should also undertake this assessment if there are single aspect units proposed. Guidance on producing overheating reports is provided by the Chartered Institute of Building Services Engineers.

Policy ECC01 – Mitigating Climate Change

The Council will seek to minimise Barnet's contribution to climate change and ensure that through the efficient use of natural resources the Borough develops in a way which respects environmental limits and improves quality of life. The Council will:

- a) Concentrate growth in the identified Growth Areas and existing town centres in order to better manage the impacts of growth on the climate.
- b) Promote the highest environmental standards for development and through guidance provided in the Council's suite of design guidance SPDs together with the Green Infrastructure SPD will continue working

to deliver exemplary levels of sustainability throughout Barnet in order to mitigate and adapt to the effects of a changing climate.

- c) Expect all development to be energy-efficient and seek to minimise any wasted heat or power and meet the requirements of Policy CDH02.
- d) Development is expected to be in accordance with the Mayor's Energy Hierarchy to reduce carbon dioxide emissions.
 - i) All major development will be required to demonstrate, through an Energy Statement accordance with Part L of the Building Regulations and London Plan policies SI2 and SI3 including compliance with the Mayor's net zero carbon targets.
 - ii) For minor development efforts should be made to make the fullest contribution to minimising carbon emissions and meet a carbon reduction target of at least 6% beyond the latest Building Regulations and demonstrate how the Mayor's Energy Hierarchy has been used to achieve this.
- e) Where Decentralised Energy (DE) is feasible or planned, major development will either provide:
 - suitable connection
 - the ability to connect in future
 - a feasibility study; or
 - a financial contribution to a proposed feasibility study.
- f) All schemes are encouraged to incorporate renewable energy initiatives into development proposals, where feasible.
- g) Expect development to demonstrate how it will manage heat risk in accordance with London Plan Policy SI4.
- h) The Council will support retrofitting existing buildings and encourage solutions that minimise or avoid harm to a heritage asset's significance while delivering improved energy performance or generation.
- i) Where the carbon targets for a development cannot be fully achieved a contribution will be sought to a value calculated using the latest non-traded price of carbon per tonne identified by the Mayor of London.
- j) Developments are required to demonstrate how sustainable design and construction methods are incorporated into the proposal to enable the development to mitigate and adapt to climate change over its intended lifetime.

10.8 Environmental Considerations

10.9 Air and Noise Pollution

10.9.1 Significant housing growth in the Borough involves locations such as along major thoroughfares (Policy GSS11). Within Barnet, emissions from traffic have the most severe and pervasive impact on air quality where air and noise pollution is an issue. The pollutants are produced within the combustion process. The two main air pollutants of concern within the Borough are Nitrogen Dioxide (NO₂) and fine particles (PM₁₀); research has shown the most harmful fraction of these fine particles is PM_{2.5}. Nitrogen dioxide is a toxic gas and fine particulate matter is a mixture of particles and droplets with a diameter of less than 10 (PM₁₀) or 2.5 micrometres (PM_{2.5}). Other significant sources of particulate matter are construction, commercial cooking and wood burning. Barnet is an Air Quality Management Area (AQMA) and an Air Quality Action Plan for Barnet, which is updated annually, has been developed to improve air quality. Consistency with Barnet's Air Quality Action Plan and the Mayor's Environment Strategy⁴⁸ will be important material considerations in assessing proposals.

10.9.2 All major and large scale developments are required to submit an Air Quality Assessment with planning applications and designs for any necessary mitigation proposals. This also applies to minor development for proposals within areas of poor air quality or where development could potentially cause significant harm to air quality.

10.9.3 Applications for major developments will need to include an air quality neutral assessment in accordance with the latest GLA air quality neutral guidance. This shall assess the emissions of the proposed development (buildings and transport) and either compare them to benchmarks or, in the absence of a suitable benchmark, against the previous use. If the benchmark is exceeded or there is an increase in emissions from the previous use then further mitigation measures or a proportional Marginal Abatement Cost (MAC) will be necessary. The abatement measures may be on or off site. If offsite, a payment for the measures could be secured using a Section 106 agreement if the developer is not going to deliver them, The abatement measures should be effective for the pollutant and the cost be proportional to the size of the exceedance. If the abatement measures are insufficient or not possible then a MAC payment will be sought, this will be calculated using the current value or cost for each tonne of the pollutant above the benchmark using the GLA guidance and the DEFRA Air quality appraisal: damage cost guidance⁴⁹. This will be secured through a s106 obligation.

10.9.4 For large scale developments (over 150 units) the site will need to show it is air quality positive and provide assurance through an Aq positive statement at the initial stage of the application in accordance with the GLA guidance.

10.9.5 This method shall ensure that poor air quality in Barnet does not deteriorate further as a result of development.

10.9.6 Developers are also encouraged to consider how the design of public realm and planting schemes can benefit air quality in and around a development.

10.9.7 Table 17 below provides information on the requirements for Air Quality Assessment and the level of detail required, further guidance on air quality is provided in the Council's suite of design guidance SPDs.

Table 17 Air quality requirements

	Development scale
Where development could potentially contribute to a worsening of local air quality an air quality assessment is required.	<ul style="list-style-type: none"> - Minor - Major, Large scale with the potential to increase and/or change road traffic - Commercial or industrial use requiring environmental permitting⁵⁰ - Development proposing a Combined Heat and Power plant or biomass boiler
Developers are to design their schemes so that they meet the Air Quality Neutral emission benchmarks for Buildings and Transport as set out in Mayor of London Guidance. Large scale developments will need to adopt an air quality positive approach.	All major and large scale developments
Developers shall select plant that meets the standards for emissions from combined heat and power and biomass plants set out in Appendix 7 of the Mayor of London's Sustainable Design and Construction SPG	Mixed user major and large scale development proposing a Combined Heat and Power Plant or biomass boiler
Proposals may be required to demonstrate how the development is designed to reduce people's exposure to air pollutants to acceptable levels through an air quality assessment.	Minor, Major, Large scale
Restaurants or other odour emitting premises will be required to locate flues appropriately to avoid nuisance to neighbouring occupiers.	All Class E(b), restaurants, takeaways and other odour emitting businesses and services.
Developers should comply with the minimum standards on construction dust management that are detailed in the Mayor of London's Control of Dust and Emissions During Construction and Demolition SPG providing an Air Quality and Dust Risk Assessment and where necessary an Air Quality and Dust Management Plan	Minor, Major, Large scale
Non Road Mobile Machinery used on construction sites should meet Stage IIIA of EU Directive 97/68/EC and its subsequent amendments as a minimum. Details should be registered at www.nrmm.london/register	Minor, Major, Large scale

10.9.8 Persistent and intermittent noise from sources such as transport movements, commercial usage, mechanical plant and construction as well as people can undermine quality of life. The Council will take into account noise considerations when assessing development proposals. In accordance with the Agent of Change principle as set out in London Plan Policy D13, the Council will also take account of existing noise-generating use in a sensitive manner when new development, particularly residential, is proposed nearby. Agent of Change places responsibility for mitigating the impact of noise firmly on the design of the new development. This also applies to new noise generating development. Consistency with the Mayor's Ambient Noise Strategy as a reference source for understanding noise and identifying best practice will be an important material consideration. The Council will require Noise Impact Assessments for developments likely to generate or be exposed to significant noise. Overheating and air quality requirements will be taken into account when determining internal noise levels where appropriate. All reports are advisable at application stage but are otherwise conditioned. Table 18 below provides information on when noise assessments are required, further guidance on noise quality is provided in the Council's suite of design guidance SPDs.

Table 18 Noise quality requirements

	Development Scale
To help consider noise at a site at an early stage an initial noise risk assessment should assess the Noise Risk Category of the site to help provide an indication of the likely suitability of the site for new residential development from a noise perspective.	Minor, Major, or Large scale developments
A Noise Impact Assessment is required for proposed residential development which is likely to be exposed to significant noise and/or vibration or cause a noise and/or vibration impact. For all noise-sensitive and noise creating developments the council will refer to the standards set out for internal and external noise levels in BS8233 (2014) and to the approach of BS4142:2014 (2019).	Minor, Major, or Large scale developments
The adverse impacts of noise should be minimised, using measures at source or between source and receptor (including choice and location of plant or method, layout, screening and sound absorption) in preference to sound insulation at the receptor, wherever possible.	All development
Any proposed plant and machinery shall be operated so as to ensure that any noise generated is at least 5dB(A) below the background level, as measured from any point 1 m outside the window of any room of a neighbouring residential property. An extra 5dBA penalty is added if the noise has any characteristic features. Plant should also be installed to ensure that no perceptible noise or vibration is transmitted through the structure to adjoining premises.	All development with plant and machinery or activity which potentially has a noise impact

10.10 Contaminated Land

10.10.1 For potentially contaminated land, developers will be required to carry out a Preliminary Risk Assessment (PRA) which will help determine the level of any contamination at a development site. Where necessary, further site intrusive investigations should consider the possible risk to future users of the site construction workers and neighbouring residents, and hazards to ground and surface water quality. Before development can start, planning conditions may require that appropriate remedial measures are agreed with the planning authority and carried out in line with current guidelines, having regard to relevant legislation (Part 2A of the Environmental Protection Act and Contaminated Land Regulations 2012). The developer will be required to provide a Verification Report confirming that the works have been carried out as agreed.

10.10.2 In line with the objectives of the Thames Water River Basin Management Plan the Council aims to improve the quality of water courses in the Borough, including groundwater or groundwater aquifers and to prevent any development which could lead to a deterioration in the quality of water. Plans for the remediation of contaminated land or development which could impact water quality will therefore be carefully assessed in liaison with the water authorities.

10.11 Notifiable Installations

10.11.1 There is one Notifiable Installation within Barnet, the New Barnet Holder Station. This facility is identified because of the large quantities of hazardous substances stored, used or transported. A proposal for redevelopment of the New Barnet Holder Station (Site 21) is in the Schedule of Proposals (Annex 1). Where development is proposed near this installation, the Council will seek the advice of the Health and Safety Executive (HSE) on the potential risk to health and safety of people occupying the proposed development. It will be necessary to keep sensitive development, such as housing, schools or hospitals, at a safe distance from this Notifiable Installation.

10.12 Construction

10.12.1 Building works can be hugely disruptive and cause nuisance in terms of, air quality noise and vibration. They also make a significant contribution to air pollution raising levels of fine particulate matter (PM₁₀ and 2.5). In addition, traffic management, storage and waste can also be problematic. Therefore, all developments should demonstrate compliance with the Considerate Constructors Scheme and Control of Asbestos Regulations. In addition, all sites with potential for any of these impacts are conditioned through a Demolition and Construction Management Plan to demonstrate compliance with current best practice guidance.

10.13 Flood and Water Management

- 10.13.1 Barnet hosts nearly half of the headwater tributaries to the main River Brent (including the Dollis Brook, Silk Stream, Edgware Brook, Deans Brook, Folly Brook, Burnt Oak Brook and Mutton Brook). It also hosts tributaries of the River Lea (Lee) e.g. Bounds Green Brook and Pymmes Brook.
- 10.13.2 This amounts to 14kms of streams and brooks, making the Borough subject to various types of flood risk including flooding from main rivers, ordinary watercourses, surface water, ground water and sewer flooding.
- 10.13.3 The ecological status in the Water Framework Directive for rivers in Barnet is currently 'moderate', with the objective to reach 'good' by 2027 (Thames River Basin Management Plan, 2015). The current condition of rivers is impacted by (but not limited to) urbanisation, polluted surface water runoff, sewerage discharges, domestic misconnections, hard engineered channels, culverts and invasive species.
- 10.13.4 Flood Risk Regulations (2009) together with the Flood and Water Management Act (2010) sets out the Council's responsibilities as the Lead Local Flood Authority (LLFA) to manage local flood risks from surface water, groundwater and ordinary watercourses. However, the Environment Agency maintains a national overview and lead on flood risk from main rivers, coasts and reservoirs.
- 10.13.5 With more frequent and more intense rainfall events the risk of flooding from watercourses and storm water runoff is magnified. Rapid urbanisation (often referred to as urban creep) poses further challenges for surface water flooding due to the increase in hard standing areas, putting huge strain on sewer systems and increasing the risk of sewer flooding. Often during intense storm events, the storm water is received in the foul network causing increased risk of foul sewer flooding which poses health and wider environmental hazards.
- 10.13.6 In order to meet the challenges of climate change and urbanisation, Barnet has developed in partnership with other West London Boroughs a Level 1 Strategic Flood Risk Assessment (SFRA). A Level 2 SFRA has also been undertaken for 18 of the sites identified in Annex 1 of this Plan. These complement the Barnet Local Flood Risk Management Strategy (LFRMS) 2017. Together these documents inform development proposals as set out in Annex 1 and outline the requirements for site-specific Flood Risk Assessments (FRAs) to be carried out by developers across the Borough.

- 10.13.7 The NPPF Sequential Test (paras 155 to 165) should be applied in order to steer new development to areas with the lowest flood risk. The West London SFRA identified fluvial flooding from Dollis Brook, Silk Stream, Pymmes Brook and their associated tributaries as the primary source of fluvial flood risk. The LFRMS identifies 33 Critical Drainage Areas (CDAs) that are the areas within Barnet which are considered to be at the highest risk of surface water flooding. Within these CDAs there are over 18,700 residential properties and 731 non-residential properties. These CDAs have also been ranked and a series of local objectives, measures and actions provided as to how Barnet intends to deliver effective flood risk management. Planning is identified as having an important role to ensure development manages risks appropriately and encouraging surface water management.
- 10.13.8 To ensure these risks of flooding are managed appropriately, the requirements of the NPPF and PPG are met in regards to steering development away from flood prone land, and the predicted impact of climate change is properly acknowledged in the management of flooding across the Borough, an additional layer of flood risk has been introduced to assist developers and planners in assessing the flood risk for sites. The extent of the additional layer of flood risk has been identified using 1% AEP⁵¹ plus 70% climate change fluvial flood extent and the 0.1% AEP RoFSW⁵² flood extent. Fluvial flood extents include the River Brent, Silk Stream, River Lee and their tributaries. If a proposed site is within these flood extents, then a site-specific Sequential Test and a site-specific Flood Risk Assessment will be required
- 10.13.9 In 2015, the Lead Local Flood Authority (LLFA) was made a statutory consultee in planning for all major developments in relation to the management of surface water drainage. As part of this responsibility, the Council is required to ensure that sustainable drainage systems are put in place in accordance with Sustainable Drainage Systems: Non-Statutory Technical Standards. Further guidance on the use of Sustainable Drainage Systems (SuDS), is set out in the Council's suite of design guidance SPDs. All major developments are required to complete a SuDS Assessment.
- 10.13.10 The drainage strategy should aim to achieve greenfield runoff rates (via proposed SuDS measures and ensure that surface water runoff is managed as close to the source as possible. Preference should be given to on-ground sustainable drainage features, aiming to achieve wider ecology and biodiversity benefits.
- 10.13.11 As part of Barnet's Network Recovery Programme (NRP), tree planting using flexible porous surface material has increased water holding capacity of street tree pits, these can now hold significant quantities of flood water. Adoptable road creation on new large-scale development⁵³ presents opportunities to create SuDS and swales around tree and verge planting. Table 19 sets out when sequential tests are required and the expectations in regards to SuDS for differing types of development. Further guidance on flooding and water management is provided in the Council's suite of design guidance SPDs.

Table 19 Flood risk, sustainable urban drainage requirements

	Development Scale
Proposed development will need to demonstrate application of the sequential test and exception test where inappropriate ⁵⁴ development is proposed in areas of flood risk ^{55,56} .	Major and large scale
Proposed development will need to provide a Flood Risk Assessment on the known flood risk potential from all sources of flooding including surface water ⁵⁷ to the planning application site, the risk to others, how it will be managed and taking climate change into account.	All development over 1 hectare in Flood Zone 1 Development in Flood Zone 2 & 3 ⁵⁸ All non householder development in the 1% AEP plus 70% climate change fluvial flood extent and the 0.1% AEP RoFSW flood extent.
Developments will be required to demonstrate how they have considered the London Plan drainage hierarchy (Policy SI13 Sustainable Drainage) and achievement of a maximum run-off rate which is equivalent to greenfield rates (typically 2 litres per second hectare). The Barnet LLFA pro-forma detailing SuDS strategy should be submitted with the application.	Major, Large scale
Developers should consult with Thames Water and confirm that their scheme will not increase the risk of sewer flooding to other properties. Pre-planning enquiries (including sewer capacity confirmation) and Section 106 approvals with Thames Water should be submitted with planning applications.	Major, Large scale
Where planning permission is required for hard surfacing porous materials should normally be used.	Householder, Minor, Major, Large scale

10.14 Water Supply and Quality

10.14.1 Barnet lies within an area that is suffering from ‘serious water stress’, where current or future demand for household water is, or is likely to take a high proportion of the effective rainfall which contributes to supply. According to the Environment Agency’s London Abstraction Licensing Strategy (updated February 2020), there is restricted water available for licensing in the Brent catchment and no water available for licensing in the Lower Lee catchment.

10.14.2 The Borough is served by Thames Water and Affinity Water for mains potable water supplies and by two Sewage Treatment Works (STW), Mogden STW in LB Hounslow and Deephams STW in LB Enfield, both operated by Thames Water. Sewer systems in Barnet are mostly separate surface water and foul water sewers rather than combined.

- 10.14.3 The Council works collaboratively with water companies to deliver adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where an infrastructure capacity constraint has been identified the Local Planning Authority will consider applying phasing conditions to ensure the timely delivery of infrastructure upgrades. All developments are expected to demonstrate that the water efficiency standards set out in Table 20 have been met by submitting a water efficiency calculator report with planning applications.
- 10.14.4 Barnet's main water courses are of fair to poor chemical quality according to the Environment Agency. Water pollution can affect the supply of water for leisure, industrial and agricultural uses and have a harmful impact upon riverside habitats. The Council works with the Environment Agency to restrict development which may threaten the quality of either ground or surface water. There are two groundwater Source Protection Zones in Barnet surrounding public abstraction points, at Mill Hill and between Brunswick Park and New Southgate. Although there are no Water Framework Directive designated groundwater bodies underlying Barnet, there are some secondary A aquifers associated with gravel formations/deposits located within the Borough. It is therefore important to ensure the quality of these aquifers are not degraded.
- 10.14.5 Barnet's three designated water bodies under the Water Framework Directive (WFD) are: the Silk Stream and Edgwarebury Brook; the Dollis Brook and Upper Brent; and the Pymmes Brook upstream Salmon Brook confluence. These are all classified as having moderate ecological potential, with water body objective potential for good status by 2027 according to the 2019 WFD Classification. The Council will work with the Environment Agency and developers to achieve the potential of Barnet's water courses being classified as 'good ecological potential'. This may involve reducing levels of urban runoff and removing invasive species from the water courses. New development must be efficient in using water, seeking wherever possible to reduce consumption as set out in Table 20. This can be achieved through grey water systems and rainwater harvesting. Further details on recommended technologies are set out in the Council's suite of design guidance SPDs.

Table 20 Water efficiency requirements

	Development Scale
New dwellings should be designed to ensure that a maximum of 105 ⁵⁹ litres of water is consumed per person per day. To be demonstrated through a water efficiency calculator report.	Minor, Major, Large scale
Commercial development is required to achieve a BREEAM 'excellent' rating for water efficiency in accordance with Policy SI 5 Water Infrastructure of the London Plan.	Retrofit and New

10.15 Watercourses

- 10.15.1 Barnet's rivers have been hugely altered from their natural state. Culverting of watercourses can exacerbate flood risk, increase maintenance requirements, and destroy wildlife habitats. Hence, the Council strongly discourages any proposals that include any new additional culverting of the watercourses and only considers it, if alternative options have been explored and there is no reasonably practical solution. Wherever possible, rivers and watercourses should be de-culverted and restored to a more natural state in order to improve biodiversity and help reduce the speed of run off. Buildings should not be sited over the top of new or existing culverts/ordinary watercourses. The Council will oppose planning consent for any building over a culvert as the culvert may, in the future, need to be repaired, replaced or upgraded if conditions in the catchment change.
- 10.15.2 Under section 23 of the Land Drainage Act 1991 the Council (as LLFA) is responsible for consenting works that proposes any changes to the ordinary watercourse, altering or obstructing the flow in the watercourse (even temporarily). Developers should contact the LLFA if proposals include any works within 5m of an Ordinary watercourse to ensure if an Ordinary Watercourse Consent is required.
- 10.15.3 All developments adjacent to a river corridor are expected to create a buffer between the water course and the built edge of the development (>10m width is recommended but relevant site constraints will be considered), for instance, tall buildings may need to be set further back to prevent the deterioration of the riverine environment as a result of impacts such as overshadowing, wind and temperature. This will assist with any restoration initiatives and ensure a range of species can be supported by the water course and the riparian edges. Surface water should also be managed as much as possible onsite, any run off that does occur into the water course should be of a quality to assist the water course in being rated 'good ecological potential' as described in the WFD.

- 10.15.4 Therefore all applications adjacent to a river corridor should be accompanied by an assessment of the impacts (including where appropriate the cumulative impacts) of the development on the riverine environment, and wildlife including flood risk, wind, temperature and state how any surface water runoff quality will be improved before it enters into the water course. Buffer zones should include creation of wetland habitat and native planting and have a management and maintenance plan to ensure long term biodiversity gains and create a well-connected habitat within the buffer for the benefit of wildlife. Public accessibility is also important and the ability to link into the wider network of footpaths and cycleways should be considered. Where the recommended set back is not achievable this should be fully justified. Where reduced buffer zones are proposed, additional measures to improve biodiversity proposed on-site such as green spaces, tree planting, sustainable drainage measures or off-site compensation will be required.
- 10.15.5 Tree and shrub planting, delivery of footpaths and cycleways, as well as the removal of hardstanding and fenced-off areas such as car parking or storage will help open up river corridors to public use in the long term, even if initially it only provides outdoor space that benefits residents of the development when it is first delivered it also offers the ability to mitigate and adapt to climate change.
- 10.15.6 The Council wants to open up public access to all river corridors within the Borough to provide strategic green chains and walking routes. An example of this work is the Silk Stream, a segmented and closed-off watercourse in the west of the Borough. In response to growth in the west of Barnet there is an opportunity to create a new strategic green chain and walking route from Edgware to the Welsh Harp (Brent Reservoir). The Council is investing in the Silk Stream Valley Park to improve the river corridor. Further guidance is set out in the Green Infrastructure SPD.
- 10.15.7 The removal of hard structures such as revetments and toe-boards and their replacement with softer engineering features which will help naturalise the river course is encouraged. Where a river cannot be naturalised, this will need to be justified through demonstrating that restoration or de-culverting is not possible or advisable due to significant physical constraints that cannot be overcome, such as safety risks or an increase in flood risk. However, contributions towards improving the riparian corridor would still be sought to ensure that biodiversity along the watercourse was enhanced and run off rates lowered.
- 10.15.8 The Environment Agency has identified action measures for each WFD designated watercourse. The Thames River Basin Management Plan (2015) sets out the objectives to improve waterbodies, developments near rivers and other waterbodies should demonstrate how it will assist in the achievement of these objectives. The London Rivers Restoration Action Plan and associated website (www.therrc.co.uk) also sets out opportunities to restore sections of the River Brent. The Brent River Corridor Improvement Plan 2014 aims to improve and enhance the rivers within the Brent River catchment.

Policy ECC02: Environmental Considerations

The Council expects development proposals:

- a) to improve air quality and ensure:
 - i. where there is a localised source of air pollution, development is designed and sited to reduce exposure to air pollutants.
 - ii. that development is not contributing to poor air quality, providing air quality assessments where appropriate.
 - iii. that where it is demonstrated that on-site provision is impractical or inappropriate and air quality neutrality is not achieved then proportionate, off-site measures to improve local air quality should be considered, provided that equivalent air quality benefits can be demonstrated. Where such measures are insufficient or not possible a MAC payment will be secured through s106.
- b) to avoid generation of unacceptable noise levels close to noise sensitive uses. Proposals to locate noise sensitive development in areas with existing high levels of noise will not be permitted without satisfactory measures to mitigate noise impacts through design, layout, and insulation as set out in the Council's suite of design guidance SPDs. The Council will apply the Agent of Change principle in accordance with London Plan Policy D13.
- c) Development should provide Air Quality Assessments and Noise Impact Assessments in accordance with Tables 15 and 16 together with Barnet's suite of design guidance SPDs.
- d) Proposals on land which may be contaminated should be accompanied by an investigation to establish the level of contamination in the soil and/or groundwater/surface waters and identify appropriate mitigation and remediation opportunities to be incorporated into the development proposal. Development which could adversely affect the quality of groundwater will not be permitted.
- e) Proposals for Notifiable Installations or developments near to existing Notifiable Installations will only be permitted provided that:
 - i. There is no unacceptable risk to an individual's health and safety;
and
 - ii. There will be no significant threat to environmental quality.
- f) All developments should comply with the Considerate Constructors Scheme and comply to the terms of their Demolition and Construction Management Plan which includes further mitigation measures.

Policy ECC02A Water Management Policy

The Council will seek to ensure:

Flood risk

- a). That development delivers a positive reduction in flood risk, from all sources, on and off-site, by demonstrably giving sufficient consideration to this issue from the design stage and during the pre-application process.
- b). That development complies with Table 19 and that:
 - i) any flood defences are maintained, repaired or replaced as appropriate, and realigned or set back where possible to provide amenity and environmental enhancements; and
 - ii) land adjacent to flood defences is protected in order to allow future replacement of defences and provision of public amenity and biodiversity;
- c) A Flood Risk Assessment is undertaken in consultation with the Environment Agency (if applicable) or Lead Local Flood Authority if it is:
 - i. A development site over 1 hectare or greater in size within Flood Zone 1
 - ii. A site within Flood Zones 2 or 3.
 - iii. A site within 1% AEP plus 70% climate change fluvial flood extent and/or the 0.1% AEP RoFSW flood extent
 - iv. Within an identified Critical Drainage Area
- d). Where development impacts flood defences and / or rivers and waterways, and this is not appropriately mitigated for, applicants are required to make a financial contribution to the Council and / or agree off-site provision via planning obligations.
- e). Proposals for vulnerable uses and sleeping accommodation are located away from areas of high flood risk or fluvial 1 in 100 plus climate change flood level.
- f) Where appropriate developers should contribute to the projects set out in the relevant Catchment Partnership Management Plans for the development.

Surface water management

- g). All major development incorporates sustainable drainage systems (SuDS) into proposals, and manage surface water run-off to achieve greenfield run-off rates where feasible and in line with the London Plan drainage hierarchy.
- h). Proposals for minor and householder development incorporate SuDS where applicable. SuDS should be green, provide multiple benefits, such as biodiversity and integrate into the Green Infrastructure network.
- i) Development proposals incorporating SuDS will need to include management and maintenance plans for the proposed SuDS, with appropriate contributions made to the Council where necessary.

j). Any development in a Critical Drainage Area demonstrates that runoff rates meet greenfield (or lower) run-off rates.

Water Infrastructure

k). Major development demonstrates at application stage that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve the development, taking into consideration the cumulative impact of current and proposed development. Should there be capacity issues resulting from development that these can be addressed through upgrades of the sewerage network, developers are required to demonstrate how these will be delivered at the time of commencement of development.

l) Development proposals demonstrate compliance with water efficiency standards set out in Table 20.

Water Courses

m) Development proposals on or close to controlled watercourses naturalise the water course and ensure an adequate buffer zone of at least 10 metres (greater if a tall building is being proposed) and enable public accessibility. Buffer zones should include the creation of the appropriate riparian habitat and native planting and have a management plan to ensure long term biodiversity gains. Contributions towards river restoration and de-culverting will be expected.

n) Buildings are not sited over the top of new or existing culverts/ordinary watercourses.

10.16 Dealing with Waste

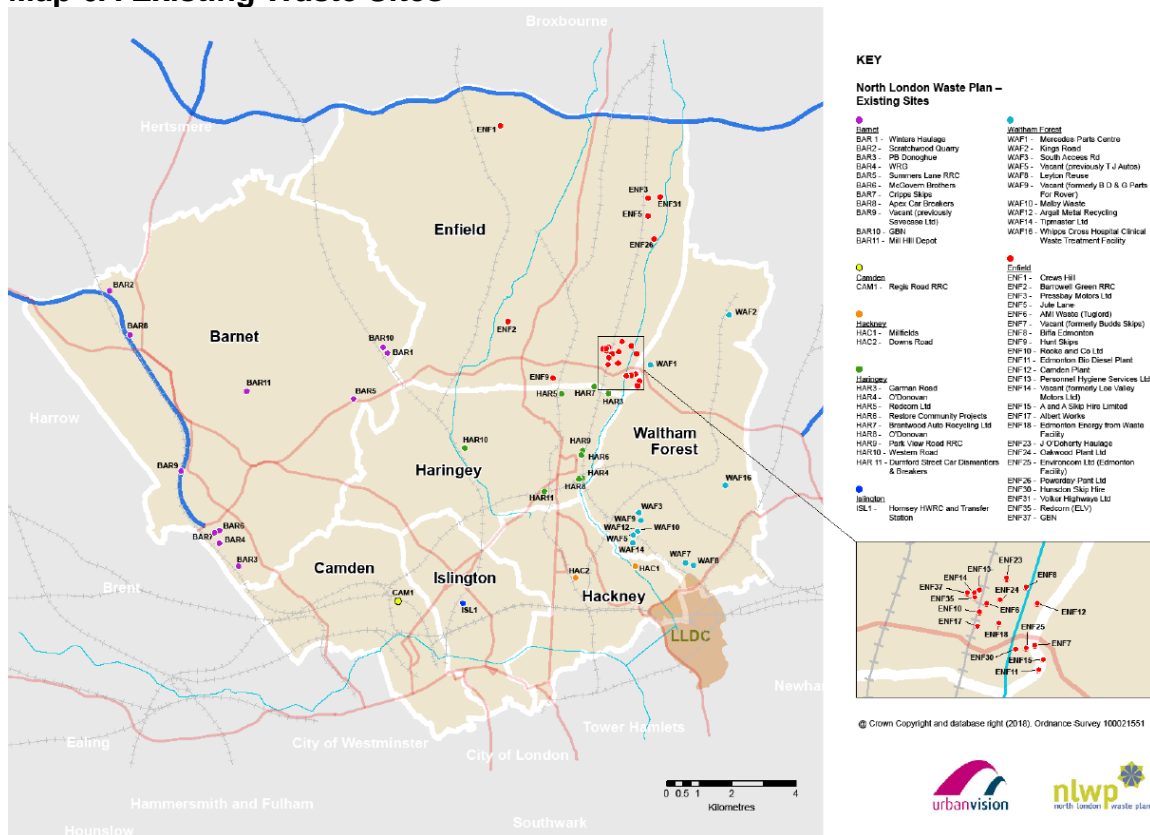
10.16.1 Barnet needs to find better ways of dealing with its waste and taking more responsibility for dealing with it within London rather than sending it to landfill in places such as Bedfordshire. The North London Waste Authority (NLWA) has produced a Joint Waste Strategy which forms the basis for facilitating the provision of new waste management facilities and services, to increase recycling and recovery and divert more waste away from disposal.

10.16.2 The London Plan sets a target of working towards managing the equivalent of 100 per cent of London’s waste within London by 2026. In the London Plan, Barnet has been allocated an apportionment target of 215,000 tonnes of waste per annum in 2021 rising to 229,000 tonnes per annum by 2041. The Council therefore needs to identify sufficient land to provide capacity to manage this waste target and have joined with six other North London Boroughs to produce the North London Waste Plan (NLWP) which will form part of Barnet’s Local Plan. It will sit alongside the North London Joint Waste Strategy to secure the sustainable management of waste. Map 6A shows existing waste sites within Barnet and other authorities within the NLWA area.

10.16.3 As part of the Mayor’s London Environment Strategy, the Mayor of London is promoting a more circular economy that encourages reuse and recycling of resources, meaning that through efficiency and innovation, products and materials are kept in use for as long as possible.

10.16.4 A site has been identified at Scratchwood Quarry to provide additional waste capacity. This is an existing waste management facility with potential to increase the volume of waste processed through more efficient and intensive use of the site.

Map 6A Existing Waste Sites



Policy ECC03 – Dealing with Waste

The Council will encourage sustainable waste management by:

- a. promoting a circular economy through waste prevention, re-use, recycling, composting and resource efficiency over disposal.
- b. requiring developers to submit a Circular Economy Statement in accordance with London Plan Policy SI 7 and the North London Waste Plan.
- c. ensuring development is designed to provide appropriate space for storage and collection of waste and recycling facilities which fit current and future collection practices and targets.
- d. designating sites through the North London Waste Plan (NLWP) to meet an aggregated apportionment target across the seven North London Boroughs. These sites will be the principle locations considered suitable for waste facilities.
- e. safeguarding all existing waste facilities in Barnet, as set out in the NLWP. For any waste site subject to redevelopment for non-waste uses the developer must clearly demonstrate to the satisfaction of the Council that compensatory capacity will be delivered in line with the NLWP spatial framework principles on a suitable replacement site that must at least meet, and, if possible, exceed, the maximum achievable throughput of the site proposed to be lost.
- f. seeking to utilise additional waste capacity at Scratchwood Quarry as set out in the Schedule of Proposals

10.17 Green Infrastructure

10.17.1 As well as new housing, leisure centres, schools and community buildings, the Council is investing in improvements to open spaces and routes connecting them. Green Infrastructure can be defined as a strategic network of green spaces places and features that thread through and surround urban areas and connect town to country it comprises of a wide range of public and private green ‘assets’ including parks, woodland, trees, residential gardens, allotments and waterways. Green Infrastructure provides a range of environmental benefits including flood water storage, sustainable drainage, urban cooling and access to shady outdoor space while assisting in mitigating and adapting to climate change; and can facilitate a natural and healthy environment vital to Barnet’s success as a place to live. It also provides habitats for wildlife and through the creation and enhancement of ‘green corridors’ should aid the natural migration of species responding to the changing climate.

10.17.2 The Green Infrastructure SPD sets out a strategic approach for the creation, protection and management of networks of green infrastructure. Infrastructure should be provided where it will reduce the impact of climate change, improve local ecosystems and habitats and retain, enhance or create green corridors that enable linkages between rural, urban fringe and urban green spaces.

10.17.3 Growth identified in Policy GSS01 will be supported by improved open space provision. This will ensure that Barnet is making the best use of its open space for residents and nature.

10.17.4 In ensuring the best use of parks and open spaces the Council has produced the following documents:

- Green Belt and Metropolitan Open Land Study 2018;
- Playing Pitch Strategy 2017;
- Tree Policy 2017;
- Green Infrastructure SPD 2017;
- Fit and Active Barnet 2016-2020;
- Barnet Parks and Open Spaces Strategy 2016 (BPOSS);
- Health and Wellbeing Strategy 2015-20; and
- Open Space, Sport and Recreational Facilities Needs Assessment 2009

10.17.5 NPPF (para 96) states that planning policies should be based on an assessment of the need for open space, sports and recreational facilities and opportunities for new provision. BPOSS provides the Council with a review of the quality of its parks and suggests a range of opportunities that green spaces offer to enhance the quality of life and economic success of the Borough.

10.18 **Barnet's Green Belt and Metropolitan Open Land**

10.18.1 Barnet is one of the greenest boroughs in London. Green Belt and MOL covers a third of the Borough. MOL is strategic open land within the urban area. The principles of natural Green Belt policy also apply to MOL. In total there are 2,466 hectares of Green Belt and 690 hectares of MOL. This designated land makes a major contribution to quality of life in the Borough. This is reflected in the findings of Barnet Green Belt Study.

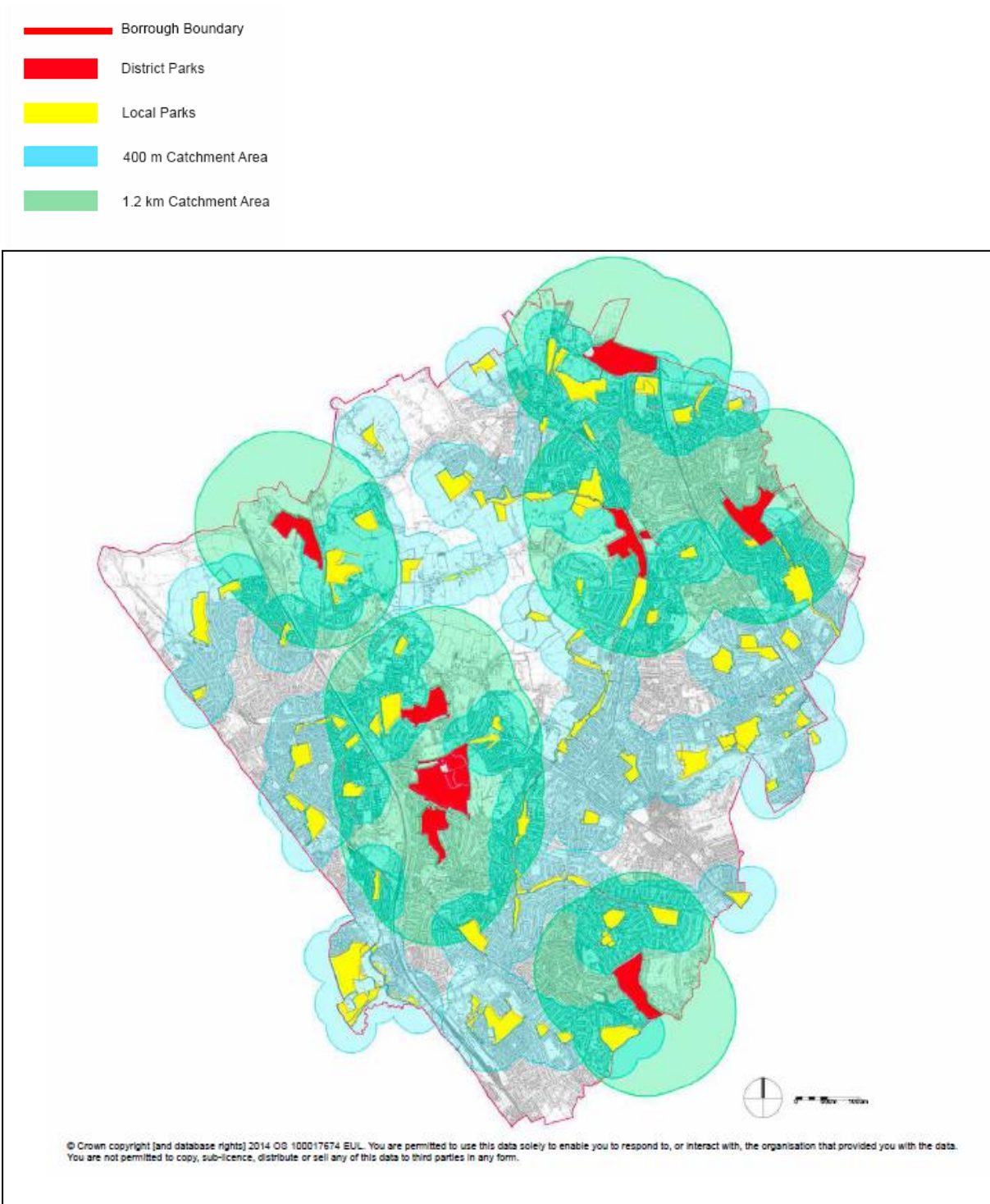
10.19 **Barnet's Parks and Open Spaces**

10.19.1 Barnet has 10 district parks and 77 local parks ranging in size from Hamilton Road Playground (0.04 ha) to Monken Hadley Common (41 ha). These are categorised according to the London Plan public open space hierarchy. Changes to the Policies Map show Barnet's parks and public open spaces. The Schedule of Proposals in Annex 1 highlights new Local Open Space at Whalebones Park which will be designated in accordance with NPPF para 99.

- 10.19.2 Over 100 formal green spaces including public parks, cemeteries and graveyards in Barnet are considered to have historic significance and are listed by the London Parks and Gardens Trust in the London Inventory of Historic Green Spaces⁶⁰.
- 10.19.3 The success and value of an open space network is dependent on three principal factors: the quantity, quality and accessibility of open spaces. Barnet's Open Space, Sports and Recreational Facilities Needs Assessment 2009 applied these factors to the existing open spaces in the Borough to create a standard for Barnet. As highlighted in Chapter 4 Barnet's Growth Areas will be expected to deliver adequate levels of open space in accordance with the standards below. Where a development is in an area of deficiency for publicly accessible open space new open space should be provided in line with these standards:
- Children's play (0.09 hectares per 1,000 residents);
 - Parks (1.63 hectares per 1,000 residents); and
 - Natural green spaces (2.05 hectares per 1,000 residents).
- 10.19.4 BPOSS, in a follow up to the 2009 Assessment, has assessed open spaces around the Borough and identified a number of low quality / low value sites where alternative uses may be a more optimal use of the land and allow investment in other parks.
- 10.19.5 Development on open space will only be permitted where it results in no net loss of equivalent open space or a better quality of provision. Small scale development on open space identified in BPOSS as being of low quality and low value may sometimes be acceptable.
- 10.19.6 The release of low quality, low value open space for development must robustly demonstrate that the criteria set out in Policy ECC04(e) is satisfied and the requirements of Policy ECC06 – Biodiversity are met. Replacement open space should be the same or better quality than that which is proposed to be lost and be provided in the local catchment area to ensure that it does not create further deficiency in public access to open space.

10.19.7 The All London Green Grid Strategy identifies the potential for a Regional Park within the Brent Valley and Barnet Plateau Green Grid Area. The open spaces that can most effectively support a new Regional Park lie within designated Green Belt or Metropolitan Open Land, therefore maximising the long-term benefit of such areas for residents will be the key test for any proposals. Such locations may need accessibility enhancements to unlock their full potential. Improvements to individual parks and open spaces; enhancement of footpath, cycling and bridleway networks; improved green corridors and nature conservation areas will be supported. Improvements to signage, surfaces, lighting and surveillance should all assist in encouraging existing and new residents to make greater use of the local spaces in close proximity to where they live. All developments should also consider how accessibility to open space can be improved through pedestrian and cycle links as well as bus routes where practicable. The Dollis Valley Green Walk and the Capital Ring are strategic walking routes that cross Barnet. To support health and wellbeing aspirations it is an ambition of the borough to increase the number of local and strategic walking routes as well as continuing to protect and enhance the existing public rights of way across the Borough. This is demonstrated in the Barnet Long Term Transport Strategy which introduces the aspiration to create a walking and cycling route referred to as the Barnet Loop.

Map 7 – Public open space deficiency



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10.19.8 Map 7 identifies those areas of the Borough that are deficient in public open space (radii of 1.2km (district parks) and 0.4 (local parks) have a deficiency in both district and local parks).

10.19.9 As a reflection of its topography, Barnet forms part of two Green Grid networks – Lea Valley and Finchley Ridge, and Brent Valley and Barnet Plateau. The All London Green Grid (ALGG) SPG 2012 provides a strategic framework for creating, improving, managing and maintaining high quality Green Infrastructure. The SPG highlights the opportunity for a regional park in the Brent Valley and Barnet Plateau Green Grid Area.

10.20 Children's Play Facilities

10.20.1 There are 50 public parks in Barnet that provide formal play space for children, this equates to 0.5m² of space per child under 15 years. Children should also have access to play space in private residential developments. Children's play spaces should therefore be provided in all new residential development containing flatted schemes with the potential occupancy of 10 or more child bed spaces as set out in the Mayor's SPG Shaping Neighbourhoods – Play and Informal Recreation.

10.21 Playing Pitches and Outdoor Sports

10.21.1 Barnet is relatively well provided for in terms of distribution of playing pitches with 277 pitches covering nearly 160 hectares, with almost the entire Borough being within 1.2km of a playing pitch. The Playing Pitch Strategy (2017) highlights that despite good geographical coverage there is demand for additional provision because of issues related to the quality of the existing pitches (mainly due to poor drainage) and accessibility. The Council has created three strategic sports hubs in the Borough, Chipping Barnet which provides facilities for football and cricket; Copthall which provides facilities for football, cricket, rugby and athletics; and West Hendon which provides facilities for football and tennis. These strategic sports hubs are set to become important destinations for healthy and active lifestyles. Further details on these strategic hubs is set out at Policy GSS13.

10.22 Natural and Semi Natural Space

10.22.1 The Borough contains one Site of Special Scientific Interest (SSSI)– the Welsh Harp (Brent Reservoir) - into which the River Brent and Silk Stream flow. The Reservoir was created in 1835 as a water supply for the canal network and is jointly managed by Barnet and Brent Councils with the Canal and River Trust. As the largest expanse of water in Barnet, it provides an important recreational resource as well as a valuable wildlife habitat. Access to the Welsh Harp (Brent Reservoir) is being improved as part of the regeneration proposals for West Hendon.

10.22.2 The Council seeks to maintain networks of natural habitats by avoiding their fragmentation and isolation and will therefore identify 'missing links' where enhanced or new measures to support biodiversity and nature conservation may be supported as part of proposals. Where no additional open space is being created, the Council will ensure that the development is designed in a way to enable it to replace and enhance biodiversity, ensuring Biodiversity Net Gain. Barnet's suite of design guidance SPDs together with the Green Infrastructure SPD provide further guidance on making provision for biodiversity.

10.23 Trees

10.23.1 Barnet has around 36,000 street trees, the second highest number in London. These trees make an important contribution to the character of the Borough and the quality of life of residents as well as mitigating climate change. The Mayor seeks to utilise Borough Tree Strategies to increase tree cover in London, with 2 million additional trees sought by 2025. Barnet's Tree Policy sets out ambitious targets to plant 900 trees annually focussing primarily on improving air quality, reducing the urban heat island effect and enhancing Barnet's parks.

10.23.2 The Watling Chase Community Forest forms part of Barnet's green infrastructure. Established in 1991, the Forest covers an area of 188 km² and extends from the northern part of Barnet into south Hertfordshire. The aim of the Community Forest as set out in the Watling Chase Community Forest Plan, is to see much of the area under positive and appropriate management by 2025. This will include a substantial increase in trees and woodland achieved through management of existing woodlands and new planting.

10.24 Sustainable Food Production

10.24.1 Barnet's agricultural land and allotments have potential for sustainable food production which can contribute to the economy and healthier lifestyles as well as reduce the number of food miles between producer and consumer. The Outer London Commission highlighted that farms have the potential to play a greater role in the economy of Outer London. The Barnet Allotment Federation lists 44 allotment sites managed by 37 societies in Barnet providing a total of over 4,000 plots⁶¹. Allotments are an important asset within Barnet, providing a wide range of benefits including protecting open space and providing leisure and exercise as well as healthy low cost food production for communities and benefiting the environment and biodiversity.

- 10.24.2 The Council recognises the benefits for health, learning and community cohesiveness as well as Barnet's local landscape from making better use of land for food growing. The Council therefore supports allotments and is keen to promote sustainable local food production given the Borough's significant and well used allotment holdings and extensive former agricultural lands. In addition to supporting allotments and the utilisation of agricultural land the Council encourages food growing initiatives within local schools as part of the promotion of sustainable food production. The Council will encourage developers to provide space in new developments for food growing.

Policy ECC04 –Barnet's Parks and Open Spaces

- a). As Barnet grows there is a need to optimise the benefits that open spaces can deliver, ensuring that as well as being family friendly, they consider all users and create a greener Barnet, the Council will work with its partners to improve Barnet's Green Infrastructure by:
 - i. managing and enhancing open spaces, including Green Belt and Metropolitan Open Land to provide improved accessibility;
 - ii. promoting a new Regional Park within the Brent Valley and Barnet Plateau Green Grid Area; and
 - iii. ensuring positive management of Green Belt, Metropolitan Open Land and open spaces to provide improvements in overall quality and protection of character and historic significance.
- b). The Council will meet increased demand for access to open space and opportunities for physical activity, by tackling deficiencies and under provision through:
 - i. securing improvements to open spaces, including provision for children's play, sports facilities and better access arrangements (both into parks and between them), where opportunities arise, from all developments that create an additional demand for open space. Where this is not viable, a cash in lieu payment will be required for off site provision or enhancement to open spaces that are nearby;
 - ii. improving access to open spaces particularly in areas of public open space deficiency identified by Map 7. The Council will seek to improve provision in these areas of deficiency in accordance with the following standards :
 - Parks (1.63 hectares per 1,000 residents)
 - Natural green spaces (2.05 hectares per 1,000 residents).
 - iii. maintaining and improving the greening of the environment through the protection of incidental greenspace, trees, hedgerows and watercourses, especially where this enables green corridors to link Barnet's rural, urban fringe and urban green spaces.
 - iv. enhancing local food production through support for community food growing, the protection of allotments, and the provision of opportunities for growing food in new developments.
- c). In supporting provision of new Green Infrastructure the Council will work with neighbouring authorities as part of the All London Green Grid

- to establish Area Frameworks as the basis for identification, creation and management of new green spaces as part of:
- i. Lea Valley and Finchley Ridge Green Grid Area; and
 - ii. Brent Valley and Barnet Plateau Green Grid Area.
- d). The Watling Chase Forest Plan will be taken into account when assessing development proposals in the area covered by Watling Chase Community Forest helping it become a readily accessible 'green lung' for Barnet's residents.
- e). In areas that have been assessed by the Barnet Parks and Open Spaces Strategy as being of low quality and low value the Council will consider limited development on open spaces. The Council will require any proposal that involves the loss of low quality and low value open space to robustly demonstrate that the following criteria can be satisfied:
- i. the development proposal is a small scale ancillary use which supports the improved use of the open space; and
 - ii. that opportunities to improve the quality and value of the existing space have been explored and subject to viability assessment; cannot be delivered to enhance the quality and value of the existing space; or
 - iii. Equivalent or better quality open space provision will be delivered. Any permissible exception will also need to ensure that it does not create or exacerbate any existing public open space deficiency and has no significant impact on biodiversity.

10.25 Green Belt / Metropolitan Open Land (MOL)

10.25.1 The Barnet Green Belt and Metropolitan Open Land Study shows that the majority of Barnet's Green Belt performs well and that all existing areas meet one or more of the purposes of Green Belt set out in the NPPF. The vast majority of the MOL is considered to be open and maintaining and protecting the functions, green links and other features it contains. Although, there are buildings within the MOL these support the use of the MOL as open space and do not impact on the openness to such a degree to warrant any land being removed from the MOL.

10.25.2 One of the purposes of the Barnet Green Belt Study was to identify mapping irregularities with regard to land designated as Green Belt / MOL. This helps create strong defensible boundaries and ensures consistency with the NPPF and the London Plan. Minor adjustments have been made to Green Belt and MOL boundaries where inconsistencies and errors have been identified. The majority of these are mapping errors where the boundary did not match existing property or road boundaries. These adjustments are shown in the Changes to the Policies Map document.

10.25.3 Through continued positive management of Barnet's Green Belt and MOL the Council is working to ensure improvements to its overall quality and accessibility.

10.25.4 This aspiration of improvement and accessibility can be achieved through appropriate development in Green Belt or MOL (as supported by the NPPF and the London Plan. Development adjacent to areas of Green Belt/MOL needs to comply with Policy ECC05 and should respect the character of its surroundings and the visual amenity of these areas. When assessing the likely impact on the openness of the Green Belt the Council will have regard to the visual impact of a development, its duration and prospects for remediation as well as the degree of activity such as traffic that is likely to be generated.

Policy ECC05 - Green Belt and Metropolitan Open Land

a) Green Belt

- i. Any proposals for development in Green Belt will be considered in accordance with NPPF paras 133 to 147.
- ii. Development adjacent to Green Belt should not have a significant detrimental effect on the openness of the Green Belt and respect the character of its surroundings.

b: Metropolitan Open Land (MOL)

- i. In accordance with London Plan Policy G3, Metropolitan Open Land is to be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.

10.26 Biodiversity

10.26.1 Barnet has a wide range of different habitats that have been recognised as Sites of Importance to Nature Conservation (SINCs) including

- Woodland
- Grassland/Acid Grassland/ Pastures and Meadows
- Streams, lakes and ponds
- Wetlands and Bogs;
- Ancient Hedgerows and Trees; and
- Veteran Trees

10.26.2 The Welsh Harp (Brent Reservoir) is designated as a Site of Special Scientific Interest (SSSI) as it is an important refuge and breeding site for waterfowl and other birds.

- 10.26.3 However, this does not imply that the areas of Barnet that have not been recognised for their importance to nature have little or no value. The needs of wildlife and the value of natural vegetation should be considered throughout the planning process. It is particularly important that opportunities be taken to preserve, enhance or create areas of natural water and vegetation within heavily built-up areas, as these can assist the Borough adapt to a changing climate while providing access to access to natural areas for residents. The Council will utilise the Climate Change Adaption Manual⁶² and the Greenspace Information for Greater London (GiGL) database to identify areas of the Borough that can have their ecosystem value improved providing climate resilience, habitat enhancement and access to nature for residents.
- 10.26.4 Barnet is fortunate in having space that consists of contiguous private gardens. Suburban gardens are considered to be of great value to nature and may even be the most important habitat in a neighbourhood. Parts of the Borough that have large and well established gardens with mature trees, shrubs, water features and other habitats are particularly important for nature in urban settings, but such features can also occur in small gardens, especially where neighbours work together to create or maintain links between gardens such as hedgehog highways. New developments should seek to link into such networks to ensure that linkages are improved as a result of a site being redeveloped.
- 10.26.5 The recognised sites of importance to nature together with the public parks and suburban gardens of Barnet provide the Borough with the opportunity to create green corridors for wildlife that also function as ecological networks. Green corridors are relatively continuous areas of open space leading through the built environment and which may link SINC sites to each other and to the Green Belt. Often consisting of railway embankments and cuttings, roadside verges, canals, parks, playing fields, residential gardens and rivers, they should allow wildlife to move through an area and ensure the habitats do not fragment further. The Council will use the Mayor of London's Green Infrastructure maps and tools ⁶³ to identify both existing and potential green corridors across the Borough.
- 10.26.6 Development proposals should consider any impact on areas designated for nature conservation, protected species and habitat/species prevent loss and provide mitigation to these areas as well as providing opportunities to create or improve habitat and linkages for wildlife.

- 10.26.7 The London Environment Strategy identifies important habitats and species and sets out targets for improvements in both quality and quantity. It also sets out priority species which are nationally rare species of conservation concern and are found in London. These are categorised under birds, fungi, invertebrates, vertebrates and plants. The Council will favour the provision of habitats for species identified in the SINC citations and London's Biodiversity Action Plan. Within Barnet, the main specially-protected species that are likely to be encountered are bats, great crested newts, grass snakes, the common lizard and slow worms. Other species that are under threat, for example, hedgehogs and swifts should also be considered for habitat enhancement. Future studies may identify other species in need of additional support.
- 10.26.8 Invasive species such as Japanese Knotweed and Giant Hogweed have been found in Barnet's watercourses. The Council will work with our existing partnerships, the Mayor, neighbouring boroughs and developers to develop and implement an approach to eradicate such species from the waterways.
- 10.26.9 The Environment Bill, which is expected to be enacted towards the end of 2021 requires all development for which planning permission is granted to provide at least a 10% increase on the pre-development biodiversity value of the onsite habitat. This is being referred to as Biodiversity Net Gain (BNG). The Biodiversity Metric 2.0 is the current method for calculating BNG, this may change in the regulations that are intended to accompany the Environment Act legislation,
- 10.26.10 The Council will seek the standards as set out in that policy to be met on site. Where this is proven not to be possible there will be a requirement for the proportion not delivered on site to be provided offsite at a location that benefits the Borough agreed with the Council. A developer must demonstrate consideration of BNG as an integral part of the design of the development, with an understanding of their wider ecological context from the outset, rather than as an afterthought. All development is required to make a positive contribution to biodiversity in Barnet. Therefore, a Biodiversity Net Gain Plan should be submitted with planning applications to enable them to be assessed as part of the planning application process.
- 10.26.11 The London Plan has introduced the Urban Greening Factor as a generic model to determine the appropriate provision of urban greening in new major developments. Further details are set out in London Plan Policy G5. It is expected that developers will combine the requirements of the Urban Greening Factor with the BNG. For instance, if planting is to be provided for the Urban Greening Factor, that it will be of benefit to local wildlife and not simply ornamental.

10.26.12 Policy CDH08 states that development proposals should retain existing wildlife habitat and trees for amenity and biodiversity, where appropriate a survey will be required to determine the significance of that interest. Table 21 provides requirements for biodiversity and habitat quality and the Green Infrastructure SPD provides more detail for design and construction principles for the protection and enhancement of biodiversity and habitats within Barnet.

Table 21 Biodiversity and habitat quality requirements

	Development Scale
<p>All development proposal should provide as part of a submission a baseline ecological assessment and clearly demonstrate BNG based on this assessment. The scale of development will determine the level of detail required. This statement should demonstrate how protection of biodiversity and habitat quality will be achieved and provide the level (%) of BNG improvement that will be achieved onsite as well as recommendations on where enhancements to biodiversity can be made onsite.</p> <p>Where a development is unable to achieve the appropriate level of BNG an offsite contribution equivalent to the deficit % will be agreed with the Council.</p>	All
<p>S106 obligations will be sought for monitoring of BNG for developments major and above. Minor and householder developments will have BNG managed through conditions.</p>	Major, Large Scale

10.26.13 Nature conservation sites are identified in a hierarchy of importance and Table 22 identifies the sites designated in Barnet:

1. Sites of Special Scientific Interest (SSSIs) are of national importance;
2. Sites of Metropolitan Importance are of London-wide significance;
3. Borough Grade Sites of Importance for Nature Conservation (SINCs) are significant in a Barnet-wide context (albeit that they are sub-divided, on the basis of their quality, into two grades); and
4. Sites of Local Importance are of particular value to nearby local residents and schools because they are designated in areas deficient in wildlife sites.

10.26.14 Barnet's rivers have been significantly altered from their natural state. The Council will pursue opportunities to enhance the biodiversity, water quality and amenity value of Barnet's waterways, in particular the River Brent, Silk Stream, Dollis Brook and Pymmes Brook. Opportunities for restoration including opening culverts and naturalising river channels will be explored.

Table 22 Sites of Importance for Nature Conservation in Barnet

Sites of Special Scientific Interest	
<ul style="list-style-type: none"> • Welsh Harp (Brent Reservoir) 	
Sites of Metropolitan Importance	
<ul style="list-style-type: none"> • Hampstead Heath • Hadley Green • Edgware Way Rough • Rowley Green Common (<i>Local Nature Reserve</i>) 	<ul style="list-style-type: none"> • Mill Hill Substation Pastures • Totteridge Fields and Highwood Hill • Scratchwood (<i>Local Nature Reserve</i>) • Arrandene Open Space & Feather stone Hill
Sites of Borough Importance-Grade I	
<ul style="list-style-type: none"> • Coppett's Wood and Scrubland (<i>Local Nature Reserve</i>) • Glebe Lane Pastures • The Folly Brook and Darlands Lake (<i>Nature Reserve</i>) • Glebelands (<i>Local Nature Reserve</i>) • Monken Hadley Common • The Upper Dollis Brook 	<ul style="list-style-type: none"> • Oak Hill Woods (<i>Local Nature Reserve</i>) • Totteridge Croft Field (or Dell's Down Acre) • Big Wood and Little Wood (<i>Local Nature Reserve</i>) • Mill Hill Golf Course
Sites of Borough Importance- Grade II	
<ul style="list-style-type: none"> • Sulloniacs Pastures • Edgwarebury Brook • Deans Brook • Mill Hill Old Railway (<i>Nature Reserve</i>) • The Silk Stream and Burnt Oak Brook • Moat Mount (<i>Local Nature Reserve</i>) and Mote End Farm • Bruno's Field • Totteridge Common • The Mill Field • Copthall Railway Walk and Copthall Old Common • Drivers Hill • Burtonhole Lane and Pasture 	<ul style="list-style-type: none"> • Ashley Lane • King George's Field • Totteridge Green • Northern Line Railway Embankment, High Barnet • Lower Dollis Brook • St Pancras and Islington Cemetery • North Middlesex Golf Course Ponds • New Southgate Cemetery • Pymme's Brook • Rowley Lodge Field • Arkley Lane and Pastures • Arkley South Fields • Turners Wood
Sites of Local Importance	
<ul style="list-style-type: none"> • Clay Lane • Grahame Park • Sunny Hill Park • Barnet Countryside Centre • Bell's Hill Burial Ground • Clitterhouse Playing Fields • Avenue House Grounds • East Finchley Cemetery • The Mutton Brook • Greenhill Gardens • Friary Park 	<ul style="list-style-type: none"> • Oakleigh Park Rail Cutting • Cherry Tree Wood • College Farm • Prince's Park • Lakeside Nature Reserve • Hendon Park & Northern Line Rail Cutting • Edgwarebury Park • Woodridge School Nature Reserve • Barfields Allotments Nature Park • Belmont Open Space, Cockfosters • Copthall South Fields

Policy ECC06 - Biodiversity

The Council will seek the retention and enhancement, or the creation of biodiversity in development proposals by:

- a) protecting existing Site of Special Scientific Interest, Sites of Importance for Nature Conservation, and priority habitats and species according to the NERC 2006 and working with partners including the London Wildlife Trust and the Brent Catchment Partnership to improve protection and enhancement of biodiversity in Barnet;
- b) ensuring that the requirements of the Green Infrastructure SPD are met;
- c) ensuring development adjacent to or within areas identified as part of the Green Grid Framework makes a contribution to the enhancement of the Green Grid;
- d) ensuring that development makes the fullest contributions to enhancing biodiversity and protects existing site ecology. To realise this aim it is expected that at least the required level of biodiversity net gain, stated by regulation, is attained. This should be achieved both through on-site measures and where necessary by contribution to local biodiversity improvements. Consideration of how this will be achieved should be detailed at the start of the development process;
- e) placing emphasis on measures that enhance and support biodiversity in meeting the Urban Greening Factor and SUDs delivery; and
- f) supporting opportunities that facilitate river restoration and floodplain habitat restoration, in particular for the River Brent, Silk Stream and Pymmes Brook (See Policy ECC02).

Where adverse impacts from development on biodiversity cannot be avoided measures must be taken to ensure that they are appropriately managed so as to reduce and /or mitigate any disturbance to wildlife as appropriate. These measures should be included as part of a planning application and a monitoring schedule agreed at the time of planning permission.

For major applications S106 obligations will be sought for monitoring of BNG

11 Chapter 11 - Transport and Communications

11.1 National and London Plan Policy Context

11.1.1 Specific National and London Plan Policies to be taken into account:

NPPF

Section 9 Promoting sustainable transport specifically paras 102, 103, 104, 105, 106, 107, 108, 109, 110, 111.

Section 10 Supporting high quality communications specifically paras 112, 113, 115, 116.

London Plan

Policy GG3 Creating a healthy city

Policy D13 Agent of change

Policy SI6 Digital connectivity infrastructure

Policy T1 Strategic approach to transport

Policy T2 Healthy streets

Policy T3 Transport capacity, connectivity, and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T6.1 Residential parking

Policy T6.2 Office parking

Policy T6.3 Retail parking

Policy T6.4 Hotel and leisure uses parking

Policy T6.5 Non-residential disabled persons parking

Policy T7 Deliveries, servicing and construction

Policy T8 Aviation

Policy T9 Funding transport infrastructure through planning

11.2 Introduction

11.2.1 Providing sustainable, effective and efficient travel services and facilities across the Borough is essential to delivering successful growth in Barnet, ensuring that economic prosperity is maintained and enhanced while improving air quality and the health of residents. Chapter 2 sets the scene for the transport issues faced by Barnet with Map 1 showing the present levels of public transport accessibility. Poor transport accessibility and barriers to movement are major inhibitors to growth. This makes investment in orbital links a priority. Both Barnet's Long-term Transport Strategy and the Local Implementation Plan (LIP) highlights opportunities for improving these as part of the Borough's regeneration schemes and through long term approaches to improving strategic transport infrastructure. Further details of these improvements and the long term vision for transport are set out in Barnet's Long Term Transport Strategy, Growth Strategy and the Infrastructure Delivery Plan.

11.2.2 COVID19 has had a major impact of the use of public transport across Barnet due to the requirement for people to stay home and local where possible.

11.2.3 Fewer journeys by public transport has a consequential impact on revenue to transport bodies such as Transport for London. The long term impact of this loss of income is likely to result in a decrease in an amount of funding available to Boroughs for improvements to the public transport and road network. Barnet will continue to work with TfL, the neighbouring boroughs and developers to ensure necessary works are carried out to ensure the transport policies set out in the London and Barnet Plans are delivered.

11.2.4 A key objective of Barnet's Long-term Transport Strategy is that "Transport in Barnet keeps the borough moving, enabling people and goods to move within and beyond the borough efficiently using high quality orbital and radial links." The ability of people and goods to move around the Borough is vital for the continued social and economic wellbeing of the Borough. Environmental wellbeing will also be achieved through less congestion and the promotion of modal shifts in transport, for instance from private vehicles to more sustainable forms of transport.

11.3 Barnet's Public Transport Network

Existing Network

11.3.1 Barnet is served by national rail lines providing suburban services in the east and west of the borough, and main line services in the west. The two branches of the Northern Line serve the Borough (including a shuttle service to Mill Hill East). The Jubilee and Piccadilly lines and national rail lines pass to the west and east of the Borough respectively.

11.3.2 Several stations within Barnet currently benefit from Step Free Access, however the Council is working with TfL and National Rail to increase the number further. There are currently plans to make improvements at four stations to provide step free access: Brent Cross, Colindale, Burnt Oak, and Mill Hill Broadway. The new station at Brent Cross West will also be fully accessible.

11.3.3 These rail and underground services cater for radial travel into London, but public transport options for other trips are more limited. The bus service is the only public transport option available for orbital trips and public transport links to destinations north of the Borough are also limited. As set out in the Barnet Long Term Transport Strategy (BLTTS), the Council will encourage and support TfL to deliver improvements to the bus network in Barnet.

11.3.4 The bus network enables people to move both radially (north-south) and orbitally (east-west) across the Borough. In general bus journeys in Barnet are slower than car journeys, even when the time taken to park is taken into account. The report *The Impact of Congestion on Bus Passengers*⁶⁴, has warned that road congestion has increased bus journey times by 10% each decade. The report concludes that if bus journey times continue to decline at their current rate, bus passenger numbers will decline by 14% every ten years, putting the future of the bus sector under threat.

11.3.5 This reduction poses a serious threat to the ability of Barnet residents to move east-west across the Borough. The use of the North London Line, which has seen a fivefold increase in passengers since 2007⁶⁵, shows how important it is for Londoners to travel across outer areas of London rather than just radially into and out of Central London. For Barnet to achieve a reduction in dependence on private vehicles, orbital travel needs to be improved by investment in public transport, walking and cycling.

11.3.6 The improvement of orbital travel for Barnet is a focus of the Barnet Long Term Transport Strategy (BLTTS). The document provides detail on the options for orbital travel including improving the speed of the bus network through bus prioritisation initiatives and rapid transit buses; and improvements to the cycle network.

11.3.7 As development comes forward in the Borough this will also increase the dependence on the Northern Line raising concerns of overcrowding and the need to ensure that passengers will be able to board the trains at stations along both northern branches of the Northern Line. Issues with the Camden Town junction of the line where both branches converge also needs to be addressed.

11.4 **Proposed Changes to the Public Transport Network**

11.4.1 In Opportunity Areas such as Brent Cross and Colindale and around development opportunities presented by public transport nodes such as Finchley Central and Edgware the Council is seeking to deliver improved public transport services and facilities. Improved bus provision (in terms of configuration as well as capacity) will play a key role in meeting the transport needs of residents. New and extended bus services are being pursued through the Brent Cross and Colindale regeneration schemes, including better links between the two areas. This is additional to the new station at Brent Cross West being promoted and delivered by the Council.

11.4.2 Plans are currently being prepared by TfL to replace the existing Colindale Station with a new station to meet the needs of the growing population as well as provide step-free access. The new station is being funded by contributions from the Peel Centre development as well as the Council and TfL.

11.4.3 **West London Orbital (WLO)** is a new London Overground line (formerly known as the Dudding Hill Line) connecting Hounslow with Cricklewood and Hendon via Old Oak, Neasden and the new station at Brent Cross West. WLO is supported by the Mayor's 2018 Transport Strategy as well as the West London Alliance (WLA) group of Local Authorities. The Council is fully supportive of this initiative and is working with the Mayor of London, Network Rail and other partners to ensure that the new station at Brent Cross West is capable of accommodating the necessary interchanges.

11.4.4 **Crossrail 2** is a proposed new railway line serving London and the South East, linking Surrey to Hertfordshire via Central London destinations. A new Crossrail 2 station remains proposed at New Southgate and will be located at the end of the New Southgate branch. Crossrail 2 train infrastructure maintenance depot and stabling is planned to be located on Oakleigh Road South and a tunnel portal to the south of the station. The land at Oakleigh Road South, (currently identified as a Locally Significant Industrial Site (LSIS)) remains safeguarded for Crossrail 2 and this safeguarding is reflected in the Local Plan Policies Map (see the Changes to the Policies Map document). New Southgate Station is on the boundary with LB Enfield and as such the boroughs will work together to ensure the station upgrade and subsequent regeneration of the area as an Opportunity Area (as identified in the London Plan) is coordinated and benefits both existing and new residents.

11.5 Sustainable Transport

11.5.1 The overarching objective for the Mayor of London's Transport Strategy is for 80% of all trips in London to be on foot, by cycle or public transport by 2041. For this to be achieved across London the Mayor of London has set targets for each Borough to increase the proportion of trips made by walking, cycling and public transport, for Barnet the target is to increase the proportion from 59% today to 72% in 2041. The BLTTS discusses the options to encourage an increase sustainable travel in the Borough.

11.5.2 Promoting a sustainable passenger and freight transport network is therefore essential to ensuring the delivery of sustainable development in the Borough. The BLTTS will ensure that further public transport schemes are brought forward to support sustainable and active travel. A more efficient transport system will minimise congestion and pollution in the Borough thereby assisting in improving air quality and the implementation of the Mayor of London's Healthy Streets Approach.

11.6 Walking and Cycling in Barnet

11.6.1 Walking and cycling are transport modes that the Council is keen to promote due to the many benefits they provide ranging from reducing the use of private cars with consequent improvements for air quality to a more active and healthy population that increased walking and cycling leads to in terms of the health benefits for the individuals derived from partaking in exercise.

11.6.2 Walking is an important mode of travel for short journeys (31% of all trips⁶⁶), and Barnet's network of town centres makes walking a convenient way for many residents to access services in the Borough. Cycling is becoming a more important transport mode in Barnet. Low take-up (1% of all trips ^{ibid}) has historically been associated with the topography of Barnet and its rolling landscape of valleys and ridges. The advent of electrical cycles (or e-cycling) may assist in encouraging residents to take up cycling as these require less physical effort from the cyclist. The Sub Regional Transport Plan for London 2016 update reports that there has been a growth in cycle trips in Barnet. The Barnet LIP strongly supports the delivery of attractive and accessible cycle links especially in development areas, as does the BLTTS. The BLTTS identifies the provision of safe routes and cycle parking as being vital to increase the number of cycle journeys in the Borough.

11.6.3 The London Plan (Policy T2) sets out Transport for London's (TfL) Healthy Streets Approach. This consists of 10 indicators of a healthy, inclusive environment in which people choose to walk, cycle and use public transport. The Council is committed to delivering Healthy Streets in Barnet and will require new developments and public realm schemes to deliver improvements against the Healthy Streets Indicators.

11.6.4 Chapter 10 – Environment and Climate Change encourages the improvement and extension of existing off road recreational routes through green spaces and refers to work to develop Area Frameworks as part of the All London Green Grid. This work will incorporate proposals for the improvement of the existing strategic walks and other links including cycling routes.

11.7 Promoting Active Travel and Improving Health

11.7.1 Active travel through walking and cycling can play an important part in increasing levels of activity to address poor health. Policy CHW02 sets out how the Council will work with partners on locating health services where access can be improved, particularly for those vulnerable groups with physical or sensory impairment. Good quality walking surfaces and off-road cycle routes can assist in making walking or cycling a more feasible option for some people, including children on their way to and from school.

- 11.7.2 Poor air quality, which is concentrated around major roads in Barnet, has particular impacts on health, particularly with people suffering from cardiovascular and respiratory diseases. The Council is working to improve air quality near schools on these major roads. Reducing discretionary car use, particularly for short car journeys will be key to improving air quality. The BLTTS also recognises that by encouraging sustainable and active forms of travel this will provide benefits for air quality.
- 11.7.3 The Mayor's Transport Strategy discusses the benefits of utilising incentives (such as road charges) to encourage people to make the modal shift in the area identified by the Ultra Low Emission Zone (ULEZ) to improve air quality. From October 2021, land south of (but not including) the North Circular (A406) will be included⁶⁷ and any petrol or diesel vehicle within this enlarged ULEZ area will also need to meet new tighter emissions standards or pay a daily charge.
- 11.7.4 Accident rates in Barnet have fallen dramatically since 2000 (98 people were killed or seriously injured in road traffic accidents in the Borough in 2014 compared with 261 in 2000⁶⁸) but the rate of decline has now slowed. As set out in the LIP, Barnet will seek to achieve the Mayor's Vision Zero ambition of zero killed or seriously injured road traffic casualties by 2041.
- 11.7.5 The Council will seek to ensure that any new transport interchanges are designed and improvements to existing interchanges made to help address personal safety issues and reflect Secured by Design principles. Well maintained streets and town centres with convenient road crossing facilities will allow pedestrians to move around safely and assist in achieving the Mayor's Vision Zero.
- 11.7.6 Transport modelling and assessments of proposed developments should therefore demonstrate that there will be no negative impact to the highway safety or the functioning of the road network as a result of the proposal. Where negative impacts are identified remedial actions would need to be identified and agreed by the relevant agencies in order to make to development acceptable.
- 11.7.7 The Council will ensure that School Travel Plans (STPs) in Barnet are an effective tool for helping to manage air quality. They should include ambitious targets for walking and cycling. They will also ensure that remedial measures are taken if STP targets are not met and encourage the dissemination of good practice among the Borough's schools. It will also take positive action to prevent any pupil parking, promoting car sharing, providing safe cycle routes and improved cycle parking facilities, and will encourage more children to walk and cycle to and from school. This is reflected in the BLTTS which seeks to identify healthy routes to schools which will complement the STPs.

11.8 More Environmentally Friendly Transport Networks

- 11.8.1 Traffic is a significant contributor to poor air quality in Barnet with the highest levels of oxides of nitrogen and particulates concentrated around major roads. The Mayor of London promotes the Healthy Streets Approach to ensure a modal shift away from the private motor vehicle to more sustainable modes such as public transport, cycling and walking. This should improve Londoners health through improved air quality and encourage increased physical activity.
- 11.8.2 The BLTTS has identified proposals that will improve the pedestrian and cycling networks in Barnet including identifying routes through the borough's greenspaces. One such proposal referred to as the Barnet Loop could extend the Silk Stream Valley Greenwalk and Dollis Valley Greenwalk, creating a 17-mile loop around the borough for recreational walking, running and cycling. The Barnet Loop also has the ability to link to town centres, leisure facilities and transport hubs in the borough.
- 11.8.3 In Barnet the issue of climate change and the contribution of traffic to it, will be mitigated through support for mixed use developments, particularly in Barnet's Growth Areas and by comprehensively tackling the school run, ensuring that school travel plans include ambitious targets for walking and cycling. In Barnet's suite of design guidance SPDs the Council sets out generic design and construction principles to reduce the contribution of travel to Barnet's carbon footprint. The Council is exploring alternatives to private vehicles such as car clubs and bike hire to encourage modal shifts
- 11.8.4 Travel planning associated with major developments also has a role to play in encouraging use of more sustainable transport modes. Detailed travel plans for all proposed uses should be submitted with an application. At Brent Cross for example, the developers have submitted a framework travel plan for all land uses as part of the outline application.
- 11.8.5 Efficiencies in the freight and construction sectors can also contribute to a reduced need for trips. This can be achieved by Freight Quality Partnerships, Delivery and Servicing Plans, Construction Logistics Plans and Consolidation Centres when they form key elements of major planning proposals and regeneration schemes. Micro-consolidation centres in or near town centres may also be appropriate for sites that are challenging for large delivery vehicles. Freight Quality Partnerships (FQPs) are voluntary partnerships between the Freight Industry, its customers, local authorities, and other stakeholders. FQPs aim to improve the understanding of local distribution issues and promote constructive solutions, reconciling the need for access for goods and services with environmental and social concerns.

Policy TRC01 – Sustainable and Active Travel

The Council will work to deliver a more sustainable transport network that supports a growing population and prosperous economy by reducing car dependency, encouraging sustainable modes of transport and improving air quality. The Council also recognises that active travel benefits the health of residents while having the lowest environmental impacts. In particular the Council will :

- a) Promote active travel requiring developments to address the needs of cyclists and pedestrians by ensuring :
 - i. Good connections to bus stops, stations; and strategic and local walking and cycling networks;
 - ii. A healthy, safe and attractive walking and cycling environment within, through and in the immediate vicinity around the development; and
 - iii. Seeking opportunities for improvements to the wider walking and cycling environment.

- b)
 - i. Supporting delivery of new transport infrastructure identified in Policy TRC02 and the BLLTS;
 - ii. Refuse proposals that have a negative impact on highway safety or on the road network that cannot be appropriately mitigated;
 - iii. Support the Healthy Streets Approach, improving street lighting, security coverage and accessibility along new walking and cycling routes, transport interchanges and around bus stops as well as delivering, where resources permit and in appropriate locations, targeted local safety schemes; and
 - iv. Promote orbital travel improvements where appropriate.

- c) For all major development proposals, the Council will require:
 - i. A Transport Assessment setting out how the proposal mitigates any negative impact on the existing transport network and incorporates sustainable transport initiatives for cycling, walking, car clubs and electric vehicle charging;
 - ii. A Travel Plan setting out details on how the proposal minimises any increase in road traffic and how future occupants will be encouraged to use more sustainable and active modes of transport and demonstrate how the development will contribute to Barnet meeting its 72% target for sustainable modes by 2041 as set out in the Mayor’s Transport Strategy and the BLTTS; and

- iii. Construction Traffic Management Plan (CTMP) / Construction Logistics Plan and Delivery and Servicing Plans to control vehicle movements, servicing and delivery arrangements.

11.9 Investing in Infrastructure

11.9.1 Despite facing challenging housing targets, Barnet does not benefit from levels of public transport investment seen in other parts of the capital and country. Increasing travel demand without proportionate infrastructure investment across the modes leads to increased congestion and reduced reliability of transport networks and services. Reducing car use as part of an overall transport strategy can tackle congestion particularly in urban areas. In suburban areas such as Barnet this is more challenging (except in some town centres) as the lower public transport accessibility limits transport choice for many journeys. Increased priority for public transport helps make it more attractive, improving the level of usage and decreases the level of reliance of Barnet residents on private vehicles.

11.10 Ensuring Efficient Use of the Local Road Network

11.10.1 The Council will ensure that developers make appropriate enhancements to the road network affected by their development in order to mitigate the impacts of the proposal on the local road network, particularly in Growth Areas as set out in Policy GSS01.

11.10.2 Construction maintenance and utility work can have a serious impact on the transport network. Therefore, the Council will require submission and approval of Construction Traffic Management Plan (CTMP) / Construction Logistics Plan (CLP) before works are carried out.

11.10.3 The Council will work with TfL on improving the local bus network, with the aim of more closely and efficiently matching demand and capacity and improving public transport accessibility overall. The Council will also seek a review of how the night tube and the local night time economy has impacted on the night bus network and to provide appropriate facilities for coaches, private hire vehicles and taxis.

11.11 Delivery of High Quality Transport Systems in Growth Areas

- 11.11.1 Major growth across Barnet provides opportunities to deliver high quality transport improvements in a planned and structured manner, and closely co-ordinated with other transport authorities, including adjacent boroughs. Barnet's Growth Areas are supported by a range of planning documents including area action plans, development frameworks, transport assessments/ statements, Travel Plans, negotiated planning (S106) and highway agreements (S278), planning conditions and delivery plans. These tools enable developments to be appropriately phased and aligned with investment to deliver proposed improvements to transport and the public realm. Outside these areas the Council requires Transport Assessments / Statements and Travel Plans as set out in Policy TRC01.
- 11.11.2 In order to manage changed traffic movements in these Growth Areas the Council seeks investment in access improvements to existing public transport interchanges. Future public transport interchanges will be designed to ensure easy access for all. At Brent Cross efficient use of the transport system will be assisted by utilising existing spare and future planned capacity on the rail network, particularly in the contra peak direction.
- 11.11.3 Town centres, such as Edgware, Finchley Central and Golders Green are already public transport hubs. Such hubs can benefit from further investment in improving accessibility, including walking and cycling routes.
- 11.11.4 The Brent Cross Growth Area will benefit from new and enhanced bus services, including better bus links between Brent Cross, Colindale and neighbouring boroughs. The BLLTS contains an action to link West London Orbital, both branches of the Northern Line, Great Northern, Piccadilly, Jubilee and potential Crossrail 2 lines (existing National Rail lines) with rapid and orbital bus routes. In addition there will be improvements at the existing Brent Cross and Cricklewood rail stations and a new station at Brent Cross West where many passengers are expected to reverse commute and arrive in the 'contra-peak' direction, from Central London in the morning, helping to utilise spare rail capacity. The new bus station at Brent Cross will replace the existing Brent Cross Shopping Centre bus station and although it is not within the Brent Cross scheme, it will provide benefits to the area and the wider bus network.
- 11.11.5 Planned development and enhancement programmes in town centres will provide opportunities to improve public realm and public transport accessibility as well as walking, cycling and appropriate provision for parking and servicing. This will help make town centres more attractive places to visit. Town centres are also prime locations for enhancement and new development opportunities are being explored through the planned approaches as set out in Policy TOW02. Further detail on the Council's approach to public realm in Barnet is set out at Policy CDH03.

- 11.11.6 These approaches set the basis for the preparation of detailed transport mitigation and improvements likely to be required in association with future redevelopment proposals within town centres. These proposals should be informed by the outputs of an area wide transport model. These will be delivered through Community Infrastructure Levy (CIL), S106 and other contributions from development.
- 11.11.7 To help keep Barnet moving whilst minimising carbon emissions the Council will encourage greater numbers of electric vehicles. New development is required to provide a proportion of the car parking spaces in the development with charging points for electric vehicles in accordance with London Plan Policy T6, with at least 20 per cent of spaces for new residential development having active charging facilities, and passive provision for all remaining spaces, i.e. the infrastructure should be in place to ensure they can be made into active spaces in the future. All car club parking spaces should be supplied with an active charging point for electric vehicles. Charging facilities are now also available from some on street car parking spaces and car parks. For more detail on electric car charging points see <https://tfl.gov.uk/modes/driving/electric-vehicles-and-rapid-charging> or [Electric vehicles in Barnet | Barnet Council](#).
- 11.11.8 Public transport operations require facilities such as depots, interchanges and bus standing areas in order to operate flexibly and efficiently and the Council will seek suitable opportunities to provide these as development sites come forward and as part of the Local Plan Schedule of Proposals.

Policy TRC02 – Transport Infrastructure

The Council will promote delivery of new transport infrastructure to support the travel needs of a growing population. It will provide a range of alternative travel modes and facilitate growth as set out at Policy GSS09 and Policy GSS11.

- a) The Council will in particular support the delivery of key new transport infrastructure, including (but not restricted to):
- i. A new rail station at Brent Cross West and transport interchange;
 - ii. A replacement bus station at Brent Cross Shopping Centre;
 - iii. A new underground station and enhanced public transport interchange at Colindale;
 - iv. A new passenger rail line - the West London Orbital Line together with upgrades to existing stations (Cricklewood and Hendon and new station at Brent Cross West) on the line;
 - v. Crossrail 2 at New Southgate;
 - vi. New bus stopping and standing arrangements in North Finchley to allow for redevelopment of the bus station for commercial uses;
 - vii. Interchange improvements at Edgware
 - viii. Feasibility of other public transport improvement projects will be explored as appropriate, including the protection and enhancement of existing public transport operational facilities and where necessary the provision of new facilities.

b) The Council has an adopted Long Term Transport Strategy (2020-2041) It will work with Highways England, TfL, Network Rail and others to deliver schemes identified within the BLLTS document

In particular:

- i. The Council will seek to work with TfL and others to increase rail capacity in Barnet and to improve all London Underground, Thameslink and Great Northern Rail stations in Barnet, especially where these have potential to deliver Step Free access for passengers;
- ii. To work with TfL and neighbouring boroughs to review and improve the bus network and overall public transport provision, including seeking to develop proposals to improve orbital transport provision within the Borough;
- iii To deliver and promote infrastructure for electric or other ultra-low emission vehicles; and
- iv Work with TfL to identify and protect land for enhancing rail capacity, including for the stabling of trains and sidings.
- v Identify and deliver projects that enhance the pedestrian and cycling network in Barnet, such as the Barnet Loop

11.12 Parking

11.12.1 London is a diverse city, and as such it requires a flexible approach to identifying appropriate levels of car parking. As an Outer London Borough Barnet faces the challenge of low levels of overall public transport accessibility, especially in the north of the Borough. This is compounded by a lack of orbital travel options. The Mayor's London Plan sets out car parking standards for residential and non-residential uses and advocates that such standards should not be exceeded. For non-residential uses the Council supports the application of London Plan car parking standards. For residential uses the Council advocates an approach which is more reflective of local circumstances.

11.12.2 Barnet's Car Parking Study sets out the basis for a locally specific approach to parking provision. The Council accepts the need for restraint in terms of car parking management, but intends to apply the standards set out in Table 23 for residential developments with sensitivity to local circumstances. The accessibility of individual locations will be taken into consideration, based on:

- The public transport accessibility level (PTAL);
- Travel Time Mapping (TIM);
- Opportunities for sustainable orbital travel
- Orbital access by public transport ;
- Parking stress including the level of on-street parking control;
- Population density and parking ownership of surrounding areas;
- Location and proximity to local services (i.e. is it in a town centre);

- Ease of access by cycling and walking; and
- Other relevant planning or highways considerations, such as to whether the proposal is a conversion of an existing use.

11.12.3 The improvement of orbital connectivity of bus services within Barnet is vital if suitable alternatives to the private vehicle are to be effective. For this reason a method to calculate the level of orbital access by public transport has been developed. This is available in Appendix A of the Car Parking Standards Report 2021. Developers in PTALs 5 and 6 need to determine the level of orbital access for their site to determine the car parking requirements.

11.12.4 Appropriate parking levels for disabled people, that meets London Plan standards, should always be provided in developments. This may include visitors parking for disabled residents who may have regular visitors such as carers and provision should also be made for motorcycle parking. Parking requirements for the emergency services which have particular operational needs will need to be assessed on an individual basis. All other uses except residential should provide parking in accordance with the relevant London Plan parking standards. Uses which don't have parking standards set out in the London Plan will be required to be assessed by the developer as part of the Transport Assessment.

11.12.5 Appropriate car club and visitor parking must be included in the overall parking figures for the relevant uses and not be additional to the number calculated as appropriate. The Council will seek appropriate car club parking ratios in locations with higher PTALs mainly in town centres and Growth Areas. On street parking management and controls will be applied appropriately taking into consideration local conditions and issues, and to ensure the free flow of traffic. Where parking pressure has been identified in residential neighbourhoods a Controlled Parking Zone (CPZ) could be introduced, in consultation with residents, to ensure existing residents have access to parking in their own area.

11.12.6 Some developments however, may have difficulty meeting parking requirements, particularly in town centres. In these situations and when public transport and active travel is available, the Council will show flexibility in the assessment of parking requirements. Where necessary within CPZs the Council will restrict new occupiers from obtaining car parking permits through a legal agreement. The Council will apply the standards set out in Table 23 as a cap on the number of CPZ permits able to be applied for. In some cases it could be appropriate to block the occupiers from obtaining CPZ permits through legal agreement, in other cases it may be appropriate to impose a cap per dwelling which is aligned to the standards in Table 23, also enforced through legal agreement. This will help reduce parking congestion in town centres for other users.

- 11.12.7 Also where development proposals are on the edge of a CPZ, or are within a CPZ with controlled hours, the streets in close proximity but outside the CPZ will need to be included in the parking survey to ensure parking stress is not increased in the surrounding area not covered by the CPZ. The scope of the on street parking surveys must be agreed in advance with the Council.
- 11.12.8 The Council will require a Car Parking Design and Management Plan to be submitted for all applications which include car parking. This should incorporate TfL guidance on car parking management and design.
- 11.12.9 Levels of car parking provision can also be reduced through the delivery of car club parking bays and pool cars which promote a more efficient use of parking spaces. A network of car club bays spread across the Borough should provide a convenient and cost-effective alternative to owning a private car. Developers providing memberships to car clubs for periods of 3 to 5 years assist residents in moving away from dependence on private vehicles.
- 11.12.10 Parking for bicycles and electric vehicle charging points will generally be provided in accordance with the London Plan⁶⁹ and meet the London Cycling Design Standards for all new development or as agreed in a Travel Plan. Edgware Town Centre is identified in the London Plan⁷⁰ as requiring higher than minimum cycle parking standards. Major residential, high density developments should provide secure onsite cycle spaces for each unit. Mixed use town centre development should provide secure off-street space where possible as part of the development and on-street spaces as part of public realm improvements. Showering and changing facilities for cyclists should be provided as part of all non-residential development. Provision of safe, secure and sheltered cycle parking facilities, for commuters and visitors to town centres should also be considered.

Table 23 – Residential Car Parking Standards

PTAL	Maximum spaces per unit*	
	LBB Proposed Parking Standards for 1/2 bed units	LBB Proposed Parking Standards for 3+ bed unit
0	1.25	1.5 [^]
1	1.25	1.5 [^]
2	0.75	1
3	0.75	1
4	0.5-0.75 [#]	0.5-0.75 [#]
5	Car free ~ !	Car free ~ !
6	Car free ~ !	Car free ~ !

* Metropolitan and Major Town Centres to be Car Free~; and Up to 0.5 spaces per dwelling be allowed for developments within Opportunity Areas.

~ With the exception of disabled persons parking, see Part G Policy T6 .1 Residential parking.

! Where the orbital access by public transport is calculated as 4 or less, minimal parking for car club schemes are to be considered along with contributions towards improving bus services and CPZs

(this does not preclude the Council from requesting contributions towards other appropriate transport related projects in the area, or override the CPZ requirements for other parts of the Borough).

When considering development proposals that are higher density or in more accessible locations, the lower standard shown here should be applied as a maximum.

^ Boroughs should consider standards that allow for higher levels of provision where there is clear evidence that this would support additional family housing.

Policy TRC03 – Parking Management

The Council will expect development to provide parking in accordance with the London Plan standards (Policy T6. Car Parking and Policies T6.2-T6.5.), except in the case of residential development.

- a) The Council will expect residential development to provide parking in accordance with Table 23.
- b) Where development is proposed, and it is deemed a CPZ is necessary then it should be in place within the surrounding area of the development before occupation. A developer contribution towards the implementation and monitoring of the CPZ will be agreed as part of the planning permission.
- c) Residential parking permits will only be available to Blue Badge holders in car free developments. Disabled Persons parking should be provided in accordance with London Plan Policies T6.1 and T6.5.
- d) Where development proposals involve a reduction of existing off-street car parking spaces, the developer must demonstrate that sufficient parking will remain in the area to serve local needs.
- e) Cycle parking is to be delivered in accordance with London Plan Standards set out in Policy T5 Cycling.
- f) Electric Vehicle charging points to be delivered in accordance with London Plan Standards as appropriate for the use.
- g) Spaces should be available for car club vehicle parking along with car club membership for future residents of the development within the agreed car parking provision.
- h) Appropriate provision should be made for efficient deliveries and servicing.

11.13 Digital Communication

11.13.1 Advances in communication technology have transformed the way people work. With increased on-line services and growth of home based workers, combined with more flexible working practices, the expectation is the pattern of commuter travel will change further as more people are able to travel outside the busiest times. The Council is generally supportive of proposals that improve e-infrastructure and access to business services / managed workspaces in town centre locations.

11.13.2 According to Ofcom⁷¹ Broadband speeds in Barnet vary. This may cause issues for companies relying on digital connectivity wanting to locate in the Borough. In order to make Barnet a viable destination for commercial enterprises in the future developers and providers are therefore encouraged to improve the level of connectivity in the Borough. Subject to the level of rents in central London, areas of outer London with good transport connections have an opportunity to attract emerging tech businesses, if the digital connectivity can be improved. Barnet is working with other boroughs in the West London Alliance to identify opportunities for digital innovation across the area. Developers bringing forward employment space will therefore need to consider how they might contribute to improving their development's digital connectivity with high quality communications infrastructure.

11.13.3 Smart technology has the ability to provide transformative change and through technological innovation, assist in addressing many of the challenges of development. The Council encourages the implementation of smart city technology, concepts and systems to:

- a) plan, deliver and manage development by monitoring building health and energy and efficiency;
- b) improve the quality of life of local people and Londoners through air quality monitoring, and encouraging preventative health initiatives in the community;
- c) create and capture economic, social and environmental opportunities by:
 - i. providing new opportunities for business;
 - ii. providing better communication and community safety initiatives (e.g. CCTV) to help create more cohesive and inclusive communities; and
 - iii. improving the monitoring of flood risk and understanding of demands for energy and water demands as well as assessing the health of infrastructure such as water mains.

11.13.4 Barnet utilises wireless communication for CCTV monitoring and management. Contributions from developments may be required to deliver infrastructure for CCTV to ensure continuity of coverage of an area. Developers also need to consult with the Council to ensure that their proposal will not interfere with existing broadcast and communication services, including CCTV. The Council will, if necessary, request mitigation measures such as the installation of a signal carrying device, during the construction phase(s) and at completion of the development.

Policy TRC04 – Digital Communication and Connectivity

The Council will promote the development of advanced, high quality communications infrastructure to support economic growth and more accessible, inclusive communities and enabling residents to work from home. Developments should facilitate high speed broadband and advancement in communication networks where possible.

Proposals for the installation of telecommunications equipment will be permitted where it can be demonstrated that:

- i. There is no significant adverse effect on the external appearance of the building on which, or space in which, they are located;
- ii. The special character and appearance of all heritage assets are preserved or enhanced;
- iii. The possibility of sharing facilities, such as masts, cabinet boxes and satellite dishes, and erecting antennae on existing buildings or other structures has been fully explored and where practical becomes the preferred location;
- iv. Technologies to minimise and camouflage any telecommunications apparatus have been explored;
- v. They are appropriately designed, coloured and landscaped to take account of their setting, and are sited in context with their setting;
- vi. The heights and usage of surrounding buildings and screening opportunities have been taken into account and
- vii. There is no significant adverse impact on the visual amenities of neighbouring occupiers.

Where buildings or other structures taller than 3 storeys are proposed these should not interfere with existing broadcast and electronic communications services, particularly CCTV. Where such interference is unavoidable mitigating measures are required to ensure that the quality of existing signal reception is maintained as a minimum.

12 Chapter 12 - Delivering the Local Plan

12.1 Introduction

12.1.1 As a London Borough, Barnet has powers under planning and other legislation to help ensure that the development that is set out in this Local Plan is delivered. This chapter highlights the powers that Barnet has as Local Planning Authority to help deliver development and the Council's wider corporate objectives. As a local planning authority determining planning applications, the Council will determine applications in accordance with policy set out in this local plan unless material considerations indicate otherwise.

12.2 Working with partners

12.2.1 This Local Plan cannot be delivered by the Council in isolation. A wide range of public and private sector stakeholders as well as existing and new communities will also help with delivery.

12.2.2 Barnet's Statement of Common Ground shows how the Council is working with neighbouring boroughs, the wider West London sub-region and other north London local authorities to ensure that Barnet's Local Plan takes account of their plans and programmes as well as the spending and delivery plans of regional bodies such as the GLA and Transport for London. This demonstrates how we meet the Duty to Cooperate.

12.2.3 The Council will ensure that a consistent approach is taken in relation to Growth Areas and town centres which adjoin or cross borough boundaries.

12.3 Enforcement

12.3.1 The Council aims to ensure that development complies with appropriate national and local planning policy and guidance through effective enforcement. Where necessary, the Council will use its powers to take planning enforcement action to ensure that unacceptable development built without planning permission or other consents does not compromise the delivery of the objectives set out in this Local Plan. The Council has a proactive enforcement team that carry out a large number of investigations each year and take legal action to ensure compliance with planning legislation as necessary.

12.4 Delivering infrastructure alongside development

12.4.1 An important role of the planning system is to identify and coordinate the provision of infrastructure. The council has prepared an Infrastructure Delivery Plan (IDP) in order to help do this effectively, and to support a review of the CIL Charging Schedule which is ongoing and explained further below.

12.4.2 The IDP forms a key part of the Local Plan evidence base and:

- Reviews the existing capacity of infrastructure provision across the Borough;

- Identifies infrastructure needs, gaps and deficits in provision and costs of updating and delivering new infrastructure (including where possible, the phasing of development, funding sources and responsibilities for delivery);
- Ensures that infrastructure providers have been involved in the IDP process so as to better align their priorities and resources with delivery of the Local Plan vision and objectives.

12.4.3 The IDP is a “living” document that will be used as a tool for helping to deliver infrastructure. It will be monitored and revised where necessary. The IDP is used to inform the Council’s capital programme and its work in terms of supporting other agencies delivering infrastructure requirements, particularly through developer contributions, such as Community Infrastructure Levy and S106 planning obligations.

12.4.4 The planning process has three main mechanisms for ensuring or contributing to the delivery of the infrastructure that will be required to support development given planning permission. These are the Community Infrastructure Levy (CIL) ,S106 planning obligations and s278 highways agreements.⁷²

12.5 Community Infrastructure Levy (CIL)

12.5.1 The Community Infrastructure Levy (CIL) is a standardised non-negotiable planning charge levied on new development, introduced by the Planning Act 2008. Barnet has been charging CIL since 2013 and it is an important source of funding for infrastructure to support development. From 2013 to April 2021 the Council has collected circa £76 million in CIL payments which have been used to provide infrastructure or improvements to infrastructure in the Borough. The IDP has identified a need for £1.2 billion of new or improvements to existing infrastructure in the Borough. The IDP is being used to support a review of the Barnet CIL Charging Schedule which is being brought forward ahead of this local plan to help ensure developments pay an appropriate contribution towards infrastructure through the levy and to secure more funding for infrastructure to deliver the Local Plan objectives. The rate for residential, which comprises the majority of charges applied, is proposed to increase from circa £200 per square metre to £300 per square metre. Actual receipts from CIL are very difficult to anticipate in advance as receipts are dependent on planning permissions being implemented and some planning permissions are not implemented or take some time to be implemented as sites changes hands or schemes are revised. An estimate undertaken for the charging schedule review indicated that circa £500 million could be collected through CIL though the lifetime of this plan, if all of the development set out in the plan is granted permission after adoption of the new charging schedule and comes forward. It is therefore anticipated that the Council’s current projection of collecting £10 million a year in CIL, could increase to £33 million a year. This will not be sufficient to provide all the infrastructure required as set out in the IDP, so the Council will need to secure other funding from other infrastructure providers / funders as well as using its other income streams effectively.

12.6 Planning obligations

- 12.6.1 Section 106 of the Town and Country Planning Act 1990 allows local planning authorities to enter into a legal agreement with a developer that would make a development proposal acceptable in planning terms that would not otherwise be acceptable. That might, for example, include the amount of affordable housing which would be included in the development scheme, or an item of infrastructure, or financial contribution towards it, such as a new school or the provision of a new highway junction. NPPF (para 34) sets out that Local Plans should highlight the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine Local Plan deliverability.
- 12.6.2 Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. NPPF (para 56) highlights that planning obligations must only be sought where they meet all of the following tests:
- a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonably related in scale and kind to the development.
- 12.6.3 Planning obligations can help to contribute to the success of a development and achieving the Council's aims for a site, the local area and the Borough as a whole. They can enhance the quality of a development and enable proposals to go ahead that would otherwise be refused. Planning obligations will only be sought where it is not possible to deal with the matter through the imposition of a condition on a planning permission.
- 12.6.4 The items sought through a planning obligation will vary depending on the development scheme and its location. Considerations that may require S106 include:
- improvements to public transport infrastructure, systems and services;
 - education provision;
 - affordable or special needs housing;
 - health facilities;
 - small business accommodation and training programmes to promote local employment and economic prosperity;
 - town centre regeneration, promotion, management and physical environmental improvements including heritage and conservation;
 - improvements to highways and sustainable forms of transport;
 - environmental improvements including air quality;
 - provision of public open space and improving access to public open space;
 - other community facilities including policing; and
 - other benefits sought as appropriate.

12.6.5 Details for how these considerations will be identified and negotiated for Barnet are set out in the Planning Obligations SPD..

12.6.6 Changes to the CIL regulations in 2019 removed Section 106 pooling restrictions and the requirement for a regulation 123 list, meaning that both Section 106 and CIL contributions can now be used to fund the same piece of infrastructure. In practice however, to be in accordance with the planning obligations tests, s106 will continue to be used to address site specific impacts, and CIL will be used for more strategic infrastructure.

12.7 **S278 Highways Agreements**

12.7.1 Under section 278 of the Highways Act 1980, a local highways authority can enter into a legal agreement with a developer (in order to facilitate development) for the developer to either pay for, or make alterations or improvements to the highway. The need for a s278 Highways Agreement will be identified as part of the consideration of a planning application and the requirement to enter into a s278 will be secured through a planning obligation.

12.8 **Viability**

12.8.1 NPPF (para 57) highlights that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.

12.8.2 Developers should factor in the costs of delivering Local Plan objectives when considering potential development proposals or site purchases. Where proposals meet the policies in this Plan, it will be assumed that they are viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at application stage. Such circumstances could include:

- where development is proposed on an unallocated site of a different type to those used in the viability assessment that informed this Plan;
- where further information on infrastructure or site costs is required;
- where the type of development proposed is significantly different from standard models of development e.g. build to rent; and
- where economic circumstances have significantly changed since Local Plan adoption.

12.9 **Monitoring**

12.9.1 Monitoring is an important part of the continuous planning process. A set of key indicators and targets have been developed so that the effectiveness of policies in achieving the objectives can be assessed. Where objectives are not being met, appropriate action may be taken which can adjust the outcome or, in some circumstances, a review of policy may be necessary. The key indicators are set out in the table below.

Table 24 – Monitoring Indicators

Category/Number	Key Performance Indicator	Policy	Target (if applicable)	Source of Monitoring Information
Housing				
1	Housing supply – number of net additional dwellings completed in the Borough	BSS01: Spatial Strategy for Barnet	Deliver 35,460 new homes between 2021 and 2036	Planning database and on-site monitoring
2	Housing supply - number of net additional dwellings completed in strategic locations	GSS01: Delivering Sustainable Growth	Delivery of new homes between 2021 and 2036 in accordance with time periods set out in Table 5.	Planning database and on-site monitoring
3	Housing supply – allocated land for development progress	GSS01: Delivering Sustainable Growth	Delivery of new homes through Site Proposals in accordance with Table 5A	Housing trajectory
4	Affordable housing delivered as % of net additional dwellings	HOU01: Affordable Housing	Minimum 35% affordable housing from all developments of 10 or more dwellings.	Planning database and Affordable Housing team
5	Housing mix – building the right homes for the next generation	HOU02: Housing Mix	New homes delivered in accordance with HOU02 dwelling size priorities	Planning database
6	Conversions and Re-development – management of family housing stock	HOU03: Residential Conversions and Re-development of Larger Homes	No conversion or re-development of larger houses in locations that are either in an area with a PTAL of 4 or less OR are not within 400 metres walking distance of a Major or District Town Centre	Planning database
7	Specialist housing – number of specialist older persons homes provided	HOU04: Specialist Housing	Delivery in accordance with London Plan	Planning database
8	Specialist housing – management of Houses in Multiple Occupation (HMO)	HOU04: Specialist Housing	All new HMOs meet requirements of the Additional Licensing Scheme	Planning database and Environmental Health Private

				Sector Housing Team
9	Specialist housing – management of student accommodation	HOU04: Specialist Housing	All new student accommodation subject to a Student Management Plan	Planning database
10	Inclusive design and access standards - % of units which are M4(2): accessible and adaptable dwellings compliant and M4(3): wheelchair user dwellings compliant	CDH02: Sustainable and Inclusive Design	All new homes meet M4(2) standard and 10% of new homes to meet M4(3)	Planning database
Brent Cross and Brent Cross West				
11	Housing supply - number of net additional dwellings completed within Brent Cross Growth Area and Brent Cross West	GSS01: Delivering Sustainable Growth GSS02: Brent Cross Growth Area GSS03: Brent Cross West Growth Area	Deliver minimum of 9,500 new homes in Brent Cross and 1,800 new homes in Brent Cross West between 2021 and 2036 in accordance with time periods set out in Table 5	Planning database and Brent Cross Team
12	Office and retail – new floorspace provision for office and retail	BSS01: Spatial Strategy for Barnet GSS02: Brent Cross Growth Area	Deliver 395,000m2 of new office space and 56,000m2 of new retail space within Brent Cross Growth Area	Planning database and Brent Cross Team
13	Transport – improvements to transport infrastructure within the Brent Cross Growth Area and Brent Cross West Growth Area	BSS01: Spatial Strategy for Barnet GSS02: Brent Cross Growth Area GSS03: Brent Cross West Growth Area	Delivery in accordance with IDP	Planning database and Brent Cross Team
Character, Design and Heritage				
14	Tall buildings – number of and location of tall buildings approved/completed	CDH04: Tall Buildings	No Tall Buildings outside of Strategic Locations	Planning database
15	Heritage assets – number of buildings on the heritage assets at risk register	CDH08: Barnet's Heritage	No increase in buildings on Heritage Assets at Risk Register	Heritage Team

16	Conservation – number of conservation appraisals less than 5 years old	CDH08: Barnet's Heritage	No conservation appraisal is more than 5 years old	Heritage Team
Town Centres				
17	Town centres, local centres and parades – trends within Barnet's town centres, local centres and parades	TOW02: Development Principles in Barnet's Town Centres, Local Centres and Parades	No significant reduction in Commercial, Business and Service Use Class floorspace within primary frontages	Planning database Retail surveys
18	Clustering of specific town centre uses - Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars	TOW03: Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars	All new Hot Food Takeaways meet the Healthier Catering Commitment No proposals refuse to demonstrate evidence of health impacts through a Health Impact Assessment	Planning database Retail surveys, Public Health team.
Community Infrastructure				
19	Community infrastructure delivery	CHW01: Community Infrastructure	Delivery of community facilities and infrastructure in accordance with Barnet's IDP	Infrastructure Delivery Plan
19A	Family Friendly Barnet	CHW03 : Making Barnet a Safer Place	Increasing the % of young people and adults that consider the Borough is Family Friendly	Youth Perception Survey
20	Public houses – number of public houses closed	CHW04: Protecting Public Houses	No loss of public houses that have been vacant for less than 12 months and subject to continued marketing for at least 24 months	Planning database
Economy				

21	Offices – new floorspace provision for offices	ECY01: A Vibrant Local Economy	Delivering minimum of 67,000m2 of new office space in District Town Centres	Planning database
22	Industrial – managing LSIS within the borough	ECY01: A Vibrant Local Economy	No net loss of employment floorspace within LSIS	Planning database
23	Affordable workspace – total affordable employment floorspace proposed	ECY02: Affordable Workspace	Delivery of 10% of gross new employment floorspace or equivalent alternative	Planning database
Environment				
24	Regional Park – a new Regional Park within designated Green Belt or MOL	BSS01: Spatial Strategy for Barnet GSS13: Strategic Parks and Recreation	Delivery in accordance with IDP	Greenspaces Team
25	Sports and Recreation - 3 new designation hubs for sports and recreation at: <ul style="list-style-type: none"> • Barnet and King George V Playing Fields • Copthall Playing Fields and Sunny Park • West Hendon Playing Fields 	BSS01: Spatial Strategy for Barnet GSS13: Strategic Parks and Recreation	Delivery in accordance with IDP	Greenspaces Team
26	MOL/Green Belt – amount of borough designated MOL/Green Belt	ECC05: Green Belt and Metropolitan Open Land	No net loss of land designated Green Belt and MOL	Planning database and Greenspaces Team
27	Open space – amount of open space	ECC04: Barnet's Parks and Open Spaces	No net loss of public open space	Planning database and Greenspaces Team
28	Mitigating climate change – number of permitted and completed major development schemes designed to achieve the net zero target	ECC01: Mitigating Climate Change	Delivery in accordance with net carbon targets in London Plan and Mayor's Energy Hierarchy	Planning database
29	Waste – capacity of waste management facilities both new and existing	ECC03: Dealing with Waste	Targets as set out in NLWP	Planning database

30	Biodiversity – change in areas of biodiversity importance	ECC06: Biodiversity	No net loss of area designated as SINC	Planning database and Greenspace Team
31	Biodiversity – ensuring development makes fullest contribution to enhancing biodiversity	ECC06: Biodiversity	All proposals to provide at least 10% Biodiversity Net Gain	Planning database
Transport				
32	Parking – number of cycle parking spaces provided	TRC03: Parking Management	Delivery in accordance with London Plan	Planning database
33	Parking – number of disabled parking spaces provided	TRC03: Parking Management	Delivery in accordance with London Plan	Planning database
34	Parking – number of electric vehicles charging points	TRC03: Parking Management	Delivery in accordance with London Plan	Planning database

13 Appendix A – List of Technical Evidence

LB Barnet

Authorities Monitoring Reports

Published

Barnet Characterisation Study (2010)
 Barnet Substance Misuse Needs Assessments (2019)
 Barnet Employment Land Review (2017)
 Barnet Indoor Sports and Recreation Facility Study (2018)
 Barnet Surface Water Management Plan (2011)
 Barnet Local Flood Risk Management Strategy (2017)
 Barnet Town Centre Floorspace Needs Assessment (2017)
 Barnet Housing Delivery Action Plan (2019)
 Barnet Shisha Bars Report (2016)
 Barnet Hot Food Takeaways Review (2018)
 Barnet Strategic Housing Market Assessment (2018)

Integrated Impact Assessment (Sustainability Appraisal, Equalities Impact Assessment, Health Impact Assessment)

Barnet Residential Conversions Study (2019)
 Barnet Green Belt and Metropolitan Open Land Study (2018)
 Barnet Joint Strategic Needs Assessment (2019)
 Barnet Car Parking Study (2019)
 Barnet Public Houses Review (2018)
 Barnet Tall Buildings Update (2020)
 Barnet Key Facts Evidence Paper (2020)

Published at Reg 19

Barnet Infrastructure Delivery Plan
 Barnet Strategic Transport Assessment
 Barnet Local Plan Viability Assessment
 Gypsy and Traveller Accommodation Needs Assessment Update
 Barnet Car Parking Study Update
 Barnet Strategic Flood Risk Assessment – Stage 2

West London

Published

West London Strategic Flood Risk Assessment (2018)
 West London Strategic Housing Market Assessment (2018)
 West London Gypsy and Traveller Accommodation Needs Assessment (2018)
 West London Employment Land Review (2019)

To be published

West London Affordable Workspace Study

London

London Office Policy Review (2017)

London Industrial Demand Study (2017)
GLA London Strategic Housing Land Availability Assessment (2017)
GLA Town Centre Health Checks (2017)
London's Regional Landscape Framework (2011)

National

Demographic Information including Census data and GLA Projections

14 Appendix B – Acronym Buster and Glossary

Acronym Buster

ACV	Asset of Community Value
AEP	Annual Exceedance Probability (in relation to flooding)
ALGG	All London Green Grid
AOD	Above Ordnance Datum
AQMA	Air Quality Management Area
ASD	Autistic Spectrum Disorders
BELR	Barnet Employment Land Review
BLTTS	Barnet Long Term Transport Strategy
BNG	Biodiversity Net Gain
BPOSS	Barnet Parks and Open Spaces Strategy
BRE	Building Research Establishment
BREEAM	Building Research Establishment Environmental Assessment Method
BS	British Standard
BSS	Barnet's Spatial Strategy Policy
BXC	Brent Cross Cricklewood
CCG	Clinical Commissioning Group
CCTV	Closed Circuit Television
CDA	Critical Drainage Area
CDN	Character, Design & Heritage Policy
CHW	Community Uses, Health & Wellbeing Policy
CIL	Community Infrastructure Levy
CLP	Construction Logistics Plan
CPZ	Controlled Parking Zone
CS	Core Strategy
CTMP	Construction Traffic Management Plan
DE	Decentralised Energy
DEFRA	Department of Environment Food and Rural Affairs
DfE	Department for Education
DM	Development Management
DPD	Development Plan Document

ECC	Environment & Climate Change Policy
ECY	Economy Policy
EPC	Energy Performance Certificate
EqIA	Equalities Impact Assessment
ESFA	Education and Skills Funding Agency
FQP	Freight Quality Partnership
GIA	Gross Internal Area
GiGL	Greenspace Information for Greater London (online map)
GSS	Growth & Spatial Strategy Policy
HADAS	Hendon & District Archaeology Society
HIA	Health Impact Assessment
HOU	Housing Policy
HRA	Habitats Regulation Assessment
HSE	Health and Safety Executive
IBSA	International Bible Students Association
ICP	Integrated Care Partnership
ICS	Integrated Care System
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
JSNA	Joint Strategic Needs Assessment
KFC	Kentucky Fried Chicken
LEA	Local Employment Agreement
LEGGI	London Energy and Greenhouse Gas Inventory
LFEP	London Fire and Emergency Planning Authority
LFRMS	Local Flood Risk Management Strategy
LILDS	London Industrial Land Demand Study
LIP	Local Implementation Plan
LLDC	London Legacy Development Corporation
LLFA	Lead Local Flood Authority
LOPR	London Office Policy Review
LSIS	Locally Significant Industrial Site
MAC	Marginal Abatement Cost
MHCLG	Ministry of Housing, Communities & Local Government
MOL	Metropolitan Open Land
NEET	Not Engaged in Education, Employment or Training
NLWA	North London Waste Authority

NLWP	North London Waste Plan
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NRP	Network Recovery Programme
PCN	Primary Care Network
PDSA	Peoples Dispensary for Sick Animals
PHE	Public Health England
PRA	Preliminary Risk Assessment
PTAL	Public Transport Accessibility Level
PVI	Private Voluntary and Independent Sector
RDT	Resilient Design Tool
RoFSW	Risk of Flooding from Surface Water
SA	Sustainability Appraisal
SAB	Sustainable Urban Drainage Systems Approving Body
SAP	Standard Assessment Procedure
SEET	Skills, Employment, Enterprise and Training
SEN	Special Educational Needs
SEND	Special Educational Needs and Disability
SFRA	Strategic Flood Risk Assessment
SIL	Strategic Industrial Location
SINC	Site of Importance for Nature Conservation
SME	Small to Medium Enterprise
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SSSI	Site of Special Scientific Interest
STP	School Travel Plan
SUDS	Sustainable Urban Drainage Systems
TCFNA	Town Centre Floorspace Needs Assessment
TIM	Travel Time Mapping
TfL	Transport for London
TLRN	TfL Road Network
TOW	Town Centres Policy
TPO	Tree Preservation Order
TRC	Transport & Communications Policy
UGF	Urban Greening Factor
ULEZ	Ultra Low Emission Zone

WFD	Water Framework Directive
WLA	West London Alliance
WLELR	West London Employment Land Review
WLO	West London Orbital

Glossary

This Glossary highlights Barnet Local Plan terminology and should be used as a supplement to Annex 2 of the National Planning Policy Framework and Annex 3 of the London Plan.

15 Minute Neighbourhood : A residential urban concept in which all residents are able to meet most of their daily needs within a short walk or cycle ride from their homes

Affordable Housing: defined by the NPPF 2019 as: housing for sale or rent, for those whose needs are not met by the market. Within London there is a move away from Affordable Rent as a product. The alternative is London Living Rent which is more focused on income. Options in London include:

- London Affordable Rent – for households on low income with rent levels that are genuinely affordable and akin to social rent.
- London Living Rent – for households on average incomes, this offers a lower rent, which enables people to save for a deposit to buy a home.
- London Shared Ownership - allows London households to purchase a share of a new home and pay low rent for the remaining portion e.g. purchase 25% and rent 75%.

For dwellings to be considered affordable in London, annual housing costs should be no greater than 40 per cent of net household income.

Affordable Workspace: Workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose.

Agent of Change : Principle which places the responsibility of mitigating the impact of nuisances (including noise) from existing nuisance generating uses on proposed new development close by, thereby ensuring that residents and users of the new development are protected from nuisances, and existing uses are protected from nuisance complaints. Similarly, any new nuisance-generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.

Air Quality Management Area (AQMA): An area which a local authority has designated for action, based upon a prediction that Air Quality Objectives will be exceeded.

Air quality neutral: Developments that meet or improve on the benchmarks identified by the Mayor of London are considered to avoid any increase in NOx and PM emissions and are therefore neutral in their impact on air quality.

Annual Exceedance Probability (AEP): is the probability of a certain size of flood flow occurring in a single year. A 1 per cent AEP flood flow has a 1 per cent, or 1-in-100 chance of occurring in any one year, This is then adjusted for climate change to take account of the probable increase in the flood occurring due the changing climate.

Barnet Homes: Manages and maintains Barnet Council's housing stock and is the first point of contact for council tenants and leaseholders who have issues related to moving, transferring property, carrying out repairs or anything else connected to Barnet Council housing.

Barnet Loop: The Barnet Long Term Transport Strategy (BLTTS) recognised that additional routes through the borough's greenspaces could extend the Silk Stream Valley Greenwalk and Dollis Valley Greenwalk, creating a 17-mile loop around the borough for recreational walking, running and cycling. The Barnet Loop also has the ability to link to town centres, leisure facilities and transport hubs in the borough. Further detail is available in the BLTTS.

Betting Shop: A store where the primary activity on the premises is betting services. Each Betting Shop is permitted to have up to four gaming machines, known as fixed odds betting terminals.

Biodiversity Net Gain (BNG): requires developers to provide an increase in appropriate natural habitat and ecological features over and above that level identified on site before development commences. The Environment Bill currently identifies that a 10% improvement is required.

Compulsory Purchase Order (CPO): A legal function that allows certain bodies which need to obtain land or property to do so without the consent of the owner.

Controlled Parking Zone (CPZ): are areas where cars can only be parked in designated bays when displaying a valid parking permit. Parking permits are issued at the discretion of the Council.

Critical Drainage Area (CDA): are the areas within Barnet which are considered to be at the highest risk of surface water flooding. There are 33 CDAs in Barnet

Crossrail 2: A proposed new railway serving London and the Wider South East. To the south, it will connect the South West Mainline via new tunnels from Wimbledon, through central London to New Southgate and Tottenham Hale where it will connect with the West Anglia Mainline.

Decentralised Energy: Local renewable and local low-carbon energy sources.

Fluvial (or river) flooding, occurs when the water level in a river or stream rises and overflows the surrounding banks and into neighbouring land.

Green Belt: A designated area of open land around London (or other urban areas). The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green roof: Also known as an eco-roof, living roof, or vegetated roof, is one that is either partially or completely covered in vegetation on top of the human-made roofing structure.

Growth Area : These are distinctive locations with good public transport accessibility. They have a supply of brownfield and underused land and buildings that offer opportunities for inward investment.

Health Impact Assessment (HIA): HIA is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population, or particular groups within it. HIA should be undertaken as early as possible

in the planning application or plan making process to mitigate any potential negative impacts and maximise potential benefits.

Hendon and District Archaeological Society (HADAS): The archaeological society for the London Borough of Barnet. The HADAS was founded in 1961 to find and prove, on the ground, the Saxon origins of Hendon. Since that time the Society has expanded in area, today encompassing the whole of the London Borough of Barnet and its expertise, excavation and research now covers all archaeological periods.

Heritage asset: a valued component of the historic environment which includes buildings, monuments, sites, places, areas or landscapes positively identified as having a degree of historic significance meriting consideration in planning decisions. Heritage assets can be designated (nationally listed), or non-designated where these have been identified by the local authority (including local listing) during the process of decision-making or plan making.

Large scale: residential development over 200 units or a site of 4 hectares or more. Non-residential development over 10,000m²

Lead Local Flood Authority (LLFA): has the responsibility to prepare and maintain a strategy for local flood risk management in their areas. Barnet Council is the LLFA for the London Borough of Barnet.

Live/ Work units: Purpose-built premises, or purposely converted units, comprising a mix of residential and business uses which cannot be classified under a single class within the Use Classes Order.

Locally Significant Industrial Sites (LSIS): Employment sites of significance to Barnet's economy. Occupancy within these sites is generally similar to that within SIL, but is more varied and may include office or trade uses.

Lifetime Neighbourhood: Places where, in view of an ageing society, transport, basic amenities, green spaces, decent toilets, and places to meet and relax, are consciously planned for people of all ages and conditions in mind within easy reach of homes, accessible to all and planned into proposals at the outset.

Major Developments: 10 or more residential units (or if a number is not given, where the area is more than 0.5 hectares), or 1,000 m² (or more) gross commercial floorspace.

Main Town Centre Uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Marginal Abatement Cost (MAC): Is a payment calculated on the amount of air pollution emitted by a development above the appropriate level identified in the Air Quality Neutrality report, using charges identified by DEFRA.

Meanwhile Uses: The temporary use of vacant buildings or land for a socially beneficial purpose including residential use, until such a time that they can be brought back into commercial or residential use again.

Metropolitan Open Land: Extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt and is protected from inappropriate development by land-use planning policies.

Multi-generational Homes

Homes that are designed to provide space for multiple generations to live under one roof.

Neighbourhood Parades and Isolated Shop Units: Neighbourhood Centres and isolated units are located outside of designated town centres. These shops serve a local retail need and play an important social role in the community as well as contributing to the character and function of the local area.

Network Recovery Plan: Barnet Council's £50million investment in roads and pavements between 2015 and 2020. The investment programme covers all aspects of Barnet's highways network from road and pavements to bridges, road marking and crossings.

North Central London Clinical Commissioning Group : Formally established in April 2020 bringing together 5 North London boroughs including LB Barnet. It is a clinically led GP member driven group.

North London Waste Plan (NLWP): The seven North London Local Planning Authorities of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest have jointly prepared the NLWP. The Plan will set out the planning framework for waste management in the North London Boroughs for the next 15 years and will identify sites for waste management use and set out policies for determining waste planning applications.

Open Space: All land in Barnet that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open space, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Opportunity Areas: Areas designated in the London Plan as London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing.

Payday loan shops: A company that lends customers small amounts of money at high interest rates, on the agreement that the loan will be repaid when the borrower receives their next wages.

Playing Field: A playing field is an area containing at least one playing pitch (0.2 ha or more, including run-offs), irrespective of ownership.

Playing Pitches: A playing pitch means a delineated area which, together with any runoff area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015).

Primary Frontages: Frontages comprising a high proportion of retail uses which may include food, drinks, clothing and household goods. Primary frontage is shown on the Polices Map.

Preliminary Risk Assessment (PRA): is used to establish the previous uses of the land under consideration or land nearby or adjacent to the land being considered. It

identifies potential sources of contamination, receptors e.g. groundwater, and pathways that any ground contamination may take.

Public Transport Access Level (PTAL): A detailed measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability.

Registered Social Landlords: Not-for-profit housing providers approved and regulated by the Government through the Homes & Communities Agency that provide homes for people in housing need.

Section 278 Agreement: A legally binding agreement between the Local Highway Authority and the developer to ensure that the work to be carried out on the highway is completed to the standards and satisfaction of the Local Highway Authority.

Section 106 Agreement: a legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal

Small and Medium Enterprises (SMEs): Defined in EU law as enterprises which employ fewer than 250 people and which have an annual turnover not exceeding €50m, and/or an annual balance sheet total not exceeding €43m.

Social Infrastructure: A wide variety of services that are essential to the sustainability and wellbeing of a community such as education facilities, places of worship, health provision, community, cultural, recreation and sports facilities.

Student: A student is a person following a course in higher education as recognised by the office for students.

Studio Flat: Also known as a studio apartment, a small apartment which combines living room, bedroom, and kitchenette into a single room.

Surface water flooding: This type of flooding occurs when the volume of rainwater falling does not drain away through the existing drainage systems or soak into the ground, but lies on or flows over the ground instead.

Sustainable Urban Drainage System (SuDS): An alternative approach from the traditional ways of managing runoff from buildings and hardstanding. They can reduce the total amount, flow and rate of surface water that runs directly to rivers through stormwater systems.

Tall Buildings and Very Tall Buildings: Within Barnet a tall building is defined as having a height of eight storeys or more (equivalent to 26 metres or more above ground level and Very Tall are those of 15 storeys (46 metres or more above ground level).

Transport for London Road Network (TLRN): The Transport for London Road Network is made up of roads that are owned and maintained by Transport for London (TfL). They are the key routes or major arterial roads in London.

UNITAS: Barnet Youth Zone, named by young people as 'Unitas', is an independent charity which will be a purpose-built facility for the borough's young people aged 8 – 19, and up to 25 for those with disabilities.

Water Framework Directive (WFD): is a directive (governmental instruction) which aims to protect and improve the water environment.

West London Orbital: A potential new rail service on existing, underused rail lines in West London as part of the London Overground network. The WLO rail line would run from Hounslow and Kew Bridge towards Hendon and West Hampstead in the north.

15 Appendix C - Replacement of Local Plan Policies

Barnet Local Plan 2012	Draft Barnet Local Plan 2021
CS NPPF Presumption in favour of sustainable development	Local Plan
CS1 - Barnet's place shaping strategy – protection, enhancement and consolidation growth – the Three Strands Approach	GSS01 – Delivering Sustainable Growth
CS2 – Brent Cross – Cricklewood	GSS02 - Brent Cross Growth Area GSS03 - Brent Cross West Growth Area GSS04 - Cricklewood Growth Area
CS3 – Distribution of growth in meeting housing aspirations	GSS05 - Edgware Growth Area GSS06 - Colindale Growth Area GSS07 - Mill Hill East GSS08 - Barnet's District Town Centres GSS09 - Existing & Major New Transport Infrastructure GSS10 - Estate Renewal GSS11 - Major Thoroughfares GSS12 – Car Parks GSS13 – Strategic Parks and Recreation
CS4 – Providing quality homes and housing choice in Barnet	HOU01 – Affordable Housing HOU02 – Housing Mix HOU03 – Residential Conversions and Redevelopment HOU06 – Meeting Other Housing Needs HOU07 - Gypsies, Travellers and Travelling Showpeople
CS5 – Protecting and enhancing Barnet's character to create high quality places	CDH01 – Promoting High Quality Design CDH04 – Tall Buildings
CS6 – Promoting Barnet's town centres	TOW01 – Vibrant Town Centres TOW02 - Development principles in Barnet's Town Centres, Local Centres and Parades TOW03 - Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars TOW04 – Night-Time Economy CDH03 – Public Realm

CS7 – Enhancing and protecting Barnet’s open spaces	ECC04 – Barnet’s Parks and Open Spaces ECC05 – Green Belt and Metropolitan Open Land
CS8 – Promoting a strong and prosperous Barnet	ECY01 – A Vibrant Local Economy
CS9 – Providing safe, effective and efficient travel	TRC01 – Sustainable and Active Travel TRC02 – Transport Infrastructure
CS10 – Enabling inclusive integrated community facilities and uses	CHW01 – Community Infrastructure
CS11 – Improving health and wellbeing in Barnet	CHW02 - Promoting Health and Wellbeing
CS12 – Making Barnet a safer place	CHW03 - Making Barnet a safer place
CS13 – Ensuring the efficient use of natural resources	ECC01 – Mitigating Climate Change ECC02 – Environmental Considerations ECC02A – Water Management
CS14 – Dealing with our waste	ECC01 – Mitigating Climate Change ECC03 – Dealing with Waste
CS15 – Delivering the Core Strategy	Chapter 12 – Delivering the Local Plan
DM01 – Protecting Barnet’s character and amenity	HOU03 – Residential Conversions and Redevelopment CDH01 – Promoting High Quality Design
DM02 – Development standards	CDH01 – Promoting High Quality Design CDH02 – Sustainable and Inclusive Design CDH07 – Amenity Space and Landscaping
DM03 – Accessibility and inclusive design	CDH02 – Sustainable and Inclusive Design
DM04 – Environmental considerations for development	CDH02 – Sustainable and Inclusive Design CDH07 – Amenity Space and Landscaping
DM05 – Tall buildings	CDH04 – Tall Buildings
DM06 – Barnet’s heritage and conservation	CDH08 - Barnet’s Heritage
DM07 – Protecting housing in Barnet	HOU05 - Efficient Use of Barnet’s Housing Stock
DM08 – Ensuring a variety of sizes of new homes to meet housing need	HOU02 – Housing Mix
DM09 – Specialist housing – Houses in Multiple Occupation, student accommodation and housing choice for older people	HOU04 – Specialist Housing
DM10 – Affordable housing contributions	HOU01 – Affordable Housing
DM11 – Development principles for Barnet’s town centres	TOW01 – Vibrant Town Centres TOW02 - Development principles in Barnet’s Town Centres, Local Centres and Parades

DM12 – Maintaining our local centres and parades	TOW01 – Vibrant Town Centres TOW02 - Development principles in Barnet’s Town Centres, Local Centres and Parades
DM13 – Community and education uses	CHW01 – Community Infrastructure
DM14 – New and existing employment space	ECY01 – A Vibrant Local Economy ECY03 – Local Jobs, Skills and Training
DM15 – Green Belt and open spaces	ECC04 – Barnet’s Parks and Open Spaces ECC05 – Green Belt and Metropolitan Open Land
DM16 – Biodiversity	ECC06 – Biodiversity
DM17 – Travel impact and parking standards	TRC01 – Sustainable and Active Travel TRC02 – Transport Infrastructure TRC03 – Parking Management
DM18 – Telecommunications	TRC04 – Digital Communication and Connectivity
N/A	New policy CDH05 – Extensions
N/A	New policy CDH06 – Basements
N/A	New Policy CDH09 - Advertisements
N/A	New policy CDH04 – Protecting Public Houses
N/A	New policy ECY02 – Affordable Workspace

16 Annex 1 – Schedule of Site Proposals

16.1 Background

16.1.1 The Local Plan quantifies the projected level of growth and identifies the supply of sites needed to meet this growth.

16.1.2 The sites identified in the Local Plan Schedule of Proposals are derived from the following sources:

- Nominated through the Call for Sites process by owners and developers seeking to realise development potential. These include public-sector partners such as Transport for London, Middlesex University, NHS, Ministry of Defence, as well as the Council. The sites included in this plan have been assessed as suitable for development;
- Previously identified in the 2006 Unitary Development Plan but not yet developed;
- Allocated in other planning documents adopted by the Council, including Supplementary Planning Documents, Town Centre Frameworks and Planning Briefs.

16.1.3 As part of the evidence gathering for the Local Plan the Council conducted an extensive call for sites in 2017-18. This supported the work on previous calls for sites that took place in 2009, 2010 and 2015.

16.1.4 To be included in the Schedule sites must be assessed as:

- **Deliverable** i.e. it should be available now and offer a suitable location for the proposed use(s) and a good prospect that proposal will be delivered within next five years.
- **Developable** i.e. it should be in a suitable location for the proposed use(s) and there should be a reasonable prospect that it will be available for and could be developed within 15 years.

16.1.5 This extensive period of information gathering has enabled the Council to move forward with a suite of sites following a robust assessment of those nominated. Reasons for rejection include constraints:

- No realistic prospect of the site coming forward for development during the Plan period;
- It was considered important to retain the existing use on this site;
- Development would conflict with other Local Plan policies such as protection of Green Belt and Metropolitan Open Land.

16.1.6 Physical or environmental factors, such as flood risk (as identified in the 2018 West London Strategic Flood Risk Assessment and Barnet's 2021 Strategic Flood Risk Level 2), or conservation areas, are acknowledged as potentially further restraining development capacity, although these constraints are not absolute.

16.1.7 The Schedule updates proposals that have gained planning consent since Reg 18. Such sites along with other planning consents are reflected in the Housing Trajectory.

16.1.8 The sites set out in this document have the potential to be brought forward for development, subject to a suitable development proposal being submitted to and approved by the Council; it should be noted that the Council will not directly carry out the development.

16.2 Assessing Indicative Residential Capacity of Sites

For the purposes of the Local Plan, site capacity assessment has been based on the site size and the public transport accessibility level (PTAL), which is used to determine the range of appropriate dwelling densities for residential development, and thus an indicative number of dwellings.

16.2.1 A density matrix approach to calculate indicative residential capacity has been utilised in order to provide sufficient accuracy in terms of indicative numbers at the plan-making stage. This provides a good basis for a more detailed design led approach as proposals near the planning application stage. For relevant sites on which student halls of residence are expected a figure is included on the ratio that three student rooms are equivalent to one standard housing unit (as per the 2017 London Strategic Housing Market Assessment).

Figure 1: Density Matrix

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban:	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
Urban:	150-250 hr/ha	200-450 hr/ha	200-700 hr/ha
3.8 -4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha
Central:	150-300 hr/ha	300-650 hr/ha	650-1100 hr/ha
3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	140-290 u/ha
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha

2.7-3.0 hr/unit	50-110 u/hr	100–240 u/ha	215–405 u/ha
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Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

- central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 m walking distance of a Metropolitan or Major town centre.
- urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 m walking distance of a district centre or, along main arterial routes
- suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

16.3 Other Uses

16.3.1 Where the site is expected to have uses other than residential, the type of uses are described. In some cases, these uses reflect those already happening on the site, for example commercial retail and offices uses on town centre sites. In other cases, the use type would support the residential development and be suitable to the location, for example a community use could include a creche as part of a large housing delivery.

16.3.2 The use types are expressed as an estimated percentage as of the potential development and are therefore set out and shown as a proportion of total floorspace.

16.4 Relationship of Site Proposals to Other Planning Documents

16.5 Opportunity Area Planning Frameworks/ Area Action Plans/ Local Area Frameworks

16.5.1 The Local Plan for Barnet includes existing opportunity area planning frameworks for Brent Cross-Cricklewood and Colindale, along with a new opportunity area at New Southgate.

16.5.2 The Opportunity Areas are designated within the London Plan as the capital's principal opportunities for accommodating large scale development. The Opportunity Areas are supported by Area Frameworks that set the parameters for development proposals that contribute to regeneration and tackle inequalities as well as the environmental, economic and social barriers that affect the lives of people in the area. Opportunity Areas have the highest expectations for delivering new homes and new jobs as well as supporting infrastructure. Opportunity Areas are the largest strategic locations in the Key Diagram.

16.5.3 The following Barnet areas are designated (or were previously designated in the case of Mill Hill East) in the London Plan.

Brent Cross Cricklewood – The London Plan designates Brent Cross Cricklewood as an Opportunity Area. The planning framework for Brent Cross Cricklewood is set out in the Area Development Framework adopted as Supplementary Planning Guidance in December 2005. Formerly a Regeneration Area Brent Cross / Cricklewood is now designated as three individual Growth Areas in Local Plan: Brent Cross, Brent Cross West and Cricklewood Town Centre.

Colindale-Burnt Oak – The London Plan designates Colindale as an Opportunity Area. The planning framework for Colindale is set out in the Area Action Plan adopted in March 2010. Unimplemented allocations in the AAP remain part of the Local Plan Schedule of Proposals. Formerly a Regeneration Area, Colindale is now designated as a Growth Area in the Local Plan.

New Southgate – The London Plan designates New Southgate as an Opportunity Area. A planning framework will be produced jointly with the GLA, LB Enfield and LB Haringey that will further assess the development potential of this area.

Mill Hill East – The planning framework for Mill Hill East is set out in the Area Action Plan adopted in January 2009. Unimplemented allocations in the AAP remain part of the Local Plan. Formerly an Area for Intensification, Mill Hill East is now identified as an area for good suburban growth in the Local Plan.

Local Area Frameworks – The frameworks provide the basis for managing and promoting positive change in identified town centres. Unimplemented key opportunity sites identified in these documents are a source for the Local Plan Schedule of Proposals, in particular the North Finchley Town Centre Framework SPD (2018) and New Barnet Town Centre Framework (2010).

16.6 Growth Areas

16.6.1 The Growth Areas are distinctive locations with good public transport accessibility. They have a supply of brownfield and underused land and buildings that offer opportunities for inward investment. Growth Areas, together with the District Town Centres, provide identified developable and deliverable sites with substantial capacity for new homes, jobs and infrastructure. Smaller and more focused Growth Areas can also be within Opportunity Areas. Through planning frameworks parameters can be set for ensuring good place-making and responding to the individual characteristics of Growth Areas and individual Town Centres. Barnet's Growth Areas are shown on Map 2, the Key Diagram.

16.7 Town Centres

16.7.1 Boundaries of Town Centres were established in 2012 and have not been changed. Town centre sites are included as those that are within 400 metres of a Town Centre boundary.

16.8 Major Thoroughfares

16.8.1 Major Thoroughfares are identified in Map 2 of the Local Plan. Major Thoroughfare sites are identified as those along an identified Major Thoroughfare and that are not within a Growth Area or Town Centre.

16.9 Estate Renewal and Infill

16.9.1 Sites are identified which involve the renewal and infill development of existing housing estates. The residential figures for Estate Renewal are shown on the basis of net increase.

16.10 Major Public Transport Infrastructure

16.10.1 Major Public Transport Infrastructure sites are identified as within 400 metres of an existing or new public transport hub and which have not otherwise been identified as within Growth Areas, Town Centres or Major Thoroughfares.

16.11 North London Waste Plan

16.11.1 To deliver sustainable waste management the North London Waste Plan allocates sites as the principal locations considered suitable for waste facilities. Sites for waste management can also be allocated in the Local Plan.

16.12 Neighbourhood Plans

16.12.1 Neighbourhood Plans can allocate sites of local, non-strategic importance.

16.13 Local Plan Policies Map

16.13.1 The Local Plan Policies Map provides the spatial expression of the Council's planning policies.

16.14 Assessment of Development Proposals on Sites

16.14.1 The Council will apply adopted Local Plan Policy and developer requirements together with the London Plan and national planning guidance when future planning proposals come forward on Local Plan sites, including affordable housing obligations. When bringing forward development proposals regard should be had to the Local Plan policies as a whole. Planning applications should also comply with the Council's approved validation requirements.

16.14.2 Proposals on sites over one hectare will require a screening opinion for Environmental Impact Assessment to accompany the submission of any planning applications.

4. List of Sites – Summary Table

Site No.	Site	Ward	Address	Indicative Units	Non-residential Uses
1	Former Church Farm Leisure Centre	Brunswick Park	Burlington Rise, Brunswick Park, EN4 8XE	12	-
2	North London Business Park	Brunswick Park	Brunswick Park Rd, Brunswick Park, N11 1NP	1,350	A school, multi-use sports pitch, employment and associated car parking
3	Osidge Lane Community Halls	Brunswick Park	Osidge Lane, Southgate, N14 5DU	16	Community uses, school access and retained parking
4	Osidge Library & Health Centre	Brunswick Park	Brunswick Park Rd & Osidge Lane, Brunswick Park, N11 1EY	16	Replacement library and health centre
5	Edgware Hospital (Major Thoroughfare)	Burnt Oak	Edgware Rd, Burnt Oak, HA8 0AD	366	Hospital continuing in use, with associated car parking
6	Watling Avenue car park & market (Burnt Oak Town Centre)	Burnt Oak	Barnfield Rd, Burnt Oak, HA8 0AY	160	40% mixed uses (station building, retail and car parking)
7	Beacon Bingo (Cricklewood Growth Area)	Childs Hill	200 Cricklewood Broadway, Cricklewood, NW2 3DU	132	Leisure uses
8	Broadway Retail Park (Cricklewood Growth Area)	Childs Hill	Cricklewood Lane, Cricklewood, NW2 1ES	1,007	Commercial - retail and community
9	Colindeep Lane (adjacent to Northern Line) (Colindale Growth Area)	Colindale	Colindeep Lane, Colindale, NW9 6RY	128	-
10	Douglas Bader Park Estate (Estate Regeneration and Infill)	Colindale	Clayton Field, Colindale, NW9 5SE	478	Small quantum of community facilities and commercial (retail)
11	KFC/ Burger King Restaurant	Colindale	Edgware Road, NW9 5EB	162	Commercial uses (restaurant) and takeaway
12	McDonald's Restaurant	Colindale	157 Colindeep Lane, NW9 6BD	175	Commercial uses (restaurant) and takeaway
13	Public Health England	Colindale	61 Colindale Avenue, NW9 5EQ/HT	794	Community
14	Sainsburys The Hyde (Major Thoroughfare)	Colindale	Edgware Rd, The Hyde, NW9 6JX	1,309	Commercial (retail), community and car parking
15	Tesco Coppetts Centre (Major Thoroughfares)	Coppetts	Colney Hatch Lane, Friern Barnet, N11 0SH	397	Commercial (retail), community and car parking.

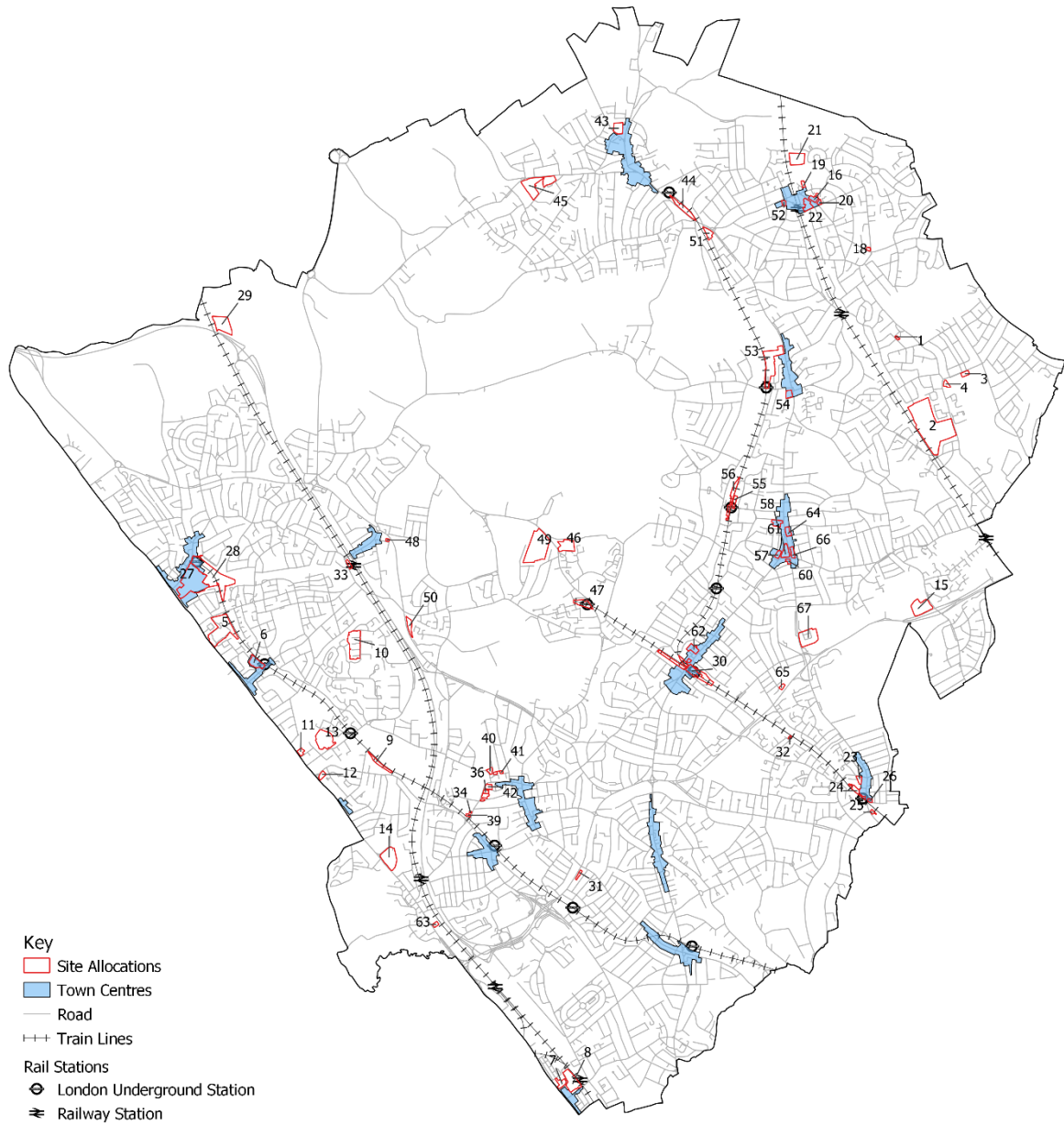
16	45-69 East Barnet Rd (New Barnet town centre)	East Barnet	45-69 East Barnet Rd, New Barnet, EN4 8RN	110	Commercial (retail and office)
17			Site number retained to provide consistency of numbering between the Plan versions.		-
18	Former East Barnet Library	East Barnet	85 Brookhill Rd, New Barnet EN4 8SG	12	Community
19	East Barnet Shooting Club (New Barnet Town Centre)	East Barnet	Victoria Rd New Barnet EN4 9SH	43	-
20	Fayer's Building Yard & Church (New Barnet Town Centre)	East Barnet	63-77 East Barnet Rd & 15-17 Margaret Rd, New Barnet, EN4 9NR	25	Community
21	New Barnet gasholder (New Barnet Town Centre)	East Barnet	Albert Rd, New Barnet, EN4 9SH	201	Community
22	Sainsburys (New Barnet Town Centre)	East Barnet	66 East Barnet Rd, New Barnet, EN4 8RQ	199	Commercial (retail and office) and car parking.
23	Bobath Centre (East Finchley Town Centre)	East Finchley	250 East End Rd, East Finchley, N2 8AU	25	Community.
24	East Finchley station car park (East Finchley Town Centre)	East Finchley	High Rd East, Finchley, N2 0NW	135	Commercial (office) and public car parking
25	East Finchley substation (East Finchley Town Centre)	East Finchley	High Rd, East Finchley, N2 0NL	23	-
26	Park House (East Finchley Town Centre)	East Finchley	16 High Rd, East Finchley, N2 9PJ	19	Community
27	Edgware town centre (Edgware Growth Area)	Edgware	Station Rd, Edgware, HA8	2,379	Commercial (retail and office), entertainment and community
28	Edgware underground & bus stations (Edgware Growth Area)	Edgware	Station Rd, Edgware, HA8 7AW	2,317	Transport, commercial (retail and office) and community
29	Scratchwood Quarry	Edgware	NW7 3JA	-	Waste
30	Finchley Central Station (Finchley Central/ Church End Town Centre)	Finchley Church End	Squires Lane/ Nether St/ Crescent St, Finchley N12 (railway verges and airspace above tracks and Finchley Central station)	556	Transport, commercial (retail and offices) and car parking
31	Brentmead Place (Major Thoroughfare)	Golders Green	1-6 Brentmead Place (North Circular Road), Golder's Green, NW11 9JG	46	-




32	Manor Park Road car park	Golders Green	72-76 Manor Park Rd, East Finchley, N2 0SJ	7	-
33	Bunns Lane Car park (Mill Hill Town Centre)	Hale	Bunns Lane, Mill Hill, NW7 2AA	43	Hotel and car parking
34	Burroughs Gardens Car park (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 4AU	9	-
35	Egerton Gardens car park (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 8BD	23 (69 student halls of residence)	-
36	Fenella (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 4BS	60 (180 student halls of residence)	Educational
37			Site number retained to provide consistency of numbering between the Plan versions.		
38	Ravensfield House (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 4BT	84 (252 student halls of residence)	Educational uses.
39	The Burroughs car park (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 4AR	21	-
40	Meritage Centre	Hendon	28-46 Meritage Centre, Church End Hendon NW4 4JT	36 (108 student halls of residence)	Community
41	PDSA and Fuller St car park	Hendon	The Burroughs, Hendon, NW4 4BE	12 (36 student halls of residence)	Community
42	Usher Hall (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 4HE	39 (117 student halls of residence)	-
43	Army Reserve Depot (Chipping Barnet Town Centre)	High Barnet	St Alban's Rd, Chipping Barnet, EN5 4JX	193	Commercial (office) and community
44	High Barnet Station (Chipping Barnet Town Centre)	High Barnet	Great North Rd, Chipping Barnet, EN5 5P	292	Public car parking and employment. Designated within UDP (2006) as Site 26 supporting commercial (office), hotel and leisure.
45	Whalebones Park	High Barnet	Wood St, Chipping Barnet, EN5 4BZ	149	Community facilities and local green space
46	IBSA House (Mill Hill Growth Area)	Mill Hill	The Ridgeway, Mill Hill, NW7 1RN	197	
47	Mill Hill East Station (Mill Hill Growth Area)	Mill Hill	Bittacy Hill, Mill Hill, NW7 1BS – airspace above and land adjoining station	127	Rail infrastructure and car parking

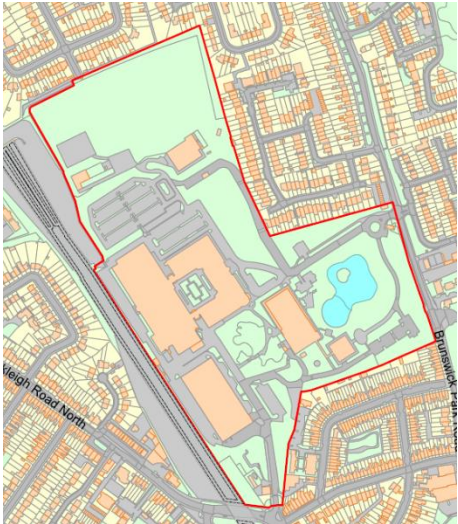

48	Mill Hill Library	Mill Hill	Hartley Avenue, NW7 2HX	19	Community
49	Watchtower House & Kingdom Hall (Mill Hill Growth Area)	Mill Hill	The Ridgeway, Mill Hill, NW7 1RS/ 1RL	224	Open Green Belt and community uses
50	Watford Way & Bunns Lane (Major Thoroughfare)	Mill Hill	Adjacent to Watford Way, Mill Hill, NW7 2EX	105	-
51	Great North Road Local Centre (Major Thoroughfare)	Oakleigh	Great North Rd, New Barnet, EN5 1AB	84	Cinema and public house
52	Kingmaker House (New Barnet Town Centre)	Oakleigh	15 Station Rd, New Barnet, EN5 1NW	61	Commercial (office)
53	Allum Way (Whetstone Town Centre)	Totteridge	Totteridge & Whetstone station/ High Rd/ Downland Close/ Allum Way, Whetstone, N20	600	TfL rail infrastructure, commercial (office and light industrial), community and car parking.
54	Barnet House (Whetstone Town Centre)	Totteridge	1255 High Rd, Whetstone, N20 0EJ	139	Commercial (office) and community
55	Woodside Park Station east (Existing Transport Infrastructure)	Totteridge	Woodside Park Rd, Woodside Park, N12 8RT	95	Car parking
56	Woodside Park Station West (Existing Transport Infrastructure)	Totteridge	Station Approach, Woodside Park, N12 8RT	356	-
57	309-319 Ballards Lane (North Finchley Town Centre)	West Finchley	309-319 Ballards Lane, North Finchley, N12 8LY	130	Commercial (retail and office) and community
58	811 High Rd & Lodge Lane car park (North Finchley Town Centre)	West Finchley	811 High Rd & Lodge Lane, North Finchley, N12 8JT	132	Commercial (retail and office) and public car parking
59	Central House (Finchley/ Church End Town Centre)	West Finchley	1 Ballards Lane, Finchley N3 1UX	48	Commercial (retail and office)
60	Finchley House (key site 3) (North Finchley Town Centre)	West Finchley	High Road & Kingsway North Finchley N12 0BT	202	Commercial (office) and community
61	Tally Ho Triangle (key site 1) (North Finchley Town Centre)	West Finchley	High Rd, Ballard's Lane & Kingsway, North Finchley, N12 0GA/ OGP	281	Commercial (retail, and office), leisure, transport, car parking and community facilities
62	Tesco Finchley (Central Finchley/ Church End Town Centre)	West Finchley	21-29 Ballard's Lane, Finchley, N3 1XP	170	Commercial (retail and office) and car parking
63	Philex House (Major Thoroughfare)	West Hendon	110-124 West Hendon Broadway, West Hendon, NW9 7DW	48	-


64	744-776 High Rd (North Finchley Town Centre)	Woodhouse	744-776 High Rd, North Finchley, N12 9QG	175	Commercial (retail and office)
65	Barnet Mortuary (former)	Woodhouse	Dolman Close Finchley N3 2EU	20	-
66	East Wing (key site 4) (North Finchley Town Centre)	Woodhouse	672-708 High Rd North Finchley N12 9PT/9QL	125	Commercial (retail and office) and cultural
67	Great North Leisure Park (Major Thoroughfare)	Woodhouse	High Rd, Friern Barnet, N12 0GL	352	Sports and leisure, commercial (restaurants and cafes), community and car parking

5.0 Borough Sites Map

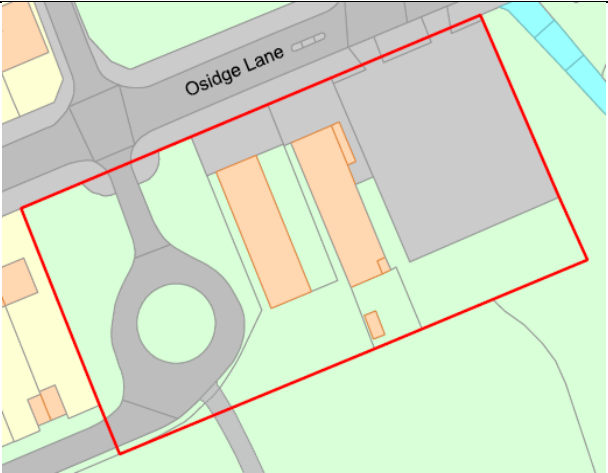






Site No. 1	Former Church Farm Leisure Centre			
Site Address:	Burlington Rise, Brunswick Park, EN4 8XE			
	Ward:	Brunswick Park		
	PTAL 2019:	1B		
	PTAL 2031:	1B		
	Site Size:	0.13 ha		
	Ownership:	Council		
	Site source:	Council assets disposal programme		
	Context type:	Urban		
	Existing or most recent site use/s:	Swimming pool/ leisure centre		
	Development timeframe:	0-5 years		
	Planning designations:	Archaeological Priority Area		
Relevant planning applications:	None			
	Site description:	The site is immediately adjacent to Grade II listed buildings, including the water tower, 2A and 3 Church Farm School, and the nearby St Mary's Church. Surrounding buildings are of 2-3 storeys. The site formerly included a Council-owned public swimming pool and leisure centre (replaced in 2019-20 by the new leisure centre in Victoria Recreation Ground, New Barnet). The site adjoins the Mill Hill County Secondary School.		
	Applicable Draft Local Plan policies:	GSS01, HOU01, HOU02, CDH01, CDH02, CDH03, CDH08, CHW01, CHW02, TRC01, TRC03		
	Proposed uses/ allocation (as a proportion of floorspace):	100% Residential		
	Indicative residential capacity:	12		
	Justification:	The leisure centre has been replaced by the new facility at Victoria Recreation Ground. The location and context make this site suitable for residential development.		
				




Site requirements and development guidelines:	The adjacent and nearby statutorily listed buildings must be carefully considered in any redevelopment of the site, and proposals must also respect the scale and form of the surrounding buildings, including the nearby listed St Mary’s Church. Proposals must not affect the safe running of the neighbouring school.																							
Site No. 2	North London Business Park																							
Site Address:	Brunswick Park Rd, Brunswick Park, N11 1NP																							
	<table border="1"> <tr><td>Ward:</td><td>Brunswick Park</td></tr> <tr><td>PTAL 2019:</td><td>1B</td></tr> <tr><td>PTAL 2031:</td><td>1A/1B</td></tr> <tr><td>Site Size:</td><td>16.49 ha</td></tr> <tr><td>Ownership:</td><td>Private</td></tr> <tr><td>Site source:</td><td>Call for sites, Planning Brief</td></tr> <tr><td>Context type:</td><td>Urban</td></tr> <tr><td>Existing or most recent site use/s:</td><td>Offices, school</td></tr> <tr><td>Development timeframe:</td><td>6-10 years</td></tr> <tr><td>Planning designations:</td><td>Locally Significant Industrial Site</td></tr> <tr><td>Relevant planning applications:</td><td>15/07932/OUT (granted on appeal) 1,350 residential units and mixed uses.</td></tr> </table>	Ward:	Brunswick Park	PTAL 2019:	1B	PTAL 2031:	1A/1B	Site Size:	16.49 ha	Ownership:	Private	Site source:	Call for sites, Planning Brief	Context type:	Urban	Existing or most recent site use/s:	Offices, school	Development timeframe:	6-10 years	Planning designations:	Locally Significant Industrial Site	Relevant planning applications:	15/07932/OUT (granted on appeal) 1,350 residential units and mixed uses.	
Ward:	Brunswick Park																							
PTAL 2019:	1B																							
PTAL 2031:	1A/1B																							
Site Size:	16.49 ha																							
Ownership:	Private																							
Site source:	Call for sites, Planning Brief																							
Context type:	Urban																							
Existing or most recent site use/s:	Offices, school																							
Development timeframe:	6-10 years																							
Planning designations:	Locally Significant Industrial Site																							
Relevant planning applications:	15/07932/OUT (granted on appeal) 1,350 residential units and mixed uses.																							
	Site description:	A large site currently in use for low-rise office buildings, extensive car parking and a secondary school. Designation as a Locally Significant Industrial Site reflects existing office uses. There are also large areas of green landscaping. The main line railway runs along the western boundary of the site, and on other sides is surrounded by suburban housing.																						
	Applicable Draft Local Plan policies:	GSS01, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CHW01, CHW02, ECY01, ECY02, ECY03, TRC01, TRC02, TRC03																						
	Proposed uses/ allocation (as a proportion of floorspace):	Residential with a school, multi-use sports pitch, employment and associated car parking.																						
	Indicative residential capacity:	1,350 (15/07932/OUT)																						

		<p>Justification:</p>	<p>The site has received planning permission (ref 15/07932/OUT).</p>
<p>Site requirements and development guidelines:</p>	<p>The Council seeks comprehensive redevelopment through a residential led scheme that integrates with the surrounding area. There should also be provision of education, replacement nursery and other community uses; affordable and flexible employment floorspace for SMEs; a replacement sports pitch to serve both the new development and the surrounding area; and provision of a significant quantity of public open space. Access to the site from surrounding areas must improve both permeability and security, while avoiding vehicular traffic using the site as a through-route. The scale provides an opportunity for the redevelopment to define the site's own character, and to increase local permeability and integration. The design will need to consider the amenity of surrounding suburban housing.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required. The detailed drainage strategy should be submitted with the planning application.</p> <p>For further information refer to the North London Business Park (2016) Planning Brief.</p>		



<p>Site No. 3</p>	<p>Osidge Lane Community Halls</p>			
<p>Site Address:</p>	<p>Osidge Lane, Southgate, N14 5DU</p>			
		<p>Ward:</p>	<p>Brunswick Park</p>	
		<p>PTAL 2019:</p>	<p>2</p>	
		<p>PTAL 2031:</p>	<p>2</p>	
		<p>Site Size:</p>	<p>0.45 ha</p>	
		<p>Ownership:</p>	<p>Council</p>	
		<p>Site source:</p>	<p>Council assets disposal programme</p>	
		<p>Context type:</p>	<p>Urban</p>	


	<table border="1"> <tr> <td>Existing or most recent site use/s:</td> <td>Community facilities, associated car park, access road to primary school</td> </tr> <tr> <td>Development timeframe:</td> <td>0-5 years</td> </tr> <tr> <td>Planning designations:</td> <td>Metropolitan Open Lan (MOL)</td> </tr> <tr> <td>Relevant planning applications:</td> <td>None</td> </tr> </table>		Existing or most recent site use/s:	Community facilities, associated car park, access road to primary school	Development timeframe:	0-5 years	Planning designations:	Metropolitan Open Lan (MOL)	Relevant planning applications:	None							
Existing or most recent site use/s:	Community facilities, associated car park, access road to primary school																
Development timeframe:	0-5 years																
Planning designations:	Metropolitan Open Lan (MOL)																
Relevant planning applications:	None																
	<table border="1"> <tr> <td>Site description:</td> <td colspan="2">The site contains two community halls, parking for Brunswick Park, and an access road to a primary school and for maintenance access to Brunswick Park. The site is close to Pymmes Brook and the northern edge of the site lies partly within Flood Zone 3. The site includes a small area of Metropolitan Open Lan (MOL) along the south part of the site. A Site of Importance for Nature Conservation (SINC) is adjacent, and Green Chain which surrounds Pymmes Brook. Buildings on Osidge Lane are low-rise residential dwellings.</td> </tr> <tr> <td>Applicable Draft Local Plan policies:</td> <td colspan="2">GSS01, GSS12, HOU01, HOU02, CDH01, CDH02, CHW01, CHW02, ECC02, ECC04, TRC01, TRC03</td> </tr> <tr> <td>Proposed uses/ allocation (as a proportion of floorspace):</td> <td colspan="2">25% residential floorspace with 75% floorspace for community uses, school access and retained parking</td> </tr> <tr> <td>Indicative residential capacity:</td> <td colspan="2">16</td> </tr> <tr> <td>Justification:</td> <td colspan="2">This site is in a residential area and is in a relatively low-intensity use, providing an opportunity for a more effective use of the space.</td> </tr> </table>		Site description:	The site contains two community halls, parking for Brunswick Park, and an access road to a primary school and for maintenance access to Brunswick Park. The site is close to Pymmes Brook and the northern edge of the site lies partly within Flood Zone 3. The site includes a small area of Metropolitan Open Lan (MOL) along the south part of the site. A Site of Importance for Nature Conservation (SINC) is adjacent, and Green Chain which surrounds Pymmes Brook. Buildings on Osidge Lane are low-rise residential dwellings.		Applicable Draft Local Plan policies:	GSS01, GSS12, HOU01, HOU02, CDH01, CDH02, CHW01, CHW02, ECC02, ECC04, TRC01, TRC03		Proposed uses/ allocation (as a proportion of floorspace):	25% residential floorspace with 75% floorspace for community uses, school access and retained parking		Indicative residential capacity:	16		Justification:	This site is in a residential area and is in a relatively low-intensity use, providing an opportunity for a more effective use of the space.	
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Proposed uses/ allocation (as a proportion of floorspace):	25% residential floorspace with 75% floorspace for community uses, school access and retained parking																
Indicative residential capacity:	16																
Justification:	This site is in a residential area and is in a relatively low-intensity use, providing an opportunity for a more effective use of the space.																
<p>Site requirements and development guidelines:</p>	<p>Evidence must be provided that the community halls are no longer required or will be replaced at a suitable location. The site is partly in Flood Zone 3 and proposals must, with reference to the SFRA Level 2, demonstrate how flood risk will be managed and mitigated. Development should avoid losing openness of the MOL designated area. Proposals must take into consideration that a critical Thames Water trunk sewer runs through or close to this site. Vehicular access to the primary school and for Brunswick Park must be maintained, reducing the developable area at the west of the site. Proposed designs must take into consideration the low-rise (2-3 storey) residential context.</p>																




Site No. 4	Osidge Library & Health Centre			
Site Address:	Brunswick Park Rd & Osidge Lane, Brunswick Park, N11 1EY			
	Ward:	Brunswick Park		
	PTAL 2019:	1B/ 2		
	PTAL 2031:	1B/ 2		
	Site Size:	0.39 ha		
	Ownership:	Council		
	Site source:	Council assets disposal programme		
	Context type:	Urban		
	Existing or most recent site use/s:	Public library and health centre with associated car parking		
	Development timeframe:	0-5 years		
	Planning designations:	None		
Relevant planning applications:	None			
	Site description:	The existing uses include a health centre and library which are essential community infrastructure.		
		The surrounding buildings are of a low-rise residential nature. The site is situated on a prominent corner location and includes attractive, mature trees as part of a landscaped area.		
	Applicable Draft Local Plan policies:	GSS01, HOU01, HOU02, CDH01, CDH02, CHW01, CHW02, TRC01, TRC03		
	Proposed uses/ allocation (as a proportion of floorspace):	50% residential floorspace with 50% floorspace to provide a replacement library and health centre		
	Indicative residential capacity:	16		
	Justification:	This site is in a residential area and is in a relatively low-intensity use, providing an opportunity for a more effective use of the space.		
	Site requirements and development guidelines:	The health centre and library are essential community infrastructure and any proposal must re-provide either on-site or in a comparable replacement site. Community facilities will need to be provided on the ground floor. Any proposal must take into consideration the low-rise residential nature of surrounding buildings and avoid overlooking the neighbouring primary school. Proposal must address in design terms the site's prominent corner location in the local urban context , including retention of the mature trees as part of a landscaped area. The parking requirements must be assessed as part of any proposal.		

Site No. 5	Edgware Hospital (Major Thoroughfare)																							
Site Address:	Edgware Rd, Burnt Oak, HA8 0AD																							
	<table border="1"> <tr> <td>Ward:</td> <td>Burnt Oak</td> </tr> <tr> <td>PTAL 2019:</td> <td>3</td> </tr> <tr> <td>PTAL 2031:</td> <td>3</td> </tr> <tr> <td>Site Size:</td> <td>2.87 ha</td> </tr> <tr> <td>Ownership:</td> <td>Public (NHS)</td> </tr> <tr> <td>Site source:</td> <td>Call for sites</td> </tr> <tr> <td>Context type:</td> <td>Urban</td> </tr> <tr> <td>Existing or most recent site use/s:</td> <td>Hospital</td> </tr> <tr> <td>Development timeframe:</td> <td>6-10 years</td> </tr> <tr> <td>Planning designations:</td> <td>Site of Borough Importance for Nature Conservation</td> </tr> <tr> <td>Relevant planning applications:</td> <td>None</td> </tr> </table>	Ward:	Burnt Oak	PTAL 2019:	3	PTAL 2031:	3	Site Size:	2.87 ha	Ownership:	Public (NHS)	Site source:	Call for sites	Context type:	Urban	Existing or most recent site use/s:	Hospital	Development timeframe:	6-10 years	Planning designations:	Site of Borough Importance for Nature Conservation	Relevant planning applications:	None	
Ward:	Burnt Oak																							
PTAL 2019:	3																							
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Existing or most recent site use/s:	Hospital																							
Development timeframe:	6-10 years																							
Planning designations:	Site of Borough Importance for Nature Conservation																							
Relevant planning applications:	None																							
	<table border="1"> <tr> <td data-bbox="855 933 1003 1114">Site description:</td> <td colspan="2" data-bbox="1003 933 2054 1114">An NHS hospital on a relatively low-density site, with buildings of 1-2 storeys and large areas of surface car parking. Much of the site is in Flood Zone 2 and a significant portion within Zone 3a; while surrounding Silk Stream is Zone 3b (functional floodplain). A Site of Borough Importance for Nature Conservation lies along the Silk Stream. The site is on the A5 Edgware Road which in this section is low-rise in character, with retail and office uses. To the north and south are 3-4 storey residential blocks, while a railway line is to the rear. Burnt Oak Station is within approximately ½ km.</td> </tr> <tr> <td data-bbox="855 1118 1133 1203">Applicable Draft Local Plan policies:</td> <td colspan="2" data-bbox="1133 1118 2054 1203">GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CHW01, CHW02, ECC02, ECC02A, ECC06, TRC01, TRC03</td> </tr> <tr> <td data-bbox="855 1208 1265 1273">Proposed uses/ allocation (as a proportion of floorspace):</td> <td colspan="2" data-bbox="1265 1208 2054 1273">75% of the site by floorspace to continue in use as a hospital, with associated car parking; with 25% of site by floorspace to be residential.</td> </tr> <tr> <td data-bbox="855 1278 1265 1321">Indicative residential capacity:</td> <td colspan="2" data-bbox="1265 1278 2054 1321">366</td> </tr> <tr> <td data-bbox="855 1326 1133 1383">Justification:</td> <td colspan="2" data-bbox="1133 1326 2054 1383">There is potential to make more efficient use of this relatively low-density location for housing while maintaining the hospital uses on site.</td> </tr> </table>			Site description:	An NHS hospital on a relatively low-density site, with buildings of 1-2 storeys and large areas of surface car parking. Much of the site is in Flood Zone 2 and a significant portion within Zone 3a; while surrounding Silk Stream is Zone 3b (functional floodplain). A Site of Borough Importance for Nature Conservation lies along the Silk Stream. The site is on the A5 Edgware Road which in this section is low-rise in character, with retail and office uses. To the north and south are 3-4 storey residential blocks, while a railway line is to the rear. Burnt Oak Station is within approximately ½ km.		Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CHW01, CHW02, ECC02, ECC02A, ECC06, TRC01, TRC03		Proposed uses/ allocation (as a proportion of floorspace):	75% of the site by floorspace to continue in use as a hospital, with associated car parking; with 25% of site by floorspace to be residential.		Indicative residential capacity:	366		Justification:	There is potential to make more efficient use of this relatively low-density location for housing while maintaining the hospital uses on site.							
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Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CHW01, CHW02, ECC02, ECC02A, ECC06, TRC01, TRC03																							
Proposed uses/ allocation (as a proportion of floorspace):	75% of the site by floorspace to continue in use as a hospital, with associated car parking; with 25% of site by floorspace to be residential.																							
Indicative residential capacity:	366																							
Justification:	There is potential to make more efficient use of this relatively low-density location for housing while maintaining the hospital uses on site.																							

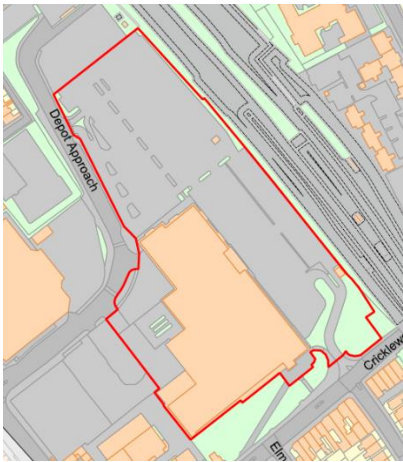

Site requirements and development guidelines:	<p>The hospital will continue in operational use and full unrestricted access must be maintained. Development should avoid those parts of the site in Flood Zone 3b (functional flood plain). Proposals should refer to the SFRA Level 2 for flood risk avoidance and mitigation measures. The opportunity to remove obsolete weirs at the confluence of the Silk Stream and Deans Brook in northern part of site should be considered. The designated SINC must be protected. Opportunities should be sought to improve biodiversity along the Silk Stream, with a 10 meter buffer reserved along the waterway corridor. Better public access along the Silk Stream should be provided, linking together with the north-south pathway which runs between Deansbrook Road and Watling Avenue along the eastern edge of the site. Connectivity for the Barnet Loop should be explored, with reference to Barnet’s Long Term Transport Strategy (LTTS).</p> <p>The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.</p> <p>The site should be subject to an archaeological assessment.</p> <p>This location may be suitable for a tall building; further guidance will be provided by the Building Heights SPD. Any tall building should be located away from Silk Stream main river.</p>
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Site No. 6	Watling Avenue car park & market (Burnt Oak Town Centre)		
Site Address:	Barnfield Rd, Burnt Oak, HA8 0AY		
	Ward:	Burnt Oak	
	PTAL 2019:	5	
	PTAL 2031:	5	
	Site Size:	1.47 ha	
	Ownership:	Public (Council and TfL)	
	Site source:	Call for sites, UDP	
	Location type:	Urban	
	Existing or most recent site use/s:	Car park, station building, shopping parade and market	
	Development timeframe:	5-10 years	
Planning designations:	Burnt Oak Town Centre; Site of Borough Importance for Nature Conservation; Watling Estate Conservation Area		
			

	Relevant planning applications:	None	
	Site description:	<p>The site is predominantly public car parking (227 spaces), with a portion given over to a semi-permanent market. An extensive area to the north of the site is undeveloped and overgrown with trees and shrubs. The southern part of the site lies along Watling Avenue and includes part of Burnt Oak Station and a retail parade of 2-storey, inter-war era buildings, designated as a Primary Retail Frontage. The site is within Burnt Oak Town Centre and the Watling Estate Conservation Area. The Silk Stream wraps around the western edge and much of the site is within Flood Zone 3, with a significant portion of the site in Zone 3b (functional flood plain). A Site of Borough Importance for Nature Conservation lies along the watercourse. The Northern Line is along the eastern site boundary, with the Underground and bus routes providing public transport access.</p>	
	Applicable Draft Local Plan policies:	GSS01, GSS08, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, TOW03, CHW02, ECC02, ECC06, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	80% residential floorspace with 20% of floorspace for mixed uses including the station building, commercial (E uses) and car parking.	
	Indicative residential capacity:	160	
	Justification:	The location is highly accessible and has potential for significant intensification. Development should avoid those parts of the site at highest flood risk.	
Site requirements and development guidelines:	<p>The Flood Zone 3 covering much of the site means that proposals must be subject to the sequential and exception tests and demonstrate how flood risk will be managed and mitigated; the SFRA Level 2 sets out mitigation measures. Development should be located away from those parts of the site at the highest level of flood risk. Proposals must retain town centre uses along the Primary Retail Frontage. Design proposals must also consider the conservation area status ensure protection of the mature trees designated SINC. Proposals should seek to retain the areas of greenery along the Silk Stream and to the northern part of the site to improve biodiversity and as locations for SuDS. Opportunities for public access along the Silk Stream should be fully explored, along with improvements to the footpath running northwards towards Deansbrook Road. Connectivity for the Barnet Loop should be explored, with reference to Barnet’s Long Term Transport Strategy (LTTS).</p> <p>The site should be subject to an archaeological assessment. Public car parking requirements must be assessed and re-provide as needed. TFL are seeking an improved station interchange and step-free access and proposals may be required to make a planning contribute towards this.</p> <p>The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan.</p> <p>The adjacent Northern Line runs through the night on Friday and Saturday and noise levels must be mitigated.</p>		

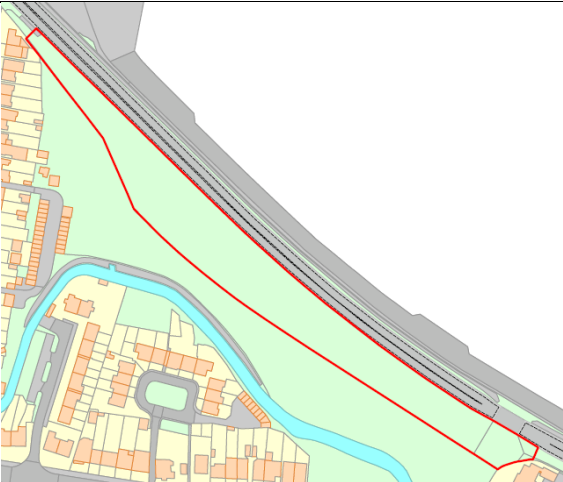


Site No. 7	Beacon Bingo (Cricklewood Growth Area)																								
Site Address:	200 Cricklewood Broadway, Cricklewood, NW2 3DU																								
	<table border="1"> <tr><td>Ward:</td><td>Childs Hill</td></tr> <tr><td>PTAL 2019:</td><td>5</td></tr> <tr><td>PTAL 2031:</td><td>6A</td></tr> <tr><td>Site Size:</td><td>0.47 ha</td></tr> <tr><td>Ownership:</td><td>Private</td></tr> <tr><td>Site source:</td><td>Call for sites</td></tr> <tr><td>Context type:</td><td>Central</td></tr> <tr><td>Existing or most recent site use/s:</td><td>Bingo hall</td></tr> <tr><td>Development timeframe:</td><td>6-10 years</td></tr> <tr><td>Planning designations:</td><td>Archaeological Priority Area</td></tr> <tr><td>Relevant planning applications:</td><td>None</td></tr> </table>	Ward:	Childs Hill	PTAL 2019:	5	PTAL 2031:	6A	Site Size:	0.47 ha	Ownership:	Private	Site source:	Call for sites	Context type:	Central	Existing or most recent site use/s:	Bingo hall	Development timeframe:	6-10 years	Planning designations:	Archaeological Priority Area	Relevant planning applications:	None		
Ward:	Childs Hill																								
PTAL 2019:	5																								
PTAL 2031:	6A																								
Site Size:	0.47 ha																								
Ownership:	Private																								
Site source:	Call for sites																								
Context type:	Central																								
Existing or most recent site use/s:	Bingo hall																								
Development timeframe:	6-10 years																								
Planning designations:	Archaeological Priority Area																								
Relevant planning applications:	None																								
	<table border="1"> <tr> <td data-bbox="853 852 1003 970">Site description:</td> <td colspan="3" data-bbox="1003 852 2054 970">The bingo hall occupies a prominent corner location on Cricklewood Broadway. The site is adjacent to the northern boundary of Cricklewood Town Centre. Cricklewood Broadway is characterised by a diverse range of buildings, including late 19th century frontages of 2-4-storeys with retail and residential uses. The site is close to Cricklewood Station.</td> </tr> <tr> <td data-bbox="853 970 1133 1062">Applicable Draft Local Plan policies:</td> <td colspan="3" data-bbox="1133 970 2054 1062">GSS01, GSS04, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, TOW04, CHW02, TRC01, TRC03</td> </tr> <tr> <td data-bbox="853 1062 1263 1129">Proposed uses/ allocation (as a proportion of floorspace):</td> <td colspan="3" data-bbox="1263 1062 2054 1129">70% of floorspace residential with 30% as leisure uses</td> </tr> <tr> <td data-bbox="853 1129 1263 1193">Indicative residential capacity:</td> <td colspan="3" data-bbox="1263 1129 2054 1193">132</td> </tr> <tr> <td data-bbox="853 1193 1133 1254">Justification:</td> <td colspan="3" data-bbox="1133 1193 2054 1254">The location is highly accessible and has potential for significant intensification.</td> </tr> </table>	Site description:	The bingo hall occupies a prominent corner location on Cricklewood Broadway. The site is adjacent to the northern boundary of Cricklewood Town Centre. Cricklewood Broadway is characterised by a diverse range of buildings, including late 19th century frontages of 2-4-storeys with retail and residential uses. The site is close to Cricklewood Station.			Applicable Draft Local Plan policies:	GSS01, GSS04, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, TOW04, CHW02, TRC01, TRC03			Proposed uses/ allocation (as a proportion of floorspace):	70% of floorspace residential with 30% as leisure uses			Indicative residential capacity:	132			Justification:	The location is highly accessible and has potential for significant intensification.						
Site description:	The bingo hall occupies a prominent corner location on Cricklewood Broadway. The site is adjacent to the northern boundary of Cricklewood Town Centre. Cricklewood Broadway is characterised by a diverse range of buildings, including late 19th century frontages of 2-4-storeys with retail and residential uses. The site is close to Cricklewood Station.																								
Applicable Draft Local Plan policies:	GSS01, GSS04, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, TOW04, CHW02, TRC01, TRC03																								
Proposed uses/ allocation (as a proportion of floorspace):	70% of floorspace residential with 30% as leisure uses																								
Indicative residential capacity:	132																								
Justification:	The location is highly accessible and has potential for significant intensification.																								

Site requirements and development guidelines:	<p>Proposals must support the continuing use of the site as a leisure venue on the vibrant and accessible Cricklewood Broadway. The design should include an active frontage onto Cricklewood Broadway.</p> <p>While tall buildings may be permitted in the Cricklewood Growth Area means, the design must be mindful of the local context.</p> <p>The scale of development is likely to require upgrades of the water supply network infrastructure. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing phasing plan to ensure development does not outpace delivery of essential network upgrades.</p> <p>The site should be subject to an archaeological assessment.</p> <p>The Council will prepare an area planning framework for the Cricklewood Growth Area.</p>
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Site No. 8	Broadway Retail Park (Cricklewood Growth Area)		
Site Address:	Cricklewood Lane, Cricklewood, NW2 1ES		
	Ward:	Childs Hill	
	PTAL 2019:	5	
	PTAL 2031:	5	
	Site Size:	2.77 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Central	
	Existing or most recent site use/s:	Retail and associated car parking	
	Development timeframe:	0-5 years	
	Planning designations:	None	
Relevant planning applications:	20/3564/OUT (refused) 1,100 residential units and mixed uses.		
			


	<p>Site description:</p> <p>Low-density retail units with extensive car parking, adjacent to Cricklewood Town Centre. The Midland Mainline railway runs along the eastern boundary. Opposite are 2-3 storey early 20th Century buildings in retail and residential use.</p> <p>The Cricklewood Railway Terraces conservation area lies to the north west of the site while the Mapesbury Conservation Area lies to the south in neighbouring Brent.</p> <p>Cricklewood Station is adjacent, and the site is highly accessible by public transport.</p>
	<p>Applicable Draft Local Plan policies:</p> <p>GSS01, GSS04, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, CHW01, CHW02, EGY03, TOW02, TRC01, TRC02, TRC03</p>
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p> <p>90% of floorspace as residential with 10% commercial and community.</p>
	<p>Indicative residential capacity:</p> <p>1,007</p>
	<p>Justification:</p> <p>The low density buildings and surface car parking are in a high PTAL location, adjacent to town centre shops and services.</p>
<p>Site requirements and development guidelines:</p> <p>The site is suitable for a residential-led scheme along with retail and community uses.</p> <p>Good public transport access, proximity to town centre facilities and the potential for tall buildings mean that significant intensification of the site is possible.</p> <p>Proposal design must also take into careful consideration the sensitive adjacent conservation areas in Barnet and Brent, and low-rise buildings to the south east.</p> <p>The site should be subject to an archaeological assessment.</p> <p>The water supply and wastewater network capacity in this area may be unable to support the demand anticipated from this development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required. The detailed drainage strategy should be submitted with the planning application.</p> <p>The Council will prepare an area planning framework for the Cricklewood Growth Area.</p>	

Site No. 9	Colindeep Lane (adjacent to Northern Line) (Colindale Growth Area)		
Site Address:	Colindeep Lane, Colindale, NW9 6RY		
	Ward:	Colindale	
	PTAL 2019:	1A	
	PTAL 2031:	2	
	Site Size:	0.81 ha	
	Ownership:	Public (TfL)	




	Site source:		Call for sites		
	Context type:		Urban		
	Existing or most recent site use/s:		Vacant; surplus railway corridor land.		
	Development timeframe:		6-10 years		
	Planning designations:		Site of Borough Importance for Nature Conservation; Green Chain		
	Relevant planning applications:		None		
	Site description:		The site is thickly wooded and lies adjacent to the embankment for the Northern Line. Due to the proximity of the Silk Stream a significant portion of the site is Flood Zone 2, with some of the site in Zone 3. Difficult access also makes the site vulnerable to flood risk.. A Site of Borough Importance for Nature Conservation covers part of the site, which is also crossed by a green chain route along the Silk Stream. The backlands location and watercourse make site access to difficult.		
	Applicable Draft Local Plan policies:		GSS01, GSS06, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CHW02, ECC02, ECC02A, ECC06, TRC01, TRC04		
	Proposed uses/ allocation (as a proportion of floorspace):		100% residential		
	Indicative residential capacity:		128		
	Justification:		The site is not in use and lies within a residential area, offering potential for intensification. The portion of the site in Flood Zone 3b (functional flood plain) should not be built on.		

Site requirements and development guidelines:	<p>Necessary flood risk prevention and mitigation measures must be made to enable development, with reference to the SFRA Level 2. Naturalised SuDS should be integrated within the proposals.</p> <p>Design proposals must ensure protection of the mature trees and Green Chain and adjoining SINC. Proposals should seek to retain the areas of greenery along the Silk Stream to improve biodiversity, along with the potential for creating publicly accessible nature areas. Opportunities for public access along the Silk Stream should be fully explored, with potential for a direct through-route between Colindale Park and Rushgrove Park as part of the Barnet Loop with reference to Barnet’s Long Term Transport Strategy (LTTTS).</p> <p>The site should be subject to an archaeological assessment.</p> <p>The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.</p> <p>Designs must consider the privacy and amenity of neighbouring residential properties and mitigate the noise from the adjacent Northern Line that runs through the night on Friday and Saturday.</p> <p>Proposals must demonstrate how sufficient access to public highway will be secured.</p>
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Site No. 10	Douglas Bader Park Estate (Estate Regeneration and Infill)		
Site Address:	Clayton Field, Colindale, NW9 5SE		
	Ward:	Colindale	
	PTAL 2019:	1B	
	PTAL 2031:	1B	
	Site Size:	4.12 ha	
	Ownership:	RSL	
	Site source:	Regeneration Report	
	Context type:	Urban	
	Existing or most recent site use/s:	residential	
	Development timeframe:	6-10 years	
	Planning designations:	None	
	Relevant planning applications:	None	


	Site description:	This is a low-rise 1970s-era estate comprising 200 dwellings. The surrounding area is mainly residential. Public transport access is poor.	
	Applicable Draft Local Plan policies:	GSS01, GSS10, HOU01, HOU02, HOU05, CDH01, CDH02, CDH03, CDH04, CDH07, CHW01, CHW02, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	Mostly residential with a small quantum of community facilities and commercial uses.	
	Indicative residential capacity:	478 (net increase)	
	Justification:	The estate has been identified for renewal to update the existing stock, which is in poor condition, while intensifying and making better use of the site through a net increase in housing.	
Site requirements and development guidelines:	<p>Due to high costs and substandard dwellings sizes the owner (Home Group) is seeking extensive redevelopment. In 2016 a full assessment was carried out of the estate by the owner; the majority of the properties (99.3%) on the estate fail to meet London Plan Space Standards. Additionally, the homes were built in the 1970s and will need significant investment to maintain both now and in the near future. Many of the homes are no longer fit for purpose and do not meet the housing need of Home Group customers. Home Group, in a Joint Venture with Hill, has undertaken pre-application advice discussions with both LBB and the GLA in relation to the future regeneration of the site. A successful residents' ballot was held in May 2019 where 90.5% of eligible residents participated and 75.4% voted in favour of the regeneration.</p> <p>Proposals must protect the amenity of existing households while providing sufficient amenity for the new homes.</p> <p>The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.</p> <p>Due to the low PTAL, proposals should support transport accessibility improvements.</p>		

Site No. 11	KFC/ Burger King Restaurant		
Site Address:	Edgware Road, NW9 5EB		
	Ward:	Colindale	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.44 ha	
	Ownership:	private	



	<table border="1"> <tr> <td>Site source:</td> <td>Colindale Area Action Plan</td> </tr> <tr> <td>Context type:</td> <td>Central</td> </tr> <tr> <td>Existing or most recent site use/s:</td> <td>Fast food restaurant and take-away with associated parking</td> </tr> <tr> <td>Development timeframe:</td> <td>0-5 years</td> </tr> <tr> <td>Planning designations:</td> <td>None</td> </tr> <tr> <td>Relevant planning applications:</td> <td>None</td> </tr> </table>	Site source:	Colindale Area Action Plan	Context type:	Central	Existing or most recent site use/s:	Fast food restaurant and take-away with associated parking	Development timeframe:	0-5 years	Planning designations:	None	Relevant planning applications:	None	
Site source:	Colindale Area Action Plan													
Context type:	Central													
Existing or most recent site use/s:	Fast food restaurant and take-away with associated parking													
Development timeframe:	0-5 years													
Planning designations:	None													
Relevant planning applications:	None													
	<table border="1"> <tr> <td>Site description:</td> <td> <p>The site consists of a fast food restaurant and take away on a low-density site, with the single-storey building surrounded by surface car parking.</p> <p>The site lies on the busy arterial A5/ Edgware Road, along which a significant amount of development and intensification is being undertaken. Surrounding the site along this section of the A5/ Edgware Road are large scale business premises.</p> <p>The Watling Estate Conservation Area is to the north of the site, while within Brent the Roe Green Village Conservation Area lies to the east, and the Buck Lane Conservation Area is to the south.</p> <p>To the rear is low rise residential housing. Colindale Station is within less than 1km and the A5/ Edgware Road has a high level of bus services.</p> </td> </tr> </table>		Site description:	<p>The site consists of a fast food restaurant and take away on a low-density site, with the single-storey building surrounded by surface car parking.</p> <p>The site lies on the busy arterial A5/ Edgware Road, along which a significant amount of development and intensification is being undertaken. Surrounding the site along this section of the A5/ Edgware Road are large scale business premises.</p> <p>The Watling Estate Conservation Area is to the north of the site, while within Brent the Roe Green Village Conservation Area lies to the east, and the Buck Lane Conservation Area is to the south.</p> <p>To the rear is low rise residential housing. Colindale Station is within less than 1km and the A5/ Edgware Road has a high level of bus services.</p>										
Site description:	<p>The site consists of a fast food restaurant and take away on a low-density site, with the single-storey building surrounded by surface car parking.</p> <p>The site lies on the busy arterial A5/ Edgware Road, along which a significant amount of development and intensification is being undertaken. Surrounding the site along this section of the A5/ Edgware Road are large scale business premises.</p> <p>The Watling Estate Conservation Area is to the north of the site, while within Brent the Roe Green Village Conservation Area lies to the east, and the Buck Lane Conservation Area is to the south.</p> <p>To the rear is low rise residential housing. Colindale Station is within less than 1km and the A5/ Edgware Road has a high level of bus services.</p>													
<table border="1"> <tr> <td>Applicable Draft Local Plan policies:</td> <td>GSS01, GSS06, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, ECY03, ECC02, CHW02, TOW03, TRC01, TRC03</td> </tr> </table>		Applicable Draft Local Plan policies:	GSS01, GSS06, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, ECY03, ECC02, CHW02, TOW03, TRC01, TRC03	<table border="1"> <tr> <td>Proposed uses/ allocation (as a proportion of floorspace):</td> <td>90% residential floorspace with 10% floorspace restaurant</td> </tr> </table>	Proposed uses/ allocation (as a proportion of floorspace):	90% residential floorspace with 10% floorspace restaurant								
Applicable Draft Local Plan policies:	GSS01, GSS06, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, ECY03, ECC02, CHW02, TOW03, TRC01, TRC03													
Proposed uses/ allocation (as a proportion of floorspace):	90% residential floorspace with 10% floorspace restaurant													
<table border="1"> <tr> <td>Indicative residential capacity:</td> <td>162</td> </tr> </table>		Indicative residential capacity:	162											
Indicative residential capacity:	162													
<table border="1"> <tr> <td>Justification:</td> <td>The site is in low density use and can be intensified to provide residential uses in the accessible location.</td> </tr> </table>		Justification:	The site is in low density use and can be intensified to provide residential uses in the accessible location.											
Justification:	The site is in low density use and can be intensified to provide residential uses in the accessible location.													

Site requirements and development guidelines:	The site lies within the Colindale Growth Area and may be suitable for tall buildings, although any proposal must take account of the low-rise nature of residential areas to the rear. Furthermore, the potential impact of any tall buildings on the setting of the Watling Estate, Roe Green Village Conservation Area and Buck Lane conservation areas must be considered. Careful design and massing could minimise or mitigate impacts. The Character Appraisals for these conservation areas should form part of the evidence base. The site should be subject to an archaeological assessment. As the site lies on an important movement corridor, development should positively address the Edgware Road and provide an active ground floor frontage along its length. Residential uses must ensure the future occupants are protected from air and noise pollution arising from the busy A5/ Edgware Road. Compliance is required with Council’s Healthier Catering Commitment. The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.
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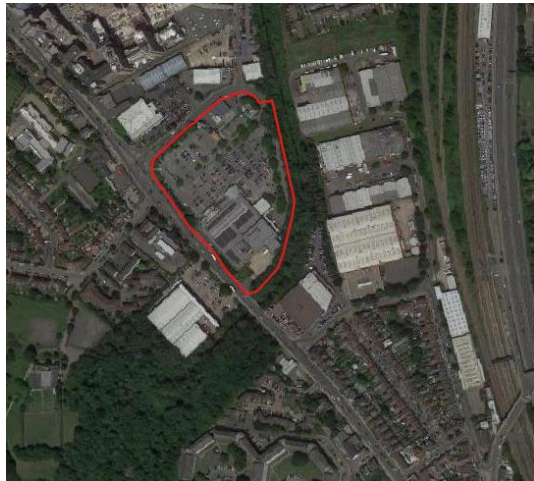
Site No. 12	McDonald’s Restaurant		
Site Address:	157 Colindeep Lane, NW9 6BD		
	Ward:	Colindale	
	PTAL 2019:	3	
	PTAL 2031:	3	
	Site Size:	0.48 ha	
	Ownership:	Private	
	Site source:	Colindale Area Action Plan	
	Context type:	Central	
	Existing or most recent site use/s:	Fast food restaurant and take-away with associated parking	
	Development timeframe:	0-5 years	
	Planning designations:	None	
Relevant planning applications:	None		
			



	<p>Site description:</p> <p>The site consists of a fast food restaurant and take away on a low-density site, with the single-storey building surrounded by surface car parking.</p> <p>The corner site lies on the busy arterial A5 Edgware Road, along which a significant amount of development and intensification is being undertaken. On the opposite side of the Colindeep Lane junction a tall building has recently been completed. The LB Brent side of the A5/ Edgware Road consists of large-scale business premises.</p> <p>The Watling Estate Conservation Area is to the north of the site, while within Brent the Roe Green Village Conservation Area lies to the east, and the Buck Lane Conservation Area is to the south. To the east and south is low rise residential housing. Colindale Station is within 1km and the A5 Edgware Road has a high level of bus services.</p>
	<p>Applicable Draft Local Plan policies:</p> <p>GSS01, GSS06, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CHW02, ECY03, ECC02, TOW03, TRC01, TRC03</p>
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p> <p>90% residential floorspace with 10% floorspace restaurant</p>
	<p>Indicative residential capacity:</p> <p>175</p>
	<p>Justification:</p> <p>The site is in low density use and can be intensified to provide residential uses in the accessible location.</p>
<p>Site requirements and development guidelines:</p> <p>The site lies within the Colindale Growth Area and may be suitable for tall building, although any proposal must take account of the low-rise nature of residential areas to the east and south. Furthermore, the potential impact of any tall buildings on the setting of the Watling Estate, Roe Green Village Conservation Area and Buck Lane conservation areas must be considered. Careful design and massing could minimise or mitigate impacts. The Character Appraisals for these conservations areas should form part of the evidence bases. The site should be subject to an archaeological assessment. As the site lies on an important movement corridor, development should positively address the Edgware Road and provide an active ground floor frontage along its length. Residential uses must ensure the future occupants are protected from air and noise pollution arising from the busy A5 Edgware Road. Compliance required with Council’s Healthier Catering Commitment. The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.</p>	

Site No. 13	Public Health England		
Site Address:	61 Colindale Avenue, NW9 5EQ/HT		
	Ward:	Colindale	
	PTAL 2019:	3	
	PTAL 2031:	3	
	Site Size:	4.77 ha	



	Ownership:	Department of Health & Social Care (Public Health England)	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Research laboratories	
	Development timeframe:	6-10 years	
	Planning designations:	Colindale Growth Area; Site of Borough Importance for Nature Conservation	
	Relevant planning applications:	None	
Site description:	<p>The Public Health England research laboratories will be moving to a new facility in Harlow which is expected to be operational by 2025.</p> <p>The site lies within the Colindale Growth Area and is adjacent to the recently redeveloped former Colindale Hospital site. Colindale tube station is within 300m.</p> <p>A Site of Borough Importance for Nature Conservation runs along the Silk Stream edge of the site. Parts of the site close to the Silk Stream are within Flood Zones 2 and 3.</p>		
Applicable Draft Local Plan policies:	GSS01, GSS04, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CHW01, CHW02, ECY01, ECY02, ECY03, ECC02, ECC02A, ECC06, TRC01, TRC02, TRC03		
Proposed uses/ allocation (as a proportion of floorspace):	95% residential floorspace with 5% community floorspace		
Indicative residential capacity:	794		
Justification:	The planned move of the Public Health England facilities provides an opportunity for intensification of this site within the Colindale Growth Area. Proposals should avoid the parts of the site that is Flood Zone 3b (functional flood plain).		


Site requirements and development guidelines:	<p>The site is within a tall building area and has good access to public transport, potentially supporting a higher density of development. Community uses should be provided on site to support the significant number of new residents. The site is part of the wider Colindale redevelopment area and proposals must demonstrate that the physical and social infrastructure can sustainably support the site, and contributions may be required to make development acceptable.</p> <p>Proposals should avoid those parts of the site that are Flood Zone 3b (functional flood plain). Necessary flood risk prevention and mitigation measures must be made to enable development, with reference to the SFRA Level 2.</p> <p>The site should be subject to an archaeological assessment.</p> <p>Mature trees on the site should be protected and proposals must demonstrate how they will be integrated into the landscape.</p> <p>The Silk Stream Corridor provides an opportunity to be opened-up for public access, extending an attractive green route into Montrose Park and connecting with Colindale Avenue. Connectivity for the Barnet Loop should be explored, with reference to Barnet’s Long Term Transport Strategy (LTTS).</p> <p>The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.</p>
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Site No. 14	Sainsburys The Hyde (Major Thoroughfare)		
Site Address:	Edgware Rd, The Hyde, NW9 6JX		
	Ward:	Colindale	
	PTAL 2019:	2	
	PTAL 2031:	3	
	Site Size:	3.18 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Supermarket with associated car parking and petrol station	
	Development timeframe:	1-5 years	
	Planning designations:	Site of Borough Importance for Nature Conservation; Green Chain	
			

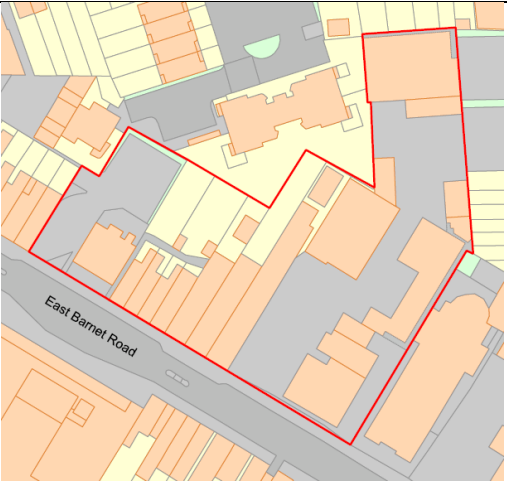


	<p>Relevant planning applications:</p>	<p>19/4661/FUL (approved) 1,309 residential units and commercial uses.</p>	
	<p>Site description:</p>	<p>A single-storey out-of-centre supermarket with associated surface car parking and a petrol filling station. The western boundary of the site lies on the busy A5 Edgware Road. To the east is the Silk Stream watercourse, along which is a Site of Borough Importance for Nature Conservation and Green Chain. The site is located within 1 kilometre of the Welsh Harp (Brent Reservoir) SSSI. The majority of the site is within Flood Zone 2 and parts of the south within Flood Zone 3a along the Silk Stream River Corridor. Surrounding uses are typically large-scale businesses. Hendon station is within ½ km.</p>	
<p>Applicable Draft Local Plan policies:</p>		<p>GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, CHW01, CHW02, ECY03, ECC02, ECC02A, ECC06, TRC01, TRC02 TRC03</p>	
<p>Proposed uses/ allocation (as a proportion of floorspace):</p>		<p>Mixed use development comprising a replacement Sainsburys store of 8,998 sqm GIA (Use Class A1), 1,309 residential units (Use Class C3) and 951 sqm GIA flexible commercial space.</p>	
<p>Indicative residential capacity:</p>		<p>1,309</p>	
<p>Justification:</p>		<p>The site has received planning permission (19/4661/FUL)</p>	

Site requirements and development guidelines:	The Council has resolved to grant planning permission for this site (planning ref: 19/4661/FUL). The assessment provided in support of the application concluded that for fluvial risk for up to the 1 in 100-year flood event the existing flood defences would be sufficient, according to flood modelling completed by the Environment Agency. The assessment of existing surface water flood risk at the site is generally very low, although with some areas of higher risk – this will be managed through a surface water drainage strategy incorporating SuDS. A SFRA Level 2 has been carried out for the site. Given the location adjacent to the SSSI, the development should ensure there is no inappropriate access from the developments onto sections of the SSSI that are not formal paths/ recreation areas. The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.
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Site No. 15	Tesco Coppetts Centre (Major Thoroughfares)		
Site Address:	Colney Hatch Lane, Friern Barnet, N11 0SH		
	Ward:	Coppetts	
	PTAL 2019:	2	
	PTAL 2031:	2	
	Site Size:	3.12 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Retail	
	Development timeframe:	6-10 years	
	Planning designations:	None	
Relevant planning applications:	None		
			
	Site description:	<p>A large single storey supermarket with extensive associated car parking and a petrol filling station. The site is part of a larger out-of-town retail park with other business units to the west and north east. The site is accessed from the east from Colney Hatch Lane, with the A406 North Circular Road and slip road to the south. Adjacent to the north of the site is Coppetts Wood which is Metropolitan Open Land, a Local Nature Reserve, and a Site of Borough Importance for Nature. A small section along the southern boundary to west of the site adjacent to Pinkham Way, is at flood risk. In addition, the Bounds Green Brook runs underneath the site close the Pinkham Way in culvert and is designated main river.</p>	


	Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, CHW01, CHW02, ECY03, ECC02, ECC02A, TRC01, TRC02, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	75% floorspace residential with 25% commercial and community uses and car parking.	
	Indicative residential capacity:	397	
	Justification:	The site is in low density use and can be intensified to provide residential uses while maintaining the supermarket use.	
Site requirements and development guidelines:	<p>No increase in retail floorspace would be expected as part of any redevelopment. An assessment must be undertaken of car parking requirements for retained retail; replacement spaces may be required. A residential redevelopment of this scale would justify the provision of a small community facility. Relatively poor access to public transport and local services will affect the level of density achievable at this site.</p> <p>The design must also ensure mitigation of noise and pollution from the North Circular Road and slip roads. Continuing business uses of other parts of the retail park may affect the residential potential, and ideally any proposal would be part of a wider redevelopment masterplan for the entire retail park. Proposals must ensure they avoid harm to the adjacent Coppetts Wood Local Nature Reserve.</p> <p>Proposals for the site should consider de-culverting of the Bounds Green Brook and inclusion of an appropriate buffer zone either side of the main river. Under no circumstances should buildings be allowed on top of the culvert, and access should be maintained along the entire length. Further information on flood risk and mitigation is provided by the SFRA Level 2.</p>		

Site No. 16	45-69 East Barnet Rd (New Barnet town centre)		
Site Address:	45-69 East Barnet Rd, New Barnet, EN4 8RN		
	Ward:	East Barnet	
	PTAL 2019:	3	
	PTAL 2031:	4	
	Site Size:	0.60 ha	
	Ownership:	Mixed	
	Site source:	New Barnet Town Centre Framework 2010	
	Context type:	Urban	




	<p>Existing or most recent site use/s:</p>	<p>Retail, public house, light industry, petrol service station and residential</p>		
<p>Development timeframe:</p>		<p>6-10 years</p>		
<p>Planning designations:</p>		<p>Town Centre</p>		
<p>Relevant planning applications:</p>		<p>None</p>		
	<p>Site description:</p>	<p>Located within New Barnet Town Centre, this site has a Primary Frontage which includes a public house, petrol station and a number of small retail outlets with flats/offices above. The rear of the site is small-scale industrial units with areas of hardstanding and car parking. Surrounding buildings are mostly 1-2 storeys in retail use, with a church adjacent to the southern site boundary. To the rear of the site has already been redeveloped with 3-storey residential block. The site is close to New Barnet Station.</p>		
<p>Applicable Draft Local Plan policies:</p>		<p>GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, TOW03, TOW04, CHW02, CHW04, ECY01, ECY02, ECY03, TRC01, TRC03</p>		
<p>Proposed uses/ allocation (as a proportion of floorspace):</p>		<p>70% residential floorspace with 30% commercial uses</p>		
<p>Indicative residential capacity:</p>		<p>110</p>		
<p>Justification:</p>		<p>The site is in low density use and can be intensified to provide residential development of an appropriate scale and massing while maintaining the town centre uses.</p>		
<p>Site requirements and development guidelines:</p>	<p>Maintain retail uses in the Primary Frontage along East Barnet Road. The high street character should be enhanced, potentially through refurbishing some of the existing buildings – the public house is identified as a character building by the Town Centre Framework. Residential uses can be focused at the rear of the site. Designs must be appropriate to the context of the high street and surrounding area. Further planning guidance is provided by the New Barnet Town Centre Framework (2010) which identifies the site as within Area 2.</p>			

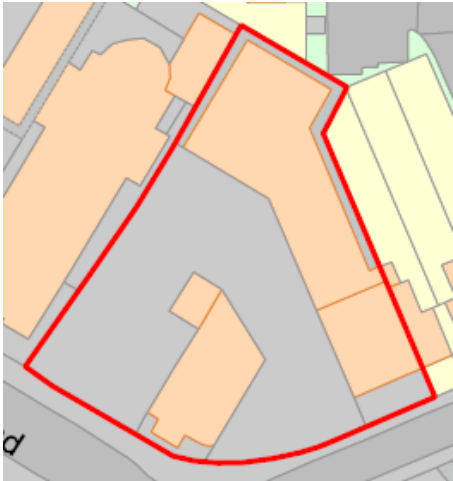


Site No.17	This site has been removed due to it being unlikely to come forward for redevelopment during the Local Plan period. The site number is being retained to provide consistency of site numbering between the Plan versions.
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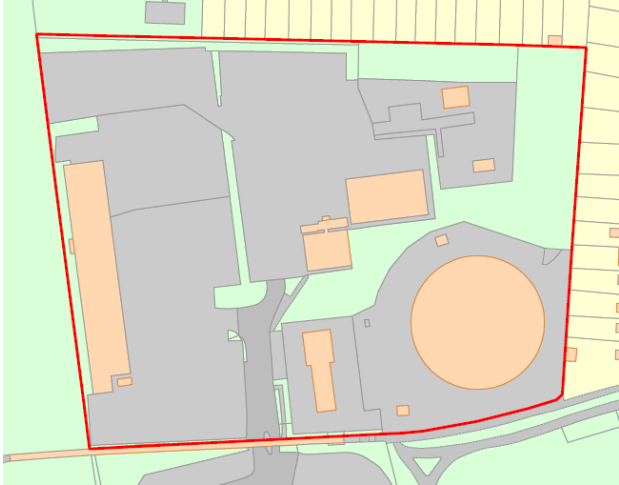

Site No. 18	Former East Barnet library	
Site Address:	85 Brookhill Rd, New Barnet EN4 8SG	
	Ward:	East Barnet
	PTAL 2019:	2
	PTAL 2031:	2
	Site Size:	0.16 ha
	Ownership:	Council
	Site source:	Council assets disposal programme
	Context type:	Urban
	Existing or most recent site use/s:	Public library and associated car park
	Development timeframe:	0-5 years
	Relevant planning applications:	20/4546/FUL (approved) temporary change of use to storage/ distribution
Site description:	<p>The site has previously operated as a public library, but the facility has been relocated to share the new leisure centre building at Victoria Park.</p> <p>The location is on a relatively busy crossroads and is within 220m of the East Barnet Village local centre. Opposite across the road are 3-storey blocks of flats with some business uses on the ground floor. Low-rise residential units lie adjacent to the north and west of the site.</p>	
	Applicable Draft Local Plan policies:	GSS01, HOU01, HOU02, CDH01, CDH02, CDH03, CHW01, CHW02, TRC01, TRC03
		

	Proposed uses/ allocation (as a proportion of floorspace):	50% residential floorspace with 50% community uses floorspace.
	Indicative residential capacity:	12
	Justification:	The public library has relocated so the building is no longer required for this use. The site is located within a residential area and is close to East Barnet local town centre facilities and bus routes.
Site requirements and development guidelines:	<p>The site must be assessed for the potential need to retain a community use.</p> <p>The site contains mature trees which should be retained. Combined with a significant slope across the site and the adjacent low-rise residential units, the design must be mindful of these restrictions and may require differing heights.</p> <p>The site should be subject to an archaeological assessment.</p> <p>East Barnet Village provides a range of local amenities and the site is connected to the wider area through several bus routes.</p>	



Site No. 19	East Barnet Shooting Club (New Barnet Town Centre)		
Site Address:	Victoria Rd New Barnet EN4 9SH		
	Ward:	East Barnet	
	PTAL 2019:	3	
	PTAL 2031:	3	
	Site Size:	0.25 ha	
	Ownership:	Council	
	Site source:	Council assets disposal programme	
	Context type:	Urban	


	<p>Existing or most recent site use/s:</p>	<p>Shooting range</p>		
<p>Development timeframe:</p>		<p>11-15 years</p>		
<p>Planning designations:</p>		<p>None</p>		
<p>Relevant planning applications:</p>		<p>None</p>		
	<p>Site description:</p>	<p>A small building in use as a shooting range. The site is adjacent to New Barnet Town Centre and to the main entrance to Victoria Recreation Ground from New Barnet town centre. Surrounding sites to the north and west are being redeveloped as part of the regeneration of the Victoria Quarter. The site is within 400m of New Barnet Station.</p>		
<p>Applicable Draft Local Plan policies:</p>		<p>GSS01, GSS08, HOU01, HOU04, CDH01, CDH02, CHW01, TOW01, CHW01, CHW02, TRC01, TRC03</p>		
<p>Proposed uses/ allocation (as a proportion of floorspace):</p>		<p>Residential</p>		
<p>Indicative residential capacity:</p>		<p>43</p>		
<p>Justification:</p>		<p>The site is highlighted in the New Barnet Town Centre Framework (2010) and has good access to public transport and town centre facilities.</p>		
<p>Site requirements and development guidelines:</p>	<p>Highlighted in the New Barnet Town Centre Framework (2010) as part of Opportunity Site 1, the Victoria Quarter. Build-out of several parts of the Victoria Quarter are underway. As a community facility there should be an assessment as to the need to replace the functionality and floorspace of the existing facility. For further information refer to the New Barnet Town Centre Framework.</p>			

Site No. 20	Fayer's Building Yard & Church (New Barnet Town Centre)			
Site Address:	63-77 East Barnet Rd & 15-17 Margaret Rd, New Barnet, EN4 9NR			
	Ward:	East Barnet		
	PTAL 2019:	3		
	PTAL 2031:	3		
	Site Size:	0.21 ha		
	Ownership:	Private		
	Site source:	Call for sites; New Barnet Town Centre Framework		
	Context type:	Urban		
	Existing or most recent site use/s:	Retail and place of worship		
	Development timeframe:	6-10 years		
	Planning designations:	Town Centre		
Relevant planning applications:	None			
	Site description:	The site consists of a building supplies yard and a church, situated on a corner location within New Barnet Town Centre. Surrounding buildings are largely low-rise in retail and residential use. New Barnet Station is within approximately 300m.		
		Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, TOW03, CHW01, CHW02, ECY01, ECY03, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	70% residential use with 30% re-provided community use.		
	Indicative residential capacity:	25		
	Justification:	The site is highlighted in the New Barnet Town Centre Framework (2010) and has good access to public transport and town centre facilities.		
		Site requirements and development guidelines: A residential-led scheme, with retention or re-provision of the church. The design must be appropriate to the surrounding context. For further guidance refer to Opportunity Site 5 of the New Barnet Town Centre Framework (2010).		




Site No. 21	New Barnet gasholder (New Barnet Town Centre)		
Site Address:	Albert Rd, New Barnet, EN4 9SH		
	Ward:	East Barnet	
	PTAL 2019:	1A	
	PTAL 2031:	1A	
	Site Size:	2.23 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Gasworks (demolished); gasholder	
	Development timeframe:	6-10 years	
	Planning designations:	None	
	Relevant planning applications:	None	
		Site description:	The site is a former gasholder and gasworks site. The remainder of the gasworks site, running south along the railway towards New Barnet town centre, was demolished several years ago and is being redeveloped (B/04834/14 - residential-led, mixed-use development 305 residential units). To the north and east of the site is a 1930s housing estate, Victoria Recreation Ground and the new leisure centre. To the west is the East Coast Mainline railway. New Barnet Station is within 1km.
Applicable Draft Local Plan policies:		GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CHW01, CHW02, ECC02, TRC01, TRC03	
Proposed uses/ allocation (as a proportion of floorspace):		95% residential floorspace with 5% community floorspace	
Indicative residential capacity:		201	

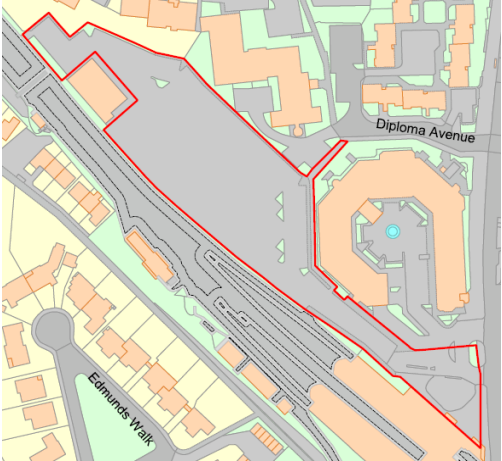
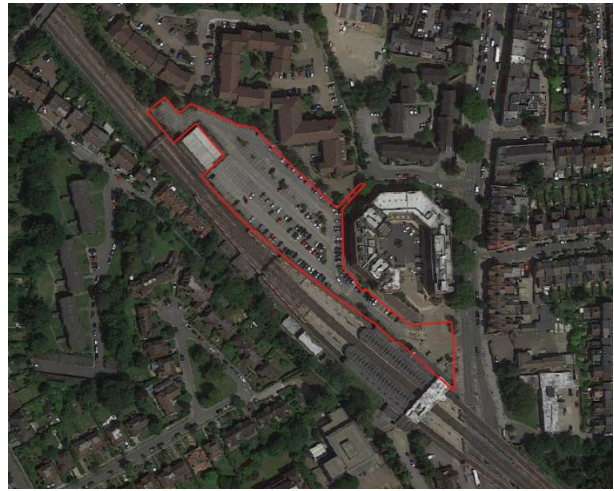

	Justification:	The site is highlighted within the New Barnet Town Centre Framework (2010) and presents a redundant industrial use within a residential area that is within walking distance of East Barnet Town Centre with its shopping, services and public transport connections.
Site requirements and development guidelines:	<p>The site is highlighted within the New Barnet Town Centre Framework (2010), being part of Opportunity Site 1. Build-out of several parts of Site 1 are already well underway. Due to the nature of the existing use land decontamination will be an important consideration. The scale of the site means that it may be appropriate to provide a community use to address the needs of new residents.</p> <p>Proposals must take into consideration the existing suburban housing to the north and east of the site and ensure there is no loss of amenity in terms of overlooking.</p>	

Site No. 22	Sainsburys (New Barnet Town Centre)		
Site Address:	66 East Barnet Rd, New Barnet, EN4 8RQ		
	Ward:	East Barnet	
	PTAL 2019:	3	
	PTAL 2031:	4	
	Site Size:	1.02 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Supermarket with associated car parking	
	Development timeframe:	6-10 years	
	Planning designations:	Town Centre	
Relevant planning applications:	None		
			
	Site description:	A largely one storey building within New Barnet Town Centre, containing a supermarket with offices in an additional 2-storey tower above. There is surface car parking to the rear and a roof car park over the supermarket. East Barnet Road is a relatively narrow thoroughfare and the surrounding buildings are mostly 1-2 storeys and in retail B-uses. The rear of the site faces the mainline railway and 3-4 storey residential block. New Barnet station is next to the site.	



	Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, TOW03, TOW04, CHW02, EGY03, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	75% residential floorspace with 25% commercial and car parking	
	Indicative residential capacity:	199	
	Justification:	The site can be intensified and provides a town centre location that is accessible by bus and rail links.	
Site requirements and development guidelines:	Maintain an active frontage with town centre uses along East Barnet Road. The design should reflect the surrounding context. Seek to incorporate a new/ improved pedestrian route connecting East Barnet Road to the railway station. For further guidance refer to the New Barnet Town Centre Framework. The existing retail use should be retained, with associated car parking requirements assessed and re-provided if supported by the evidence.		

Site No. 23	Bobath Centre (East Finchley Town Centre)		
Site Address:	250 East End Rd, East Finchley, N2 8AU		
	Ward:	East Finchley	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.39 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Child-care nursery.	
	Development timeframe:	0-5 years	


	<p>Planning designations:</p>	<p>Listed Building; Archaeological Priority Area</p>	
	<p>Relevant planning applications:</p>	<p>18/4547/FUL approved) extensions and creation of external playground.</p>	
	<p>Site description:</p>	<p>The site contains a Grade II listed building, while to the rear are non-listed elements of the building and car parking. The site adjoins East Finchley Centre. Surrounding buildings are mostly residential and consist of either 2-storey terraces or 3-storey housing blocks. Bus routes are close by and East Finchley Underground Station is within approximately half a kilometre.</p>	
	<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH07, CDH08, TOW01, CHW01, CHW02, TRC01, TRC03</p>	
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>25% Residential floorspace with 75% community floorspace.</p>	
	<p>Indicative residential capacity:</p>	<p>25</p>	
	<p>Justification:</p>	<p>The site is adjacent to the services of East Finchley Town Centre and close to tube and bus links. The area at the rear of the site provides an opportunity for intensification with a design that is respectful of the listed building.</p>	
<p>Site requirements and development guidelines:</p>	<p>The building is in use as a child-care nursery, providing the community use on the site. Residential development to the rear of the site must protect and enhance the setting of the listed building. While pedestrian access is good, including a pathway directly to the nearby station, proposals for residential use at the rear of the site must resolve the issue of restricted access for any car parking and service vehicles. The site should be subject to an archaeological assessment.</p>		


Site No. 24	East Finchley station car park (East Finchley Town Centre)			
Site Address:	High Rd East, Finchley, N2 0NW			
	Ward:	East Finchley		
	PTAL 2019:	5		
	PTAL 2031:	5		
	Site Size:	0.74 ha		
	Ownership:	Public (TfL)		
	Site source:	Call for sites		
	Context type:	Urban		
Existing or most recent site use/s:	Public car park			
Development timeframe:	6-10 years			
Planning designations:	Town Centre			
Relevant planning applications:	None			
	Site description:	Currently in use as the car park (269 spaces) for the adjacent Underground station. The site lies partly within, and partly adjoining, East Finchley Town Centre. Immediately adjoining the site is the Grade II listed East Finchley Station (including the platforms). Surrounding uses are a mix of office and residential in modern buildings of 3-4 storeys. The site is highly accessible by public transport.		
	Applicable Draft Local Plan policies:	GSS01, GSS08, GSS12, HOU01, HOU02, CDH01, CDH02, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, CHW01, CHW02, ECC02, TRC01, TRC03.		
	Proposed uses/ allocation (as a proportion of floorspace):	70% residential floorspace and 30% commercial uses (E Class), public realm including station drop-off and public car parking		
	Indicative residential capacity:	135		
	Justification:	In this highly accessible town centre location the car park is a low intensity use; the potential for higher density usage including residential would be in line with the national and London Plan policy approaches to enhance the town centre and public car parking.		
				

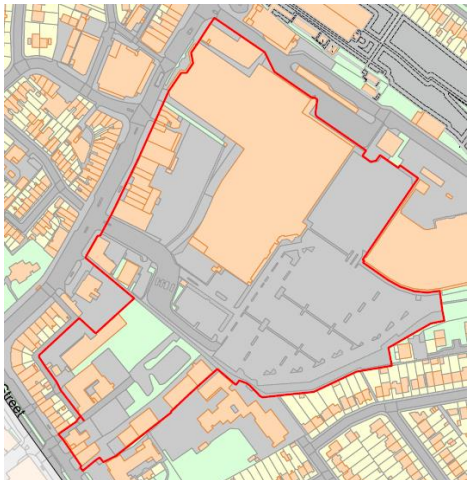

Site requirements and development guidelines:	Site layout will be important due to surrounding residential and transport uses, along with the Grade II listed station building. It might be advantageous to separate the needs of the station users from residents and visitors accessing the residential units. Access to the latter could be through Diploma Avenue, which would also provide a more direct route to the town centre, helping to integrate the new development into the surrounding area. Design proposals must demonstrate how they will sensitively take account of the neighbouring listed building, with high quality public realm required to the front of the building. Proposals must also show how they will mitigate noise for residents from the adjacent tube line, particularly since trains run through the night on Friday and Saturday. Public car parking requirements must be assessed and re-provided as needed, and access ensured for people with disabilities.
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Site No. 25	East Finchley substation (East Finchley Town Centre)		
Site Address:	High Rd, East Finchley, N2 0NL		
	Ward:	Garden Suburb	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.19 ha	
	Ownership:	Public (TfL)	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Vacant (former substation for Northern Line)	
	Development timeframe:	11-15 years	
	Planning designations:	None	
Relevant planning applications:	None		
	Site description:	The site lies close to the southern boundary of East Finchley Town centre and opposite the boundary of the Hampstead Garden Suburb conservation area; to the rear is the Underground line embankment, while to the south is a 3-storey office building. The existing building comprises a disused London Underground electricity substation. Public transport access is good.	
	Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH04, CDH07, CDH08, TOW01, TOW02, CHW02, ECC02, TRC01, TRC03	
			

	Proposed uses/ allocation (as a proportion of floorspace):	95% residential floorspace with 5% commercial (office).
	Indicative residential capacity:	29
	Justification:	The facility is no longer in use for infrastructure and this highly accessible location offers an opportunity for redevelopment for residential with a small amount of commercial space that does not have a negative impact on the nearby town centre.
Site requirements and development guidelines:	The design must take account of the adjoining conservation area and listed buildings and should provide a high quality addition at this entranceway to the East Finchley Town Centre. Good access to public transport and town centre facilities support an intensification of the site. There is potential for a small amount of office uses on the ground floor, which should present an active frontage. Noise from passing trains must be mitigated for the residential use, particularly since trains run through the night on Friday and Saturday.	

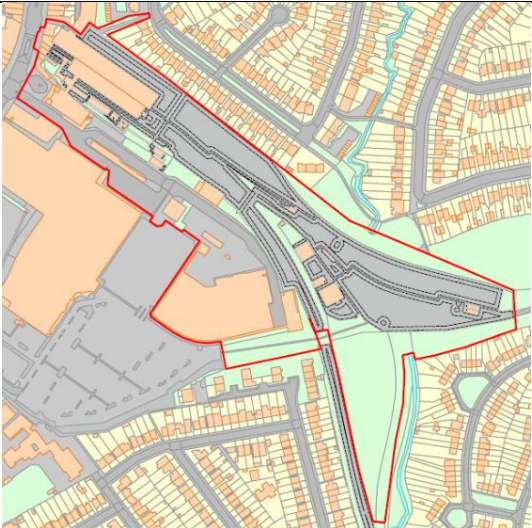

Site No. 26	Park House (East Finchley Town Centre)		
Site Address:	16 High Rd, East Finchley, N2 9PJ		
	Ward:	East Finchley	
	PTAL 2019:	4	
	PTAL 2031:	5	
	Site Size:	0.2 ha	
	Ownership:	Council	
	Site source:	2015 call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Community building	
	Development timeframe:	0-5 years	
	Planning designations:	Town Centre	
Relevant planning applications:	18/5822/FUL (approved) adjacent to the north for 24 flats and office space		
			

	<p>Site description:</p> <p>The site is within East Finchley Town Centre and consists of two storey buildings with outdoor amenity and parking spaces. The building is set back from the road and to the front is an area of green with mature trees. The building is in use as a childcare facility. The Grade II listed East Finchley station lies opposite. To the south is a railway embankment, along with Cherry Tree Wood which is Metropolitan Open Land and an area of Local Importance for Nature Conservation. To the north is a Victorian 3-storey terrace with retail uses, while to the rear of the site is low-rise housing.</p>
	<p>Applicable Draft Local Plan policies:</p> <p>GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, CHW01, CHW02, ECC02, TRC01, TRC03</p>
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p> <p>60% residential floorspace with 40% community uses</p>
	<p>Indicative residential capacity:</p> <p>20</p>
	<p>Justification:</p> <p>The town centre site is highly accessible and can be intensified to provide a mix of residential and community uses.</p>
<p>Site requirements and development guidelines:</p> <p>Design proposals must take a sensitive approach to building massing and height to ensure no loss of amenity for local residents. The site is prominent within East Finchley Town Centre and the design must be compatible with and contribute to the surrounding townscape, including the Grade II listed station. The area of green space with mature trees at the front should be maintained and improved, while the overall site design should attractively frame and signpost the entrance to the sensitive green area of Cherry Tree Wood to the south. Proposals should be mindful that the site to the north permission was granted in 2020 (18/5822/FUL) for demolition of existing buildings and construction of two 4-storey buildings providing 24 flats, along with office space.</p> <p>The community facility must be re-provided and proposals must show how the community will benefit from the redevelopment.</p> <p>The site should be subject to an archaeological assessment.</p> <p>The design must mitigate noise from the adjacent railway and road, particularly since trains run through the night on Friday and Saturday.</p>	

Site No. 27	Edgware Town Centre (Edgware Growth Area)																							
Site Address:	Station Rd, Edgware, HA8																							
	<table border="1"> <tr> <td>Ward:</td> <td>Edgware</td> </tr> <tr> <td>PTAL 2019:</td> <td>6A</td> </tr> <tr> <td>PTAL 2031:</td> <td>6A</td> </tr> <tr> <td>Site Size:</td> <td>7.83 ha</td> </tr> <tr> <td>Ownership:</td> <td>Private, Council and TfL</td> </tr> <tr> <td>Site source:</td> <td>Edgware Town Centre Framework (2013)</td> </tr> <tr> <td>Context type:</td> <td>Central</td> </tr> <tr> <td>Existing or most recent site use/s:</td> <td>Retail, office, residential and car parking.</td> </tr> <tr> <td>Development timeframe:</td> <td>6-10 years</td> </tr> <tr> <td>Planning designations:</td> <td>Town Centre; Archaeological Priority Area</td> </tr> <tr> <td>Relevant planning applications:</td> <td>16/0112/FUL (approved) at 120-124 Station Road for 122 flats and retail; 19/6697/FUL (approved) at 30 High Street offices and 14 residential units; 17/4335/FUL (approved) at 1-2 Church Way 9 flats; 19/6776/FUL (refused) land to rear of Railway Hotel to be used as a car park.</td> </tr> </table>	Ward:	Edgware	PTAL 2019:	6A	PTAL 2031:	6A	Site Size:	7.83 ha	Ownership:	Private, Council and TfL	Site source:	Edgware Town Centre Framework (2013)	Context type:	Central	Existing or most recent site use/s:	Retail, office, residential and car parking.	Development timeframe:	6-10 years	Planning designations:	Town Centre; Archaeological Priority Area	Relevant planning applications:	16/0112/FUL (approved) at 120-124 Station Road for 122 flats and retail; 19/6697/FUL (approved) at 30 High Street offices and 14 residential units; 17/4335/FUL (approved) at 1-2 Church Way 9 flats; 19/6776/FUL (refused) land to rear of Railway Hotel to be used as a car park.	
Ward:	Edgware																							
PTAL 2019:	6A																							
PTAL 2031:	6A																							
Site Size:	7.83 ha																							
Ownership:	Private, Council and TfL																							
Site source:	Edgware Town Centre Framework (2013)																							
Context type:	Central																							
Existing or most recent site use/s:	Retail, office, residential and car parking.																							
Development timeframe:	6-10 years																							
Planning designations:	Town Centre; Archaeological Priority Area																							
Relevant planning applications:	16/0112/FUL (approved) at 120-124 Station Road for 122 flats and retail; 19/6697/FUL (approved) at 30 High Street offices and 14 residential units; 17/4335/FUL (approved) at 1-2 Church Way 9 flats; 19/6776/FUL (refused) land to rear of Railway Hotel to be used as a car park.																							
	Site description:	<p>The site is within Edgware Town Centre and includes Primary Retail Frontages. It encompasses the Broadwalk Shopping Centre (with roof car parking), a supermarket and associated car parking. To the north and west the sites faces onto Station Road and A5 Edgware Road with retail frontages in mid-20th Century buildings. The site also includes some office and residential uses. To the south is a mosque and a primary school, along with low-rise housing. To the east are the bus and railway stations. The Grade II listed Railway Hotel – a local landmark building - is close to the north western part of the site. Public transport accessibility is high. Edgware is identified as a strategic location for where tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre.</p>																						



	Applicable Draft Local Plan policies:	GSS01, GSS05, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECV01, ECV02, ECV03, ECC02, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	75% residential floorspace with 25% mixed uses of town centre commercial (retail and office), entertainment, community, and car parking	
	Indicative residential capacity:	2,379	
	Justification:	The site is highly accessible by public transport and includes large areas of brownfield land, surface car parking and low-density buildings. Intensification is an opportunity to improve the quality of the build environment and deliver benefits for the local area while providing new housing and town centre uses.	
Site requirements and development guidelines:	<p>The site's high accessibility, town centre context and potential for tall buildings support a high density of redevelopment. Proposals must consider existing site uses, including retail, offices and residents. Car parking requirements must be assessed and re-provided as needed.</p> <p>Proposals must consider the site context which includes the Grade II listed Railway Hotel, the existing character of Station Road and the High Street, Edgware Primary School to the south, and adjacent low-rise suburban housing.</p> <p>Proposals must be subject to an archaeological assessment.</p> <p>The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.</p> <p>The potential risk of surface water flooding must be considered.</p> <p>The emerging Edgware Growth Area SPD provides further guidance.</p>		



Site No. 28	Edgware Underground & Bus Stations (Edgware Growth Area)		
Site Address:	Station Rd, Edgware, HA8 7AW		
	Ward:	Edgware	
	PTAL 2019:	6B	
	PTAL 2031:	6B	
	Site Size:	8.17 ha	
	Ownership:	TfL	


	Site source:	Call for Sites and Edgware Town Centre Framework (2013)	
	Context type:	Central	
	Existing or most recent site use/s:	Transport operations	
	Development timeframe:	6-10 years	
	Planning designations:	Town Centre; Site of Borough Importance for Nature Conservation	
	Relevant planning applications:	None	
Site description:	<p>The northern part is within Edgware Town Centre, facing onto the main shopping street, including Primary Shopping Frontage. The site encompasses Edgware Station, platforms and tracks, the bus garage with parking and access, along with areas of open land to the south and east. To the west is the Broadwalk Shopping Centre, classified as Primary Retail Frontage, with associated car parking. To the south and east is low-rise suburban housing, with the Watling Street Conservation Area adjacent to part of the site. Public transport accessibility is high for the northern and western elements of the site. The culverted Deans Brook runs through part of the site, and flood risk zone levels 2 and 3 overlaps the north eastern boundary of the site in some places. There is also some surface water flood risk. A Site of Borough Importance for Nature Conservation covers the south eastern parts of the site. Edgware is a strategic location for tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre.</p>		
Applicable Draft Local Plan policies:	<p>GSS01, GSS05, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY03, ECC02, ECC02A, TRC01, TRC02, TRC03</p>		
Proposed uses/ allocation (as a proportion of floorspace):	<p>70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure</p>		
Indicative residential capacity:	<p>2,317</p>		

	Justification:	The western parts of the site are highly accessible and provide a town centre location which is currently underused. The need to maintain the London Underground infrastructure, and the barriers imposed by this infrastructure, make the eastern and southern parts of the site far more challenging and restricted in terms of potential for redevelopment.
Site requirements and development guidelines:	<p>The site’s high accessibility, town centre context and potential for tall buildings support a high density of redevelopment in the western and northern parts of the site. . Bus operations and the function of the bus station must be protected or re-provided as part of any redevelopment. London Underground infrastructure and operations must also be maintained.</p> <p>Proposals must be subject to an archaeological assessment.</p> <p>Proposals should preserve the area of Borough Importance for Nature Conservation which covers the south eastern part of the site, including the areas around Deans Brook. . The SFRA Level 2 provides a detailed assessment of flood risks and the impact from climate change, and shows parts of the site are in Flood Zone 3 and at surface water flood risk. Where possible, proposals for the site should consider de-culverting of Deans Brook and inclusion of an appropriate buffer zone either side of the main river. Under no circumstances should built development be allowed on top of the culvert, and access should be maintained along the entire length.</p> <p>The scale of development is likely to require upgrades to the wastewater network. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure development does not outpace delivery of essential network upgrades.</p> <p>Proposals must carefully consider the context of the adjacent Watling Estate Conservation Area and surrounding low-rise suburban housing.</p> <p>The emerging Edgware Growth Area SPD provides further guidance.</p>	

Site No. 29	Scratchwood Quarry		
Site Address:	NW7 3JA		
	Ward:	Edgware	
	PTAL 2019:	0	
	PTAL 2031:	0	
	Site Size:	3.1 ha	
	Ownership:	C.F Cronin (London) Limited	
	Site source:	North London Waste Plan	
	Context type:	Urban	
	Existing or most recent site use/s:	Waste management	
	Development timeframe:	Potential to increase waste volume handled over the Plan Period	




	<p>Planning designations:</p>	<p>A previously developed site within the Green Belt; Archaeological Priority Area</p>	
	<p>Relevant planning applications:</p>	<p>None</p>	
	<p>Site description:</p>	<p>The site lies within a former quarry which is now used for waste processing. There is recycling of concretes and aggregates materials for highways maintenance and utilities industries. The site is leased over three plots, with current operational use on all three leased plots, although some of the site is underused/ part vacant.</p> <p>The site is located to the north of the raised M1 carriageway and adjacent to the Midland Main Line railway. Woodland surrounds the site on the other sides. Access is via a long service road which links to roads serving the M1. This is a previously developed site within the Green Belt. The site is also adjacent to Metropolitan SINC and a Local Nature Reserve.</p>	
	<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, ECC01, ECC02, ECC02A, ECC03, ECC05, ECC06</p>	
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>Waste management</p>	
	<p>Indicative residential capacity:</p>	<p>NA</p>	
	<p>Justification:</p>	<p>The site is remote from residential areas and is accessible via suitable roads.</p>	
<p>Site requirements and development guidelines:</p>	<p>There is potential to increase the volume of waste processed through the site by more efficient and intensive use.</p> <p>Proposals must be subject to an archaeological assessment.</p> <p>Any proposal must preserve the openness of the Green Belt and avoid harm to the SINC and Local Nature Reserve.</p>		



Site No. 30	Finchley Central Station (Finchley Central/ Church End Town Centre)		
Site Address:	Squires Lane/ Nether St/ Crescent St, Finchley N12 (railway verges and airspace above tracks and Finchley Central station)		
	Ward:	Finchley Church End and West Finchley	
	PTAL 2019:	6A	
	PTAL 2031:	6A	
	Site Size:	4.15 ha	
	Ownership:	Public (TfL)	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Station, retail	
	Development timeframe:	6-10 years	
	Planning designations:	Town Centre; Archaeological Priority Area	
Relevant planning applications:	None		

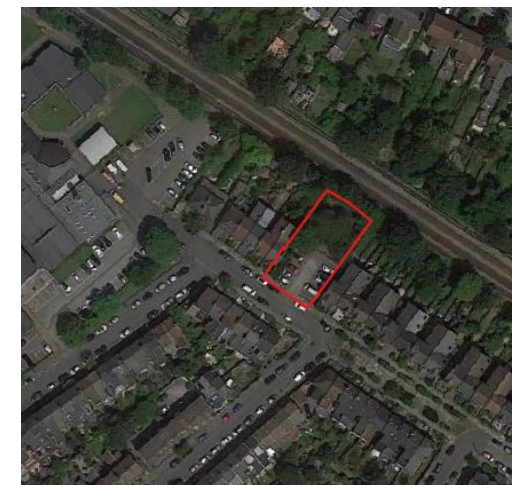
	<p>Site description:</p> <p>Comprises land at Finchley Central station located either side of Regents Park Road (A598) and either side of the railway tracks. The site extends beyond the town centre and includes Secondary Frontage at Station Road. Site uses include the station and car park, retail and office units on Nether Street and Station Road and vacant, incidental land adjacent to rail tracks. The Town Centre Strategy highlights 3 specific parcels of land -</p> <ul style="list-style-type: none"> • Site 4: 290-298 Nether Street: - poor quality buildings, numerous advertisements and cluttered nature has a negative impact on town centre townscape. • Site 5: Finchley Central Station car park (and land to the east): pedestrian environment between Ballards Lane and station has limited pavement space, lack of natural surveillance and generally poor-quality public realm. Part of the site is currently used as a commuter car park (267 surface parking spaces). • Site 6: Station Road: point of arrival for significant number of users of town centre. Buildings of a generally poor quality and fail to make effective use of the land. Builders' yard creates noise, disturbance and vehicle movements which impact on residential amenity. <p>The surrounding context is mixed, with a 9-storey office building (Central House) to the north of station, with other nearby taller buildings on the high street including the Travelodge hotel (6/7 storeys) and Gateway House (8 storeys). Ballards Lane/ Regents Park Road is lined with 3-4 storey buildings in retail and office uses. The north-western and south-eastern parts of the site are adjacent to 2-3 storey terraced housing. The Town Centre Strategy makes reference to a distinctive character within Church End known as the 'Finchley vernacular'. There is a Grade II listed cattle trough at junction of Ballards Lane/ Nether Street. Finchley Church End Conservation Area is located a short distance to the south west of the site.</p>
	<p>Applicable Draft Local Plan policies:</p> <p>GSS01, GSS08, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, TOW03, CHW02, TOW04, ECY01, ECY02, ECY03, ECC02, TRC01, TRC02, TRC03</p>
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p> <p>50% residential uses with 50% retained transport infrastructure, commercial uses and car parking</p>
	<p>Indicative residential capacity:</p> <p>556</p>
	<p>Justification:</p> <p>The site is a highly accessible town centre location that offers considerable potential for intensification.</p>

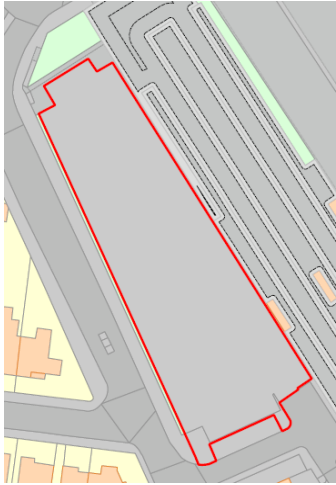


<p>Site requirements and development guidelines:</p>	<p>Comprehensive residential led development with improved access to the station from Regent’s Park Road and enhanced visual and functional connection between station and town centre.</p> <p>There is potential to deck over railway tracks, particularly at Regent’s Park Road overbridge, to optimise development potential and provide a continuous active frontage and strong visual link between Ballards Lane and Regent’s Park Road town centre frontages.</p> <p>There is potential for ‘meanwhile’ uses on parts of the site at the early stages of development to help create an identity and attraction. Development should create active and attractive frontages particularly along Regents Park Road / Ballards Lane, Station Road and Nether Street.</p> <p>Floorspace could take the form of flexible and affordable workspace, small / affordable shop units suitable for SMEs.</p> <p>Development should take into account proximity of Finchley Church End Conservation Area and respond to the ‘Finchley vernacular’ in a positive manner, including incorporation of design features and elements as appropriate.</p> <p>For any loss of car parking spaces an assessment must be undertaken and mitigation provided to encourage the use of public transport and active modes of travel. The development should reflect the ‘Healthy Streets Approach’ with improved interchange facilities for pedestrians and cyclists.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required. The detailed drainage strategy should be submitted with the planning application. Proposals must be subject to an archaeological assessment.</p> <p>Finchley Church End Town Centre is a strategic location for tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre.</p>
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Site No. 31	Brentmead Place (Major Thoroughfare)		
Site Address:	1-6 Brentmead Place (North Circular Road), Golder's Green, NW11 9JG		
	Ward:	Golders Green	
	PTAL 2019:	3	
	PTAL 2031:	3	
	Site Size:	0.27 ha	
	Ownership:	Public (TfL)	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Mostly an open site with two buildings.	
	Development timeframe:	0-5 years	



	<p>Planning designations:</p>	<p>None</p>	
	<p>Relevant planning applications:</p>	<p>None</p>	
	<p>Site description:</p>	<p>Adjacent to the North Circular Road (A406). Previous use of the site was residential; the houses were acquired by Department for Transport for a road widening scheme that was never brought forward. TfL demolished most of the homes on the site after they were vandalised and became unsafe. A synagogue occupies the two remaining houses on a short lease as a 'meanwhile use' prior to the site being comprehensively redeveloped. Surrounding buildings are large houses of 2-3 storeys. Site access is difficult.</p>	
	<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH04, CDH07, CHW02, ECC02, TRC01, TRC03</p>	
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>Residential</p>	
	<p>Indicative residential capacity:</p>	<p>46</p>	
	<p>Justification:</p>	<p>The site is underused and sits in an urban location, predominantly surrounded by housing.</p>	
<p>Site requirements and development guidelines:</p>	<p>The North Circular Road generates high levels of air and noise pollution which any proposal must assess and mitigate. Site accessibility issues must be resolved. The site is close to an Archaeological Priority Area and should be subject to an archaeological assessment.</p>		


Site No. 32	Manor Park Road car park		
Site Address:	72-76 Manor Park Rd, East Finchley, N2 0SJ		
	Ward:	East Finchley	
	PTAL 2019:	1A	
	PTAL 2031:	1A	
	Site Size:	0.08 ha	
	Ownership:	Council	
	Site source:	Council assets disposal programme	
	Context type:	Urban	
	Existing or most recent site use/s:	Public car park and small park	
	Development timeframe:	6-10 years	
	Planning designations:	None	
Relevant planning applications:	None		
	Site description:	An area formerly occupied by three terrace houses and surrounded by low-rise housing. The front part of the site is a public car park. The rear part of the site is occupied by a small public park with benches, lighting and fencing. The High Barnet Northern Line runs to the rear of the site.	
	Applicable Draft Local Plan policies:	GSS01, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CHW01, CHW02, ECC04, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	Residential	
	Indicative residential capacity:	7	
	Justification:	The open site is in a residential area where a suitable design could deliver new homes.	
Site requirements and development guidelines:	The scale of any redevelopment should be no higher than the adjoining terrace dwellings of 2-3 storeys. proposals for residential use must undertake an assessment of car parking needs. Any loss of public open space will require robust justification.		






Site No. 33	Bunns Lane Car park (Mill Hill Town Centre)			
Site Address:	Bunns Lane, Mill Hill, NW7 2AA			
	Ward:	Hale		
	PTAL 2019:	4		
	PTAL 2031:	5		
	Site Size:	0.33 ha		
	Ownership:	Council		
	Site source:	Council assets disposal programme		
	Context type:	Urban		
	Existing or most recent site use/s:	Car park (adjacent to Mill Hill station)		
	Development timeframe:	6-10 years		
	Planning designations:	None		
Relevant planning applications:	None			
	Site description:	Comprising the car park (184 spaces) for Mill Hill Broadway Station and the Town Centre. The car park is also used when Saracens are playing at home. The site is immediately adjacent to the Midland Main Railway on the eastern boundary, with the raised M1 carriageway immediately beyond. Mill Hill Broadway town centre is immediately to the east. To the west is low-rise suburban housing.		
	Applicable Draft Local Plan policies:	GSS01, GSS08, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, TOW01, TOW02, CHW02, ECY03, ECC02, TRC01, TRC02, TRC03		
	Proposed uses/ allocation (as a proportion of floorspace):	50% residential floorspace, 25% hotel floorspace and 25%, re-provision of car parking.		
	Indicative residential capacity:	43		
	Justification:	The site is highly accessible by public transport and is located adjacent to the shops and services of Mill Hill Broadway.		
				

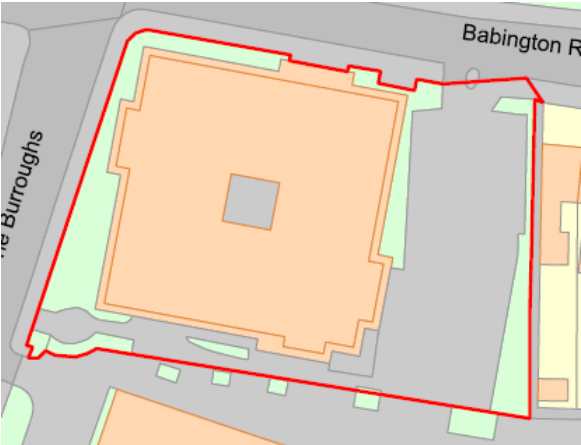


Site requirements and development guidelines:	While the site is highly accessible and close to local services, any development must fully assess and mitigate the air and noise pollution caused by the proximity to the raised motorway and mainline railway. Proposals must take into account existing residential areas to the west and south, including concern over potential overspill car parking; there may be further need to control for residents-only parking. Site characteristics, including connectivity, offer the potential for visitor accommodation, such as a hotel. The design must ensure active frontages facing on to Bunns Lane. Public car parking provision should also be assessed and provided as needed.
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Site No. 34	Burroughs Gardens Car park (Middlesex University and The Burroughs)		
Site Address:	The Burroughs, Hendon, NW4 4AU		
	Ward:	Hendon	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.06 ha	
	Ownership:	Council	
	Site source:	Emerging Burroughs and Middlesex University SPD	
	Context type:	Urban	
	Existing or most recent site use/s:	Public car park	
	Development timeframe:	0-5 years	
	Planning designations:	Conservation Area; Archaeological Priority Area	
Relevant planning applications:	None		
	Site description:	A small car park located in The Burroughs Conservation Area. Adjacent to 2-3 storey buildings in office and residential use. Public transport is provided by several bus routes which run along the Burroughs.	
	Applicable Draft Local Plan policies:	GSS01, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH08, CHW02, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	Residential	
	Indicative residential capacity:	9	
			

	<p>Justification:</p>	<p>The site presents an underutilised space within an urban area that can be intensified for residential development.</p>
<p>Site requirements and development guidelines:</p>	<p>The sensitive context of the Conservation Area, surrounding heritage assets and 2-3 storey buildings mean that any proposal must be of a suitable scale and design. Design proposals must take into account maintaining visibility of the heritage buildings to the rear of the site. The site is within an Archaeological Priority Area and must be subject to an archaeological assessment. Car parking requirements should be assessed, and spaces re-provided as needed. Further planning guidance will be provided by the emerging Burroughs and Middlesex University SPD.</p>	

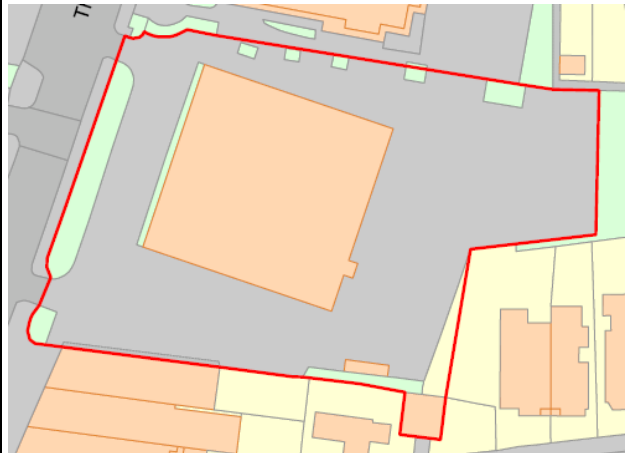

<p>Site No. 35</p>	<p>Egerton Gardens car park (Middlesex University and The Burroughs)</p>		
<p>Site Address:</p>	<p>The Burroughs, Hendon, NW4 8BD</p>		
	<p>Ward:</p>	<p>Hendon</p>	
<p>PTAL 2019:</p>	<p>4</p>		
<p>PTAL 2031:</p>	<p>4</p>		
<p>Site Size:</p>	<p>0.09 ha</p>		
<p>Ownership:</p>	<p>Council</p>		
<p>Site source:</p>	<p>Emerging Burroughs and Middlesex University SPD</p>		
<p>Context type:</p>	<p>Urban</p>		
<p>Existing or most recent site use/s:</p>	<p>Public car park</p>		
<p>Development timeframe:</p>	<p>0-5 years</p>		
<p>Planning designations:</p>	<p>None</p>		


	<p>Relevant planning applications:</p>	<p>None</p>	
	<p>Site description:</p>	<p>A small surface car park (29 spaces) that is close to the Burroughs Conservation Area and opposite a range of Grade II listed buildings, including Hendon Town Hall, Library and Fire Station. Middlesex University occupies many buildings in the area. The site is also within the immediate setting of two churches on The Burroughs/ Egerton Gardens which have been nominated for locally listing (Hendon Methodist Church and Our Lady of Delours Roman Catholic Church). Buildings adjacent to the site are 3-storeys with retail uses on the ground floor, while to the rear is a residential suburban road. Bus routes run along The Burroughs.</p>	
<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS12, HOU01, HOU02, HOU04, CDH01, CDH02, CDH03, CDH08, CHW02, TRC01, TRC03</p>		
<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>Residential</p>		
<p>Indicative residential capacity:</p>	<p>69 student halls of residence (equivalent to 23 standard residential units on the ratio that 3 student rooms are equivalent to 1 standard housing unit)</p>		
<p>Justification:</p>	<p>The site presents an underutilised space within a urban area that can be intensified for residential development.</p>		
<p>Site requirements and development guidelines:</p>	<p>Proposals must be of a suitable scale and style which reflects the design context of heritage assets and low-rise buildings. Accommodation will be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation. Car parking requirements should be assessed, and spaces re-provided as needed. The site adjoins an Archaeological Priority Area and must be subject to an archaeological assessment. Further planning guidance will be provided by the emerging Burroughs and Middlesex University SPD.</p>		

Site No. 36	Fenella (Middlesex University and The Burroughs)			
Site Address:	The Burroughs, Hendon, NW4 4BS			
	Ward:	Hendon		
	PTAL 2019:	4		
	PTAL 2031:	4		
	Site Size:	0.26 ha		
	Ownership:	Council		
	Site source:	Emerging Burroughs and Middlesex University SPD		
	Context type:	Urban		
	Existing or most recent site use/s:	Education		
Development timeframe:	0-5 years			
Planning designations:	None			
Relevant planning applications:	None			
	Site description:	A modern 2-storey office building owned by Council and currently used by Middlesex University for administrative functions; the surrounding area contains Middlesex University's main campus. The site is opposite a range of Grade II listed buildings, including Hendon Town Hall, Library and Fire Station and is close to both the Burroughs and Hendon Church End Conservation Areas. Surrounding buildings are of 2-4 storeys, while to the rear is a residential suburban road.		
	Applicable Draft Local Plan policies:	GSS01, HOU01, HOU02, HOU04, CDH01, CDH02, CDH03, CDH08, CHW01, CHW02, TRC01, TRC03		
	Proposed uses/ allocation (as a proportion of floorspace):	90% residential (halls of residence) floorspace with 10% educational uses		
	Indicative residential capacity:	180 student halls of residence (equivalent to 60 standard residential units on the ratio that 3 student rooms are equivalent to 1 standard housing unit)		
	Justification:	Greater use can be made of this well-located site to provide accommodation and for educational purposes.		
				

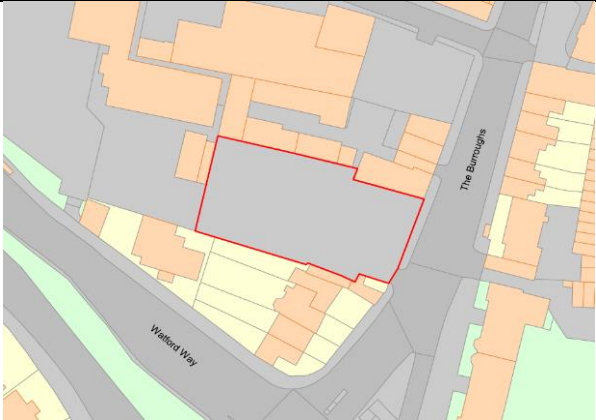


Site requirements and development guidelines:	The University’s future needs will be a key determinant for this site, with the potential to use part of the site for educational purposes such as a lecture hall. Proposals must be of a suitable scale and style which reflects the design context of heritage assets and low-rise buildings. Accommodation will be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation. The site adjoins an Archaeological Priority Area and must be subject to an archaeological assessment. Further guidance will be provided by the Emerging Burroughs and Middlesex University SPD.
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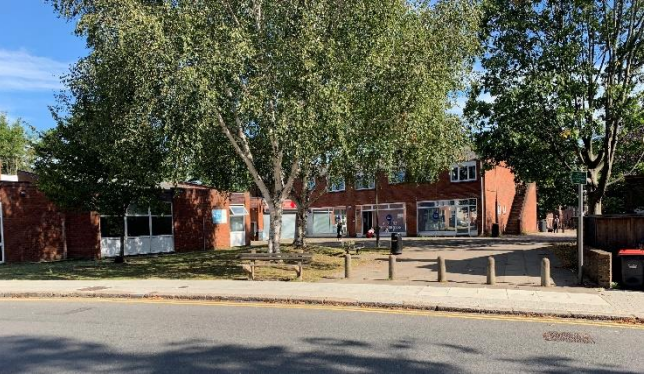

Site No.37	This site has been removed due to it being unlikely to come forward for redevelopment during the Local Plan period. The site number is being retained to provide consistency of site numbering between the Plan versions.
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Site No. 38	Ravensfield House (Middlesex University and The Burroughs)		
Site Address:	The Burroughs, Hendon, NW4 4BT		
	Ward:	Hendon	
	PTAL 2019:	3	
	PTAL 2031:	4	
	Site Size:	0.36 ha	
	Ownership:	Council	
	Site source:	Emerging Burroughs and Middlesex University SPD	
	Context type:	Urban	
	Existing or most recent site use/s:	Community meeting facility	
	Development timeframe:	0-5 years	
	Planning designations:	None	
Relevant planning applications:	None		



	Site description:	A modern 2-storey building owned by Council but currently being used by Middlesex University. The site is opposite a range of Grade II listed buildings, including Hendon Town Hall, Library and Fire Station and is close to both the Burroughs and Hendon Church End Conservation Areas. Surrounding buildings adjacent to the site are of 2-3 storeys, while to the rear is toward low-rise residential areas. Bus routes run along the Burroughs.	
	Applicable Draft Local Plan policies:	GSS01, HOU01, HOU02, HOU04, CDH01, CDH02, CDH03, CDH08, CHW01, CHW02, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	90% residential floorspace with 10% educational uses floorspace.	
	Indicative residential capacity:	252 student halls of residence (equivalent to 84 standard residential units on the ratio that 3 student rooms is taken as equivalent of 1 new housing unit)	
	Justification:	Greater use can be made of this well-located site to provide accommodation and for educational purposes.	
Site requirements and development guidelines:	The University's future needs will be a key determinant for this site, with the potential to use part of the site for educational purposes such as a lecture hall. Proposals must be of a suitable scale and style which reflects the design context of heritage assets and low-rise buildings. Accommodation will be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation. The site adjoins an Archaeological Priority Area and must be subject to an archaeological assessment. Further guidance will be provided by the Emerging Burroughs and Middlesex University SPD.		

Site No. 39	The Burroughs car park (Middlesex University and The Burroughs)		
Site Address:	The Burroughs, Hendon, NW4 4AR		
	Ward:	Hendon	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.13 ha	
	Ownership:	Council	
	Site source:	Emerging Burroughs and Middlesex University SPD	
	Context type:	Urban	
	Existing or most recent site use/s:	Car parking	
	Development timeframe:	0-5 years	



	<table border="1"> <tr> <td>Planning designations:</td> <td>Conservation Area; Archaeological Priority Area</td> </tr> <tr> <td>Relevant planning applications:</td> <td>None</td> </tr> </table>	Planning designations:	Conservation Area; Archaeological Priority Area	Relevant planning applications:	None												
Planning designations:	Conservation Area; Archaeological Priority Area																
Relevant planning applications:	None																
	<table border="1"> <tr> <td>Site description:</td> <td colspan="2">A public car park (46 spaces) located in The Burroughs Conservation Area. The site is adjacent to 2-3 storey buildings in office and residential use. Bus routes run along the Burroughs.</td> </tr> <tr> <td>Applicable Draft Local Plan policies:</td> <td colspan="2">GSS01, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH08, CHW02, TRC01, TRC03</td> </tr> <tr> <td>Proposed uses/ allocation (as a proportion of floorspace):</td> <td colspan="2">Residential</td> </tr> <tr> <td>Indicative residential capacity:</td> <td colspan="2">21</td> </tr> <tr> <td>Justification:</td> <td colspan="2">The site presents an underutilised space within a urban area that can be intensified for residential development.</td> </tr> </table>		Site description:	A public car park (46 spaces) located in The Burroughs Conservation Area. The site is adjacent to 2-3 storey buildings in office and residential use. Bus routes run along the Burroughs.		Applicable Draft Local Plan policies:	GSS01, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH08, CHW02, TRC01, TRC03		Proposed uses/ allocation (as a proportion of floorspace):	Residential		Indicative residential capacity:	21		Justification:	The site presents an underutilised space within a urban area that can be intensified for residential development.	
Site description:	A public car park (46 spaces) located in The Burroughs Conservation Area. The site is adjacent to 2-3 storey buildings in office and residential use. Bus routes run along the Burroughs.																
Applicable Draft Local Plan policies:	GSS01, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH08, CHW02, TRC01, TRC03																
Proposed uses/ allocation (as a proportion of floorspace):	Residential																
Indicative residential capacity:	21																
Justification:	The site presents an underutilised space within a urban area that can be intensified for residential development.																
<p>Site requirements and development guidelines:</p>	<p>The sensitive context of the Conservation Area, surrounding heritage assets and 2-3 storey buildings mean that any proposal must be of a suitable scale and design. Design proposals must take into account maintaining visibility of the heritage buildings to the rear of the site. Car parking requirements should be assessed, and spaces re-provided as needed. The site is within an Archaeological Priority Area and must be subject to an archaeological assessment. Further planning guidance will be provided by the emerging Burroughs and Middlesex SPD.</p>																


Site No. 40	Meritage Centre (Middlesex University and The Burroughs)		
Site Address:	28-46 Meritage Centre, Church End Hendon NW4 4JT		
	Ward:	Hendon	
	PTAL 2019:	2	
	PTAL 2031:	2	
	Site Size:	0.33 ha	
	Ownership:	Council	
	Site source:	Emerging Burroughs and Middlesex University SPD	
	Context type:	Urban	
	Existing or most recent site use/s:	Office/ Community Space with associated car parking	
Development timeframe:	0-5 years		
Planning designations:	Conservation Area; Archaeological Priority Area		
Relevant planning applications:	None		
	Site description:	The site contains a modern, low-rise building providing a community service for elderly people. Within the curtilage are areas of landscaping, including mature trees, and a car park. The site is within the Church End Conservation Area and is within the immediate setting of the Grade II* listed St Mary's Parish Church.	
	Applicable Draft Local Plan policies:	GSS01, HOU01, HOU02, HOU04, CDH01, CDH02, CDH03, CDH07, CDH08, CHW01, CHW02, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	50% residential floorspace and 50% community floorspace	
	Indicative residential capacity:	108 student halls of residence (equivalent to 36 standard residential units on the ratio that 3 student rooms are equivalent to 1 standard housing unit)	
	Justification:	The site can be intensified to provide residential accommodation and community uses.	
			

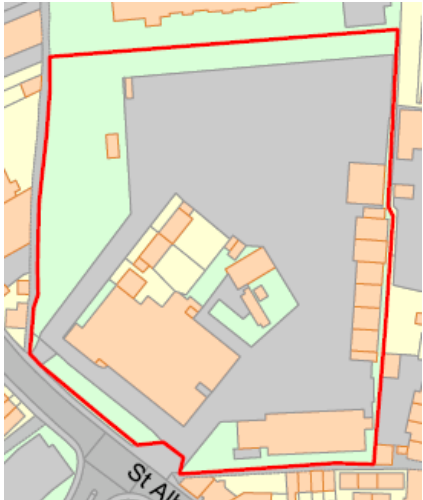


Site requirements and development guidelines:	The Meritage Centre is community infrastructure and must be re-provided either on site or at a suitable alternative location. The Hendon Conservation Area Character Appraisal acknowledges that the Meritage Centre is a possible future site for redevelopment. Any proposals need to be sensitive in relation to the heritage assets and should reinforce local distinctiveness, with consideration given to the location within the conservation area and directly adjoining the Grade II* listed St Mary’s Parish Church. Proposals should also seek to retain the two mature birch trees located in the courtyard area. The site is within an Archaeological Priority Area and must be subject to an archaeological assessment. Accommodation could be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation. Further planning guidance will be provided by the emerging Burroughs and Middlesex University SPD.
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Site No. 41	PDSA and Fuller St car park (Middlesex University and The Burroughs)		
Site Address:	The Burroughs, Hendon, NW4 4BE		
	Ward:	Hendon	
	PTAL 2019:	2	
	PTAL 2031:	2	
	Site Size:	0.23 ha	
	Ownership:	Mixed	
	Site source:	Emerging Burroughs and Middlesex University SPD	
	Context type:	Urban	
	Existing or most recent site use/s:	Animal hospital, residential, garages and car parking	
	Development timeframe:	0-5 years	
	Planning designations:	Archaeological Priority Area	
Relevant planning applications:	None		
	Site description:	The site includes an animal hospital (PDSA), four residential units, garages and a car park that are associated with the surrounding residential units; it should be noted that on street parking in the area is very limited. The PDSA is located very close to the eastern boundary of the Hendon, Church End conservation area and is also in the vicinity of listed and locally listed buildings. Surrounding buildings to the south and east are mostly low-rise residential in character, while to the north is St Mary’s and St John’s Primary School.	
	Applicable Draft Local Plan policies:	GSS01, HOU01, HOU02, HOU04, CDH01, CDH02, CDH03, CDH07, CDH08, CHW01, CHW02, ECY01, TRC01, TRC03	
			

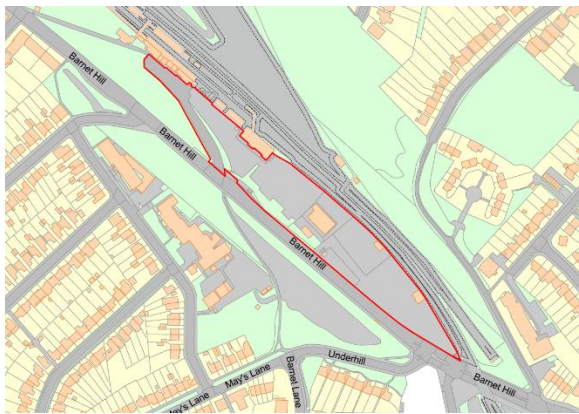

	Proposed uses/ allocation (as a proportion of floorspace):	50% residential floorspace and 50% community uses floorspace
	Indicative residential capacity:	48 student halls of residence (equivalent to 16 standard residential units on the ratio that 3 student rooms are equivalent to 1 standard housing unit)
	Justification:	The site can be intensified to provide residential accommodation and community uses.
Site requirements and development guidelines:	The PDSA is a well-established use in the area and provides an important service to the community due to its charitable function. It is one of only three PDSA Hospitals in London. As such the use should either be re-provided on site, or at a suitable alternative location. Any proposal must consider impact on the proximate heritage assets, including the Hendon, Church End Conservation Area and nationally and locally listed buildings. The site is within an Archaeological Priority Area and must be subject to an archaeological assessment. Accommodation could be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation. Further planning guidance will be provided by the emerging Burroughs and Middlesex University SPD.	


Site No. 42	Usher Hall (Middlesex University and The Burroughs)		
Site Address:	The Burroughs, Hendon, NW4 4HE		
	Ward:	Hendon	
	PTAL 2019:	3	
	PTAL 2031:	4	
	Site Size:	0.44 ha	
	Ownership:	Public (Middlesex University)	
	Site source:	Emerging Burroughs and Middlesex University SPD	
	Context type:	Urban	
	Existing or most recent site use/s:	Student housing	
	Development timeframe:	5-10 years	
	Planning designations:	None	
	Relevant planning applications:	None	
			

	<p>Site description:</p>	<p>Purpose-built 4-storey student accommodation with car parking to the rear. On the opposite side of The Burroughs is a range of Grade II listed buildings including the Middlesex University main building, along with Hendon Library, Fire Station and Town Hall. Hendon Church End Conservation Area lies immediately to the north of the site. Public transport is provided by bus routes which run along the Burroughs.</p>	
	<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, HOU01, HOU02, HOU04, CDH01, CDH02, CDH03, CDH07, CDH08, CHW02, TRC01, TRC03</p>	
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>Residential accommodation for students</p>	
	<p>Indicative residential capacity:</p>	<p>117 student halls of residence (equivalent to 39 standard residential units on the ratio that 3 student rooms are equivalent to 1 standard housing unit)</p>	
	<p>Justification:</p>	<p>The site can be intensified to provide a greater quantum of student accommodation.</p>	
<p>Site requirements and development guidelines:</p>	<p>Proposals must be of a suitable scale and style which reflects the design context of heritage assets and surrounding buildings. The existing use of the building as student halls of residence is expected to be retained – the indicative capacity shown is on the basis of a net-increase and at the ratio of three student rooms to one conventional unit of accommodation. The site adjoins an Archaeological Priority Area and must be subject to an archaeological assessment. Further guidance will be provided by the emerging Burroughs and Middlesex University SPD.</p>		




Site No. 43	Army Reserve Depot (Chipping Barnet Town Centre)		
Site Address:	St Alban's Rd, Chipping Barnet, EN5 4JX		
	Ward:	High Barnet	
	PTAL 2019:	3	
	PTAL 2031:	3	
	Site Size:	1.26 ha	
	Ownership:	Public (MoD)	
	Site source:	The Spires Planning Framework (2012)	
	Context type:	Urban	
	Existing or most recent site use/s:	Territorial Army drill hall, ancillary buildings and yard.	
	Development timeframe:	0-5 years	
	Planning designations:	Archaeological Priority Area	
Relevant planning applications:	None		
	Site description:	The current site does not link or relate to the surrounding residential area and does not permit access between St Albans Road to roads to the rear of the site. It is predominantly surrounded by small scale residential and retail units. Due to security issues relating to its present use the site has a 'closed' appearance and is out of character with the street scene and surrounding uses. The site is only accessible from St Albans Road. Pedestrian connections to Chipping Barnet Town Centre are poor. Mature trees help define the site's character. The site is adjacent to Chipping Barnet Town Centre and the Monken Hadley Conservation Area and is close to the Grade II listed Christ Church and Locally listed White Lion Pub and 39-41 St Albans Road.	
	Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CDH08, TOW01, CHW01, CHW02, ECY01, ECY02, ECY03, TRC01, TRC03.	
	Proposed uses/ allocation (as a proportion of floorspace):	90% residential floorspace with 10% commercial, business and services uses	
	Indicative residential capacity:	193	
	Justification:	Vacation of the site by the current user provides an opportunity for new uses and more intensive development that are appropriate in this accessible location on the edge of the town centre.	
			

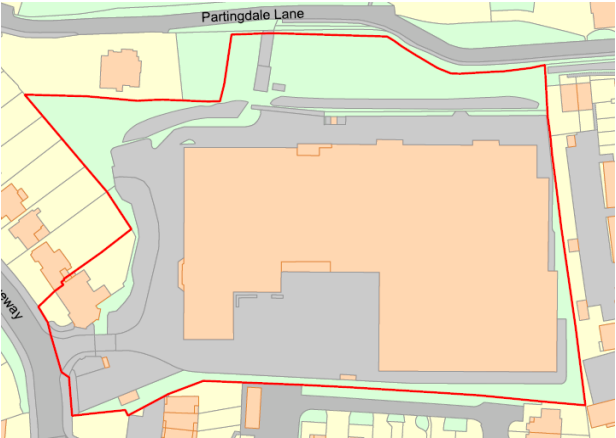

Site requirements and development guidelines:	New residential development with potential for commercial, business and services use elements will strengthen the vitality and viability of the town centre. This is an opportunity to provide family housing in an accessible location. The design should reflect the context of the surrounding residential grain, building heights and heritage. Mature trees on the site should be retained. Improvements to key road junctions, including Stapylton Road/ St Albans Road and St Albans Road/ A1000, should be investigated and any improvements deemed necessary should be implemented. Enhancements should be sought for pedestrian connectivity between residential areas and the town centre through enhancing existing footpaths and reopening routes to recreate historical connectivity. The site is within an Archaeological Priority Area and must be subject to an archaeological assessment.
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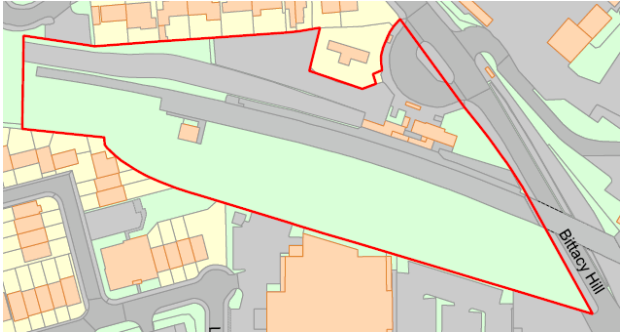


Site No. 44	High Barnet Station (Chipping Barnet Town Centre)		
Site Address:	Great North Rd, Chipping Barnet, EN5 5P		
	Ward:	High Barnet	
	PTAL 2019:	6	
	PTAL 2031:	6	
	Site Size:	1.50 ha	
	Ownership:	Public (TfL)	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Public car parking and B-use storage and business	
	Development timeframe:	6-10 years	
	Planning designations:	None	
Relevant planning applications:	None		
		Site description:	This is land to south west of High Barnet station and tracks, fronting the A1000 Barnet Hill / Great North Road. It is currently used as a commuter car park (157 spaces), a range of low-density B-uses including vehicle hire, scaffolding and self-storage facilities in temporary structures and vacant, incidental land around the railway. Levels change significantly across the site and in the surrounding area, rising (quite steeply in places) to the northwest. The site is within 400m of Chipping Barnet Town Centre. It is located on one of the highest points (134 metres above sea level) of the Barnet Plateau. There are no statutorily or locally listed buildings close to the site, and it is not within a conservation area or its setting. There is a wooded area to the west (containing Tree Preservation Orders), provides opportunities for placemaking and maximising residential amenity.

	Applicable Draft Local Plan policies:	GSS01, GSS08, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CHW02, ECY01, ECY02, ECY03, TRC01, TRC02, TRC03
	Proposed uses/ allocation (as a proportion of floorspace):	75% residential floorspace with 25% commercial uses, public realm and public car parking. Designated within UDP (2006) as Site 26 supporting B1 uses, hotel and leisure.
	Indicative residential capacity:	292
	Justification:	The site is highly accessible by public transport and is close to Chipping Barnet town centre, making this location suitable for intensification.
Site requirements and development guidelines:	Comprehensive residential led development which will improve the sense of arrival and of place at entrances to High Barnet station, creating a new public space and improving visual connectivity. Seek opportunities for public realm improvements from station entrances up the hill to Chipping Barnet Town Centre and pedestrian connections to Great North Road Local Centre. There is potential for meanwhile uses on parts of the site at the early stages of development to help create an identity and attraction. The development should create active and attractive frontages along Barnet Hill. This is not in a Tall Buildings Location - 8 storeys or more would not be appropriate. Meanwhile use floorspace could take the form of flexible and affordable workspace, small / affordable shop units suitable for SMEs. An assessment must be undertaken of public car parking spaces lost and replacement spaces may be required. Development must reflect the 'Healthy Streets Approach' with improved interchange facilities for pedestrians and cyclists.	

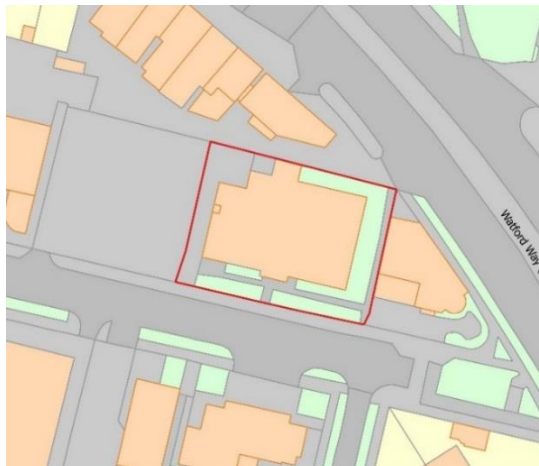

Site No. 45	Land at Whalebones		
Site Address:	Wood St, Chipping Barnet, EN5 4BZ		
	Ward:	High Barnet	
	PTAL 2019:	2	
	PTAL 2031:	2	
	Site Size:	2.20 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Suburban	
	Existing or most recent site use/s:	Agriculture, community facilities	


	<table border="1"> <tr> <td>Development timeframe:</td> <td>0-5 years</td> </tr> <tr> <td>Planning designations:</td> <td>Conservation Area</td> </tr> <tr> <td>Relevant planning applications:</td> <td>19/3949/FUL (REFUSED) 152 residential units, public open spaces</td> </tr> </table>	Development timeframe:	0-5 years	Planning designations:	Conservation Area	Relevant planning applications:	19/3949/FUL (REFUSED) 152 residential units, public open spaces										
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	<table border="1"> <tr> <td>Site description:</td> <td colspan="2">The site forms part of Wood Street Conservation area and comprises a largely green and undeveloped area, consisting in the west and north of open fields with some tree cover, and in the east of a more heavily-treed field. Whalebones House itself and the extensive surrounding garden are in private ownership and are not part of the site. The surrounding area consists of large suburban houses. To the west there has been recent residential development at Elmbank of 114 units. Barnet Hospital lies to the south. There is access to bus routes serving Barnet Hospital and Wood Street.</td> </tr> <tr> <td>Applicable Draft Local Plan policies:</td> <td colspan="2">GSS01, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CDH08, CHW01, CHW02, ECC02, ECC04, ECC06, TRC01, TRC03</td> </tr> <tr> <td>Proposed uses/ allocation (as a proportion of floorspace):</td> <td colspan="2">90% residential with 10% local open space and community facilities.</td> </tr> <tr> <td>Indicative residential capacity:</td> <td colspan="2">152</td> </tr> <tr> <td>Justification:</td> <td colspan="2">The site presents an area of undeveloped land that is close to the services and transport links of Chipping Barnet Town Centre. The site is not currently accessible by the public and development provides an opportunity to deliver public open space.</td> </tr> </table>		Site description:	The site forms part of Wood Street Conservation area and comprises a largely green and undeveloped area, consisting in the west and north of open fields with some tree cover, and in the east of a more heavily-treed field. Whalebones House itself and the extensive surrounding garden are in private ownership and are not part of the site. The surrounding area consists of large suburban houses. To the west there has been recent residential development at Elmbank of 114 units. Barnet Hospital lies to the south. There is access to bus routes serving Barnet Hospital and Wood Street.		Applicable Draft Local Plan policies:	GSS01, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CDH08, CHW01, CHW02, ECC02, ECC04, ECC06, TRC01, TRC03		Proposed uses/ allocation (as a proportion of floorspace):	90% residential with 10% local open space and community facilities.		Indicative residential capacity:	152		Justification:	The site presents an area of undeveloped land that is close to the services and transport links of Chipping Barnet Town Centre. The site is not currently accessible by the public and development provides an opportunity to deliver public open space.	
Site description:	The site forms part of Wood Street Conservation area and comprises a largely green and undeveloped area, consisting in the west and north of open fields with some tree cover, and in the east of a more heavily-treed field. Whalebones House itself and the extensive surrounding garden are in private ownership and are not part of the site. The surrounding area consists of large suburban houses. To the west there has been recent residential development at Elmbank of 114 units. Barnet Hospital lies to the south. There is access to bus routes serving Barnet Hospital and Wood Street.																
Applicable Draft Local Plan policies:	GSS01, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CDH08, CHW01, CHW02, ECC02, ECC04, ECC06, TRC01, TRC03																
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Indicative residential capacity:	152																
Justification:	The site presents an area of undeveloped land that is close to the services and transport links of Chipping Barnet Town Centre. The site is not currently accessible by the public and development provides an opportunity to deliver public open space.																
<p>Site requirements and development guidelines:</p>	<p>This sensitive character of this site means that proposals must have great attention to how the design corresponds to the historical and local context, and addresses local needs. There must be retention of trees and other natural features, with the introduction of new pedestrian access points and woodland walks which benefit the local community and users of Barnet Hospital. Residential development to west of Whalebones House, adjacent to the Elmbank development, will help to integrate the site into the surrounding suburbs. There should be provision of a new Local Open Space and a community facility, subject to legal agreement with developer on continuing management and maintenance. The site adjoins an Archaeological Priority Area and must be subject to an archaeological assessment. The design must reflect the site location in the Wood Street Conservation area and the surrounding suburban and historic character. Planning application (19/3949/FUL) was refused for 152 residential units and public open spaces.</p>																

Site No. 46	IBSA House (Mill Hill East Growth Area)		
Site Address:	The Ridgeway, Mill Hill, NW7 1RN		
	Ward:	Mill Hill	
	PTAL 2019:	1B	
	PTAL 2031:	1B	
	Site Size:	2.08 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Suburban	
	Existing or most recent site use/s:	Office / light industrial / storage and distribution	
	Development timeframe:	0-5 years	
	Planning designations:	Green Belt (on part of the site)	
Relevant planning applications:	19/6551/FUL 197 residential units; 18/1998/PNO (refused)		
	Site description:	The site contains the print works and offices for International Bible Students Association within a modern 5-storeys building on the Finchley Ridge. The site is adjacent to residential areas of the Millbrook Park development. To the north of the site is Green Belt, with the designation overlapping part of the site alongside Partingdale Lane.	
	Applicable Draft Local Plan policies:	GSS01, GSS07, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CHW02, ECY01, ECY02, ECY03, ECC05, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	Residential only	
	Indicative residential capacity:	197 as per 19/6551/FUL	
	Justification:	The owners and users of the site are leaving the site, providing an opportunity for more effective and intensive use.	
Site requirements and development guidelines:	Proposals must be of appropriate scale and design that responds to the context. There should be delivery of high quality residential development comprising a range of housing types and tenures, including family homes. Proposals must ensure development does not negatively affect the small area of Green Belt at the north of the site. The potential for the development to increase traffic must be assessed and mitigated.		

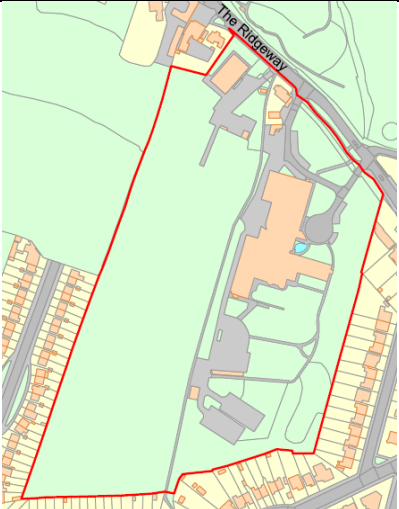


Site No. 47	Mill Hill East Station (Mill Hill East Growth Area)			
Site Address:	Bittacy Hill, Mill Hill, NW7 1BS – airspace above and land adjoining station			
	Ward:	Mill Hill		
	PTAL 2019:	3		
	PTAL 2031:	3		
	Site Size:	1.24 ha		
	Ownership:	Public (non-Council)		
	Site source:	Call for sites		
	Context type:	Urban		
	Existing or most recent site use/s:	Railway station, platforms and lines, with public car parking and unused bordering land		
	Development timeframe:	11-15 years		
	Planning designations:	None		
Relevant planning applications:	None			
	<p>Site description: The site includes Mill Hill East Station building, platform and tracks, along with the public car park (42 spaces) and overgrown adjacent strip of land. The large, partially completed Mill Brook Park development is across Bittacy Hill road to the north east of the site. To the north is low-density two-storey housing, while to the south is a supermarket and gym surrounded by large areas of surface car parking.</p>			
	Applicable Draft Local Plan policies:	GSS01, GSS07, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CHW02, ECC06, TRC01, TRC02, TRC03		
	Proposed uses/ allocation (as a proportion of floorspace):	60% residential floorspace with 40% retained rail infrastructure and car parking.		
	Indicative residential capacity:	127		
	Justification:	The site is accessible by public transport and is could be intensified to provide residential uses.		
				

Site requirements and development guidelines:	<p>The varied surroundings to the site mean that the design must be sensitive in terms intensification; for example, the southern boundary towards the supermarket provides greater scope for building height than towards the low-rise housing to the west. Preservation of mature trees required. The station building and associated platforms and tracks must be retained and/ or re-provided.</p> <p>The scale of development is likely to require upgrades of the water supply network infrastructure. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing phasing plan to ensure development does not outpace delivery of essential network upgrades.</p> <p>An assessment of public car parking requirements must be undertaken and mitigation provided to encourage the use of public transport and active modes of travel.</p>
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Site No. 48	Mill Hill Library (Mill Hill Town Centre)		
Site Address:	Hartley Avenue, NW7 2HX		
	Ward:	Mill Hill	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.17 ha	
	Ownership:	Council	
	Site source:	Council assets disposal programme	
	Location type:	Urban	
	Existing or most recent site use/s:	Public library and associated car parking	
	Development timeframe:	0-5 years	
	Planning designations:	Local Heritage List	
Relevant planning applications:	None		
	Site description:	<p>Mill Hill Library is a single storey Neo-Georgian building in red brick with stone portico and slate tiled roof which was built in 1937. The building has been nominated for the Local Heritage List.</p> <p>The curtilage includes a border of landscaping, along with an access road to a rear car park.</p> <p>Opposite lies the fire station built in a similar civic style. To the west of the site is a car park while to the east is a three-storey officer building. The location is close to Mill Hill district centre and lies close to the A1 arterial road. Mill Hill station is within approximately 500m.</p>	
	Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH08, TOW01, TOW02, CHW01, CHW02, TRC01, TRC02	
			


	Proposed uses/ allocation (as a proportion of floorspace):	50% residential floorspace with 50% community uses
	Indicative residential capacity:	19
	Justification:	The library use is leaving the building, allowing the site to be used for other purposes suitable to this accessible and edge-of-town-centre location.
Site requirements and development guidelines:	<p>The library is community infrastructure and must be re-provided either on site or at a suitable alternative location.</p> <p>Due to the proposed Local Heritage listing, proposals should retain the existing building and sensitivity integrate new uses or additional buildings.</p> <p>Good accessibility to the Mill Hill district centre and transport links will help to support new uses on this site.</p>	

Site No. 49	Watchtower House & Kingdom Hall (Mill Hill Growth Area)		
Site Address:	The Ridgeway, Mill Hill, NW7 1RS/ 1RL		
	Ward:	Mill Hill	
	PTAL 2019:	1B	
	PTAL 2031:	1B	
	Site Size:	7.31 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Green Belt with existing buildings on parts of the site	
	Existing or most recent site use/s:	Sui generis religious community	
	Development timeframe:	6-10 years	
	Planning designations:	Green Belt; Conservation Area; Major Developed Site in the Green Belt (UDP 2006)	

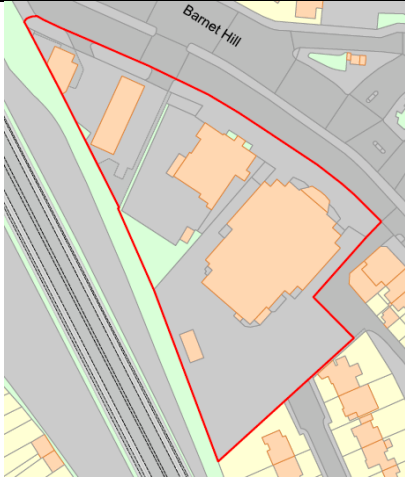


	<p>Relevant planning applications:</p>	<p>None</p>	
	<p>Site description:</p>	<p>A large site with extensive open spaces that is within designated Green Belt and the Mill Hill Conservation Area, previously classified as a Major Development Site within the Green Belt. There is a broad west/ east split, with the eastern half of the site containing a sprawling complex, largely over three storeys, which provides 85 self-contained residential units and ancillary services for staff of the International Bible Students Association (IBSA), at nearby IBSA House. There are also extensive gardens and car parking. The western half of the site comprises a Kingdom Hall with a large, open field. The site has numerous mature trees and is subject to an Area Tree Preservation Order. A public footpath bisects the site north-south. The land falls sharply from north to south, providing good views towards London. Suburban roads of semi-detached housing surround the site to the south, east and west, with The Ridgeway Road to the north.</p>	
<p>Applicable Draft Local Plan policies:</p>		<p>GSS01, GSS07, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CHW02, ECC05, ECC06, TRC01, TRC03</p>	
<p>Proposed uses/ allocation (as a proportion of floorspace):</p>		<p>80% retained as undeveloped Green Belt with 18% residential and 2% community floorspace</p>	
<p>Indicative residential capacity:</p>		<p>224</p>	
<p>Justification:</p>		<p>The existing user plans to vacate the site and the extant built areas are suitable for housing and community uses.</p>	



Site requirements and development guidelines:	The quantum and design of redevelopment are significantly constrained by numerous factors, including the low level of public transport access, the suburban semi-rural character, the Green Belt and Conservation Area status, the very prominent position at the top of the ridge, and trees subject to TPOs. Local wildlife must be protected both from development and disturbance during development. The public footpath traversing the site must be retained. Any proposal seeking development that is not within the area of previously developed land must demonstrate very special circumstances.
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Site No. 50	Watford Way & Bunns Lane (Major Thoroughfare)		
Site Address:	Adjacent to Watford Way, Mill Hill, NW7 2EX		
	Ward:	Mill Hill	
	PTAL 2019:	1B	
	PTAL 2031:	2	
	Site Size:	0.86 ha	
	Ownership:	TfL	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Vacant (former motorway ramp & verges)	
	Development timeframe:	5-10 years	
	Planning designations:	None	
Relevant planning applications:	None		
	Site description:	An overgrown site on a disused road connection. The site's eastern boundary is along the raised Watford Way (A1), with the remainder of the boundary running to the rear of 2-3 storey residential properties along Bunns Lane and other local streets. The site does not have direct access to the public highway, other than the A1 which would not be suitable due to safety issues of vehicles joining a busy, raised three-carriageway road. A raised public footpath crosses the site.	
	Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CHW02, ECC02, ECC06, TRC01, TRC03	
			

	Proposed uses/ allocation (as a proportion of floorspace):	Residential
	Indicative residential capacity:	105
	Justification:	The site is unused and provides an opportunity for new housing in a residential area.
Site requirements and development guidelines:	<p>Proposals must demonstrate how adequate access to site will be secured. Critically, the design must manage and mitigate air pollution and noise from the adjoining A1 road and must also ensure the amenity of neighbouring residential properties is maintained or improved. As assessment of the trees must be undertaken with the objective of preserving mature and high-quality specimens or mitigating on-site through re-planting. The public footpath route through the site must be maintained.</p> <p>This scale of development is likely to require upgrades of the water supply network infrastructure. The developer and the Council should liaise with Thames Water at the earliest opportunity to agree a housing phasing plan to ensure development does not outpace delivery of essential network upgrades.</p>	

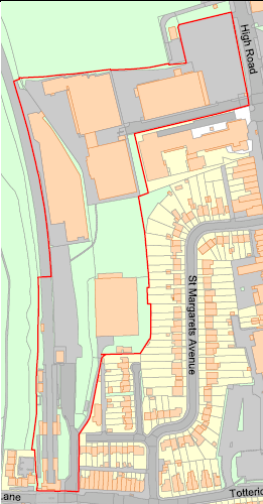


No. 51	Great North Road Local Centre (Major Thoroughfare)		
Site Address:	Great North Rd, New Barnet, EN5 1AB		
	Ward:	Oakleigh	
	PTAL 2019:	4	
	PTAL 2031:	5	
	Site Size:	0.81 ha	
	Ownership:	The Leathersellers' Company	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Cinema, public house and service station	
	Development timeframe:	6-10 years	

	<table border="1"> <tr> <td>Planning designations:</td> <td>None</td> </tr> <tr> <td>Relevant planning applications:</td> <td>None</td> </tr> </table>	Planning designations:	None	Relevant planning applications:	None												
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Relevant planning applications:	None																
	<table border="1"> <tr> <td>Site description:</td> <td colspan="2">This site is part of the Great North Road Local Centre which includes the recently refurbished Grade II listed cinema, public house and petrol station. The site is next to a junction of the Great North Road. To the rear is a railway line embankment, along which is a Site of Borough Importance for Nature Conservation. High Barnet Station is within ½ km.</td> </tr> <tr> <td>Applicable Draft Local Plan policies:</td> <td colspan="2">GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH08, TOW01, TOW04, CHW02, CHW04, TRC01, TRC03</td> </tr> <tr> <td>Proposed uses/ allocation (as a proportion of floorspace):</td> <td>40% residential floorspace with 60% of floorspace in use as a cinema and public house</td> <td></td> </tr> <tr> <td>Indicative residential capacity:</td> <td>84</td> <td></td> </tr> <tr> <td>Justification:</td> <td colspan="2">The site is accessible and presents an opportunity for intensification while seeking to maintain the existing important uses.</td> </tr> </table>		Site description:	This site is part of the Great North Road Local Centre which includes the recently refurbished Grade II listed cinema, public house and petrol station. The site is next to a junction of the Great North Road. To the rear is a railway line embankment, along which is a Site of Borough Importance for Nature Conservation. High Barnet Station is within ½ km.		Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH08, TOW01, TOW04, CHW02, CHW04, TRC01, TRC03		Proposed uses/ allocation (as a proportion of floorspace):	40% residential floorspace with 60% of floorspace in use as a cinema and public house		Indicative residential capacity:	84		Justification:	The site is accessible and presents an opportunity for intensification while seeking to maintain the existing important uses.	
Site description:	This site is part of the Great North Road Local Centre which includes the recently refurbished Grade II listed cinema, public house and petrol station. The site is next to a junction of the Great North Road. To the rear is a railway line embankment, along which is a Site of Borough Importance for Nature Conservation. High Barnet Station is within ½ km.																
Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH08, TOW01, TOW04, CHW02, CHW04, TRC01, TRC03																
Proposed uses/ allocation (as a proportion of floorspace):	40% residential floorspace with 60% of floorspace in use as a cinema and public house																
Indicative residential capacity:	84																
Justification:	The site is accessible and presents an opportunity for intensification while seeking to maintain the existing important uses.																
<p>Site requirements and development guidelines:</p>	<p>Proposals must retain the Grade II listed cinema building and should consider retaining the public house. Noise and air pollution from the Great North Road must be mitigated. Development needs to take account of the Site of Borough Importance for Nature Conservation to the rear. A site masterplan will be required.</p>																

Site No. 52	Kingmaker House (New Barnet Town Centre)		
Site Address:	15 Station Rd, New Barnet, EN5 1NW		
	Ward:	Oakleigh	
	PTAL 2019:	3	
	PTAL 2031:	4	
	Site Size:	0.26 ha	
	Ownership:	Private	
	Site source:	Existing prior-approval	
	Context type:	Urban	
	Existing or most recent site use/s:	Office	
	Development timeframe:	0-5 years	
	Planning designations:	Town Centre	
Relevant planning applications:	19/5403/FUL (approved) extension for 43 additional residential units; 19/1952/PNO (approved) conversion to 94 residential units.		
	Site description:	Located in New Barnet Town Centre, the site consists of a 7-storey 1960s office building with parking to the front and rear. Similar adjacent buildings have been converted to residential use. The site is close to New Barnet Station.	
	Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, CHW02, ECY01, ECY02, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	90% residential floorspace with 10% commercial (office)	
	Indicative residential capacity:	61	

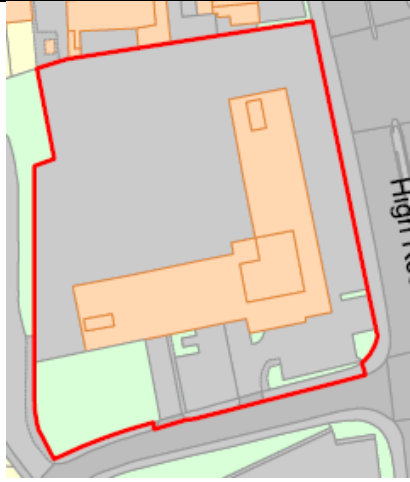


		<p>Justification:</p>	<p>The town centre and well-connected location provides an opportunity to sensitively redevelop this site for residential units.</p>
<p>Site requirements and development guidelines:</p>	<p>While prior approval for conversion from office to residential has been approved, planning applications have been refused on the basis of impact on residential properties to the rear. Proposals must therefore carefully assess the quantum of development and scale and massing of the design. Nevertheless, high public transport access and proximity to town centre functions may support a relatively high density of development. Proposed designs must also take into consideration the Grade II listed New Barnet War Memorial and locally listed East Barnet Town Hall which are opposite the site.</p>		

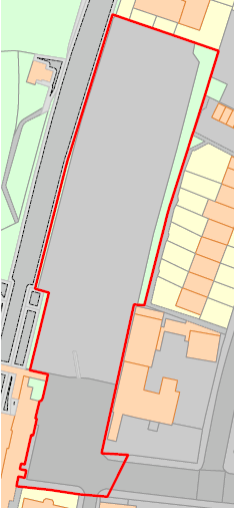


<p>Site No. 53</p>	<p>Allum Way (Whetstone Town Centre)</p>		
<p>Site Address:</p>	<p>Totteridge & Whetstone station/ High Rd/ Downland Close/ Allum Way, Whetstone, N20</p>		
	<p>Ward:</p>	<p>Totteridge</p>	
<p>PTAL 2019:</p>	<p>4</p>		
<p>PTAL 2031:</p>	<p>4</p>		
<p>Site Size:</p>	<p>4.27 ha</p>		
<p>Ownership:</p>	<p>Mixed (TfL and private)</p>		
<p>Site source:</p>	<p>Call for sites</p>		
<p>Context type:</p>	<p>Urban</p>		
<p>Existing or most recent site use/s:</p>	<p>Railway station with car parking, industry and storage</p>		
<p>Development timeframe:</p>	<p>10-15 years</p>		
<p>Planning designations:</p>	<p>None</p>		

	<p>Relevant planning applications:</p>	<p>None</p>	
	<p>Site description:</p>	<p>This site encompasses the station, car parking (101 spaces), storage and small industrial units. Parts of the site are heavily wooded. The north-east is adjacent to Whetstone Town Centre and fronts onto the High Road. The site slopes steeply from the High Road down to the railway line.</p>	
<p>Applicable Draft Local Plan policies:</p>		<p>GSS01, GSS08, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, TOW01, TOW02, CHW01, CHW02, ECY01, ECY02, ECY03, ECC02, ECC05, ECC06, TRC01, TRC02, TRC03</p>	
<p>Proposed uses/ allocation (as a proportion of floorspace):</p>		<p>46% for TfL rail infrastructure, commercial (office and light industry), community and car parking, and 54% residential floorspace</p>	
<p>Indicative residential capacity:</p>		<p>600</p>	
<p>Justification:</p>		<p>The site is highly accessible by public transport and is next to Whetstone Town Centre. There is potential to intensify and deliver housing with some commercial uses. A portion of the site should be safeguarded for new LU rail infrastructure.</p>	



Site requirements and development guidelines:	<p>A portion of the site should be safeguarded for TfL / London Underground for operational purposes, to serve a future Northern Line upgrade. Station functions must be maintained. Good access to public transport and town centre functions support intensification.. Mature trees within the site should be assessed and either preserved or replaced. There is adjoining Green Belt to the west and north and Site of Borough Importance for Nature Conservation along the western site boundary, along with the Dollis Valley Green Walk. A further restricting design factor is the suburban 2-3 storey housing to the east. Building heights must be carefully considered to avoid excessive impact within the area which already has the tall buildings of Barnet House and Northway House. Homes near to the Northern Line must be provided with noise mitigation, with trains running through the night on Friday and Saturday.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required. The detailed drainage strategy should be submitted with the planning application.</p> <p>Access to the site must be managed to form safe entrance and exit, particularly from the High Road and Totteridge Lane. Car parking requirements will be assessed and - provided within the context of a move to sustainable modes of transport.</p>
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Site No. 54	Barnet House (Whetstone Town Centre)		
Site Address:	1255 High Rd, Whetstone, N20 0EJ		
	Ward:	Totteridge	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.59 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Office	
	Development timeframe:	0-5 years	
	Planning designations:	Town Centre; Archaeological Priority Area	



	<p>Relevant planning applications:</p> <p>17/1313/PNO (approved) conversion to 254 residential units; 17/5373/FUL (refused) extension and 216 residential units.</p>																
	<table border="1"> <tr> <td data-bbox="853 687 1003 775">Site description:</td> <td colspan="2" data-bbox="1003 687 2054 775">A 10-storey 1960s office building and associated car parking spaces. The site is within the Whetstone Town Centre and fronts onto the Great North Road. Surrounding buildings vary from 2-6 storeys. The site is within 300m of Totteridge and Whetstone Station.</td> </tr> <tr> <td data-bbox="853 791 1133 863">Applicable Draft Local Plan policies:</td> <td colspan="2" data-bbox="1133 791 2054 863">GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, CHW01, CHW02, ECY01, ECY02, ECY03, TRC01, TRC03</td> </tr> <tr> <td data-bbox="853 879 1227 935">Proposed uses/ allocation (as a proportion of floorspace):</td> <td colspan="2" data-bbox="1227 879 2054 935">90% residential uses with 10% community and commercial</td> </tr> <tr> <td data-bbox="853 951 1227 999">Indicative residential capacity:</td> <td colspan="2" data-bbox="1227 951 2054 999">139</td> </tr> <tr> <td data-bbox="853 1015 1133 1054">Justification:</td> <td colspan="2" data-bbox="1133 1015 2054 1054">The town centre site is accessible and could be used to provide residential uses along with ancillary town centre uses.</td> </tr> </table>		Site description:	A 10-storey 1960s office building and associated car parking spaces. The site is within the Whetstone Town Centre and fronts onto the Great North Road. Surrounding buildings vary from 2-6 storeys. The site is within 300m of Totteridge and Whetstone Station.		Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, CHW01, CHW02, ECY01, ECY02, ECY03, TRC01, TRC03		Proposed uses/ allocation (as a proportion of floorspace):	90% residential uses with 10% community and commercial		Indicative residential capacity:	139		Justification:	The town centre site is accessible and could be used to provide residential uses along with ancillary town centre uses.	
Site description:	A 10-storey 1960s office building and associated car parking spaces. The site is within the Whetstone Town Centre and fronts onto the Great North Road. Surrounding buildings vary from 2-6 storeys. The site is within 300m of Totteridge and Whetstone Station.																
Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, CHW01, CHW02, ECY01, ECY02, ECY03, TRC01, TRC03																
Proposed uses/ allocation (as a proportion of floorspace):	90% residential uses with 10% community and commercial																
Indicative residential capacity:	139																
Justification:	The town centre site is accessible and could be used to provide residential uses along with ancillary town centre uses.																
<p>Site requirements and development guidelines:</p>	<p>While prior approval (17/1313/PNO) has been granted for office to residential conversion, planning applications which come forward should include community and commercial office uses. The good public transport access and town centre location support a relatively intensive development. High quality design will be expected to reflect the context of Whetstone High Street and the prominent location of the site. The site is within an Archaeological Priority Area and must be subject to an archaeological assessment.</p>																


Site No. 55	Woodside Park Station East (Existing Transport Infrastructure)			
Site Address:	Woodside Park Rd, Woodside Park, N12 8RT			
	Ward:	Totteridge		
	PTAL 2019:	3		
	PTAL 2031:	4		
	Site Size:	0.46 ha		
	Ownership:	Public (TfL)		
	Site source:	Call for sites		
	Context type:	Urban		
	Existing or most recent site use/s:	Car park		
	Development timeframe:	0-5 years		
	Planning designations:	None		
Relevant planning applications:	None			
	Site description:	A commuter car park (148 spaces) serving Woodside Park Station, which is locally listed. Surrounded on other sides by low-rise housing and a small private school.		
	Applicable Draft Local Plan policies:	GSS01, GSS09, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CHW02, ECC02, TRC01, TRC03		
	Proposed uses/ allocation (as a proportion of floorspace):	Residential with 20% re-provision of car parking.		
	Indicative residential capacity:	95		
	Justification:	The surface car park in this accessible and residential area offers potential for intensification for housing.		
				

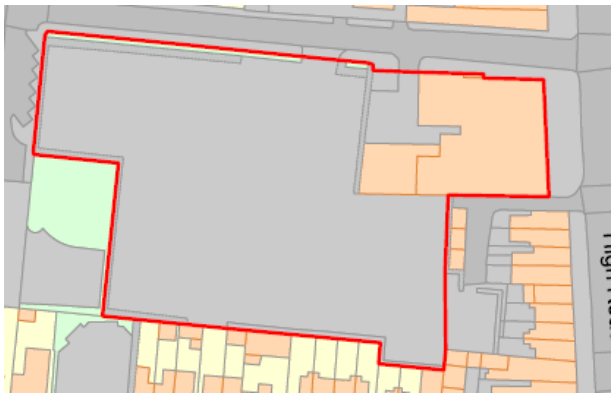
Site requirements and development guidelines:	<p>Proposed designs must avoid privacy issues with neighbouring housing and be suitable for the context of the locally listed station building and surrounding housing. The adjacent railway line operates through the night on Friday and Saturday and the effects of noise disturbance must be mitigated. Restrictions on free parking at the entrance to Woodside Grange Road should be retained - where parking is at present prohibited from 2 to 3 pm Monday-Friday – to prevent all-day commuter parking in this small area and maintain safe access for the adjoining school and others.</p> <p>Public car parking requirements should be assessed, and mitigation provided to encourage the use of public transport and active modes.</p>
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Site No. 56	Woodside Park Station West (Existing Transport Infrastructure)		
Site Address:	Station Approach, Woodside Park, N12 8RT		
	Ward:	Totteridge	
	PTAL 2019:	3	
	PTAL 2031:	4	
	Site Size:	1.37 ha	
	Ownership:	Public (TfL)	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Undeveloped land adjacent to railway corridor	
	Development timeframe:	0-5 years (southern part; 6-10 years (northern part)	
	Planning designations:	None	
Relevant planning applications:	19/1809/FUL (refused) 86 flats; 19/4293/FUL (approved) 86 flats.		
	Site description:	The site is a corridor of undeveloped land next to the Northern Line railway and Woodside Park Station which is overgrown and partially wooded. To the west are a mix of houses and residential blocks of up to four storeys.	
	Applicable Draft Local Plan policies:	GSS01, GSS09, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH07, CHW02, ECC02, ECC06, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	Residential	




	Indicative residential capacity:	356
	Justification:	The unused areas of land in this accessible and residential area offers potential for intensification for housing.
Site requirements and development guidelines:	<p>Design considerations must avoid privacy issues with neighbouring housing and mitigate noise impact from the adjacent railway line. The location and elongated shape of the site may pose issues with access. The impact of the loss of trees and other vegetation must be mitigated. The council has granted planning permission for the redevelopment of the southern part of the site (ref: 19/4293/FUL). Land to the north of Station Approach is a longer- term development opportunity, dependant on provision of satisfactory access for pedestrians, cyclists and vehicles. This may require significant redesign of one of the station entrances to the western side of the bridge link at the station. Access is narrow and relatively isolated and dark at night, raising issues of security that must be considered and addressed through drawing on the principles of 'Secured by Design'. Noise mitigation must be provided with regards to the adjacent Northern Line which runs through the night on Friday and Saturday.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required. The detailed drainage strategy should be submitted with the planning application.</p>	

Site No. 57	309-319 Ballards Lane (North Finchley Town Centre)		
Site Address:	309-319 Ballards Lane, North Finchley, N12 8LY		
	Ward:	West Finchley	
	PTAL 2019:	3	
	PTAL 2031:	4	
	Site Size:	0.40 ha	
	Ownership:	Private	
	Site source:	North Finchley SPD	
	Context type:	Central	
	Existing or most recent site use/s:	Retail and office	
	Development timeframe:	6-10 years	
	Planning designations:	Town Centre	
Relevant planning applications:	None		
			

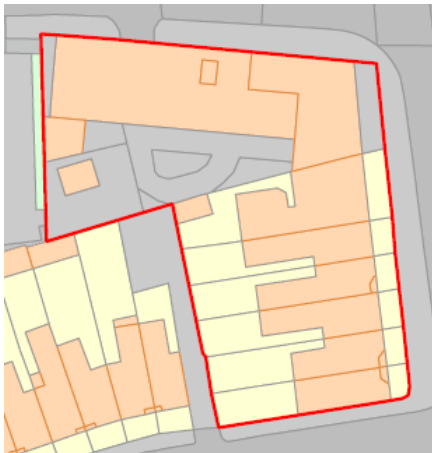
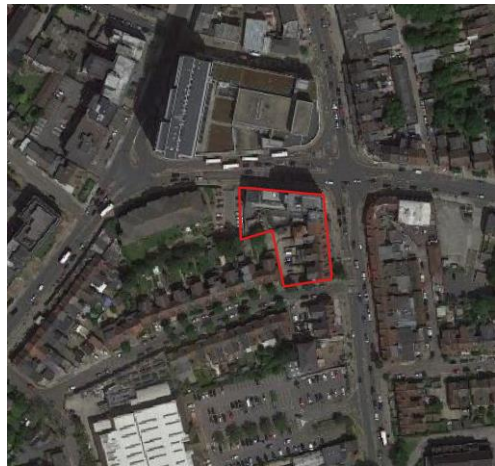
	Site description: The site is within North Finchley Town Centre and fronts onto Ballards Lane. The 4-5 storey buildings are set back from the highway boundary with car parking to the front and rear and are largely in office use. Opposite is the Tally Ho Triangle site, which includes the Arts Depot and to 11 storey residential building. The West Finchley and Woodside Park stations are within 1km.
	Applicable Draft Local Plan policies: GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY02, ECY03, ECC02, TRC01, TRC03
	Proposed uses/ allocation (as a proportion of floorspace): 80% residential floorspace with 20% commercial and community uses
	Indicative residential capacity: 130
	Justification: This accessible town centre site was identified for intensification in the North Finchley SPD
Site requirements and development guidelines: Proposals should include town centre uses of retail, office and community, with residential above. The accessible location and surrounding townscape underpin a relatively high density of redevelopment, while being sensitive to the adjacent United Services Club and Finchley War Memorial, as well as the low-rise residential properties to the rear. Refer to the North Finchley SPD for further guidance. Proposals must take into consideration that that a critical Thames Water trunk sewer runs through or close to this site.	


Site No. 58	811 High Rd & Lodge Lane car park (North Finchley Town Centre)	
Site Address:	811 High Rd & Lodge Lane, North Finchley, N12 8JT	
	Ward:	West Finchley
	PTAL 2019:	4
	PTAL 2031:	4
	Site Size:	0.73 ha
	Ownership:	Mixed Council and private
	Site source:	North Finchley SPD
	Context type:	Urban
	Existing or most recent site use/s:	Public car park retail and office
	Development timeframe:	0-5 years
	Planning designations:	Town Centre

	<p>Relevant planning applications:</p>	<p>None</p>	
	<p>Site description:</p>	<p>The site is within North Finchley Town Centre and includes a Primary Shopping Frontage. To the front is a 3-storey 1960s building with retail and office use, while to the rear is a large Council-owned public car park (232 spaces). Surrounding 2-3 storey high street buildings include town centre uses. Beyond the rear of the site is a primary school with outdoor sports areas and 2-3 storey housing, including the locally listed 45-53 Lodge Lane terrace. Woodside Park Station is within 600m.</p>	
<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS08, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY02, ECY03, ECC02, TRC01, TRC03</p>		
<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>70% residential floorspace with 30% commercial town centre uses and replacement public car parking</p>		
<p>Indicative residential capacity:</p>	<p>132</p>		
<p>Justification:</p>	<p>This accessible town centre site was identified for intensification in the North Finchley SPD</p>		
<p>Site requirements and development guidelines:</p>	<p>Proposals should include town centre uses such as retail and office, with residential above. The accessible location and surrounding townscape can underpin a relatively high density of redevelopment, although proposals must be sensitive to the context. Public car parking loss must be assessed and re-provided as required. Further guidance is provided by the North Finchley Town Centre SPD.</p>		




Site No. 59	Central House (Finchley Central Town Centre)			
Site Address:	1 Ballards Lane, Finchley N3 1UX			
	Ward:	West Finchley		
	PTAL 2019:	5		
	PTAL 2031:	6		
	Site Size:	0.15 ha		
	Ownership:	Private		
	Site source:	Call for sites, Finchley Church End Town Centre Strategy		
	Context type:	Central		
	Existing or most recent site use/s:	Retail and office		
Development timeframe:	0-5 years			
Planning designations:	Town Centre; Archaeological Priority Area			
Relevant planning applications:	16/3722/PNO (approved) conversion to 42 flats.			
	Site description:	The site is a nine-storey office building within Finchley Central Town Centre with a Primary Frontage along Ballard's Lane. Surrounding buildings are largely retail and office and not more than 3-storeys. The site is close to Finchley Central Station.		
	Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, EGY01, EGY02, EGY03, ECC02, TRC01, TRC03		
	Proposed uses/ allocation (as a proportion of floorspace):	80% residential with 20% commercial uses floorspace.		
	Indicative residential capacity:	48		
	Justification:	This highly accessible town centre location is identified in the Finchley Church End and Town Centre Strategy		
				

Site requirements and development guidelines:	High public transport accessibility and access to town centre services support a relatively high density of development. An attractive, active frontage with town centre uses should be provided on the ground floor. Prior approval (16/3722/PNO) was granted for 48 units. The site is within an Archaeological Priority Area and proposals must be subject to an archaeological assessment. For further information refer to the Finchley Church End Town Centre Strategy.
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Site No. 60	Finchley House (key site 3) (North Finchley Town Centre)		
Site Address:	High Road & Kingsway North Finchley N12 0BT		
	Ward:	West Finchley	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.62 ha	
	Ownership:	Private	
	Site source:	North Finchley SPD	
	Context type:	Central	
	Existing or most recent site use/s:	Offices and residential	
	Development timeframe:	0-5 years	
	Planning designations:	Town Centre	
Relevant planning applications:	17/6746/PNO (approved) conversion to 63 residential units; 18/0782/FUL (2 storey extension for 9 residential units)		
	Site description:	A corner site within North Finchley Town Centre. A 9-storey 1970s office building fronts onto the Kingsway, while the frontage onto the Great North Road is a terrace of Victorian 2-storey buildings in office and residential use. The Tally Ho Triangle is opposite, which includes the Arts Depot and 11-storey residential. To the rear is 2-3 storey housing. West Finchley and Woodside Park Stations are within 1km.	
	Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECV01, ECV02, ECV03, ECC02, TRC01, TRC03	
			


	Proposed uses/ allocation (as a proportion of floorspace):	80% residential floorspace with 20% community and community use floorspace
	Indicative residential capacity:	202
	Justification:	This accessible town centre site was identified for intensification in the North Finchley SPD
Site requirements and development guidelines:	Proposals should include town centre uses of retail, office and community, with residential above. The ground floor frontage should accommodate active town centre uses and be designed to create a pedestrian-friendly environment. The high accessibility to public transport and local services would support a relatively high density of redevelopment. Design must be sensitive to surrounding low-rise residential properties. For further guidance refer to the North Finchley SPD.	

Site No. 61	Tally Ho Triangle (key site 1) (North Finchley Town Centre)		
Site Address:	High Rd, Ballard's Lane & Kingsway, North Finchley, N12 0GA/ OGP		
	Ward:	West Finchley	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.99 ha	
	Ownership:	mixed Council/ private	
	Site source:	North Finchley SPD	
	Context type:	Central	
	Existing or most recent site use/s:	Retail, office, arts centre, bus station, public car parking, residential and community facilities	
	Development timeframe:	6-10 years	




	<p>Planning designations: Town Centre</p>		
<p>Relevant planning applications: None</p>			
	<p>Site description:</p>	<p>The site is within North Finchley Town Centre. Nether Street splits the site, with the northern segment mostly in retail and office use within buildings of 3-4 storeys. The southern segment includes an arts centre, bus station, public car parking, and office and retail uses, with building heights from 3/4 storeys to a tower of 11 storeys of residential. The site is surrounded by main roads and town centre uses. Adjacent to the north is the locally listed Tally Ho public house. The West Finchley and Woodside Park Stations are within 1km.</p>	
<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY02, ECY03, ECC02, TRC01, TRC03</p>		
<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>70% residential floorspace with 30% commercial (office and retail), community leisure, transport and public car parking</p>		
<p>Indicative residential capacity:</p>	<p>281</p>		
<p>Justification:</p>	<p>This accessible town centre site was identified for intensification in the North Finchley SPD</p>		

Site requirements and development guidelines:	<p>The accessible location and townscape context support a high density of redevelopment. Town centre uses must be retained with ground floor frontages accommodating active uses. The northern segment of the site could increase its offering of uses such as cafes, restaurants and retail at ground level, with employment and residential above. Taller buildings should be focused on the southern part of the site. Public car parking requirements must be assessed, and mitigation provided to encourage the use of public transport and active transport modes. For further guidance refer to the North Finchley Town Centre SPD.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required. The detailed drainage strategy should be submitted with the planning application.</p>
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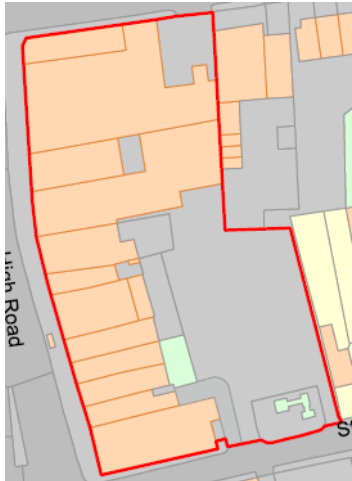


Site No. 62	Tesco Finchley (Finchley Central Town Centre)		
Site Address:	21-29 Ballard's Lane, Finchley, N3 1XP		
	Ward:	West Finchley	
	PTAL 2019:	4	
	PTAL 2031:	5	
	Site Size:	0.85 ha	
	Ownership:	Private	
	Site source:	Finchley Church End Town Centre Strategy	
	Context type:	Urban	
	Existing or most recent site use/s:	Supermarket with associated car parking and office uses	
	Development timeframe:	0-5 years	
	Planning designations:	Town Centre; Archaeological Priority Area	
Relevant planning applications:	None		
			
	Site description:	<p>A modern 3-storey building with a large supermarket on the ground floor and offices on the upper floors, with associated car parking to the rear. The street separating the main building from the car park is within the curtilage. The site is within Finchley Central Town Centre and has a Primary Frontage along Ballard's Lane. Surrounding buildings are largely retail and office and not more than 3-storeys. The site is close to Finchley Central Station.</p>	

	Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY02, ECY03, ECC02, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	75% residential floorspace with 25% commercial town centre uses and car parking	
	Indicative residential capacity:	170	
	Justification:	The town centre location is highly accessible by public transport and can be intensified to deliver town centre and residential uses.	
Site requirements and development guidelines:	<p>High accessibility to public transport and local services, and the tall buildings location, mean this site should support a relatively high density of development, while being mindful of the surrounding context, including low-rise residential properties to the north. An attractive, active frontage with town centre uses should be provided on the ground floor. Car parking requirements should be assessed, and mitigation provided to encourage the use of public transport and active transport modes. The site is within an Archaeological Priority Area and must be subject to an archaeological assessment. For further information refer to the Finchley Church End Town Centre Strategy.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required. The detailed drainage strategy should be submitted with the planning application.</p>		



Site No. 63	Philex House (Major Thoroughfare)		
Site Address:	110-124 West Hendon Broadway, West Hendon, NW9 7DW		
	Ward:	West Hendon	
	PTAL 2019:	3	
	PTAL 2031:	3	
	Site Size:	0.28 ha	
	Ownership:	Private	
	Site source:	Unimplemented 2006 UDP proposal	
	Context type:	Urban	


	<table border="1"> <tr> <td>Existing or most recent site use/s:</td> <td>Office</td> </tr> <tr> <td>Development timeframe:</td> <td>0-5 years</td> </tr> <tr> <td>Planning designations:</td> <td>None</td> </tr> <tr> <td>Relevant planning applications:</td> <td>16/3265/PNO (approved) conversion to 22 residential units.</td> </tr> </table>	Existing or most recent site use/s:	Office	Development timeframe:	0-5 years	Planning designations:	None	Relevant planning applications:	16/3265/PNO (approved) conversion to 22 residential units.								
Existing or most recent site use/s:	Office																
Development timeframe:	0-5 years																
Planning designations:	None																
Relevant planning applications:	16/3265/PNO (approved) conversion to 22 residential units.																
	<table border="1"> <tr> <td>Site description:</td> <td colspan="2">A disused office building on West Hendon Broadway/ A5. The building is set back and elevated from the street, with a driveway/ parking surrounding the building. The 3-storey building is of a Modernist style, however, it is not listed. A mobile phone mast is on the roof. The site backs onto the Midland Railway, with the M1 immediately beyond. To the south are light industrial uses, with terraced housing to the north. Opposite are light industrial units and new residential blocks. Numerous bus routes run along the A5.</td> </tr> <tr> <td>Applicable Draft Local Plan policies:</td> <td colspan="2">GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, CHW01, CHW02, ECC02, TRC01, TRC03</td> </tr> <tr> <td>Proposed uses/ allocation (as a proportion of floorspace):</td> <td colspan="2">Residential</td> </tr> <tr> <td>Indicative residential capacity:</td> <td colspan="2">48</td> </tr> <tr> <td>Justification:</td> <td colspan="2">The derelict site can be brought back into use and intensified to deliver housing.</td> </tr> </table>		Site description:	A disused office building on West Hendon Broadway/ A5. The building is set back and elevated from the street, with a driveway/ parking surrounding the building. The 3-storey building is of a Modernist style, however, it is not listed. A mobile phone mast is on the roof. The site backs onto the Midland Railway, with the M1 immediately beyond. To the south are light industrial uses, with terraced housing to the north. Opposite are light industrial units and new residential blocks. Numerous bus routes run along the A5.		Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, CHW01, CHW02, ECC02, TRC01, TRC03		Proposed uses/ allocation (as a proportion of floorspace):	Residential		Indicative residential capacity:	48		Justification:	The derelict site can be brought back into use and intensified to deliver housing.	
Site description:	A disused office building on West Hendon Broadway/ A5. The building is set back and elevated from the street, with a driveway/ parking surrounding the building. The 3-storey building is of a Modernist style, however, it is not listed. A mobile phone mast is on the roof. The site backs onto the Midland Railway, with the M1 immediately beyond. To the south are light industrial uses, with terraced housing to the north. Opposite are light industrial units and new residential blocks. Numerous bus routes run along the A5.																
Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, CHW01, CHW02, ECC02, TRC01, TRC03																
Proposed uses/ allocation (as a proportion of floorspace):	Residential																
Indicative residential capacity:	48																
Justification:	The derelict site can be brought back into use and intensified to deliver housing.																
<p>Site requirements and development guidelines:</p>	<p>The site is suitable for residential redevelopment. Under 16/3265/PNO prior approval was granted for 22 units. Proposals must mitigate the air pollution and noise from surrounding major roads and railway. Preferably the current building with its architectural features should be preserved, with new development of a consistent style. The site lies on the possible route of Watling Street, a Roman Road, and should be subject to an archaeological assessment.</p>																



Site No. 64	744-776 High Rd (North Finchley Town Centre)
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Site Address:		744-776 High Rd, North Finchley, N12 9QG		
	Ward:	Woodhouse		
	PTAL 2019:	4		
	PTAL 2031:	4		
	Site Size:	0.54 ha		
	Ownership:	Mixed Council and private		
	Site source:	North Finchley SPD		
	Context type:	Central		
	Existing or most recent site use/s:	Retail, restaurants, residential and public car park		
	Development timeframe:	6-10 years		
	Planning designations:	Town Centre		
Relevant planning applications:	None			
		Site description:	The site is central to North Finchley Town Centre and includes Primary Shopping Frontage. The buildings are mostly 3-storeys ranging in age and style from late Victorian to 1950s. A small public car park is at the rear of the site. The context is of largely similar town centre uses and building types. To the rear of the site is a mix of office uses and 2-3 storey housing. Woodside Park Station is within approximately 800m.	
		Applicable Draft Local Plan policies:	GSS01, GSS08, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY02, ECY03, ECC02, TRC01, TRC03	
		Proposed uses/ allocation (as a proportion of floorspace):	80% residential floorspace with 20% commercial town centre uses	
		Indicative residential capacity:	175	
		Justification:	This accessible town centre site was identified for intensification in the North Finchley SPD	

Site requirements and development guidelines:	Proposals should include active ground floor frontages with town centre commercial uses, with residential above. The accessible location and surrounding townscape underpin a relatively high density of redevelopment, while proposals must be sensitive to the context of adjacent town centre buildings and residential properties. The redeveloped buildings should match the height of those retained along the High Road, with the potential for upper level residential development to be stepped back from the frontage with total building height not exceeding six storeys. Development should respond to the sensitive edges on the eastern part of the site, where heights should not exceed three storeys. The loss of public car parking must be assessed, and mitigation provided to encourage the use of public transport and active transport modes as required. For further guidance refer to the North Finchley SPD.
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Site No. 65	Barnet Mortuary (former) (Major Thoroughfare)		
Site Address:	Dolman Close Finchley N3 2EU		
	Ward:	West Finchley	
	PTAL 2019:	1B	
	PTAL 2031:	1B	
	Site Size:	0.25 ha	
	Ownership:	Council	
	Site source:	Council assets disposal programme	
	Context type:	Urban	
	Existing or most recent site use/s:	Storage	
	Development timeframe:	0-5 years	
	Planning designations:	None	
Relevant planning applications:	None		
	Site description:	A disused mortuary and grounds which is adjacent to the North Circular Road. To the north and west are low-rise semi-detached and terraced residences, while to the east are the grounds of Tudor Primary School.	
	Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CHW02, ECC06, TRC01, TRC03	
			

	Proposed uses/ allocation (as a proportion of floorspace):		Residential
	Indicative residential capacity:		20
	Justification:	The disused site lies in a residential area and can be redeveloped and intensified for residential uses.	
Site requirements and development guidelines:	Development must take into consideration the effect of noise and air pollution from the adjacent North Circular Road. Building height needs to be compatible with adjoining residential development. Development should meet the requirements of GSS11 Major Thoroughfares.		

Site No. 66	East Wing (key site 4) (North Finchley Town Centre)		
Site Address:	672-708 High Rd North Finchley N12 9PT/ 9QL		
	Ward:	Woodhouse	
	PTAL 2019:	3	
	PTAL 2031:	4	
	Site Size:	0.44 ha	
	Ownership:	Private	
	Site source:	North Finchley SPD	
	Context type:	Central	
	Existing or most recent site use/s:	Retail, office and residential	
	Development timeframe:	6-10 years	
	Planning designations:	Town Centre Local listing	
Relevant planning applications:	15/06414/FUL (approved) conversion to 21 flats		
			

	Site description:	The site is within the North Finchley Town Centre and includes Primary Shopping Frontage. The buildings are mostly 3-storeys ranging from late Victorian to 1960s, with retail and office uses on ground floor and residential above. Opposite is the Tally Ho Triangle site, which includes the Arts Depot and 11-storey residential building. Office uses and 2-3 storey housing adjoin to the rear. West Finchley and Woodside Park stations are within 1km.	
	Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, TOW03, TOW04, CHW01, CHW02, ECY01, ECY02, ECY03, ECC02, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	70% residential floorspace with 30% town centre commercial and cultural uses	
	Indicative residential capacity:	125	
	Justification:	This accessible town centre site was identified for intensification in the North Finchley SPD.	
Site requirements and development guidelines:	Proposals should include an active ground floor frontage with town centre commercial uses such as retail and office space, with residential above. The accessible location and town centre context underpin a relatively high density. The curved Sea Rock facade at the junction of the High Road and Woodhouse Road is on the Local List and should be retained as a local landmark. Development should be sensitive to and consistent with the existing and retained buildings, with height on the High Road matching the height of the retained buildings as a guide. Where floors above this level are added, these need to be set back from the building line. Heights of up to six storeys may be appropriate in the south-eastern corner of the site, if set back from the existing High Road building line. For further guidance refer to the North Finchley Town Centre SPD. Proposals must take into consideration that that a critical Thames Water trunk sewer runs through or close to this site.		

Site No. 67	Great North Leisure Park (Major Thoroughfare)		
Site Address:	High Rd, Friern Barnet, N12 0GL		
	Ward:	Woodhouse	
	PTAL 2019:	1B	
	PTAL 2031:	2	
	Site Size:	3.45 ha	
	Ownership:	Mixed	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Cinema, bowling, leisure/ sports centre with lido, restaurants and extensive car parking	

	<table border="1"> <tr> <td>Development timeframe:</td> <td>6-10 years</td> </tr> <tr> <td>Planning designations:</td> <td>None</td> </tr> <tr> <td>Relevant planning applications:</td> <td>None</td> </tr> </table>	Development timeframe:	6-10 years	Planning designations:	None	Relevant planning applications:	None										
Development timeframe:	6-10 years																
Planning designations:	None																
Relevant planning applications:	None																
	<table border="1"> <tr> <td>Site description:</td> <td colspan="2">This is an out-of-town-centre, car-centric leisure park. This site includes a cinema, bowling alley and ancillary restaurants with extensive car parking, as well as Finchley Lido Leisure Centre. It is close to a major junction of the Great North Road and North Circular Road (A406) and is adjacent to Metropolitan Open Land, a Local Nature Reserve and Site of Importance for Nature Conservation.</td> </tr> <tr> <td>Applicable Draft Local Plan policies:</td> <td colspan="2">GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CHW01 CHW02, ECC05, ECC06, TRC01, TRC03</td> </tr> <tr> <td>Proposed uses/ allocation (as a proportion of floorspace):</td> <td colspan="2">60% residential floorspace with 40% commercial, leisure and community uses</td> </tr> <tr> <td>Indicative residential capacity:</td> <td colspan="2">352</td> </tr> <tr> <td>Justification:</td> <td colspan="2">The low density nature of the existing site, including large areas of surface parking, provide an opportunity for intensification that includes residential as well as existing leisure uses.</td> </tr> </table>		Site description:	This is an out-of-town-centre, car-centric leisure park. This site includes a cinema, bowling alley and ancillary restaurants with extensive car parking, as well as Finchley Lido Leisure Centre. It is close to a major junction of the Great North Road and North Circular Road (A406) and is adjacent to Metropolitan Open Land, a Local Nature Reserve and Site of Importance for Nature Conservation.		Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CHW01 CHW02, ECC05, ECC06, TRC01, TRC03		Proposed uses/ allocation (as a proportion of floorspace):	60% residential floorspace with 40% commercial, leisure and community uses		Indicative residential capacity:	352		Justification:	The low density nature of the existing site, including large areas of surface parking, provide an opportunity for intensification that includes residential as well as existing leisure uses.	
Site description:	This is an out-of-town-centre, car-centric leisure park. This site includes a cinema, bowling alley and ancillary restaurants with extensive car parking, as well as Finchley Lido Leisure Centre. It is close to a major junction of the Great North Road and North Circular Road (A406) and is adjacent to Metropolitan Open Land, a Local Nature Reserve and Site of Importance for Nature Conservation.																
Applicable Draft Local Plan policies:	GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CHW01 CHW02, ECC05, ECC06, TRC01, TRC03																
Proposed uses/ allocation (as a proportion of floorspace):	60% residential floorspace with 40% commercial, leisure and community uses																
Indicative residential capacity:	352																
Justification:	The low density nature of the existing site, including large areas of surface parking, provide an opportunity for intensification that includes residential as well as existing leisure uses.																
<p>Site requirements and development guidelines:</p>	<p>There is potential for comprehensive or infill residential development utilising space released by existing surface car parking, allowing better integration into the surrounding residential environment for more efficient and sustainable use of space. There should be no additional floorspace of leisure and commercial floorspace in use for restaurants and cafes and sui generis take away uses, which should be located in town centres. Proposals must reflect the context of a major thoroughfare and respond to the adjacent MOL. Further masterplanning will be required in the event of comprehensive redevelopment. Due to the low PTAL, proposals should include measures that contribute towards modal shift away from private car use to more sustainable means of transport.</p>																

References

- ¹ ONS mid-2018 population estimate
- ² 2011 Census – Method of travel to work (local authorities England and Wales)
- ³ 2011 Census
- ⁴ West London SHMA
- ⁵ Annual Regeneration Report 2018/19
- ⁶ Barnet's Employment Land Review
- ⁷ This SPD will replace two existing SPDs on Residential Design Guidance and Sustainable Design and Construction
- ⁸ Planning permission will no longer be required to move between retail, professional services, restaurants/cafes, offices (including research and development facilities and light industrial uses), clinics, health centres, creches, day nurseries, day centres, gyms, and most indoor recreation facilities. Previously these were all separate use classes but now all fall within the new Class E.
- ⁹ Better homes for local people, Mayor of London, 2018
- ¹⁰ <https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-educational-provision/guidance-for-schools-colleges-and-local-authorities-on-maintaining-educational-provision>
- ¹¹ <https://www.barnet.gov.uk/planning-and-building/planning-policies/local-plan-review/authorities-monitoring-report>
- ¹² London Plan Table 3.1 – Minimum space standards for new dwellings
- ¹³ Barnet's Employment Land Survey highlights the number of microbusinesses operating from residential premises
- ¹⁴ <https://www.barnet.gov.uk/planning-and-building/planning-policies-and-local-plan/employment-use-residential-use-article-4>
- ¹⁵ Barnet SHMA 2018 – Figure 35
- ¹⁶ Barnet SHMA 2018 Figure 36
- ¹⁷ Barnet Residential Conversions Study 2019
- ¹⁸ London Plan Table 3.1 – Minimum space standards for new dwellings
- ¹⁹ House of Commons, Communities and Local Government Committee -Housing for older People – 2nd Report, February 2018

²⁰ Barnet SHMA 2018 Figure 44

²¹ As at November 2019 there were 80 entries on Barnet's Self-Build Register. This compares with an Objectively Assessed Need of 3,060 new homes per annum.

²² "Dirty" storage should be secure, sheltered and adequately lit with convenient access to the street. Further guidance is set out in the Residential Design Guidance SPD section 11.5.

²³ The Agent of Change principle (London Plan Policy D13) aims to protect the existing uses and prevent impacts on business operations in planning terms

²⁴ A major residential proposal involves 10 or more residential units

²⁵ This SPD will replace two existing SPDs on Residential Design Guidance and Sustainable Design and Construction

²⁶ Historic England Advice Note 4 - 2015

²⁷ Subject to production of joint area planning framework with LB Enfield, LB Haringey and Mayor of London

²⁸ Subject to the enactment of the environment bill

²⁹ Records for heritage assets are collated and presented in the Historic Environment Records. The Council will update evidence on the Borough's historic environment to aid understanding, and appropriate promotion and protection

³⁰ Applications to demolish a listed building in whole or in part will be notified to the National Amenity Societies in accordance with the Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2015)

³¹ Planning Practice Guidance ID-53-006-20170728

³² Barnet Hot Food Takeaways Review 2018

³³ Barnet Shisha Bars Report 2016

³⁴ This should be at least two units which are neither a hot food takeaway use nor a Sui Generis use as specified in (b).

³⁵ Chipping Barnet, Cricklewood, North Finchley and Whetstone are identified in the London Plan as town centres where the night time economy is of more than local significance.

³⁶ Cemetery Research Group – An audit of London Burial Provision, March 2011.

³⁷ <https://www.barnet.gov.uk/planning-and-building/planning-policies-and-local-plan/employment-use-residential-use-article-4>

³⁸ An employment led development is one where the employment generating (as defined by ECY01) floorspace is greater in proportion to the other uses proposed on the site,

³⁹ Valuation Office Agency Statistical Release 8 December 2016: Non-domestic rating: Business Floorspace England and Wales: Table FS3.3: Office sector - total floorspace¹, by administrative area, data to 31 March 2016.

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- ⁴⁰ <https://www.barnet.gov.uk/planning-and-building/planning-policies-and-local-plan/employment-use-residential-use-article-4>
- ⁴¹ a use that is solely employment generating use for the equivalent of 2FTE and does not invoke the Agent of Change Principle.
- ⁴² Barnet 2024- Corporate Plan 2019 -2024
- ⁴³ London Plan Figure 9.3
- ⁴⁴ The Energy Hierarchy is set out in London Plan Policy 5.2 Minimising Carbon Dioxide Emissions.
- ⁴⁵ BRE Housing Stock Model Update for Barnet 2009
- ⁴⁶ [GLA London Building Stock Model](#)
- ⁴⁷ [London Energy and Greenhouse Gas Inventory \(LEGGI\) - London Datastore](#) (2018 data most recent at time of writing).
- ⁴⁸ https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf
- ⁴⁹ [Air quality appraisal: damage cost guidance - GOV.UK \(www.gov.uk\)](#)
- ⁵⁰ Environmental Permitting is required for uses which could have an impact on the environment and human health. For example certain manufacturing or waste activities or uses which discharge into a river or underground water supply. Depending on the operation either the Environment Agency or Local authority provide the regulation. More guidance is available here: <https://www.gov.uk/topic/environmental-management/environmental-permits> and the legislation is available here: <http://www.legislation.gov.uk/ukxi/2010/675/contents/made>
- ⁵¹ Annual Exceedance Probability
- ⁵² Risk of Flooding from Surface Water
- ⁵³ Residential development over 200 units or a site of 4 hectares or more. Non residential development over 10,000 m2
- ⁵⁴ Inappropriate development can be defined using Table 2 in the Technical guidance to the National Planning Policy Framework which sets out the flood risk vulnerability classification for various types of land uses
- ⁵⁵ Table 1 in the Technical guidance to the National Planning Policy Framework sets out the Flood Zones and the appropriate uses (also see table 2) for those zones. The Environment Agency Flood Map identifies the flood zones <http://www.environment-agency.gov.uk/homeandleisure/floods/default.aspx>
- ⁵⁶ The Surface Water Management Plan for Barnet also needs to be considered and it identifies areas more prone to surface water flooding. It will be informed by the Preliminary Flood Risk Assessment <http://publications.environment-agency.gov.uk/PDF/FLHO1211BVNP-E-E.pdf>
- ⁵⁷ All potential surface water flooding should be considered and Critical Drainage Areas (CDA) are particular areas of concern for surface water flooding. Barnet Surface Water Management Plan identifies CDA.
- ⁵⁹ Excluding and allowance of 5 litres or less per head per day for external water use (as set out in the 'optional' Requirement G2 of Schedule 1 to the Building Regulations 2010).

⁶⁰ <http://www.londongardensonline.org.uk/>

⁶¹ <https://www.barnetalotments.org.uk/apply/>

⁶² *The Climate Change Adaption Manual 2nd Edition (Natural England and the RSBP 2020*

⁶³ [Green infrastructure maps and tools | London City Hall](#)

⁶⁴ https://greenerjourneys.com/wp-content/uploads/2016/06/TTBusReport_Digital.pdf

⁶⁵ Mayor's Transport Strategy, GLA 2018

⁶⁶ Sustainable Transport Strategy – London Strategy, Journeys originating in Barnet – modes of transport 14/15-16/17

⁶⁷ <http://content.tfl.gov.uk/ulez-boundary-map-from-25-october-2021.pdf>

⁶⁸ Department of Transport – Road Casualties by Severity - London Datastore

⁶⁹ London Plan – Table 10.2 – Minimum cycle parking standards

⁷⁰ London Plan – Figure 10.2 – Area where higher minimum cycle parking standards apply

⁷¹ London Plan - Figure 9.5 – Broadband speed 2016

⁷² The government set out in the Planning White Paper in summer 2020 that it intended to reform s106 and the Community Infrastructure Levy. The 2021 Queen Speech included reference to a new Planning Bill which includes “Replacing the existing systems for funding affordable housing and infrastructure from development with a new more predictable and more transparent levy”. At the time of writing, there is limited information available about how the new levy will work in practice and when it would be introduced.

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APPENDIX B

Local Plan Regulation 18 Town and Country Planning (Local Planning) (England) Regulations

Schedule of Representations and Responses

June 2021

Glossary of abbreviations

BXC	Brent Cross Cricklewood
BPOSS	Barnet Parks and Open Spaces Strategy
CCG	Clinical Commissioning Group
EQIA	Equalities Impact Assessment
FORAB	Federation of Resident Associations (Barnet)
GLA	Greater London Authority
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
JSNA	Joint Strategic Needs Assessment
LB	London Borough
LPA	Local Planning Authority
LTTS	Long Term Transport Strategy
MHCLG	Ministry of Housing, Communities and Local Government
MHNF	Mill Hill Neighbourhood Forum
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
Reg 19	Regulation 19 of the 2012 Local Planning Regulations
The Regulations	The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
SA	Sustainability Appraisal
SHMA	Strategic Housing Market Assessment
SoS	Secretary of State for Housing, Communities and Local Government
STA	Strategic Transport Assessment
WLO	West London Orbital

Representor	Section	Summary of Comments	Council's Response	Revised Plan?
CCI London Community Church	Chapter 1	Who decides what is in the best interest for the local area? – who writes the Development Plan? 1.2.2 – no allowances are made for places which are good for the community, meeting places. 1.3.1 – Development needs – refers to what? General development of infrastructures or housing? 1.4.3 – what is considered an adverse effect with regards to sustainability? 1.4.4 – For example: - if the 'community centre' / structure is already in place and integrated, what happens then?	The Council's Local Plan is the product of extensive engagement and evidence gathering process. Reference now made to policies to support social and community infrastructure. Development needs can refer to new homes, employment space, retail, transport infrastructure or open space. An adverse effect is any harmful impacts arising from policies. These are set out in the IIA document. The EQIA ensures that the policies in the Barnet Local Plan do not discriminate in any form (age, sex, race, disability, religion, sexual orientation, marriage/civil partnership, gender reassignment). All site proposals are consistent with the policies and all policies have been subject to the EQIA.	Yes
Brent Cross South Partnership (DP9)	Chapter 1	The general policy approach set out in this section is supported and we note that key evidence base documents are currently being progressed which will further influence the draft policies. We would welcome discussion on these documents in due course.	The Council welcomes this support.	No
Elizabeth Silver	Chapter 1	Para 1.2.1 Add this definition: Sustainable development is defined as development that meets the needs of the present without compromising the ability of future generations to meet their own needs. (<i>Our Common Future, a report by the UN World Commission on Environment and Development, the Brundtland Commission, 1987</i>) Paragraph 1.4.3 Add: "sustainable development as defined in 1.2.1.	The Local Plan has been prepared within the context of the revised NPPF (2019) and its definition of sustainable development (paragraph 7 – 10).	No
Brent Cross South Partnership (DP9)	Para 1.1.3 Figure 1	This part of the Draft Local Plan describes the constituent parts of the Development Plan and other policy documents and guidance. We query whether the Brent Cross Cricklewood Development Framework SPG document is proposed to be updated or re-adopted as part of the Draft Local Plan.	There are no current plans to update the SPG	No
Geoffrey Silver	Para 1.1.6	This questionnaire is anonymous, but plan section 1.1.6 says that "respondents will be identifiable by name" - please clarify.	Questionnaire responses are anonymous while direct representations are identifiable	No
Home Builders Federation	Para 1.2.1	Paragraph 1.2.1 states that the Local Plan will operate over the period 2021-2036. It would be helpful to put this plan period on the front cover. However, we query why Barnet has chosen to adopt a different date series to the Draft London Plan. The Council should bring its Local Plan into conformity with the Draft London Plan and work on the basis of the time period 2019/20 to 2028/29. Despite the guidance in the NPPF, there is no point in planning beyond 2028/29 because the housing and employment land supply is uncertain beyond this date (see the Panel report on the Draft London Plan at paragraphs 150-152). As the Panel concluded, rolling-forward the existing target would not be effective. The London Plan will need to be updated by 2024 for adoption in 2025. Barnet should be prepared to update its Local Plan in line with the new London Plan so that it can slot into place as quickly as possible after this date.	We agree that 2021 – 2036 should be clearly stated on cover. This Plan needs to be in general conformity with the London Plan and the Mayor has not raised an issue about the timeframe of Barnet's Local Plan. As stipulated in the NPPF (para 33) there is a requirement for local plans to be reviewed to assess whether they need updating at least once every five years.	Yes
Ramblers Association	Para 1.2.2	Add policies to support health and wellbeing through active travel and links to countryside	This is reflected in supporting text for CHW02 and TRC01	No
Brent Cross South Partnership (DP9)	Para 1.3.2	This paragraph may benefit from an update to recognise that the Examination in Public of the draft London Plan has completed and the 'Intend to Publish' version has been issued and is likely to be adopted prior to the publication of the Reg. 19 version of the LBB Draft Local Plan.	Text has been revised to reflect the publication of the London Plan in March 2021.	Yes

Brent Cross South Partnership (DP9)	Para 1.4.1	We recognise that further documents as part of the Plan's evidence base are being prepared and will inform the Plan and its policies moving forward. Further detailed comments may arise on the relevant aspects of the Draft Local Plan once these documents have been made available.	Additions have been made to the evidence base and are published on our website	No
Former MHNF	Para 1.6.2	Section 1.6.2 should include mention of the fact that The MHNF has, on 6 March, made a new (revised) application to LBB Planners for Designation by the Council.	The MHNF application was withdrawn from the June 2020 Planning Committee by the applicant, as such there is currently no MHNF.	No
CCI London Community Church	Para 2.5.3	With the increase in both jobs, housing and population, what allowances have been made to support this? What strategies have been put into place to minimise any adverse effects which could lead to a lack of cohesion and safety within the community.	Ensuring community cohesion and safety is integral to the Local Plan. Policy CHW04 has been revised to better express what the Council will do to achieve this as Barnet grows and changes.	No
CCI London Community Church	Para 2.6.4	Consideration should also be placed on parking for the population and visitor increase.	Local Plan's restraint based approach to car parking is clearly set out in Transport and Communications	No
Brent Cross South Partnership (DP9)	Chapter 2	The Brent Cross Growth Area and delivery of the BXC planning permission will be a significant contributor to the Borough's growth objectives and will help establish a new character for a large area within the Barnet. BXC's contribution in this respect should be recognised here.	Text revised to highlight contribution of BXC	Yes
Elizabeth Silver	Para 2.1.1	Add: With more high-density living, fewer gardens and developments on green spaces, and also with more remote-working opportunities, young families are moving out of London. https://www.theguardian.com/uk-news/2019/jun/29/tired-of-london-thousands-flee-capital-for-a-quieter-life Therefore these population projections may become out of date. Supporting Comment: An increase in population from 392,000 to 452,000, or 15.3%, is incompatible with cuts in community infrastructure spending such as healthcare and libraries unless we are prepared to accept a lower standard of living..	The Council has based its strategy on the latest and most up-to-date population projections produced by the GLA. The Reg 19 Local Plan is supported by the Infrastructure Delivery Plan (IDP) which provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No
Elizabeth Silver	Para 2.6.1	Replace the word "congestion" (which applies to cars as well as buses) by "insufficient bus routes and frequency"	Congestion is the appropriate term. The Strategic Transport Assessment provides more detail about bus journeys	No
Barnet Cycling Campaign	Chapter 2	Studies shown that the main impediment to mass-cycling is the lack of safe infrastructure to keep cyclists safe from motor vehicles.	The Infrastructure Delivery Plan has been published as part of the Reg 19 Local Plan	No
Barnet Cycling Campaign	Chapter 2	Low Traffic Neighbourhoods (LTNs), School Streets, 20 mph limits, shared mobility and reducing traffic would all benefit cycling and improve physical and mental health. LTNs work and are popular with residents. School streets and 20 mph limits improve safety and encourage parents and children to use active transport to school. Barnet has no School Streets.	The Long Term Transport Strategy sets out proposals for increasing walking and cycling. The Local Plan has been updated to reflect the progress of the Transport Strategy	Yes
Barnet Cycling Campaign	Chapter 2	School Travel Plans need to consider suitable school uniforms. At schools where the uniform is much more suitable for cycling (polo shirt, sweatshirt, black trousers or shorts or a skirt) the level of cycle use is high as a result.	This is not a matter the Local Plan can address.	No
Barnet CCG	Para 2.5.1	Welcomes acknowledgement that health and wellbeing is strongly influenced by the environment in which people live and that planning policies and decisions can contribute to the prevention of ill-health and encourage healthy lifestyles. Health inequalities linked to deprivation should be recognised as a key challenge for the plan. In particular, the Council's programme of housing estate renewal has potential to positively address deprivation and inequalities.	Agreed that health inequalities linked to deprivation represents a key challenge for the plan and that housing estate renewal has potential to positively address deprivation and inequalities.	Yes
Brent Cross South Partnership	Section 2.1	We suggest that additional text is added to the description of Barnet's character to recognise that the character of the borough is set to further evolve, particularly in Growth Areas.	Agreed. The character of the Borough is evolving	Yes
Redrow Homes	Section 2.2	Should include reference to delivering at higher densities to achieve housing targets	Following the Mayor's London Plan, the Council is taking a design led approach to providing the most efficient use of land rather than setting density guidance.	No

Barnet Society	Section 2.2	Support the views submitted by the Federation of Residents' Associations of the London Borough of Barnet (FORAB).	The Council refers to its responses to representations raised by FORAB	No
Brent Cross South Partnership	Section 2.3	The Brent Cross Cricklewood regeneration will provide employment, retail, leisure and office space alongside other town centre uses: it is an emerging new town centre and destination which will contribute significantly to the Borough's economy and should be recognised within this section.	Agreed. Text revised	Yes
Environment Agency	Section 2.4	Our response to the Integrated Impact Assessment Scoping Report consultation (February 2019) identified some of the environmental characteristics within our remit. We would like to see the section on environment broadened to include the points above, so there is a more complete picture of Barnet's environmental challenges and opportunities. For species and habitats data and to see population trends we recommend using the Greenspace Information for Greater London website (www.gigl.org.uk). Barnet's environment features should be displayed on a map within the Local Plan, for example, flood risk and watercourses	Agreed This section has been revised	Yes
Ramblers Association	Section 2.5	Opportunities to improve Health and Wellbeing in 2.5 could include an additional paragraph on active travel and access to the countryside.	There are sufficient references within the Plan to accessing Barnet's greenspaces	No
Barnet Society	Sections 2.4 & 2.5	Agree with these sections but would like to see their interconnection acknowledged.	Para 5.1 makes this interconnection	No
Barnet Society	Para 2.1.2	Strongly support the Council's wish to use the Borough's open spaces to improve the health and wellbeing of its residents and attract visitors to the area. But to 'maximise' usage without proper care for its impact risks damaging our green and blue assets; the Council should 'optimise' usage (i.e. 'get the best out of', to quote the Vision, 3.1.1.).	Support welcomed – agree reference in last sentence ought more appropriately refer to "optimise the opportunity...."	Yes
Barnet Society	Para 2.1.4	Agree that sustainable growth is key, but it should be supported by commitment to the highest environmental standards reasonably attainable. By 2036, the end date of this Strategy, it will probably be too late to mitigate catastrophic climate change. That challenge must be at the forefront of the Council's planning now.	Agreed	Yes
Former MHNF	Para 2.2.1	The Council should encourage pro-active engagement with 'precision manufactured housing' in order to deliver affordable and high-quality family houses at an economic cost. These modular systems will become increasingly available as they are already in Europe (Germany and Scandinavia particularly). Use of these systems will greatly improve completion times since the components are manufactured in a factory, transported to a location and assembled, usually within a very short space of time, on site. The Council could encourage the use of this method by applying to it a simplified and speeded up Planning Consent programme, provided all appropriate planning guidance has been observed.	The Council supports innovation to deliver homes more quickly. The housebuilding industry, with the encouragement of Government, needs to meet this challenge	No
Former MHNF	Para 2.3.1	The MHNF wholeheartedly agrees with this section. The UK Retail market has indeed been 'experiencing significant structural and conceptual changes' due to competition coming from on-line retailers. On-line banking has, for many, reduced the need to visit town centres, thus further reducing footfall for retailers. There will shortly, for example, be no retail banking presence at all in Mill Hill's main street. The period for this draft plan will see even greater pressure upon the retail sector, and the Plan will have to make provision for a decreased retail presence on both Barnet and many other high streets throughout the UK. Vacant premises on the high street already bear witness to this fact. We recommend that the Council gives serious consideration to the possibility of offering Business Rates based not upon the value of the property, but upon the turnover of the business concerned. Local independent traders should also be given favourable treatment.	Support welcomed.	No
Barnet Society	Para 2.3.1 & 2	Welcome Council commitment to our town centres, and to sufficient provision of affordable and flexible workspace, particularly in town centres.	Support welcomed.	No
Spires Barnet (Williams and Gallagher)	Para 2.3.1 & 3.11	Support the recognition of changing structure and challenges faced by town centres and the need to be responsive and adaptable. Delivery of 6,100 homes in town centres and mixed use development in TCs also supported.	We welcome this support.	No

	GSS01 & 08			
Theresa Villiers	Para 2.3.1 & 4.19.5	Welcome intention of draft Plan to support local town centres, in particular the encouragement of flexible workspace. Supportive of greater residential provision if proportionate; however, not 'car-free' proposals as there should be provision of sufficient off-street parking spaces.	We welcome this support. Car-free development is only considered as having potential in areas with the highest public transport accessibility levels in Barnet. PTALs 5 and 6.	No
Former MHNF	Para 2.3.2	The Council should take steps to encourage a good mix of employment in the high street, not simply a series of low paid service jobs. Unfortunately, a large number of highly skilled jobs have moved out of Barnet in recent years. This will indeed require 'sufficient provision of affordable and flexible workspace'.	Improving access to new job opportunities is covered in the Economy Chapter	No
Former MHNF	Para 2.4.3	The drive toward zero carbon needs to be examined carefully. It has to be applied when consideration is being given to planning applications such as Partingdale Lane (19/6641FUL) where the National Grid proposes to use outdated technology in the erection of a 'Peak Power' Station. Extremely pollutive emissions will result. This can be avoided if such power stations adopt techniques that can substantially decarbonise operations. These methods are not even expensive. This type of plant should also be excluded from areas of Green Belt. For the first time judges, in the recent decision on Heathrow Airport expansion, have said that plans for a major infrastructure project are illegal because they breach the UK's commitments to reduce greenhouse gas emissions to tackle the climate crisis. This is a ground-breaking legal decision that could affect future infrastructure developments and puts the UK's commitment to cut emission to net zero by 2050 at the forefront of future policymaking.) There is a legal obligation to deliver net zero carbon by 2050 and meet the criteria of the Paris agreement. We see that Barnet have produced their draft integrated impact assessment for the Plan: https://www.barnet.gov.uk/sites/default/files/ia_report_part_1_0.pdf There is however no mention of the Paris agreement in this document	Policy ECC01 has been revised to make more explicit reference to how measures taken through policies in the Local Plan will help to meet the target of net zero carbon dioxide. The Paris Climate Agreement has since been considered as part of the IIA policy review	Yes
Former MHNF	Para 2.5.1	'Health and wellbeing is strongly determined by the surrounding environment in which people live'. The Forum agrees. This factor should be at top of mind when giving consent to tall buildings of new flats immediately adjacent to motorways.	Support welcomed.	No
Barnet CCG	Para 2.5.2	Helpful if the plan referred to specific opportunities to align health and planning.	Agreed – Reg 19 highlights strong relationship between health and planning particularly with regard to COVID19.	Yes
Barnet CCG	Para 2.5.2	Refers to the Joint Strategic Needs Assessment - would be helpful if the plan identified the key health needs and priorities facing the borough as summarised from the health and wellbeing evidence in the Local Plan Key Facts Evidence Paper (January 2020).	In the interests of keeping length of the plan manageable and the contents not becoming dated, cross referring to JSNA is considered appropriate.	No
Former MHNF	Para 2.5.2	The Forum is disappointed to note the refusal in 2017 of proposals to improve traffic flow and safety at Mill Hill Circus roundabout (junction of A41 and Mill Hill Broadway).	The Plan makes no reference to this refusal.	No
Geoffrey Silver	Para 2.6.1	you need to add the following exceptions: • Trains leaving Mill Hill East in the morning rush hour, e.g. 07:30 to 08:10, often have all seats taken throughout, and many more homes are still being built there, so Mill Hill East is now badly served, and more trains are urgently needed. • Watch Tower Site 49 has PTAL 1b, which is exceptionally low for development	Mitigating problems with overcrowding is considered through the IDP, Long Term Transport Strategy and Strategic Transport Assessment. A key aim of the draft transport policies is to address and mitigate any potential issues that arise from proposed development.	No
Former MHNF	Para 2.6.1	The statement 'Barnet is well served by public transport for radial travel but orbital travel is significantly more challenging' is a gross understatement. For example, if a patient has been asked to attend at Barnet General Hospital and he/she lives in the centre of Mill Hill, the distance to travel is 4.7 miles. By car this will take 13 minutes. By bus it will take one and a half hours involving a change of bus and a walk over terrain that is not suited to a patient who is likely to be feeling unwell. Similarly, the distance from Mill Hill to say Ealing in west London, is 9 miles. This takes 31 minutes by car but 77 minutes by bus. Thus, orbital travel around northern perimeter of London is poor, and it has a serious impact on	The Council has updated the Local Plan following production of the Long-Term Transport Strategy and the Strategic Transport Assessment.	Yes

		personal productivity. Many people are now time poor and cannot afford the time needed to go from A to B and back via the currently inadequate public transport system. Hence, they will continue to use their cars until a viable alternative is made available. We ask the question could an improvement be made by a beefed-up version of 'Dial A Bus'? We seek here suggestions as to improvements.		
Theresa Villiers	Para 2.6.3/4	Need for on-site car parking for new developments has not been recognised and will lead to more cars parked on already crowded streets. Although supportive of non-car based transport, the Plan needs to be realistic about modal shift.	Car-free development is only considered as having potential in areas with the highest public transport accessibility levels in Barnet. PTALs 5 and 6.	No
Barnet Society	Para 2.6.4	Agree with Council support for active travel and public transport opportunities, as well as promoting innovative ways to enable long term modal shift and would like overt commitment to cycling (human and electric-powered).	Agreed.	Yes
Redrow Homes	Para 2.6.4	Would be useful to identify the difference in car ownership between historic and recent developments (eg. Colindale Gardens provides 0.5 spaces per unit and not all spaces are taken up). Demand for car ownership in new-build appears to be lower than in existing development.	Barnet's Car Parking Study links property size and PTAL. Although the recommendation for PTAL 5 is up to 0.5, less than 2% of the Borough is within this PTAL and it will be a smaller portion that doesn't meet the CPZ and orbital PTAL of 4 or more so will be car-free in most cases.	No
Former MHNF	Para 2.6.4	The Forum doubts that in the next period of the Draft Plan 2020 to 2035, car ownership will fall substantially. There should however be a close examination of the effect of driverless cars that are likely to be available widely by 2030. This development might well help to reduce pressure on public transport. This will also affect the demand for car parking.	The technology for driverless cars is still emerging as is our understanding of their impact. More research is warranted. Therefore the next planning framework for Barnet should be the appropriate platform to address the spatial implications.	No
Environment Agency	Barnet's Vision & Objectives	Vision lacks ambition to support growth that benefits the natural environment and ensures resilience to climate change, for both people and wildlife. The Vision implies a continuation of the status quo for the environment rather than a firm ambition to improve it. For example, the vision could include aspirations to expand the green and blue infrastructure network in the Borough, reverse declines of biodiversity through net gain, restore rivers to more natural conditions making them more accessible and attractive for both people and wildlife, protect communities from flood risk now and into the future, seek measurable improvements in water quality, endorse tree planting and sustainable drainage measures across the Borough. We would like to see the Vision champion Barnet's environment and seek its betterment.	Agreed	Yes
Historic England	Chapter 3	We therefore advise that the Vision set out on page 20 makes specific reference to the Borough's heritage and the need to conserve, and where appropriate, enhance the historic environment	Agreed	Yes
Historic England	Chapter 3	We would expect to see the conservation and enhancement of the historic environment be referred as a key objective on page 21.	Agreed	Yes
Barnet Cycling Campaign	Chapter 3	The vision statements need an additional paragraph referring to the benefits to health, wellbeing, local environments and climate change arising from the provision for active travel, which will be integral to sustainable development. Concentrating the expected growth in Barnet's population on key transport corridors and sustainable locations provides an essential and unmissable opportunity to provide for active travel, improving the character of Barnet's town centres and the health and well-being of the population.	Agreed.	Yes
Finchley Society	Chapter 3	Chapter should reference Barnet as a constituent borough of Greater London with close links to Hertsmere in Hertfordshire.	Agreed. Reference made in Chapter 1.	Yes
Brent Cross South Partnership	Chapter 3	Throughout the plan references to "Brent Cross" and the "Brent Cross Growth Area" should be clarified to ensure that the terminology is precise and the differences between the various references made explicit. The optimisation of sites should be promoted in line with the draft London Plan.	Local Plan has been revised to ensure consistent terminology and general conformity with the London Plan.	Yes
Geoffrey Silver	Chapter 3	Vision section 3.1.1 says that "growth has been directed into the most sustainable locations with good public transport. These include ... Mill Hill East". The Mill Hill East development area is the only one so	Mill Hill East, in particular Millbrook Park is an example of good suburban growth. The Infrastructure	No

		close to precious Green Belt, and developments there are much denser than the characteristic density in Mill Hill. This has already resulted in high pressure on infrastructure, e.g. Mill Hill East trains and GP surgeries. In particular, the massive leap in density that has been allowed opposite Mill Hill East station is shockingly out of keeping.	Delivery Plan provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure. This will be a live document that is continually updated with internal and external partners.	
CCI London Community Church	Chapter 3	Q4 - 3.2.2 – How do you plan on supporting 'strong and cohesive communities'? Social infrastructure refers to what exactly? Although it is understood that additional housing needs to be built, the main focus appears to be just on housing, what about the current residents and what can be done for them whilst also adding to the sense on community? Q5 –the focus seems to be mainly on housing issues. Were the importance is evident, current residents do not appear to be taken into consideration. Furthermore, allowances for parking and increased car use do not seem to be considered. Although car use has lowered, with additional residents and population grow, this too will increase.	Social infrastructure includes schools, GP surgeries, community venues, green spaces and places of worship, is an essential resource but is also part of our sense of place and a part of our identity. It builds strong and cohesive communities. The Local Plan is focused on managing growth retaining the qualities that attract existing residents to live and stay in the Borough. The Local Plan follows a restraint based approach to car parking and encourages residents and visitors to use more sustainable forms of transport as an alternative to the car.	No
Elizabeth Silver	Chapter 3	The Vision and Objectives sound good on paper but they are not going to be delivered by the proposed plan. Too high a population density will work against many of the points in 3.2.2. Many young families are moving out of London due to high house prices and dense living conditions.	The Council considers that it has got the balance right in planning for growth and delivering the way forward to meet Barnet's challenges.	No
LB Haringey	Chapter 3	While supportive concerned as to how they have been translated into proposed Growth Strategy	The Growth Strategy Delivery Plan sets out the key projects where the Council will direct its future investment .This will be reflected in our Statement of Common Ground	No
Sport England	Chapter 3	Welcomes the Borough's vision to include active travel and promotion of health living.	We welcome the support.	No
Ramblers Association	Vision	Extend to include 'Getting the best out of our green and open spaces Barnet continues to be a place where people choose to make their home. Good access to these spaces contributes to the health and wellbeing of residents'	Ensuring such access is reflected throughout the Local Plan	No
Former MHNF	Vision	Para 3, last line... (of the vision) 'Outside these locations, growth has been supported in places with capacity for change and where local character and distinctiveness are recognised.' We suggest that a change is made as follows: 'recognised and preserved' – which links to the defining character areas in Mill Hill. With reference to the phrase "Getting the best out of our green and open spaces" Barnet continues to be a place where people choose to make their home. We suggest this is a bit ambiguous – What is 'the best'? Use for housing? How about 'Safeguarding our Green and Open spaces'?	The Plan's objectives highlight that rather than preserve character we seek to enhance. They also clarify that we want to improve access and enhance the contribution of green spaces.	No
Former MHNF	Vision	Para 6. 'Improved orbital activity'. Improvement here is a paramount requirement in the Plan for the next period 2020-2035	The Reg 19 has been updated to reflect the Long Term Transport Strategy and the Strategic Transport Assessment	No
Former MHNF	Vision	We question the statement in Para 5 'Barnet's town centres thrive'. With pressure on retail businesses, referred to earlier, employment will be reduced together with footfall. The Council should consider carefully how it can improve 'Polycentric Development'. We mean by this, that greater attention and encouragement should be given to outer London town and district centres. In reality, Central London, Brent Cross and say, Borehamwood often take pride of place, to the detriment of Mill Hill and other similar centres. As stated in the NLA's Guide 'London's towns have to be little pieces of city in their own right rather than dormitory suburbs, but also highly integrated with surrounding areas.' We recommend that Barnet Council incorporates many of the recommendations from this guide in its strategic design for	The Reg 19 reflects the Council's response to COVID19 and structural changes regarding composition and mix of uses and the support that will be necessary for ensuring the delivery of thriving town centres and local economy over the lifetime of the Local Plan.	Yes

		the future of the Borough. Significant action needs to be taken now by the Borough of Barnet to redress this imbalance. This Local Plan does not give us the impression that Barnet Council understands the severity of the many issues which face a growing borough		
Former MHNF	Vision	Para 7. A 'thriving jobs market'? This is simply not the case. We have dealt with this aspect earlier. The Council must give attention to improving the diversity in the high street, and accept that if retail is failing, it must be replaced by change that meets today's and future needs. Developments have been approved recently that certainly do not lead to a 'healthy and safe borough'.	The Reg 19 reflects the Council's response to COVID19 and structural changes regarding composition and mix of uses and the support that will be necessary for ensuring the for delivery of thriving town centres and the local economy over the lifetime of the Local Plan.	No
Former MHNF	Para 3.2.1	We do not see a 'connected borough'. In Mill Hill for example, consideration must be given via transport policy to connecting the area orbitally. Mill Hill East must in future connect easily with Mill Hill Broadway and Mill Hill mainline station. We also do not see a 'thriving town centre' here.	The Reg 19 has been updated to reflect the Long Term Transport Strategy and the Strategic Transport Assessment	No
Ramblers Association	Para 3.2.2	Suggest add ..'through a strategic walking network'	Walking is already clearly promoted through this objective	No
Barnet CCG	Para 3.2.2	Supports the objectives including those promoting healthy living and wellbeing and to meet social infrastructure needs. The objectives underpin the 51 plan policies and it would helpful if the links between the objectives and policies were clearly identified, particularly in relation to the healthy living and wellbeing objective.	Support for objectives welcomed. Table 2 has been revised accordingly.	Yes
Finchley Society	Para 3.3.1	The figure of 46,000 is fundamental and its implications for the whole borough over the plan period are unattractive. Draft plan is not as clear as it should be about the basis for this figure.	The housing target is now the London Plan target of 35,460	Yes
Former MHNF	Para 3.3.1	We simply do not understand the numbers given in this paragraph. We see here a requirement for 'a minimum of 46,000 new homes. Yet the population growth is stated elsewhere to grow from 392,000 to 452,000 at the end of the plan period, a growth of 60,000. Taking an average occupancy of 2.5 persons per home, we cannot reconcile these numbers. See also our comments at Section 5 below. We see that the SHMA dated 2018 indicates that average occupancy may reduce to 2.25 by 2041 (p25-26). Clearly this is not exact science. 452, 000 residents at 2.25av occupancy would indicate a need for 200,888 homes in total, and 46,000 new homes represents a 23% increase in homes, while population expectations suggest only a 15% increase. We suggest that the average occupancy has been reduced by virtue of developers building far too many 1- & 2-bedroom flats when 3-4-bedroom family houses are actually required. Further, there is an increase in intergenerational living which serves to increase the average occupancy, and many new residents in Barnet will tend to have larger families. Many young families are moving out of London as housing built in the last 10-15 years is not to their liking, being too small, too dense and lacking a garden. Accordingly, they will accept a longer commute. This also demonstrates that far too many expensive flats have been built rather than family houses.	The housing target is now the London Plan target of 35,460. Reference has been made to multi-generational homes and a definition added to the Glossary	Yes
Environment Agency	Para 3.3.2	There are positives within the objectives (3.3.2) such as 'to deliver an environmentally sustainable Borough' and 'enhance the contribution of the Green Belt, Metropolitan Open Land and other green spaces and infrastructure.' However, given the environmental opportunities, the environment should feature more strongly. The objectives concerning the environment are towards the bottom of the list which implies (however unintentionally) that Barnet's environment is lower down the list of priorities for the Borough. We'd like to see more ambition for the environment in the objectives. We would like to see an objective that recognises the value of water as a precious resource to homes and businesses whilst supporting wildlife habitats. There should also be an objective that seeks opportunities to integrate the natural environment into the urban landscape via green spaces, pocket parks, tree planting, sustainable drainage measures, so that there is habitat connectivity, water attenuation and resilience to climate change.	Agreed.	Yes
Former MHNF	Para 3.3.2	In order to decide, or indeed pass a view, on the number of new homes needed for the Plan period we would need data on a range of issues including the current level of affordable property, occupancy	The housing target is now the London Plan target of 35,460	Yes

		levels, rented v purchased, vacancy levels and the intended level of replacement of dilapidated homes that would be demolished and rebuilt on an existing site.		
Brent Cross South Partnership (DP9)	Para 3.3.2	To reflect Chapter 5, this paragraph should include reference to support for a variety of residential types and tenures, including e.g. build to rent and student accommodation.	This is reflected in the reference to rental options	No
Theresa Villiers	Policy BSS01	Strongly urge the reduction of at least 20% the draft Plan target of 46,000 (to 33,460). Would like the Council to review projected population growth to ensure the information is up to date. Every effort should also be made to ensure homes are sold to local people and key workers rather than overseas investors.	The housing target is now the London Plan target of 35,460. Changes in population will be reflected in the next review of the London Plan. Controlling the purchase of private new homes by overseas visitors is a matter for the Government to address.	Yes
LB Brent	Policy BSS01	Amendment to the punctuation would improve the clarity of this draft policy. c) In order to better manage the impacts of development on the climate, growth will be concentrated in accordance with the Local Plan's suite of strategic policies GSS01 to GSS13 in the most sustainable locations with good public transport connections.	Agreed This will be reflected in our Statement of Common Ground	Yes
Historic England	Policy BSS01	the plan would be improved by making specific reference to heritage at the strategic level. Part c) of the policy could be amended to in this respects, alternative wording could be: <i>where there is recognised capacity, and where the historic environment and local character can be conserved or enhanced as a result.</i>	Agreed	Yes
Barnet Cycling Campaign	Policy BSS01	Part c) of this policy should include references to active travel (cycling and walking) rather than just public transport as follows: "c) In order to better manage the impacts of development on the climate and traffic congestion, growth will be concentrated in accordance with the Local Plan's suite of strategic policies GSS01 to GSS13 in the most sustainable locations with good public transport connections and active travel provision. Outside of these locations, growth will be supported in places where there is recognised capacity and local character can be conserved or enhanced as a result."	Agreed.	Yes
Mayor of London	Policy BSS01	The Mayor welcomes the spatial strategy which sets out where Barnet will deliver its new housing and wider economic and social needs. In this regard, draft Local Plan Policy BSS01 should reference Barnet's opportunity areas as set out in Intend to Publish London Plan Policy SD1, as well as its growth areas, and not simply note these as being town centres and transport nodes. The Intend to Publish London Plan identifies three Opportunity Areas in Barnet. These are Brent Cross/Cricklewood (part) with an indicative housing capacity of 9,500 homes and 26,000 jobs; Colindale/Burnt Oak with an indicative housing capacity of 7,000 homes and 2,000 jobs; and New Southgate (part) with an indicative housing capacity of 2,500 and 3,000 jobs. Opportunity Areas are likely to receive significant amounts of investment, with partners focusing and coordinating delivery in these areas. Greater reference to the Opportunity Areas would also better reflect the areas identified in the associated Key Diagram, which includes Opportunity Areas. Greater emphasis should be placed on the potential role of Barnet's Opportunity Areas to meet its housing and wider needs given the wider investment likely in these areas. It would also be useful to have a map that sets out the Site Allocations within the growth areas to provide an indication how and where the growth will happen in each growth area. The Mayor welcomes the acknowledgement that growth must be planned to ensure suitable supporting infrastructure can be provided. In this regard, the Mayor welcomes Barnet's support for delivering improved transport capacity and infrastructure in the borough. To better support this, he urges Barnet to ensure that vital land necessary for the operations and enhancement of London Underground and rail services – particularly the Northern line – are sufficiently protected. Where there are opportunities to do so, development proposals should also contribute towards provision of step-free access and capacity enhancement at stations. The Mayor welcomes the joint working with Harrow to deliver development in the Edgware Growth Area.	Agreed. Policy BSS01 has been revised to identify the 3 Opportunity Areas in Barnet. Reg 19 better reflects the contributions of the Opportunity Areas as well as the Council's approach to the Growth Areas. Responses on other policy issues are set out in more detail at relevant sections in this Report.	Yes

		<p>Draft Local Plan Policy GSS07 – Mill Hill East should make it explicit that Green Belt must not be developed, except on previously developed land.</p> <p>With regards to the West Brent Growth Area, it would be useful to show this area more clearly on a map, as it is not shown on Map 3 Brent Cross regeneration.</p> <p>Most of Barnet's growth areas contain major road infrastructure and associated poor air quality. Barnet's growth policies should be clear that schemes should address air quality concerns and should not worsen air quality, for example by creating canyon effects along major roads. Future Supplementary Planning Documents (SPDs) and Masterplans should direct sensitive uses away from areas of poor air quality and include guidance on how to minimise exposure to poor air quality.</p> <p>Barnet's growth strategy broadly reflects Annex 1 Town Centre Network of the Intend to Publish London Plan. It sets out that Edgware (shared with Harrow) is a major town centre and Brent Street, Chipping Barnet, Church End, Finchley, East Finchley, Golders Green, Hendon Central, Mill Hill, New Barnet, North Finchley, Temple Fortune, Whetstone, Colindale/ The Hyde (shared with Brent), Cricklewood (shared with Brent/Camden), Burnt Oak (shared with Brent/Harrow) are all district centres.</p> <p>In addition, Brent Cross is noted as a potential metropolitan centre. For Brent Cross to be reclassified, a clear strategy should be developed and implemented (see Policy SD9 Town centres: Local partnerships and implementation) that secures a broader mix of store sizes and formats and a variety of town centre uses including retail, leisure, employment and social infrastructure, subject to demand, capacity and impact. The sizes and uses of premises should relate to the role of the future centre within the town centre hierarchy. In this regard, the Mayor welcomes draft Local Plan Policy GSS02 and the specific policy on creating a new Metropolitan Town Centre.</p> <p>Beyond the indicative job figures set out in Intend to Publish Policy SD1 for Barnet's Opportunity Areas, Policy E1 directs offices to town centres and notes that there is limited demand for office development in outer London. Of Barnet's district town centres only Temple Fortune and Cricklewood have been identified in Annex 1 of the Intend to Publish London Plan as having a medium potential for commercial growth including offices, with Barnet's other town centres having low potential. Small offices in Chipping Barnet, Church End (Finchley Central), North Finchley and Whetstone should be protected as these centres show demand for existing office functions, generally within smaller units. Barnet's site allocations that seek to protect office development should be focused in these areas.</p> <p>On a specific note draft Local Plan Policy GSS08 could be mis-read as the parking standards being minimums. The policy should be amended to make it clear that parking provision should be minimised, and not exceed the parking standards as set out in Tables 10.3 to 10.5 of the Intend to Publish London Plan. The Mayor welcomes the preparation of masterplans for the growth areas. These will create certainty to bring sites forward and speed up delivery.</p>		
Gwyneth Cowing Will Trust (Hill Group)	Policy BSS01	The adoption date of winter 2021 is challenging and the 15 year horizon should be extended to 2038.	Although date of adoption has slipped. The Council does not plan to change the Local Plan timetable and the Local Plan end date remains as 2036.	No
Lansdown	Policy BSS01	Policy BSS01 is generally strong in setting out the key targets for the Council, and the Spatial Strategy requires updating to reflect current needs. However, the decision to not meet the full OAN for housing Barnet may cause issues at Examination, and also requires strong justification. In this sense, Alternative Option relating to setting the housing target based on capacity including green field / Green Belt sites should be considered more, as sustainable sites on this type of land could make a meaningful contribution to the housing supply in Barnet.	Barnet's Green Belt Study will help inform any future London wide review led by the Mayor. Any revisions to Green Belt / MOL made through the next review of the London Plan will be reflected in the Local Plan after this.	No
Harrison Varma Ltd (Savills)	Policy BSS01	The draft Local Plan seeks to deliver a minimum of 46,000 new homes (3,060 per annum) between 2021 and 2036. The Council has set this target following the preparation of a Strategic Housing Market Assessment. This target is well below housing need when calculated using the Government's Standard Methodology (applying this methodology the Council is required to deliver 4,126 new homes per annum	The housing target is now the London Plan target of 35,460	No

		<p>or 62,000 new homes over the proposed life of the Local Plan). Taking account of this significant shortfall, it is important that residential intensification of sustainable locations should be supported within a positive planning framework. This should mean both the identification of additional sites that can be allocated for the delivery of residential units and ensuring that all policies can provide a positive context for the delivery of additional residential accommodation. Whilst it would be more appropriate to establish a housing target for the Local Plan that responds to the Government's Standard Methodology, if the Council justifies maintaining a lower minimum housing target then the policies of the Local Plan should be worded to support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality. In this context, the clear statement within Policy BSS01 that the Local Plan will deliver a minimum of 46,000 homes between 2021 and 2036 is appropriate. All other related policies should be worded to ensure that a positive presumption exists for the delivery of additional residential units in excess of the minimum target, subject to assessment of any proposal in the context of other material planning considerations and responding to the direction of the Replacement London Plan's emphasis upon site capacity being based in design-led optimisation as opposed to a specific density in any individual location. This point is further emphasised by the Secretary of State's response to the Intention to Publish version of the London Plan which makes plain that London as a whole needs to deliver even more homes than noted by the London Plan. Given this, all housing targets must be considered as minimums and policies be worded to support delivery at higher levels where this is possible through appropriate design.</p>	<p>The Council considers that the policies of the Local Plan are sufficiently worded to ensure support for additional housing delivery where proposals are demonstrated to be of high design quality.</p> <p>Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.</p>	
Brent Cross South Partnership (DP9)	Policy BSS01	<p>As noted above, reference to 'Brent Cross' should be clarified and should mean Brent Cross Cricklewood as a whole. The figures at part (a) ii. are not expressed consistently: the Zonal Floorspace Schedule within the Development Specification Framework of the BXC outline permission specifies c.395,000m2 of business use site wide and c.110,000m2 of retail uses site wide (but c.55,000m2 relates to floorspace North of the A406). This should be made clear or the figures used consistently. Part (a) ii. should also recognise the other land uses that will be brought forward within the Brent Cross Growth Area including new homes and employment floorspace together with a mix of other uses (including, education and leisure) in a new town centre with new and improved public spaces (including proposed improvements to Clitterhouse Playing Fields). Given the draft London Plan's aspirations for optimising land opportunities and increasing site capacity, we suggest that floorspace figures allow for optimisation where appropriate. As noted above, reference should be made to the new town centre both north and south of the A406 at Brent Cross.</p>	Agreed. Figures corrected	Yes
Environment Agency	Policy BSS01	<p>(NPPF para 20). NPPF para 149 states that plans should take a pro-active approach to mitigating and adapting to climate change taking into account the long-term implications of flood risk and water supply, etc. Also paragraphs 156 and 157 require strategic policies should be informed by a strategic flood risk assessment and inform a sequential risk-based approach to the location of development. Policy SI 5 Water Infrastructure of the London Plan (Intend to Publish version, December 2019) calls for working with Thames Water in relation to local waste water infrastructure requirements and the potential need for Integrated Water Management Strategies for growth locations in areas with insufficient water management capacity or flood risk. We need to see evidence of how the sequential test (and where applicable the exceptions test) has been applied to the spatial strategy and site allocations based on the strategic flood risk assessment mapping including climate change. We recommend the Sequential Test is undertaken in tandem with a Level 2 SFRA. We have reviewed the Site Selection Background Report December 2019. Although flood risk was one of the factors checked, the constraint resolution as part of the site assessment reveals flood risk was only referenced as a limiting factor, as there might be possible ways to mitigate risks or impacts. Whilst we agree flood risk does not necessarily rule out all sites, there are some sites where the severity of the flood risk and the hazard this represents should potentially rule out further consideration. In addition, the constraint resolution principle applied to the</p>	Key findings of the IDP are reflected in BSS01 and an additional/expanded policy included in the Environment and Climate Change Chapter. A Level 2 SFRA has been published alongside the Reg 19 which includes and been used to inform revised site proposals.	Yes

		<p>Site Selection process on flood risk doesn't fit with the aims of the flood risk Sequential Test for Local Plans (NPPF paras 157 and 158) We will also need to see evidence within the Integrated Impact Assessment, latest IDP and Local Plan (preferably supported by a background paper or Integrated Water Management Strategy) of how water supply and waste water capacity considerations have been taken into account in the planning for this level of growth (46,000 new homes plus office and retail space) and that the infrastructure will be in place to support this, at the right time, without detriment to the water environment. Currently these crucial elements are missing, and we would have to find the Local Plan unsound.</p>														
<p>Taylor Wimpey Strategic Land (Lichfields)</p>	<p>Policy BSS01</p>	<p>It is noted that the housing requirement for Barnet has been reduced in the Intend to Publish London Plan, as a result of the recommendations included in the Panel Report (2019). This is largely in response to the current land supply constraints London has in seeking to meet this need. The housing requirement now proposed is therefore much lower than the need identified through both the proposed OAN for the borough (as calculated in the GLA SHMA (2017)), and the standard method as now required under in paragraph 60 of the NPPF (2019). This is shown in more detail in the table below, and demonstrates the extent of the unmet need that will occur annually compared to the most up to date measure of need (latest standard method figure of 3,971 dpa). This illustrates how significant the housing shortfall will be if LBB does not seek to exceed the housing requirement.</p> <table border="1" data-bbox="392 603 1079 738"> <thead> <tr> <th></th> <th>New London Plan (Intend to Publish, Dec 2019)</th> <th>LBB Proposed Requirement in emerging Local Plan</th> <th>Originally identified need in the New London Plan (July 2017)</th> </tr> </thead> <tbody> <tr> <td>Annual Requirement (dpa)</td> <td>2,364</td> <td>3,060</td> <td>3,134</td> </tr> <tr> <td>Shortfall compared to standard method (dpa)</td> <td>-1,607</td> <td>-911</td> <td>-837</td> </tr> </tbody> </table> <p>In this context, there are a number of issues that LBB need to address in determining its housing requirement in the emerging Local Plan to ensure that sufficient homes are delivered in the borough during the Plan period to meet identified needs.</p> <p>In the first instance, the Secretary of State (SoS) published his letter in response to the New London Plan. Of most relevance here, he has exercised his powers under section 337 of the Greater London Authority Act 1999 to direct that the Plan as drafted cannot be published due to 'a number of inconsistencies with national policy and missed opportunities to increase housing delivery'. He has reiterated the need for an immediate review of the London Plan to ensure that London seeks to meet its housing needs without delay. Notwithstanding this, a key point is that the housing requirements set out in the New London Plan are minimum targets and that these only cover the period for 2019/20-2028/29. As the Barnet Draft Local Plan covers the period 2021-2036, the housing requirement should reflect this and identify a requirement which includes anticipated needs beyond 2028/29 as indicated above and in the light of the real likelihood that there will, by then, be a reviewed London Plan. LBB should therefore be looking to deliver more than its requirement in order to support the Government's objective to significantly boost the supply of housing (NPPF, paragraph 59), and not fall foul of the same issues currently facing the New London Plan. Linked to this, the Panel Report on the New London Plan raised serious concerns that the Green Belt boundaries were not being reviewed, whereby: "From the evidence we hear the inescapable conclusion is that if London's development needs are to be met in future then a review of the Green Belt should be undertaken to at least establish any potential for sustainable development. Therefore we recommend that this Plan include a commitment to a Green Belt review. This would be best done as part of the next London Plan." (Paragraph 457) The Panel Report goes on to suggest that a review of the London Plan could come forward in 2022 (paragraph 596), which is early on in LBB's emerging Local Plan period and further underlines that the Local Plan must have a long-term view in seeking to sustainably meet housing needs for 2021-2036. The SoS has</p>		New London Plan (Intend to Publish, Dec 2019)	LBB Proposed Requirement in emerging Local Plan	Originally identified need in the New London Plan (July 2017)	Annual Requirement (dpa)	2,364	3,060	3,134	Shortfall compared to standard method (dpa)	-1,607	-911	-837	<p>The housing target is now the London Plan target of 35,460 new homes</p> <p>The London Plan (published in March 2021) sets a target figure for Barnet of 23,640 net housing completions for the ten year period up until 2028/29. As stated in the Reg 19 draft plan, the Council considers this to be a minimum target</p> <p>Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.</p> <p>As stated in para 4.1.11 of the London Plan, in terms of a target beyond 2028/29, boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward.</p> <p>Barnet's Local Plan will in any event need to be reviewed at least once every five years and so then be capable of responding to any future evidenced based changes (such as population projections and a strategic review of the Green Belt / MOL) reflected in a future London Plan.</p>	<p>No</p>
	New London Plan (Intend to Publish, Dec 2019)	LBB Proposed Requirement in emerging Local Plan	Originally identified need in the New London Plan (July 2017)													
Annual Requirement (dpa)	2,364	3,060	3,134													
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		also provided modifications to various policies including to the Green Belt and MOL policies to ensure they reflect the requirements of national policy. This therefore now allows LBB to release Green Belt and MOL land to meet housing requirements, and for MOL removes the requirement for no net loss. As such, LBB should seek to review their Green Belt and MOL land again and release any land not meeting the relevant GB/MOL requirements to ensure that housing can be delivered. As set out later on in this letter, land east of Colney Hatch Lane is one such site which could support LBB in meeting its housing requirement. On the basis of the above, LBB should be looking to identify a range of sustainable housing sites to accommodate well in excess of the minimum requirement identified in the current draft London Plan. This would ensure that it can meet housing needs for the future, in particular recognising the unconstrained need identified for the borough and the fact that there are sites which have not yet been identified for development that could come forward, such as the land east of Colney Hatch Lane.		
Whetstone Properties Ltd (Simply Planning)	Policy BSS01	It cannot be considered to form 'exceptional circumstances' and we consider the use of a housing figure of 46,000 is not in accordance with paragraph 60 of the NPPF and the plan cannot be considered sound with such a significant shortfall against the standard methodology.	The housing target is now the London Plan target of 35,460 . Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.	No
New Barnet Community Association	Policy BSS01	Questions the assumptions and projections of the SHMA, contradictions with OAN. Eg. with population growth of 60,000 and 46,000 new homes this equates to 1.3 persons per property. At current home occupancy rate this would equate to population increase of 115,000 which would need infrastructure support and planning that hasn't been reflected.	The housing target is now the London Plan target of 35,460 MHCLG projections are the starting point for the SHMA. Figure 1 of the SHMA sets out the process for calculating a housing requirement.	No
Ropemaker Properties (Barton Willmore)	Policy BSS01	No reference to growth in industrial or warehousing uses.	Policy BSS01 focuses on the main components of growth. The London Industrial Land Demand Survey estimated a need of 7.3 ha of industrial land	No
London Diocesan Fund (Iceni Projects)	Policy BSS01	The policy states that between 2021 and 2036 the Plan seeks to deliver a minimum of 46,000 new homes. This is based on the Strategic Housing Market Assessment published in 2018. Councils are required to use the standard method to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. This formula revealed that the Council's minimum housing requirement is 62,000 over the plan period. While it is acknowledged that the emerging London Plan has set a lower housing target for the Borough, there is a clear imperative to maximise the Council's housing target and explore the potential for meeting a higher housing target. Furthermore, the London Plan approach of opposing Green Belt release in Local Plans has not been deemed sound by the Examiners and thus cannot be used as a reason for Barnet to avoid reviewing the Green Belt. As set out the Consultation document, an alternative option for the spatial strategy was to set a housing target based on capacity using brownfield sites with development of green field / Green Belt sites. This would meet a greater proportion of the Borough's Objectively Assessed Housing Need, however the Council state that it would not meet the tests of the NPPF (para 137) necessary in order to demonstrate exceptional circumstances sufficient to justify Green Belt release and therefore a strong likelihood that the strategy would be found unsound. We do not consider this approach to be justified. Barnet is no different from any other local authority with significant levels of	Barnet is a London Borough and therefore the London Plan forms part of the development plan for Barnet. The housing target is now the London Plan target of 35,460 Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.	No

		housing need who cannot meet it within the built-up settlement boundary. There is a clear and well-defined approach as defined by the Calverton High Court Judgement, this states that the following procedure should be followed: 1. The acuteness/intensity of the housing need should be assessed. 2. the constraints on the supply/availability of land suitable for development should be understood. 3. The difficulties in achieving sustainability without impinging on the Green Belt should be reviewed; 4. If the Council cannot accommodate growth outside of the Green Belt then potential for exporting that need to neighbouring authorities should be tested; 5. If none of the above steps can avoid delivering housing in the Green Belt then the nature and extent of the harm to this green belt should then be assessed against how far the impacts on green belt purposes could be reduced when delivering housing on Green Belt sites. These five clear steps have not been followed, the Council has stopped at Step 2, without properly understanding the potential of the Green Belt for delivering growth. We consider that due to the unlikelihood of adjoining authorities accepting growth from Barnet the Council should be assessing the potential of the Green Belt to accommodate growth in order to be considered sound.	As part of the supporting evidence used to inform the Local Plan the Council commissioned consultants LUC to undertake a review of Barnet's Green Belt and MOL. Once adopted, Barnet's Local Plan will need to be reviewed at least once every five years and so then be capable of responding to any future evidenced based changes (such as population projections and any future strategic review of the Green Belt / MOL) reflected in a future London Plan.	
Finchley Society	Policy BSS01	The Alternative Options advert to several matters that should be explored a little in the actual text and would make other policies on the environment etc. easier to achieve. Phrases like 'is expected to accommodate' treat the borough as if it were totally passive; the Council could do something to reduce the growth and the text should explain why it does not attempt this. Barnet is not an island and is affected by the policies on housing and affordability pursued by neighbouring authorities, within and outside Greater London.	The housing target is now the London Plan target of 35,460	Yes
Barratt London (QUOD)	Policy BSS01	Support Barnet's approach to deliver between 2021 and 2036 a minimum of 46,000 new homes, which equates to a minimum of 3,066 homes per year (its Full Objectively Assessed Need for housing) - this is intentionally in excess of the Intend to Adopt London Plan requirement of 2,364 homes per annum, as it is not considered that 2,364 homes per annum would not fully meet Barnet's objectively assessed housing need.	The housing target is now the London Plan target of 35,460	No
LB Haringey	Policy BSS01	Questions why Barnet is not planning for the housing target specified in the Intend to Publish London Plan as a starting point – noting Haringey is not able to accommodate housing shortfall in other Boroughs.	Agreed. This will be reflected in our Statement of Common Ground	Yes
Federation of Residents Associations in Barnet (FORAB)	Policy BSS01	We are mindful that the 15 year target for the Borough is not necessarily settled and could be any one of 33,460, 46,000 or 62,000. We are however quite sure that the Inspectors recommendation that the target set in the Draft London plan should be reduced by 20% was soundly based. We are not proposing to examine here the viability of all the agreed and potential schemes identified by the council, but we are persuaded that 46,000 let alone 62,000 is unrealistically ambitious. In trying to assess what might reasonably be delivered we find the figures presented in the draft as unhelpful, indeed confusing. The only information on overall new homes delivery is the table 5 at 4.7.6. This serves to confuse rather than illuminate. The council does have specific data on schemes under construction, approved, or with planning applications submitted, which in total amount we understand amount to over 30,000 homes. This information should be presented in the document in tabular form as Appendix 1. Featuring 67 potential sites in the appendix is indeed misleading when many other more advanced and significant projects are not identified. Further, some of the 67 projects have approval or planning applications in and should be included in group above. We reckon maybe 9,000, not 16,000 homes should form an Appendix 2 of sites for which no proposals for development yet exist. We also consider that many of these sites are speculative to the extent that they are unlikely to proceed to redevelopment, and this is especially unhelpful as those locations will effectively now suffer planning blight with owners lacking any incentives to effect improvements. For potential sites the London Plan encourages Boroughs to set out acceptable height, scale, massing and indicative layouts. In the draft Local Plan we simply have indicative volume based on the density matrix. This is most unhelpful for communities who may rightly be concerned about what might happen on these sites. It is also an opportunity to get ahead of	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable In Annex 1 of his letter of March 13th 2020 to the Mayor of London the Secretary of State clearly states 'The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their local plan development, unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this plan.' Progress on delivery of this number, and the progress of site proposals, is fluid and is best captured in the AMR housing trajectory. Supporting text around Table 5 (and Table 5 itself) has been revised to provide greater clarification on delivery against numbers.	Yes

		developers who might otherwise come forward with unpalatable proposals. We recognise that undertaking a comprehensive assessment as suggested by the Mayor would be demanding, but we do consider that more effort should be made to assess the potential of any development other than just indicative numbers, some of which could turn out to be very misleading. The site descriptions at the end of the document could perhaps be expanded without too much difficulty to set down some principles for development.	Sites in the Schedule of Proposals are not speculative. They have gone through a robust site selection process. Individual site proposals have been revised to provide greater clarification on the parameters of proposed development including heights. The Local Plan supports strongly a design led approach to growth	
West Finchley Residents Association	Policy BSS01	Refers to draft London Plan target to be reduced by 20% and the stated 62,000 homes is unrealistic and unnecessary. Support was noted for the IDP alongside future housing development.	The housing target is now the London Plan target of 35,460	Yes
Taylor Wimpey North Thames (Armstrong Rigg Planning)	Policy BSS01	Support	The Council welcomes this support	No
Mayor of London	Policy BSS01	Welcomes commitment above Intend to Publish Plan target for housing. Should include reference and greater emphasis on OAs. A map of site allocations within growth areas would also be useful	The housing target is now the London Plan target of 35,460 which through the application of this policy framework is deliverable. The Plan has been revised to place a greater emphasis on OAs and produce clearer boundaries for Growth Areas with Local Plan proposals sites clearly marked.	Yes
Elizabeth Silver	Policy BSS01	Building 46,000 homes for an increase of 60,000 in population means an average of 1.3 persons per household, ie people largely living alone. 55,000 m2 of new retail space in Brent Cross is unrealistic. It is well known that retail shopping centres are struggling due to internet shopping. Neither can they succeed as friendly "places" for meeting (unless they are in Victorian arcades) because they are on too large a scale with no architectural interest or green space. Alternative options: It should not be necessary to build in order to secure improvements in infrastructure. These should be planned ahead of housing. (The foundations of a house should be put in first, not after the house is built.)	The Plan acknowledges the impact that internet retailing has had on retail and provides flexible policies to enable town centres to respond. The system is based on contributions from implemented development funding the infrastructure rather than before it.	No
Home Builders Federation	Policy BSS01	While we acknowledge Barnet's positivity and ambition in planning for the longer term up to 2036 Part a) should be revised to bring the housing target in line with the time series in Table 4.1 of the Draft London Plan – namely for the plan to operate over the period 2019/20 to 2028/29.	The timeframe remains at 15 years. This is consistent with the NPPF	No
Barnet Society	Policy BSS01	Under: a) i - agree with FORAB that the target of 46,000 new homes is unrealistically ambitious. a) vi – Whilst having no objection in principle to a destination hub for sport and recreation at Barnet and King George V Playing Fields, strongly object to the Council's current proposal for a substantial development in the middle of the Green Belt.	We refer to the response to FORAB on BSS01 The Council considers that special circumstances support the proposal at King George V.	No
Redrow Homes (Avison Young)	Policy BSS01	Support	Welcome the support	No
Taylor Wimpey North Thames (Armstrong Rigg Planning)	Policy BSS01 & GSS01	In accordance with national planning policy, the Council's starting point for calculating its local housing need should be the standard method. The capacity to accommodate the level of identified need must be robustly assessed, including a Green Belt and MOL Review.	Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in	No

			the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies. . Barnet's Green Belt Study will help inform any future London wide review led by the Mayor. Any revisions to Green Belt / MOL made through the next review of the London Plan will be reflected in the Local Plan after this.	
Spires Barnet (Williams and Gallagher)	Policy BSS01 & GSS01	Is retail floorspace requirement deliverable – in reality more need for flexible space and repurpose existing retail. Evidence is outdated – 3 Experian briefing notes have since been published making adjustments to forecasts to reduce need. New retail should also include A3-A5 (as per TOW01)	The Plan reflects the changes to the Use Classes Order – A4 and A5 are now sui-generis and retail no longer exists as a specific planning use class.	No
Former MHNF	Policy BSS01(ii & iv)	We query the need for 55,000m2 of new retail space at Brent Cross and for 110,000m2 'across Barnet's town centres as set out in Policy TOW01'. This statement should come under close scrutiny. We have stated above that the retail market, in recent years, has been subject to sustained pressure from online competitors (Amazon etc). We believe that the Council is underestimating how difficult it is, at present, for all types of traders and restaurateurs. Profits at the best run and tested retail operators have been reducing in the current period by 25/45%. John Lewis, for example, is paying a 2% year- end bonus to staff. This is at the lowest level since 1953. We note your "floorspace needs assessment" in its comments on Mill Hill Broadway although the sands have shifted since your review. It is constrained by the building sizes of some sites and re-development is needed to secure its long-term future.	Brent Cross is a sub-regional destination attracting people for leisure and retail activities. The Plan reflects the extant consent for 55,000m2 at Brent Cross. The Plan as part of COVID19 recovery wants town centres to be thriving and when confidence returns the Council hopes that there will be commercial investment in leisure within town centres.	No
Environment Agency	Policy BSS01c	Part (c) stipulates that in order to better manage the impacts of development on the climate, growth will be concentrated in accordance with strategic policies GSS01 to GSS13 in the most sustainable locations with good public transport connections. Outside of these locations, growth will be supported in places where there is recognised capacity, etc. We are concerned to what extent flood risk and water quality have been considered as strategic matters which have informed decisions around the spatial strategy. Infrastructure for waste water, water supply and flood risk are strategic matters to be considered as part of strategic policies	Agreed	Yes
TfL	Key Diagram	Crossrail 2 is not proposed to extend further north than New Southgate. The Council may wish to consider including the Strategic Cycle Network and potentially key bus corridors.	Agreed. Key Diagram has been revised to show Crossrail 2 stopping at New Southgate	Yes
Roger Chapman	Key diagram	Add Barnet Wastelands to the key diagram	An allocation for Barnet Wastelands in the Local Plan is not merited given the regulatory powers the Council can use to bring homes back into use.	No
Brent Cross South Partnership	Key Diagram	Clarity on the distinction between Opportunity Areas and Growth Areas is needed. The new town centre designation for Brent Cross should also be identified.	Key Diagram has been revised	Yes
LB Brent	Key Diagram	Brent Cross/Cricklewood is identified as an Opportunity Area in the London Plan. To make the area more manageable for planning in more detail it is understandable that LB Barnet has divided it into three parts. Historically these have been identified as Brent Cross London, Brent Cross South and Brent Cross Thameslink/Brent Cross West. Within the preferred options document the names of these respective areas needs consistency. In addition, the terminology around Opportunity Areas and Growth Areas needs further explanation/clarity earlier on in the document. For example, the key diagram identifies Brent Cross as an Opportunity Area, whilst Policy GSS01 identifies what is presumably this area as Brent Cross Growth Area. Brent Cross London's area is identified on Map 3, whilst elsewhere within the text, what is presumably the same area is identified as Brent Cross North. It is only when you get to policy CDH04 Tall Buildings (a considerable way into the document) that some clarity is provided on sites with both the opportunity and growth area designations noted for sites at Brent Cross/Cricklewood and Colindale. Provide consistency/ clarity across throughout the document with regards to the 'growth areas'/ 'opportunity areas' and the opportunity area boundaries.	Key Diagram has been revised and clarification on Growth Areas has been added including clear boundary maps. This will be reflected in our Statement of Common Ground	Yes

Historic England	Key Diagram	Map 2 – the key diagram shows the Borough’s identified growth areas. Mill Hill will be the area with the highest sensitivities and we advise that this is set out throughout the plan where the Mill Hill growth area is being discussed.	The sensitivities of Mill Hill East, in particular the Conservation Areas and the Green Belt, are reflected in Policy GSS07 and supporting text	Yes
TfL CD	Key Diagram	Housing growth should be focussed in all accessible locations, particularly those with good public transport connections. The Key Diagram should therefore also highlight areas around underground and other railway stations that are suitable for housing growth.	This approach to sustainable growth is reflected throughout the Local Plan – particularly in Policy GSS09. All stations are already identified on the Key Diagram	No
Brent Cross Dev Partners (QUOD)	Policies Map	There are a number of changes proposed to the Policies Map including proposed deletions and additions. One such deletion is the Cricklewood Regeneration Area, and it does not appear that there are any proposals to replace this allocation. The London Plan identifies BXC as an Opportunity Area and as such, the DPs would strongly request that this is reflected in any update of the Policies Map. In addition, the DPs would recommend that the Brent Cross Growth Areas are included within the Policies Map.	Boundaries of Growth Areas have been added to the Reg 19.	Yes
Mays Lane Gospel Hall Trust	Policies Map	To request that LB Barnet correct the boundaries of the Green Belt as has been done in some other minor instances in the Local Plan Review. This is to reflect the existing urban character of the eastern third of the site which comprises the existing circa 5,000 m3 building. As these representations will go on to consider, this part of the site does not perform well to any of the primary functions of the Green Belt which is generally agreed by the 2018 Green Belt Study and therefore we request that the boundaries are revised accordingly to address this, taking this part of the site out of the Green Belt	The site, 310 Mays Lane, was not highlighted as a potential minor Green Belt boundary adjustment in the study.	No
Former MHNF	Table 2	If the plan is not careful Barnet will lose ‘The qualities that attract people to live, work and visit the Borough’ As an example, there is a Planning Application’ now on hand that will sacrifice a considerable section of Green Belt (19/6641/FUL). Policies should be developed also that will encourage good design that is also suited to this area.	The Council considers that it has the policies in place to protect the Green Belt	No
Brent Cross South Partnership	Chapter 4	Opportunities for optimising land and increasing site capacity across the Brent Cross Growth Area should be supported where justifiable, in line with the draft London Plan. The potential interrelationship between Brent Cross West and the Brent Cross Growth Area should be recognised, along with the opportunities for connectivity between the two.	Agreed	Yes
Barnet Cycling Campaign	Chapter 4	Much of the proposed growth is in specific areas that will see higher density or along major thoroughfares - which is optimal for cycling. Provision of adequate local services, including nurseries, schools, healthcare, leisure and shops in line with changing demographics, are essential to minimise the need to travel long distances.	Agreed. The plan and supporting evidence (IDP) highlight the importance of providing supporting social infrastructure and services commensurate to the quantum of development.	No
Sport England	Chapter 4	Although most policies seek to improve/create walking and cycling, there is a lack of reference to the need for enhanced indoor and outdoor sports facilities to accommodate proposed growth. Links to Active Design (produced in conjunction with PHE) should be made in the Plan – going further than Policy CHW01 (eg CDH01).	Further detail on sport and leisure infrastructure is set out in the Infrastructure Delivery Plan; however, Policy CHW01 does give consideration to Active Design principles.	No
Chris Carabine	Chapter 4	Concerned that there is massive residential development in the borough and Mill Hill in particular, but no local growth in employment opportunity.	Local Plan seeks to deliver 27,000 new jobs under policy GSS01 and sets out employment policies such as policy ECY01 which seeks to protect and promote employment opportunities and policy ECY03 which seeks to increase residents access to local job opportunities.	No
CCI London Community Church	Chapter 4	New Southgate station expected to support development how? Through housing or additional commercial space etc.	New Southgate Opportunity Area is highlighted in the London Plan. The boundaries of the Opportunity Area have not been formally defined but they will cross into LB Enfield and LB Haringey. Although largely based on delivery of Crossrail 2, if this project does not happen there will be a greater focus on opportunities	No

			in the area around the North Circular. Boundaries are more likely to be around this road than extending along the East Coast Line. The Council will be working with the other boroughs and the GLA on creating an area planning framework which will be subject to public consultation.	
LB Enfield	Chapter 4	It is noted that a significant amount of new development, particularly housing will be focused in the growth areas and close to the Enfield borough boundary. Whilst we do not have an objection to this approach in principle, we seek reassurance that the cumulative impacts of development continue to be evaluated through the Integrated Impact Assessment and discussed between the agreed working groups to be established between our respective authorities and have been taken into account. This would also ensure opportunities for greater flexibility to plan, appraisal and prioritise schemes locally. We are willing to continue to constructively engage on this matter as part of the Duty to Cooperate arrangements for Barnet's Local Plan. A positive collaboration should in turn facilitate/unlock residential and mixed-use development opportunities offered by planned improvements on the Piccadilly line with Cockfosters, Arnos Grove Southgate and in the longer-term Crossrail 2.	This will be reflected in our Statement of Common Ground with LB Enfield	No
LB Enfield	Chapter 4	London-wide housing targets remain challenging for our respective boroughs. We note that Barnet's housing levels of need remains substantial albeit lower than the housing needs arising from applying the Government's 'standard methodology'. There is a role for greater sharing of knowledge and evidence based on between our respective authorities and the technical approaches applied in meeting the housing need across our functional housing market area. Additionally, we would welcome early dialogue on strategic development sites adjoining Enfield, in order collaborate on optimising such opportunities. In relation to affordable housing, we support the inclusion of build-to-rent within the draft plan recognising that Government has redefined affordable housing needs to include people who can afford to rent, but not to buy.	This will be reflected in our Statement of Common Ground with LB Enfield	No
LB Enfield	Chapter 4	Enfield supports Barnet's approach to meet need by focusing on the efficient use of land and increasing the intensity and use of land, in key town centres. This approach is considered likely to meet the quantum of new housing required. Enfield is supportive of Barnet's approach to meeting the OAN of its borough over the plan period. Enfield's emerging Local Plan also involves a town centres first approach; delivering higher densities within existing built-up areas; creating healthier and more inclusive streets; estate-led renewal and regeneration and an integrated approach to blue and green infrastructure. Enfield's emerging housing work is evidencing an uncapped need in the region of 3,750 dwellings per annum between 2018 to 2036. This represents a sizeable uplift in the scale of housing need compared to previous plan requirements and current and emerging London Plan need figure. The Council is seeking to accommodate its identified OAN within its own boundaries and as such set out that all available land will need to be considered to meet the significant housing and employment need challenge. Enfield is undertaking its own capacity study and a Green Belt assessment in line with National Planning Policy Framework and Planning Policy Guidance (PPG). At this stage, it is not possible to provide a definitive view on the capacity of the urban area but the implications of accommodating such a high level OAN figure within the borough will need to be informed through outputs of key supporting technical evidence base. Therefore, Enfield is willing to continue to constructively engage on this matter as part of the DtC arrangements for Barnet's Local Plan, as well as our wider neighbours to discuss how this issue can be resolved and to share technical approaches to evidence preparation.	This will be reflected in our Statement of Common Ground with LB Enfield	No
Client interested in North Finchley TC	Chapter 4	Our client has interests in a number of sites across North Finchley and in particular, the realisation of the aspirations within the North Finchley Town Centre Framework Supplementary Planning Document (February 2018) ("the SPD"). The Council will be aware that the Secretary of State has recently	The Council welcomes this support.	No

		concluded that the emerging London Plan does not plan for a sufficient level of housing and directs that the Mayor adopts a more ambitious approach to encourage and support the delivery of more homes across the capital. The outcome of this request will need to be reflected in consequential updates to the Council's housing policies if the Local Plan is to meet objectively assessed housing needs. Our client supports the Council's recognition of the changing trends within the retail sector and the need for town centre's to diversity and would request that this approach to diversification should be taken forward and reflected in development plan policies. Our client is supportive of the spatial approach to delivering mixed use developments within Barnet's town centres and specifically in respect of the inclusion of North Finchley within this policy. Our client supports the requirements of Policy GSS08 in respect of optimising residential density and providing zero parking provision where appropriate. This will assist ensure that Barnet's town centres have the best chance of being revitalised in line with the aspirations of the New London Plan. Policy GSS12 is concerned with car parks and identifies that the Council will support development of and above surface level public car parks for residential and other suitable uses subject to requirements. Our client supports this approach to the redevelopment of car parks and notes that this policy will allow the maximisation of brownfield land and help to promote a modal shift to more sustainable modes of transport.	Barnet's housing target is expressed as a minimum and is in accordance with the London Plan	
Former MHNF	Chapter 4	We agree with the Spatial Strategy, which must be adhered to, and contributions from developers must be realistic to bring forward the infrastructure changes that are vital if the growth is to be properly managed for the benefit of all. You cannot expect existing residents to be positive about a new residential development when as a consequence, getting a doctor's appointment becomes impossible and secondary school places are no longer available in quality schools based in NW7.	The Infrastructure Delivery Plan (IDP) provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure. This is a live document that will be continuously updated. Planning Obligations in the form of CIL and S106 will be used to help deliver new social infrastructure in the Borough, including health facilities.	No
Environment Agency	Growth and Spatial Strategy	Both Colindale (opportunity area) and Edgware (growth area) include areas at risk of flooding from rivers. Mill Hill and New Southgate also appear to have some fluvial flood risk and are both opportunity/growth areas. Surface water flood risk is widespread across the Borough and there will be a presence of this type of flood risk in all growth/opportunity areas.	Agreed,	Yes
Friends of Finchley Way Open Space	Section 4.12	Support focus on Brent Cross as a destination shopping and leisure centre for local residents and those from further afield. The re-evaluation of the scale of the retail offering at Brent Cross and the inclusion of other types of facilities is welcomed. This would enable it to compete more effectively than at present with the Westfield sites in West and East London, however, better public transport links (especially Underground links) are essential to enable this. (mainly para 4.12.3)	Support welcomed.	No
Friends of Finchley Way Open Space	Section 4.13	Essential that developers contribute towards the cost of delivering infrastructure to support new housing, retail, industrial and office space. However, there is no mention of water and sewage supply or refuse removal from domestic and commercial sites, only of schools, primary care and various leisure facilities. (para 4.13.2)	Water and sewerage provision forms an important element of the Infrastructure Delivery Plan. The North London Waste Plan sets out policy on waste management facilities	No
John Cox	Section 4.14	Firstly, you say in the LDS: "There is an opportunity for an appropriate planning framework (Area Action Plan / Supplementary Planning Document) to be developed with LB Brent on Brent Cross West based on the delivery of West London Orbital Railway. This will unlock capacity for new homes and jobs as well as other benefits including improvements to the public realm." Have you made any decision on this "framework", please, or what will be considerations and likely time scales if you have not? Secondly, why does the Reg18 document say, in 11.3.38: "West London Orbital (WLO) is a new London Overground line (formerly known as the Dudding Hill Line)" Why "formerly"? That is news to us in Brent! Thirdly, as a representation to your Reg18 consultation, I would like to propose a new supporting document: "Brent Cross West Station Feasibility Study". It is referenced on your web page: https://www.barnet.gov.uk/regeneration/brent-cross-cricklewood/brent-cross-thameslink	Initial discussions have started with LB Brent about potential for a joint planning framework. No milestones have yet been established. Reference to Dudding Hill Line corrected. Brent Cross West Station expected to be near completion by Local Plan adoption in 2022. Given this progress we do not see merits in adding the Feasibility Study to the Local Plan Evidence Base	Yes

		<p>Under "September 2019" there is the Brent Cross West Station Feasibility Study: https://www.barnet.gov.uk/sites/default/files/wlo_brent_cross_west_interchange_feasibility_study_report_rev_p02.pdf</p> <p>This is clearly a strategic document, and material to Reg18, since under "November 2019" on that same referenced web page there is a validated planning (reserved matters) application 19/6256/RMA. The application is for a Brent Cross West station design that bizarrely does not have any reference to the feasibility study at all. That means the feasibility study must be a Reg18 strategic document, because it is not considered short-term! Supporting documents, of course, have to be relevant to a Local Plan, but they do not have to specifically affect wording. It can be assumed that all Reg18 supporting documents will be included with a Reg19 Local Plan and be accessible by an inspector. That is the justification and motivation for inclusion.</p>		
Brent Cross South Partnership	Section 4.14 and GSS03	Reference to the Brent Cross West Growth Area should recognise the adjacency/relationship with the Brent Cross Growth Area and Cricklewood Growth Area. The role of S106 and/or CIL for funding necessary transport and social infrastructure should also be promoted.	Agreed. Text revised.	Yes
LB Harrow	Section 4.16	Edgware Town Centre is bisected by the A5, although it is noted that the majority of the designated town centre lies within LB Barnet. Edgware Town Centre is classified within the draft New London Plan (2019) (Intend to Publish Version) as a Major Town Centre, with a high residential growth potential. The draft plan includes Policy GSS05 (Edgware Growth Area), which provides support to planning proposals that deliver growth and regeneration of the Town Centre, subject to delivering certain proposals. LB Harrow support the introduction of such a policy, recognising the growth opportunity for a highly sustainable location. As such, it agrees that the alternative option of not including an Edgware Growth Area policy would forgo this opportunity. Following on from the above, this policy is intended to be supported by a SPD. LB Barnet was successful in bidding for the Mayor of London's Homebuilding Capacity Fund, where it secured funding for the SPDs preparation for the Edgware Town Centre. By reason of the town centre overlapping administrative boundaries, LB Harrow are involved in the preparation of this SPD, and would be adopting it as part of its policy suite. LB Harrow look forward to continuing the dialogue and cross working with LB Barnet in relation to progressing this SPD, which will assist in guiding development of the Edgware Town Centre, and also across administrative boundaries.	Agreed. Text revised to acknowledge importance of town centre to LB Harrow residents. This will be reflected in our Statement of Common Ground	Yes
Friends of Finchley Way Open Space	Section 4.20	Existing public transport nodes I support the proposal that the requirement for car parking at TfL Underground stations should be reassessed and less land intensive options explored, rather than large scale reductions in parking. Not all residential areas in the borough are easily accessible by Underground and families may require more transport flexibility. (para 4.20.11)	Support welcomed.	No
Friends of Finchley Way Open Space	Section 4.20	It is very unlikely any part of Crossrail 2 will come into effect in the timescale of this plan and so including developments related to it seems somewhat irresponsible	The Plan has been revised to reflect lack of progress on Crossrail 2	Yes
Theresa Villiers	Section 4.24	Whilst supportive of Council's aim to provide better sports facilities it is important to balance the needs of sports users and other residents for general recreation.	We welcome this support. GSS13 and ECC04 seek to optimise the benefits of open space and a greener Barnet that will allow for recreational use by residents as well as active travel and healthy lifestyle.	No
Canal & River Trust	Section 4.24	Pleased to note that the Welsh Harp is identified as a visitor destination and will be subject to a further Visitor Destinations Study. The Trust is currently looking further at the potential to improve the reservoir as a destination and would be pleased to work with LB Barnet as part of this, have been looking at similar opportunities in collaboration with LB Brent and it would be useful to coordinate these. Would welcome further discussions about the designation of a conservation area across the Brent Reservoir (Welsh Harp) area. Formal designation would help develop and define a sense of place and enable more robust protection for the reservoir. Developments would be required to demonstrate that they respond positively to its significance.	Support welcomed.	No

Friends of Finchley Way Open Space	Section 4.24	Copthall playing fields and Sunny Hill Park. Support the development of this area as a major recreational centre. It must be acknowledged that outside London cars remain the main mode of transport. Copthall is easily accessible from the M1, A1 and the North Circular by road. However, this requires parking on site. As a national centre for sport, especially young people's swimming galas and other events, access is crucial to its success. Day-to-day usage will drop and major events will relocate if public transport and parking is inadequate.	The Council refers to previous responses about need for such facilities to be accessible	No
Mayor of London	Section 4.3	The Mayor welcomes Barnet's commitment to deliver 46,000 homes over the 15-year plan period (2021 to 2036) which equates to 3,066 homes a year. This is in excess of its Intend to Publish London Plan 10-year net housing completions target of 23,640 homes between 2019 and 2028. Of this Intend to Publish London Plan target, 4,340 completions should be identified from small sites. In this regard, the Mayor welcomes the acknowledgement that 5,100 homes in Barnet will come from small sites. With regards to the delivery of small sites, the Panel Report specifically states that the small sites target in the London Plan can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect as required by paragraph 70 of the National Planning Policy Framework of 2019. While Barnet's Local Plan needs to consider the National Planning Policy Framework 2019, the Planning Practice Guidance (Paragraph: 013 Reference ID: 2a-013-20190220) is clear that where a spatial development strategy has been prepared by the Mayor, it is for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area. Barnet's housing target is set out in the London Plan. Barnet's 10-year housing target is based on the borough's capacity as set out in the London Strategic Housing Land Availability Assessment 2017, which Barnet fed into; and a methodology for small sites. The Mayor is working with Barnet and other London Boroughs to deliver transport improvements that were not considered as part of the SHLAA process. The Mayor supports further work to assess whether additional homes and jobs could be brought forward as a result of these transport improvements, subject to no significant conflicts with other policies in the London Plan.	Agreed. Revisions to the Reg 19 clarify the contribution that small sites will make to the housing target. The Council looks forward to working with the Mayor on delivering transport improvements.	yes
St William Homes LLP	Section 4.3	The draft Barnet Local Plan indicates that the Housing Trajectory (Figure 3) reflects the housing target in the 2016 London Plan and makes it clear that this will be updated when the London Plan is published; however, Table 4 indicates a draft London Plan (2017) figure of 3,134, which is more than the targets noted in Barnet's draft policy. The latest version of the London Plan (Intend to Publish version December 2019) (ItP), sets a 10 years target for Barnet of 4,340. By Regulation 19, the new London Plan should be adopted and Barnet's housing targets will need to confirm to a higher housing target. We also express serious concerns that the plan would be unable to deliver the 46,000 dwellings which it currently plans for and the plan would fail to deliver a suitable provision of housing during the early years of the plan period.	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable Barnet's Local Plan needs to be in general conformity with the replacement London Plan.	No
Mill Hill Missionaries (Knight Frank)	Section 4.3	It is our recommendation that the SHMA figure (3,060 dpa / 30,600 homes in total) is used as a minimum figure. However, in light of the Secretary of State's response to the 'Intend to Publish' London Plan published 13th March 2020, it is recommended that Barnet's housing figure is commensurately increased to show how it has endeavoured to accommodate an element of the circa 140,000 unmet need. A recommended starting point would be for the Council to first focus on its own unmet need of 7,700 dwellings over the 10-year London Plan period.	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable	No
Developing London Ltd	Section 4.3	The Consultation document is clear that at this stage, insufficient sites have been identified to ensure housing needs can be met over the entirety of the Plan period. Furthermore, there is a clear need for additional social and green infrastructure which will only become more pressing as the Plan progresses. It is, therefore, in the interests of proper planning that sites in the green belt are considered to accommodate the identified need.	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable	No

St William Homes LLP	Section 4.3	<p>The draft Plan's target to deliver a minimum of 46,000 new homes between 2021 and 2036 as stated in draft policy BSS01 'Spatial Strategy for Barnet' and Table 4, equates to 3,060 homes per annum. This figure is based on the Barnet SHMA 2018, which did not follow the Government's standard methodology for calculating local housing need as introduced by MHCLG. Paragraph 60 of the NPPF (2019) states that '<i>strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach.....In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.</i>'</p> <p><i>9. Figures published in February 2019 show that application of MHCLG Standard methodology would increase Barnet's minimum housing requirement to 4,126, an increase of 1,066 new homes per annum. In order to be found 'sound' at Examination stage, the Local Plan needs to accord to the NPPF to demonstrate that it has been positively prepared and is justifiable and therefore should adopt the 'standard methodology' approach to calculating housing need.</i></p>	<p>The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable</p> <p>Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.</p>	No
Whetstone Properties Ltd (Simply Planning)	Section 4.3	<p>We consider that the Green Belt review undertaken to date has been completed through the blinkered lens that the minimum housing need for the borough is the figure of 46,000 provided by in Barnet SHMA, which has resulted in a significantly depressed housing need compared to the Standard Methodology. Based on this dampened housing need, the Council has failed to fully consider and assess whether the requirements of paragraphs 136 & 137 of the NPPF have been met and if exceptional circumstances exist for the release of Green Belt Land. In addition, this needs to be considered in the context of the Panel Report / Recommendations and Letters from the Secretary of State, which requires the Mayor to undertake an immediate full review of the Green Belt and London Plan to determine if any suitable sites exist for release. This is highly likely to be required, given the panel's conclusions on the ability for London to meet the minimum housing need using the Standard Methodology using existing land capacity. Therefore, the London Borough of Barnet should be proactively undertaking the same assessment, to ensure the soundness of its plan.</p>	<p>The Green Belt study was carried out in accordance with the NPPF and within the framework provided by the London Plan. The draft Local Plan demonstrates how Barnet will accommodate growth through Policies BSS01 and GSS01. As such, the review does not support making the case needed to demonstrate that exceptional circumstances exist sufficiently to justify making revisions to the existing Green Belt and MOL boundaries. Barnet's Green Belt Study will help inform any future London wide review led by the Mayor. Any revisions to Green Belt / MOL made through the next review of the London Plan will be reflected in the Local Plan after this.</p>	No
Mill Hill Missionaries	Section 4.3	<p>This target of 3,060 should be applied over the 10-year target instead as a minimum target – thereby resulting in a minimum of 30,600 homes in total between 2019/20 and 2028/29.</p>	<p>The NPPF sets out that strategic policies should be prepared over a minimum 15 year period. Local planning authorities must review local plans at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.</p>	No
LB Barnet Estates	Section 4.4	<p>This section should include and emphasise the economic contribution Higher Education makes to the local and London economy. The sector provides jobs and employment for caretakers, gardeners, residential wardens, cleaners, receptionists and maintenance workers as well as skilled staff including professors, lecturers, researchers, librarians, administrators and I.T technicians. Universities purchase goods and services from other sectors which stimulates employment in other parts of the local economy. We propose that the following para is inserted at 4.4.5: "The provision of higher education and research makes a major contribution to Barnet's local economy and is also a source of direct and indirect employment supporting local businesses and providing residents with employment. The Council will support providers of further and higher education by encouraging new and improved facilities such as those proposed at Middlesex University's Hendon campus and wider Hendon Regeneration Project".</p>	Agreed	Yes

Friends of Finchley Way Open Space	Section 4.4	Support the need for town centres to diversify away from concentration on retail.	The Council welcomes this support	no
Middlesex University (Tibbalds Planning)	Section 4.4	Outlines growth plans in relation to jobs and the economy. At present it does not acknowledge the importance of the existing further and higher education sector establishments to the economy of Barnet, as providers of direct and indirect employment, as well as providing educational, training, CPD and business support services to local residents and employers. The University suggests adding a new paragraph after 4.4.4 which states: <i>“The provision of higher education and research makes a major contribution to Barnet’s local economy and is also a source of direct and indirect employment supporting local businesses and providing residents with employment. The Council will support providers of further and higher education by encouraging new and improved facilities such as those proposed at Middlesex University’s Hendon campus and wider Hendon Regeneration Project”</i> .	While it is acknowledged that Middlesex University is an important employer in the Borough in a range of skilled and unskilled job this section of the Local Plan is aimed at attracting jobs into the Borough into the proposed Growth Areas and Town Centres.	yes
Friends of Finchley Way Open Space	Section 4.5	While very much support expansion of open spaces and outdoor sports and recreational facilities, it is important to improve access by ensuring sufficient car parking spaces and frequent public transport services from transport and housing hubs. There is no bus from Finchley Central to Cophall or the North London Leisure Park. Many activities offered by GLL serve a wide geographical area and are targeted at older people who are likely to find it difficult to access Cophall by current public transport. (para 4.5.1)	In order for such new facilities to be successful the locations have to be accessible. The Plan promotes this accessibility.	No
Brent Cross South Partnership	Section 4.5	The identified hubs should not preclude other health/sporting/leisure opportunities coming forward. We suggest the following text is added to the end of para 4.5.2 “...and will support other initiatives elsewhere in the Borough, such as at Brent Cross where improvements will be delivered to sporting and leisure facilities within Clitterhouse Playing Fields”.	There is no need to make specific references to improvements elsewhere	No
Brent Cross South Partnership	Section 4.7	Further clarity is needed on the relationship between London Plan designated Opportunity Areas, Barnet Growth Areas, and “Opportunity Sites”. Brent Cross/Cricklewood is an identified Opportunity Area within the draft London Plan and the objectives of draft London Plan policy SD1 part B should be explicitly recognised.	Agreed. This has been clarified elsewhere in the Reg 19	Yes
Brent Cross South Partnership	Section 4.8	Brent Cross South Limited Partnership (‘BXS LP’) is bringing forward the comprehensive development of the Brent Cross South part of the Brent Cross Growth Area as identified and allocated within the Draft Local Plan pursuant to an outline planning permission (ref. F/04687/13) for Brent Cross Cricklewood (‘BXC’). Overall, the Draft Local Plan is well written and helpful in providing updated policy objectives and direction for the Borough up to 2036. We welcome the importance attached to realising the comprehensive development of the Brent Cross Growth Area. The Growth Area, and in particular Brent Cross South, is capable of delivering very significant regeneration benefits and making a substantial contribution to Borough targets for new homes and jobs. We are aware of the letter from Secretary of State for Housing, Communities and Local Government to the Mayor of London dated 13 March 2020, which calls into question elements of the draft London Plan. In light of that letter and as noted below, it is important to ensure that the Borough’s growth areas can be fully optimised.	Agreed. The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable	No
Brent Cross South Partnership	Section 4.8	In line with the draft London Plan, the ability to optimise and intensify sites, and housing delivery within them, is key: further intensification should be supported, where possible. A number of growth areas sit in close proximity to the Brent Cross Growth Area, namely Brent Cross West Growth Area and Cricklewood Growth Area, as well as Staples Corner Growth Area (in LB Brent). This should be recognised within the Draft Local Plan and, where feasible, links and co-ordination between these neighbouring areas of change promoted. Terminology and references to ‘Brent Cross’ within the Draft Local Plan need to be consistent and clear (and defined): references to ‘Brent Cross’ should, in our view, mean the wider Brent Cross Cricklewood area.	Agreed. This has been clarified throughout the Reg 19 document.	Yes
Brent Cross Dev Partners	Section 4.8	The DPs own the Brent Cross Shopping Centre which was the first large enclosed shopping centre to be built in the UK and set a new standard for destination shopping. The centre remains an iconic retail	The Reg 19 recognises the critical importance of BXC to the Borough and the wider sub-region	No

		and leisure destinations with a forty-year history serving North London. The DPs also own the Brent South Shopping Park which is situated to the south of the Shopping Centre across the A406. The DPs have been working with LBB for a significant number of years to progress the redevelopment of these sites to assist in the regeneration of the wider area. Planning (Ref No C/17559/08) for the comprehensive redevelopment of the BXC Regeneration Area was granted in Oct. 2010, and following this, a Section 73 permission (Ref No F/04687/13) was granted by the Council in July 2014 ("2014 Permission"). The regeneration of BXC will realise the Mayor's long-term aspirations for this key strategic Opportunity Area. The development will bring some 27,000 jobs, 7,500 new homes, a new town centre, a new commercial district and a new high street together with parkland and open space. The plans will also deliver substantial investment into transport and community facilities, including new schools, health facilities, public transport interchanges, bridges and road junctions. Since the 2014 Permission was secured, significant progress has been made to date in securing the necessary planning consents. In respect of Brent Cross London (land around Brent Cross Shopping Centre and surface car parks) and associated infrastructure, the DPs have obtained approval for the detailed design for both Phase 1A (North) and Phase 1B (North) and have discharged a large number of pre-commencement conditions. In addition, in December 2017, the Secretary of State approved the CPO's for parts of both the northern and the southern areas of the development. In spite of this progress, the UK retail market has been experiencing major structural and conceptual changes with the closure and consolidation of major national stores and brands. Most significant amongst these is the substantial and continuing move from shop-based retail purchases to on-line retail. Given the continued economic uncertainty a sufficiently flexible planning policy context is required to ensure that a successful and sustainable scheme can be delivered. The DPs have been working with the Council for over two decades to deliver a scheme which will provide the Borough with the regeneration that it requires. The regeneration of BXC is critical not only to future success of the local area but also to North London. It is therefore important that emerging policy context does not limit the ability to deliver the comprehensive redevelopment of the area and constrain the wider economic benefit to the local area and beyond.		
Chris Carabine	Section 4.8	The plans for Brent Cross Growth Area boast retail space and assumed employment when retailers are suffering substantially from internet retailer competition. These plans were made 11 years ago when the demand for retail space was higher and I fear they will not contribute substantially to the growing employment needs.	The Reg 19 recognises the critical importance of BXC to the Borough and the wider sub-region. Given the continued economic uncertainty a sufficiently flexible planning policy context is required to ensure that a successful and sustainable scheme can be delivered.	No
LB Enfield	Section 4.8	At this stage, Enfield Council also requests confirmation from Barnet Council as to whether there any other identified unmet needs that would require a formal request under the requirements of Duty to Cooperate.	There are no other unmet needs identified. This will be reflected in our Statement of Common Ground with LB Enfield.	No
Friends of Finchley Way Open Space	Sections 4.7 to 4.11	The focus of growth around the western areas of the Borough that are already being developed seems sensible in the light of limited resources, especially labour and skills. Brent Cross north (4.9)/Brent Cross south (4.10)/Brent Cross Thameslink (4.11). Support the development of new and better transport infrastructure.	Support welcomed.	No
Brent Cross South Partnership (DP9)	Para 4.10.1	The final sentence of this paragraph should be amended: "The Section 73 planning permission for Brent Cross includes requirements for the new homes to be supported by new and improved schools, community, health and leisure facilities, as well as, improved parks and open spaces."	Agreed	Yes
Brent Cross South Partnership (DP9)	Para 4.10.1	As per the comments on policy GSS01 above, the new homes figure to be provided at BXS should allow for optimisation. We also suggest additional text to state that new homes should comprise different types and forms of accommodation to meet needs and to assist with speed of delivery. The final sentence of this paragraph should be amended: "The Section 73 planning permission for Brent Cross includes requirements for the new homes to be supported by new and improved schools, community, health and leisure facilities, as well as, improved parks and open spaces."	The Plan supports different types and forms of homes so an explicit reference is not merited. Similarly with optimisation	No

Brent Cross South Partnership (DP9)	Para 4.10.2	Opportunities for optimising land and increasing site capacity should be supported	These are supported throughout the Local Plan	No
Former MHNF	Para 4.11.1	Brent Cross Thameslink. We question the proposed location of the new station at 'Brent Cross West'. The distance of both this station and the existing station Brent Cross (Northern Line) is too far distant from the main shopping centre to be of real use to shoppers, particularly those who are carrying heavy bags of shopping. We are also astonished at the sum to be spent on this development £416.5m! This sum, or at least a good part of it, should be used on much needed orbital transport projects across north-west London. We are also keen to see delivery of passenger journeys via the freight line at Dudden Hill through to west London.	A framework for the Brent Cross West area will be progressed. Local Plan Reg 19 reflects progress on the Station and the West London Orbital.	No
Finchley Society	Para 4.12	Brent Cross is a major shopping destination for many Finchley residents and support continued use of the existing Brent Cross facilities as a destination shopping and leisure centre for local residents and those from further afield. However, in keeping with the need to reduce car journeys, developments in Finchley's town centres should allow for improved local retail offers for Finchley residents.	The Council considers that the policy framework in the Plan will support an improved offer for all town centres	No
Former MHNF	Para 4.12.2	We agree heartily with the comments here. We have stated this repeatedly.	Support welcomed.	No
Former MHNF	Para 4.12.3	We question whether 'larger, more dominant centres' will continue to be the focus for activity for consumers and tenants. A mixed-use approach would seem to be preferential, complemented by the smaller centres providing more niche and everyday needs. Our reasoning has already been stated above. Mind the 'Gap' quoted here. Does it really exist in 2020, and even more so in the Plan period?	The Plan recognises the changing nature of retail, particularly in response to COVID19, and encourages an appropriate mix of uses.	No
Former MHNF	Para 4.12.4	Following the points raised above we again question the enormous expansion of Brent Cross.	The successful regeneration of Brent Cross will ensure it remains a major shopping and leisure destination.	No
Brent Cross South Partnership (DP9)	Para 4.12.6	The first residential completions should be stated as 2022/2023 (not 2021/2022).	Agreed	Yes
Friends of Finchley Way Open Space	Para 4.13.3	Look forward to seeing and commenting on the indicators and milestones Barnet is developing to monitor progress on the Brent Cross Growth Area.	These indicators are set out in the Reg 19	Yes
Brent Cross South Partnership (DP9)	Para 4.14.6	This paragraph should be clarified as follows: "The existing strategic highway network in the area is already congested with the junction between the A406 and the A5 at Staples Corner at capacity at peak times." It should also be recognised that there may be alternative mitigation measures (e.g. public transport enhancements) to enable housing delivery.	Agreed	Yes
LB Brent	Para 4.14.7	The Brent Cross West Growth Area adjoins the Staples Corner Strategic Industrial Location in LB Brent which is identified in the Brent Local Plan as a growth area for industrial intensification and potential housing delivery. The Council welcomes Barnet's recognition of the capacity for positive changes to the wider area, the potential of which is also identified within the emerging draft Brent Local Plan.	A framework for the Brent Cross West area will be progressed and we look forward to working with LB Brent on producing this. This will be reflected in our Statement of Common Ground with LB Brent	No
Middlesex University (Tibbalds Planning)	Para 4.17.7	Additional bullet point : "Comprehensive redevelopment of Middlesex University's Platt Hall and Writtle House site".	Agreed	Yes
Geoffrey Silver	Para 4.18.1 Site 49	Section 4.18.1 "identifies Mill Hill East as an area for intensification ... defined as typically built up with good public transport", but the Watch Tower Site 49 is hardly built up and has a low PTAL of 1b. Site 49 is completely unsuitable for intensification.	Any future development proposals for Site 49 will be required to carefully consider its suburban semi-rural character, the Green Belt and Conservation Area status in line with the relevant policies contained within the plan	No

Former MHNF	Para 4.18.4 & Policy GSS07	<p>It is a great shame that the build out of Millbrook Park has taken so long, while residents around it suffer from living in a building site. Delivery of only 600 homes since 2009 is a great disappointment. The constant upheaval for local people is extremely tiresome. Those who have moved into Millbrook Park are experiencing a shortage of car parking provision, leasehold restrictions and issues with site managers on a daily basis. They are generally not happy. Barnet should have a Code of Construction Practice, similar to that in place at the Royal Borough of Kensington & Chelsea. The London Atmospheric Emissions Inventory 2013 estimated that total emissions from Non-Road Mobile Machinery, comprising emissions from construction and industrial off-road machines combined, was responsible for 10.0% of PM2.5 emissions generated within the City of Westminster in 2013 and will be 5.7% in 2020. This makes it the third and fourth largest source of such pollution in 2013 and 2020 respectively. It is difficult to see where an additional 1400 new homes will come from. We assume the NIMR site with currently 514 homes approved is included. It will be interesting to see TfL's detailed plans for 127 homes to be built around its station. It is vital that such a development does not remove the potential for expansion of the station to deliver additional train service capacity or indeed a future through line to Mill Hill Broadway and Edgware.</p> <p>The latest planning application for IBSA House is for 197 homes (19/6551/FUL) but may not get approved at that level. It is however likely to be more than the 125 quoted at Site 46. Then site 49 the Watchtower could be 219 as stated. We await detailed plans but are mindful that it is in Green Belt and in beautifully landscaped gardens, on a steep hill, which would make the site very challenging particularly for the disabled. We are still 350+ under the 1400 suggested. Where do you see those being provided? We note that the maisonettes on Bittacy Hill (uphill from Sanders Lane) are close to their end of life and expect that their regeneration could be included in your assessment. Are these properties Council (or Barnet Homes) owned? A planning framework for Mill Hill East was established with the MHEAAP and this should be updated into a masterplan for the whole area, notably fully assessing the transport and other infrastructure necessities of the combined area.</p>	<p>The Local Plan sets out an ambitious growth strategy for the borough, with a large number of new homes projected over the plan period up to 2036. Development and intensification are aimed at areas within the Borough able to accommodate it and with appropriate character to absorb new more dense building typologies.</p> <p>Any future development proposals for this site will be required to carefully consider its suburban semi-rural character, the Green Belt and Conservation Area status in line with the relevant policies contained within the plan.</p>	No
Finchley Society	Para 4.19.2	This paragraph should admit that with residential development in town centres there are inevitably problems with noise and absence of amenity space.	Agreed. Reference has been made to the need to address these issues as part of town centre living.	Yes
Finchley Society	Para 4.19.5	Welcome this recognition that dependence on the car can and should be reduced.	The Council welcomes this support	No
Clive and Gill Hailey	Para 4.2.1	Agree that "New housing ... must be accompanied by suitable supporting infrastructure including transport, schools, healthcare and open spaces" and that this needs to be addressed before and in conjunction with starting building, not after!	The system is based on contributions from implemented development funding the infrastructure rather than before it.	No
Former MHNF	Para 4.2.2	We agree strongly with the aims of 4.2.2 We would like some objective standard to be adopted in respect of 'character, design and heritage'. (See 'Living with Beauty' document issued January 2020, by the Building Better, Building Beautifully Commission).	The Council welcomes this support. The Reg 19 references the work of the BBBBC.	No
Clive and Gill Hailey	Para 4.2.3	Agree that "Growth must be beneficial for existing and future Barnet residents" but concerned how this is to be reliably measured and quantified.	Monitoring Indicators are set out in Chapter 12. The Council publishes an Authorities Monitoring Report and Regeneration Report every year. These two documents set out measurements of growth	No
TfL	Para 4.20.11	We support the redevelopment of station car parking to deliver growth and as part of a shift towards sustainable travel. The Intend-to-Publish London Plan sets that car-free development should be the starting point in all well-connected locations, and that provision should reflect the new approach and not exceed this based on previous provision. Any station car parking retained must therefore be assessed against the same test proposals for a new station with a car park would be subject to. Where there is sufficient bus access to the rail lines in question, we strongly urge the Council to support the reduction in commuter car parking as part of redevelopment at stations.	Our approach on the development of surface car parks is set out in GSS12. Our approach on car-free development is set out in TRC03. These policies will help the Council to make informed decisions on proposals involving station redevelopment.	No

Theresa Villiers	Para 4.20.11	Concerned at the suggestion that station car parks, such as Woodside Park, should be used for residential purposes. Note that the council envisages re-providing car parking spaces in a different way (presumably by basement or multi-storey car parks) but retention of parking spaces at stations is very important.	Our approach to the redevelopment of station car parks is based on a combination of Policies GSS12 and TRC03. These policies will help the Council to make informed decisions on proposals involving station redevelopment and the extent to which parking spaces are re-provided..	No
Finchley Society	Para 4.20.11	Support this.	The Council welcomes this support	No
Former MHNF	Para 4.20.11	Only zero-emission vehicles should be permitted in the Undercroft beside Mill Hill Broadway main railway line. Noxious emissions are 150% over acceptable targets. Consideration must be given urgently to the construction of a multi storey car park in Bunns Lane close to the station. This will also encourage a reduction in car use by travellers going into central London. Together with Step-Free Access, increased numbers of passengers will then start to use main rail line connectivity from the areas of Mill Hill, Burnt Oak and Edgware. This is a key objective for the Forum. (Site 33) We see that the provision of adequate car parking spaces in centres that the public visit is extremely important if they are to "thrive". While parking has been limited in new developments, (many say unreasonably and unrealistically) almost NO EXTRA PROVISION has been made available at railway stations, and town centres to meet the needs of the extra residents. While we understand the hope from public offices that people will reduce their dependency on the private car, a massive deficit currently exists in parking provision at these public places, thus having the opposite effect. At the end of September 2019, there were (according to the RAC) 38.9 million licensed vehicles in Great Britain, a 1.3 per cent increase compared to September 2018. The level of growth has declined, due to the economic uncertainty, and improved reliability, rather than because people are finding other forms of transport. We see TfL desperate to develop housing on car parks at stations to repair their finances, and while some developments may be of benefit locally, they must not come forward without adequate re-provisioning of car parking spaces. This would be a highly retrograde step, making the use of public transport for many totally untenable. Further initiatives to encourage greater use of public transport, walking or cycling, may reduce the number of car journeys but, they are unlikely, at least in the short term, to reduce car ownership!	When car parks are re-developed we will not seek a increase in spaces. The Local Plan endorses a greater range of sustainable transport options and a modal shift to reduce car travel, which will include the Healthy Streets approach to reduce car dominance and improve street safety, comfort and amenity to promote walking and cycling. This approach is supported by the Car Parking Study, Long Term Transport Strategy and the Sustainable Transport Assessment	No
Finchley Society	Para 4.20.12	Support and urge the Council to give priority to the preparation of planning briefs, to ensure that the public interest is considered ahead of the private interests of landowners and developers. We note the lack of framework documents, such as site briefs, for the Finchley Central TfL development and are concerned that this development not in keeping with this draft Local Plan.	The Council will continue to consider opportunities for more detailed planning frameworks within the parameters of a reformed planning system	No
Friends of Finchley Way Open Space	Para 4.20.13	I'm not sure that Woodside Park can support further development around the station. (para 4.20.13)	The Local Plan supports development in locations with good public transport access.	No
Finchley Society	Para 4.20.13	While Woodside Park station is not located within North Finchley Town Centre, it is an integral part of the Centre's infrastructure. Priority should be given to improving the link between the station and areas along the High Road, through much more frequent bus services from the station (utilising low-emission vehicles).	The relationship between Woodside Park and North Finchley Town Centre was highlighted in the 2018 SPD. Agree that the pedestrian link should be reflected in Local Plan.	Yes
Barnet Society	Para 4.20.1-6	Crossrail 2 is a very long way off. Shorter-term is the probability that the existing Great Northern local service between Moorgate and Welwyn Garden City will be taken over by TfL's Overground network. This suggests that the Oyster facility will be extended to stations beyond Hadley Wood. Given line capacity restrictions between Finsbury Park and Moorgate, any increase in local services through Oakleigh Park, New Barnet, etc. would be best achieved by extending Crossrail 2 journeys north of New Southgate. In turn, this would help boost New Barnet as a retail, employment and residential hub.	The Plan has been updated to reflect the prospects for delivery of Crossrail 2	Yes

TfL	Para 4.20.2	Correct the description of the West London Orbital to say: 'The WLO will deliver a new passenger service along existing tracks between Hounslow/Kew Bridge and Hendon/West Hampstead Thameslink, passing through Old Oak Common, Neasden, Brent Cross West and Cricklewood.'	Agreed.	Yes
Barnet Society	Para 4.21.1-4	Redevelopment of estates needs to facilitate bus access. Through bus routes should be created where possible (with adequate road width) and cul-de-sacs minimised. If necessary, bus stops should be added to keep residents within 400m of a stop.	Penultimate bullet of policy GSS10 refers to needing to demonstrate sufficient access to public transport.	No
Theresa Villiers	Para 4.22.1	Whilst seeing the merit of development along major thoroughfares, proposals for 7 storey development around Whetstone and Chipping Barnet would increase population excessively and add pressure to local infrastructure provision.	Policy CDH04 revised to make clear that definition of a Tall Building and identification of strategic locations where tall buildings may be appropriate does not mean that all buildings up to 8 storeys or to a height of 26 metres are acceptable in these locations or elsewhere in the Borough. Such proposals will be assessed in the context of other planning policies, in particular Policy CDH01 – Promoting High Quality Design, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area	Yes
New Barnet Community Association	Para 4.22.1	Remove A110 East Barnet Road as a major thoroughfare as it is completely out of character from the other routes.	Safeguards are provided through Policy GS11 which will ensure that design relates to suburban streets behind the thoroughfares	No
Clive and Gill Hailey	Para 4.22.1	There have been several recent instances of local developers / planners getting confused by local road numbering and the capacity of said roads! It must be clarified that only the section of East Barnet Road (identified as the A110) can be considered a Major Thoroughfare. To clarify, East Barnet Road through East Barnet Village (from Brookhill Road to Church Hill Road) is not part of the A110 and is not classified as a major thoroughfare.	Safeguards are provided through Policy GS11 which will ensure that design relates to suburban streets behind the thoroughfares	No
Barnet Society	Para 4.22.2	An important aspect of denser development is ensuring that bus flow and bus-stop location is given early attention. Bus lanes can be valuable in congested areas, but there is only limited scope for them in Chipping Barnet. Of greater benefit would be more attention to, and enforcement of, waiting restrictions on one or both sides of bus routes.	Such detailed issues are considered in discussions between Highways colleagues and TfL as part of detailed planning proposals.	No
Former MHNF	Para 4.23	We also note that you barely mention "Air Quality" in most policies in this section. This clearly needs to be addressed in the light of commitments to Carbon Neutral target deadlines.	Proposals are required to meet the air quality measures set out in Policy ECC02.	No
Finchley Society	Para 4.24	This section should include something about those parks which have historic or heritage characteristics or include historic structures. It should also cover golf courses, of which there are nine in Barnet; they take up as much land as all the public parks, and though they are used for sport/recreation, they are not open to the general public.	Agreed in part. Reference made to Barnet's historical parks and gardens.	Yes
Elizabeth Silver	Para 4.24	Change: Cut down on the number of pay-for leisure facilities and remove the words "Ancillary facilities". Specify what "accessibility" means. Add: The main task is maintenance i.e. litter collection and landscape gardening such as mowing of lawn spaces, pruning, tree care, planting shrubs etc. Commercial and organised leisure developments should be discouraged as they discriminate against low-income groups and those who just wish to cycle, run, walk their dog or watch wildlife. This is crucial for the education of the next generation to respect our natural world. Supporting Comments: What is actually needed in these places is litter collection, and landscape gardening such as mowing of lawn spaces, pruning, tree care, planting shrubs etc. not development as described. It is extremely worrying that the accent here is on over-development, such as changing facilities or a BMX/skate park. As soon as one of these has less maintenance, it becomes ugly and derelict, and the space becomes ripe for more building projects. Any building on green space is a precedent for more	The Council aims to provide a range of parks, open spaces and leisure facilities across the borough to suit the needs of all users. ECC04 seeks to optimise the benefits of open space and create more accessible green spaces through a range of measures.	No

		development and compromises the green spaces for future generations. Copthall is a prime example of this. Organised leisure facilities are often associated with litter, as seen in the area around Copthall. Ancillary facilities could be another name for developments. "Appropriate ancillary facilities" should be specified and not be supported if they take the place of green space or increase the amount of concrete or built-on space. All maintenance equipment should be stored off-site as otherwise it will get stolen. This many organised/pay-for recreation facilities conflicts with keeping the area as a natural space (and Welsh Harp is an SSSI), harming wildlife and discouraging walkers, joggers and cyclists. People who enjoy free activities such as walking and cycling, tend to avoid over-developed centres of leisure. Commercial activities discriminate against low-income groups.		
Finchley Society	Para 4.24.2	This study should cover the disbenefits, as well as the benefits, of tourism and look at how the use of properties for short-term visitor accommodation (such as Airbnb) may constrain residential availability for local residents. The short-term letting limit of 90 days for whole properties, abuse of which is reportedly widespread, should be much more strongly enforced.	The impact of short stay accommodation is addressed at Policy HOU05 – Efficient Use of Barnet's Housing Stock	No
Mill Hill Preservation Society	Para 4.24.3	Connections to adjacent open spaces Arrandene Open Space, Mill Hill Park is not the case.	This reflects the Copthall masterplan	No
Finchley Society	Para 4.24.3	The Playing Pitch Strategy showed there are 16 adult football pitches not used for playing football, which is unacceptable. If these low-quality pitches cannot be made useful, they should be turned into public parks and greenspace with all-weather paths.	The Playing Pitch Strategy is undergoing review and will update current and future supply and demand assessments for each of the sports being considered	No
Barnet Society	Para 4.24.3	The proposed sport and recreation hub at Barnet Playing Fields comprises a building as big as a small primary school plus a floodlit outdoor games area and parking for 65 cars, right in the middle of playing fields. This would be a flagrant breach of the openness of the Green Belt – and quite unnecessary since other, far less conspicuous (and probably cheaper and more convenient) sites exist close by.	The Council considers there to be a case for very special circumstances to justify the creation of the sports hub in this location..	No
Friends of Finchley Way Open Space	Para 4.24.4	I strongly advise that the assessment system for parks and open spaces is revised. At present too much emphasis is placed on the presence of man-made facilities such as toilets and cafes. If more is to be made of Dollis Brook and the Green Valley Walk, as well as other smaller open spaces, it must be possible to value their contribution to the health and wellbeing of all animals, flora and fauna and not just to humans in assessing their value and quality to society. There is scientific evidence that animals and fish become more aggressive when crowded together. The creation of a hard surface path close to Dollis Brook along the south side of the Finchley Lawn Tennis Club has created flooding of the open area, ruining the flora. Hard surfaces that break-up habitat in this way can be detrimental to wildlife. The provision of toilets often leads to vandalism and cafes to rubbish which can be hazardous when dropped and blown about and even when place in bins has to be collected by the Council. Suggest that the Council explore using an ecosystem services approach to the valuation of open spaces.	The methodology of assessing the value and quality of a park in the Barnet Parks and Open Spaces Strategy was about much more than just parks facilities.	No
Canal & River Trust	Para 4.24.4	Note the aims to maximise the access to and potential of the key river valleys throughout Barnet namely Dollis Brook, Pymmes Brook and Silk Stream to support leisure, recreation and active travel. Pymmes Brook eventually feeds into the Lee Navigation, which is owned and managed by the Trust. Misconnections and other pollution entering Pymmes Brook can end up in the Lee Navigation, adversely affecting its water quality. We therefore support enhancement of these waterways, in addition to public access, recreation and active travel, as described in paragraph 4.24.4. However, the Trust only owns the Silk Stream between the Brent Reservoir and the A5.	Support welcomed and details of ownership noted.	No
Finchley Society	Para 4.24.4	The assessment system for parks and open spaces must be revised. There is currently too much emphasis on man-made facilities such as toilets and cafés. it should be possible to value the contribution of open spaces to the health and wellbeing of all animals and plants, not just humans. There is scientific evidence that animals and fish become more aggressive when crowded together. The hard surface path close to Dollis Brook along the south side of the Lawn Tennis Club has created	The Council is preparing a Sustainability Strategy and is committed to producing a Biodiversity Action Plan. These issues are best addressed through these policy vehicles.	No

		flooding of the open area, ruining the flora. Hard surfaces that break-up habitat in this way can be detrimental to wildlife. The provision of toilets often leads to vandalism, and cafés to rubbish which can be hazardous when dropped and blown about and even when placed in bins has to be collected by the Council. The Council should explore using an ecosystem services approach to the valuation of open spaces.		
Brent Cross South Partnership (DP9)	Para 4.24.4 and GSS13	Should recognise the contribution of Clitterhouse Playing Fields by specific reference, e.g. by adding a further sub-paragraph (e) to para 4.24.4, "improvements to Clitterhouse Playing Fields to enhance sporting and outdoor recreational facilities".	Agreed. Reference made.	Yes
Clive and Gill Hailey	Para 4.24.4 d)	Maximising the potential of the Pymmes Brook key river valley to support free leisure and recreational activities may have benefits but must be carefully controlled to maximise public use and access and to limit any commercialisation. However, 'active travel' along the Pymmes Brook Trail cycle route through Oak Hill Park could be extremely difficult to introduce without resulting in conflict with other park users' enjoyment. The problems experienced with the Dollis Valley Green Walk should be well remembered and not repeated.	There is no specific reference to the cycle route in the Local Plan	No
Finchley Society	Para 4.24.4b	No justification for the exclusion of Victoria Park, Cherry Tree Woods, and Avenue House grounds. Either produce a complete list or do not mention any specific parks.	This list largely reflects the contents of the Parks and Open Spaces Strategy and is not intended to set out all improvements	Yes
Barnet CCG	Para 4.3	Increased level of housing growth will require significant investment in social infrastructure, including healthcare which should be mentioned in this section on Barnet's Growth Requirements.	Chapter 8 reference and provide details on healthcare infrastructure provision requirements.	No
Brent Cross Dev Partners (QUOD)	Para 4.3	Para 4.3 outlines Barnet's growth requirements in respect of housing. It is noted that the Council are awaiting the final publication of the New London Plan and confirmation of the housing target. As such, Barnet's Housing Trajectory has been based on the housing target identified in the 2016 London Plan. The Council acknowledge that the Housing Trajectory will need to be updated when the London Plan is published. The DPs would like to reinforce this approach, and note that these updates, as well as any consequential updates required to other housing policies will be essential to ensure that the Local Plan complies with the New London Plan.	The housing trajectory is subject to annual update. A revised version is shown in the Reg 19 Local Plan	Yes
Barnet CCG	Para 4.3	It is noted that the green, social and physical infrastructure needed to support Barnet's growth will be set out in an Infrastructure Delivery Plan (IDP). The CCG will continue to work with the Council to identify future healthcare infrastructure requirements as part of the IDP.	The IDP has been published as part of the Local Plan evidence base	No
Home Builders Federation	Para 4.3.5	The Draft London Plan Intend to Publish version requires Barnet to provide 23,640 net additional homes between 2019/20 and 2028/29, or an annual average of 2,364. We note that the Council has referred to the sub-regional West London Alliance SHMA. This establishes an OAN for Barnet of 3,060 dpa. We acknowledge and welcome the Council's ambition to go further than the minimum targets in the Draft London Plan, although whether it has the deliverable land capacity to support this is another matter (we consider this below). We advise that the Council should use the figure of 3,060 as the basis for a ten-year plan rather than 15 years. This would require the plan to provide for 30,600 homes in total between 2019/20 and 2028/29 rather than 46,000 over 15 years. The Council's intention to deliver in excess of the minimum Draft London Plan target is supported by the Secretary of State's directed change number 8, with its modification to para. 0.0.21.	This Plan needs to be in general conformity with the London Plan. The Mayor has not raised an issue about the 15 year timeframe of Barnet's Local Plan.	No
Finchley Society	Para 4.3.6	Both the adverse and the beneficial consequences of so large a figure should be addressed.	This is addressed at Policy BSS01	No
Barnet Society	Para 4.3.6	Agree with FORAB that the target of 46,000 new homes is unrealistically ambitious.	This target has been revised with that of the London Plan	Yes
Clive and Gill Hailey	Para 4.4.1	The lack of adequate cross borough public transportation links mean that any new jobs created are really only for the benefit of those living within the same locality. This makes little or no sense.	Improvements to orbital transport links will improve job access opportunities within Barnet and the wider sub-region	No

Former MHNH	Para 4.4.1	We have questioned these assumptions earlier, both for retail and office space and therefore the number of new jobs to be generated, 27,000.	The Plan recognises the changing nature of retail and encourages an appropriate mix of uses.	No
Finchley Society	Para 4.4.1	Barnet is not an island, and therefore the desirability of having the employment in Barnet needs justifying.	Through safeguarding and supporting new employment floorspace Barnet is making a contribution to the overall economy of London	No
Clive and Gill Hailey	Para 4.4.2	The statement "efforts should be focused on protecting employment land" is admirable, if it were to result in generating and retaining local employment but such suitable areas are scarce and how can such protection be assured and implemented?	The Plan sets out a strong message on safeguarding employment land. This is backed up by the recent Article 4 on office to residential uses.	No
Redrow Homes	Para 4.4.3	Allow for potential of co-location of uses, including residential on certain Locally Significant Industrial Sites.	As part of the safeguarding of employment land co-location is not supported. This reflects the Intend to Publish London Plan (policies E6 and E7).	No
Brent Cross Dev Partners (QUOD)	Para 4.4.4	The DPs support the Council's recognition of the changing trends within the retail sector and the need for town centre's to diversity. We would request that this approach to diversification should be taken forward and reflected in the relevant policies. This is to ensure the planning policies are positively prepared in accordance with the provisions of the NPPF.	The Plan has been revised as part of the response to COVID19 and the need to support thriving town centres.	Yes
Finchley Society	Para 4.4.4	Given the negative trends in the UK retail sector, it is hard to believe that Barnet needs any additional comparison retail space. If the Council intends to allow new high-quality retail space in certain locations, it should have a clear policy on what to do with surplus space elsewhere. The realities of retail property are harsh, and the language here is too vague. Include the sentence: "In light of the adverse trends in the UK retail property market, the Council will need to address and encourage alternative uses for a growing amount of vacant retail space, particularly low-quality space and that located in marginal areas."	Targets for retail floorspace have been deleted	Yes
Brent Cross South Partnership (DP9)	Para 4.4.4 and 4.8.4	As noted above, the Zonal Floorspace Schedule within the Development Specification and Framework of the BXC permission specifies c.110,000m2 of retail and related uses site wide (c.78,000m2 North of the A406 and c.32,000m2 South of the A406). Consented floorspace both within Brent Cross North and South should be recognised as contributing to the town centre.	Text revised to clarify consented floorspace	Yes
Finchley Society	Para 4.5.1	Expansion of open spaces and outdoor sports and recreational facilities is supported, but it is important to improve access with sufficient car parking spaces and frequent public transport services from transport and housing hubs. (There is, for example, no bus from Finchley Central to Copthall or to the North London Leisure Park.) Many older people and young families who use the sports and recreational facilities, while not having a Blue Badge, may find it difficult to use public transport, through e.g. impaired mobility or having with them young children, swimming/football equipment, etc. Many of the activities offered by GLL (aka Better) are targeted at older people, such as body conditioning, yoga and Pilates.	Agreed that facilities such as Copthall can only be successful if they are accessible by a range of transport modes including the car. In supporting and planning for destination hubs it is essential that accessibility forms a fundamental element of proposals. The Great North Leisure Park is a residential led mixed use proposal within the Local Plan where we will seek improvements to public transport accessibility.	No
Friends of Finchley Way Open Space	Para 4.5.3	Support the proposal for a new Regional Park.	Support welcomed.	No
Friends of Finchley Way Open Space	Para 4.6.1	Major transport infrastructure - Is it realistic to include even partial completion of Crossrail 2 in the plan?	Local Plan revised to reflect progress of Crossrail 2	Yes
Brent Cross South Partnership (DP9)	Para 4.6.1	This para references the new Long Term Transport Strategy which "will inform a programme of priority transport investments that will support and address the strategic needs of Barnet". We note that there is parallel consultation process ongoing in relation to the draft Transport Strategy, and this Strategy will be important to informing the infrastructure-related policies moving forward. Further detailed comments may arise on the relevant aspects of the Draft Local Plan once this document is finalised.	Reg 19 has been informed by the Long Term Transport Strategy and the Strategic Transport Assessment	Yes

Clive and Gill Hailey	Para 4.6.1	Nothing works without the provision of a first class and reliable local transport network! Hopefully, the Council's new Long Term Transport Strategy will enlighten us greatly when it is published.	Reg 19 has been informed by the Long Term Transport Strategy and the Strategic Transport Assessment	Yes
Former MHNF	Para 4.6.1	We will respond in due course to the Council's Long-Term Transport Strategy document. This will include questions re additional retail space 55,000m2 at Brent Cross, and the 165,000m2 new retail space. Please see earlier comments on this subject. We need to see trends of footfall and transaction values over the past 10 years at Brent Cross Shopping Centre and at other town centres in order to judge whether a net increase makes sense, and if necessary, by how much.	There remains an extant consent for the regeneration of Brent Cross. Reg 19 has been informed by the Long Term Transport Strategy and the Strategic Transport Assessment s for the regeneration of Brent Cross.	No
Historic England	Para 4.7.2	It is appreciated that Barnet has been allocated an extremely ambitious housing target for the plan period. We therefore welcome the plan's intention to focus growth in specific identified areas, and to ensure development is delivered in a way that responds to the distinctiveness and individual characteristics of these areas to ensure good place making.	The Council welcomes this support.	No
Home Builders Federation	Para 4.7.5	We welcome and strongly support the Council's intention, as articulated in para. 4.7.5, to keep the housing land supply and trajectory under review. This review will help to inform a revision to the Local Plan in five-year's time.	The housing trajectory is updated on an annual basis through the Authorities Monitoring Report	No
Barnet Society	Para 4.7.5, Table 5 & Figure 3	Share FORAB's confusion over the housing figures. In addition, the red line indicates a London Plan annual target of only some 2,300 (whereas Table 4 states 3,134).	Table 5 and Figure 3 have been revised and updated	Yes
Finchley Society	Para 4.8	The Brent Cross plans should be completely revised in light of changes in the economy and the climate emergency. Economic trends are reducing the need for retail floorspace. New large shopping centres may not be commercially viable. Land use in Brent Cross should perhaps now focus on residential development, reducing pressure elsewhere. The climate emergency makes increased car-based shopping unacceptable. This type of shopping has higher emissions compared to using local centres or delivery services. Refurbishment of the existing shopping centres is far more carbon efficient than new construction (as the Council acknowledges elsewhere). Unnecessary driving for comparison shopping also exacerbates traffic congestion. The Council may be able to revise the agreement with developers and move towards a new plan in which the existing shopping centre is refurbished and more land is devoted to residential and community use.	Reg 19 document reflects the extant consent for the regeneration of Brent Cross and its role as a regional destination for retail and leisure	No
Brent Cross South Partnership (DP9)	Para 4.8.1	Note that the comprehensive development of this area will be phased. As referenced elsewhere, the terminology around 'Brent Cross' needs to be clear and consistent throughout the Draft Plan.	Agreed	Yes
Brent Cross South Partnership (DP9)	Para 4.8.2	The new Metropolitan town centre referenced in this paragraph should clearly relate to both north and south of the A406.	Agreed – see GSS02	Yes
Finchley Society	Policy GSS13	The Regional Park has been mentioned for many years. It would be highly desirable for Finchley residents and for Barnet generally. There is however a lack of any specific plans and funding for it. It should either be dropped as a meaningless ambition or made concrete through specific initial steps and investments.	The establishment of a Regional Park is at a very early stage. However it remains an ambition of the Council within the lifetime of the Local Plan.	No
Taylor Wimpey Strategic Land	Policy GS11	Sets out that development along main road corridors as identified on the key diagram (Map 2) is supported subject to a number of criteria. These locations are considered to have the potential to deliver 4,900 new homes. Although the principle of this approach to housing growth is supported, we consider that some key road corridors in the borough that could assist in delivering housing have been missed. .Colney Hatch Lane is a key route through the borough that connects Muswell Hill in the south with Chipping Barnet to the north, and which is intersected by the A406. This area has a PTAL of 3, therefore development along this road would be in a sustainable location. As a result, the inclusion of Colney Hatch Lane would be in accordance with NPPF para 8 which seeks to achieve sustainable	Colney Hatch Lane is not specifically identified in the Local Plan as a main road corridor suitable for infill and intensification. Policies in the Local Plan do not preclude undesignated sites with good PTAL coming forward.	No

		development, including through ensuring that sufficient land of the right types is available in the right places. LBB should therefore amend the key diagram to include Colney Hatch Lane as a major thoroughfare so that it can contribute to the housing proposed to be delivered through this category. The land east of Colney Hatch Lane could contribute to this housing requirement in accordance with the Borough's strategy to deliver sustainable growth.		
Mayor of London	Policy GSS008	Could be misread as the parking standards being minimums – should be made clear that parking provision should be minimised and not exceed standards in Tables 10.3 and 10.5 in Mayor's Plan	Agreed – wording clarified	Yes
Finchley Society	Policy GSS01	Penultimate paragraph - good that the Council will plan pro-actively, but be less mealy-mouthed, and say something that will show the Council means business. 'will be prepared to use' for 'will consider the use of'	Agreed	Yes
TfL (CD)	Policy GSS01	Comfortable with the suggested 1,000 homes capacity for TfL and Network Rail car parks. Suggest it should be a minimum of 1,000 homes.	BSS01 establishes the minimum boroughwide target of 35,460. Table 5 sets out the sources that contribute to delivering that minimum target. Setting the housing unit target as a minimum for each source is unnecessary and reduces flexibility.	No
Brent Cross Dev Partners (QUOD)	Policy GSS01	Relates to sustainable growth and identifies that there will be up to 165,000 m2 (net) of new retail floorspace across the Borough, with "up to 55,000m2 (net) of this at the revitalised Brent Cross Shopping Centre." Whilst the DPs support the inclusion of this reference to retail delivery at Brent Cross London, a non-material amendment Ref No 17/2528/NMA was granted in September 2017 which amended Condition 36.3 attached to the 2014 Permission so that the net additional comparison retail floorspace to be provided in Brent Cross London shall not exceed 56,600sqm of new comparison retail floorspace. The wording within Policy GSS01 and elsewhere in the Draft Local Plan should be updated accordingly. Draft Policy GSS01 also identifies that "The Council will create the conditions for sustainable growth to deliver the homes, jobs, retail floorspace and community facilities to meet Barnet's identified needs." This approach is endorsed by the DPs, however so as to ensure that the Draft Local Plan is positively prepared it is suggested that leisure and entertainment should also be included within the list of Barnet's identified needs.	Agreed -	Yes
LB Haringey	Policy GSS01	Welcomed but would emphasise importance of a robust IDP	IDP published in February 2021. This will be reflected in our Statement of Common Ground	Yes
Environment Agency	Policy GSS01	We support the statement in the policy that infrastructure is key to supporting growth, including investment in transport, education, health and open spaces. However, we'd like to see flood risk, waste water, water supply, and green infrastructure included as part of this statement in the policy. Lack of consistency between GSS01 statement on small sites and the WLA Level 1 SFRA] We recommend you assess where windfall development would be considered acceptable in relation to flood risk in Barnet. A clear position on this helps Development Management teams in their review of planning applications proposed in areas of flood risk, helping to determine whether the Sequential Test requirements are met or not. The Environment Agency can only assist with part (b) of the Exceptions Test, as to whether a site-specific flood risk assessment is acceptable or not.	Reg 19 is supported by the Level 2 SFRA	Yes
Friern Barnet and Whetstone Residents' Association	Policy GSS01	The physical extent of the Opportunity Area should be more precisely identified in the next draft. Depending on that the question of whether the whole of the Area, or just part of it, is potentially suitable for Tall and/or Very tall Buildings will need consideration. Failing that, there is a risk of putting "cart before horse".	New Southgate Opportunity Area is highlighted in the London Plan. The boundaries of the Opportunity Area have not been formally defined but they will cross into LB Enfield and LB Haringey. The Council will be working with the other boroughs and the GLA on creating an area planning framework which will be subject to public consultation. This will provide more detail on appropriate building heights.	No

Taylor Wimpey Strategic Land	Policy GSS01	<p>We note that draft Policy GSS01 sets out that new housing development will be delivered through a number of different components of supply, including growth areas (21,300 homes), district town centres (6,100 homes), existing and major new public transport infrastructure (3,450 homes), estate renewal and infill (4,000 homes), major thoroughfares (4,900 homes) and other large sites including car parks (1,150 homes). In addition to this, it is expected that 5,100 homes will come forward on small sites which are not formally identified. We have a number of concerns with the identified sources of supply which raise doubts as to whether LBB will be able to meet their housing requirement and accord with NPPF para 67 which requires planning policies to “identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”. The following issues should be explored further and where additional evidence cannot be provided to demonstrate that sites are deliverable or developable within the Plan period, these sites should be removed. 1 It appears that there may be some double counting of housing numbers in relation to the growth areas of Cricklewood town centre and Brent Cross West identified under category 1, whereby the stations in these locations have also been included for housing growth under ‘Existing and major new public transport infrastructure’ (category 3). It is not clear which of the sites proposed to be allocated are included under each of the categories and in some cases how the final totals have been calculated. For example, in Cricklewood, only two sites have been identified for a total of 1,139 homes compared to an allocation in draft Policy GSS01 in Cricklewood Town Centre of 1,400 homes. 2 Some of the infrastructure projects listed, which could facilitate housing growth, are not currently confirmed to come forward. As such the timescales for their delivery which could support increased housing delivery in these locations are unknown and it cannot be guaranteed that these sites will viably come forward within the Plan period. This includes both Crossrail 2 and the West London Orbital. The necessary infrastructure to support increased housing in these locations is therefore not evidenced to support the associated allocations. 3 We would also query the deliverability of the small sites provision included. The policy sets out that the number of houses expected from small sites is based on past trends. Significantly in discussing the small sites policy in the London Plan, the Panel report for the New London Plan placed significant doubt on the reliance of small sites available to deliver housing growth in London. In particular, the Panel report sets out that the New London Plan has failed in considering the huge range of factors that could inhibit deliver such as whether sites are available to come forward, land assembly and bringing sites forward quickly and lack of finance. As a result, the Panel recommended a reduction in small sites housing supply. LBB therefore needs to provide a robust evidence base to support its housing supply coming forward from small sites which relies on more than past trends in order to justify this approach. If this cannot be provided, alternative sites should be identified to meet this requirement. The release of land within the Green Belt (GB) and Metropolitan Open Land (MOL) for housing has not been considered on the basis that the exceptional circumstances do not exist for its release under NPPF paragraph 136. However, as noted above, the Panel report on the New London Plan emphasised that a Strategic Green Belt Review of London should be undertaken as soon as possible, and this would feed into a review of the London Plan. In any event, draft London Plan Policy G3 (Metropolitan Open Land) allows for land to be released from MOL in exceptional circumstances, while the SoS’s letter has proposed the removal of the requirement to ensure that the quantum of MOL land is not reduced. Sites which do not meet the objectives of MOL are therefore suitable to be allocated and can support LBB in meeting their housing requirement. It is considered that there are exceptional circumstances to release the site from the MOL. The land to the east of Colney Hatch Lane is one example of MOL land which is suitable to deliver housing. It is a vacant former ILEA playing field site which does not provide any public benefit in terms of useable public open space and recreation as it is not publicly accessible. It has been assessed against the MOL objectives and the following conclusions can be made: • There is no distinguishable link to the MOL to the west (Powerleague site) and there is no public access through the MOL. • The site</p>	<p>The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable</p> <p>The IDP was published in February 2021</p> <p>We refer to previous responses on land at Colney Hatch Lane</p>	No
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		does not provide publicly accessible open space or sports facility. • The site does not contain any feature or landscape of national or metropolitan value or local landscape value. • It does not form part of Barnet's designated Green Chain and would not be able to as it is not publicly accessible and does not include any public footpaths. The Barnet Green Belt and Metropolitan Open Land Study should therefore be reviewed to reassess the boundaries in the context of the housing requirement and the land east of Colney Hatch Lane should be allocated for housing development in the emerging Local Plan.		
Brent Cross South Partnership (DP9)	Policy GSS01	The stated number of residential units in this policy reflect the extant planning permission for Brent Cross Cricklewood, however, the draft London Plan shows an indicative housing capacity for Brent Cross Cricklewood as 9,500 homes. Given the draft London Plan's aspirations for optimising land opportunities and increasing site capacity, we suggest that stated figures allow for optimisation. As noted above, the Zonal Floorspace Schedule within the Development Specification and Framework of the BXC permission specifies c.110,000m2 of retail and related uses site wide (c.78,000m2 North of the A406 and c.32,000m2 South of the A406).	Figure has been changed to be consistent with the London Plan	Yes
Barratt London	Policy GSS01	Broadly support Barnet's approach to its strategic growth objectives and locations and recognition that there will be "other large sites including car parks" coming forward for delivery in addition to the locations identified. West Hendon does form part of Brent Cross and the Estate Renewal and Infill strategic categories. Suggest that the housing targets be expressed as minimums.	Support noted and welcomed. Target figures for new homes are given for each of the 7 areas / categories identified in table 5 and policy GSS01.	No
Barnet CCG	Policy GSS01	This policy and Table 5 and helpfully set out the housing capacity by source / area, for example in Growth Areas. A different pattern of housing growth across the borough will have implications for healthcare infrastructure and may require different approaches to deal with site specific impacts, for example in the six Growth Areas and estate renewal areas and cumulative growth in other areas and on small sites. Understanding the timing of growth is important to identify when investment is needed to provide additional capacity.	Table 5 has been revised	Yes
Clive and Gill Hailey	Policy GSS01	Totally unrealistic and unachievable "targets" being imposed by Central Government and by the Mayor of London in respect of new housing stock, in particular for "affordable" housing - a term that doesn't actually mean anything achievable in most of the affluent areas that comprise the majority of Barnet. Council has to set and stick to a realistic target for the annual number of new units. Summary of possible locations is already scraping the bottom of the barrel in respect of realistic sites that might be made available for housing - some are so poor, small or badly located that the development costs per unit would be untenable. Struggle to identify 67 possible sites with a projection of 16,632 units - far short of the mandated target and in any case, include over 2,000 units already approved.	Not all sites that will deliver housing are included as proposals in the Local Plan. There are also contributions from small sites and through permitted development..	No
Roger Chapman	Policy GSS01	Add new point g) Barnet Wastelands - 1040 – 2600 homes (Policy GSS 14)	The Council refers to its previous response on Barnet Wastelands	No
London Diocesan Fund (Iceni Projects)	Policy GSS01	The Council's current approach to delivering this growth focuses on regenerating and developing areas of brownfield and underused land. The Council are therefore proposing all allocations to be outside the Green Belt or within the built up settlement area, for example seeking to deliver 21,300 homes in 6 Growth Areas across the Borough. Whilst we generally support this approach as a starting point, in its current form it will not ensure that enough housing is delivered in Barnet. As will be explored throughout, releasing Green Belt land will be necessary to; meet housing needs; deliver necessary infrastructure such as schools; and increase affordability while maximising development on brownfield land within the built up settlement area.	The Council refers to previous responses justifying the continued protection of the Green Belt and MOL	No
London Diocesan Fund (Iceni Projects)	Policy GSS01	Brent Cross is Barnet's largest and most significant area of regeneration, identified as an Opportunity Area in the London Plan. This is a large and complex scheme, taking over 20 years to deliver 7,500 homes. The Council highlights that outline planning permission, originally approved in 2010, is now nearly a decade old. While it has flexibility to allow the phasing and delivery sequence of the development to be adjusted, it is expected that it will need to be supplemented through further planning	The Council reviews its housing trajectory on an annual basis. Barnet's second Housing Delivery Action Plan has been published. We refer to previous responses with regard to Green Belt release.	No

		applications to update areas of the masterplan as it evolves and as the development responds to updated market and policy shifts. The Council are yet to publish a housing trajectory; however we anticipate the delivery of the growth areas to be focused or even beyond the plan period. The Council will therefore need to look to allocate additional land to be delivered in the short term and ensure schemes are built out at a rate that accords with the Housing Delivery Test. Barnet achieved 90% of their housing delivery from 2016-2019 and is required to prepare an Action Plan for how the Council plan on increasing their delivery rates. This further supports the argument that the Council will need to increase their delivery and build a buffer rather than expecting these sites to come forward as planned. We consider that Green Belt sites can be brought forward quickly and help meet need in the early part of the Plan Period without the need to rely upon new infrastructure.		
Lansdown	Policy GSS01	Policy GSS01 is both clear and positive in setting out the key priority to ensure development and growth will be achieved sustainably. However, similarly to the previous comments, the exclusion of any green field / Green Belt land from consideration seems problematic. Alternative Option 2, which includes such land in determining the housing target to set, would be more beneficial in meeting the OAN and overcoming the problems that the lower 46,000 homes target may cause. So long as the overarching 'sustainability' target is met, green field / Green Belt land should be considered and reviewed in greater detail than is the case with the current draft. This will increase the housing land supply to meet OAN and still ensure that sustainable areas are developed, with only Green Belt land release causing least harm to the environment being allowed.	The Green Belt study was carried out in accordance with the NPPF and within the framework provided by the London Plan. The draft Local Plan demonstrates how Barnet will accommodate growth through Policies BSS01 and GSS01. As such, the review does not support making the case needed to demonstrate that exceptional circumstances exist sufficiently to justify making revisions to the existing Green Belt and MOL boundaries. Barnet's Green Belt Study will help inform any future London wide review led by the Mayor. Any revisions to Green Belt / MOL made through the next review of the London Plan will be reflected in the Local Plan after this.	No
LB Barnet Estates	Policy GSS01	as currently drafted does not acknowledge contribution of Hendon Regeneration Project in meeting sustainable growth objectives and request that the following paragraph is inserted after (f): <i>"The Hendon Regeneration Project will see the redevelopment of existing Middlesex University and Council owned land and other sites to include; up to 1,405 gross student bedspaces, up to 8,685 gross sqm of University teaching floorspace, up to 465 gross sqm of library floorspace, 190 gross sqm of community floorspace, 345 gross sqm of retail floorspace. Where the need arises to secure economic and social benefits a Compulsory Purchase Order(s) will be made in order to assemble land uses in the public interest."</i>	The Hendon project contributes to Barnet's Sustainable Growth. This is now reflected in GSS01 and supporting text, providing a strategic hook for the Middlesex University and the Burroughs SPD as well as Local Plan site proposals.	Yes
Elizabeth Silver	Policy GSS01	Sustainable growth can only be achieved if: 1 Infrastructure is planned in advance of house-building plans. 2. Resources and plans must be in place in advance e.g. for water supply, sewage and Healthcare. These must not be funded from Community Infrastructure Levies or S106 agreements. 3. We should take account of projected water shortages in the South East https://www.standard.co.uk/news/uk/london-and-southeast-face-major-water-shortages-by-2050-environment-agency-warns-a3846226.html 4. Not all spaces available are built on for housing, so that some room for expansion is available in the future, or possibly there may be decreases in requirements due to lower fertility, or young families moving out of London.	The Reg 19 Local Plan is supported by the Infrastructure Delivery Plan (IDP) which provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No
Geoffrey Silver	Policy GSS01	Para 1 says "infrastructure is key to supporting growth", which is fine if provided in advance, but at Mill Hill East where developments are in full flow, infrastructure needs to catch up, e.g. Mill Hill East trains are often full in the morning rush hour, and Mill Hill GP surgeries are very stretched.	The Infrastructure Delivery Plan (IDP) has been published. The IDP will provide an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No

Land owner 360-366 Burnt Oak Broadway	Policy GSS01	We support the new homes targets identified for Edgware Town Centre (5,000 homes) and Major Thoroughfares (4,900 homes) in particular. These locations (particularly the A5/Edgware Road) offer significant capacity to accommodate new housing development as part of a managed process of change, for which policy support will be key to ensure delivery. We also firmly support the target of accommodating 5,100 homes on sites which have not been formally identified. This will help improve the deliverability of suitable (but currently) unknown windfall sites over the plan period by establishing a supportive policy position, which will be key to delivering sufficient housing to meet the Borough's assessed housing needs. We note the total indicative units in the Schedule of Site Proposals is 16,632, as such it will be critical for sites not already identified as coming forward for residential development to contribute to meeting these targets. This is underpinned by the small sites evidence set out in the London SHLAA.	The Local Plan small sites figure is further supported by changes to Policy CDH01 on Promoting High Quality Design	No
Mill Hill Missionaries	Policy GSS01	The Local Plan should identify alternative sites that can contribute towards meeting not just Barnet's objectively-assessed need, but also the high level of unmet need across the wider London area (circa 140,000 homes).	Barnet has been set a minimum housing target of 35,460 new homes through the London Plan and a OAN of 46,000 new homes	No
Finchley Society	Policy GSS01	Para 4. Rework - there are grave doubts whether Cross Rail 2 will go ahead in the plan period; the West Orbital must also be very uncertain.	These infrastructure projects are programmed transport schemes in London Plan Table 10.1. London Plan Policy T3C states that these schemes should be appropriately safeguarded and so therefore are highlighted in the Local Plan.	No
Ropemaker Properties	Policy GSS01 & GSS09	No land allocated around Hendon station to provide planned 950 homes.	As part of the Call for Sites exercise there was an opportunity for landowners to promote such sites especially as the West London Orbital link had been given the go-ahead. The allocation of new homes due to the WLO is based on greater potential for site intensification due to increased PTALs	No
Environment Agency	Policy GSS02	We recommend you assess where windfall development would be considered acceptable in relation to flood risk in Barnet. A clear position on this helps Development Management teams in their review of planning applications proposed in areas of flood risk, helping to determine whether the Sequential Test requirements are met or not. The Environment Agency can only assist with part (b) of the Exceptions Test, as to whether a site-specific flood risk assessment is acceptable or not. Some fluvial flood risk from River Brent and surface water flood risk including the Hendon Way Critical Drainage Area (CDA) within this Growth Area. We recommend there is acknowledgement of this within the policy with an overall aim to reduce and manage the risk of flooding from all sources.	Agreed. Revision made	Yes
Highways England	Policy GSS02	States under 'Transport Improvements': "Development proposals will need to bring forward the following through detailed design, planning conditions and/ or Section 106 agreements:... Connections and/ or improvements to the strategic road network, that are supported by Transport for London in relation to the TLRN (TfL Road Network), and the Highways Agency in relation to the M1 motorway, based on up to date mode share targets". Highways England must be consulted with respect to any development proposals that have the potential to impact the SRN, in this case the M1. With reference to Policy GSS02, the wording should be updated to refer to Highways England, in place of the Highways Agency.	Agreed. Revision made	Yes
Brent Cross South Partnership (DP9)	Policy GSS02	Reflecting comments above to allow for optimisation of sites and to ensure the consistent use of floorspace references (namely, with regard to the Zonal Floorspace Schedule within the Development Specification and Framework specifies c.110,000m2 of retail and related uses site wide (c.78,000m2 North of the A406 and c.32,000m2 South of the A406)).	Figures reflect the planning consent	No
TfL	Policy GSS02	We welcome the Council's commitment to delivering Healthy Streets in the Brent Cross growth area. Improvements to Brent Cross station are an integral part of facilitating this growth. We would expect to see a reference to delivering capacity enhancement and step-free access to Brent Cross station as part	Agreed	Yes

		of new development in the area. When significant time has passed since transport assessments for development that has not yet commenced, they should be revisited to reflect the latest proposals for Brent Cross station and the current status of transport services in the area. Current assumptions are that public transport use will be higher in future than predicted when the commitment to provide step-free access to Brent Cross station was made by the developer. There is ongoing work to update the models by Argent Related, which the Council could use to test how they submit Good Growth outcome before the local plan is finalised.		
Brent Cross Dev Partners	Policy GSS02	The Draft Local Plan proposes individual Growth Areas in the Local Plan for the Brent Cross Growth Area which includes “Brent Cross North”, “Brent Cross South” and “Brent Cross Thameslink”. These areas are identified on ‘Map 3: Brent Cross regeneration map’ on page 38. As the development north of the A406 is known as Brent Cross London, the DPs request that any reference to “Brent Cross North” is replaced with “Brent Cross London” throughout the document as per the map key. The DPs have several concerns with Map 3. Firstly, the map is not clear and it should be of better quality so it is clearly legible. Secondly, the triangle plots should be identified as being within Brent Cross South as they are to be delivered by LBB and their development partner Argent/Related. The map should be updated as detailed or deleted. Para 4.12.4 identifies that the Brent Cross Growth Area, especially Brent Cross London, will continue to represent an appropriate location to focus retail and related leisure and entertainment activities and it is important that development around Brent Cross Shopping Centre primarily supports the creation of a destination attraction including a range of uses contributing to the night time economy. The DPs welcome this support. Draft Policy GSS02 is concerned with ‘Brent Cross Growth Area’ . The DPs are supportive of the proposed allocation of Brent Cross as a Growth Area and the approach to provide a range of uses within this location. The supporting text at Para 4.13.1 notes that the Brent Cross regeneration will need to deal with changes in economic and market conditions over a long period of time, and that the outline planning permission is now nearly a decade old. Draft Local Plan states that whilst the outline planning permission has limited amount of flexibility to allow the phasing and delivery sequence of the development to be adjusted, it is expected that: <i>“it will need to be supplemented through further planning applications to update areas of the masterplan as it is evolved and as the development responds to updated market and policy shifts.”</i> The Council identify that to enable this, the approach is to create a policy framework for the Brent Cross Growth Area capable of responding to change in the long-term. As such Draft Policy GSS02 includes a section regarding the progress of Brent Cross which notes that the introduction of a new planning framework may be required. Given the current economic uncertainty, particularly within the retail sector, the DPs support the approach to further planning applications being submitted to update areas to the masterplan in order to respond to wider changes. However, the DPs do not consider there is a need for a further planning framework given the detailed criteria in the draft policy that development proposals must address. Draft Policy GSS02 states that development proposals within the Growth Area must comply with a number of requirements including that they must “demonstrate how they achieve comprehensive development of the area.” The DPs are of the opinion that the wording of this requirement as currently drafted is too restrictive and could potentially inhibit sustainable development from coming forward. BXC regeneration is a large and complex scheme that will take over 20 years to deliver and as such, there are potential opportunities for temporary uses to be delivered on areas of the site before they are required for redevelopment. Whilst appropriate temporary uses would enhance and revitalise the area, they may not necessarily be capable of meeting the requirements of the policy wording as currently drafted. We would therefore suggest that the text is revised as follows: “Demonstrate how they assist in achieving comprehensive development of the area, with temporary and meanwhile uses encouraged”. The draft policy states that development proposals within the Growth Area must “protect and improve the amenities of existing and new residents”. The DPs request that the wording of this part of the policy is	The Council welcomes this support. Map 3 has been replaced by new maps showing the boundaries of all Growth Areas / Opportunity Areas. The Council does not consider that the wording will deter sustainable development. A future planning framework remains as a valid option whilst development remains at an early stage.	Yes .

		re-considered. Whilst the protection of residential amenity is supported, in some instances, it would not be possible for development proposals to improve amenity. We would therefore suggest that the wording is revised to include 'where possible' as follows: "Protect and where possible improve the amenities of existing and new residents"		
Finchley Society	Policy GSS02	How can the new Brent Cross town centre be 'green, safe and welcoming to all' with the North Circular running through it, even if there is a mass take-up of almost silent electric cars? Pedestrian bridges over the North Circular should be enclosed to remove the impact of the noise, poor air quality, safety etc. of the road on those crossing it. The Council must bear in mind the needs of the less able and not just the disabled in its design of pedestrian access. While a long and winding slope may suit those in a wheelchair, it does not support those with mobility issues using walking sticks and tri-walker type support, who then have to walk much further.	The design of pedestrian bridges, in particular with regard to accessibility, is best addressed at the planning application stage.	No
Barnet CCG	Policy GSS02	Supports policy stating that development proposals within Brent Cross Growth Area must provide sufficient community infrastructure, including new and expanded schools and primary healthcare capacity. Brent Cross West Growth Area is a new growth opportunity supported by the new Thameslink station. Healthcare capacity provided in Brent Cross South should therefore consider the impact of 1,800 additional homes in Brent Cross West. The CCG welcomes the opportunity to contribute to a Supplementary Planning Document for Brent Cross West.	This support is welcomed	No
Finchley Society	Policy GSS02 & Para 4.13.3	Look forward to seeing and commenting on the indicators and milestones Barnet is developing to monitor progress on the Brent Cross Growth Area. It is essential that developers contribute towards the cost of delivering infrastructure to support new housing, retail, industrial and office space. The policy should cover water and sewage supply and refuse removal from domestic and commercial sites, as well as schools, primary care and various leisure facilities.	Agreed that developers contribute towards the cost of delivering infrastructure to support new housing, These indicators and milestones form part of the Reg 19 document	Yes
Wade Miller-Knight	Policy GSS03	Supportive of night-time use leisure facilities, with suggestion to plan for the night use activities to be along an axis next to the new Brent Cross West station to the current shopping mall. Visual and physical continuity of a covered pedestrian link would be important for movement and encourage use.	A framework for the Brent Cross West area will be prepared which will outline such detail	No
Environment Agency	Policy GSS03	Some fluvial flood risk from the River Brent and surface water flood risk including the Claremont Way Industrial Estate Critical Drainage Area (CDA) within this Growth Area. We recommend there is acknowledgement of this within the policy with an overall aim to reduce and manage the risk of flooding from all sources. Growth and Spatial Strategy GSS03 In addition, there are opportunities to restore and enhance River Brent along the section associated with the Brent Cross West Growth Area, for example, through Kingsbury Park. A similar policy criteria to GSS02 should be added to acknowledge the potential for restoration and enhancement of the River Brent and it's corridor to provide amenity and biodiversity benefits for the area.	Agreed	Yes
LB Brent	Policy GSS03	The Council supports the policy framework that seeks a more 'joined up' approach between the two boroughs and other stakeholders to ensure a more comprehensive development occurs. This will maximise the efficiency of the regeneration of the area, taking account of the opportunities that the improvements to public transport can provide in its attractiveness to inward investment that enhances its place-making characteristics. The Council welcomes the approach that seeks to ensure appropriate social and physical infrastructure is provided to support a new community and that areas/ developments within the respective boroughs make a proportionate contribution to their provision. Whilst some preliminary work has been started in with regards to Staples Corner SIL with the GLA, which LB Barnet are also contributing towards, there could perhaps be a greater clarity on the extent to which LB Barnet will seek to work with LB Brent in adopting a more co-ordinated approach to joint planning for the area. Suggested modification as in other LB Barnet's draft Local Plan Growth Area Policy GSS03: "...The Council will seek to prepare a more detailed planning framework for this area, such as through	Agreed This will be reflected in our Statement of Common Ground	Yes

		an Area Action Plan or a Supplementary Planning Document, potentially ideally through joint working with LB Brent.”		
Mayor of London	Policy GSS03	Useful to show this area on a map as not shown on Map 3 for Brent Cross regeneration	Agreed – Map 3 revised. New maps to show clearer boundaries for Growth Areas with Local Plan proposals sites clearly marked.	Yes
TfL	Policy GSS03 GSS04	We request that the Council add specific reference to supporting development proposals that facilitate access to and delivery of the West London Orbital. We also request that the Council provide clarity on the number of new homes expected to be unlocked in Barnet as part of the scheme. TfL will continue to work with the Council to update this assessment. We welcome that the Council will request contributions towards both new and improved active travel routes to Brent Cross West station, as well as improved interchange, onward travel facilities and public realm outside the station. We ask that the Council include potential contributions toward delivery of the West London Orbital scheme itself in this list. Similarly, we ask that the Council request contributions towards new/improved active travel routes to Cricklewood station, as well as improved interchange, onward travel facilities and public realm outside Cricklewood station.	Agreed. Revisions made in support of West London Orbital, Brent Cross West and Cricklewood Stations. Clarification provided on new homes expected as a result of the WLO.	Yes
Friends of Finchley Way Open Space	Policy GSS03	Strongly support the assertion that residential development should be away from the major road junctions.	This support is welcomed	No
Environment Agency	Policy GSS04	Surface water flood risk is prevalent in this area, along with two or possibly three CDAs (Brent Terrace and Lichfield Road). We recommend there is acknowledgement of this within the policy with an overall aim to reduce and manage the risk of flooding from all sources.	Agreed	Yes
Leila Ager	Policy GSS04	Object to building 1,400 homes due to current poor air quality and traffic problems that already exist.	The Local Plan has identified Cricklewood Town Centre as a Growth Area supporting proposals that optimise densities while improving the overall offer of the town centre.	No
Railway Terraces Residents Association	Policy GSS04 & CDH04	Intensification of development in Cricklewood is not appropriate with development no higher than 10 storeys. B&Q proposals overdeveloping site and should be stepped down as they approach Railways Terraces Conservation Area.	The Local Plan has identified Cricklewood Town Centre as a Growth Area supporting proposals that optimise densities while improving the overall offer of the town centre.	No
Environment Agency	Policy GSS05	We recommend the policy aims to reduce and manage the risk of flooding from all sources, promote sustainable drainage measures and the potential for planning contributions to be sought for the maintenance and upgrade of flood storage areas. We have also identified a number of river restoration and enhancement opportunities for the Edgware Brook, Deans Brook and Silk Stream main rivers. These will improve water quality and biodiversity as well as potentially providing better access and amenity to the rivers. GSS05 should acknowledge the potential for this growth area to contribute to the achievement of river restoration and enhancement for the benefit of flood risk, water quality, biodiversity and amenity for residents.	Agreed	Yes
Land owner at 360-366 Burnt Oak Broadway,	Policy GSS05	We support the designation of Edgware Town Centre as a Growth Area, noting that this is fully aligned with strategic London Plan policies that seek to direct growth to town centres and other areas of good public transport accessibility. The boundary of the growth area should be clearly defined within the Policies Map. We note that the area that immediately surrounds the town centre also offers significant capacity for redevelopment (particularly for housing), therefore we recommend that the boundary of the Growth Area should extend beyond the defined Town Centre Boundary to include edge-of-centre locations (i.e. 300m from the defined boundary as per the NPPF definition). As the location of town centre uses should follow the sequential approach and be directed towards town centre sites, this results in greater potential capacity of edge-of-centre for higher density housing in support of the overall Growth Area objectives. We recognise the importance of retaining employment levels within the	Boundaries for Edgware Growth Area as shown in Reg 19 have been initially established through the Edgware Growth Area SPD. It is important that Growth Areas as a minimum retain existing levels of employment. Policy ECY01 outlines preferred locations for new employment growth. This includes town centres for offices. Policy ECY01 (i) sets out how the Local Plan will consider proposals on non designated employment land. This includes uses such as garages.	Yes

		Edgware Growth Area, however we believe employment should be retained in, and directed appropriately towards, town centres and distinction between the approach to employment retention within town centres and edge-of-centre sites should be made within policy.		
Roger Tichborne	Policy GSS05	Concerned about growth plans and lack of supporting infrastructure provision, including tube capacity, amenities and health services.	Edgware SPD provides greater detail on the plans for growth and infrastructure as well as the IDP.	No
Barnet CCG	Policy GSS05	Noting that potential new housing capacity in Edgware Town Centre has increased to 5,000 homes the CCG would welcome the opportunity to contribute to a detailed planning framework for this area.	We welcome the CCG's input to the Edgware SPD and any subsequent detailed planning frameworks for the area.	No
LB Harrow	Policy GSS05	Further south from Edgware Town Centre is Burnt Oak, which is classified as a District Centre. This centre sits across the three administrative boundaries of LB Harrow, Barnet and Brent. The LB Barnet draft Local Plan seeks to support development in town centres such as Burnt Oak, through policy GSS08 (Barnet's District Town Centres) as such locations are more sustainable. LB Harrow supports the inclusion of such a policy, and the principle of development in sustainable locations. Accordingly, LB Harrow agree that the alternative options would not be in the interests of sustainable development. However, LB Harrow would wish to have further dialogue of development density within Burnt Oak, as there should be a holistic approach across the town centre regardless of administrative boundaries. This should take into account development heights and public realm aspirations for example. Following on from the strategic policies noted above for both Edgware Town Centre and Burnt Oak District Town Centre, LB Harrow supports the accompanying 'generic' town centre policies for these areas; listed as TOW01 (Vibrant Town Centres) and Policy TOW02 (development Principles in Barnet's Town Centres, Local Centres and Parades.	The Council welcomes this support from LB Harrow. We will ensure cross-borough working on proposals affecting Burnt Oak. This will be reflected in our Statement of Common Ground.	No
Aberdeen Standard Investments	Policy GSS05	To assist in realising the growth propose amending the text: " a minimum of 5,000 new homes"	The housing figure shows what the Council is seeking, dependent on specific proposals coming forward. To set the 5,000 figure as a minimum is not appropriate.	No
TfL	Policy GSS05	TfL would welcome continued engagement with the Council on developing a Supplementary Planning Document to help unlock the growth potential of Edgware town centre. We strongly support the Council's ambition to improve transport interchanges and the public realm in Edgware through new development. This policy should set out more clearly what will be expected from development proposals in and around the town centre in terms of contributing towards these improvements, for example provision of additional town centre cycle parking, station cycle parking, and Healthy Streets improvements. We are open to reviewing the 'relationship between the rail and bus stations and the wider town centre' and support greater integration of the town centre with Edgware station and Edgware bus station. However, we would question the emphasis on the stations' role in congestion without reference to reducing incentives to drive. Improving public transport alternatives will also be important for reducing congestion, including through bus priority and protecting land used for transport, including bus garages and railway stabling. We would welcome further discussions with the Council on how the use of the bus and rail station land can be optimised to unlock growth in Edgware and beyond while maintaining the vital functions they carry out. Regeneration of the town centre that involves transport land consolidations should focus first on reducing inefficient uses of land, such as car parking. TfL will strongly support a car-free approach to growth and regeneration in the town centre.	Welcome these comments	No
Middlesex University	Policy GSS06	Additional bullet point under " <i>Colindale development up to 2036 will be focused in the following locations: Middlesex University's Platt Hall and Writtle House site will be redeveloped to provide approximately 1,500 units of student accommodation together with associated facilities and improved integration with the wider area.</i> "	Agreed	Yes
LB Brent	Policy GSS06	With regards to the Growth Area/ Opportunity Area boundary, if its proposed boundary is beyond that identified in the key diagram and more aligned to that shown in the London Plan, it would be helpful for	Agree. New maps have been added to the Reg 19 to clarify the boundaries of the Colindale Opportunity	Yes

		<p>the Barnet Plan to indicate the link with Brent and the potential need to work in a more collaborative manner. LB Brent's draft Local Plan recognises in para 5.3.48 that '<i>As the majority of the Opportunity Area's development will occur in the London Borough of Barnet, the council will have to work closely with it, particularly in relation to development along the A5 Edgware Road to ensure its successful implementation</i>'. A similar recognition in the Barnet Local Plan would clarify the potential for future mutual engagement. It is also unclear of the extent to which the documents identified in para 4.17.9 will continue to inform the development of the area, or whether the policy in the draft Local Plan is a precursor to a wider refresh of existing development plan documents/ supplementary planning advice. If new supporting documents are likely to be produced, LB Brent would be particularly interested in being engaged in their production for those areas along or in close proximity to the borough boundary. If it is the intention for new supplementary documents to be developed, for this to be identified in the policy and working with LB Brent where appropriate.</p>	<p>Area and additional text has been added to ensure close engagement with LB Brent.</p> <p>The Council will ensure that LB Brent are informed of any intention in future to produce new area planning frameworks affecting Colindale. This will be reflected in our Statement of Common Ground.</p>	
Environment Agency	Policy GSS06	<p>We support the policy intention for improvements to open spaces which enhance the amenity and biodiversity at Colindale, Montrose, Rushgrove and Silk Stream Parks. We have identified a number of river restoration measures to the Silk Stream main river to enhance biodiversity such as removal of wooden toe-boarding, removal of concrete bed and banks, removal of weirs and fish easement at weirs in the Silk Stream, Montrose and Rushgrove Parks. Improvements to the Silk Stream river should be explicitly mentioned within this policy measure, to ensure these opportunities are visible alongside the improvements to the open spaces themselves. The wording should be amended (see additions in red text) as follows:</p> <p>Improvements to open spaces and the Silk Stream river which enhances the amenity, biodiversity and makes provision for play space, including at Colindale, Montrose, Rushgrove and Silkstream Parks...The preamble supporting text (4.17.1-4.7.11) should include reference to the river restoration opportunities applicable to these parks, as summarised above. We would also support the following policy criteria in relation to the Public Health England site, with the following amendment to ensure opportunities to enhance biodiversity are also maximised in relation to the aim to reconnect the area with the Silk Stream main river: The Public Health England site where residential led development will re-integrate this site back into Colindale and reconnect the area with the Silk Stream, with enhancements for biodiversity complimenting the riverside location. We are currently working on a new Silk Stream Flood Alleviation Scheme intended to protect areas in Colindale and Rushgrove Park from flood risk. This is likely to require partnership funding contributions to be viable, and it's possible that planning contributions to this scheme may be sought, where appropriate.</p> <p>We strongly recommend the policy acknowledge the flood risks with an overall aim to reduce and manage the risk of flooding from all sources. The potential for planning contributions to be sought towards the Silk Stream Flood Alleviation Scheme and implementation of Sustainable Drainage Systems, should also be included in the policy.</p>	<p>Agreed – Text and policy revised</p> <p>Several river restoration measures have been identified to enhance biodiversity of the Silk Stream main river such as removal of wooden toe-boarding, removal of concrete bed and banks, removal of weirs and fish easement at weirs in the Silk Stream, Montrose and Rushgrove Parks. These projects should occur alongside improvements to the open spaces themselves.</p> <p>The Public Health England site where residential led development will re-integrate this site back into Colindale and reconnect the area with the Silk Stream, with enhancements for biodiversity complimenting the riverside location.</p>	Yes
Home Group	Policy GSS06	<p>Add the following The regeneration of the Douglas Bader Park Estate, including the re-provision of existing affordable houses and flats.</p>	<p>Agreed – Ensure reference is made to Site 10 in GSS06 and supporting text</p>	Yes
LB Brent	Policy GSS06	<p>Colindale town centre falls within LB Brent and LB Barnet. Burnt Oak town centre is identified as a priority town centre elsewhere in the preferred options document. There however is limited mention of Colindale town centre. This is one of Brent's priority town centres. Given Colindale town centre's proximity to the Colindale growth area, the Council feels that the opportunity has been missed to make a specific link between the growth area and the role it will play in supporting the town centre and vice-versa. It would like to see the Barnet Plan be more explicit about this relationship. The draft Barnet Local Plan identifies a list of deliveries for the growth area in addition to new homes delivery. However it could also, like LB Brent's Local Plan <i>Policy BP3 North</i>, include measures in relation to Colindale town centre of enhancing character, identity and its heritage assets. Policy GSS06 and supporting text to be</p>	<p>Agreed. Colindale – The Hyde Town Centre and Burnt Oak have an important part to play in the success of the area. GSS06 and supporting text has been revised to reflect this, including reference to coordinating with LB Brent. This will be reflected in our Statement of Common Ground.</p>	Yes

		more explicit about the relationship between the growth area and the town centre and the potential to address matters that would assist in improving the vitality and viability of that town centre..		
TfL	Policy GSS06	We support the Council's ambition to improve connectivity and reduce severance where possible. We strongly urge the Council to engage with TfL at the earliest opportunity regarding provision of a new walking and cycle route under the Northern line to ensure that any potential impacts on the railway are minimised, mitigated and managed. We would welcome more detailed policy wording that sets out that all development within walking distance of Colindale station will be expected to contribute towards station improvements, potentially including but not limited to delivery of step-free access and capacity enhancement, and provision of additional cycle parking. New development in Colindale should deliver improvements to streets and the public realm in line with the Healthy Streets Approach. We strongly support the Council's aim to deliver 'ongoing improvements to bus services' through new development. We urge the Council to be more explicit in what these improvements could look like and suggest including an expectation that new development will contribute towards bus priority improvements at junctions, provision of bus lanes along bus corridors, service frequency improvements, and/or supporting infrastructure including bus stations, bus garages and/or bus stands. This is to ensure that growth makes a positive contribution both to mitigating its own transport impacts and to enabling wider mode shift to sustainable travel. We strongly welcome implementing on-street parking restrictions through a Controlled Parking Zone (CPZ) and are happy to work with the Council to implement this where appropriate.	The Council has revised GSS06 to clarify that contributions from development will be expected to support infrastructure improvements. More details of such improvements are set out in the IDP.	Yes
LB Harrow	Policy GSS06	Burnt Oak town centre is within the boundary of the Burnt Oak and Colindale Opportunity Area. The Colindale / Burnt Oak Opportunity Area (located in Barnet) is currently under review within the new draft London Plan (2019) (Intend to Publish Version). It sets aside an indicative employment capacity of 2,000 jobs and also the minimum delivery of 7,000 new homes. The Burnt Oak district centre is located across the administrative boundaries of the London Boroughs of Barnet, Brent and Harrow. The district centre of Burnt Oak is split by Burnt Oak Broadway (A5), with a portion located within Harrow. LB Harrow would welcome the opportunity to hold further discussions with LB Barnet in relation to how development would be delivered cross administrative borders, to ensure the success of the wider district centre.	The Council will ensure cross-borough working on proposals affecting Burnt Oak. This will be reflected in our Statement of Common Ground.	No
Redrow Homes	Policy GSS06	Should be made clear that delivery is dependent on compliance with other emerging policies and site specific considerations. Stage 3 of Colindale Gardens/Former Peel Centre should also be included in it's contribution of 1,200 homes to Colindale's growth	The Integrated Impact Assessment has considered policy compliance across the Plan	No
Environment Agency	Policy GSS07	Mill Hill East has areas of risk of flooding from surface water. There is a Critical Drainage Areas identified for this area at Bittacy Park. We recommend the policy acknowledge the flood risk from surface water with an overall aim to reduce and manage this risk with Sustainable Drainage Systems.	Agreed – Text revised	Yes
Mayor of London	Policy GSS07	Should make explicit that green belt must not be developed unless previously developed land.	Agreed – GSS07 revised	Yes
Mill Hill Preservation Society	Policy GSS07	Error in calculation of 745 homes – should be 471	Agreed. Numbers have been corrected.	Yes
Geoffrey Silver	Policy GSS07	says "council will positively consider proposals at Watch Tower House and IBSA House", but the recent IBSA proposal includes blocks that tower over the adjacent Millbrook Park houses, and the Watch Tower House proposal is in strongly protected Green Belt in which any increase in built footprint is destructive of the Green Belt essential characteristics of openness and permanence (NPPF 133).	Any future development proposals for this site will be required to carefully consider its suburban semi-rural character, the Green Belt and Conservation Area status in line with the relevant policies contained within the plan	No
Victor Montefiore	Policy GSS07	It is simply not good enough to tack on to the end of the Policy GSS07 Mill Hill East " <i>Any development proposal must consider the Mill Hill Conservation Area and Green Belt designations.</i> " because it means	Any future development proposals that come forward for this site will be considered in accordance with NPPF paragraph 133 to 147. The NPPF states that	No

		that that all of the figures for 'Indicative residential capacity' cascading through several polices are simply undeliverable	redevelopment on Green Belt is not inappropriate where the proposal would not have a greater impact on the openness of the Green Belt than existing development or would not cause "substantial harm" to the openness of the Green Belt, where the development would re-use previously developed and would contribute to "meeting an identified affordable housing need within the area of the local planning authority" (para 145).	
Wade Miller-Knight	Policy GSS07	Propose the exploration of feasibility of developing a public transport link between Mill Hill Thameslink and Finchley Central and further extension west (Edgware) to east. Is there possibility of West London Orbital continuing to Mill Hill Broadway.	TfL have no plans to fund such work. WLO is an important project for improving orbital travel. Any extension of service would need to be linked to growth around Mill Hill Broadway.	No
Friends of Finchley Way Open Space	Policy GSS07	It is important that all new developments in the Mill Hill East/Mill Hill Village (a Conservation Area) area are cognisant of the proximity of the Green Belt, other open land and the more rural character of and history of the area. The development of the army barracks site has already scarred the sightlines west from West Finchley. This development also impacts on the demand for services in West Finchley and Finchley Central. These impacts do not appear to be catered for. The topography and the very limited public transport to the top of The Ridgeway in Mill Hill Village dictate that residential development is on a scale suitable for the available public transport options. Otherwise development, besides fundamentally changing the nature of the area, will generate car ownership resulting in significant congestion affecting all the surrounding areas. The army barracks and the NIMR sites have been developed and are being developed further. Watchtower House and IBSN House are proposed sites for development. Northern Line trains run to Mill Hill East station outside of the rush hour only as a 15 minute shuttle service from Finchley Central and there is only one bus route to the top of the hill (the 240). Public transport into central London is in danger of failing without significant improvements to the Northern Line, especially with the planned development at Finchley Central and High Barnet stations. Allowing such intensive developments which do not allow residents to own cars and not improving the underground and bus services in the area is negligent in the extreme. This would affect not only the borough of Barnet but also the inner boroughs through which the Northern Line passes.	Growth within the Mill Hill East area will support improvements to public transport. Policy GSS07 has been revised to outline more specific improvements.	Yes
Zizer London	Policy GSS07	In addition to the above, the housing figures referred to in Policy GSS07 'Mill Hill East' and its supporting text should be updated to reflect the proposed capacity of the site.	Numbers have been corrected.	Yes
Marsfield	Policy GSS07	We support the designation of Mill Hill East as a Growth Area, noting that this is fully aligned with strategic London Plan policies. Furthermore, we strongly support the inclusion of the Watchtower House site within the wording of the policy. The boundary of the growth area should be clearly defined within the Policies Map.	Reg 19 shows boundaries of all Growth Areas including Mill Hill East	Yes
Former MHNF	Policy GSS07	Sites 46, 47 & 49 are covered under the section on Mill Hill East (GSS07) and we wonder where the 1400 homes you have allocated in the new growth area will be delivered. We can see maybe 1050 in total leaving a deficit of 350. Please advise.	The additional homes will be from the consented developments highlighted in the housing trajectory.	No
Elizabeth Silver	Policy GSS07	Watchtower House and IBSA house are in Green Belt (see NPPF para 143-147). Development here does not pass tests set out in NPPF Para 136 demonstrating exceptional circumstances. Maximising access could mean improvements in public transport where needed, some wheelchair access, litter collection, landscape maintenance and supervised toilets. Cafes should be limited in number as they encourage unhealthy snacks, car travel and parking.	See response to Roger Tichborne The Watchtower House site was previously identified as a Major Development site within the Green Belt in the 2006 Unitary Development Plan (UDP) due to its existing uses and were considered suitable for redevelopment and/ or infilling. Any future development proposals that come forward for this site	No

			will be considered in accordance with NPPF paras 133 to 147	
TfL	Policy GSS07	An assessment of the impact of further large-scale development around Mill Hill East station needs to be carried out. This station has particularly limited capacity at its gates and staircases. This has been reflected to a degree in Policy GSS09, but including a specific reference in the policy on Mill Hill East would give greater support to the need to assess the impact of cumulative development around the station.	This has been clarified by a revision to GSS07	Yes
Finchley Society	Policy GSS07 & Para 4.18	The transport and traffic consequences of all the Mill Hill developments need admitting and solving. Include a para about this. Unless development is on a scale suitable for the available public transport options it will, besides fundamentally changing the nature of the area, generate car use and significant congestion affecting West Finchley and Finchley Central. Northern Line trains run to Mill Hill East station outside rush hour only as a 15 min shuttle service and there is only one bus route to the top of the hill. Public transport into central London is in danger of failing without significant improvements to the Northern Line; this would affect also other parts of Barnet and the inner boroughs through which the line passes.	Policy and supporting text have been revised to be more specific about transport improvements.	Yes
Redrow Homes	Policy GSS08	Recommend review of all TC and edge of centre sites to ensure parking controls are in place to ensure this isn't a reason for refusal. Applications could include contributions towards CPZs. Part b should also note increase of height to optimise density.	Barnet's car parking study provides a robust justification to parking standards that respond to local circumstances. Increasing density is not always dependent on raising height, as noted in the Tall Buildings evidence base and London Plan (Policy D3 and supporting text).	No
TfL CD	Policy GSS08	Suggest that there is a requirement for development to " <u>Support active travel modes and the Healthy Streets Approach</u> ". Consider extending the town centre boundary for Chipping Barnet) to include High Barnet Station as there are clear transport and interchange links.	GSS08 revised as proposed. Boundary of Chipping Barnet Town Centre established through 2012 Local Plan and confirmed by Draft Local Plan and evidence base.	Yes
Friends of Finchley Way Open Space	Policy GSS08	Point g) Zero provision for car parking ignores lifestage changes. Not all work locations are accessible by tube or easily by bus. Much labour market research demonstrates that where an employee has to take more than one bus to work the job is unsustainable due to the unpredictability of the bus services. Moreover, the major leisure and sport sites being developed are not accessible by public transport from some of the town centre sites currently proposed for development. Job changes and life stage changes may compel some residents to buy a car.	Policy TRC03 has been formulated to be flexible and applied within the context of public transport accessibility	No
Finchley Society	Policy GSS08	Support (g). However, note that major developments such as the TfL site at Finchley Central are going ahead in the absence of well-defined specific local planning frameworks. This is inconsistent with this Policy.	Proposals inevitably will come forward where there is not a planning framework. In such cases we will engage with landowners and developers at an early stage to deliver individual town centre objectives.	No
LB Brent	Policy GSS08	The Council welcomes the identification of Burnt Oak Main Town Centre as a priority location for investment and revitalisation. It will be happy to engage with LB Barnet and LB Harrow in any initiative to consider a more co-ordinated way of addressing the future of the town centre as a whole.	The Council will ensure cross-borough working on proposals affecting Burnt Oak. This will be reflected in our Statement of Common Ground	No
Federation of Residents Associations in Barnet (FORAB)	Policy GSS08	Housing in town centres There is elsewhere in the document a welcome commitment to supporting the economic well-being of town centres, but achieving this is set to conflict with the aim to create 6100 homes within 400 yards of town centres. The thinking around town centres appears somewhat muddled. We are aware of the ambitious concept for North Finchley to rebuild much of the town centre combining replacement shops with increased provision of flats above. But there must be doubts about whether this or similar ambitious schemes will ever materialise given the complexity and capital required just to buy out the existing owners. What we have seen in and around town centres is the conversion of floors above shops to residential, which is ok, and the redevelopment of office and industrial workplaces to residential, resulting in loss of local employment, which is not ok. It should be possible to do more to	The Plan has been revised to reflect the changes to the Use Classes Order and the introduction of Use Class E Commercial Business and Service uses. The A1 use class no longer exists and there is greater flexibility for a former A1 use to convert to another use within the new E use class and contribute to town centre vitality and viability.	Yes

		convert secondary retail space to residential and we are surprised the Plan does not encourage this. Indeed the opposite is the case as the Plan appears to be committed to protecting all retail A1 space. More thought is needed to reconcile this Policy and Policy TOW01.		
Mill Hill Preservation Society	Policy GSS08	Mill Hill designated as District Town Centre in Table 13 but omitted from policy – should policy be renamed?	This policy applies to all 13 District Town Centres	No
West Finchley Residents Association	Policy GSS08	Support for redevelopment of North Finchley and Finchley Central, to include residential units. There is concern for conversion of family homes to smaller units. Further issue raised is the risk of overdevelopment at West Finchley based on its location within 400m from a transport hub. A locally endorsed planning framework is requested at Finchley Central. Seems to contradict slightly by protecting A1 retail and should encourage secondary retail and residential.	We welcome this support. The Plan has a bespoke policy HOU03 which will afford greater protection to family homes at risk of conversion. West Finchley is not specifically identified at GSS08 because of its proximity to North Finchley Town Centre. The A1 use class no longer exists and there is greater flexibility for a former A1 use to convert to another use within the new E use class and contribute to town centre vitality and viability.	No
TfL	Policy GSS08	We support optimising density in town centres. We strongly welcome the supporting text of para 4.19.5 and recommend going further to embed the Healthy Streets Approach in the policy text as well. We welcome the intention of part g of the policy to minimise parking provision, though 'required standard' implies that there is a minimum level of parking required. We suggest requiring 'minimal parking provision' instead. We would also welcome working with the Council on any Supplementary Planning Documents relating to town centre planning objectives to unlock growth.	We welcome the support. Revisions made to supporting text including 'alignment with the Mayor's Healthy Streets Approach' at the end of para 2.	Yes
Barnet Society	Policy GSS08 & Para 4.19.5	Agree but Chipping Barnet is economically weaker than others in and adjacent to the borough because it has to compete with Potters Bar, Hatfield, London Colney and Borehamwood, which are easy to reach by car. Conversely, Hertfordshire commuters to London are drawn to High Barnet and New Barnet Stations because over recent decades bus services in Hertfordshire have atrophied or disappeared altogether, creating extra demand for car use and parking at and around those stations. This should be recognised in the Local Plan.	The Council is seeking to encourage more sustainable forms of transport within the Borough and will use various initiatives such as controlled parking zones to encourage commuters to switch to sustainable modes of transport.	No
Finchley Society	Policy GSS09	Last paragraph, third bullet point. This is much too grudging. Read 'appropriate' for 'allowable.'	Agreed	Yes
Mayor of London	Policy GSS09	The Mayor welcomes growth being directed towards existing and new public transport infrastructure in line with his Good Growth principles. The Mayor supports these schemes and is working with the London boroughs and the Government to secure the funding and deliver these schemes. However, it should be noted that currently both the West London Orbital (WLO) and Crossrail 2 are unfunded. The latest evidence suggests that the WLO could be delivered within the Plan period (2036) and it has been agreed that there could be an uplift of at least 9,000 homes along the route without the loss of Industrial Land. To support the delivery of these schemes Barnet should add specific reference to supporting proposals that facilitate access to and delivery of the West London Orbital at Hendon. Barnet should also seek contributions towards delivery of the West London Orbital through new development. The Mayor would also welcome a more explicit commitment from Barnet to seek contributions from development to fund public transport improvements, including station improvements that are required to support and enable additional demand. In this regard, the impact of regeneration and development on wider Northern line capacity requires assessment. This assessment should not only cover where the line passes through the London Borough of Barnet, but further along the line towards central London too.	Agreed. Local Plan has been revised to seek contributions towards West London Orbital and public transport infrastructure	Yes
Finchley Society	Policy GSS09	The 'may's in line 9 and in the New Southgate paragraph are too tentative. The Council should explain the circumstances in which it would or would not prepare frameworks.	Agreed. This has been changed to 'will'	Yes

Mill Hill Preservation Society	Policy GSS09	Public transport hubs need to provide adequate parking to allow people to access effectively	Increased levels of car parking at transport hubs are not encouraged. Proposals will focus on improving accessibility for pedestrians and cyclists.	No
LB Enfield	Policy GSS09	A greater focus is needed towards developing planning frameworks for the emerging New Southgate Opportunity Area to ensure sufficient assessment of quality and capacity of a range of infrastructure investment, housing, retail and commercial opportunities relating to future growth is properly planned. This enables the implementing authorities to work closely together in delivering strategic objectives that are designed to optimise the emerging growth opportunities.	We look forward to working with the GLA, LB Enfield and LB Haringey in bringing forward an area planning framework. This will be reflected in our Statement of Common Ground.	No
TfL	Policy GSS09	We request the Council adds specific reference to supporting proposals that facilitate access to and delivery of the West London Orbital at Hendon. Like Policy GSS03 we ask that the Council request contributions towards delivery of the West London Orbital through new development. We would also welcome clarity on the number of new homes expected to be unlocked in Barnet as part of the West London Orbital. TfL will continue to work with the Council to update this assessment. We also request a more explicit commitment from the Council to seek contributions from development to fund public transport improvements, including station improvements that are required to support and enable additional demand.either picked up in this policy or elsewhere, the impact of regeneration and development on wider Northern line capacity requires assessment. This assessment should not only cover where the line passes through LB of Barnet, but further along the line towards central London too.Brent Cross Cricklewood represents a particular opportunity to create a more balanced mix of land uses than previous regeneration attempts, which have been limited by overdependence on car-oriented growth assumptions. For Barnet to deliver Good Growth, the local plan should make the case for wider investment in: rail capacity and accessible stations, delivering bus priority on key bus corridors and supporting mixed land use and local employment opportunities. TfL will continue to work with the Council to facilitate delivery of Good Growth across the borough.	The Council has revised GSS09 to clarify that contributions from development will be expected to support WLO and public transport infrastructure.	Yes
Barnet Cycling Campaign	Policy GSS09	Support development and regeneration close to major transport infrastructure if safe cycling and walking routes are provided in the locality.	Support welcomed	No
Friends of Finchley Way Open Space	Policy GSS09	Existing and major new transport infrastructure - Strongly support the assertion that noise and air quality should be taken into account when assessing planning permission.	Support welcomed.	No
TfL (CD)	Policy GSS09	TfL is not generally proposing to retain station car parking provision within its development schemes (except for designated blue badge parking for people with disabilities). Last sentence of para 4.20.11 should therefore be deleted. “The required level of station car parking provision should be assessed and re-provided through a more land-efficient design approach.” Not all developments would have sufficient impact to require enhancements to station / interchange capacity and access; therefore suggest rewording: “If TfL determines that it is necessary, enhances the capacity, access <u>and facilities</u> of the transport interchange;” The provision of multi-storey car parks would not be acceptable from a design point of view and would most likely render schemes unviable; therefore delete: “Where it is proposed to develop a station car park, the Council will assess existing provision and generally support replacement car parking through a more land-efficient design approach such as a multi-storey design.”	The Council will require an assessment of car parking needs as part of any proposals for station car parks. Proposals may be required to retain or re-provide car parking spaces. Revise GSS09 to state <i>enhances the capacity, access <u>and facilities</u> of the transport interchange;”</i>	Yes
Federation of Residents Associations in Barnet (FORAB)	Policy GSS09	Homes and new transport infrastructure - This policy suggests aspiration ignoring reality. We have more to say later on transport infrastructure and the doubts whether the ambitious schemes mentioned will be realised. Moreover, even if these schemes do happen they are more likely than not to be delivered at the very end of the Plan period or later. Any housing should follow, not precede these schemes, and so at best housing proposals directly linked to new transport infrastructure should be expressed in the Plan in very conditional terms.	The Plan has been revised to reflect timescales for WLO and Crossrail 2	Yes

Clive and Gill Hailey	Policy GSS09 & Para 4.20.10	Cross Rail 2 is unlikely to be sanctioned during the period envisaged by this Local Plan, thus the area around Oakleigh Park Rail station must not be considered an opportunity for growth and in any case is totally inappropriate for any new development whatsoever.	Irrespective of Crossrail 2 development around existing stations is inevitable if Barnet is to meet its housing target in sustainable locations and without developing on existing areas designated as Green Belt.	No
Barratt London (QUOD)	Policy GSS10	Bullet point 6 should be revised, to read “Ensure access to sufficient supporting infrastructure where the impacts of development require mitigation. This may include but is not limited to child nurseries, schools, community centres, sport and leisure facilities, and healthcare”.	Agreed	Yes
Environment Agency	Policy GSS10	Important that proposals to intensify existing residential areas mitigate and compensate for the potential increase in surface water runoff and any loss of green space. Sustainable drainage measures and green space networks should be a feature of this policy	Agreed.	Yes
Barratt London (QUOD)	Policy GSS10	Broadly support approach to estate renewal but would welcome the housing target being expressed as a minimum. Bullet point 6 should be revised, to read “Ensure access to sufficient supporting infrastructure where the impacts of development require mitigation. This may include but is not limited to child nurseries, schools, community centres, sport and leisure facilities, and healthcare”.	BSS01 establishes the minimum boroughwide target of 35,460. Table 5 sets out the sources that contribute to delivering that minimum target. Setting the housing unit target as a minimum for each source is unnecessary and reduces flexibility.	No
Home Builders Federation	Policy GSS10	This policy will need to be updated	Policy revised to reflect Mayor’s representations	Yes
Mayor of London	Policy GSS10	The Mayor would welcome working with Barnet on its Estate Renewal and Infill schemes. He is especially pleased with the draft Local Plan’s references to Intend to Publish London Plan Policy H8 (previously Policy H10) and his Good Practice Guide for Estate Regeneration. However, the draft Local Plan policy states that proposals should only take account of policy H8 and sets divergent requirements. To be in line with the Intend to Publish London Plan, Barnet’s approach must require an equivalent amount of affordable housing floorspace, including social rented floorspace, be re-provided from estate renewal schemes and that an up-lift in affordable housing floorspace be sought. The reference to car parking should include that car parking provision should not exceed the standards set out in the Intend to Publish standards set out in Tables 10.3 to 10.5 of the Intend to Publish London Plan.	Agreed	Yes
Brent Cross South Partnership (DP9)	Policy GSS11	Reference to access to active travel is supported; however, it could be broader, for example, enhancement or integration of, as well as reference to other sustainable modes of transport. We support an approach to promoting a range of transport options that provide people with choices to meet different transport needs and encourage healthy and active living.	Agreed. GSS11 revised to widen transport options.	Yes
TfL	Policy GSS11	We strongly support reductions in emissions from vehicles, including through a shift to vehicles that have no exhaust emissions and reduced brake pad emissions, though the policy could do more to set this out within the context of an overall shift away from car use.. We request that the last bullet point is rephrased to avoid supporting development proposals where they provide car parking in accordance with Policy TRC03, as it suggests that at least some car parking must be provided. We suggest referring to ‘any proposals for car parking’ being in accordance instead.	Agreed.	Yes
Finchley Society	Policy GSS11	The sentence ‘This will allow a greater quantum of development to come forward later in the Plan period’ should be strengthened to make it clear that unless the environment around the thoroughfares is improved the greater quantum of development will not be permitted.	Agreed. Text has been revised	Yes
Landsec (Indigo)	Policy GSS11	Amend the policy to reference a minimum of 4,600 additional new homes. Alter the text to remove reference to avoiding a ‘wall-like’ corridor of medium rise buildings.	BSS01 establishes the minimum boroughwide target of 35,460. Table 5 sets out the sources that contribute to that minimum target. Setting the housing unit target as a minimum for each source is unnecessary and reduces flexibility. The effect on visual amenity of continuous medium rise buildings should be avoided. The Council is developing a SPD on Building Heights	No

			to guide proposals and ensure building height is located appropriately.	
Highways England	Policy GSS11	As stated in your document, Highways England will be interested in any proposed development that may have a potential impact on the SRN. It should be ensured that Transport Assessments comprising an assessment of the impact on the SRN are submitted alongside these planning applications. It would be preferred that Highways England should be consulted at pre-application stage for these developments but, should this not happen, Highways England should be consulted as soon as these applications are submitted to LB of Barnet.	In support of the Local Plan a Strategic Transport Assessment has been produced.	Yes
Finchley Society	Policy GSS11	Policy should actively promote the refurbishment of redundant retail units on major thoroughfares as residential accommodation. Shops that stand empty for long periods should be designated for redevelopment along with upper floors.	Policy supports redevelopment, however not all redundant retail units may be suitable for conversion to residential.	No
Barnet Cycling Campaign	Policy GSS11	An additional 4,900 new homes along Barnet's main road corridors will add to traffic congestion unless the alternatives are much better. For cycling that means installing safe cycle tracks along these corridors, especially on strategic routes like the A5, A1000 and A598.	The Plan is very supportive of improving cycling as an active and sustainable form of travel	Yes
Friends of Finchley Way Open Space	Policy GSS11	While generally support this policy, buildings of eight stories or more can still form a wall and have a tunnelling effect on wind, thus reducing the public realm benefits of any redevelopment as they become unpleasant places to sit.	Support noted and welcomed. A SPD on Building Heights will cover design parameters on major thoroughfares.	Yes
TfL CD	Policy GSS11	Suggest that the lists in paras 4.22.1 and 4.22.5 are consolidated into a single list of routes suitable for development. Para 4.22.5 should make clear that Healthy Streets Approach and initiatives should apply to all relevant developments throughout borough. Para 4.22.5 should also make clear that density should increase in areas of good PTAL to optimise the delivery of new homes.	The Council considers it appropriate to seek improvements to these routes in order to unlock capacity. References to the wider application of the Healthy Streets Approach made throughout the Plan. There is a clear message within the Plan about optimisation of density in areas of good PTAL	No
Harrison Varma Ltd (Savills)	Policy GSS11	The proposal to encourage and support additional development capacity along the Major Thoroughfares is welcomed, most particularly in regard to the inclusion of Great North Road as one of the Major Thoroughfares. The detail of the policy, where optimum capacity will be assessed with reference to amenity and design, is also welcomed. However, it is noted that the draft policy also suggests that density will be assessed with reference to the context and character of the surrounding area. If development is to be optimised and potentially intensified, especially in close proximity to transport nodes, it is likely that higher capacity than exists in neighbouring areas could be delivered. Therefore whilst it is appropriate that design does make reference to neighbouring context, this should not limit achieving higher density where this would be appropriate in delivering additional homes and especially in close proximity to transport nodes and major thoroughfares.	The Council welcomes this support. It considers that there is sufficient flexibility within the Local Plan to support high quality development that optimises density. The Council intends to produce small sites design code once the Local Plan is adopted. This is reflected in revisions to CDH01	Yes
Land owner at 360-366 Burnt Oak Broadway,	Policy GSS11	We strongly support this policy. The Edgware Road corridor provides significant potential development capacity for new housing in particular and we support the Council's GSS11 spatial policy which seeks to support the delivery of such development in a planned manner. The Edgware Road/A5 corridor is particularly suitable for taller buildings due to the low sensitivity of the surrounding townscape context (in most parts). While the policy recognises the potential for tall buildings here, we recommend that this should be strengthened to specifically support tall buildings as a means of ensuring that sites are genuinely optimised (with reference to Policy CDH01). We support the allocation of sites (i.e. inclusion in the Schedule of Proposals) within this designated area. In addition, and as per our comment to GSS01, we strongly support the in-principle support for additional (unknown) sites to come forward in the future. We consider this to be particularly important on account of the nature of the existing pattern of (mainly commercial) land uses and the land ownership/lease status of many of these sites which means that sites can become available for development at short notice. We reiterate the point made earlier in relation to sites not already identified being important in supporting housing delivery and meeting the Borough's housing targets.	The Council will be producing a Building Heights SPD. The SPD will enable the Council to provide a clear and well considered response and design guidance to proposals for buildings of different heights including tall buildings and to ensure that the development of various building heights occurs in the most appropriate parts of the Borough.	Yes

LB Brent	Policy GSS11	The Council recognises the identification of A5 Watling Road as a major thoroughfare. It supports the policy in relation to development achieving 'a high-quality design that enhances visual amenity and does not contribute to a continuous 'wall like' corridor of medium rise buildings between town centres' and also where it 'Contributes to an improved and more active streetscape and facilitates delivery of healthy streets approach' in particular. It recognises the identification of the A5 as 'suitable for tall buildings in some sections'. This is consistent with LB Brent's identification of the corridor in parts for tall buildings. The Council would like to work with LB Barnet to ensure that the identified locations are complementary and that Brent has some input into the A5 tall buildings study that LB Barnet has indicated that it is looking to progress.	We welcome the contributions made by LB Brent to the A5 Heights Strategy which has been fed into the Tall Buildings Update This will be reflected in our Statement of Common Ground.	Yes
LB Harrow	Policy GSS11	LB Harrow is in discussions with both LB Barnet and LB Brent in relation to development and regeneration along the A5, and it is encouraged that this dialogue continues for a comprehensive approach to development along the A5. The Draft LB Barnet plan provides policy through GSS11 (Major Thoroughfares), which identifies such thoroughfares as having good growth potential. LB Harrow supports the overarching principle of Policy GSS11, specifically where it relates to an improvement to the A5, which forms the administrative boundary between the two boroughs. Development / regeneration of this corridor is considered to be an appropriate position, specifically where development is brought forward with the Healthy Streets Approach. Accordingly, LB Harrow concur that the alternatives put forward in terms of a policy approach would not be appropriate. The draft Plan refers to development heights of tall buildings (8 storeys or more) along major thoroughfares, also needing to comply with policy CDH04. Whilst it is encouraged that a specific assessment be undertaken for such developments, LB Harrow do not have any formal guidance as to what would constitute a tall building on its side of the A5. In the absence of such evidence, LB Harrow would seek further dialogue in relation to tall buildings, to ensure that a holistic approach to the development of (specifically) the A5 would not appear as a borough boundary with a disjointed approach to developments. Harrow has recently commissioned a Characterisation and Tall Building Study for the borough. The preparation of this study represents an opportunity to understand Barnet's approach to tall buildings and constructively engage with Barnet in the development of Harrow's evidence base in relation to tall buildings (including design principles). LB Harrow does not object to any of the policies that have a direct impact on the development that would occur on or adjacent to the administrative boundary with LB Barnet. LB Harrow agrees with the Policy approaches put forward, and accordingly agree that the alternatives put forward not be appropriate. Notwithstanding this, development along the common administrative boundary has the potential to impact on LB Harrow and its residents. A holistic approach to development within these locations is considered appropriate to ensure that administrative boundaries are seamless in character, and impacts on LB Harrow residents can be appropriately mitigated.	We welcome the contributions made by LB Harrow to the A5 Heights Strategy which has been fed into the Tall Buildings Update This will be reflected in our Statement of Common Ground.	Yes
Barnet Cycling Campaign	Policy GSS12	The proviso that car parking spaces will [only] be released if surplus to requirements or re-provided will not drive the sort of change needed to support other policies on active travel and climate change.	Council is committed to delivery of sustainable and active travel.. It is proactive in promoting travel behaviour modal shift and reducing car parking. However, use of the car will remain important and an adequate level of parking provision needed.	No
Federation of Residents Associations in Barnet (FORAB)	Policy GSS12	We note the intention to maintain car parking as part of any redevelopment, but it will be inescapable that a car park would have to be closed for a considerable period of time whilst redevelopment takes place. Such is the fragile state of our town centre economies that we view this idea with some foreboding. Pedestrianisation schemes and other changes to the public realm to make the experience better for visitors to town centres, which are being encouraged, do often lead to some loss of parking. We do not wish to see any more parking spaces lost than necessary. Whilst some car parks may lend themselves to redevelopment without disruption, we consider this policy needs to be approached with extreme caution, and the need to do this should be reflected in the text.	National and London Plan policy supports the more efficient use of land including car parks. Text revised to ensure flexible application of GSS12 will be necessary in terms of alternative provision during re-development. The policy requires a demonstration that capacity is surplus to requirements.	Yes

Friern Barnet and Whetstone Residents' Association	Policy GSS12	Policy GSS12 supports the development of surface level “public car parks” subject to provisos. The proviso that parking spaces can be demonstrated as being surplus to requirements or re-provided as needed” should be strengthened so that proposals which do not satisfy this will be refused, not merely “not supported”. It should be clarified in GSS12 itself that this policy only applies to Council owned car parks. However similar tests should apply for the protection of other (private) car parks, such as those located at identified potential development sites (including TfL Underground stations) as these too form much needed parking facilities.	National planning policy supports the more efficient use of land including car parks. GSS12 applies to all publically accessible car parks. Text revised to ensure flexible application of GSS12 will be necessary in terms of alternative provision during re-development. The policy requires a demonstration that capacity is surplus to requirements.	Yes
TfL	Policy GSS12	The redevelopment of car parks, particularly in well-connected locations, is a key opportunity to make a more efficient use of land to address London’s housing crisis and reduce congestion at the same time. The policy refers to the loss of spaces that are surplus to ‘requirement’ or re-providing based on ‘need’. However, it makes no reference to how ‘need’ will be assessed. The availability of parking creates incentives to use it and therefore demand for spaces do not necessarily indicate ‘need’ as those driving there could have good alternatives. Any ‘need’ identified would also have to be weighed up against the impact of accommodating it, particularly congestion, road danger and emissions, sometimes in locations where these problems are already more acute. Planning for a sustainable London must be based on demand management rather than predict and provide. We urge the Council to give clearer support to reducing levels of parking where car parks are redeveloped. Car parking is a space-hungry and inefficient use of land, especially in built-up, well-connected areas. Provision or retention of car parking leads to car dominance in the public realm, which creates a less attractive environment for walking and cycling. It also does not align with the Council’s ambition as set out in Policy GSS11 to reduce vehicle emissions – cars create air pollution both from exhaust emissions and from brake pad wear. A policy requirement to retain car parking as part of redevelopment also limits the optimisation of development density.	The Council has been proactive in introducing this policy. For this policy to succeed there has to be a specific Barnet approach which demonstrates that the Local Plan is responding to local circumstances. GSS12 and supporting text has been broadened to clarify how spaces will be quantified as surplus and any re-provision justified.	No
TfL CD	Policy GSS12	TfL will not generally provide replacement station car parking (except for people with disabilities). Therefore the second bullet should be deleted as it would not be in accordance with the MTS and draft NLP and would not be sound once the latter is formally adopted.	See response above to TfL Spatial Planning	No
Mayor of London	Policy GSS12	The Mayor welcomes the redevelopment of Barnet’s car parks. Any re-provision of car parking spaces should be minimised and should not exceed the Intend to Publish car parking standards.	See response above to TfL	No
CPRE	Policy GSS12	Car parking at stations should <u>not</u> be retained even with more efficient land use, and space should instead be used to plan for much greater use of bus connections or cycles	The Local Plan approach to car park development as reflected in GSS12 is more realistic, recognising that proposals need to demonstrate no knock on effects of removing parking capacity.	No
Friends of Finchley Way Open Space	Policy GSS12	Car Parks - Vital that car ownership is not under-estimated as this will lead to pavement parking and general congestion.	The policy requires a demonstration that capacity is surplus to requirements.	No
Barnet Society	Policy GSS12	Policy and related paragraph should recognise the extra demand for car parking at stations close to Hertfordshire. Wholesale removal of parking at High Barnet and New Barnet Stations would be counter-productive, displacing cars onto local streets and discouraging car-sharing and other integrated transport solutions.	The Council is seeking to encourage more sustainable forms of transport within the Borough and will use various initiatives such as controlled parking zones to encourage commuters to switch to sustainable modes of transport.	No
Barratt London	Policy GSS12	Policy GSS01 refers to “Other large sites including car parks”, albeit Policy GSS12 is drafted to only refer to car parks. Consider that the flexibility of the Plan should retain recognition that there will be major windfall sites over the life of the plan, including car park sites.	Whilst it is likely that there will be major windfall sites other than car parks, the Council wants a specific policy relating to development potential of existing surface car parks.	No
Environment Agency	Policy GSS13	Although we support the policies intention to activate open spaces alongside improvements to nature conservation and biodiversity enhancements, we think Barnet’s rivers should feature prominently within this policy. Given the specific endorsement within the All London Green Grid, we recommend the policy	Agreed	Yes

		is amended to include river restoration as one of the improvements that can be delivered, with some supporting text in section 4.24 to expand further (see suggested wording below in red text). The Council will seek to activate open spaces across Barnet through new and improved outdoor sports, leisure and recreational facilities. Such improvements will be delivered alongside nature conservation and biodiversity enhancements such as river restoration.		
Elizabeth Silver	Policy GSS13	Add: Improvements should not mean commercial or built-on development, or pay-for recreational facilities. They should include maintenance of the green space as a natural environment e.g. as woodland.	The Council aims to provide a range of parks, open spaces and leisure facilities across the borough to suit the needs of all users. ECC04 seeks to optimise the benefits of open space and create more accessible green spaces through a range of measures.	No
Barnet Cycling Campaign	Policy GSS13	Support the establishment of a Regional Park within the Brent Valley / Barnet Plateau area but ask for fuller details of what is proposed. In particular for good cycling facilities in it similar to the Lee Valley Regional Park.	The establishment of a Regional Park is at a very early stage. However it remains an ambition of the Council within the lifetime of the Local Plan.	Yes
Ramblers Association	Policy GSS13 & CHW02	Supportive	Welcome the support	No
Environment Agency	Policy GSS8	Green spaces within an urban setting planned to foster an interconnected network of green infrastructure should be promoted in the policy. GSS08 does not acknowledge opportunities for improving the natural environment and we would like to see this included so it is clear what applicants are expected to achieve.	Agreed.	Yes
Home Builders Federation	Figure 3	The housing trajectory should use the OAN housing requirement figure of 3,060 dpa, rather than the Draft London Plan figure of 2,364 dpa. Table 5 indicates that 16,950 homes in total can be delivered in the first five years of the plan (2021/22 – 2025/26). This would equate to an annual average of 3,390 homes. This does not appear to be reflected in the Trajectory as only two bars on the chart showing projected completions exceed the 3,000 mark. This suggests that the Housing Trajectory is based on the Draft London Plan targets (as para. 4.7.5 states) while Table 5 is merely demonstrating the Council's own local aims. This will need to be clarified to avoid confusion. This may be because the Housing Delivery Test requires that local authority performance in terms of housing delivery is monitored against the most up-to-date London Plan targets. The Council should clarify this, but a trajectory is needed to show how the Council intends to deliver the Local Plan housing requirement even if its performance by Government will be measured against the London Plan target.	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.	Yes
St William Homes LLP	Figure 3	The London Plan Inspector's Panel Report found that the 2017 SHMA though provided a reliable starting point for the housing needs of London, they concluded the reliance on small sites was not fully justifiable or achievable. The Mayor accepted this and lowered the overall housing target (although highlighting that the target remains a minimum). The Panel Report made it very clear that an early review of the London Plan is expected; the Secretary of State's letter to the Mayor of July 2018 indicated an expectation that the Plan should be reviewed <i>immediately</i> once it has been published so that new national policies in the 2019 NPPF, including the standardised methodology are accorded to at the earliest opportunity. In addition to this, the SoS Direction on the London Plan issued 13th March 2020, makes it clear that London needs a step change in delivery of housing. The Council's Housing Trajectory shows that the Council have not delivered 2,349 new homes in the past 15 years. The highest rate of completions achieved was 2,016 in 2012/13. As part of the Local Plan process, the	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning	No

		unmet housing need should be considered. The Council should not stifle needed homes growth, in doing so the Council needs to accept that a step change in delivery is needed.	authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.	
John Cox	Table 5	First of all, for the general non-expert reader there is confusion in other London borough Local Plans about the use of the words “Small sites” and “Minor sites/[developments]”. It is not clear that you are innocent of that confusion, so please review the clarity in your use of the terms. Neither is in your glossary. It is also not immediately clear what efforts you are making to introduce financial contributions towards off-site affordable housing, from sites up to 9 units. A viability study might test 5, 7 or 9 units, but it would be just as easy to test 2 or 3 units. What are the borough’s proposed contribution amounts per unit? (LB Islington usually gets about £50k/unit.) In September 2019 the Planning Inspectorate accepted Tower Hamlet’s Draft Local Plan specifying 2 to 9 units after viability testing. That borough expects to get about £65-million over 10 years as a result. That also means that eight London boroughs are now getting some contributions from minor sites.	Small Sites are defined in the Glossary. The approach on affordable housing is clearly set out in HOU01.	Yes
Mill Hill Missionaries	Table 5	Identifying and allocating the necessary quantum of land that is appropriate for residential development is crucial, and it is therefore suggested that the Council align with the ‘Intend to Publish’ small sites target and find any additional sites needed to address the small site shortfall.	Table 5 shows that the minimum housing target of 35,460 is deliverable. This reduces reliance on the contribution of small sites	No
Home Builders Federation	Table 5	HBF welcomes the Council’s aim to ‘frontload’ housing delivery and not rely on more homes being delivered towards the end of the plan. The fact that the Council might be able to deliver 33,750 homes in the first ten years of the life of the Plan – a figure that would exceed the OAN requirement for 30,600 homes – indicates that it would be reasonable to plan for ten years rather than 15. However, the base date of the Local Plan should be the same base date as the Draft London Plan – 2019/20. Table 5 indicates that some 3,400 homes could be provided on small sites, or 5,100 over 15 years. LONDON PLAN Policy H2 aims to increase the supply of small sites to support smaller developers, especially in the outer London boroughs. LONDON PLAN Table 4.2 establishes 10-year minimum targets (2019/20 - 2028/29) for net housing completions on small sites (below 0.25 hectares in size) for each London planning authority. For Barnet, the ten-year target is a minimum of 4,430 homes. This is about 1,000 homes higher than the number that The Council anticipates providing on small sites. HBF strongly recommends that the Council aligns with the Draft London Plan Intend to Publish small sites target. Increasing the number of small sites by identifying these and allocating them in the Local Plan will be key to improving the pace of housing delivery across Greater London and the nation. Allocating a more diverse range of sites, both in terms of size and location, will help diversify production, diversify build types, and increase competition among housing providers. This will help improve build-out rates and, hopefully in the long run, improve affordability. This is something that the Government has come to realise through the Letwin Review. National policy now requires all local planning authorities to identify land of one hectare or less to accommodate at least 10% of the overall housing requirement (NPPF, para. 68). For Barnet, that would require land for at least 3,060 homes to be provided on small sites of one hectare or less over the ten-year life of the Local Plan. Table 5 suggests that the national policy requirement is achievable but that the LONDON PLAN Intend to Publish small sites target may not be achieved. Second, it is unclear how this small site figure has been derived. Is this a small site assumption based on past windfall trends (as the LONDON PLAN target is derived), or is it underpinned by actual land allocations? If it is a windfall trend, then HBF would strongly caution the Council against an assumption that this will satisfy the new requirements of national policy. Identifying and allocating land that is appropriate for residential development in the Local Plan is critical to supporting the growth of SME developers, since one of the chief financial obstacles small builders face is trying to establish the principle of residential development on sites not allocated in local plans. We have noted the background paper called Site Selection Background Report, December 2019.	This Plan needs to be in general conformity with the London Plan and the Mayor has not raised an issue about the timeframe of Barnet’s Local Plan. Table 5 shows that the minimum housing target of 35,460 is deliverable. This reduces reliance on the contribution of small sites	Yes

		It is interesting that this paper does not refer to para. 68 of the NPPF and its requirement that 10% of the housing requirement is delivered on sites of one hectare or less, or 0.25 ha in the case of London. Para. 3.3.6 refers to the Council operating a site threshold of 0.1 ha to identify small sites. It is unclear from appendix 2 – the list of sites considered deliverable and developable – which of these are the sites that fall within the 0.1ha and 0.25ha window. These are precisely the sort of site sizes that should be allocated in increasing numbers to enable London’s housing targets to be achieved. Without an allocation it is much harder to secure a planning permission. Without a planning permission it is nearly impossible for SMEs to secure finance from banks and other lenders. Banks will rarely lend until a developer has a full, implementable, planning permission. As SMEs cannot afford to spend money promoting sites through the planning system this is one of the chief reasons why the number of SMEs has collapsed by 80% since the inception of the plan-led system in 1990.		
St William Homes LLP	Table 5 & Policy GSS08	The general approach to delivering sustainable growth by focussing development within growth areas, district town centres and around transport hubs is supported and presumption of brownfield first is fully supported. Table 5 indicates only 13% of growth to occur within district town centres. If Council wishes to minimise Greenbelt release, development in the district centres needs further exploration – growth scenarios in line with GSS01 and GSS08 will need updating to reflect this and specifically, draft policy GSS08 should include text relating to the role district centres can play in delivering needed growth in a sustainable manner. In addition, GSS08 should make it clearer that residential - led development will be supported. Many of the Town Centre Frameworks which the Council expect to provide the basis for managing and promoting positive change in town centres are out of date and therefore should not be relied on to promote the change and growth envisaged by the Local Plan itself.	Support welcomed.. Our aim is to bring forward frameworks that can shape future growth. This is reflected in the work at Edgware and North Finchley. Proposals inevitably will come forward where there is not a planning framework. In such cases we will engage with landowners and developers at an early stage to deliver individual town centre objectives.	No
Federation of Residents Associations in Barnet (FORAB)	Chapter 5	Demolish and Redevelop - The Plan seeks to be explicit on conversions and extensions to provide appropriate protection, but is silent on proposals to demolish a detached family home or a pair of semis and replace with a small block of flats. Many such applications have been made in recent years and, as with conversions, planning decisions have not been consistent. We anticipate that without explicit controls such applications will increase. We suggest a policy similar to that for conversions is needed. With the presumption that such proposals will normally need to conform to the same clauses (a) to (g) along with the limitation on roads characterised by houses.	Agreed that an approach that is consistent with HOU03 is required in terms of redevelopment. Continuing to resist the loss of existing larger homes should help ensure that the dwelling stock remains balanced in Barnet and capable of providing housing choice.	Yes
Friends of Finchley Way Open Space	Chapter 5	Support the reduced number of homes to be built in the period of the Plan. Targets must take account of need but also of demand, capacity to build and land availability as well as the wellbeing of existing residents. As population density increases, smaller and more local green spaces will be needed for play, relaxation, fresh air, etc. Existing parks, recreation grounds and small green spaces need funding in order to be maintained in proper order. Current Green spaces Team is too over-stretched to support the number of sites in the borough. It is important that new dwellings are capable of adapting to needs as people age and/or that a suitable range of accommodation is available for sale and to rent. There is a tendency to assume that people move straight from being able bodied to being in a wheelchair and needing care. In fact intermediary levels of fitness (such as having difficulty with steps and using a walking stick) that do not require formal care but need domestic adjustments and easier access to public transport, last much longer during the 70s and 80s. It is also often assumed that downsizing means moving to a one bedroom flat. People in their 70s and 80s today want active social space for entertaining and spending more time at home in retirement, they may want studies and utility rooms. They may also need bedrooms for grandchildren to stay. Encouraging older people to vacate traditional family houses will require changes to stamp duty as this often makes moving uneconomic, given the relative price of flats compared to houses in the borough.	The minimum housing target of 35,460 is based on the London Plan. Housing targets are set through the London Plan and based on assessments of capacity and need. It is important that homes are adaptable to changes in peoples life cycles and that an appropriate choice of housing and level of support is provided to enable people to live independently to for as long as possible.	No
Barnet Society	Chapter 5	Support the views submitted by FORAB.	Support for FORAB’s views noted.	No

Brent Cross South Partnership (DP9)	Chapter 5	We support reference within housing policies and supporting text to the importance of providing a broad range of tenures, including build to rent, to ensure the delivery of a range of housing types.	The Council welcomes this support	No
Verena Donig	Chapter 5	Lack of support for homeless people in the Borough.	The Local Plan forms part of the Council's efforts to deliver housing in the Borough to meet the needs of the population, including the homeless.	No
Brent Cross South Partnership (DP9)	Chapter 5	Flexibility should be applied to ensure that a mix of housing types is delivered and the housing typologies and unit mixes within them (where relevant) should be assessed on a case by case basis taking account of site and area specific circumstances.	There is flexibility within the Housing Mix policy	No
Isaac Isaac Saul	Section 5.9	I object to student accommodation plans. We need more resident parking as there are few spaces for residents and students park blocking our spaces	Chapter 11 clarifies CPZ process	No
Finchley Society	Para 5.11.4	Second sentence should explain the legal basis of these requirements. If they are within Barnet's control 90 should be reduced to 60 and should not be continuous.	Agreed. New text added on legal basis for the 90 days	Yes
Modomo (Modular Housing) (Collective Planning)	Para 5.11.5	Corresponding to above 'The Schedule of Proposals in Annex 1 sets out specific sites where meanwhile uses are appropriate. The Council will work with developers and landowners to identify appropriate sites for meanwhile uses.'	Agreed. Wording revised	Yes
Clive and Gill Hailey	Para 5.13.1	Back Land developments / garden grabbing is an abomination and must be prevented. Local issues resulting in court cases have graphically illustrated how the Title of lands proposed for access to potential back land / garden grabs must be fully researched, validated and legalised as part of the planning process - developers must prove they have permission to access the land with vehicles, machinery and utility supplies.	The Plan seeks to protect back gardens as an important part of Barnet's suburban character and contribution to sustainability	No
Former MHNF	Para 5.13.2	We agree that Self Build and/or modular building construction should be encouraged. It delivers a quality product at greatly reduced cost. If such an initiative could be included in projects using Public Sector land, there would be significant benefits to those residents who have grown up in the area and wish now to have a home of their own. Will the Local Plan actively seek sites for self-build? And if so, there needs to be an appropriate code of construction in place alongside, plus cross references to local character and design (without wishing to stifle innovation).	The Local Plan's approach to self-build is in accordance with the 2015 Self Build and Custom Housebuilding Act. Neighbourhood Plans can play a more active role in identifying sites for self-build.	No
Finchley Society	Para 5.2.4	Add a further bullet point: 'multigenerational developments to enable older persons and young persons to live together'	Agreed	Yes
Finchley Society	Para 5.2.4	There should be an indication here of how many 'homes to meet the needs of older people and those with disabilities including young people needing support' have been provided in recent years.	Figures on need for Older Persons Housing up to 2036 is set out in Table 8. The Plan at Policy HOU04 sets out how it will address housing choice for people with social care and health support needs.	No
Brent Cross South Partnership (DP9)	Para 5.2.4	We strongly support the recognition that a mix of housing types is required.	The Council welcomes this support.	No
Finchley Society	Para 5.2.4	Last but one bullet point. Good	The Council welcomes this support.	No
Middlesex University (Tibbalds Planning)	Para 5.2.4	The recognition within the Local Plan (Paragraph 5.2.4) that purpose built student accommodation to support higher education institutions is an important part of the mix of housing types that are needed to meet the Borough's needs is therefore welcomed.	The Council welcomes this support.	No
Finchley Society	Para 5.3.1	Line 4. 'generated by demographic growth' is simplistic. The paragraph should recognise that there are other factors: houses as investment and demand is not unaffected by supply (e.g. young people move if it's easy but stay at home if it isn't).	Agreed that the context is more complex. Revised text to reflect this.	Yes

Finchley Society	Para 5.4.11	Add at end 'Every effort must be made to replace the numbers of social housing units lost through estate regeneration so that as many, or more, social housing units are achieved.'	Policy HOU01 has been revised to clarify the approach to Estate Regeneration	Yes
Finchley Society	Para 5.4.4	This has the perverse effect of restricting many flat developments to 10 when the site could take two or three more. The sentence in the Alternative Options box 'The proposed policy will assess the capacity of sites under the threshold to ensure development is at an optimum capacity' gives some reassurance and should be imported into the main text.	Ensuring efficient use of capacity has been a longstanding approach to securing affordable housing. The text has been revised	Yes
Home Builders Federation	Para 5.4.6	We note in paragraph 5.4.6 that the sub-regional SHMA has assessed a high need for affordable housing – some 23% of the total need, or 10,600 homes by 2036. We note that the Council intends to adhere to the Draft London Plan threshold policy approach to help deliver more affordable housing. This is sensible. HBF hopes that the Council will monitor the effectiveness of this policy mechanism. This could help to improve the supply of affordable housing across Greater London.	The Council welcomes this support.	No
Finchley Society	Para 5.4.7	The Viability Assessment should be consulted on separately before it appears at the Reg 19 stage.	The Viability Assessment has been published as part of the Reg 19 evidence base	No
Finchley Society	Para 5.5.2	Strongly supported.	The Council welcomes this support.	No
Finchley Society	Para 5.5.5	Produce the evidence. A family may well have more than one child, and of different sexes.	Table 9 shows that a 2 bedroom property of 70m2 to 79m2 GIA could accommodate 4 persons. This could be a couple with young children sharing a bedroom.	No
Finchley Society	Para 5.6.4	Space standards expressed in m2 only do not guarantee good and usable space standards. As well as provisions about floor areas the Lifetime Homes guidelines should be reinstated. Conversions quite often result in tortuous layouts owing to the constraints of the physical existing building. 74m2 is too small for 3 bedrooms, and should increase.	The space standards are an essential tool to support good quality accommodation that is delivered through the planning system.	No
Home Builders Federation	Para 5.7.2	Table 4.3 of the Draft London Plan establishes annual borough benchmarks for specialist older persons housing for the period 2017-2029. HBF would like to see the benchmark target for Barnet reflected in a separate and specific policy in the Barnet Local Plan- i.e. that the council will aim to deliver 275 units of specialist older persons housing each year. Although London is a relatively young city, the GLA expects those aged 65 and over will increase by 37% over the next decade. The Council identifies a growing need for specialist accommodation for older people of all types in Barnet (para. 5.7.2). National planning policy places a strong emphasis on improving the supply of older persons housing (NPPF, para. 61). The supply of such homes will also contribute to diversifying housing types and this will help to improve build-out rates. Reflecting the Draft London Plan benchmark target does not mean that this target will become a 'binding' target that has to be delivered by the local authority. Instead it will provide the Council with something to aim for, and to monitor its performance against. However, to avoid the benchmark target being ignored, we recommend that the new policy states that a 'presumption in favour' of older persons housing schemes will come into effect if the benchmark target has not been achieved in the previous year. The Council should record the delivery of specialist older persons housing as part of its Annual Monitoring Report.	This benchmark is clearly reflected in HOU04 and a specific policy is not merited. Indicators for monitoring the Local Plan have been published. This includes specialist older persons housing.	No
Finchley Society	Para 5.7.5	This paragraph should indicate where the homes for these young people are to be built and by whom.	The preferred locations for housing young people are sites that are within 400m of local shops and are easily accessible by public transport. As a strategic document covering 15 years the Local Plan is unable to be specific on who will build such homes.	No
Finchley Society	Para 5.8.2	The applications for an HMO Licence and planning permission for Change of Use should not be considered separately. Approval for Change of Use from C3 to C4 should be granted before an HMO Licence is considered (with greater transparency and liaison between the Council departments responsible). It should be mandatory for all HMO owners to acquire a formal accreditation through the	Process on HMO licensing is clarified	yes

		London Landlord Accreditation Scheme - mere encouragement is unrealistic and ineffectual. High standards of space and accommodation should be required. Most of these establishments are rented out to young people who may not be aware of their rights or who to complain to. Furthermore, they may not even be aware that some of practices (e.g. untidy front areas – having friends staying overnight etc. etc. – thus, increasing the comings and goings of the premises) impact on neighbours. HMOs should have Managers living on site in order to maintain standards.		
Brent Cross South Partnership (DP9)	Para 5.8.2	Ensure that Build to Rent (BtR) falls outside of the requirement of an HMO license.	We expect BtR products to be in Use Class C3.	No
Middlesex University (Tibbalds Planning)	Para 5.9.1	The University is pleased that the Local Plan recognises that higher and further education institutions make a significant contribution to the economy and labour market, and that new purpose-built accommodation will meet identified needs in the Borough and help take pressure off the conventional housing stock (Para 5.9.1).	The Council welcomes this support.	No
Finchley Society	Para 5.9.3	Student accommodation should be located where the need to commute is at the absolute minimum.	That is certainly reflected in the proposals for student accommodation around the Hendon Campus of Middlesex University.	No
Finchley Society	Paras 5.4.8 & 5.4.9	These paragraphs show the clear contrast between the London Plan target of 50% affordable housing and the Barnet minimum figure of 35%. If the Barnet Plan is to be deemed 'sound' at the Examination-in-Public it will have to demonstrate that the 35% minimum is compatible with a 50% target or that it would be unreasonable for that target to apply to Barnet. If material in the SHMA does help this it will have to be spelt out in the Plan.	The Mayor of London has not objected to this approach	No
Barnet CCG	Policy HOU01	Suggest that fifth paragraph of the policy is amended to read: "Innovative housing products that meet the requirements of this Policy will be supported, including approaches that set aside a proportion of homes on land owned by Government departments and agencies for key workers, such as health and education professionals."	Agreed – However policy on keyworker housing is largely a matter for the Housing Strategy	Yes
TfL CD	Policy HOU01	The second paragraph of the policy and paragraph 5.4.1 are unclear. Rewording is suggested, based sequentially on habitable rooms, then habitable floorspace. Para 5.4.8 makes an incorrect assertion: the 50% threshold level for public sector land applies to public sector land where there is no portfolio agreement with the Mayor. Suggest re-wording.	Agreed	Yes
John Cox	Policy HOU01	I would make a plea that your presentation of evidence and your consequent reasoning should be reviewed (independently but internally) so that you are satisfied that it is crystal clear to the general non-expert reader. The public successfully lobbied at the new London Plan EiP that definitions of affordable housing categories needed to be separated. There is a difference in costs between social and London Affordable Rent homes and a regressive impact that the latter may have on low-income households in Barnet. It is arguable (although unachievable) that affordable targets should just be for social-rented homes. Nevertheless, every part of your affordable housing material should be reviewed, so that the separation of definitions is documented properly on every occasion without exception. Barnet should consider setting separate targets for social and London Affordable Rent - to ensure that these homes are not all delivered at London Affordable Rent, and to show a commitment to delivery of social-rented homes to meet the needs of low-income households.	HOU01 reflects Barnet's Housing Strategy and has been revised to align with the London Plan.	No
Barratt London	Policy HOU01	The policy requires that the "the basis of calculations for the affordable housing requirement will relate to a combination of units, either the number of habitable rooms or the floorspace of the residential development". This is ambiguous and should be revised to relate to habitable rooms, in conformity with the Intend to Publish London Plan (2019).	HOU01 revised to be consistent with London Plan.	Yes
Brent Cross South Partnership	Policy HOU01	Further clarity is needed on the methodology for calculating affordable housing, and it would be helpful if one basis for calculations (e.g. habitable rooms) was specified.	Methodology has been further clarified	Yes

Barratt London	Policy HOU01	Broadly support the approach taken which will seek a minimum of 35% affordable housing on all developments of 10 or more dwellings. However, it is unclear what "a minimum" requires, and whether the policy is aligning itself with the Intend to Publish London Plan FastTrack Approach, or indeed setting its own FastTrack approach at 35%.	Provision and delivery of affordable housing needs to accord with the NPPF and is within the context of the strategic London Plan minimum figure.	No
Redrow Homes	Policy HOU01	Clarification to part b) of the policy to allow any other form of affordable housing that comes forward and is defined as being an 'intermediate' housing product.	Part b refers to intermediate housing (in line with London Plan) and therefore includes any affordable housing product that is considered 'intermediate'.	No
Mayor of London	Policy HOU01	The Mayor welcomes the reference to his 50% strategic affordable target in draft Local Plan Policy HOU01 and at paragraph 5.4.8. In this regard, the reference to a 35% strategic target at paragraph 5.4.6 should be clarified as being a 50% strategic target or 35% minimum threshold for schemes of 10 or more residential units. As stated above under the Spatial Strategy (Estate renewal and infill) section, the policy and supporting text must ensure affordable housing floorspace is replaced. In line with Intend to Publish London Plan Policy H8, demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social-rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities. Draft paragraph 5.4.10 of the Local Plan states that the basis of calculations for affordable housing requirement will relate to a combination of dwellings, number of habitable rooms or floorspace. It should be noted that for schemes referred to the Mayor, the percentage of affordable housing will be calculated by habitable rooms in line with Intend to Publish London Plan paragraph 4.5.3. To be in line with Intend to Publish London Plan policies H4, H5 and H6, the affordable housing products must meet the definition set out in the Intend to Publish Plan.	Agreed – policy is consistent with the London Plan	Yes
Barnet CCG	Policy HOU01	Supports affordable housing policy, including the affordable housing tenure split and notes that the Council will support innovative housing products that meet the requirements of the policy.	Support for policy including affordable housing tenure split welcomed.	No
Marsfield	Policy HOU01	Update to state that this policy will be applied to SOPH proposals in line with the provisions of the new policy outlined above.	The Council does not consider a stand alone policy is merited	No
Taylor Wimpey North Thames	Policy HOU01	Support	The Council welcomes this support	No
Finchley Society	Policy HOU01	'Within the context of a strategic London Plan target of 50%' does not support Barnet's figure of 35% minimum. That figure of 35% will have to be increased.	The Mayor of London has indicated that he is happy with this approach	No
St William Homes LLP	Policy HOU01	Text as set out in para 2.2.1 ' <i>This Plan will seek efficient use of previously developed land and Barnet's existing housing stock. It will support opportunities for tenure diversity when it can bring development forward quicker</i> ' needs to be incorporated within Policy HOU01, relating to housing tenure.	The Plan supports efficient use of previously developed land. The approach to the housing stock has to be more nuanced in getting the balance right to address housing needs. Revise para 2.2.1.	No
Gwyneth Cowing Will Trust	Policy HOU01	The policy on affordable housing is unclear and allows the amount to either relate to the number of units, or habitable rooms, or the amount of floorspace. The council should continue with an approach which enables the amount of affordable housing required to be achieved either in terms of number of homes or the amount of floorspace	The policy wording will be amended to be consistent with the London Plan.	Yes
St William Homes LLP	Policy HOU01	Former utility sites are unique in both use and character; they are challenging and abnormally expensive to redevelop and regenerate compared to delivery of development on other brownfield sites. In addition, they can also have ongoing operational requirements requiring physical infrastructure and easements which can considerably reduce the developable site area. The further challenge for any developer on these typically complex sites is the quantum of upfront costs required to make the sites adequate for residential delivery – this impedes on a site's capability to deliver Council's minimum levels	There is no need to make specific reference as there is flexibility enough in HOU01	No

		of affordable housing. Whilst St William generally supports the Council's approach, the Plan needs to make reference to exceptional cases where a more flexible approach may be needed.		
Countryside Properties (Terrance O'Rourke)	Policy HOU01	On a related basis, Countryside are supportive of the provision contained in HOU01 for consideration to the specific circumstances of each site when seeking to replace existing affordable housing. This includes local infrastructure needs, local housing need in respect of tenure mix, affordability and tenure size, place-making, viability and the nature of the surrounding area. These factors are important considerations that can have a direct bearing on estate regeneration being brought forward. With regard to viability in particular, the nature of estate regeneration schemes is that they are often multi-phased and spread over a significant period of time, which makes them particularly vulnerable to economic changes through the life-cycle of the scheme. Ensuring that the policy environment is sufficiently flexible and responsive to these changes therefore is critical to ensure the continued successful delivery of estate regeneration in the borough. Any reference to a net increase in units should also be considered in the context of habitable rooms and floorspace to be applied as necessary.	This support is welcomed	No
Finchley Society	Policy HOU01(d)	We support this policy, but in practice the Council too often accept that there are exceptional circumstances.	The Council welcomes this support. Delivering affordable homes through the planning system remains complex.	No
Theresa Villiers	Policy HOU02	Disagree with conclusion in para 5.5.5 that 2 bed units qualify as family homes. Should be more emphasis on provision of houses rather than flats and also greater emphasis on garden space for new homes.	A well designed 2 bedroom home can provide 3 to 4 bedspaces. A 2 bedroom home with a minimum gross internal area of 61 to 70m2 can house 3 people while a 2 bedroom property of 70 to 79m2 can house 4. These space standards are set out in the London Plan as well as Table 9. Such well designed homes have a contribution to make to family accommodation. The Plan recognises that larger accommodation of 3 bedrooms or more remains the preferred size for family homes. Policy CDH07 sets out amenity space standards for new homes.	Yes
Finchley Society	Policy HOU02	Policy welcomed but It is not clear how it can be implemented except, say, in estate regeneration. Most developments are quite small, and what type of condition could ensure the desired mix?	Agreed. The Policy reflects priorities identified through the SHMA rather than prescriptive requirements. It therefore encourages delivery against these priorities.	No
Redrow Homes	Policy HOU02	Should specific that parts a and b are Borough-wide priorities that should be applied flexibly to individual schemes to ensure need is met at a local level. Registered providers may need flexibility to meet requirements.	Dwelling size priorities have been set based on evidence provided for the Borough, in compliance with NPPF. Parts c – f of the Policy are also considered in applying the preferred housing mix.	No
Barratt London	Policy HOU02	Housing Mix is identified for the next 5 years only but unclear whether this assessment has considered affordability, land optimisation and land availability. Therefore flexibility should be applied, it is recognised that the policy will consider 4 criteria in determining a suitable mix - viability of development is a critical determining factor and should be included. To ensure conformity with Policy H10 of the Intend to Publish London Plan, the following should be recognised in the policy and supporting text: Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to: [inter alia] the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity, the aim to optimise housing potential on sites, Important to allow flexibility to housing mix and therefore request that paragraphs similar to 4.10.3 and 4.10.4 of the Intend to Publish London Plan are included within this policy and supporting text.	Dwelling size priorities have been set based on evidence provided for the Borough, in compliance with NPPF. Parts c – f of the Policy are also considered in applying the preferred housing mix. There is no need to repeat the wording used in the London Plan as this forms part of the development plan for Barnet and therefore need to be considered together with policies in the Barnet Local Plan.	No

Pocket Living	Policy HOU02	90% of Pocket Living are single so there is a need to include smaller compact low cost homes for first time buyers.	HOU01 makes reference to innovative affordable housing products. Residential space standards remain an important element of the Local Plan and London Plan. The Council will continue to apply these minimum standards. .	No
Mary O'Connor	Policy HOU02	Homes should provide more space for flexible use such as people working and studying at home rather than trying to make units smaller.	Policy revised to reflect bedspaces and indicate how many people could be accommodated in accordance with space standards.	Yes
Marsfield	Policy HOU02	Update to state that the dwelling size priorities and housing mix criteria of HOU02 do not apply to proposals for SOPH in recognition of the distinct housing needs of this form of housing. SOPH proposals will be expected to provide a mix of dwelling types and sizes that demonstrably address identified local needs.	Requirements can be applied flexibly if there is no need in planning terms.	No
Client interested in North Finchley TC	Policy HOU02	Whilst our client recognises and supports the need to ensure that the right accommodation is delivered to meet identified needs, they would like to emphasise that the mix proposed within a residential development should be considered on a site-by-site basis having regard to circumstances in each case. It is noted for example, that some town centre sites may not be appropriate locations for the delivery of larger family units. This should be more clearly reflected in policy HOU02.	The Council considers that there is sufficient flexibility in Policy HOU02 to apply the preferred housing mix on a site by site basis. Regard to PTAL has been added as a further criterion.	No
John Cox	Policy HOU02	There is insufficient pressure on developers to supply family-sized homes. Barnet should offer some numbers to developers as targets. You will need supporting evidence, which you can hopefully provide. Incidentally, Brent already did all this in its draft Local Plan, and I submitted a stronger formula (presumably currently being considered): "For every odd number of four dwellings included within a development, at least one must be 3 bedrooms or more. For every even number of four dwellings included within a development, at least one must be 4 bedrooms or more." That means passing the 8, 16, 24, ... dwellings levels each adds an additional guaranteed home of 4 bedrooms or more. Any exceptions you choose to grant should not apply to larger developments, otherwise you discourage wider mixed communities. In aiming for percentage housing tenure targets on individual sites you should consider relaxing targets if it allows even more family housing in return. That is because of the obvious additional cost to developers of physically larger homes, but also the huge social stress within Barnet of families desperately needing more space.	The Council considers the policy is quite clear in delivering the right homes for the next generation, setting out priorities for housing mix and how we will apply it. We expect developers to address this in their proposals.	No
Elizabeth Silver	Policy HOU02	The proposed increase in housing density and the building of small 1-2 bedroom flats, means that the younger generation in London are going to experience lower standards of living. Para 5.5.3 - Add: Most units now being built are 1-2 bedroom flats and this discourages intergenerational living. 46,000 homes (BSS01) for 60,000 population means an average of 1.3 persons per unit, ie on average for 3 housing units, occupancy is 1,1,2 people. HOU02 – Housing Mix - Add: A larger proportion of family-sized units, meaning fewer but larger units to be built, than at present. This would save on overall space and encourage intergenerational living.	The Council considers the policy is quite clear in setting out priorities for housing mix and how we will apply it. We expect developers to address this in their proposals. We expect developers to address this in their proposals. The SHMA has not identified a specific need for intergenerational living but a reference has been made to multi-generational homes as a housing option and a definition added to the Glossary.	No
Brent Cross South Partnership	Policy HOU02	Suggest additional clarity that the appropriate housing mix for developments will be assessed on a case by case basis having regard to housing typology, local need and wider delivery patterns.	The Council considers the policy is quite clear in setting out priorities for housing mix and how we will apply it. We expect developers to address this in their proposals.	No
Federation of Residents Associations in Barnet (FORAB)	Policy HOU02	Table 6 (5.5.8) indicates the assessed need by number of bedrooms. We understand the overall need for one and two bedroom properties is 38%, with the rest three bedrooms or more. But as we know, as stated at 5.5.6, that 78% of what has been built is just one or two bedrooms, and that proportion is being perpetuated. and possibly increased in anticipated schemes. Whilst two bedroom properties are being described as family homes we consider this is unrealistic as an expectation of public acceptability	The Local Plan's approach is about reflecting needs and responding to market signals. Policy therefore needs to be flexible rather than prescriptive on housing mix. Whilst the Plan recognises that a well proportioned 2 bedroom property can be considered a	No

		except for those with low incomes who will have to put up what is on offer. Indeed reality is recognised in policy HOU02(a) identifying three bedroom properties as the highest priority for market homes, though there is a complete absence of measures that might achieve this. If the desired larger homes are not going to be built what alternatives are there? Again the plan falls short on ideas. There are no robust proposal to persuade singles and couples living in family homes to downsize. So as a minimum it is imperative that the existing stock of family homes is protected. Unfortunately the Plan is inadequate on mechanisms to do this, as we discuss later.	family home it is certainly not saying that all the need for family housing can be met by large 2 bedroom homes. Through application of Local Plan policy the Council is managing and shaping growth, helping to deliver sustainable places where people choose to live and stay. This requires a balanced approach to developments. It cannot be achieved by a focus on housing quantity over quality. The approach on Housing Mix (HOU02) has a very strong link with the bespoke policy on Housing Conversions (HOU03) and protecting the existing stock of family homes. Other than providing a mix of homes where people choose to live the Local Plan has no remit to persuade singles and couples living in family homes to downsize. Such incentives fall within the remit of the Government.	
New Barnet Community Association	Policy HOU02	Policy and market are indicating need for 3+ bedrooms but AMR indicates 1 and 2 bed are dominant type. Policy should require developments of 10 or more provide mix as outlined in Table 6	The Local Plan's approach is about reflecting needs and responding to market signals. Policy therefore needs to be flexible rather than prescriptive on housing mix.	No
Redrow Homes	Policy HOU02	Amend wording of part a) to remove reference to unit sizes and replace with 'The unit mix for market homes will be based on up to date market need'	The Policy is based on evidence set out in the Strategic Housing Market Assessment (SHMA) and follows NPPF requirement to meet the needs of different sectors of the community to create strong communities.	No
Fairview Estates	Policy HOU02	Policy HOU02 sets out the housing mix for Borough. The policy requires that developments should "provide a mix of dwellings types and sizes to create sufficient choice for growing and diverse population across all households in the Borough". However, the policy then states that the Council's size priorities were for 3 bedroom properties, with 2 or 4 bedrooms a medium priority, but provides no indication of the percentage mix of 3 bedroom (high) and 2/4 bedroom (medium) in order to meet their size priorities and ensure that a mix of dwelling types are provided within the Borough. The policy is therefore unclear and cannot be considered a justified strategy/policy for the Borough. We note that the three plus bedroom units are also the units which the council considers to be high priority within Policy HOU02. Therefore the council are seeking a greater provision of three plus bedroom units to be provided across the Borough. We considered this will create problems for larger scheme with developers unable to satisfy both Local and London plan requirements. The proposed parking standards will result in additional pressures on roads within Barnet and does not comply with National requirements for sustainable development. The policy is therefore unsound	The policy on housing mix sets out the Council's priorities for the size of dwellings and enables flexibility in determining an appropriate mix on a site by site basis. Getting the mix right depends on considering a number of criteria including location, site size and mix of uses. These are clearly set out in HOU02.	No
St William Homes LLP	Policy HOU02	The Council's approach to housing mix in Policy HOU02 requires private homes to be predominantly 3 bedroom and omits any provision of 1 bedroom homes, even if they are delivered as part of a mixed development. Consideration needs to be given to a more flexible approach to those sites within town centres, where often smaller units are more suitable. Additional criterion relating to a consideration of existing mix of homes surrounding a site should be added to the preferred housing mix criteria (point's c – f of policy HOU02). This will enable the delivery of a suitable mix of homes throughout the borough.	The policy reflects size priorities as part of a housing mix. The listed criteria already consider location and surrounding context. Parts c – f of the Policy are also considered in applying the preferred housing mix.	No
Friern Barnet and Whetstone	Policy HOU02	At para 5.5.5, it is explained that in Barnet one and two bedroom homes remain the dominant type of new accommodation delivered, accounting for 78% of new homes overall and 86% of flats. "In the past a family property would traditionally consist of three bedrooms or more. Many families now live in	We are not aware of any plans to introduce a 'one child' policy under the present Government.	Yes

Residents' Association		<p>two bedroom accommodation. Well designed two bedroom properties of between 70 and 79 sq. m gross internal area can now be considered as family homes." That families are living in two bedroom accommodation, well designed or otherwise, does not mean that such accommodation can be considered as family homes- it merely means that families are living in such accommodation because true family accommodation is not available at a price they can afford – or at all. Whilst we would accept that two bedroom accommodation can be suitable for the families with one or two very young children, as time passes and those children grow older such accommodation ceases to be suitable- in fact, it becomes unsuitable. In the long term, two bedroom accommodation can only be considered as suitable for a family with one child- certainly not for a family with children of more than one sex. Is Barnet intent of pursuing a Chinese- style "One Child Policy"? Para 5.5.5 needs to be re-written to make it clear that whilst it is recognised that many families are forced to live in two bedroom accommodation, this is often from necessity and that two bedroom accommodation cannot be considered as suitable for anything but the very smallest, or the very youngest, families.</p> <p>The second sentence of Para 5.5.10 should be amended to read " There is a significant need for family sized housing of 3 bedrooms or more to be provided as part of any market housing mix" Policy HOU02- Housing Mix: A mechanism and statement as to how the policy will be applied to individual proposals is required. Compliance should be expressed as a "requirement", not an objective ("seek"). This could integrate with the "Assessed need for housing type by tenure" contained in Table 6, with worked examples and rounding up to the larger sizes. For example, a 10 unit market scheme would be required to provide 3 2 bedroom, 4 3 bedroom and 3 4 bedroom (or larger) units.</p>	<p>A well designed 2 bedroom property can provide 3 to 4 bedspaces. A 2 bedroom property with a minimum gross internal area of 61 to 70m2 can house 3 people while a 2 bedroom property of 70 to 79m2 can house 4. These space standards are set out in the London Plan as well as Table 9 of the Reg 18 Local Plan. Such well designed properties have a contribution to make to family accommodation. The Plan recognises that larger accommodation of 3 bedrooms or more remains the preferred size for family homes. This is reflected in Policy HOU02</p> <p>The Council's aspirations on securing the right housing mix are exemplified by HOU02. This policy is more detailed than the 2012 Local Plan policy. It is not prescriptive. There is no simple requirement to deliver housing in accordance with the proportions outlined in Table 6 of the Reg 18. However Table 6 acts a guide reflecting the evidence base behind the Local Plan. Officers in getting the balance right on housing mix need to consider a range of factors such as site size, context including town centre location, character, mix of uses, range of tenures, potential for custom build and community led schemes. These criteria are now set out in Policy HOU02.</p> <p>Another significant policy change is an explicit reference to monitoring. This ensures that officers in decision making are informed by the current state of play on delivery of different sized homes. The Authorities Monitoring Report (AMR) sets out how we are doing in building the right homes for the next generation. We have revised HOU02 to align with residential space standards and clarify the number of bedspaces per new home. This will be reflected in the AMR.</p>	
London Diocesan Fund (Iceni Projects)	Policy HOU02	The Council have identified a particular need for 2, 3 and 4 bedroom properties across all tenures and there is a significant need for family sized housing to be provided as part of any market housing mix. Green Belt sites are often better suited to deliver family homes which is further reinforced by the character of the surrounding area of the site. The Council's current strategy will deliver a surfeit of flatted accommodation which will not meet the needs of the Borough.	We refer to our earlier responses about our approach to housing delivery and protection of the Green Belt	No
Clive and Gill Hailey	Policy HOU02 & Para 5.5.5	When did it become permissible to describe a one- or two-bed property as being a "family home"? Our understanding is that a family home has three or more bedrooms and these are in extremely short supply!	A family can comprise of 2 adults and 1 child – hence a well designed 2 bedroom property is capable of being described as a family home.	No
Barnet Cycling Campaign	Policy HOU03	When converting existing dwellings to increase occupancy, consideration should be given to provision of adequate and affordable cycle storage.	Agree	Yes

Finchley Society	Policy HOU03	We support this and suggest the stronger 'permit' for 'support' in the second line.	Agree to change. The Council welcomes this support.	Yes
Federation of Residents Associations in Barnet (FORAB)	Policy HOU03	Of concern to us is that the one way to deliver these extra homes around town centres would be to pursue intensification by converting wholesale existing family homes within 400 metres to flats or demolishing them and replacing with new blocks of flats, which indeed the plan as drafted is encouraging. Such an approach would destroy the existing community structure and would inevitably lead to a net loss of family homes, the protection of which we have already said should be essential to maintain the stock of these homes. There would be considerable public resistance to such wholesale redevelopment and given that the vast majority of new housing is already identified for dense high-rise developments, the comparative gains from town centre intensification would probably result in overkill in the provision of small flats. The Plan should draw back on this concept.	Policy HOU03 acknowledges the contribution of conversions to the housing supply. It is a bespoke policy supported by evidence setting out the circumstances and criteria needing to be satisfied before the Council would permit conversion of a house into smaller units.. This includes an assessment of Policy DM01 at appeal and a review of other London borough approaches to residential conversions. It does not support re-development of large family houses and does seek a family sized home in the converted property.	Yes
West Finchley Residents Association	Policy HOU03	Policy HOU03 is welcomed but would like to see it strengthened by specifying a percentage of larger family homes that should be protected and that clarification on the definition of 'character' should be provided.	Policy sets a more balanced and objective way to determine conversions. Further policy guidance on approach to character is set out in Chapter 6.	No
New Barnet Community Association	Policy HOU03	400 m excessive – should be 100m from TC boundary (or 400m from a single point in TC)	The 400m threshold is used consistently throughout the Local Plan and represents a reasonable walking distance.	No
Federation of Residents Associations in Barnet (FORAB)	Policy HOU03	Residential conversions - We welcome the initiative to bring some order to this area where consistency in allowing or refusing applications for conversion has not been evident. The Policy as drafted is based on the assumption that a larger family home of 3 – 5 bedrooms may be converted to flats if 'family' sized accommodation of 74m2 or more is provided at ground floor level. This means that two bedroom accommodation would be acceptable. This is not what is said in the text - 5.6.4 says at line 8 "providing 3 bedrooms". The requirement to provide a minimum of three bedrooms should appear in the Policy. And indeed, even with this qualification we remain concerned about the implications. Housing in streets characterised by family homes, irrespective of size, have largely been protected using existing policies. But this new definition will explicitly encourage conversions in certain areas which have larger family homes close to a town centre, e.g. East Finchley, North Finchley and Underhill. These areas overwhelmingly consist of family homes and we consider it essential they should remain that way to maintain the quality of life in the neighbourhood and ensure the stock of larger family homes is not diminished. We do not understand the argument why the existing defence in DM01 may not remain and ask that it be reinstated: "Conversions in roads characterised by houses will not normally be permitted".	The Council welcomes this acknowledgement of the new bespoke policy on Residential Conversions. It is considered that HOU03 will help achieve a better balance, protecting family homes while delivering new converted homes in the right locations. The minimum size for a 3 bedroom property is 74m2. Policy has been revised to clarify this.	Yes
TfL	Policy HOU03	We are concerned that the Council will only support the conversion of larger homes where 'appropriate car parking is provided in accordance with Policy TRC03'. This again appears to set a minimum required level of car parking provision, or at least a presumption that development is expected to provide car parking. Development proposals in well-connected locations should be car-free as a starting point, with 'car-lite' provision elsewhere, and provision should not exceed the maximum standards as set out in the Intend-to-Publish London Plan. Given that this policy also states that such conversions will only be supported in areas that are well-connected by public transport and are close to town centre amenities and services, there will be less need for a car in these locations. The policy should not refer to car parking, or at least allow for lower provision by referring to the restriction of access to parking permits.	The intent of the policy is to ensure that car parking is within the required standards outlined in Table 23; however, the text has been revised to reflect the Council's support for reducing car dependency in the Borough.	Yes
Friern Barnet and Whetstone Residents' Association	Policy HOU03	The principle of Policy HOU03 is welcomed, but the draft requires amendment: Rather than "the Council will only support.." proposals where the criteria a)-c) are satisfied, the language should be firmed up- "the Council will require that... (with consequent redrafting). Paragraph b): 74 sq.m. GIA does not constitute a "larger family sized home". See above. The minimum should be increased. 74 sq. m. is	The minimum size for a 3 bedroom property is 74m2. Policy has been revised to clarify this. Para c has also been revised. Policy has also been revised to clarify	Yes

		appropriate for a 2 bedroom property , not 3 bedrooms (Compare with para 5.5.5 (commented on above) The “location test” at a) is all very well, but it will encourage conversions of family homes close to town centres. We believe that the current DM01 policy has great merit and should be included in HOU03d(see below) Further , clear wording to shut out other types of proposal is desirable, such as - proposals for conversions of smaller homes (of less than 130 sq. m. original GIA) will be refused - proposals for conversions outside locations within an area falling within a) and also proposals for conversions in streets characterised by houses within an area falling within a) will be refused - in para c), additional text should be included to prescribe the minimum original area where more than 2 units are to be formed	that we will only permit those proposals that meet the listed criteria.	
West Finchley Residents Association	Policy HOU03	Demolition and redevelopment – referring to loss of larger homes replaced by smaller apartments.	The principals behind Policy HOU03 with regard to residential conversions and protecting family housing also need to be applied with re-development of such accommodation. HOU03 revised to reflect this. Cross-reference made to CDH01.	Yes
Clive and Gill Hailey	Policy HOU03 & Para 5.6	Barnet has suffered from an unacceptable number of developments where one or more lovely family homes are acquired, demolished and replaced with often badly designed Apartment blocks, usually at high-end prices. Would therefore welcome the policy if it were to be much stronger so as to prevent this type of conversion or development in roads now consisting only of houses. Must maintain the individuality & character of such roads and areas.	An acceptable balance needs to be struck between preserving the supply of family homes and increasing housing provision, and therefore densities, in more sustainable parts of the Borough. This is the aim of HOU03 which is a bespoke policy supported by evidence that sets out the circumstances and criteria needing to be satisfied before the Council would permit conversion of a house into smaller units.	No
Barnet Cycling Campaign	Policy HOU04	Proposals for student accommodation should also demonstrate that they are easily accessible by public transport, cycling and walking, particularly between the accommodation and the educational establishment.	Agreed	Yes
Mayor of London	Policy HOU04	Proposed Local Plan Policy HOU04 should make it clear that specialist older persons housing provision should be delivered in line with Intend to Publish London Plan Policy H13, including the requirement for affordable and accessible housing.	Agreed	Yes
Lansdown	Policy HOU04	There is a good evidence base underpinning the discussion of specialist housing for older persons (SHOP). Adhering to the draft London Plan targets for SHOP units will have significant benefits, including maintaining independence for the elderly for longer, releasing under-occupied housing to the wider market and reducing costs to Adult Social Care and the NHS. Although the draft Plan indicates an priority for extra care over care homes, it is important that care home applications are considered on local need as there can still demonstrably be a need for this type of accommodation in certain areas of the Borough. The alternative options for Policy HOU04 clearly would not provide a more beneficial outcome than the proposed plan.	HOU04 sets out the Local Plan approach to residential care homes.	No
LB Barnet Estates	Policy HOU04	Housing choice must also be widened to include the needs of students who may due to a disability or impairment struggle to find accessible purpose-built accommodation that meets their needs and that is located close to where they study.	Developers of student accommodation are required to meet the accessibility requirements of the Building Regulations . London Plan Policy D7 states that at least 10% of dwellings covered by Volume 1 of Part M of the Building Regulations should provide wheelchair user dwellings and the remainder meet M4(2) being accessible and adaptable dwellings..	Yes
John Cox	Policy HOU04	You consider ‘Housing Choice for Older People’ in Para 5.7.1, but nothing ends up in the Policy. Developers should be required to consider placing this type of specialist housing alongside community facilities like child nurseries and infant schools, given the strong international evidence of improved	HOU04 is clear with regard to benchmark targets, appropriate locations and providing choice for people with social care and health support needs. It includes specific reference at Part 1b to delivering older	No

		social well-being to both generations (and possibly those generations in between) from such arrangements.	persons housing in line with the London Plan (London Plan Policy H13 specialist older persons housing and Table 4.3 refer).	
Marsfield	Policy HOU04	Our specific policy comments are as follows: Remove content related to SOPH, Insert a new standalone policy to cover SOPH. This should : support the provision of 4,125 SOPH homes over the period 2021-36 (275 per annum); Define the types of housing covered by the policy (we recommend using the draft London Plan Policy H13 definition for the purposes of consistency), which should incorporate flexibility to accommodate future changes in this rapidly evolving sector; Identify qualitative site suitability criteria; cross-refer to Policy HOU01 and set out distinct requirements for affordable housing associated with SOPH: Council will seek affordable housing from SOPH developments of 10 or more dwellings. To follow the Fast Track Route applications should; Provide a minimum 35% SOPH affordable housing on-site; This can comprise up to 100% intermediate tenures (confirm that the 60:40 affordable housing tenure split defined in Policy HOU01 does not apply to SOPH) Alternatively, the Viability Tested Route can be followed: The maximum viable % of SOPH affordable housing should be provided; This can comprise up to 100% intermediate tenures; This can be provided off-site (or via financial contribution in-lieu) where on-site provision is unfeasible and/or this would give rise to demonstrable benefits Cross-refer to Policies, and note that a flexible approach will be taken to the application of these policies on a case-by-case basis taking into account the specific characteristics of the proposal.	Policy HOU04 is consistent with the London Plan and the Council does not consider a stand alone policy is merited. HOU04 sets out clear criteria for different housing choices and the separation of these different types of specialist housing will not impact the delivery of 275 new specialist older persons homes per annum. The delivery of these new homes will be monitored through the AMR.	No
Barnet CCG	Policy HOU04	Supports this policy - which recognises the need to provide a wider range of housing options for older people, reducing a reliance on residential care homes to enable people to live more independent lives for longer. Also, an increase in homes which support people with complex and nursing care needs will support a shift in healthcare 'closer to home' and reduce pressure on hospital services (paragraph 8.6.6).	Support welcomed.	No
Marsfield	Policy HOU04	In order for the Local Plan to be sound, it must include the following policy content in respect to SOPH: Support for the delivery of at least 275 SOPH per annum. In our view this should be planned for separately to other forms of specialist residential accommodation due to the scale of the need (i.e. a distinct policy); A clear definition of what types of housing are covered by the SOPH policy. This should incorporate flexibility to account for the many different types that fall within this which do not fit neatly into traditional definitions (either use class or 'product'), and which will likely evolve significantly over the plan period; Identification of sites that are suitable for SOPH; A clear policy position regarding affordable housing and SOPH that ensures the deliverability of this type of housing. This should be a distinct policy position to that which applies to general needs housing that takes account of the distinct operating characteristics and viability considerations associated with SOPH, by allowing flexibility on tenure split and/or off-site provision, in order to allow it to compete equally with general needs housing for sites; and clarity that general needs housing 'standards' (e.g. car parking, cycle parking, playspace, housing mix etc) should not be bluntly applied to SOPH where it can be demonstrated that an alternative bespoke approach would be more appropriate	The London Plan already includes a policy (H13) covering specialist older persons housing and the Council does not consider a bespoke policy is required in the Barnet Local Plan on specialist older persons housing. When such proposals come forward the Council will consider the specialist nature of the housing in terms of policy requirements set out in both plans.	No
Mill Hill Missionaries	Policy HOU04	It is therefore suggested that the figure of 275 new specialist older persons homes per annum is replicated in a standalone policy to reflect the clear need for this particular type of housing. Although London is a relatively young city, the GLA expects those aged 65 and over will increase by 37% over the next decade. Having a clear policy against which delivery in this sector can be tracked is therefore essential.	The Council does not consider a stand alone policy is merited. HOU04 sets out clear criteria for different housing choices and the separation of these different types of specialist housing will not impact the delivery of 275 new specialist older persons homes per annum. The delivery of these new homes will be monitored through the AMR.	No

New Barnet Community Association	Policy HOU04	Needs to be more creative in considering needs of over 65 population – not just vulnerable old people.	The Council's priority is for providing housing options for older people with social care and health needs. Innovative design is encouraged by the Local Plan.	No
Brent Cross South Partnership	Policy HOU04 & HOU06	As noted above, purpose-built BtR should be excluded from license requirements.	The Council does not expect genuine Build to Rent to fall under the HMO licensing regime	No
Finchley Society	Policy HOU04(2)	Add (f) 'New HMOs must comply with the Council's standards of space and accommodation.'	Agreed	Yes
Mayor of London	Policy HOU05	In line with Intend to Publish London Plan Policy H2, the borough's approach to housing design, extensions and conversions should note that local character evolves over time and will need to change in appropriate locations. In this regard, Barnet should set out where and how small sites are likely to come forward for the Council to meet its minimum small sites 10-year target of 4,340 home set out in Table 4.2 of Intend to Publish London Plan and its own commitment to deliver 5,100 homes on small sites. Town centre type uses such as health facilities, children's nurseries or education uses should be directed to town centres. Where there is a demonstrable need for these types of facilities within residential neighbourhoods Barnet should seek to re-provide or increase the residential floorspace on-site, including through extensions to the property so that a residential unit is not lost. With regards to Policy HOU05b, if a site is no longer environmentally suitable for residential use, it is unclear how it may be suitable for other sensitive uses such as a children nursery or health facility. With regards to Policy HOU05c, as stated above, the policy and supporting text must ensure affordable housing floorspace is replaced. In line with Intend to Publish London Plan Policy H8, demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace.	Small sites delivery clarified by Policy CDH01	Yes
Former MHNF	Policy HOU05	1a) This policy should not be allowed in Green Belt or in a Conservation area. "No inappropriate development" in the Green Belt is defined in NPPF paras 145 and 146 and we expect Barnet Council to take serious enforcement action against any potential infringements.	Applications should have regard to Policy ECC05.	No
Finchley Society	Policy HOU05	There should be something in this policy about holiday lets.	As there is a legal basis for managing holiday lets a reference in HOU05 is not merited.	No
Modomo (Modular Housing)	Policy HOU05	Remove from part 4 'Through the Local Plan Schedule of Proposals' as this is overly restrictive	Wording revised	Yes
John Cox	Policy HOU05 & GSS10	You should have a policy of no loss of social rented housing. You should collect data long-term on what housing loss happens in the borough, and of what tenure, to inform future policy. You should also encourage other council departments to monitor and document changes in levels of poverty and deprivation in redeveloped areas.	Revisions to the London Development Database enable the Council to better monitor changes to the housing supply. The Local Plan can only affect what comes forward through the planning system.	No
Mill Hill Missionaries	Policy HOU06	A clearer policy approach would be to identify enough self / custom-build sites to meet the level of need rather than rolling-forward targets onto future Development Plan documents.	Barnet's approach is realistic. Entrants on the Self-Build and Custom Housebuilding Register represent an exceptionally small proportion of Barnet's objectively assessed housing need.	No
John Cox	Policy HOU06	Given the overwhelming need for social rent homes, and the increasing numbers of approved Build to Rent developments in London with no 'low cost' rent at all, schemes are failing to meet the most pressing housing need. Your policy refers to 'London Plan Policy H13 Build to Rent', but that doesn't exist in the 'Intended to Publish' version published by the Mayor. Barnet's tenure requirements for Build to Rent developments need clarification. It would not be sufficient, for instance, to provide 100% of their 'affordable' housing as London Living Rent, and requires a significant proportion of social rent (as Southwark's viability-tested draft Local Plan does). Have you carried out a viability study on this subject?	Reference to London Plan Policy H11 has been updated	Yes

Mayor of London	Policy HOU06	The Mayor welcomes Barnet's positive approach to Build to Rent development, noting its distinctive economics and ability to contribute to the delivery of new homes. Under the Schedule of Proposals (Annex 1), Built to rent could be an option for accessible sites that are suitable for housing.	The Council welcomes this support.	Yes
National Custom and Self-build Association	Policy HOU06	Needs to demonstrate how the Plan will proactively assist self-build in line with legislation to include: Allocation of small sites specifically, Exception sites policy for self-build (less than 20 units in areas outside of settlement limits), Requirement for large sites to include self-build plots (2-6%)	Barnet's approach is realistic. Entrants on the Self-Build and Custom Housebuilding Register represent an exceptionally small proportion of Barnet's objectively assessed housing need.	No
TfL CD	Policy HOU06	Include a planning policy to promote the development of Build to Rent housing which is broadly in line with Policy H11 (Build to Rent) of the Draft NLP.	This is covered in HOU06	No
St William Homes LLP	Policy HOU06	We question the need for policy HOU06, as this merely repeats London Plan policy and therefore is not needed locally - the current preferred approach is not supported and the alternative of a 'no policy option' should be taken.	We consider that a policy on Meeting Other Housing Needs is merited given Barnet's significant housing target.	No
Environment Agency	Policy HOU07	We recommend a policy criteria is included that the site is not located in an area at high risk of flooding from rivers taking into account climate change to ensure residents and occupants are safe.	Agreed	Yes
John Cox	Policy HOU07	I disagree with you when you claim: "The Council can demonstrate that there is no objectively assessed need for pitches and plots for Gypsies and Travellers and Travelling Showpeople households.". You cannot. Your evidence base and policy have been unsoundly produced, and are likely to be fought at the Reg19 stage if you do not act more responsibly and equitably as a London borough with shared responsibilities for the city. Although not a planning issue, there have been decades of well-documented discrimination and racism against these groups from the political leadership of Barnet. You are simply perpetuating that. The earliest possible provision within the Growth Areas should occur, to allow early and stable links to be made within the wider incoming communities, and to provide early school-settlement, job and training opportunities.	Local evidence on the GTNAA has been updated, re-assessed and published.	Yes
Angie Hudson	Policy HOU07	Questions derivation and accuracy of statement in WLA report on Gypsy, Traveller and Travelling Showpeople Accommodation Assessment October 2018, that there were no Gypsies, Travellers or Travelling Showpeople identified to interview in Barnet. Representor states that she visited a site of five caravans, parked in the car park of Bethune Park in N11 on December 6th, 2019. Provides data from the Next Door App between May and December 2019 covering "South Whetstone" citing evidence that Travellers had been resident in the borough during this seven month period and suggest that this information will also be available to the Safer Neighbourhood Team, the Courts, the local Councillors and local MP who was also lobbied for their removal.	Local evidence on the GTNAA has been updated, re-assessed and published.	Yes
Mayor of London	Policy HOU07	It is noted that the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2018 identifies no gypsies and travellers and travelling show people in Barnet and therefore no demand for pitches. However, the 2011 census suggests there is a small population of gypsies and travellers in Barnet. It would be helpful to understand if this population is still present or if residents have moved elsewhere in London. In line with the Panel recommendation, the Mayor will initiate and lead a London-wide Gypsy and Traveller accommodation needs assessment, and will work to support boroughs in finding ways to make provision for Gypsy and Traveller accommodation. The Mayor would welcome a proactive approach to identifying potential Gypsy and Traveller sites in Barnet. Any sites that come forward in Barnet could help address the need for pitches that arises from its partner West Alliance boroughs, Brent (minimum 90 pitches), Ealing (minimum 31 pitches), Harrow (minimum 3 pitches), Hillingdon (minimum 60 pitches), Hounslow (minimum 40 pitches).	Local evidence on the GTNAA has been updated, re-assessed and published.	Yes
LB Haringey	Policy HOU07	GTTS definition from PPTS rather than Mayor's definition. Para 4.14.8 of Intend to Publish Plan refers to a London-wide needs assessment which should be taken into account if completed before adoption.	Local evidence on the GTNAA has been updated, re-assessed and published. This will be reflected in our Statement of Common Ground	Yes
Former MHNF	Table 6	We note from this table that 70% of demand in Market Housing is for 3/4/5+ bedroom properties, and in Affordable Housing it is 44% of the total. This supports our view that the number of houses needed is	The housing target is a minimum of 35,460 new homes. This is in line with the London Plan	No

		much lower than the figures suggested to house the expected population growth. 3/4/5-bedroom houses would normally have, on average, 3/4/5 occupants. However, we are concerned that unless occupancy levels are correctly evaluated in this plan, demands on necessary infrastructure will be underestimated. As an example, in the Pentavia application for 844 homes the GLA officers' report suggested that there would be only 1431 occupants. A more likely assessment of occupancy would have been as follows: Table 12 Overall Housing Mix - Unit Size Units % Mix - Studio 4 0 - 1 bed 201 33 - 2 bed 436 52 - 3 bed 123 15 - Total 844 100 Studios = 1 person, 1 bedroom = 1.5 persons, 2 bedroom = 3 persons and 3 bedroom = 4 persons. Thus, total 2225 persons. This increases the number of GPs required for example by 55%, and would have a similar impact on school places, transport needs, parking spaces etc. By allowing developers, in their applications, to quote a much lower occupancy level, the required infrastructure will be in deficit for many years to come.		
Brent Cross South Partnership (DP9)	Chapter 6	Flexibility should be applied in the interpretations of these policies to allow for site specific considerations to be taken into account, and we consider that maximum height thresholds are not necessary in order to ensure good design, and should instead be replaced by requirements for heights to be contextual and respond positively to local and wider surroundings.	It is important for the Plan to set out clear policy on building heights emphasising the strategic locations where tall buildings may be acceptable.	No
HADAS	Chapter 6	Since the light touch review of Barnet in 2007 there has been significant new work undertaken on the archaeology of Barnet and in advance of any full review HADAS considers that there is evidence that would support the extension of a number of the APA's currently identified in the plan. (<i>detail provided in response</i>) East Barnet, East Finchley, Galley Lane, Hendon. HADAS would be pleased to help define the extent of these boundary changes in advance of the formal review with Barnet and GLAAS to put into the Preferred Option Local Plan.	We will revisit APAs as part of the new look Local Plans proposed in the Planning White Paper This will enable consideration of new evidence on APAs produced in 2023/24.	No
Mayor of London	Chapter 6	The Mayor welcomes Barnet's opening statement in this chapter that notes as the borough grows its character will inevitably change – an important role for the Local Plan is to manage change. In addition to its design policies and Residential Design Guidance SPD, Barnet should produce design codes to bring forward development, especially on small sites. The Mayor welcomes the reference to the Agent of Change principle to protect existing residential amenity. He also welcomes the proposed approach to sustainable design and construction and the reference to the Mayor's Energy hierarchy.	Agree. Revised to clarify approach on design codes	Yes
Canal & River Trust	Chapter 6	The Brent Reservoir (Welsh Harp) has significant heritage importance within LB Barnet and is part of the industrial heritage of the London canal network. Local Plan should recognise its heritage value through local-designation and encourage development to protect and enhance its historic character. None of its structures are designated heritage assets within LB Barnet but the protection and enhancement of this waterway infrastructure is important in its own right, as part of historic transport infrastructure. Equally, so is the protection and enhancement of the spaces around it, which impact on the setting of the historic reservoir. The reservoir has a fascinating history - NPPF para 185 states Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. The reservoir would be able to support all of these aims more effectively if its historic significance was more appropriately recognised within the Local Plan. The reservoir should at least be recognised as a non-designated heritage asset within the Local Plan.	The Plan highlights the Welsh Harp.as a destination location	No
Middlesex University (Tibbalds Planning)	Chapter 6	<u>Tall Buildings</u> The University therefore welcomes the recognition within the draft Local Plan that tall buildings can form part of a strategic approach to optimising the capacity of sites which are well-connected by public transport and have good access to services and amenities, and in particular that they can become a valued part of the identity of places such as Colindale (Paragraph 6.16.2). The identification of the Colindale Growth Area as an appropriate location for tall buildings is also welcomed.	The Council welcomes this support.	No
Friern Barnet and Whetstone	Chapter 6	Whilst the draft plan contains many references to "good design", "exemplary architecture" and the like, we were unable to find any reference to "beauty". We suggest that reference should be made to the "Building Better, Building Beautiful commission report" and the draft plan then updated to incorporate	The Plan has been revised to make more references to the BBBB Report	Yes

Residents' Association		the appropriate principles. Good design may be purely utilitarian and that is not good enough for our Borough.		
Former MHNF	Chapter 6	High quality can be achieved without high cost. Emerging technology-based developments in building technology should be actively embraced in order to lower costs while improving quality. Developers must be encouraged to introduced new technologies while ensuring sustainable and distinctive design. We have already commented on Public Realm in Barnet. It is generally of a low standard, designed in order to lower price, rather than to produce an attractive design that is readily maintainable for a long life, with sustainable design which will mitigate climate change.	These issues are addressed in the Local Plan. We agree that high quality and beautiful buildings do not necessarily have to come at a high cost.	No
Elizabeth Silver	Section 6.11	Gas-fired power stations, as proposed for Partingdale Lane, do not fit in with the aim of making London a zero-carbon city by 2050. The one proposed for Partingdale Lane has a large footprint and is highly polluting (CO2); it gives off a lot of waste heat, harms the Green Belt site and disrupts wildlife.	The application 20/4241/FUL was for installation of a battery storage facility including inverter and transformer stations, battery storage containers, other associated infrastructure works, security fencing and lighting	No
Brent Cross South Partnership (DP9)	Section 6.16	The Tall Buildings Update (2019) document provides an overview of how building heights will be considered throughout the Borough and defines tall buildings as those between 8 and 14 storeys and very tall buildings as those that are 15 storeys and above. The document states "Buildings above eight storeys tend to take on the attributes of a tall building in a context such as Barnet". Borough-wide context is very broad and does not take account of local characters within the Borough, and the Growth/Opportunity Areas in particular. We support the recognition in Section 6.16 of the draft Plan that tall buildings may be appropriate in Opportunity Areas including Brent Cross, and suggest that this section recognises that tall buildings outside of the identified parameters can be acceptable where they respond positively to context (both existing and emerging).	Tall buildings are not acceptable outside the strategic locations	No
Finchley Society	Para 6.12	Because of our ageing population multigenerational developments should be prioritised by builders - there is now a strong international movement driven by AAA (Agile Ageing Alliance). There will soon be a need for young and old to benefit from living close to each other.	The Local Plan generally supports developments that are multigenerational. Reference added to Housing Chapter and definition added to Glossary.	Yes
Finchley Society	Para 6.11.3	Major development must be in line with these provisions. Money towards carbon offset should be a last resort.	This reflects London Plan policy	No
Finchley Society	Para 6.12.1	This, as with energy efficiency (6.11.4 above) may need nuancing in respect of extensions to heritage buildings.	Para 6.27.1 reflects the energy efficiency aspect of historic buildings. It also refers to the Guidance on the thermal improvements of historic buildings available on the Historic England website.	Yes
Finchley Society	Para 6.10.1	All these Supplementary Planning Documents must be updated; at present they refer to the previous Local Plan and London Plan.	The Council is committed to updating these SPDs. This is highlighted in the Local Development Scheme.	No
TfL	Para 6.14.1	Standard 18 of the Mayor's Housing SPG published in early 2016 has been superseded by the Intend-to-Publish London Plan policy T6.1 H. Disabled persons parking should not be allocated specific dwellings unless within the curtilage of the dwelling, as Blue Badge holders may not necessarily live in the wheelchair user dwellings of a development at any given point in the lifetime of the development. We suggest that disabled persons parking is dealt with solely in the transport section of the local plan.	Agreed	Yes
Finchley Society	Para 6.15.2	The penultimate sentence is an example of 'one size fits all'. There must be a place for local traditional patterns. 6.15.3 and CDH03a recognise this; the potential conflict between the two should be admitted.	This is not 'one size fits all' . There is a need for consistency in terms of design and quality as highlighted by Legible London. That does not prevent local variation.	No
Finchley Society	Para 6.15.3.	The conflict between proper public lighting and light pollution (and the cost to the local taxpayer) must be recognised, and how best to resolve it discussed.	This is a matter that should be covered by the emerging Sustainability Strategy	No

Theresa Villiers	Para 6.16	Suggest that tall buildings are redefined as five storey as there is a default acceptance of seven storeys as appropriate and this is not the case, particularly where 2/3 storey is predominant. Noting the commitment to heritage asset significance, then proposals such as the TfL 7 storey block along the A1000 at High Barnet is not acceptable.	The definition of a tall building remains at 8 storeys or more. The height of each proposal needs to be considered on its merits and there is no default acceptance of 7 storeys as being acceptable. Policy CDH04 revised to clarify this.	Yes
Finchley Society	Para 6.16.1	Why is ordnance datum thought appropriate? Some parts of Barnet are higher above sea-level than others, and it is against the local land surface that people perceive the height of a building.	Above ordnance datum has been replaced by above ground level	Yes
Former MHNF	Para 6.16.1	It is vital that these guidelines are strictly adhered to.	Support welcomed.	No
Dr P. M. Ashbridge	Para 6.16.2	After "activity", add: "but tall buildings can also remove human activity to higher and invisible levels - tending thereby to dehumanise a townscape at street level and attract security problems."	Whilst this can be true for poorly designed and situated tall buildings not necessary to revise the wording in the plan.	No
Finchley Society	Para 6.16.2 & CDH04 last para.	It is easy for developers to claim that their buildings are of exemplary architectural quality, and there should be better definition and cases cited if the refusal of applications is to be defended.	References added to National Design Code which sets out what good design means	Yes
Former MHNF	Para 6.16.3	We totally agree. This must be adhered to.	Support welcomed.	No
Barnet Society	Para 6.16.4	Welcome intention to produce an SPD on Building Heights setting out parameters for tall buildings.	Support welcomed.	No
Finchley Society	Para 6.16.4	It will be essential to have this SPD, at least in draft, by the next consultation stage, so that consultees can really assess the policy.	SPD delivery set out in the LDS	No
Former MHNF	Para 6.16.5	Why was Pentavia agreed to? Five Ways Corner is NOT an Opportunity Area, nor is it one of the designated corridors for Tall Buildings in either the current or draft Local Barnet Plan.	The Pentavia Park proposal has been withdrawn by the applicant	No
Finchley Society	Para 6.16.7	We fully agree that Barnet should be considered as a largely low-rise borough in terms of character and townscape. The presumption against developments based upon tall buildings should be maintained, except in Opportunity Areas. Well designed compact developments should be preferred to developments based upon tall buildings.	The Council welcomes this support.	No
Historic England	Para 6.16.7	– we are very pleased to see that the plan advocates a proportionality approach which encourages the delivery of denser development without resorting to a tall building.	The Council welcomes this support.	No
Former MHNF	Para 6.16.8	The diagram shows FOUR locally important views across Barnet. We have identified at least eight more inside Mill Hill alone. There must be many more across Barnet as a whole.	These cross-borough views are long established and it is important that they continue to be safeguarded. No additional views of equal importance have been identified as part of the evidence work on Tall Buildings in 2010 and the Update in 2018.	No
Barnet Society	Para 6.16.8 & Map 4	More than four views need safeguarding. In Chipping Barnet, the 360° panorama around Whittings Hill is remarkably green and unspoiled despite the proximity of extensive suburbs. Others need identifying as a matter of some urgency, ideally in conjunction with the SPD on Building Heights.	These cross-borough views are long established and it is important that they continue to be safeguarded. No additional views of equal importance have been identified as part of the evidence work on Tall Buildings in 2010 and the Update in 2018.	No
Finchley Society	Para 6.17.2	This is an unsatisfactory analysis. Permitted development must be taken as a given, which restricts the control the Council has. Obtrusive and incongruous dormers can ruin views from the rear and particularly near open space cause visual pain	This Government is encouraging greater permissiveness and the Plan has to work within these parameters	No
Dr P. M. Ashbridge	Para 6.18.1	After "flood risk", add: "and water-table problems for the roots of existing well-established trees."	Agree.	Yes
Finchley Society	Para 6.18.1	The potentially serious implications identified are there with basements that are permitted development as well.	The larger extensions are the ones that the planning system has more control over	No

Finchley Society	Para 6.19.2	This paragraph should be replaced by a more realistic one. In town centres, especially conversions over shops etc., there will not be private amenity space. Often proximity to a park is accepted as equivalent.	This reflects the Council's approach to improving the public realm in town centres.	No
Wade Miller-Knight	Para 6.19.3	Noted objection to tall buildings and provision of additional internal living space to compensate for lack of outdoor space (as this could become space for lodgers). Seems more reasonable to reduce height of buildings and only approve when there is adequate outdoor space provision.	New development should provide the minimum standard space requirement, in line with the London Plan. It will have to be demonstrated that this provision is not possible to allow alternative consideration for equivalent internal living space. The level of provision would not represent an additional room for lodgers.	No
Finchley Society	Para 6.19.3	The Plan must say what sort of a Planning Obligation will be sought, and what it may be designed to achieve.	The Planning Obligations SPD will go into more detail	No
Finchley Society	Para 6.19.5	This clear policy is supported	We welcome the support.	No
Theresa Villiers	Para 6.20	Welcome this inclusion in the Plan and further reason to reject the planning application for development at Whalebones in High Barnet.	We welcome the support.	No
Finchley Society	Para 6.20.2	First sentence. Any? Surely only ones over a certain size.	Agreed	Yes
Finchley Society	Para 6.20.3	This policy is supported.	We welcome the support.	No
Clive and Gill Hailey	Para 6.20.6	Back Land developments / garden grabbing must be prevented; access to proposed back land / garden grabs must be a planning consideration - developers must prove they have permission to access the land with vehicles, machinery and the supply of utilities over/under suitable access roads.	Refer to previous response on back land development	No
Finchley Society	Para 6.20.6	This paragraph should distinguish front and back gardens. The never-ending destruction of front gardens, turning them into car parks, must be stopped. The consequence of a dropped kerb is less parking for the general public (The enforcement of all the requirements in the Vehicle Crossover Policy is almost impossible to monitor and requires high levels of manpower.) It is now more important than ever to retain front gardens because of the effect on climate change (cf Policy ECCO1). In February 2016 the London Assembly agreed a motion promoting lawns, flower beds, rain gardens and other vegetation over paving. Artificial grass should be discouraged in front and back gardens.	Within the parameters of the planning system the Plan encourages the retention of front gardens and recognises the damage done by Vehicle Crossovers.	No
Dr P. M. Ashbridge	Para 6.20.6	Add at the end: "Infilling through the building of houses or flats on green suburban back-gardens should always be resisted."	This was already reflected in para 6.20.6.	No
Historic England	Para 6.21.2	The NPPF (paragraph 195) tells us that substantial harm or loss of a grade II listed building or Grade II RPAG should be exceptional, while substantial of or loss to a scheduled monument, registered battlefield, Grade I and II* listed buildings, and Grade I and II* RPAGs should be wholly exceptional. The NPPF goes on to say that development causing substantial harm should be refused unless the harm is outweighed by substantial public benefits. The wording in this paragraph states only that such work would be resisted takes a more relaxed view than outlined in the NPPF.	Agreed	Yes
HADAS	Para 6.21.2	The second sentence here is rather different in formulation from that in paragraphs 193 to 198 of the NPPF. It is unlikely any difference is intended, or that the Plan would be sound if it were. The sentence should therefore be reformulated or omitted and replaced by a reference to the NPPF; the wording of Policy CHD08 is appropriate and may be all that is needed. The following sentence should be added: <i>'Applications to demolish a listed building in whole or in part will be notified to the National Amenity Societies in accordance with the Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2015).'</i>	Agreed	Yes
Historic England	Para 6.21.3	The 4 designated Registered Parks and Gardens are designated because they are of importance and possess special interest, they are not of special interest because they are designated. This section of plan does not acknowledge that significance goes beyond the grade of designation. This is a crucial	Agreed	Yes

		distinction to make and is the starting point for understanding their significance, significance is more than being designated – it is why heritage assets are designated.		
Historic England	Para 6.21.4	Regarding terminology it is convention to simply refer to scheduled monuments rather than scheduled ancient monuments; this is to reflect the fact than many scheduled monuments are relatively recent. This applies to the plan as a whole. It is also important for the policy to make clear that any applications that have the potential to impact any undesignated archaeological heritage assets should be supported by an archaeological desk based assessment. The aim of the assessment is to identify the scale and significance of the archaeological impact. An archaeological field evaluation may also be necessary.	Agreed	Yes
HADAS	Para 6.21.5	Replace 3r sentence by: <i>'Development proposals in these areas will be the subject of consultation with the Greater London Archaeology Advisory Service (GLAAS), who may require the attachment of an Archaeological Condition to ensure that any archaeological remains are properly investigated and where appropriate preserved. The recommendations of GLAAS will be followed. In some circumstances a major development outside Archaeological Priority Areas may merit an archaeological condition.'</i>	Agreed	Yes
HADAS	Para 6.21.6	. 'issues' in the third line should be 'assets'. Add at the end <i>'The Council has established Conservation Area Advisory Committees who will be consulted about any development proposal in a Conservation Area. The Council is reviewing the structure and operation of these committees to ensure that they operate as efficiently and effectively as possible.'</i>	Agreed	Yes
British Sign and Graphics Association	Para 6.22.2	Para 6.22.2 demonstrates a total misunderstanding about Areas of Special Control of Advertisements (ASCAs). The Council's 2006 UDP did not 'designate' an ASCA nor can ASCA designation be 'retained and revised' through the local plan process.Regulation 20ff in the 2007 Control of Advertisements Regulations specifies the procedure for ASCA orders. All ASCA orders (or amending orders) must be approved by the Secretary of State (Regulation 20(3)). The local plan system can neither create no amend ASCAs. Barnet's ASCA must remain as approved by the Secretary of State. Para 6.22.2 must be amended to state the law correctly; and, if necessary, the plan (Map 5) must be altered to show only that area which is within an ASCA approved by the Secretary of State.	Agreed.	Yes
Brent Cross South Partnership (DP9)	Para 6.3.1	Note evolution of character in growth areas as per comments on Section 2.1.	Agreed Text added to reflect that character can change as set out in Chapter 2	Yes
Finchley Society	Para 6.3.2	The Characterisation Study is ten years old. A date should be given for the next one.	There are no plans at present to revise the Characterisation Study.	No
Finchley Society	Para 6.3.5	Wording should be changed to indicate that this has happened and is happening. Following 6.3.5. there should be a paragraph here or elsewhere about the erosion of character by the proliferation of rubbish on the streets of Barnet, and what the Council is doing to combat it.	The Plan is explaining how character is eroded. It's not implying that this isn't happening in Barnet.	No
Theresa Villiers	Para 6.3.5 & 6.8.1	Agree and support these.	We welcome the support.	No
Finchley Society	Para 6.4.1	Detailed assessment of the impacts of development proposals will be based on a set of criteria that seek to ensure that the local character and existing context are reflected, . . .' There should be a commitment to produce this set of criteria by a stated date.	Such criteria will be set out in the forthcoming Sustainable Design Guidance SPD	Yes
Finchley Society	Para 6.4.4	This is too weak. It should say that developments need to aim for zero carbon.	Agreed. Text revised.	Yes
Former MHNF	Para 6.4.6	Re the 'Public Realm', It is our view that the standard of the Public Realm in Barnet is poor. The Council should develop a standards guide similar to that published by the City of London. (Supplementary Planning Document July 2016). This would improve the quality and appearance of the Public Realm, and would set a much higher standard for developers and the Council itself. We have copied below an extract from South Downs Local Plan (awarded for its environmental approach) on Sustainable Design that the Barnet Local Plan could do well to adopt.	Policy CDH03 reflects the Council's standard for public realm for new developments.	No

Finchley Society	Para 6.5.2	Second sentence is strongly supported. Visual interest must be created by active frontages. Large shopfronts must be open and not covered. There should be action against supermarkets with bland windows, and security shutters on shops that come down in the early evening and create a dead facade. Residential streets should observe the principles of overlooking with entrances, and windows, on the street frontage.	The Council welcomes this support. The Sustainable Design Guidance SPD will provide direction on these considerations.	No
Finchley Society	Para 6.8.1	Strengthen; reword the last sentence to: 'Development should not overshadow neighbouring buildings, block daylight, reduce sunlight or result in a loss of privacy and outlook.' Minimum distances for overlooking should be set, not less than at present (21m between facing habitable rooms). There should be standards for daylight and sunlight and developers should be required to show calculations.	Para 6.10.1 states "It is important to ensure that development does not significantly overshadow neighbouring buildings, block daylight, reduce sunlight, or result in a loss of privacy or outlook. Further guidance on standards affecting daylight, sunlight, privacy and outlook are set out within Barnet's suite of Supplementary Planning Documents". It is not always possible to maintain 21 m between facing habitable rooms but adequate daylight sunlight privacy and outlook for adjoining and potential occupiers and users should be provided. Policy CDH01 clearly states "Allow for adequate daylight, sunlight, privacy and outlook for adjoining and potential occupiers and users."	Yes
Elizabeth Silver	Para 6.8.1	This is very important where the height of a development exceeds the height of surrounding properties.	Noted	No
Finchley Society	Para 6.8.2	Information in the Sustainable Design and Construction SPD should be set out here.	The role of SPDs is to provide more detailed guidance for the implementation of Local Plan policy. There is no need for duplication.	No
Finchley Society	Para 6.8.3	This should be more balanced. Some desirable things are inherently noisy - small children, animals, pubs, transport, church bells, shopping streets. Quiet may mean lifeless. The Agent of Change principle is admirable and should be spelt out.	Agreed. Agent of Change principle is explained.	Yes
Finchley Society	Paras 6.13.1 & 6.13.2	Submitted Plans should clearly demonstrate compliance with the policy.	It is a requirement that developments meet Building Reg Part M4(2) and M4(3) standards as set out in policy CDH02.	No
Dr P. M. Ashbridge	Paras 6.16.7 & 6.21.1	Rightly emphasises that the borough's existing character and townscape is largely low-rise, and states that the height of a new building should correspond to the existing surroundings. Also very welcome is 6.21.1, which confirms that both designated and non-designated (Local List) heritage assets are "an irreplaceable resource" and that the presumption should be that a heritage asset should be conserved.	Support welcomed	No
Former MHNF	Paras 6.3.1 & 6.3.2	We have referred earlier to a need for standards to be set as per 4.2.2 above and the recent 'Living with Beauty' guide. This may provide a clear interpretation of the standard expected, rather than the subjective assessments that occur today. The Council's characterisation study, published in 2010 is out of date and needs to be brought up to date, perhaps in support of Policy CDH02.	Plan has been updated to reflect the BBBC work. There are no plans to revise the Characterisation Study.	No
Finchley Society	Paras 6.6.1 & 6.7.2	The space standards expressed are an absolute minimum. Expressing space in terms of m2 only does not necessarily lead to good design and useable flat plans meeting the requirements of a variety of household types over time. Lifetimes home standards should be reintroduced using as they do the spaces around furniture needed.	Space standards are a requirement and an important contributor to delivering good quality accommodation. It is accepted that they are not the only contributor. We note that there are no references to Lifetime Homes in the London Plan	No

Elizabeth Silver	Paras 6.9.1 & 6.11.5	The Pentavia Park proposal is inappropriate in massing, scale and height, overlooking surrounding 2-storey houses and their gardens.	The Pentavia Park proposal has been withdrawn by the applicant	No
TfL CD	Policy CDH01	Suggest that paragraph iii should also refer to Healthy Streets.	Agree	Yes
Environment Agency	Policy CDH01	Although part (b) makes reference to the Sustainable Design and Construction SPD, we think the policy could be improved by providing a more explicit reference to ensuring high-quality design for the natural environment. For example, the policy could state 'Apply the requirements of the Sustainable Design and Construction SPD to ensure the local environment, biodiversity, water management and sustainable drainage measures are incorporated.'	Revise CDH01b	Yes
Elizabeth Silver	Policy CDH01	In dense developments, very good sound insulation between flats is paramount. Hearing one's neighbours' conversations and their daily tasks, can really affect residents' mental health. For the same reasons, it is important that bedrooms and living rooms have some green space or trees to look out onto. Residential density should consider capacity of infrastructure.	Sound insulation is addressed through Building Regulations.	No
St William Homes LLP	Policy CDH01	The approach to deliver optimum density as set out in policy CDH01 'Promoting High Quality Design' is supported.	Support welcomed.	No
Marsfield (Avison Young)	Policy CDH01	We support the requirement for residential development to make the most efficient use of land by delivering optimum densities and that the consideration of densities should be design led. We note that this is reflective of policies on residential densities in the 'Intend to Publish' version of the London Plan, and is critical in providing sufficient housing to meet the Borough's identified needs.	The Council welcomes this support	No
Landowner at 360-366 Burnt Oak Broadway, (Avison Young)	Policy CDH01	We support the requirement for residential development to make the most efficient use of land by delivering optimum densities and that the consideration of densities should be design led. We note that this is reflective of policies on residential densities in the 'Intend to Publish' version of the London Plan, and is critical in providing sufficient housing to meet the Borough's identified needs.	The Council welcomes this support.	No
Fairview Estates	Policy CDH01	Fairview also consider that a number of the draft policies have also not been positively prepared and are unsound. CDH01 sets out a design-led approach will determine the capacity of a site rather any prescriptive density standards. We support the principle that the Council should seek to optimise sites and consider a range of design led elements when considering the capacity of a site. However, considerations of the local context and existing building form should only have a limited influences on the design of building and should never be the sole reason for reducing the size of a development. The emerging Local Plan should also recognise that areas should be allowed to evolve and development in order to meet local need and maximise the use sustainable infrastructure. New developments which move away from traditional/historic housing styles are necessary for this and to allow sites to be optimised. New developments can also provide a greater range of dwellings which meet local needs. The emerging plan should recognise that the design led approach will ensure that the maximum number of dwellings will be delivered on site in order to address the Boroughs housing need and growth will not be unnecessary limited because the proposed development do not accorded with existing typographies.	The Local Plan supports the requirement for residential development to make the most efficient use of land by delivering optimum densities and that the consideration of densities should be design led. High quality design solutions help to make new places that can make a positive contribution to existing suburban character.	No
Former MHNF	Policy CDH01	We have already commented on the real need for objective evaluation of "Good Design". We should not get buildings such as shown below built in a Conservation area, in Green Belt. This could be an office block or warehouse almost anywhere, rather than something of distinctive design that will look good for many years to come, and be easier to sell/rent!	The Plan has the policies in place to support high quality design solutions help to make new places that can make a positive contribution to existing suburban character.	No
Brent Cross South Partnership (DP9)	Policy CDH01	Paras 6.6 - 6.8 (Tables 9 and 10) set out specific guidance and details for housing standards. We note that the detail within these tables are dealt with in national and regional policy and query whether they need to be replicated here. Notwithstanding, clarity is sought on the source of the standards in Table 10.	Barnet's requirements set out in Table 10 are consistent with those in the London Plan (Policy D6 Housing quality and standards). Any changes to the	No

			standards set out in the London Plan or the SPGs will be applied to development in Barnet.	
Sport England	Policy CDH01 & 03	Should include reference to Active Design	Agreed	Yes
Geoffrey Silver	Policy CDH01 (b)	This is a good policy, but opposite Mill Hill East station it is ignored, as current developments there are completely out of character, even ugly, being much denser and higher than anywhere else in Mill Hill, including all other recent developments. (This example is reminiscent of the Pentavia Retail Park proposal which Barnet disapproved of).	Mill Hill East is widely considered as an example of good suburban growth supported by the Area Action Plan and Design Code	No
Finchley Society	Policy CDH01(a)	Despite the removal of the matrix from the draft London Plan 'optimum density' must have some criteria. Otherwise it provides an open door for developers, and refusals could not be defended on appeal. Over-density must be a valid ground for refusal of a planning application.	The new London Plan sets out a design-led approach to optimising site capacity, responding to factors such as site context and infrastructure. The Mayor's emerging Good Quality Homes SPD provides detailed guidance on site analysis and provides a range of residential types to test design capacity. The sites identified in the Sites Schedule will undergo a design-led approach to capacity at the masterplanning or application stage.	No
Finchley Society	Policy CDH01(b)	To be an adequate design code to meet the requirements of the London Plan the Residential Design Guide SPD and the Sustainable Design and Construction SPD must be fully up-to-date. They should be revised before the new Plan is adopted.	The Council will, prior to adoption, start producing a new Sustainable Design Guidance SPD to replace and update the content of the 2 SPDs.	Yes
Finchley Society	Policy CDH01(v i)	'adequate' should be defined; there should be standards for daylight and sunlight and developers must show their calculations.	Para 6.10.1 states "It is important to ensure that development does not significantly overshadow neighbouring buildings, block daylight, reduce sunlight, or result in a loss of privacy or outlook. Further guidance on standards affecting daylight, sunlight, privacy and outlook are set out within Barnet's suite of SPDs". It is not always possible to maintain 21 m between facing habitable rooms but adequate daylight sunlight privacy and outlook for adjoining and potential occupiers and users should be provided. Policy CDH01 states "Allow for adequate daylight, sunlight, privacy and outlook for adjoining and potential occupiers and users."	No
Ropemaker Properties (Barton Willmore)	Policy CDH01, TOW02 & ECC02	Policy and supporting text on agent of change is not aligned to London's Intend to Publish Plan. Definition in London Plan should be incorporated to address both future as well as current operation of sites (ie. as it may evolve with or without the need for planning permission).	Text revised to reflect London Plan when published	Yes
Barnet Society	Policy CDH02	The simplest way of reducing the very substantial environmental impact of new construction is to minimise demolition and new building. Instead, the Council should encourage retention and adaptation of existing buildings wherever practicable.	Agree – add reference in para 6.11.1 to the desirability of retention and adaptation of existing buildings wherever practicable.	Yes
Finchley Society	Policy CDH02	Uses the terms 'must', 'should (be)' and 'required' in different places. The terminology should be 'must', with any need for flexibility indicated where appropriate.	National policy sets the limits for planning terminology as part of a flexible and responsive planning system. As part of Reg 19 we have ensured a consistency check of the Plan	No

Barnet Society	Policy CDH02 & ECC01	This policy, Policy ECC01 (Mitigating Climate Change) and related draft Policies are well-intentioned but do not go far enough. For example, although there are statements about carbon reduction they refer entirely to emissions in use, there is no mention of the equally important need to reduce embodied carbon. Nor are many meaningful standards set with regard to energy, emissions or waste and the only reference to promoting a circular economy is a reference to Policy S17 in the London Plan.	Text amended	Yes
Finchley Society	Policy CDH02e	It should be recognised that compliance may sometimes be difficult, and there may sometimes be a conflict with e.g. environmental desiderata. The Design Statement should deal with these problems fully and openly.	This should be addressed by the Inclusive Design Statement	No
Finchley Society	Policy CDH02f & g	Compliance with these rules requires enforcement during construction. The Council must commit the necessary resources.	This is enforced through Building Regulations inspection visits	No
Environment Agency	Policy CDH03	Consistent with comments to GSS08, we think this policy should be further improved by including 'sustainable drainage systems' as one of the development features to be achieved. For example, part (a) could read as follows: Relate to the local and historic context and incorporate high quality design, landscaping, planting, street furniture and surfaces, including green infrastructure and sustainable drainage provision.	Agreed	Yes
Barnet Cycling Campaign	Policy CDH03	Support the use of Healthy Streets Indicators, but policy needs to set minimum acceptance criteria for healthy streets scores. Our assessments show that Barnet performs poorly compared to most of its neighbouring boroughs. It comes 28th out of 33 and could improve greatly by introducing Low Traffic Neighbourhoods, protected cycle tracks and widespread 20mph speed limits and CPZs.	Part b of the policy already states that proposals should be designed to meet Healthy Street Indicators, promote active travel and discourage car use.	No
Finchley Society	Policy CDH03	Say 'development proposals must.'	Planning needs to be flexible therefore 'should' remains our preferred term	No
Finchley Society	Policy CDH03c	'Meanwhile' occurs several times in the document; it is not generally understood, and there should be a reference to the Glossary.	Agreed. Definition added on Meanwhile uses	Yes
Environment Agency	Policy CDH04	A policy requirement should be included to reflect this, so that substantial green buffer zones are provided where tall buildings are located adjacent to rivers to protect and enhance the river corridor habitat. It should also specify that artificial lighting should be directed away from the river corridor to ensure wildlife are not adversely impacted.	Agreed – Text and CDH04 revised.	Yes
Landsec	Policy CDH04	The classification of tall buildings as being between eight and 14 storeys is overly restrictive. Eight storey buildings are not uncommon in a borough like Barnet and the GLA considers tall buildings to be of 30m or higher (approximately 10 storeys). Major thoroughfares should be considered as appropriate locations for very tall buildings (over 14 storeys), as well as tall buildings	Barnet's definition remains at 8 storeys or more and reflects the suburban character of the Borough.	No
Fairview Estates	Policy CDH04	Policy is basically unchanged from the adopted plans approach and sets out the specific areas where tall buildings will be considered appropriate. The policy does not provide flexibility for tall buildings to be permitted on appropriate sites outside these areas. There is no undated analysis of a Borough which has experienced change. This policy fails to provide sufficient flexibility to allow sites outside the areas listed to optimise their capacity through the use of tall buildings. Council has also recently granted permission for tall buildings on sites outside of these areas (19/4661/FUL Hyde Estate Road and H/01054/13 Hendon Waterside Development) which demonstrates that the current prescriptive approach is insufficient to meet the needs of the Borough. The policy is therefore not consistent with national policy by not allow sites to be optimised to provide their maximum number of units and can already be seen to be inappropriate for development from recent decisions.	CDH04 is a sensible and appropriate approach guiding the location of tall and very tall buildings in Barnet. The Council will not support any tall buildings outside of the locations identified in Policy CDH04.	No
Finchley Society	Policy CDH04	add at end 'and it is not reduced to less than the amenity space minimum in this Plan.'	Tall buildings are not exempt from delivering the standards set out in this Plan.	No
Ropemaker Properties	Policy CDH04	Policy should focus development at locations that are well connected by public transport and have good access to services and amenities such as Garrick Road Industrial Estate and is also conflicting by setting height ranges when CDH01 emphasises a design-led approach.	Garrick Industrial Centre is safeguarded as LSIS in the Local Plan. It is necessary to set parameters for tall buildings in the Local Plan	No

Brent Cross South Partnership (DP9)	Policy CDH04	Suggest removing maximum height level (28 storeys) and allowing for heights that respond positively to context (both existing and emerging) including local and strategic views.	Agreed	Yes
Mayor of London	Policy CDH04	The Mayor welcomes the inclusion of definitions for tall buildings and very tall buildings in its draft Local Plan and the identification of areas that are most suitable for tall buildings as well as very tall buildings. These correspond with the growth area policies. As some of the proposed locations may be linear along a high street, the policy should also ensure that development does not result in a canyon effect that can result in, or exacerbate poor air quality. It would be helpful if Map 4 showing local views also shows the areas that are most suitable for tall buildings so that the local views can be taken into account, especially where SPDs and masterplans are being produced.	Map 4 has been revised.	Yes
Historic England	Policy CDH04	there is some concern that important strategic issues such as the parameters for tall buildings will be set in an SPD, which does not form part of the development plan, and not in the local plan itself. In our view these parameters are integral to the strategic delivery of the plan and guidance should be included in the plan. Notwithstanding this, we welcome part iv in relation to heritage. We are also pleased to see that this policy makes reference to our guidance on tall buildings and the Borough's Characterisation Study.	Through SPD there is an opportunity for more detailed design work around parameters which supplements CDH04 as well as proposals in Annex 1. Sites in strategic locations where tall buildings may be appropriate have been identified. The Council welcomes this support.	Yes
Barratt London	Policy CDH04	Supports the general approach and locations identified, however concerned that the generic approach may not reflect the actual housing capacity at each site and planning permissions already obtained from the Council. It is recognised that tall buildings that exceed these heights will not be permitted unless exceptional circumstances can be demonstrated, such as appropriate siting within an Opportunity Area, however it is unclear why special circumstances are required. It may be more prudent to require very tall buildings to meet certain design criteria.	CDH04 has been revised. The onus is on the applicant to demonstrate exceptional circumstances sufficient to warrant a departure from the policy wording.	No
Federation of Residents Associations in Barnet (FORAB)	Policy CDH04	CDH04 is almost wholly concerned with the parameters for tall building within the areas where they are considered to be appropriate, whilst saying nothing about the rest of the Borough other than the implication that as a tall building is defined as 8 storeys or more, up to seven storeys will be the default for what is acceptable elsewhere. The London Plan says at 3.8.2 that "tall buildings are those that are substantially taller than their surroundings and cause a significant change to the skyline". This is a clear statement that could be used to protect low rise areas and something along these lines should be in the Local Plan tall buildings policy. Further, the London Plan offers flexibility to tailor what height is acceptable in specific locations, which indicates that the Barnet blanket definition of tall buildings as eight storeys or more applying across the Borough is far too rigid. We have large areas where there is little or nothing above 2/3 storeys and here five, six or seven storeys would clearly be considered a tall building. We suggest the default position should be that a building of five storeys or more would be considered as tall except in defined areas where variable higher limits could be set. We are also aware that in many localities developers have used the pressure to include more affordable housing as a reason to increase the height of buildings way beyond what was initially agreed. Such a situation is currently in discussion in relation to the New Barnet gas works site. We are alarmed that it has proved so easy for developers to press for much taller buildings in areas where they are at odds with the surroundings. So we ask for a statement in the policy that the maximum height allowed for particular areas may not be varied.	CDH04 revised to make clear that definition of a Tall Building and identification of strategic locations where tall buildings may be appropriate does not mean that all buildings up to 8 storeys or to a height of 26 metres are acceptable in these locations or elsewhere in the Borough. Such proposals will be assessed in the context of other planning policies, in particular Policy CDH01 – Promoting High Quality Design, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area	Yes
LB Brent	Policy CDH04	The Council is supportive in principle to the approach to tall buildings as set out in this policy in terms of their potential impact on Brent borough. A key element for it however is clarity on the boundary of opportunity areas. It is noted that there is a different approach to sites within opportunity areas and those outside in terms of maximum heights considered appropriate. Clarity on the boundary of opportunity areas along Edgware Road associated with this policy is needed. Whilst the draft London Plan contained opportunity area boundaries in one of its diagrams (Figure 2.8), it is for borough plans to define the extent of the boundary. The draft Local Plan consultation document does not provide clarity	Reg 19 provides clarification on boundaries of Growth and Opportunity Areas This will be reflected in our Statement of Common Ground	Yes

		on this matter. The key diagram for instance, although it is understood it is an indicative high-level plan, in relation to Colindale shows the opportunity area well away from Edgware Road, focussed on the major sites contributing to its housing target, such as the Public Health England site. Nevertheless, the site-specific proposals for McDonalds and for Burger King identify their location as within the Colindale opportunity/growth area. For Brent Cross/ Cricklewood Opportunity Area, the Barnet key diagram shows small parts of Edgware Road within the boundary, whilst the draft London Plan boundary contains all of Edgware Road between the north circular road and Cricklewood. Again clarity on this should be provided. The Council would appreciate early engagement on the proposed Buildings Heights supplementary planning document, in particular where it relates to areas where more detail is provided on sites that adjoin the borough boundary. Provide clarity on the boundary of the opportunity areas, particularly along the Edgware Road.		
Former MHNF	Policy CDH04	Tall Buildings policy must be enforced without fear of local decisions being overturned by The Mayor of London or The Secretary of State. Otherwise the public will lose faith in the planning system, and believe they are powerless to influence outcomes. This was not the desirable outcome of the Localism Act 2011, nor is it in tune with the fine words of successive Ministers since. Local means LOCAL not City Hall, and the Town Hall needs to listen to people who actually live locally to a development, and not give weight to the opinions of outsiders, who perhaps have a vested interest, but do not have to live with the consequences of bad decisions.	The Council is required to produce a Local Plan and make planning decisions within the parameters of the planning system as legislated by Government. Barnet's Local Plan must be in general conformity with the London Plan which legally forms part of Barnet's Development Plan.	No
TfL (CD)	Policy CDH04	Do not support the definition of 'tall' and 'very tall' buildings which do not accord with Draft NLP policy D9 (Tall Buildings) which states that the definition of a tall building should be based on specific localities and that the height ranges should vary by local context. It is unclear what might constitute 'exceptional circumstances' and a design-led approach would be more appropriate, in accordance with Draft NLP policy D9.	The Council refers to the Mayor's positive response on CDH04. The Council will not support any tall buildings outside of the locations identified in Policy CDH04. The Council is developing a Building Heights SPD to guide proposals and ensure building height is located appropriately	No
Former MHNF	Policy CDH04	The Tall Buildings policy is fine so long as it is properly adhered to.	The Council welcomes this support	No
Land owner 360-366 Burnt Oak Broadway, (Avison Young)	Policy CDH04	We welcome the support for tall buildings as appropriate along Major Thoroughfares (to include the Edgware Road/A5) and note that these policy objectives will facilitate compliance with other policy objectives of this Draft Plan, for example making the most efficient use of land and delivery of optimum densities.	The Council welcomes this support.	No
Client interested in North Finchley TC	Policy CDH04	Our client is supportive of Policy CDH04 which is in line with the adopted SPD and the requirements of national policy and the London Plan which seek to optimise density in town centre locations that are well served by public transport facilities.	The Council welcomes this support.	No
Harrison Varma Ltd (Savills)	Policy CDH04	The in-principle support for tall buildings (8 to 14 storeys) on the Major Thoroughfares is welcomed. This approach can support the optimisation of sites in these locations and especially in close proximity to transport nodes in order to intensify development. For consistency, Policy GSS11 should be altered to make clear that buildings taller than the existing neighbouring context can be acceptable; appropriate design can ensure that increased height can be achieved in the context of a lower existing context.	The Council welcomes this support. The emerging Building Heights SPD will enable the Council to provide clear design guidance for proposals for buildings.	Yes
Mary O'Connor	Policy CDH04	Tall buildings should be defined as above 6 floors and only permitted in Brent Cross	The definition of 8 storeys or more remains in place from the 2012 Local Plan as does the identification of strategic locations where tall buildings may be appropriate.	No
New Barnet Community Association	Policy CDH04	Tall buildings 5 storeys and above given the predominate 2/3 storey existing character and only accepted in designated growth areas	The definition of a tall building at 8 storeys or more was established by the 2012 Local Plan. The strategic locations highlighted in CDH04 are the places in Barnet where tall buildings may be appropriate.	No

Mr L. Barnor	Policy CDH04	My comments are that West Hendon is too built up now and does not have the transport infrastructure for more high rise developments. Also West Hendon is prone to flooding and especially on the junction of Goldsmith Ave and the Hyde going down to Sainsburys. There needs to be less high rise buildings and I suggest that they are limited to no more than 5 floors high and that there is adequate car parking provision.	The definition of a tall building at 8 storeys or more was established by the 2012 Local Plan. The strategic locations highlighted in CDH04 are the places in Barnet where tall buildings may be appropriate. The Council is committed to the delivery of sustainable and active travel and proactive in promoting travel behaviour modal shift and a reduction in car parking provision.	No
Mr Walker	Policy CDH04	Please register my objection to the plans as they stand. This is notwithstanding the positive arguments in favour. The main objection is the tower planned is far too tall and out of keeping with the neighbourhood. This is a residential suburb and not central London. The other main reason is that this does not have the consent of the majority of local people and therefore would not be a democratic decision.	The definition of a tall building at 8 storeys or more was established by the 2012 Local Plan. The strategic locations highlighted in CDH04 are the places in Barnet where tall buildings may be appropriate. As part of the planning process comments can be made on planning applications.	No
Friern Barnet and Whetstone Residents' Association	Policy CDH04	Policy CDH04 should be amended to make it clear that the statement at para 6.4.1 applies to the consideration of proposals for tall (and very tall) buildings- "The Council will not approve designs for new development that is inappropriate to the local character" Para 6.16.5 states that proposals for "Very Tall" buildings will not be supported outside Opportunity Areas. This needs firming up- "will not be permitted "would be better. The various references to "above ordnance datum" seem misconceived- surely the appropriate reference point is "above local ground level"? A "tall building" is defined as one of 8 or more storeys and CDH04 is intended to protect against inappropriate development of such structures. However, a building of less than 8 storeys may be inappropriate in many locations and we suggest that this needs covering in the express policies. We propose that Policy CDH01, which already recognises the relevance of height, should be firmed up along the lines of para 6.4.1 quoted above.	CDH04 has been 'firmed up'. Revisions include highlighting how proposals will be assessed. This includes character. AOD removed and cross-reference made to CDH01.	Yes
Barnet Society	Policy CDH04	Share FORAB's concerns about the application of this policy in predominantly low-rise neighbourhoods. In many parts of Chipping Barnet, blocks of 6-7 storeys would seriously intrude into views from nearby open spaces and the Green Belt. Green 'lungs' that separate neighbourhoods and give them identity are particularly vulnerable in this respect. Cases in point are TfL's proposed row of slabs lining Barnet Hill, blurring the distinction between the hill-top settlement and the low-rise suburbs of Underhill and Oakleigh, and Fairview's blocks looming over the tree-tops of Victoria Recreation Ground.	See response above to FORAB	Yes
Aberdeen Standard Investments (Lichfields)	Policy CDH04	Requiring "exceptional circumstances" to be demonstrated, in order to permit Very Tall buildings, is not in compliance with the emerging new London Plan which promotes a design-led approach. Reference to "exceptional circumstances" should be removed and that part (b) of the policy should be amended to include similar criteria as outlined under Policy D8 (Tall Buildings) of the draft New London Plan. In addition, both part (b) of the policy and Para 6.16.5 infer that the Edgware Growth Area is not a suitable location for Very Tall buildings, instead directing them to Opportunity Areas. This approach is not considered to be reflective of the highly accessible location, the site potential, and the context of the 17 storey Premier Place scheme. Request the following text amendments: CDH04 - " <i>Tall buildings that exceed these height limits ('Very Tall') will not be permitted unless exceptional circumstances can be demonstrated, such as appropriate siting within a <u>Growth Area</u> an Opportunity Area</i> " Para 6.16.5 – " <i>Buildings that are Very Tall (exceeding 14 storeys (46 metres or more AOD) will not be supported unless there are exceptional circumstances to justify their siting in <u>Growth Areas</u> Opportunity Areas which are areas of extensive change. Proposals for Very Tall buildings will not be supported outside of <u>Growth Areas</u> Opportunity Areas</i> ." The reference at para 6.16.7 that " <i>the principle of proportionality should apply, whereby the height of the building corresponds to the existing surroundings</i> " is considered	The Mayor is supportive of CDH04. Policy has been revised to be more consistent with London Plan Policy D9.	No

		to be over-simplistic and does not include sufficient flexibility to account for the individual circumstances of different sites.		
Barnet Society	Policy CDH04	A critical point not addressed in the Policy is the detrimental effect of tall buildings sprinkled across the borough. One of the pleasures of parts of Barnet is the illusion of countryside. The upper Dollis Valley is a good example, where only Barnet House and Angle House currently interrupt the green horizon. If additional towers are allowed to straggle randomly along the A1000, this effect would be destroyed. It would be better to designate locations where clusters of tall buildings would be permitted, with substantial distances between clusters.	Many of the strategic locations where tall buildings may be appropriate were identified in the 2012 Local Plan and it is recognised that tall buildings are now a more prominent feature in Barnet in 2021. CDH04 is a more detailed policy than in 2012. It references impact on views and the skyline.	Yes
Barratt London	Policy CDH04	The Draft Local Plan provides 'Alternative Options', including the proposition to 'Retain existing policies (DM05 & CS05)'. Strongly oppose any possibility of retaining the existing policies due to their approach to limiting tall buildings to simply eight storeys. Such height restriction to development stymies making the most efficient use of land.	The Local Plan approach to tall buildings is not inconsistent with that of the 2012 Local Plan and the definition of 8 storeys or more remains in place. The Plan is responding to more recent pressures for much taller buildings.	No
St William Homes LLP	Policy CDH04	To fully support the approach of location of tall buildings (Policy CDH04), district town centres should be added, whereby it can be demonstrated there is no detrimental impact; tall buildings should not just be restricted to the town centres of Finchley Central and North Finchley if the Council intend to deliver the most efficient use of land and adopt an optimum density approach to development.	The Reg 18 identified new strategic locations where tall buildings may be appropriate including the A5 and A1000 as well as the New Southgate Opportunity Area.	No
Redrow Homes (Avison Young)	Policy CDH04	Part c reference to maximum height of 28 storeys is not included in the evidence paper	This threshold has been removed	Yes
Barratt London	Policy CDH04	Concerned that an arbitrary maximum limit of 28 storeys (equivalent to approx 70 metres AOD) has been applied to tall buildings in this policy. This is not considered a sound approach and one based upon empirical evidence and should be deleted.	This threshold has been removed	Yes
Elizabeth Silver	Policy CDH04	The tower blocks built in the 1960s were unsuccessful social experiments. It is unclear how these new Tall Buildings/ tower blocks will be any better. In tall buildings the only way into a flat is via a lift or a very long flight of stairs. The very long flight of stairs in a tall building is an unsuitable route for most people. If there is a pandemic such as coronavirus, there is no way for people to enter or exit their flats in such a building, without encountering a contamination risk. So reducing risk for older people would mean true isolation and confinement, in itself a health risk. A much safer solution is to build no higher than four stories, with an external (metal) staircase to be used in case of fire or widespread infections."	Well designed and safe tall buildings have an important role to play in delivering new homes. The Local Plan will only consider tall buildings in specific locations.	No
Clive and Gill Hailey	Policy CDH04 and Para 6.16.1	Our family live in East Barnet - a delightful suburban area which is almost entirely consisting of one- or two-storey low-rise buildings, with a very few three-storey. There are just two blocks of flats in East Barnet Village. Therefore, the proposed definition of "Tall Buildings" is clearly not appropriate for this area. For those people living in a bungalow (of which there are many!) or in a typical suburban family house, a four-storey building would be described as and considered to be "Tall" and it would be overbearing and would overwhelm the existing character and amenity of the area. The Plan's definitions must reflect the specific aesthetics of each individual suburban area outside the designated strategic growth locations and must define "Suburban Tall" buildings as being four or more storeys. Buildings of more than three storeys must be refused unless within strategic growth areas.	Recent government changes to permitted development may allow existing buildings to add two additional storeys. The definition of a tall building at 8 storeys or more was established by the 2012 Local Plan. The strategic locations highlighted in CDH04 are the places in Barnet where tall buildings may be appropriate. East Barnet Village is not one of them.	No.
Finchley Society	Policy CDH04a	We disagree that the town centres of Finchley Central and North Finchley are suitable for tall buildings up to 14 storeys. These are areas of dense low-rise buildings in which tall buildings will be isolated eyesores. There is a growing collection of buildings in these locations in the 5 to 7 storeys range, and policy should be to limit new developments to a maximum of 8 storeys. Individual buildings up to 14 storeys would be incompatible with Policy GSS08, particularly 'a) achieve a high-quality design that enhances the visual amenity of the town centre.'	The 2012 Local Plan established both these town centres as strategic locations where tall buildings may be appropriate. Design safeguards are in place in the Local Plan to ensure that such proposals integrate with the urban fabric and enhance the visual amenity of the town centre.	No

Finchley Society	Policy CDH04a	We fully support this policy. No building of over 14 storeys should be permitted outside an Opportunity Area. This restriction should be absolute and strictly enforced so that there is no ambiguity for developers.	The Council welcomes this support.	No
Finchley Society	Policy CDH05	<p>Items d,e,f and g must be quantified. Why not adopt the standards for new development?</p> <p>d) Maintain an acceptable outlook and adequate spacing between any surrounding buildings. e) Retain satisfactory amenity space. f) Avoid adverse impacts on the sunlight/daylight to neighbouring properties. g) Maintain or improve the appearance of the locality or street scene.</p>	<p>As stated in para 6.19.3 Policy CDH05 applies to ALL extensions, commercial, public as well as residential uses. The Policy highlights that context and local character are key considerations in the design of extension development and there should be no significant adverse impact on the amenity of neighbouring properties.</p> <p>CDH05 on Extensions is relevant to existing developments and not new developments or new builds. In case of residential extensions Barnet's Residential Design Guidance SPD provides a clear and consistent message on how we manage change within Barnet's suburbs. The SPD focuses on improvements to the existing housing stock including extensions and provides more detailed residential design guidance on new developments and standards required.</p> <p>The council recognises that achieving design quality is an important part of good planning. Every development is generally different in size, context, type and nature but the underlying principle is that the development needs to be designed to ensure it functions well, is pleasing to the eye and it endures. The council will, therefore, not accept design that is considered inappropriate to its context or which fails to take opportunities to improve the character and quality of an area and the way it functions.</p>	Yes
Former MHNF	Policy CDH05	With regard to extensions, we are concerned about the conversion of garages into habitable space, where this then reduces parking space causing overspill on to the public highway. We understand that for many the garage is no longer for parking a car but is a much-needed storage area. Further, we do believe that where front gardens are used for parking, the paving must be permeable and at least a third of the garden area must be retained. If not, the street scene will be damaged for ever. Dropped kerbs provide access to owners' property but do not necessarily increase parking, as on street parking is reduced. As such, agreements to such changes should be made only when all consequences have been fully evaluated.	These are issues covered by permitted development, the remit of which is increasing as the Government wants greater relaxation of planning rules in order to enable delivery of more homes.	No
Friern Barnet and Whetstone Residents' Association	Policy CDH06	Policy CDH06, Basements is welcomed, but c) should be extended to expressly require that there is no demonstrable adverse effect on neighbouring properties, not merely on groundwater conditions.	Existing design guidance on basements will be updated in a new SPD on Sustainable Design Guidance. This will consider any new good practice on development (including basements).	No
William Taylor	Policy CDH06	Highlights the issues that can be caused by basement extension works including noise, traffic, disruption and in some cases structural damage to neighbouring buildings. Has suggested following the	Existing design guidance on basements will be updated in a new SPD on Sustainable Design	No

		approach taken by other councils to provide a Planning Advice Note (eg as Richmond have done - 'Good Practice Guide on Basement Developments') that can be referenced in the Plan.	Guidance. This will consider any new good practice on development (including basements).	
Thames Water Utilities (Savills)	Policy CDH06	Supportive of the policy, but request that it is strengthened by requiring all basement development to incorporate a positive pumped device or other suitable flood prevention device to avoid the risk of sewage backflows which can cause sewer flooding. This would ensure compliance with NPPF and good practice as recognised in Part H of Building regs.	We welcome support. The emerging Sustainable Design Guidance SPD is the best platform for setting out such technical requirements	Yes
Mayor of London	Policy CDH06	The Mayor welcomes Barnet's proposed policy on basement development in order to protect residential amenity and the local environment.	We welcome the support	No
Former MHNF	Policy CDH07	Amenity space is so important for all, but particularly families with children when health and wellbeing is considered a priority. Developers show glamorous CGI pictures of their plans for amenity space and landscaping but this is rarely delivered, particularly where small trees are planted and are poorly maintained. The London Plan guidelines should never be compromised but positive encouragement should be given to developers to exceed these minimum standards.	Agreed.	Yes
Mary O'Connor	Policy CDH07	Part a) <u>must</u> provide (not should) and no allowance for off-site provision (iii).	National policy sets the limits for planning terminology as part of a flexible and responsive planning system	No
Marsfield (Avison Young)	Policy CDH07	SOPH is restricted to older persons, and so will not accommodate children therefore there is no need (in planning terms) to provide children's playspace. Policy CDH07 should be amended to remove this requirement for SOPH proposals.	Requirements can be applied flexibly if there is no need in planning terms.	No
Environment Agency	Policy CDH07	Although we support the policy criteria for provision of new and existing wildlife habitat including tree and shrub planting to enhance biodiversity, we recommend this is reviewed in light of the imminent introduction of Biodiversity Net Gain. Biodiversity Net Gain will be mandated through the Environment Bill when it is enacted, likely to be 2022. This will require developers to achieve at least a 10% biodiversity net gain as a result of development proposals, either within a site or off-site.	Agreed. Policy and text revised	Yes
Barratt London (QUOD)	Policy CDH07	Support the approach to amenity space standards as set out in Local Plan Table 11, as this is in conformity with the London Plan.	Support welcomed.	No
St William Homes LLP	Policy CDH07	The Council's intended approach to amenity and landscaping (Policy CDH07) is fully supported as it follows the principles of St William's landscape led approach and vision for all sites to deliver a net gain in biodiversity.	Support welcomed.	No
Finchley Society	Policy CDH07	Add a paragraph d reading 'The Council will act to stop all front gardens from being destroyed by refusing dropped kerbs for all domestic use and making an Article 4 Direction.'	The Council has no plans to introduce a boroughwide Article 4 Direction.	No
Barnet Society	Policy CDH07 & Paras 6.20.1-6	Would like to see an explicit commitment to the value (visual and environmental) of retaining front gardens in suburban residential streets.	Agreed	Yes
Finchley Society	Policy CDH07(a iii)	Add 'mere contributions to the maintenance of existing parks will not satisfy this policy.'	Contributions to improvements to existing and nearby open spaces are still merited as off-site provision	No
Finchley Society	Policy CDH07(b ii)	Begin this 'Hardstandings are not a generally satisfactory alternative to front gardens; where they are inevitable they should contribute positively .	Text revised to make explicit reference to value of retaining front gardens.	Yes
Historic England	Policy CDH08	We also recommend that this policy makes specific reference to heritage at Risk. There are several assets in Barnet that are on the national Heritage at Risk Register	Agreed	Yes
Historic England	Policy CDH08	"Archaeological Interest" First line should be changed as follows: "Scheduled monuments and other undesignated assets which are demonstrably of national archaeological importance..."	Agree	Yes

HADAS	Policy CDH08	Add new sentence to end of first paragraph: <i>The Council will produce a Heritage Strategy to promote the range of heritage, historic, cultural and archaeological assets across the borough attracting tourists and visitors to such attractions.</i>	Although the Local Plan cannot state a commitment to producing such a document the Council will consider the merits of developing a Heritage Strategy.	No
HADAS	Policy CDH08	Archaeological Interest. This should be reworded to align better with 6.21.5, and should include a reference to GLAAS	Agreed	Yes
Historic England	Policy CDH08	Also, there may be sensitivity to development/tall buildings within their settings, e.g. the Golders Green Crematorium list entry <i>mentions “extensive views to the south”</i> and <i>East Finchley Cemetery list entry mentions “good views from the higher ground in the northern part of the cemetery over the southern part and beyond to the churches in Hampstead Garden Suburb”</i> . It would be helpful if this policy included more detail in this respect.	Policy CDH04 on Tall Buildings makes reference to Historic England guidance on tall buildings	Yes
Former MHNF	Policy CDH08	We should be developing properties that will be Barnet’s ‘heritage assets’ in the future. Little of what we see being built recently and in planning, respects its context and distinctive local character. Policy CDH08 is really important in ensuring that harm to currently designated heritage assets is not allowed and that new developments create places of high-quality design and contribute to the positive character of the area. Where buildings are demolished the reuse of building materials should be fully supported.	History will reflect on the value of contemporary design. The SPD on Sustainable Design and Construction encourages re-use of building materials	No
Historic England	Policy CDH08	This policy makes no reference to Registered Parks and Gardens, we recommend that the policy is expanded upon to provide guidance on how these important, designated assets and their settings will be conserved. Barnet benefits from four RPAGs: <ul style="list-style-type: none"> • Golders Green Crematorium (grade I; NHLE: 1001575 – private ownership); • East Finchley Cemetery (grade II*; NHLE: 1000835 – mostly owned by Westminster CC but with crematorium in private ownership); • St Pancras and Islington Cemetery (grade II*; NHLE: 1001688 – in public ownership by LB Camden and LB Islington); and • Avenue House Grounds (grade II; NHLE: 1001430 – in public ownership by LB Barnet). Given that three of these RPAGs are cemeteries/memorial landscapes, there may be common issues such as the condition of memorials, condition and use of buildings, divided ownership/differential management, vegetation management, etc.	Agreed	Yes
Historic England	Policy CDH08	It is not necessary to replicate the provisions of the NPPF in a local plan policy and the wording at present does not quite reflect the NPPF accurately (see comments on paragraph 6.21.2 below). We recommend that these elements are removed and replaced with more detailed, locally specific criteria. Parts b) i-v are helpful and should be retained.	Agreed. Policy and supporting text revised	Yes
HADAS	Policy CDH08 (b)	iv Reword for clarity: <i>‘Be accompanied by a Heritage Impact Assessment with clear and convincing justification for any harm to a designated heritage asset’</i>	Policy revised and sets out how impact on designated heritage assets will be considered	No
HADAS	Policy CDH08 (b)	Policy CHD08 (b) v This provision is strongly supported.	The Council welcomes this support.	No
Chris Thomas (British Sign and Graphics Association)	Policy CDH09	We are content that draft Policy CDH09 and most of the supporting text conforms to Government policy and practice advice	Support noted.	No
Wade Miller-Knight	Policy CDH09	CDH09 was commended.	The Council welcomes this support.	No
Finchley Society	Table 11	Third line. There should be an indication of what ‘normally’ means. It will otherwise be hard to justify a refusal.	Agreed. Table revised.	Yes

Historic England	Table 12	Barnet's archaeological priority areas (APAs) are out of date which means that they are not compliant with the London Plan. Unfortunately the APAs are not due to be reviewed until 2023/2024. We therefore recommend that Barnet discuss options the Greater London Archaeological Advisory Service (GLAAS) to update the APAs.	Subject to planning reforms as proposed in the Planning White Paper the Council expects to conduct an immediate review of this Local Plan. This will enable consideration of new evidence on APAs produced in 2023/24	No
Finchley Society	Chapter 7	There should be recognition of the significance of the provision of appropriate car-parking facilities for the success of a town centre. Car-parking is dealt with in Chapters 4 and 11, but does not get any mention in Chapter 7. There must at the very least be adequate cross-references.	Agreed. Cross reference to Policy TRC03 added at para 7.7.6	Yes
Finchley Society	Chapter 7	This chapter should mention the importance of basic street cleaning and the removal of litter if Barnet's town centres are to become places which people want to visit and linger in, thus bringing business to shops.	Agreed. Text revised. Town centres should be clean and attractive if they are going to generate footfall.	Yes
Federation of Residents Associations in Barnet (FORAB)	Chapter 7	Town Centres - The current Local Plan anticipated a significant increase in comparison retail space A1 at Brent Cross and a modest increase elsewhere, much of it expected by 2021. Although none of this space has materialised the draft Plan surprisingly largely repeats this expectation. Given the difficulties experienced by retailers over the years since the current plan was adopted in 2012, we suggest it is unrealistic to expect to defend all the existing A1 space, as the Plan aims to do, let alone maintain the expectation of expansion. We would instead wish to see encouragement to convert space in secondary retail areas to residential or other uses.	As highlighted above the A1 use class no longer exists so there is no remit for the Local Plan to safeguard former A1 retail space.	Yes
Brent Cross South Partnership (DP9)	Chapter 7	The proposed and emerging Metropolitan Town Centre at Brent Cross sits both north and south of A406 as identified in the 2014 outline planning permission for Brent Cross Cricklewood and the Development Framework: this should be reflected in the Draft Local Plan.	Agreed. This is reflected in GSS02	Yes
LB Enfield	Chapter 7	The redevelopment of the town centres is another significant cross-boundary matter that will need to be collectively reviewed through our respective emerging Local Plans. The major regeneration of Brent Cross looks to become a new Metropolitan Town Centre providing a range of uses, including new homes, commercial space, an expanded retail offer, destination leisure and entertainment, cultural and arts facilities, restaurants, hotels as well as open space. We would like to have a greater understanding of the future strategy for Brent Cross. It is assumed that an updated retail study will be commissioned which looks at the wider catchment area from which Brent Cross draws its trade as a major regional shopping centre as well as the changing trends affecting the retail sector as the current retail evidence base dates back to 2017 and has been superseded by a series of economic trends and updated Government guidance. On this basis, we would like the opportunity to review and discuss respective emerging supporting technical evidence, assumptions on retail and leisure floorspace and related impact on in terms of the levels of vitality and viability. Enfield supports the policy in relation to affordable workspace, where this is secured in the most appropriate locations. Draft Policy ECY01 indicates that this will be directed to town centres across Barnet. Enfield would welcome the opportunity to further discuss the emerging evidence, opportunities to secure affordable workspace and share from your experience product, especially within nearby town centres. This would assist in ensuring that the right product is secured in the right location, without prejudicing other likely locations.	Revisions have been made to the section on Brent Cross. This will be reflected in our Statement of Common Ground	No
Former MHNF	Chapter 7	Lack of parking is always used as the key reason for not visiting a Town Centre and undoubtedly there is some truth in this, particularly when you acknowledge (2.6.4) that 70% of residents live in a household with a motor vehicle. The transition for many, from car journeys is a very long way off, particularly when there are too few viable and effective alternatives.	The Local Plan in its response to COVID19 reflects the interaction between town centres and surrounding residential areas. Reducing car journeys remains a priority for the Local Plan	No
Former MHNF	Chapter 7	Barnet's Town Centres are certainly not 'thriving' today. We see 'thriving' as a real aspiration to be achieved at an early stage in the lifetime of this plan. Because of complex land ownership issues, schemes that involve compulsory purchase may well be required, in order to transition centres from what they are today, where some of the retail stock is not fit for purpose for use by today's retailers/restaurateurs. The Council needs to be pro-active in facilitating change to arrest further decline	The Plan recognises the changing nature of retail and encourages an appropriate mix of uses.	No

		and to build the wide range of shops and services that will attract more people to shop locally. Barnet is a collection of villages and as such these centres have been what has attracted people to the area. However, many are tired and lack the offerings to grow the footfall vital to their long-term existence. For many, a vibrant night-time economy would be a huge advantage, 'sweating the assets' in real estate and encouraging community cohesion. A hotel, 2 screen cinema, and town centre gastro pub/wine bar would make a positive change in Mill Hill Broadway, attracting locals and those living nearby to spend their disposable income locally, rather than travelling to other areas.		
Former MHNF	Chapter 7	We see necessary regeneration of the Town Centre in Mill Hill to include new buildings of a size more suited to modern retailing. There could perhaps be a reduction in the total number of outlets because of decreased footprint. Several sites could then be used for mixed development, such as offices, community use, leisure etc.	This could be a consequence of the changes to the Use Classes Order with the introduction of Use Class E for commercial uses. This provide greater flexibility for landowners to respond within town centres.	No
Former MHNF	Chapter 7	Most people in Barnet do not associate themselves with Barnet per se (which of course is not to be confused with of our Town Centre) They live in and identify with Totteridge, Mill Hill, Edgware West Hendon etc. They rarely travel from Mill Hill to shop in Chipping Barnet for example. If Mill Hill doesn't have it, then Brent Cross probably will, unless they're looking for DIY goods in which case a trip to Borehamwood will be necessary! People's future spending patterns must be fully assessed before any commitment is made to develop more retail space, even though we might think it would be desirable to have a big new shiny Regional Centre, we certainly do not need a white elephant.	We acknowledge the impact of online shopping and COVID19 on the traditional retail format. The September 2020 changes to the Use Classes Order with the introduction of Use Class E for commercial uses as a replacement for A1 retail reduces the remit of the Plan to set targets for new retail provision. The Council still has plans for Brent Cross to be a regional destination	Yes
Finchley Society	Chapter 7	This chapter should include a paragraph about the need for pavements to be uncluttered so that people, especially but not only the less mobile, can easily pass and repass. Shops which put goods for sale outside; advertisement hoardings; and erections masquerading as telephone kiosks; all need control. There is a risk that in the future charging points for electric vehicles may add themselves to this list.	Agree. Text revised	Yes
Former MHNF	Chapter 7	We suggest that we should be looking to reduce the number of charity shops (now six in the Broadway), and also to reduce Payday loan and betting establishments, through careful licencing. Additionally, shops that sell goods from stalls at the front of their shops should be restricted and should offer only goods that are attractive within the street scene. e.g fruit and veg. or flowers, but not toilet rolls.	With the changes to the Use Classes Order the Local Plan can no longer pursue this requirement	No
Finchley Society	Section 7.7 to 7.9	Nowhere is there mention of coffee shops (with brands like Costa, Starbucks and Café Nero as well as many independents). These have become a vital part of town centres, and an important local amenity. Most of them are not open in the evenings. Finchley has a large number; they serve as locations for socialising and remote working as well as for consuming food and drink. Their policy of providing a 'third space' (neither private home nor public) helps many people to deal with overcrowded and cramped living space. They should be included in the analysis of town centres, and their number and quality should be monitored. They should not be adversely affected by rules on hot food takeaways, even though they may provide some light hot food as a sideline to coffee.	The profusion of coffee shops in town centres reflects their popularity. Such provision is best left to market forces.	No
Finchley Society	Section 7.3	There should be a para or paras in this section about the need to appeal to local people and visitors to come and linger, rather than just using the town centre for quick grocery shopping, by promoting late opening hours of non-food retail stores (which currently shut at 5.30/6.00 p.m.); promoting local history and heritage with e.g. informative signs and guided walks; attractive murals on end walls; better signage to local attractions; greening - trees/flower beds; actively but sympathetically discouraging begging and rough sleeping; dealing with routine town centre problems rapidly to improve the feeling of security, perhaps through a town centre manager; and better management of road works	Agreed, this is reflected in the Local Plan helping to make more efficient use of Barnet's town centres and encourage longer visits.	Yes
Former MHNF	Section 7.5	We challenge the need for extra retail space at Brent Cross based on current retail market trends. In the USA many shopping malls are contracting with say, one of several wings being converted to offices or residential. The passion for retail therapy has significantly reduced and the internet will continue to	The Reg 19 recognises the critical importance of BXC to the Borough and the wider sub-region. Given the continued economic uncertainty a sufficiently flexible	No

		deplete the market share of bricks and mortar retailers. There needs to be a detailed analysis of buying patterns based on recent volumes of 'shopping trips and transaction values' in order to predict the future accurately. Further, with the pressure to reduce carbon footprint and journeys by car, there needs to be a better understanding of what Barnet residents will expect in the following areas in future: 1) Buy on-line for delivery at home or another drop-off point 2) Buy locally (within 1-2 miles) where required items are readily available/can be carried home 3) Travel up to 5 miles (perhaps to Borehamwood) for specific items not available locally. 4) For items where more choice is needed – travel up 5 miles (could be Brent Cross or Wembley for example) 5) Or for even wider choice/greater experience, travel into Central London to Oxford Street or Westfield. 6) Visiting another centre as an alternative shopping experience, maybe just window shopping.	planning policy context is required to ensure that a successful and sustainable scheme can be delivered.	
Brent Cross South Partnership	Section 7.5 and TOW01	This section and policy should be clear that the outline planning permission for BXC is for comprehensive regeneration of the area to create a new mixed-use town centre both north and south of the A406 (High Street North and High Street South). The new Metropolitan town centre should be identified on the proposals map.	Agreed. This is reflected in the supporting text. Brent Cross is shown on the Policies Map as a Growth Area.	Yes
Former MHNF	Para 7.3.1	We acknowledge support from the Council to get the bins off the street in our Town Centre and to replace the process of waste disposal with regular time banded bag collections. This has for the most part worked well and is much appreciated by users of the high street.	Support welcomed.	No
Elizabeth Silver	Para 7.3.5	Healthcare facilities should not rely on CIL and S106 contributions; Developers can claim exemption on grounds of viability. Healthcare provision needs to be put in first, like water and sewage supplies, not when the last resident has moved into the development.	The funding of the NHS is beyond the remit of the planning system. Through working with North Central London CCG both CIL and S106 can be utilised to support the timely delivery of new health facilities.	No
Finchley Society	Para 7.4.1	Fourth bullet point. Payday Loan shops may be yesterday's problem; have they not almost vanished? Betting shops may be on the decline, too. Fifth bullet point. Dry-cleaning establishments, and perhaps also laundrettes, which have an important function, should be mentioned. It is surprising that no mention is made of charity shops. These have filled the rising vacancies created by the decline in commercial retail premises. Such shops serve useful functions, but are also a burden on the Council in terms of rates, and there should be a clear policy as to their number and standard. Too many charity shops, like empty premises, can give the impression of a struggling Town Centre, without quality retailing, and hence actually deter people from visiting and lingering.	Such uses remain a problem as long as they are attracted to town centre locations. The Plan can provide no added protection for laundrettes and dry cleaners. Charity shops are now playing an increasingly important role in the town centre offer. Attitudes are changing towards them.	No
Finchley Society	Para 7.4.2	Second bullet point. The TCFNA is already three years old, and dated in various respects. These figures must be revisited. It is hard to believe that additional comparison floorspace will be needed in Barnet given the decline in the retail sector.	Following the radical overhaul of the Use Classes Order the Council will not be refreshing the TCFNA.	Yes
Brent Cross South Partnership (DP9)	Para 7.4.2	Clarity is needed as to whether the 77,000m2 referenced includes the retail floorspace consented within the BXC planning permission.	This is additional capacity. Further clarification of this added	Yes
Former MHNF	Para 7.4.3	With regards to 7.4.3 We believe that small cinemas (2 screens) are needed in Town Centres to increase leisure facilities and boost footfall for the benefit of all and to restrict local journeys. We recall that Mill Hill used to have two cinemas in the High Street. The majority of our residents will return home after work and often go out to the cinema, probably with family/friends and so a car is most likely to be used for such journeys, unless it is local. It is not desirable to have a multi-screen cinema at only one location within the borough and certainly not one that relies heavily on travel by car. We suggest that the proposed expansion of Brent Cross has not been well thought through as it comes without the basic transport infrastructure to make it attractive to travel there by public transport.	Brent Cross is a sub-regional destination attracting people for leisure and retail activities. The Plan as part of COVID19 recovery wants town centres to be thriving and when confidence returns the Council hopes that there will be commercial investment in leisure within town centres.	No
Finchley Society	Para 7.4.3	Fifth bullet point. This should be revisited in the light of the woes of the Phoenix in East Finchley. The Arts Depot however deserves mention, as do other live theatre and music venues.	While there is uncertainty in all these sectors following COVID19 there are no merits in making reference to specific cultural facilities.	No

TfL	Para 7.7.6	We strongly support that development in town centres will be expected to enhance the public realm, and that reducing car travel will be encouraged. To facilitate this, we urge the Council to consider opportunities to reduce on-street and off-street car parking as part of town centre development. Reductions in the dominance of vehicles has been shown to support town centre vitality by making the public realm more pleasant and inclusive.	Improvements to the public realm are essential in getting people back in Barnet's town centres. The Council supports the Healthy Streets approach to reduce car dominance and improve street safety.	No
Former MHNF	Paras 7.7.2 & 7.7.4	We also agree 7.7.2 that digital technologies can help drive footfall. We note your offer of support here but it is not clear how this will manifest itself. We would be interested to see how you envisage this being brought into play and by whom? We note that you acknowledge 'Markets are a key generator of Footfall'.	The Council as an organisation will respond to innovative ideas that contribute to thriving town centres.	No
Spires Barnet (Williams and Gallagher)	Policy TOW01	Support overarching objective. Suggest amendment to text ...viability of these centres by the approval of edge-of-centre <u>and out of centre</u> development. In addition, any proposal of more than 500 sqm <u>for</u> retail, office or leisure development <u>in an edge or out of centre location</u> must be supported by an impact assessment.	Agreed	Yes
Barnet Cycling Campaign	Policy TOW01	Policy fails to recognise that town centres are unattractive because they are dominated by polluting, noisy and dangerous traffic. In towns where traffic has been restricted footfall and trade has increased.	Agreed – policy revised	Yes
Brent Cross Dev Partners	Policy TOW01	TOW01 states that Brent Cross through GSS02 is to provide a strong retail offer as well as a wider mix of uses including leisure, office and other commercial, community and cultural uses to create a regional destination centre for North London. The reference to “regional destination” should be replaced with “Metropolitan Town Centre” for clarity and residential uses should be included within the draft policy text.	Agreed	Yes
Finchley Society	Policy TOW01	TOW01c Add 'The Council will set up and seriously support town teams, town centre managers and the like.' TOW01d. This should be given some content. What sort of shops will be encouraged? Often shops which seek a cheap base, without any particularly local function, locate in parades; a single multi-purpose shop may meet most if not all really local needs, and because of that be viable. TOW01f. The last but one sentence focusses on edge of centre developments; but ones completely out of the centre may be more deleterious.	Our wording is more appropriate Following changes to the Use Classes Order TOW01 has been revised.	Yes
New Barnet Community Association	Policy TOW01	110,000 sqm new retail space seems unrealistic and may have negative impact on TCs.	The September 2020 changes to the Use Classes Order with the introduction of Use Class E for commercial uses as a replacement for A1 retail reduces the remit of the Plan to set targets for new retail provision.	Yes
Landsec (Indigo)	Policy TOW01	This policy would require the re-provision of restaurant and leisure floorspace at the GNLP to go through the sequential and impact tests. The policy and supporting text should be amended to reflect that established locations should not be required to do this if there is no net gain in restaurant and leisure floorspace.	This is consistent with the NPPF. Application of the sequential test should be applied to ascertain whether a town centre site could be used. The September 2020 changes to the Use Classes Order with the introduction of Use Class E for commercial uses as a replacement for A1 retail reduces the remit of the Plan to set targets for new retail provision.	yes
Redrow Homes	Policy TOW01	Support	Welcome the support	No
Mayor of London	Policy TOW01	The Mayor welcomes Barnet's proactive approach to the management of its town centres through various frameworks, strategies and SPDs and the overall planning policy approach set out in the draft Local Plan. It is noted that the District Centre of Finchley Central is called Church End in Annex 1 of the Intend to Publish London Plan. It is unclear how the borough will control the type of Class A1 floorspace delivered in line with proposed Local Plan Policy TOW01.	With the changes to the Use Classes Order the Local Plan can no longer pursue this requirement. Plan revised to clarify Church End Town Centre know known as Finchley Central	No

Mayor of London	Policy TOW02	Smaller scale mixed use resident development should also be promoted in Barnet's Local Centres, in line with draft Local Plan Policy TOW02(e) which strongly encourage residential use on upper floors in town centres. The Mayor welcomes the reference to the Agent of Change principle in order to protect residential amenity from new development, however, the principle should also be applied in the main policy to protect existing businesses from residential development introduced nearby, and not just in the supporting text at proposed paragraph 7.9.3.	Policy revised with greater emphasis on Agent of Change	Yes
Former MHNF	Policy TOW02	We think the reduction to 65% A1 space is welcome. We are not sure whether it will be enough notably as we drive up the night-time economy. Flexibility is undoubtedly necessary. Equally, some planning guidance will be necessary to stop a High Street being made up solely of nail bars, hairdressers and charity shops. In Mill Hill four major banks (shortly a fifth) have left our High Street, and this has undoubtedly reduced footfall in the street. Without many office workers seeking lunch and buying products to take home, the High Streets are suffering.	The Plan will be revised to reflect the changes to the Use Classes Order and the introduction of Use Class E Commercial Business and Service uses. The A1 use class no longer exists and there is greater flexibility for a former A1 use to convert to another use within the new E use class and contribute to town centre vitality and viability.	Yes
Redrow Homes	Policy TOW02	Part g) should reflect para 109 of NPPF and require that proposals are refused if they result in a 'severe' impact on highway safety and/or the road network.	The policy is considered to comply with the NPPF.	No
Spires Barnet (Williams and Gallagher)	Policy TOW02	Object to part a) and c) as in conflict with providing a mix of uses in TCs. Vacancy for 12 months will create vacancy for a long period and then permission for change of use will take more time. Need more flexible approach that should include key test for impact on vitality and viability.	TOWO2 has been rewritten following the replacement of A1 by the new commercial E use class. The A1 use class no longer exists and there is greater flexibility for a former A1 use to convert to another use within the new E use class and contribute to town centre vitality and viability.	Yes
Client interested in North Finchley TC (Quod)	Policy TOW02	In our view the A1 retail retention figure within Policy TOW02 is too restrictive and not appropriate given the ongoing changes within the retail sector. The UK retail market has been experiencing significant structural changes with the closure and consolidation of major national stores and brands. Published evidence, including from the GLA, shows that it is the middle tier centres (Major and District Town Centres) that are most at risk. Those centres at the top of the hierarchy are forecast to continue to be the main locations for comparison goods shopping, with smaller centres fulfilling a convenience and top up function – Major and District Centres fill the middle ground that are likely to be most exposed to the structural changes as the retail sector consolidates. As a result and given the continued economic uncertainty, a more flexible policy framework is required to ensure that successful and sustainable town centres can be maintained. Policy TOW02 as currently drafted has the potential to undermine the vitality and viability of town centres, limiting the delivery of other main town centre uses such as residential, office and leisure. This is not in accordance with the New London Plan which seeks to promote town centres as “strong, resilient, accessible, and inclusive and viable hubs for with a diverse range of uses” (Draft Policy SD6). As such, we would request that the percentage retention figure is removed from the policy wording.	TOWO2 has been rewritten following the replacement of A1 by the new commercial E use class	Yes
Sport England	Policy TOW02	Support this policy allowing community facilities, which would allow sport and recreation facilities.	We welcome the support.	No
Former MHNF	Policy TOW03	We do believe that “Clusters of similar retailers” should be avoided, but how big is a ‘cluster’? In Mill Hill, planning was granted to turn an A2 ex bank into a pizza takeaway while three others existed within 75 metres. Further, the new incumbent has three other sites each within 2/3 miles of Mill Hill, and since most of his products are delivered by motor bike or collected by car, it is adding greatly to the carbon footprint. The market demand for pizza locally has not increased by a third to ensure the financial viability of the original three providers. Planning guidelines should include a true assessment of competitive value, not simply leave it to market forces. Planning seems to evaluate every other	Changes to the Use Classes Order in particular to A1 to A5 uses introduce greater flexibility between uses with the intention of helping business and letting market forces prevail. There is no locus for the planning system to get involved in details such as competitive value.	Yes

		parameter, and it should consider the impact on existing businesses and overall benefit to the vibrancy of the Town Centre.		
Spire Barnet	Policy TOW03	Should be emphasised that not all A5 uses will be detrimental to TC health (including healthy eating hot food takeaways). We would like to see reference to the Council's Healthier Catering Commitment.	TOW03 revised to reflect changes to the Planning Use Classes Order and the replacement of A5 uses. vii) refers to the Council's Healthier Catering Commitment and overall the Policy will not stop Hot Food Takeaway use, if deemed appropriate under the criteria based policy.	No
Mayor of London	Policy TOW03	The Mayor welcomes Barnet's approach to managing the clustering of certain uses in its town centres, especially hot food take-away Class A5 uses within 400m of the boundary of an existing school or youth centre, in line with Intend to Publish London Plan E9.	We welcome the support.	No
Mayor of London	Policy TOW04	The Mayor welcomes Barnet's positive approach to the night time economy and the broad definition that it includes all economic activity taking place between the hours of 6pm and 6am.	We welcome the support	No
Brent Cross South Partnership	Table 13	The outline planning permission for BXC states that the new town centre will be both north and south of the A406, and this should be noted in Table 13. We therefore suggest that the reference to "Brent Cross Shopping Centre" is changed to "Brent Cross" to reflect the position as established by the outline planning permission.	Agree	Yes
Finchley Society	Table 13	Table 13 should also list the out of town retail parks mentioned in 7.2.1.	Such places do not form part of the town centre hierarchy	No
Friern Barnet and Whetstone Residents' Association	Chapter 8	Whilst it is appreciated that provision of healthcare facilities and staff capacity, and of some other types of community infrastructure, is not a direct function of the Council as planning authority, nevertheless the Council is a "gatekeeper" for the approval of development proposals which either individually or cumulatively will impact significantly on the level of local demand for primary healthcare or other services and facilities. In order to protect the availability of such services and facilities (which are already under stress) for existing local residents as well as to ensure they are available for residents of new residential accommodation, a mechanism is required to ensure that large new residential developments are not brought into use unless and until an objective assessment demonstrates that the necessary services are available at an appropriate level in appropriate locations. We suggest appropriate additions in the Policies set out in Chapters 5 and 8.	Growth needs to be supported by infrastructure. The Infrastructure Delivery Plan (IDP) provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No
Middlesex University (Tibbalds Planning)	Chapter 8	<u>Provision for Children and Young People</u> The University is disappointed to find that there is no explicit reference to, or policy support for, higher and further education.	Section added on Further and Higher Education	Yes
Canal & River Trust	Chapter 8	Note that the Phoenix Canoe Club, or the potential for any other community watersports opportunities within LB Barnet, are not mentioned within the Local Plan. We support this local facility and the potential for enhanced use of the reservoir for community uses.	It is not feasible to make specific reference in the Local Plan to all community clubs and facilities that operate in Barnet.	No
Department of Education	Chapter 8	Particularly interested in responding to any update to the Infrastructure Delivery Plan/ Infrastructure Funding Statement, viability assessment or other evidence relevant to education which may be used to inform revisions to local planning policies or the CIL charging schedule. Request to be engaged with DfE and consult on any relevant future consultations. Council should set out education infrastructure requirements for the plan period. Where additional need for school places will be generated by housing growth, the statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used.	The IDP/ IFS has been published and the new CIL Charging Schedule has been subject to public consultation.	No
CCI London Community Church	Chapter 8	8.3.1 – Community Infrastructure – reduction in funding, increased levels and demand and rising expectation – what if the location is self-funded? If the facility is pre-existing and self funded?	The Local Plan can only address issues that come forward through the planning system. Ensuring that new community infrastructure is appropriately located	No

		<p>8.3.2 – What is the consideration for an already existing infrastructure and is accessible to the local community.</p> <p>Policy CHW01 – Community Infrastructure- who is considered a ‘partner’ with whom the council plan to work with regards to places of worship, especially already established places of worship? Apart from the opening paragraph, no provisions or steps are made clear as to how this will be implemented.</p>	<p>in accessible locations and supported in the long term is covered by Policy CHW01. This policy also sets out how the Council will consider any loss or replacement of an existing community facility.</p> <p>The Barnet Partnership Board is an advisory Committee which brings together key public, private and voluntary organisations such as North Central London CCG and Community Barnet to identify and articulate the needs and aspirations of local communities.</p>	
Elizabeth Silver	Chapter 8	<p>Para 8.2.3 With an increasing proportion of young and old population, healthcare provision will need to increase, not decrease as stated in 8.3.1. Para 8.2.4 Libraries are a great social leveller. The 14 libraries should be re-instated instead of their buildings being sold off (see notes to 8.3.5). Lack of library facilities hinders social mobility as lower income groups increasingly do not have space to store books, nor money to buy them, thus impacting on the next generation’s future earnings. Para 8.3.1. Decrease in funding for healthcare and community facilities is incompatible with an increase of 60,000 (15.3%) in population. This is unsustainable development, leading to a considerably lower standard of living. “efficient, flexible and adaptable” as applied to community facilities, may be unworkable for Health and Safety (hygiene) reasons. For example can a GP’s surgery double up as a library, or a library as a nursery? Para 8.3.2 If there is no parking at doctors’ surgeries, then it will be difficult for patients with mobility problems to be brought there in a friend’s car or even by taxi, and for doctors to work out of hours. Para 8.3.3 Only if there is any expansion space left. For example at Edgware Hospital, if all spare parking place is filled by housing, there is no room to expand. Para 8.3.5 Reconfiguration of the library estate has effectively meant a loss of space for books. This discriminates against people living in smaller properties with less storage space for books. Libraries with a good stock of books aid social mobility. A whole generation grows up only reading short extracts on the internet, with associated difficulties in comprehension skills. Para 8.9.1 and 8.9.2 Sale of Assets of Community Value (ACVs) is very worrying. Para 8.10 and 8.11 Statements conflicting with sale of ACVs such as sites 1,3,4,5 (part of),17,18,23,26,40, 41,45 and 48.Policy CHW01 – Community Infrastructure - If GP surgeries and library facilities are only located in town centres, this can make them less accessible to those with mobility problems. i. and j. Fewer care home spaces would need a much higher provision of in-home carers.</p>	<p>These are issues that have an impact on peoples lives and it is the role of the planning process to take these into account and apply Local Plan policies when more detailed proposals come forward.</p> <p>The Reg 19 Local Plan is supported by the Infrastructure Delivery Plan (IDP) which provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.</p>	No
Former MHNF	Chapter 8	<p>We also consider that GP practices locally are inadequate as they are overloaded with patients with an ever increasing and challenging set of health issues. Primary care locally is not meeting the demands coming from recent growth and is not apparently prepared for the further growth being planned. Getting a GP appointment is a very real challenge with wait times, currently at all practices, of 2-3 weeks other than for emergency cases. We do not see the necessary, tight integration of the NHS in Planning for future developments. It is interesting that Policy CHW01 does not include mention of Primary or Secondary Health Care which is a significant omission as the Council is responsible for improving the health of their local population and for public health services, albeit the NHS is the delivery vehicle, along with private providers.</p>	<p>We continue to work closely with North Central London CCG in the development of the Local Plan and the supporting Infrastructure Delivery Plan.</p>	No
Mayor of London	Chapter 8	<p>The Mayor welcomes the overall approach to delivering community infrastructure and health and well-being in Barnet. This is reflected in Barnet’s site allocations that seek the re-provision of community infrastructure where a site is to be developed.</p>	<p>We welcome the support</p>	No
Finchley Society	Section 8.13	<p>This section should be more realistic, and recognise that there is a lot of crime and disorder in Barnet, perceived by many as increasing, and that there is only a limited amount that Barnet Council can do about it, since policing is not within their control.</p>	<p>The Local Plan has an important contribution to make in terms of making the Borough a safer place, designing out crime and promoting safer streets.</p>	No

Finchley Society	Section 8.10	The Plan does not address Barnet's pavements. Maintaining the quality of pavements (repair, width, etc.) is important for: (a) safety of individuals as they walk, and (b) encouraging walk rather than driving, thus fostering better health. In many areas pavements are in poor repair (due to lack of maintenance, tree roots, etc.) or are too narrow. The Plan should clarify the Council's intentions and capital allocation for this vital element of local infrastructure. [This also pertains to Healthy Streets and Active Travel in Chapter 11].	Agreed that for pedestrians surfaces should be safe. See previous response to Finchley Society at Chapter 6 on Character, Design and Heritage	Yes
Barnet CCG	Section 8.10	Welcomes this section on promoting health and wellbeing recognising the role of planning to create healthy environments and influence many of the determinants of health.	Support welcomed.	No
Barnet CCG	Section 8.11	Reword title of section to read: Access to integrated health and care services	Agreed.	Yes
Barnet CCG	Section 8.11	Add para under 8.11.2 to read: "A key focus of the North Central London integrated health and care plan is to prevent ill health, which includes partnership working to tackle the wider determinants of health. An integrated care system will deliver services at different levels, including neighbourhood networks based around GP practices, 'Borough Partnerships' and as a North Central London 'Integrated Care System'."	Agreed.	Yes
Friends of Finchley Way Open Space	Section 8.12	Strongly support this element of the Plan.	This support is welcomed	No
Friends of Finchley Way Open Space	Section 8.14	I do not understand why public houses and their encouragement have been placed in the wellbeing chapter. This policy reflects a very old fashioned and somewhat sexist view of society. Pubs do not contribute to wellbeing. Alcohol is a major cause of both street violence and domestic violence. The area of North Finchley with several pubs is one of the crime hotspots of the borough. Public houses are no longer 'the heart of the community's social life'. This is especially true in an area with a sizable Jewish and Muslim population. The closure of pubs in recent years on a mass scale reflects changing social habits and the multicultural society Britain has become. Moreover, younger people drink less alcohol than older generations and the plan focuses on younger people. The protest at the closure of the Bohemia in North Finchley was 10 years or more ago when those now forming the younger generation were still children. Any visit to almost any pub that is not essentially a restaurant or does not have an event on will show that most pub goers are male. Barnet needs to consider the socio-demographic of those who respond to local plan consultations in revising this policy. A better strategy would be to enable coffee shops to stay open later.	The contribution of pubs to community well-being is recognised by public health as well as their designation as Assets of Community Value.. COVID19 has further highlighted their contribution as a destination away from home.	No
Chris Carabine	Section 8.3	There has already been very substantial residential development and population increase in Mill Hill ward and the infrastructure is not keeping up. There are no new supermarkets hence the existing one struggles to maintain stock, no new secondary schools, and roads are over-used and becoming very dilapidated and unsafe. Passengers at Mill Hill East TFL station are already experiencing difficulties boarding trains in rush hour periods and there will be many more residents to service on completion of the Millbrook Park etc developments at the Council Depot and Barracks sites.	Chapter 12 sets out how the Council intend to deliver infrastructure to support growth and development in Borough. It indicates that it will work with a range of public and private stakeholders. The Infrastructure Delivery Plan informs the Council's capital programme and its work in terms of supporting other agencies delivering infrastructure requirements, particularly through developer contributions.	No
Finchley Society	Section 8.4	There should be a recognition of the need for a closer correspondence between the educational curriculum and local employment opportunity, in order to achieve the aspirations of Chapter 9.	This is reflected in Chapter 2 on Challenges and Opportunities	Yes
Former MHNF	Section 8.4	There is a growing need for an additional secondary school in the Mill Hill area. With thousands of new flats and properties being erected in the area, there is a severe lack of secondary schools. There are a staggering 13 primary schools in the Mill Hill area. Some of these are faith schools and some of these are private/independent schools. There are only FOUR secondary schools: Mill Hill Country High School, Cophall Girls School, the Mill Hill Foundation (independent/private) and Hasmorean Girls' School, but the latter is a faith school and only two of the above are state schools. While Mill Hill County	The Local Plan reflects priorities identified in the Council's Education Strategy. That is the platform for setting out need. The Infrastructure Delivery Plan (IDP) provides an assessment of current infrastructure provision, future	No

		High is an outstanding school, it has a small catchment area, and children who live in Mill Hill East or Mill Hill Village have no chance of being offered a place. Cophall Girls school is a single sex school, alienating half the population of 11-18-year olds who need an education. Not all families can afford to pay for education, ruling out Mill Hill School. It is not stated in the Local Barnet Plan section 8 paragraph 8.2.4 that any new secondary schools will be funded. However, we feel there is a huge need for an additional secondary school in Mill Hill. The primary schools far outnumber the secondary schools leaving many families panicking about secondary school choices, and very disappointed when they cannot achieve their choice sufficiently close to home. There is an increase in demand for secondary schools as the population soars in the area. This need must be met with infrastructure to support the local community, especially its children, the future of this world. We have had discussions with the management of Compton School (Finchley) and they were keen to establish a 1200 pupil public secondary school on the IBSA Kingdom Hall site on the Ridgeway NW7. Such a school could insist that all pupils walk or cycle to school as it is close to Millbrook Park and other new developments along the Ridgeway. This would be hugely popular with local residents and their children, and would greatly reduce traffic congestion locally, and the anxiety for parents regarding their offspring using public transport. We would still like to see this brought forward and believe there are compelling reasons why it should happen. We are generally not in favour of faith schools as they do little to help social/cultural integration. Hasmonian boys and girls' secondary schools are in Mill Hill and Hendon, but since they admit orthodox Jews, for the most part, (and most of their students do not reside in NW7), they do not help to fill the secondary schooling needs for the rest of the population of NW7. Perhaps a greater emphasis on Science, Technology Engineering, and Maths (STEM) disciplines could be delivered in our schools working with the RAF Museum, Middlesex University, and a centre for children having a strong focus on educational active play which promotes STEM in a fun way. While the new Unitas centre at Montrose Park could help the 11-18 age group in this regard, a facility for younger children should be developed to encourage early interest in STEM. Perhaps an interactive Play Museum for children under 11, along the lines of that provided in Dubai by OliOli could be brought to Barnet. See link at https://olioli.ae Another example of a centre that focuses on learning through play and has excellent reviews is the Children's museum in Halifax. www.eureka.org.uk	needs, gaps and deficits, along with an indication of costs of providing infrastructure. This will be a live document that will be continuously updated. Planning Obligations in the form of CIL and S106 will be used to help deliver new social infrastructure in the Borough.	
Department of Education	Section 8.4.	The Plan refers to the Education Strategy for Barnet 2017-2020 as part of the evidence base. Advise that this evidence base be updated and monitored accordingly to ensure an up to date picture of the need for school places across the Borough throughout the plan period, acknowledging that need can change. This would help to demonstrate that the approach to the planning and delivery of education infrastructure is justified.	Agreed – references to new Education Strategy and Schools and Settings Improvement Strategy added	No
West Finchley Residents Association	Para 8.10	Fails to recognise the management of pavements in support of encouraging people to walk to ensure they are of a good standard, clean and maintained.	Pavements are not managed by the Planning department; however, the Plan does endorse the Mayor's Healthy Streets approach which seeks to improve street safety, comfort, convenience and amenity.	No
Finchley Society	Para 8.10.1	This paragraph should acknowledge the importance of access to even small but very local open space.	Agreed. All local open spaces make a contribution to health and wellbeing no matter how small	Yes
Friends of Finchley Way Open Space	Para 8.10.1	I agree that the built as well as the natural environment is a crucial element in physical as well as mental health. Over-densification of development in high and very high tower blocks can work against this. Access to small but very local (within 400 metres) open space is important. These small spaces may be rated as of low value, low quality as a result of being too small to support facilities that Barnet counts in its valuation of green spaces. However, these small spaces in otherwise fairly urban areas are highly valued by local residents and serve as havens for wildlife and may be parts of wildlife corridors.	All local open spaces make a contribution to health and wellbeing no matter how small	No

Friends of Finchley Way Open Space	Para 8.10.3	While I support the Healthy Streets initiative, care must be taken that this does not discriminate against those with limited mobility in an area of significant hills. Taxis are quite expensive if this is one's daily mode of transport.	There is no intention to do this through the Healthy Streets Initiative	No
Finchley Society	Para 8.10.3	The Healthy Streets initiative must not be implemented in a way that discriminates against those with limited mobility in an area of significant hills.	There is no intention to do this through the Healthy Streets Initiative	No
Finchley Society	Para 8.10.4	Public toilets are frequently vandalised, so their placement, safety and visibility is important.	Agreed. Reference made to good design and management of such facilities.	Yes
Friends of Finchley Way Open Space	Para 8.10.4	Public toilets are frequently vandalised, so their placement, safety and visibility will be important.	Agreed. Reference made to good design and management of such facilities.	Yes
Former MHNF	Para 8.10.4	We note that the Major of London established funding for water fountains in the Thames Water area and these are maintained over a 20-year lifecycle. How do we get a public (drinking) water fountain in our Town Square to reduce single use plastic bottles and to make available drinking water in our Town Centre in the interest of Health and Wellbeing? Reference 8.10.4	Through the Infrastructure Delivery Plan with support of Public Health	No
Finchley Society	Para 8.11.1	The draft Plan glosses over the implications that the projected population growth will have for primary care facilities (as well as for hospitals). These facilities will have to be accessible, not requiring long walks. The final Plan will have to deal fully and honestly with this subject.	The Council works closely with the NHS and the Local Plan has to reflect the priorities and programmes of the health sector in order to be found sound.	No
Finchley Society	Para 8.11.2	It is unclear what is proposed, and a short summary would be worthwhile. It is vital that GPs have access to, and use, up-to-date facilities.	Agreed. A cross-reference is added to the IDP and a short summary on future provision has been added to the text.	Yes
Friends of Finchley Way Open Space	Para 8.11.2	It is vital that GPs have access to, and use, up-to-date facilities. Cornwall House Surgery, for example, is not fit for purpose to deliver C21st healthcare in a C18th building with no lift and carpets 30+ years old.	The Council works closely with North Central London CCG to ensure that planned growth is supported by infrastructure. Government funding of the NHS is the main vehicle for ensuring provision of up-to-date facilities.	No
Finchley Society	Para 8.12.1	The Plan should indicate where these may be.	This is a matter for the Infrastructure Delivery Plan	No
Finchley Society	Para 8.13.2	We support Secured by Design and all efforts to design-out crime from public spaces and also from residential areas subject to personal attacks and burglaries.	The Council welcomes this support	No
Friends of Finchley Way Open Space	Para 8.14.4	I do not believe that pubs should not be included as assets of community value unless they are of historic importance.	Pubs will continue to be listed as ACVs as long as communities continue to nominate them.	No
Finchley Society	Para 8.14.5	Add as another indication how much the pub is used.	That is already covered by the question about positive contribution.	No
CAMRA	Para 8.14.6	Marketing evidence prefer 24 months; if this is not workable, then 'at least 18 months' would be acceptable.	Reference to 24 months marketing added to be consistent with London Plan.	Yes
Friends of Finchley Way Open Space	Para 8.14.6	I consider that the proposed conditions are far too restrictive on private sector businesses.	Such conditions are merited in order to protect these community assets	No
CAMRA	Para 8.14.6	Independent valuation - more details on the marketing exercise would be useful; for instance, it is important that pubs are offered free of tie and restricted covenant.	This level of detail is not appropriate for including in the local plan.	No
Finchley Society	Para 8.2.3	states that there will be an increase in the proportion of older and younger residents but seems to ignore those in the middle. Surely the current younger people will be middle aged by the end of the Plan timescale. Is anything planned for this age group? Transport is probably very important to them as they will be prime age working adults.	The older and younger sections of the population have more specific needs than those of the middle aged. It is right that the Plan should focus on these sections.	no

Clive and Gill Hailey	Para 8.2.4	Imperative that the Infrastructure Delivery Plan should be an integral part of the Local Plan and carefully linked to each & every development, so the essential improvements to infrastructure are available when housing is built, not afterwards. This should be related now with regard to the North London Business Park development, as for example it would seem that the secondary school expansion there is not matched by any additional primary school provision in the area, and there isn't any provision of additional library, community spaces or healthcare!	The IDP is an integral part of the supporting evidence base used to inform and justify the policies and proposals included within the plan	No
Finchley Society	Para 8.3.10	There should be a sentence or two about the (very significant) role of the voluntary sector and the help the Council will offer them.	Agreed. Revise text to acknowledge contribution of voluntary sector.	Yes
Finchley Society	Para 8.3.2	Second bullet point. There should be a wide range of facilities; some by their nature cannot be available to all but should not therefore be banned.	The Local Plan reflects that in principle such facilities should be accessible to all.	no
Finchley Society	Para 8.3.3	This is strongly supported.	The Council welcomes this support	no
Finchley Society	Para 8.3.8	In one of the largest London boroughs with inadequate swimming facilities, having to wait until 2036 for increased provision is unacceptable.	Agreed. Wording clarified.	Yes
Finchley Society	Para 8.4.1	Something much stronger and more precise is needed here or somewhere else in the Plan.	Text will be revised to reflect new Education Strategy	Yes
Finchley Society	Para 8.4.3 & 8.4.4	All this is too imprecise for a Plan. There must be an indication of where these facilities will be sited, as the population increases.	The detail on location of new facilities is provided by the Infrastructure Delivery Plan, to which a cross-reference has been made	Yes
Friends of Finchley Way Open Space	Para 8.4.4	Provision for young people must be inclusive and for all. The current text reads as if it is only for those from more deprived backgrounds who need 'multi-agency support'.	The text is inclusive. The multi-agency drop in centre is an example of a facility for young people.	No
Finchley Society	Para 8.5.1	Day centres need to be well publicised and outreach to those most isolated and lonely is vital.	Agreed although the Plan is not the best vehicle to publicise such services.	No
Friends of Finchley Way Open Space	Para 8.5.1	Day centres need to be well publicised and outreach to those most isolated and lonely is vital. It is these groups who lack the confidence to find out about support and to attend events as they worry about not knowing anyone and having nothing to say.	Agreed although the Plan is not the best vehicle to publicise such services.	No
Finchley Society	Para 8.6.2	The Council may place only 30% of those in care homes in the borough but others are likely to be current Barnet residents who self-refer.	Noted but this does not alter the approach in the Local Plan	Yes
Finchley Society	Para 8.6.3	Last sentence. Barnet is not an island. Adjoining boroughs have to work together. It must not seem as if Barnet 'doesn't want a load of old people being dumped here'.	Agreed but the text reflects that care home places in Barnet are purchased by other local authorities as well as the NHS and private individuals.	No
Finchley Society	Para 8.7.1	Barnet is not an island. Adjoining boroughs have to work together. If the last sentence identifies a real problem the plan has to offer a solution or mitigation for problems identified. Something should be added here.	Agreed. Priorities for provision identified in the IDP to which a cross-reference has been added. Future projects include : New Hendon Library, the expansion of several of the Borough's Libraries, improved signage and building maintenance works New primary and Community Care facility at Colindale and Brent Cross Regeneration Zone Urgent Care Centre at Barnet General Hospital Community based centres at Chandos (commercial nursery), Sweets Way (community based centre), Barnet Playing Fields Centre (mixed commercial and community use), Brent Cross South (community facility (at Market Quarter and Easter lands)), Brent Cross North (community facility), Colindale	Yes

			(community centre), West Hendon (community centre)	
Friends of Finchley Way Open Space	Para 8.9.2	I support the need for assets of community value to be used to show demand for community services and facilities when considering planning applications.	The Council welcomes this support	No
Finchley Society	Para 9.4.11	This is rather a counsel of despair, but may be necessary. The principles in 9.4.12 might however be adopted in LSIS as well.	The Local Plan seeks to safeguard employment land in LSIS and therefore adopts a realistic approach to co-location	No
Former MHNF	Para 9.4.5	We welcome the action you have taken to protect Industrial areas and Town Centres through Article 4 direction.	Support welcomed.	No
Finchley Society	Para 9.4.5	It is a little surprising that the borough expects an additional 67,000 m2 of office space to be required in District Town Centres (beyond the 400,000 m2 to be provided at Brent Cross). The BELR is now three years old, and, given the speed with which work arrangements are changing the research should be revisited before the Plan is finally adopted. New office buildings should be designed as flexibly as possible, so that they can be adapted for residential use if there is a long-term fall in the demand for offices.	The Plan has been revised to reflect the changes to the Use Classes Order and the introduction of Use Class E Commercial Business and Service uses. Given this shift to a more expansive Use Class where B1 offices form part of Use Class E there is little merit in revisiting evidence that was based on more specific use classes.	Yes
Finchley Society	Para 9.5.1	The Council's action to curb permitted development is much welcomed. The analysis should distinguish permissions from actually implemented conversions, and indicate how much office space remains, and what continuing pressure there is for conversions.	The Council welcomes this support. Additional text to highlight the monitoring of the Article 4 Direction in the AMR.	Yes
Barnet Society	Paras 8.12.1-2	Add a reference to the value of open spaces and green infrastructure for physical and mental health and wellbeing, exemplified by city and care farms.	The text in this section of the plan (8.12) already highlights the health and wellbeing value and benefits afforded by open space and green infrastructure.	No
Finchley Society	Paras 8.3.6 & 8.3.9	support the addition of new swimming and other recreational facilities. The new Copthall is heavily used, so much so that booking some classes is very difficult, especially those for older and less physically fit people.	The Council welcomes this support	No
Friends of Finchley Way Open Space	Paras 8.3.6 and 8.3.9	Support the addition of new swimming and other recreational facilities. The new Copthall is heavily used, so much so that booking some classes is very difficult, especially those for older and less physically fit people	The Council welcomes this support	No
Barnet Cycling Campaign	Policy CHW02	The council needs to do more than "Encouraging implementation of the Healthy Streets Approach, as set out in the draft London Plan". It needs to take responsibility and lead on this by directing all possible funding towards healthy streets schemes across the borough.	Agree the need for the Council to take a proactive approach – delete encouraging in part f of the policy.	Yes
Finchley Society	Policy CHW01	CHW01f. While we support Sport England's Active Design Principles, we are wary of some implications - for instance a tendency to try to co-locate community activities inappropriately. CHW01h There needs to be more precision for this Plan to be sound. What will be the procedure and criteria for this allocation? CHW01j Rethink the second leg. People may move into residential care in Barnet to be close to relatives - for instance ex-residents who retired out of London but now need to return. CHW01 Why is the sentence 'The Council will support proposals for new community infrastructure where the following circumstances apply.' so grudging? Replace by 'The Council will support proposals for new community infrastructure unless . . .' and follow by bullet points of contra-indications.	The Council aims to ensure that co-location increases access to services. Any sites allocated by the Plan are clearly identified in the Schedule of Proposals The Council's priority is serving the needs of its existing residents. The wording reflects that the Council wants the right social infrastructure in the right locations	No
LB Barnet Estates (GL Hearn)	Policy CHW01	We propose following addition - (K). The Council will support providers of new and improved facilities within the Borough, such as those at Middlesex University's Hendon campus and will encourage the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research."	Agreed	Yes

Department of Education	Policy CHW01	Amend part of the policy dealing with proposals for new infrastructure with an additional criterion to ensure that the overall policy approach is sufficiently flexible: "iv. It provides infrastructure in line with wider national policy requirements and local demands."	Agreed	Yes
Barnet Society	Policy CHW01	Add 'medical and dental services' to the 1st paragraph.	Agreed	Yes
HADAS	Policy CHW01	Add new point: <i>k) support development proposals that contribute to, or seek to incorporate, museum/display space to celebrate the history and archaeology of Barnet</i>	Agreed.	Yes
Brent Cross South Partnership (DP9)	Policy CHW01	Para h. states that sites will be allocated to address needs as identified in the Council's Education Strategy. Further clarity is needed at this stage on how and when these sites will be allocated. This policy as well as its explanatory text refers to a growing school/younger population but evidence to support this is not provided in the Education Strategy, which recognises that there has also been an 8% fall in primary demand.	Section on Children and Young People updated with reference to new Education Strategy 2021 to 2024 which reflects that the school population is changing	No
Friends of Finchley Way Open Space	Policy CHW01	f) While I support Sport England's Active Design Principles, in one respect I am wary of their implications. Many community facilities are heavily used and co-location is then inappropriate but I have noticed a tendency to try to co-locate community activities inappropriately. j) This needs to be treated with care as older people may be moving into residential care in the borough to be close to relatives. They may even be ex-residents who retired out of London but now need to return to be closer to relatives.	In making planning decisions we aim to achieve appropriate co-location. There are existing spaces available to offer such a choice.	No
Middlesex University (Tibbalds Planning)	Policy CHW01	Policy CHW01 makes no reference to further and higher education as part of the range of community infrastructure needed to support a healthy and successful population. We suggest that there is an addition to the policy, along the following lines: " <i>The Council will support providers of further and higher education by: encouraging the provision of new and improved facilities within the Borough, such as those at Middlesex University's Hendon campus; and encouraging the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research.</i> "	See response to LB Barnet Estates	Yes
JCoSS	Policy CHW01	In the context of this, JCoSS has reviewed the Draft Local Plan (Reg 18) and fully supports the recognition therein that the delivery of schools and educational facilities are needed to accommodate further growth and to make Barnet a great place to live and work for current and future populations. JCoSS also support L B Barnet's acknowledgement that education is one of the largest sectors for employment within the borough. Moreover, JCoSS is supportive of the inclusion of Policy CHW01 (Community Infrastructure) which states that the Council will work with partners, including JCoSS, to ensure that communities facilities such as schools are provided for Barnet's communities in a timely manner. The proposed extension at JCoSS (the application for which is currently being determined) aligns fully with these objectives by helping to meet a documented need for school places, adding capacity to a school with an excellent reputation within and beyond the Jewish community. We trust that these representations will be taken into account and we would be grateful to be kept informed of the Council's progress with the emerging Local Plan.	Support welcomed.	No
Sport England	Policy CHW01	Part d. Consider that the wording of this needs to be tweaked to include 'is surplus' rather than 'has ceased' as a surplus is higher a standard to prove. The policy seeks '...loss or replacement of existing... will only be permitted if: • the replacement facility is equivalent to or better quality and meets the needs currently met by the existing facility' which only partly aligns with the NPPF, paragraph 97, which seeks replacement facilities to be of at least equivalent quality, quantity and in a suitable location. As a result, Sport England does not consider this element to also align with national policy. Rather than 'no longer required' should say 'identified surplus', and in iii rather than 'ceased'.	Agreed.	Yes
Barnet Cycling Campaign	Policy CHW01	Identified need for increased pay-and-play accessible water space, equivalent to 2 new swimming pools (6 lane x 25 m) by 2036. None of the four sites mentioned are in town centres or easily reached by sustainable transport and so they all have large car parks. Safe	The Council recognises the importance of providing safe cycling routes and good public transport to enable people to more easily access community	No

		cycling routes and good public transport needs to be provided. In one of the largest London boroughs with inadequate swimming facilities, having to wait until 2036 for increased provision is unacceptable.	facilities such as swimming pools. The intention is that additional swimming pool provision is provided during the lifetime of the plan up until 2036.	
LB Barnet Estates (GL Hearn)	Policy CHW01	We support the provision of specialist housing to meet the needs of vulnerable residents living in the Borough as set out in Policy CHW01 Part (J).	The Council welcomes this support.	No
Department of Education	Policy CHW01 (h)	Amendment is required to the policy text to ensure consistency with the NPPF, and promote positive planning to ensure that schools are delivered to maximise choice, attainment and aspiration in Barnet. "h. allocate sites for development that address educational needs and demand with reference to up to date evidence as identified in the Council's Education Strategy;"	Agreed	Yes
Department of Education	Policy CHW01€	Clarify that developer contributions may be secured retrospectively when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. Amend part e of the policy to read: "e. require development that increases the demand for community facilities and services to make appropriate proportionate contributions towards existing facilities and new and accessible facilities borough-wide, particularly within Barnet's Growth Areas and town centres;"	Agreed	Yes
Barnet CCG	Policy CHW02	Define health impact assessment in the supporting text or glossary as follows:"Health Impact Assessment (HIA) is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population, or particular groups within it. HIA should be undertaken as early as possible in the planning application or plan making process to mitigate any potential negative impacts and maximise potential benefits."	Agreed	Yes
Barnet CCG	Policy CHW02	Define 'larger' developments by way of a housing unit and/or floorspace threshold.	Agreed. Definition added to Glossary. Large scale major – residential develop over 200 units or a site of 4 hectares or more. Non residential development over 10,000 m 2	Yes
Barnet CCG	Policy CHW02	Amend wording of second clause c) to read: Supporting the North Central London Estate Plan and the implementation of NHS Long Term Plan in responding to demand and integration of health and social care, including the use of developer contributions to support investment in healthcare infrastructure."	Agreed.	Yes
Barnet CCG	Policy CHW02	Merge together at 1 st part of policy and 2 nd clause a) should be merged to read: "The Council will promote the creation of healthy environments and safe, accessible, sustainable and high-quality places which seek to improve physical and mental health and reduce health inequalities. It will ensure that the health and wellbeing impacts of larger development proposals are addressed in an integrated and co-ordinated way through the use of health impact assessments."	Agreed.	Yes
Barnet CCG	Policy CHW02	Supports but suggests revisions to ensure that the policy and supporting text is clear and effective, using the 2017 Director of Public Health Annual Report on the built environment and health to help summarise the issues and impacts. Restructure supporting text to reflect the clauses in the policy, for example neighbourhood design, housing etc.	CHW02 has been revised to be more specific in terms of relevant policies	Yes
Finchley Society	Policy CHW02	CHW02 'to consider' is much too weak, especially following 'requiring'. Amend to 'build'; if it is felt that is too draconian, add 'save in exceptional circumstances, which should be fully justified.' CHW02a This is supported, but 'larger' should be defined.	CHW02 has been revised to be more specific in terms of relevant policies. Definition added to Glossary	Yes
Barnet Cycling Campaign	Policy CHW04	Accident rates have levelled off with about 100 people killed or seriously injured in road traffic accidents in the Borough every year. This policy needs to include targets for 2035 towards achieving the aim of Vision Zero: no KSIs by 2041.	Agreed. Reference added to reducing the number of road traffic accident casualties.	Yes
Finchley Society	Policy CHW04	Many of the measures listed here are admirable, but there is scepticism about their implementation and enforcement. The Plan should indicate the means that will be adopted and the resources that will be put into enforcement. Add street-begging to the list	Contributions from development through S106 and CIL will help deliver these objectives. No merits in a specific reference as street begging is a form of anti-social behaviour. Reference is made to limiting the opportunities for such behaviour.	No

Former MHNF	Policy CHW04	Ten years ago, few in Barnet would have raised concerns over Public Safety. This is far from true today. We do not believe that there are enough CCTV cameras in operation and fully monitored across Barnet, particularly in places with high footfall or where anti-social behaviour is known to be prevalent. Some of these cameras should be mobile such that there can be flexibility in their use. We understand the financial constraints and we are pleased to see pledges to deliver more police on the streets, but crime of all types, including notably violent crime have greatly increased, and the higher the population living in denser sites, the more we can expect crime related issues to arise unless adequate resources (people and technology) are deployed.	The Plan reflects a 'Secured by Design' approach.	No
Finchley Society	Policy CHW05	Perhaps add 'but ones that will positively help it will be supported'.	A change to the wording is not merited	No
Friends of Finchley Way Open Space	Policy CHW05	A2) I do not support proposals for new public houses in growth areas and town centres as part of mixed-use development. I believe that the clustering of pubs results in high levels of crime against the person and anti-social behaviour.	Pubs can make an important contribution to vitality in such locations.	No
CAMRA	Policy CHW05	Welcome support that this plan gives with regard to Public Houses, especially Policy CHW05, section d. Section b; ...vacant for a period of 'at least 24' months should also replace ..'at least 12'. In addition to Review of Public Houses in Barnet 2018 other useful documents to reference in helping pubs survive that set a clear justification for policy need are; 'Pubs and Places', Rick Muir, IPPR 2012 and 'Friends on Tap'. Robin Dunbar et al, CAMRA/ University of Oxford 2016.	Support for policy welcomed. Reference to 24 months marketing added to be consistent with London Plan.	Yes
Former MHNF	Policy CHW05	We support the moves to protect existing public houses, where appropriate. Mill Hill Broadway is strangely unique in that it does not have a pub currently. We would welcome such an addition which would fill a very real social and cultural void.	Support welcomed.	No
Historic England	Policy CHW05	We support the inclusion of a standalone pub protection policy given the cultural and heritage value of pubs. Draft New London Plan policy HC7 on Public Houses tells us that pubs should be marketed for 24 months; we recommend that the policy is amended to reflect this.	The Council welcomes this support. Reference to 24 months marketing added to be consistent with London Plan.	Yes
Mayor of London	Policy CHW05	The Mayor also welcomes Barnet's approach to protecting public houses in line with Intend to Publish London Plan Policy HC7.	We welcome the support	No
DC Rail Ltd (First Plan)	Chapter 9 Oakleigh Road LSIS	Rail freight operating company Devon and Cornwall Rail 'DC Rail' are in the process of securing a lease from Network Rail (NR) in respect of land known as 'Oakleigh Road South Railway Sidings' historically used for transfer of freight by rail and is identified by NR as a 'Strategic Freight Site' ("SFS"). DC Rail intend to reconnect and upgrade the historic sidings to facilitate the reinstatement as fully active freight site which will enable the bulk transport of minerals. These works are to be progressed under rail related permitted development rights Part 8 Class A of the GDPO (2015). Following reconnection of the land to the railway and with the sidings being re-established, the land can then be considered for a wide range of important aggregate, waste and material transfer functions along with associated complementary uses also potentially being considered. The land is currently utilised for a range of industrial and commercial operations and already forms part of an important stock of industrial business floorspace within the borough but not located within the designated 'Oakleigh Road South (Railway yard)' Locally Significant Industrial Site (LSIS) and not proposed to be any changes to the LSIS boundary within the 'Changes to Policies Maps' document accompanying the Draft Local Plan. The LSIS boundary is therefore proposed to maintain its current boundary, immediately neighbouring the site to the north, east and south. Works to re-establish the rail sidings will increase the site's significance and importance for undertaking industrial operations and it is considered that the land forms the function of a LSIS being a site of focus for industrial, storage and distribution and other employment generation sui generis uses. .Given the nature of the site and its proposed future uses for rail related operations as mentioned we wish to ensure that any neighbouring development has no potential to prejudice the future operation of the sidings for rail related purposes. Inclusion within the LSIS will assist in preventing any conflict in land uses in this regard.	A review of the LSIS boundaries will be merited in the next review of the Local Plan when the rail sidings are established	No

Glenroy Estates	Chapter 9 Alston Works LSIS	<p>Amenity of Residential Neighbours - Our client considers it inappropriate and contrary to regional planning policy to re-designate the site as an LSIS in the context of residential amenity and quality of living, especially after the site was released from this designation in 2009. NPPF paragraph 117 notes that planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. The LB Barnet 2009 Employment Land Review notes that the site would not attract any B8 occupiers, leaving the possible future uses of the Site within B1b, B1c, and B2 Use Classes if it were restricted by an LSIS designation. Both Employment Land Review documents note that the site is surrounded closely by residential properties. Due to the proximity of residential houses to the site, our client considers a designation which restricts uses to the aforementioned Use Classes would unduly affect the amenity of those living nearby, contrary to paragraph 117 of the NPPF. The area is generally in residential use, and it would be more logical to allocate the site for a mix of less disruptive employment uses and residential use, as these would complement the existing employment stock on site whilst responding to the residential dwellings immediately surrounding the site. Quality of Existing Site has been demonstrated through the Local Plan evidence base that the site is inappropriate for redevelopment as an employment site, as it ranked in the lowest category in the employment land assessment criteria in 2009. The site has the following issues making industrial development inappropriate: Very limited vehicular parking space on site especially for industrial sized vehicles; Poor access and a disjointed building layout results in congestion and over-spill onto the surrounding residential streets; Buildings are small and poorly placed which restricts the potential for large floorplates usually required by industrial uses. This reduces the attractiveness of the site to potential occupiers; Complete land-lock by residential buildings creates conflict with more intense industrial uses and eliminates the possibility of comprehensive employment redevelopment; The buildings on site are old with low floor to ceiling heights; The site is occupied by a range of different, non-industrial uses which have evolved over the years to give the estate a unique character. This assessment is backed up in the 2009 Employment Land Review and since then, the situation has not improved, but rather it has worsened. The updated 2017 Employment Land Review presents similar conclusions to the 2009 document. The draft designation is therefore contrary to paragraph 122 and 123 of the NPPF, which seek to support developments that make efficient use of land, to meet as much of the identified housing need, and to maintain an area's prevailing character. In this case, all evidence notes the site is poorly equipped for industrial use and is situated in a residential area. Indeed, Alston Works is enclosed on all sides by suburban residential buildings, with back gardens adjoining the rear of industrial buildings on site. Considering the surrounding environment, the quality of the existing stock and the current live/work uses on site, our client considers an LSIS designation would intensify the use on site to a point which would be detrimental to the amenity of local residents. Glenroy Estates Ltd is currently working on an updated residential-led mixed use scheme at Alston Works which has evolved from the 2017 pre-application scheme. The introduction of a designation that is not based on appropriate and proportionate evidence will compromise the economic function of the site. Our client strongly requests the designation is removed from the LB Barnet policies map to allow more appropriate uses to come forward in this location.</p>	<p>The Council is guided by the 2017 BELR, and its recommendations which supported the introduction of an Article 4 Direction to safeguard what were previously B1a and B1c uses.</p> <p>With regard to Alston Works the BELR acknowledges the site is congested however it also says that there is a mix of employment uses occurring on site. There are several employment sites across Barnet that are within largely residential areas, however it does not necessarily follow that these sites are bad neighbours to the surrounding residential. Policy D13 of the London Plan also acknowledges such situations. Many such sites also offer services that are of value to the residents as well as ensuring a functioning local job market. As acknowledged by the London Plan employment sites of varying age and quality are important to local economies around London as their rent is often offered at levels which is more affordable to start ups and SMEs and therefore that quality is not reason alone for the loss of employment space.</p> <p>There is flexibility within a LSIS designation for safeguarding creative industries as at Alston Works</p> <p>Paragraphs 8 and 80-82 of the NPPF require Planning policies to recognise the importance of a strong local economy and encourage strong economic growth.</p> <p>Since the 2009 ELR the employment land availability in Barnet has been impacted by the changes to the permitted development rights as well as incremental loss. The Council subsequently brought in a number of non-immediate Article 4 Directions to manage any further loss of employment land. The 2017 BELR supported the justification for the Directions and Alston works was included in the list of sites where Article 4 Directions were confirmed in 2019. It was one of the non designated industrial sites additional to the existing LSIS sites where Directions were confirmed.</p>	No
Finchley Society	Chapter 9	<p>This Chapter should consider retail and service sector employment (now mainly in Chapter 7) alongside industrial and office employment. Jobs in sectors such as construction, home maintenance or transport may not fit in either chapter. There should be more attention to public sector jobs (education, NHS, transport, etc.). A more fruitful approach might be to look at all employment together, examining the relevant sectors in their specific context. This would fit more closely with the perspective of Barnet</p>	<p>The Plan has been revised to reflect the changes to the Use Classes Order and the introduction of Use Class E Commercial Business and Service uses.</p>	Yes

		residents, whose need is for a job that is suitable to their abilities, at an acceptable wage and with good working conditions. The Economy chapter would then cover all employment-creating activities.		
DWD Property & Planning	Section 9.4	Projections for industrial land requirements in Barnet over lifetime of Local Plan have been calculated as part of the LPA's draft Local Plan evidence base, and the key documents are referred to within Section 9.4.1. The Council's evidence base establishes the LPA's forecasted demand for industrial land across the lifetime of the Plan. On the basis of land demand methodology, the London Industrial Land Demand Study (LILDS) estimates that Barnet would need 7.3 ha of industrial land to meet forecast demand across industrial sectors. Furthermore, the West London Employment Land Review (WLELR), using a labour demand methodology, indicates that 13.5ha would be required. Significantly, both studies demonstrate that a significant amount of industrial space is needed in Barnet. It is recognised the economic strategy of the draft Local Plan (set out in Section 9.6.3) relies on the recommendations in the BELR and as such designates seven new LSIS which DWD understands are proposed at: Bittacy Hill (0.8 ha), Coppetts Centre (1.1 ha), Falkland Road (Alston Works) (0.5 ha), Hurricane Industrial Park (0.4 ha), Propeller Way (0.4 ha). Firstly, the wording of the draft Local Plan is not clear as the Plan does not appear to list seven sites. In any event, it is not clear why the recommendations of the BELR were followed instead of the WLELR which sets a higher industrial land requirement based on projections of the labour market over the lifetime of the draft Local Plan. DWD considers that the draft Local Plan fails to be 'justified' as per paragraph 35 of the NPPF as the strategy does not appear to meet the Borough's objectively assessed needs for industrial floorspace over the lifetime of the emerging Plan. It is considered that the draft Local Plan has conservatively planned for the continued growth of the industrial sector and the draft employment policies may constrain the growth of the sector further unintentionally. Our consideration of the implication of the policies is explained further below.	At the time the WELR was in production the additional 7 sites were not designated LSIS they are however functioning non designated industrial sites identified in the BELR. The consultants undertaking the WLELR were made aware of the BELR and the non immediate Article 4 Direction areas which at that point had been made but not confirmed and which included these 7 sites. These sites were therefore grouped together as the non designated sites (along with other non-designated sites identified as part of the study) and included in the analysis of demand for employment land in Barnet. The conclusion being that Barnet was in need of an additional 13.5ha of industrial land in addition to existing land (both designated and non-designated). Taking this evidence into consideration the non designated sites that were confirmed as Article 4 Directions have been identified for designation in the draft Barnet Local Plan.	No
Network Rail	Section 9.4	NR are very keen to protect and get the freight site included in this. We do note that there are no current plans to change this boundary. However, the freight site is without a particular site-specific description. We would like to get it highlighted within Oakleigh Road South Railway, the LSIS, as the following. Reserved as a Strategic Freight Site within railway classification. Potential for future railhead which needs protecting given environmental benefits this would bring by increase of goods and material moving by rail, as a sustainable transport form, rather than road. Zoned within Crossrail 2 safeguarding zone. Industrial and employment uses remain most suitable in the interim, including waste and construction related activities. Given the nature of the site and its potential for future uses we want to ensure any neighbouring development has no effect on the operations of the sidings or any Network Rail Land in the area. Including this freight site within the LSSI will prevent any contradictory land use issues rising.	There is strong policy protection within the Plan through the LSIS and the Crossrail 2 safeguarding	No
Dalton Warner Davis LLP	Section 9.4	Changes to the Policies Map (Reg 18) (January 2020). This document in outlining the amendments to the Proposals Map includes changes to the Garrick Estate to incorporate the addition of Wilberforce House. Of note are the changes proposed to the LSIS designation of the Connaught Business Centre. A small site adjoining the main centre has been added to the designation whilst the existing LSIS designation has been retained from the Adopted Local Plan Proposals Map. The proposed LSIS designation therefore does not reflect the existing situation on-site, where the western section of the Connaught Business Centre has been released for residential-led development as part of the Homebase planning application (ref: H/05828/14). The above discrepancies between the Adopted Local Plan, Draft Local Plan and BELR with regards to the Borough employment land stock and LSIS designations will require review as part of the revisions to the Reg 18 Draft Local Plan. This offers the opportunity for further consideration of the evidence base and the resultant LSIS site designations in the Draft Local Plan including the Site.	Reviews of individual LSIS boundaries are not merited at this stage. There is sufficient flexibility within Policy ECY01 with regard to the existing situation. This is more appropriately considered through a full review of all LSIS designations when the Local Plan is next reviewed	No

Finchley Society	Section 9.6	In view of the probable continued decline in industrial activity in the borough, is it justified to retain all of the LSIS? Where sites become vacant, might it be appropriate to consider whether they might be put to better use for residential development?	The Local Plan seeks to retain and safeguard employment land in order to support business and future jobs growth.	No
Finchley Society	Policy ECY01	ECY01j(iv) Replace 'an unacceptable impact' by 'any adverse impact' on residential amenity. 'unacceptable' can be a vague term which would give developers an opportunity to prevaricate.	Agreed. The Plan has also been revised to emphasise Agent of Change principle more clearly	Yes
DWD Property & Planning	Policy ECY01	LPA's strategy for allocating employment land appears to be insufficient to meet the projected requirements for floorspace over the lifetime of the Local Plan and does not contain sufficient flexibility to take advantage of additional development opportunities on non-designated industrial sites in conflict with national policy. We also consider that the draft wording of policy ECY01 is overly restrictive and would likely generate unanticipated consequences in its current form. We consider the policy could be reworded into a permissive condition that would give the LPA more flexibility in determining applications for employment uses outside of LSIS which would truly encourage the redevelopment of acceptable sites.	Barnet's designated LSIS are the focus for employment focussed development, where industrial land uses and office space will continue to make a valuable contribution to the local economy. In addition to safeguarding employment land the Council will consider proposals outside of LSIS that will contribute to a vibrant local economy.	Yes
DWD Property & Planning	Policy ECY01 (J)	Draft wording of section j of policy ECY01 is fundamentally flawed and would fail to meet the tests of soundness. Section j of the policy is updated to read: "Supporting new employment space outside of the locations outlined in (a), (b) and (c) if the following criteria are met: The new employment use would contribute towards the Council's regeneration objectives Employment uses which generate high levels of movement should be located in close proximity to tier one and two roads The new use does not have an unacceptable impact on residential amenity The site is not allocated for an alternative use including residential, education or community uses". Policy could be updated to benefit the LPA in assessing applications and facilitating development Section J of the policy should reflect that there are other sites in the Borough that are not designated as LSIS that would also be suitable industrial sites, including various sites that would be classified as 'white land' where no specific policy allocation would apply, including out of town retail facilities. Draft wording of Section J would fail to meet the national tests of soundness and is overly restrictive which would preclude the development of appropriate sites outside of LSIS to provide valuable contributions to industrial land in Barnet. Requiring developers for proposals outside of LSIS to meet the aforementioned tests would fundamentally not create conditions in which businesses can invest, or indeed support economic growth. This section of the policy should be deleted.	Agreed	Yes
DWD Property & Planning	Policy ECY01	Constraining the potential of appropriate sites in the Borough through the application of draft policy ECY01 would limit the sustainable economic growth the LPA is seeking to facilitate. Draft Local Plan does not meet the national tests of soundness, propose that the relevant section of policy ECY01 is reworded.	ECY01 reworded to clarify that the Council is seeking a vibrant local economy across the Borough	Yes
Sport England	Policy ECY01	Quoting the impact of sport on the economy and as an important employer, it is suggested that the Plan should consider D2 sports uses and/or sport and recreation facilities to be acceptable on employment sites and not just focus on B uses.	Former D2 uses now form part of the wider E Commercial Use Class and continue to be encouraged in town centres – see TOW04.	No
DWD Property & Planning	Policy ECY01	Contest that any employment space outside of town centre/edge of centre and LSIS locations should be 'small-scale' as set out in section ii of the policy requirement for 'small-scale' development is removed.	Large scale sites suitable for employment use should be identified in the plan as a site proposal.	No
DWD Property & Planning	Policy ECY01 (iii)	section iii suggests any new employment space outside of designated areas should be part of a 'meanwhile use'. This would preclude significant investment in the Borough for potential owner/occupiers of industrial schemes.	New employment space being provided as part of a meanwhile use is likely to be supported, rather than this being a requirement.	No
Redrow Homes	Policy ECY01	Part a) should be amended to allow the loss or re-provision / rationalisation of office space with a TC if it can be demonstrated that there is no demand. Part d) should also include the potential for co-location of residential uses within certain LSIS's (Policy E7 of draft London Plan).	Part a) considers if the site is no longer suitable or viable – which includes 'demand'. Policy E6 does not include residential as part of co-location uses within LSIS.	No
St William Homes LLP	Policy ECY01	We welcome the preferred approach of Policy ECY01 'A Vibrant Local Economy'; however, as set out in para 14 of this representation, flexibility will need to be applied to former utility sites (usually Sui Generis).	Support welcomed. There is no need to make specific reference as there is flexibility enough in the Local Plan to consider former utility sites.	No

Harrison Varma Ltd	Policy ECY01	As currently worded, as well as safeguarding office space in Town Centres and edge-of-centre locations Policy ECY01 will require any proposal to replace office accommodation anywhere else in the borough to demonstrate a lack of existing demand through provision of evidence of at least 12 months of vacancy and marketing. Since October 2019, a number of areas within the Borough have had an Article 4 Direction applied to remove permitted development rights to change from office to residential use. In applying those Directions, the Borough has chosen to allow the permitted development right to be maintained in many locations. Given this, it is suggested that Policy ECY01 should only apply to those locations that are specifically designated for the protection of existing office accommodation and/or where the Article 4 Direction applies. Outside of these locations, the principle of replacing office accommodation should be acceptable if it delivers on other priorities of the Local Plan. Most notably, this could be the optimisation of sites for residential development.	The Article 4 Direction is a response to the Government's changes to permitted development of office to residential. It covers the sites that are most important to the economic sustainability of the Borough. It does not confirm the Council's support for permitted development elsewhere. The poor quality of office to residential is well documented in Barnet's Article 4 Direction and the impact it has on quality of life is amplified by the COVID19 lockdown. The Local Plan seeks to work with developers to optimise housing delivery and considers that this is best done through the application of planning policies including Policy ECY01.	No
Mayor of London	Policy ECY01	Whilst the Mayor strongly supports Barnet's policies that protect and seek to intensify industrial land, it should be noted that he has raised concerns to other West London Alliance boroughs regarding the West London Employment Land Review (WLELR). As noted in Local Plan paragraph 9.4.8 the methodology for forecasting industrial demand in the WLELR uses a labour demand methodology which does not follow the economic demand methodology at set out in the London industrial land demand study 2017, which has been accepted by the London Plan Examination Panel. In addition, the methodology for the WLELR does not take into account the demand for waste and transport over the plan period. The Mayor welcomes Barnet's acknowledgement that the London wide strategic evidence and the WLELR both identify a demand for additional industrial capacity in Barnet. Barnet has responded positively to this evidence by designating additional Locally Significant Industrial Sites (LSIS) and generally only allowing industrial uses within these areas. The Mayor would also welcome the intensification of these areas in line with draft Local Plan Policy ECY01d). The Mayor has no objection to the de-designation of LSIS where the area no longer functions as a predominantly industrial area. However, to protect remaining well-functioning industrial sites Barnet should include a policy on non-designated industrial land or refer to Intend to Publish London Plan Policy E7C. In this regard Barnet's Site Allocations should not allocate non-designated industrial sites for other uses so that their potential for continued industrial use can be fully assessed. The Mayor also welcomes the approach in draft Local Plan Policy ECY01c) limiting office use within LSIS to an ancillary use. It should be made clear that any office use should be ancillary to a business operating within the LSIS. The protection of Class B1(a) floorspace as set out in proposed Local Plan Policy ECY01h should not apply to LSIS where it can be replaced with an industrial use such as B1(c) floorspace. The Mayor strongly welcomes the design criteria set out in draft Local Plan Policy ECY01k requiring all employment space to be designed to appropriate floor to ceiling heights and space requirements for the intended uses including on site servicing and space for waiting or goods vehicles.	The text also clarifies that both studies demonstrate that industrial space is needed in Barnet and safeguarding of existing industrial land is important. The text and policy has been amended to allow for intensification and co-location of industrial -uses while ensuring that these do not limit the functioning of the industrial sites. ECY01(h) relates to existing Article 4s within the Borough. London Plan Policy E7C has been included into ECY01 (i)	Yes
New Barnet Community Association	Policy ECY01	400,000 sqm of office space at Brent Cross seems excessive and disproportionate to the rest of the Borough	This figure reflects the existing planning consent	No
Mayor of London	Policy ECY01	As set out above, beyond the indicative job figures set out in Intend to Publish policy SD1 for Barnet's Opportunity Areas, Policy E1 directs offices to town centres and notes that there is limited demand for office development in outer London. The Mayor welcomes draft Local Plan Policy ECY01 which seeks affordable workspace where office uses are no longer suitable or viable. This approach could extend to general B1(c) light industrial where there would be no adverse environmental impacts on existing and nearby occupiers.	We welcome this support. ECY01 revised to reflect changes to the Use Classes Order	No

Ropemaker Properties	Policy ECY01	ECY01 currently resists 'co-location' at LSIS sites (including GRIE), which appears to be on the basis of the agent of change principle. SoS's letter to the Mayor directs that Policy E4 should be redrafted to focus on the overall supply of industrial capacity rather than its retention on a site by site basis.	Within the LSIS designation, the Council expects any proposal for co-location to overcome any conflict with existing and emerging policy as set out in Barnet's Development Plan, which includes the London Plan..	No
Mayor of London	Policy ECY02	The Mayor supports Barnet's aim to deliver a range of business space as well as to secure affordable workspace. Proposed Policy ECY02 should distinguish between the two as set out in Intend to Publish London Plan Policies E2 and E3 and set out the specific requirements for affordable workspace in line with Intend to Publish London Plan Policy E3.	Agreed. Policy revised	Yes
Finchley Society	Policy ECY02	This policy, or the Plan elsewhere, should encourage a greater land use mix, so that walking or cycling to work is practicable. The connection between employment opportunity and the need to commute is missing from the Plan. In Finchley, unless people commute, almost all the opportunity exists in servicing activity.	Agreed. The Local Plan response to COVID 19 seeks to encourage more sustainable forms of transport for accessing work within Barnet and nearby.	Yes
Finchley Society	Policy ECY02	ECY02a Delete 'or low-cost'. The distinction between 'affordable' and 'low-cost' is explained in paragraph 9.7.2, where it is stated that the two types of workspace are not interchangeable. A developer should not be able to meet the obligation in ECY02a by developing a category of low-quality space which is then let at 'low cost' (i.e. cheaply).	Agreed. Wording revised to be more consistent with London Plan	Yes
Former MHNF	Policy ECY02	We welcome policy ECY02 which shows initiative in providing 'Affordable Workspace' and trust that this may also apply to the supply of studio space for artists and not just for office-based businesses and their staff.	Support welcomed.	No
St William Homes LLP	Policy ECY02 & ECC05	An alternative option of 'no policy' is suggested for Policies ECY02 and ECC05. These are merely repeating both national and regional policy and therefore are not needed.	Comment noted.	No
Barnet Cycling Campaign	Policy ECY03	To support policy ECC01 (Mitigating Climate Change) this policy should include supporting jobs in the industries and infrastructure we need to tackle the climate crisis.	This can be promoted through the emerging Employment and Skills Strategy	No
Pocket Living	Policy ECY03	Additional text should be added to the policy: 'In exceptional circumstances, where the nature of the site or development does not support delivery of these target, the council will seek a realistic agreement that recognises the site and development circumstances.'	Reference to exceptional circumstances is already made in supporting text and within Policy ECY03	No
Redrow Homes	Policy ECY03	Support	Welcome the support	No
Glenroy Estates	Table 14	Glenroy Estates Ltd is a property development company and major landowner in London and is the freehold owner of Alston Works at Falkland Road. Glenroy has an interest in bringing forward a planning application for the mixed use residential led redevelopment of Alston Works. Our client received written pre-application advice from LB Barnet in August 2017 regarding the demolition of some of the existing employment buildings on site and the development of a mixed-use residential led scheme. The principle of residential use on this site was considered acceptable subject to design and privacy matters and the retention/re-provision of appropriate levels of employment floorspace. The site comprises several former commercial and industrial buildings with associated yard space and car parking between the buildings. The quality of these buildings varies as does the height. The height ranges between 1 to 4 storeys. The buildings are predominantly in use as live work units on the upper floors, with some employment uses throughout the site on the ground floor including a car repair garage. The site has 3 vehicular and pedestrian access points, two from Falkland Road to the north and one from Alston Road to the south. The site is closely surrounded by 2-3 storey terraced housing and is in a sustainable location approximately 300 metres from the centre of Chipping Barnet. The site has a PTAL of 2. The buildings on the site are not listed, locally listed nor within a conservation area, but the site is located at the northern most point of the borough approximately 200m to the south of a large expanse of Green Belt land, Planning permission, LPA ref. B/02621/13, was granted at the site in May 2014 for the continued use of 30 units within the existing buildings as live work units. According to the latest figures published	Barnet's designated LSIS are the focus for employment focussed development, where industrial land uses and office space will continue to make a valuable contribution to the local economy. In addition to safeguarding employment land the Council will consider proposals outside of LSIS that will contribute to a vibrant local economy.	No

		by MHCLG, LB Barnet failed to meet the 95% housing delivery requirement between 2016 and 2019. The Borough has now produced an action plan identifying the causes of under-delivery and a way to address it. The Draft Local Plan seeks to designate Alston Works as a Locally Significant Industrial Estate. Our client strongly opposes this designation as it does not accurately reflect the current uses on site, nor the prevailing character of the local area. The Draft Local Plan seeks to designate Alston Works as a Locally Significant Industrial Estate. Our client strongly opposes this designation as it does not accurately reflect the current uses on site, nor the prevailing character of the local area. There are a number of material planning considerations that must be taken into account when deciding whether the site is suitable for a stronger industrial designation by the draft Plan.		
Natural England	Chapter 10	There may be further opportunity for thinking on Natural Capital within the Local Plan. We suggest that an additional objective could address Natural Capital, such an objective might be “to conserve and enhance Barnet’s natural capital and ecosystem services”. It could also be considered as a cross-cutting theme. Opportunity mapping work for natural capital and habitat networks could be undertaken to inform the plan and Sustainability Appraisal, supported by baseline and opportunity mapping. We consider that Green Infrastructure and Natural Capital are closely linked and can be delivered side by side. The role of the planning system in recognising the wider benefits from natural capital is highlighted in NPPF para 170. Spatial planning at this scale is an ideal opportunity to assess the existing Natural Capital of the Borough (see NPPF para 171), to plan to conserve those features providing key ecosystem services and address deficits. Natural England recently published the Natural Capital Atlas. As well as providing a baseline against which to measure change, the Natural Capital Atlas can be used to understand which ecosystem services flow from different ecosystem assets across England. The atlas shows where there are both strengths and weaknesses in the quantity and quality of ecosystems. This can inform opportunity mapping of where to enhance existing natural capital and where to target its creation for the provision of multiple benefits.	The Vision and Key Objectives have been revised to integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and green and blue infrastructure,	Yes
Natural England	Chapter 10	Natural England focusses our advice on embedding biodiversity net gain in development plans, since the approach is better developed than for wider environmental gains. However your authority should consider the requirements of the NPPF (paragraph 72, 102, 118 and 170) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space or biodiversity strategies. Opportunities for environmental gains, including nature based solutions to help adapt to climate change might include: Identifying opportunities for new multi-functional green and blue infrastructure, Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient, Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape, Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links, Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore), Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habits. Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.	Agree – examine how the Plan Policies & Site Allocations can contribute to wider environmental enhancement.	Yes
Natural England	Chapter 10	Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks. Planning positively for ecological	Agree – supporting text of Policy ECC06 revised	Yes

		networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF. Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced standing advice on ancient woodland, ancient and veteran trees. Please note that your borough contains sections of ancient woodland but there is currently no mention of ancient woodland in the Local Plan. We recommend appropriate addition of policy protection for these areas of woodland.		
Natural England	Chapter 10	Include policies to ensure protection and enhancement of public rights of way, as outlined in paragraph 98 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 97 of the NPPF.	Ensuring Barnet's network of public rights of way are protected and enhanced as a means for walking is a crosscutting feature of the Local Plan	Yes
London Diocesan Fund (Iceni Projects)	Chapter 10	A key priority of the Council's Growth Strategy is to deliver social infrastructure to support growth through ensuring that schools and leisure, health and community facilities are delivered to support areas of growth and regeneration. By 2036, the borough will see a 4% increase in the number of young people aged 0-19 to 103,000. The Council are seeking for the majority of schools to come forward within the Growth Areas, therefore it is likely they will take longer to be delivered. Further to this, there is no clear Infrastructure Plan which demonstrates how needs for schools will be met in the Local Plan. The council need to seek a more proactive approach to delivering this and extending Mount House School provides a short-term opportunity to meet educational and recreational needs in the Borough. Greenfield sites in particular can provide larger school grounds with a greater range of recreational facilities on site, which aren't available at other schools in the area, which makes this site more appealing to Barnet when deciding where to focus development through the emerging Local Plan. Recently, both the Department for Education (Securing Developer Contributions for Education) and CLG (revisions to Planning Practice Guidance) have published guidance on collecting developer contributions to fund new school places. This is part of a significant shift of emphasis away from Central Government funding the bulk of new school places towards a situation whereby developers will be expected to deliver them, where it is directly arising from new housing growth. Up until now, the Free School Programme has been heavily funding the delivery of new schools, with 442 schools open and a further 262 in the process of opening since 2010. The Free School Programme now appears to be decelerating and in the future it is expected to be smaller and focused on assisting with Government objectives of improving social mobility. This does not mean that England does not need more schools; housing targets in new Local Plans will create a need for new schools - but as this need is perpetual Central Government will increasingly expect developers to pay for it. This policy change will also have wider ranging implications for both local authorities and developers when identifying new sites. Local authorities will need to be robust when identifying where schools will be located and the level of growth they will need to meet. The feasibility of new schools will require proper testing at Local Plan stage as Central Government will no longer provide a fallback position to deliver schools on a windfall basis. In order to determine how to deliver sufficient school places in the Borough for state and independent schools, the Council should set out a clear plan on how and where they intend to address this emerging need. This is required by NPPF para 94 which requires that local authorities take a proactive approach in their Local Plan to expand choice for school places. Given that new residential development is identified in built up area, the ability to deliver schools on these sites will be limited and Green Belt sites will be required to ensure that enough school places can be delivered within the relevant timescales. Failure to do so could leave Barnet in a position whereby they cannot deliver sufficient school places as they do not have sufficient land or funding. The Council has produced an Indoor Sports and Recreation	The Council's priorities for new school provision are expressed in the Educational Strategy 2021- 2024 and this is reflected in Chapter 10 of the Local Plan as well as the Infrastructure Delivery Plan.	No

		<p>Facilities Study which provides an assessment of the needs for a range of indoor sports facilities in the Borough. The Strategy is intended to guide future provision of indoor sports facilities to serve existing and future residents in the Borough. This states that although the Borough has good sports facilities, there are some ageing facilities which will require replacement/ refurbishment in the plan period. Based on the quality audits and assessments, supply and demand, and the needs analysis, the priorities for future investment in facility provision are:</p> <p>Sports Halls • Increased community access to existing sports hall facilities; • Secured access for community use incorporated as part of planning conditions; • Long term replacement / refurbishment of ageing facilities. Swimming Pools • Increased swimming pool provision; Gymnastics and Trampoline • Potential to explore further provision given high numbers on waiting lists. The Council place an emphasis on both increasing community access to existing facilities and the replacement of ageing facilities, although in the absence of an Infrastructure Delivery Plan it's not clear how these facilities will be funded and thus when they will be delivered. Rectory Farm provides an opportunity to deliver new and well-designed sports facilities in the short-term as part of a wider expansion of Mount House School whilst delivering much needed family housing. The Diocese are in discussion with the school to provide part of the site for a sports centre and they have confirmed support for community use.</p>		
Natural England	Chapter 10	<p>The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites. Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: Habitats and species of principal importance in England. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.</p>	<p>The Local Plan is supported by the London Environment Strategy and the London BAP. The Council intends to commission a Barnet BAP as part of it's actions for biodiversity enhancement and looks forward to working with Natural England on it's production.</p>	No
Natural England	Chapter 10	<p>The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in NPPF para 96. Natural England's work on Accessible Natural Greenspace Standard (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.</p>	<p>Supporting text for Policy ECC04 makes reference to the Accessible Natural Greenspace Standard (ANGSt)</p>	?
Middlesex University (Tibbalds Planning)	Chapter 10	<p>As a significant stakeholder and user of the facilities, the University welcomes the identification under Para 4.24.3 of the Cophall Playing Fields and Sunny Hill Park as one of three major sports hubs within the Borough and the need for ongoing improvements to the sport and recreation facilities in this location. The University requests that it is fully included in future consultations over these improvements and wishes to stress, in particular, the need for better public transport access to the facilities in this location.</p>	<p>The Council welcomes this support and will ensure engagement with the University with regard to Cophall and Sunny Hill Park</p>	No
East Finchley Community Trust	Chapter 10	<p>East Finchley ward's only local park Cherry Tree Wood has suffered considerable neglect in recent years voluntary activity to rectify this needs to be supported by a borough plan. Play space in Market Place (adjacent to the The Walks) has also suffered from lack of investment. Welcome inclusion of more details to enhance local walking routes (known as The Walks) and to encourage the use of these routes and to explicitly link them to the local park and a strategy for greening The Walks and upgrading the play space in Market Place and investment in Cherry Tree Wood. There are other vital fragments of green space such as the Community Garden outside East Finchley tube which is a haven for pollinators which could benefit from being linked to a "green corridor". New development at Prospect Place East</p>	<p>The Local Plan includes policies that seek to protect and enhance parks, open spaces and green infrastructure corridor linkages. This level of detail is more appropriately articulated at the neighbourhood planning level and is therefore an option for the Trust to pursue.</p>	No

		Finchley adjacent to The Walks every effort should be made to develop green space around this area and to make a “green corridor” through the ward to the local park. There are other vital fragments of green space such as the Community Garden outside East Finchley tube which is a haven for pollinators which could benefit from being linked to a “green corridor”.		
Wade Miller-Knight	Chapter 10	Plan has missed opportunity to establish a Nature Corridor along the Silk Stream and also queries land between Dollis Brook and Totteridge Lane not being put forward for development as not valuable open space for nature or public amenity.	The Silk Stream is included as a Grade II Site of Borough Importance and is also included in Policies GSS06 and ECC06 to ensure restoration and protection. Annex 1 also refers to Silk Stream improvements alongside any proposed development.	No
Friends of Finchley Way Open Space	Chapter 10	I support policies to improve air quality and reduce carbon emissions and to generally mitigate against climate change. I also support noise reduction measures as continuous noise, even at a low level, can have mental health impacts.	This support is welcomed	No
Former MHNF	Section 10.3	The most worrying issue in this section is the lack of recent activity to address air quality across Barnet. We assisted the Council and UCL (2016) in an exercise to establish the levels of Air Quality in some 60 location across the borough. Little or nothing has apparently happened since, to address the issues which highlighted air quality at levels as much as 150% above EU maxima.	Requirements for Air Quality Assessments and Air Quality Neutrality have been updated.	Yes
Former MHNF	Section 10.4	For those with private vehicles the recycling centre at Summers Lane is of great benefit. Many people call for the reintroduction of occasional skips in housing areas, notably for the benefit of those who cannot transport items to Summers Lane. However, we are experiencing increasing levels of fly-tipping and this requires strict levels of enforcement, which should be paid for by a reduction in the need to clear-up after the culprits.	The Council continues to use its legal powers to take action against fly-tipping.	No
Friends of Finchley Way Open Space	Section 10.4	The recycling facilities in the borough need up-dating and expanding. In particular it is the only London borough that does not collect food waste, for which there is a market in heat generation. The state of the streets in the borough is a disgrace and compares very badly with other boroughs, including some inner city boroughs. A revised street cleaning and domestic bin provision strategy is urgently needed. This is a serious health matter. The Council should consider making access to local recycling centres free to industrial users to reduce the incentives to fly tip. Weighed against the cost of clearing fly tipping, surely it would be cost effective.	The food waste collection service was suspended in November 2018, as there was a need to review how the recycling and waste services could be delivered in a way that is both economically and environmentally beneficial. The council is working to reintroduce the food waste service from April 2022, and this is included in its Reduction and Recycling Plan submitted to the Mayor of London.	No
Natural England	Section 10.5	We welcome the consideration of climate change and recommend the Local Plan highlights the role of the natural environment and nature based solutions in mitigation and adaptation to climate change.	Agree – text revised	Yes
Natural England	Section 10.5	A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We note that your authority has a Green Infrastructure SPD although we have not reviewed this SPD in relation to the Local Plan. We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.	Barnet has demonstrated a strategic approach to Green Infrastructure through its SPD in 2018. This approach is further strengthened by the policies in this Local Plan.	Yes
Natural England	Section 10.5	Natural England recently published a 2nd edition of its Climate Change Adaptation Manual which includes a Landscape Scale Climate Change Assessment Tool. This tool can be used to identify natural assets (e.g. different habitats and species) in the borough and identify adaptation responses that can be incorporated into a plan to create a resilient landscape across the borough. Consideration could also be given to whether the plan recognises the role of ecosystems and soils in carbon sequestration. A	Agreed. Text revised.	Yes

		strategic assessment of natural assets and Green Infrastructure across the borough can be useful in planning for increasing borough resilience to climate change.		
Former MHNF	Section 10.5	We are supportive of the Council's activity to protect Green Belt and Metropolitan Open Land and their Parks and Open Spaces strategy. In the latter we have seen sites such as Cophall Open Space sectioned off to competing sporting demands so that there is little or none of the area left for walking or enjoying a picnic. Certainly, areas of Green Belt and Metropolitan Open Land must be robustly defended against the development of hard structures that remove the primary purpose of such spaces as the lungs of London, performing a vital role in improving air quality. We think you should provide a new Green Belt/Metropolitan Open Land map for Barnet after the changes you have proposed are accepted. We would like to see 'urban greening' being adopted notably in Town Centres to hide some of the less attractive areas. For example, the M1 motorway bridge is an example of a really brutal civic infrastructure that dissects Mill Hill's Town Centre. A green wall would go some way to making the bridge less unsightly, and it would help improve air quality.	A Neighbourhood Plan could highlight in more detail such 'urban greening' measures. This would enable prioritisation of CIL receipts to invest in such improvements.	Yes
Former MHNF	Section 10.5	We also welcome appropriate encouragement for local people and landowners to grow more food in the spaces available. We think that the Council should drive an initiative for local energy generation as other Councils have done. For example, solar panels could be installed along major roads such as the M1 and A1 to generate electricity and reduce noise pollution. The Council could benefit from interest free loans available to public bodies for energy generation on public buildings such as schools, libraries etc. This would deliver a real reduction in heating/lighting costs, would reduce carbon footprint dramatically and would help with overall budget constraints.	These are innovative ideas that are best addressed in the Council's emerging Sustainability Strategy	No
Elizabeth Silver	Para 10.2.13	Replace "with any loss of trees....adequately compensated" With: "with any loss of trees... not to be compensated by paying a levy into a fund. Re- greening has to be done visibly, on the same site. The public should be able to verify that funds for re-greening are being used in the same time frame, in the area for which they were meant.	Policy ECC01 seeks to minimise Barnet's contribution to climate change through a range of measures. In instances where carbon targets for a development cannot be fully achieved, a financial contribution will be sought.	No
Finchley Society	Para 10.2.14	'all' in the last line seems overdoing it. Surely there should be a minimum size - excluding at least 'householder' ones.	This has been amended to refer to developments minor and greater in size.	Yes
Finchley Society	Para 10.2.2	This para should be stronger. 'will be required as appropriate to' instead of 'is encouraged to', and 'will be required to provide for the building to be' for 'should also consider how the building could be'.	Agreed.	Yes
Finchley Society	Para 10.2.8	This should be accepted in exceptional circumstances only. Developers are expected to meet zero reduction targets.	This statement is in accordance with London Plan net zero carbon policy	No
Environment Agency	Para 10.3.12	Barnet's main water courses are of fair to poor chemical quality according to the Environment Agency. The sentence above is inaccurate, and may be using out-of-date terminology. The Water Framework Directive ecological status data should be used to qualify the current condition of watercourses in Barnet. The three WFD designated river waterbodies (listed below) in Barnet are currently at 'moderate' ecological potential, with the aim to reach 'good' ecological potential by 2027. <ul style="list-style-type: none"> • Silk Stream and Edgware Brook (GB106039022970) • Dollis Brook and Upper Brent (GB106039022980) • Pymmes Brook upstream Salmon Brook confluence (GB106038027940) The WFD classification data takes into account biological quality, hydro morphology and chemical quality. The current status data is from 2016 but we are currently finalising the 2019 data. The Reasons for Not Achieving Good or RNAG are available via our Catchment Data Explorer website.	Agreed	Yes
Environment Agency	Para 10.3.13	could be improved by specifying the range of reasons the watercourses are currently unable to achieve good potential. For example, the reasons include polluted runoff from roads and urban areas, development encroaching onto river corridors, heavily modified channels and banks, obsolete weirs,	Agreed	Yes

		culverts, sewage outfalls or discharges, domestic plumbing misconnections, invasive species and water abstraction.		
Canal & River Trust	Para 10.3.15	Support the proposal to create a new strategic green chain and walking route from Edgware to the Welsh Harp	Support welcomed	No
Environment Agency	Para 10.3.16	We welcome para 10.3.16 where it recommends >10 width of buffer zone, however we think this standard should be included in Policy ECC02. We would recommend a caveat with regards to tall buildings that wider buffer zones may be required to mitigate for the impact of over-shadowing of the watercourse corridor where tall buildings are proposed. We would also recommend a stronger statement is made in reference to achieving buffer zones that any reduction in width from the 10 metres requirement would have to be fully justified. Where reduced buffer zones are proposed, additional measures to improve biodiversity proposed on-site such as green spaces, tree planting, sustainable drainage measures or off-site compensation will be required. We also welcome the reference to naturalising rivers e.g. removal of hard structures. We strongly recommend a sentence includes that the Environment Agency has identified WFD action measures for each WFD designated watercourse, and these are available on request. The Thames River Basin Management Plan (2015) should be referenced as the Plan setting out objectives to improve waterbodies.	Agreed	Yes
Environment Agency	Para 10.3.5	We recommend amending this paragraph to include 'groundwater' or 'groundwater aquifers' alongside the reference to watercourses, and in some places the two water systems are interlinked i.e. the watercourses are potentially in hydraulic continuity with the aquifers.	Agreed	Yes
Finchley Society	Para 10.5.10	The BPOSS may have used flawed methodology in identifying 'low quality/low value' sites. As result, assessment for alternative uses should be very cautious. For example, in Finchley, Windsor Open Space is categorised as 'Low/Low'. Yet this park is widely used and treasured by residents otherwise extremely short of green space. It is also on a major London walking path. The similar classification of Village Road Open Space is also wrong – it is at the heart of the Finchley Village Conservation Area. However, the policy of alternative use may be applicable to Church End Gardens ("Poor/Fair") which is underutilised and poorly located. This park could be sold for residential development with funds used for a similar amount of better located open land.	BPOSS forms part of the Local Plan Evidence Base and therefore will help in planning decision making as will other material considerations such as any re-assessment of a BPOSS site. The Council is intending to review the BPOSS and this review will feed into a future planning policy framework for Barnet.	No
Elizabeth Silver	Para 10.5.13	Insert: Accessibility enhancements should avoid pay-for activities (such as mini-golf or zip wires) and activities which increase concreted areas, such as BMX/ skate parks. Explanation: Pay-for and commercial activities discriminate against low-income groups and those who wish to enjoy unspoilt natural and semi-natural spaces.	The Council aims to provide a range of parks, open spaces and leisure facilities across the borough to suit the needs of all users. ECC04 seeks to optimise the benefits of open space and create more accessible green spaces through a range of measures.	No
Friends of Windsor Open Space	Para 10.5.13	My response to the draft plan is with huge concerns. I am highlighting the past experience and the future regarding 'joint usage' paths through 'The Loop' as mentioned in the new Draft Plan. The Draft Plan proposes cycle routes throughout the 'Loop.' (Now known as the Dollis Valley Green Walk). This 90 year old walk was created by a Finchley Councillor Alfred Pike who envisaged a Green Corridor throughout the Borough. It was called 'Brookside Walk' and was built mainly on the Finchley side up to Westbury Road. The Walk was undisturbed as a walk (uninterrupted for over 70 years) as such the footpaths were legally established as a 'right of way'. At present it is a predominantly pleasant 10 mile 'Wildlife Corridor.' This walk was originally intended for pedestrians not cyclists or horse riders. The Dollis Brook forms an important ecological corridor through Barnet, providing habitats for many plants and creatures. Its original Aim in 1992- as set out in a flyer to educate the public. It forms part of Barnet's network of waymarked paths. The Dollis Valley Green Walk is a walk suitable for a wide range of people, from families with children to the more energetic. Most of the route is moderately flat and surfaced and is suitable for wheelchairs and pushchairs. The Greenwalk is about 10 miles long and takes 5-6 hours to walk. It links areas of public, open space along the Dollis valley in a green chain, to provide a pleasant and quiet long distance walk between the Green belt and Hampstead Heath. The	This detailed response has unfortunately not highlighted the wording that caused such concern. There are four references to the Dollis Valley Green Walk (DVGW) in the Local Plan. The Local Plan nor the Long Term Transport Strategy has renamed the Walk as the Loop. The Plan does not cover issues such as management and maintenance of such routes. The London Loop is an idea of connecting a series of parks and open spaces that would form a loop around the borough, the DVGW would be part of this much like how the DVGW is made up of a number of parks and open spaces the loop would be made up of a	No

Walk was developed and implemented by the London Borough of Barnet in 1992 with help from Countryside Management service and grant aid from the Countryside Commission. It now forms part of the London Walking Forum's London Wide Network of walks and links the London Loop with the Capital Ring. It was established as a Walk and not as a cycle route. They were prohibited from use (with the aid of signposts) and still are in Windsor Open Space. The Proposed Plan- To remove the word 'Walk' from the Name and call it 'The Loop'. This bears no reference to its geographical origins or its original intended use as a walk. The walk already shares its route with the 'London Loop'. What benefit is there to rename- The DVGW other than to deliberately lose its function as a walk. The Ministry of Housing, Committees & Local Government have responsibility for the bye-laws covering pleasure grounds and open spaces and good rule and government. These relate in the main to the peaceful enjoyment of Parks and Open Spaces and the suppression of nuisances. This could be interpreted as cycling. The regulations do not give Councils powers to revoke bye-laws under an entirely local process. The regulations do not give local authorities the power to create new categories of bye- Laws. According to the local bye-laws cycling on a footpath constitutes 'Trespass'. In 2009 Barnet Officers ignored the uninterrupted rule of twenty years as a footpath and the existing bye-laws to create 'joint usage' paths along parts of the Dollis Valley Green Walk. It is the intention of the Draft Plan to continue to erode the status of the existing footpaths and extend the Walk/ Loop covering 17 miles without revoking the bye-laws. The London Borough of Barnet is failing to uphold the law with the implementation of these 'joint usage' paths. In 2009 The Mayor Boris Johnson brought in a policy to 'Help a London Park'. He offered £400,000 to the successful candidates. Only 10 parks would be selected on the basis of local votes secured by members of the public. We the Friends of Windsor Open Space canvassed and canvassed to secure enough votes to attempt to win. This was in order to repair the eroding footpaths in Windsor Open Space. To our surprise we actually won. We were selected to receive the money but we did not see a penny of it! Barnet Greenspaces Dept. was allocated the money and they 'double crossed' the local residents who had worked so hard to secure improvements to their footpaths. Barnet Officers with local Councillor Brian Coleman went to TFL and secured more grant money to add to the £400,000 to improve the footpaths by converting them into 'joint usage' paths. TfL gave more funding to Barnet on the proviso that the money was to create 'joint usage' paths instead of for repairing the existing footpaths. TFL are still supporting Barnet with funding to extend the 'Joint Usage' routes as set out in the new Development Plan. Barnet used the money for the entire length of the Dollis Valley Green Walk including building a 'joint usage' path for cycling. This was not what we the Friends had worked so hard for. Barnet Officers excluded us from the consultations as they had other plans and knew that we would be upset to learn that their intentions towards the repairs had changed dramatically! The paths are in an even worse state today! In 2009 Barnet repaired a small section of footpath at the two entrances/exits to Windsor Open Space. That was our reward. The Dollis Valley Green Walk This is a site of Borough Importance for nature conservation. Barnet failed to consult the public in 2009 when they changed the usage of the original footpaths to 'Joint Usage' along the route. Before 2009 there were no cycle routes throughout the Dollis Valley Green Walk. Cycle routes create noise and light pollution. They disturb wildlife and those pedestrians actually walking peacefully on the path. Cyclists do not belong on footpaths. They frighten the existing pedestrians. Barnet's new Draft Plan 2020 takes no consideration of the environment with these proposals. The Draft plan has no policy for policing or monitoring these routes. With the permitted use of e.bikes and scooters on the 'joint usage' paths it will simply be dangerous. This is a recipe for disaster. Who will protect the pedestrians from the cyclists? Barnet won't! These 'joint usage' paths will deter ordinary people with prams, wheelchairs, the disabled the elderly, the very young from taking a walk. They will become 'rat runs' for cyclists. Barnet built cycle routes on the roads. Where have they gone? What proposals are there to increase cycle routes throughout the roads in Barnet? Why are they being proposed throughout 'the Loop'? I surmise that the

number of parks and walks e.g. the Loop also proposes to connect into the Silkstream Valley which is connected through Silkstream Park, Montrose Playing Fields, Rushgrove and down into the Welsh Harp.

Barnet has specific bye-laws for no cycling and specific pathways and parks/open spaces are listed and designated where cycling is prohibited one such location is Windsor Open Space which is why any cyclists use the DVGW shared pathways and directed to on road routes as opposed to through the open space.

Any plans for the delivery of and previous delivery of shared use pathways has been and would be delivered in line with current guidelines, which would cover pathway widths, signage and calming measures.

		<p>London Borough Barnet with TFL thinks it is safer and cheaper for cyclists to cycle through wildlife corridors. They are indifferent to the rights of pedestrians and Global Warming/ Climate Change. Where are Pedestrian rights being upheld? Walking is the healthiest form of exercise and the least harmful to the environment. Has the council given any thought or regard to 'The Public Equality Sector Duty'? How will these 'joint usage' paths affect the public who are protected under the Equality Act? There are still key issues with the Dollis Brook itself not fully addressed in the Draft Plan.</p> <p>Footpath/Cycle path conflict with the river (Brooke farm & Riverside Park) The eroding river banks, the eroding foot paths, to deal with encroachment along the river banks. The Borough has a duty of care to comply with this under the Natural Environment Research Council Act and Water Framework Directive. Under the biodiversity duty, which is part of the Natural Environment and Rural Communities act, public authorities must show regard for conserving biodiversity in all their actions. The new Draft Plan falls well short of the Act by wishing to increase cycling throughout the 17 miles of wildlife corridor, which has Metropolitan Open Land status, part of the London Loop and is a site of Importance for nature Conservation. This would be severely compromised if 'joint usage paths' were to be approved for virtually 17 miles of the walk. There is no regard for the natural world or preservation apart from proposed wetlands. The remainder of the Walk/Loop will be diminished and gone forever. I live adjacent to The Windsor Open Space. There is no cycle path through it yet cyclists and motor cyclists ride through it with impunity. There are no officers to police the routes. No officers will be appointed to monitor the new route. Who will stop e. bikes when they use the cycle paths? The problem will manifest 'Tenfold' if this scheme is actually adopted: Where conflict between cyclists and pedestrians occurs, it is almost always due to cyclists being forced to use infrastructure which is not designed for them all. Please think about those of us who actually like to walk in peace and look at the wildlife and listen to the birdsong without having to worry about cyclists whizzing past on their bikes or having to get out of their way. It is well documented that walking amongst nature or 'forest bathing' is a wonderful way to de-stress and improve mental health. What Barnet is proposing with this new Draft Plan is detrimental to 'Well Being,' walkers and the environment. This cannot be right.</p>		
Natural England	Para 10.5.18	We note that the SSSI is mentioned under the name Welsh Harp SSSI. While we acknowledge this local name for the SSSI, please ensure that the official name, Brent Reservoir SSSI, is listed in the Local Plan in order for local residents to know which name to search for when looking up information on the SSSI.add Sites of Special Scientific Interest to Policy ECC06 – Biodiversity point a) alongside "protecting existing Sites of Importance for Nature Conservation".	Agree	Yes
Sport England	Para 10.5.9	Sport England objects to the standards approach advocated in para 10.5.9 when referring to the Open Space, Sports and Recreational Facilities Needs Assessment. The emerging Playing Pitch Strategy Refresh should set out what provision is required and where.	The Playing Pitch Strategy Update is nearing completion	No
Finchley Society	Para 10.6.2	Add a further paragraph: 'New developments should, without exception, employ green roof technology to provide new habitat and increase the possibility for biodiversity.'	Agreed. Reference added to CDH05	Yes
Finchley Society	Para 10.6.5	Priority should also be given to enhancing the Dollis Brook which is widely visited.	Agreed	Yes
Historic England	Policy ECC01	Historic England support measures to improve energy efficiency and climatic environmental conditions. We recommend that this policy makes reference to historic buildings which may require a different approach to adaptation. Standardised adaption measures can adversely affect historic fabric, the character and appearance of historic areas, and can reduce the environmental performance of historic buildings. However, at present the policy does not recognise the risks posed to the historic environment, and make no distinction between historic buildings and modern development.	Agreed – see revised text.	Yes
Historic England	Policy ECC01	The plan could recognise that the beneficial re-use of existing buildings is a sustainable approach in its own right.	Amend (see technical guidance) see above	Yes

Barnet Cycling Campaign	Policy ECC01	The planned boom in construction, to increase the population by 15.3%, will increase construction traffic and the associated roadworks will also cause congestion. The increased population living in these developments require extra services and online shopping deliveries, even if they don't own a car themselves. Some of the proposed sites involve building on green spaces (e.g. Danegrove, High Barnet station, Colindeep Lane, Finchley Central, Whalebones Park, Mill Hill East, Watchtower House & Kingdom Hall, Watford Way & Bunns Lane, Woodside Park Station West, Barnet Mortuary). The plan needs to show how losses of green space from these and other sites will be replaced. Dockless bikes, car share bays and electric vehicles are all needed for a low carbon future. Policy needs to be strengthened to show how the Local Plan helps to meet the target of net zero carbon dioxide, rather than simply minimising the effect of development on climate change. Policies and plans need to explain how Barnet and its partners will support carbon reduction by: making existing homes energy efficient; ensuring that Barnet has electric buses; creating new green spaces; speeding up the installation of solar panels; and supporting a dense network of zero-carbon shared mobility by 2024. Funding may be available from central government and The Mayor's Green New Deal for London. ULEZ for Barnet: Over 20% of all carbon emissions in London come from road transport. A target date is needed for the ULEZ to cover the entire borough. Enable cycling: To achieve a major shift to cycling, suitable for a zero-carbon Barnet, adopt strengthened policies for TRC01 – Sustainable and Active Travel.	These concerns are reflected throughout the development plan for Barnet which consists of the Local Plan and London Plan	No
Former MHNF	Policy ECC01	The Council will seek to minimise Barnet's contribution to climate change and ensure that through the efficient use of natural resources the borough develops in a way which respects environmental limits and improves quality of life. The Council could go further and the NPPF states (Para 170) "Development should, wherever possible, help to improve local environmental conditions such as air and water quality"	Improvements to air quality from development proposals is stated in Policy ECC02.	No
Finchley Society	Policy ECC01	ECC01h Add at end: householders undertaking refurbishment should demonstrate a significant improvement in energy performance ECC01a It is not clear how the concentration of growth in the Growth Areas will make it easier to manage impacts on climate. Centralising growth could increase car journeys (as people commute to centralised office locations), and may result in carbon-intensive construction of new or replacement buildings. The way in which the Council's preferred strategy addresses the climate emergency should be pointed out. ECC01 Mention the importance of preserving green cover in Barnet, particularly trees, to ensure that vegetation carbon stores are not depleted by development. Ideally every development should be required to increase the number of trees in Barnet, whether on site or in designated alternative locations.	Monitoring such improvements would be an onerous requirement for the Local Plan. It is the householders responsibility that energy performance is improved. In order to better manage the impacts of development on the climate growth is focused in specific locations.	Yes
Mayor of London	Policy ECC01	The Mayor welcomes Barnet's aim to minimise its contribution to climate change and improve air quality as set out in draft Local Plan Policies ECC01 and ECC02. He welcomes the reference to Intend to Publish London Plan Policies SI2 and SI3. The Mayor has produced numerous studies to support his zero-carbon target that are applicable to Barnet.	We welcome the support	No
Thames Water Utilities	Policy ECC02	Recommended that it would be clearer if the policy was separated for water and waste water infrastructure and should include: <i>"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development"</i> .	Agreed. Text revised.	Yes
East Finchley Community Trust	Policy ECC02	More detail on measures which could improve air quality - particular concerned that the lack of bus services leads to increased car usage.	Agreed. Text revised.	Yes

Elizabeth Silver	Policy ECC02	Add: to k) High carbon-emitters such as traditional energy generation, or any polluting form of energy generation should not be permitted in residential or Green Belt/Metropolitan Open Land locations.	Green Belt and MOL have some of the highest levels of policy protection from inappropriate uses	No
Sport England	Policy ECC02	Consider that the draft Plan should also make clear that the Agent of Change principle should extend further to recognise lighting and the risk of ball strike.	The Agent of Change principle is guided by the London Plan with regard to noise and other nuisance generating uses	No
Friends of Finchley Way Open Space	Policy ECC02	I support this policy. The draft plan acknowledges the numerous streams in the borough, many of which are underground. It is vital that the water table is considered in detail when giving planning permission for new developments, including for basements. We support the plan to open up rivers and to provide walking routes along rivers, while maintaining decent sized flood plains and rejecting building development in these areas.	This support is welcomed	No
Barratt London	Policy ECC02	Policy should include flexibility that this policy will apply where it does not prejudice other policies of the Regulation 18 Local Plan.	Where relevant to assessing an application, all policies in the plan need to be considered and tensions between different policies reconciled in reaching a balanced judgement	No
Environment Agency	Policy ECC02d	In general we support part (d) of the policy which requires an investigation to establish the level of contamination for proposals on land which may be contaminated. We suggest 'remediation' is specifically mentioned either in addition to, or instead of 'mitigation' as the clean-up (remediation) of contaminated land is required where identified.	Agreed	Yes
Environment Agency	Policy ECC02g	Part (g) should be reviewed in light of NPPF para 149 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, etc.' We agree development should demonstrate it will not cause harm or deterioration to the water environment, however, it should also consider how it can improve the water environment for the lifetime of development. Discussions with Thames Water and the Lead Local Flood Authority should also inform this policy. For example, proposals should ensure there is sufficient surface water and foul drainage treatment capacity to serve developments, facilitate the separation of surface and foul water systems. The provision and adoption of Sustainable Drainage Systems are essential to improve water quality as well as attenuating and slowing down run-off can alleviate pressure on the drainage network. The policy should require that where there are capacity issues in the drainage network that developers will demonstrate that the necessary upgrades will be provided in time for the development (or development will be refused). We recommend you refer to Policy DM 18 'On Site Management and Reuse of Waste Water and Water Supply' in Epping Forest's Local Plan submission version for an example of how water quality requirements have been included in policy. Policy DME1 10 Water Management, Efficiency and Quality in Hillingdon's Local Plan Part 2 (adopted January 2020) is also another good example of how this aspect has been addressed.	Agreed – new policy ECC02A	Yes
Environment Agency	Policy ECC02g	Policy on flood risk seems very general and doesn't add much value to what is already set out in the NPPF. It is not tailored to local circumstances for Barnet, or in the spirit of NPPF para 149. 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk...' We would be unable to support the policy section on flood risk in its current form. We would strongly recommend there is a separate flood risk or water management policy rather than this being combined into a general 'environmental considerations' policy. Given the level of growth required the policy leaves us with many questions, such as; <ul style="list-style-type: none"> • What is Barnet's approach on the provision and contribution to flood defences and flood alleviation scheme's to protect the borough's communities, e.g. the Silk Stream flood alleviation scheme? • How will Barnet's developments ensure communities are protected and resilient to the impacts from climate change on flood risk? There is currently no mention of climate change in relation to flood risk. 	Agreed – new policy ECC02A	Yes

		<ul style="list-style-type: none"> • How will windfall applications be treated that are proposed in areas at risk of flooding? Are there enough areas in the Borough in Flood Zone 1 (low risk) to comfortably accommodate windfall sites, without resorting to areas of Flood Zone 2/3 (medium and high risk) including climate change? • What is Barnet's approach to making space for water and ensure there is adequate space and flood storage areas for flood waters to go, for all sources of flood risk? What protections will flood storage areas/functional floodplain have in the Local Plan? • What is the approach for proposed development in areas of functional floodplain which are identified by the local authority in the SFRA? We recommend these are protected for flood storage within the Local Plan, rather than developed on (see our comments in relation to Watling car park and market). • How will Barnet work in partnership with other borough's that share the same river catchments to alleviate flood risk from river and surface water flooding? • How has this policy been informed by the West London SFRA policy recommendations? • How has this policy been informed by Barnet's Surface Water Management Plan (2011) and Flood Risk Management Strategy (2017). Should stronger requirements apply to Critical Drainage Areas as identified in the Surface Water Management Plan, e.g. can developments help deliver the retrofit of SuDS measures to alleviate current flood risk? <p>We think the policy needs to address these issues informed by the SFRA. The policy should require developments to contribute towards a positive reduction in flood risk, on and off site, wherever possible. The policy should also promote early discussions around flood risk to ensure that opportunities through the development are being maximised. The maintenance, replacement and repairing of flood defences should be delivered as part of developments wherever possible, particularly where developments are expected to directly benefit from such defences. We recommend you look at other draft Local Plan policies in London for best practice. For example, Barking and Dagenham's draft Local Plan Policy DM28 'Managing Flood Risk, Including Surface Water Management' includes requirements for flood defences and seeking opportunities to relocate existing development vulnerable to future flood risk due to climate change to more sustainable locations.</p>		
Environment Agency	Policy ECC02h	<p>We support (part h) where it refers to Table 20 and the requirement for new dwellings to be designed to ensure that a maximum of 105 litres of water is consumed per person per day. We would prefer if the policy itself stated the requirement rather than refer to Table 20. We would suggest developers submit a water efficiency calculator report, or equivalent information, at the planning stage to demonstrate compliance with this standard. Non-residential developments can also consume significant amounts of water. We recommend a policy requirement for commercial development is also included that new commercial buildings are required to achieve a BREEAM 'excellent' rating for water efficiency (or an equivalent rating with any successors). This is in line with Policy SI 5 Water Infrastructure of the London Plan (Intend to Publish version, 2019). Older buildings are often the least efficient in resource use. We recommend the policy supports retrofitting of existing buildings where opportunities arise through refurbishments and changes of use. There are a number of BREEAM Technical Standards documents to support retrofitting for commercial and residential buildings.</p>	Agreed. However we consider that making cross-reference to Tables is a more effective way of getting the message of policy across.	Yes
Environment Agency	Policy ECC02i	<p>We welcome part (i) though think the policy should be stronger to emphasise a firm expectation to naturalise rivers (including de-culverting) and incorporate buffer zones as part of developments. We are concerned that words such as 'wherever possible' and 'where appropriate' downplay the expectation and aim especially if these caveats are not fully explained in the supporting text. It would also be stronger by explicitly stating the buffer zone standard expected of developments adjacent to main rivers (as specified in paragraph 10.3.16 where it recommends >10 metres width of buffer zone), as this endorses it as a policy standard. We also recommend the policy states that buffer zones should include creation of wetland habitat and native planting and have a management plan to ensure long term biodiversity gains. Public accessibility is important but so is the need to create good</p>	Agreed – policy and supporting text revised.	Yes

		quality, well-connected habitat within the buffer for the benefit of wildlife. Although we support the last sentence that contributions towards river restoration and de-culverting will be expected the caveat 'where appropriate' should be expanded on in the supporting text. We would expect contributions for proposals that are unable to restore rivers or de-culvert due to significant physical constraints that can't be overcome such as safety risks or an increase in flood risk and these would need to be fully justified.		
Mayor of London	Policy ECC03	The Mayor welcomes the proposed Local Plan policies on sustainable waste management. The Local Plan should set out on a map which sites and areas in Barnet are to be safeguarded for waste as identified in the North London Waste Plan. In this regard, the safeguarding of all existing waste sites in Barnet is welcome as is the allocation of Scratchwood Quarry for continued and more intensive waste use.	Agreed. New map of safeguarded waste sites reflecting the (soon to be adopted) NLWP	Yes
Finchley Society	Policy ECC03	The Council should have a policy of strong enforcement of the laws against fly-tipping. Such crime can only be discouraged by active monitoring and prosecutions..	Flytipping is outside the remit of Local Plans. The Council's Environmental Health Service is responsible for dealing with incidents of flytipping.	No
LBB Haringey	Policy ECC03	Supports this policy and will continue to work with Barnet and other councils involved.	We welcome this support. This will be reflected in our Statement of Common Ground	No
Pinkham Way Alliance	Policy ECC03 & Section 10.4	Whilst honestly worded, fails to reflect the fact that the NLWP is outdated	NLWP is not outdated having been subject to Examination in late 2019. The Council awaits publication of the Inspector's Report.	No
Department of Education	Policy ECC04	e). In areas that have been assessed by the Barnet Parks and Open Spaces Strategy or a site specific assessment as being of low quality and low value the Council will consider limited development on open spaces. The Council will require any proposal that involves the loss of low quality and low value open space to robustly demonstrate that the following criteria can be satisfied: i. the development proposal is a small scale ancillary use which supports the improved use of the open space; and or ii. that opportunities to improve the quality and value of the existing space have been explored and subject to viability assessment; cannot be delivered to enhance the quality and value of the existing space; or iii. Equivalent or better quality open space provision can be delivered or iv. <u>The benefits of the new development outweigh the disbenefits of the loss of open space.</u>	ECC04 specifically relates to areas of open space across the borough that were considered as part of the BPOSS and where a judgement reached at the time that the study was undertaken that an area was of low quality and low value. BPOSS forms part of the Local Plan Evidence Base and therefore will help in planning decision making as will other material considerations such as any re-assessment of a BPOSS site.	No
Department of Education	Policy ECC04	Policy requires that new development that generates demand for new open spaces, new open space or payment in lieu will be required. This policy element - at parts b). i. and ii. - should not be required for the provision of community and social infrastructure as it could place additional burden on the provision of new school places both financially and in design terms.	Part b) of the policy refers to the requirement from all developments that create additional demand for open space where opportunities arise.	No
Elizabeth Silver	Policy ECC04	- a (i) add: Accessibility should not include developments that involve losing green space e.g. pay-for leisure activities. b(i) There is a risk that developments that create an additional demand for open space may claim exemption on cash-payments for off-site provision, or the off-site provision may be too far away to be useful, given that many spaces (eg sites 17,19,45) have been built on. What is the mechanism for enforcement of these measures? Relief on the Community Infrastructure Levy can be claimed where "the charging authority must consider that paying the full levy would have an unacceptable impact on the development's viability" https://www.gov.uk/guidance/community-infrastructure-levy#para076 b (iii) Folly Brook & Darlands Lake Nature Reserve are sites of Borough Importance (SBI) Grade I Burtonhole Lane & Pasture, SBI – Grade II and SINC's. e) Green spaces are sometimes left neglected/un-maintained and thus become low quality and low-value. That should not be a route to losing the green space. A better rule is to improve the quality of the space, in all cases. Maintenance of green spaces must include removal of litter & fly-tipping. eg in Copthall Railway Walk , Copthall Old Common, Mill Hill Old Railway Nature Reserves – all are full of litter originating from Allianz Park stadium and sports grounds.	The Council aims to provide a range of parks, open spaces and leisure facilities across the borough to suit the needs of all users. ECC04 seeks to optimise the benefits of open space and create more accessible green spaces through a range of measures.	No

Barnet Cycling Campaign	Policy ECC04	Policy lacks commitment to make parks and open spaces accessible by cycle or for cycling within them. Cycle routes to parks and between parks need to be provided and routes through parks and open spaces need upgrading with wider, hard surfaces that separate walkers from cyclists.	The Council is committed to improving cycle routes to and between parks. To reflect this expand reference to securing better access arrangements in part b of the policy.	Yes
Ramblers Association	Policy ECC04	Support Green Infrastructure Plan but to include emphasis on improving access to new Regional Park and Rights of Way Network. Part a)i should include improved rights of way access for walkers	The establishment of a Regional Park is at a very early stage. However it remains an ambition of the Council within the lifetime of the Local Plan.	No
New Barnet Community Association	Policy ECC04	Appears to be no challenge on the use of agricultural land, which could support the need for allotments. Need for clear assessment on what the Regional Park is aiming to achieve, including public access.	The establishment of a Regional Park is at a very early stage. However it remains an ambition of the Council within the lifetime of the Local Plan.	No
Sport England	Policy ECC04	As there is no reference to playing fields should be noted NPPF, para 97, does specifically seek to protect playing fields (not just pitches). Policy ECC04 E does allow losses when not viable but not being viable is not the same as strategically being identified as surplus. This should be amended.	The Open Space Strategy has provided an assessment of quality and value and on the basis that it is rated poor, there is an expectation that equivalent or better space will be delivered.	No
Department of Education	Policy ECC04	The policy does not allow for the loss of open space unless it has been previously assessed by the Barnet Parks and Open Spaces Strategy as being of low quality and low value. This is not considered to wholly accord with the draft London Plan and the NPPF.	The policy does not expressly state that loss of other open space will not be allowed if a compelling case for its loss can be made.	No
Friends of Finchley Way Open Space	Policy ECC04	Barnet is an outer London borough where the attractiveness of the borough is the quality of life reflected in both the access to central London for jobs, leisure and shopping and the easy access to formal and informal green spaces. The combination is what makes the borough such a major attraction for families. It is essential that Barnet commits funding and more personnel to support the maintenance of green spaces of all sizes. The physical and mental health benefits of walking and informal play should not be underestimated.	The public health benefits of such activities have been amply demonstrated through the COVID 19 lockdown	No
Pinkham Way Alliance	Policy ECC04	Welcomed positive tone of Council's Green Infrastructure SPD. Policy ECC04 c)i. should include Pinkham Way (as also included in GGA1 map.	A specific reference to Pinkham Way is not merited	No
Barnet Society	Policy ECC04 & Paras 10.5.10-12	The BPOSS assessment of open space quality and value produced some bizarre conclusions. Within the Chipping Barnet area alone, for example, spaces deemed 'low quality, low value' included Monken Hadley Common & Wood, Ravenscroft Gardens, Rowley Green Nature Reserve, King George V Playing Fields and Highlands Gardens (to name just some). Such a ranking would astonish the many who use and love them.	BPOSS forms part of the Local Plan Evidence Base and therefore will help in planning decision making as will other material considerations such as any re-assessment of a BPOSS site. The Council is intending to review the BPOSS and this review will feed into a future planning policy framework for Barnet.	No
Environment Agency	Policy ECC04b	We support part b (iii) where it references watercourses in terms of maintaining and improving the greening of the environment, and enabling green corridors. Many of the improvement actions identified for rivers in Barnet are within the parks and open spaces.	We welcome this support	No
Mayor of London	Policy ECC05	The Mayor welcomes the inclusion of the green grid approach to green infrastructure in the draft Local Plan and its aim to provide additional open space and enhance existing green and open space as well as biodiversity across the borough. Draft Local Plan Policy ECC05b on Metropolitan Open Land (MOL) should simply refer to the equivalent Intend to Publish London Plan Policy G3 or it needs to more closely align to the London Plan policy. In particular, Barnet's proposed policy on MOL policy should afford it the same status and protection as Green Belt. In this regard the Mayor strongly objects to the alterations to the MOL boundaries that release open green space from MOL protection as these areas to be released are still distinguishable from the built-up area and forms part of the open land, satisfying the MOL designation.	Agreed	Yes

Taylor Wimpey North Thames	Policy ECC05	To overcome this objection, Policy ECC05 should be revised to clarify that the provisions of Green Belt policy as referred to at criteria a)j will be applied equally to MOL and to set out consistent criteria against which proposals will be assessed.	Status of MOL has been clarified in Policy ECC05	Yes
Elizabeth Silver	Policy ECC05	Reword: <i>"The council's evidence (Barnet Green Belt and MOL Study 2019) does not support making the case needed to demonstrate that exceptional circumstances exist sufficiently to justify making revisions to the existing Green Belt/MOL boundaries."</i> To: "The council does not support revisions to existing boundaries of Green Belt and MOL by claiming exceptional circumstances." (Barnet Green Belt and MOL Study 2019)	ECC05 sets out criteria that must be considered for any development proposals that come forward on or adjacent to Green Belt / MOL.	No
Mayor of London	Policy ECC05	Should simply refer to Intend to Publish Policy G3, or more closely align. The Mayor strongly objects to the alterations to the MOL boundaries that release open green space from MOL protection as these areas to be released are still distinguishable from the built-up area and forms part of the open land, satisfying the MOL designation.	The Council considers it sensible to alter Green Belt and MOL boundaries in order to support the robustness of their designations and their practical application. The Green Belt Study highlighted at Map 25 that there is no practical benefit in the MOL boundary cutting through a building. At Map 26 the Study recommended this revision to align with the footpath while at Maps 36 and 37 it recommended a more rational and therefore stronger boundary for both areas.	No
Barnet Society	Policy ECC05	Under a) i add a reference to the Government's advice on the role of the Green Belt in the planning system published 22 July 2019.	Repeating and cross-referencing Government advice makes plan unnecessarily lengthy and easily become dated as policy advice and guidance evolves and changes over time.	No
Finchley Society	Policy ECC05	ECC05b 'inappropriate' should be defined or examples given to reduce argument, especially in appeals	The Government's definition of inappropriate development is set out within the NPPF.	No
Natural England	Policy ECC06	recommend strengthening wording to better reflect the concept of biodiversity net gain as an aim for all development. Wording could also reflect usage of the Biodiversity Metric 2.0.	Agree – text revised	Yes
Former MHNF	Policy ECC06	It should be strengthened to ensure that all development must contribute to a net gain in biodiversity – as per NPPF	Agree – text revised	Yes
Environment Agency	Policy ECC06	We would like ECC06 to require consistent management and control of non-native invasive species which will assist in the protection and enhancement of biodiversity through a long term management plan. Invasive species have been identified across Barnet as a contributing factor as to why the rivers are not able to achieve good ecological status or potential (see comments on Chapter 2).	Agreed. The need to manage invasive species is acknowledged in paras 10.12.5 and 10.24.8.	Yes
Finchley Society	Policy ECC06	Add 'h) all new flat rooftops should be provided as green roofs designed to support and enhance biodiversity.'	Specific reference to Green Roofs at CDH05	Yes
Pinkham Way Alliance	Policy ECC06	Approach to biodiversity is inadequate and fails to take latest guidance into account. ECC06 should include reference to Government's 25 year Environment Plan, IPBES, and RTPI's Rising to the Climate Crisis which contains important site selection criteria.	This section has been revised	yes
Environment Agency	Policy ECC06a	Part (a) of the policy should also include 'existing priority habitats and species according to the NERC 2006.' In addition to the London Wildlife Trust we recommend the Brent Catchment Partnership is included in part (a) as a key partner.	Agreed	yes
Environment Agency	Policy ECC06d	We recommend part (d) of this policy includes the requirement to achieve a biodiversity net gain rather than making 'the fullest contribution	Agreed.	Yes
Environment Agency	Policy ECC06f	We welcome part (f) but recommend floodplain habitat is also included, to read as follows: f) supporting opportunities that facilitate river and floodplain habitat restoration in particular for the River Brent, Silk Stream and Pymmes Brook (See Policy ECC02).	Agreed	Yes

		We consider the words 'if appropriate' are not needed in part (f), as suitable caveats are already expressed sufficiently within ECC02.		
Pinkham Way Alliance	Map 7	Error in Public Open Space Deficiency for Pinkham Way site (as had also been made in GI SPD) breaching Reg 9(1) of the Environmental Assessment of Plans or Programmes Regs 2004.	Further clarification on what this error is will be welcomed	Yes
Mayor of London	Table 16	Table 16 should be consistent with draft Local Plan policy TRC03, which states that electric points will be delivered in accordance with draft London Plan Standards – that is 20% active charging facilities with passive provision for all the remaining spaces.	Agreed. Table 16 revised	Yes
Finchley Society	Table 16	In Table 16 (third box down) the proportion of car parking spaces with provision for an electrical charging point (present or future) should be at least 3 in 5. The Government has committed the UK to cease sales of internal combustion vehicles by 2035. This Plan runs until then, and drivers will expect to be able to charge vehicles in most parking places. Encouragement of a switch to electric vehicles should be a part of the Council's climate change strategy.	Table 16 revised to be consistent with London Plan standards	Yes
Environment Agency	Table 19	1st row Proposed development will need to demonstrate application of the sequential test and exception test where inappropriate development is proposed in areas of flood risk. Development scale: Minor, Major and large scale Proposed development will need to demonstrate application of the sequential test and exception test where inappropriate development is proposed in areas of flood risk . Development scale: Minor, Major and large scale. NPPF para 164 states that applications for some minor development and changes of use should not be subject to the sequential or exceptions tests but still meet the requirements for site-specific flood risk assessments. - 2nd row Proposed development will need to provide a Flood Risk Assessment on the known flood risk potential from all sources of flooding including surface water ⁴⁸ to the planning application site, the risk to others, how it will be managed and taking cli-mate change into account. Development scale: All development over 1 hectare in Flood Zone 1 Development in Flood Zone 2 & 3 except for minor development. Even minor developments require some form of flood risk assessment proportionate to the minor scale and nature of the proposals. Even if the minor development doesn't meet the threshold to be reviewed by either the Environment Agency or the Lead Local Flood Authority, the guidance on https://www.gov.uk/guidance/flood-risk-assessment-standing-advice should be followed by both the applicant and local authority if the development is located within Flood Zone 2 or 3.	Agreed	Yes
Finchley Society	Table 19	2nd box. Where planning permission is required for hardsurfacing porous materials must [not 'should normally] be used. Hardsurfacing porous materials should be used whether planning permission is required or not. Admittedly, in the absence of a requirement for planning permission the Council cannot enforce this, but the text gives the impression that it does not matter.	Agreed	Yes
Thames Water Utilities	Table 19	Supportive of the inclusion of this table; however, would request that it should apply to minor, major and large scale (not just large schemes). Also suggest inclusion of the following text: <i>Thames Water encourages developers to use their free pre-planning service (https://www.thameswater.co.uk/preplanning). This service can tell developers at an early stage if there will be capacity in Thames water and/or wastewater networks to serve their development, or what they will do if there is not. The developer can then submit this communication as evidence to support a planning application and Thames can prepare to serve the new development at the point of need, helping avoid delays to housing deliver programmes.</i>	Table 19 revised.	Yes
Thames Water Utilities	Table 20	Supports this requirement for all new dwellings.	We welcome the support.	No
West Finchley Residents Association	Chapter 11	Limitations of public transport should be noted (growth assumes public transport support) and bus network should be improved, to improve access and congestion on roads.	As evidenced by the Long Term Transport Strategy the Council is working with TfL on improving the local bus network, recognising the impact of congestion on bus services.	No

Brent Cross South Partnership	Chapter 11	Orbital bus speeds are identified as a limiting factor in moving people around the borough although there do not appear to be proposals to alleviate this. Further clarity is required on how this strategic issue may be mitigated. We support the priority given to encouraging forms of active and sustainable travel.	The improvement of orbital travel for Barnet is a focus of the Barnet Long Term Transport Strategy (LTTS). The document provides detail on the options for orbital travel including improving the speed of the bus network through bus prioritisation initiatives and rapid transit buses; and improvements to the cycle network.	No
Brent Cross South Partnership	Chapter 11	One of the key transport issues facing transport systems and new development is that of servicing and freight activity. TfL's Freight & Servicing Action Plan (March 2019) identifies that around one fifth of road traffic in London comprises lorries and vans, with HGVs involved in 63% of fatal cyclist collisions and 25% of fatal pedestrian collisions, despite only making up 4% of overall miles driven in the capital. It is considered that this is an important element not given suitable attention within the Draft Local Plan, with a range of measures possible for inclusion to promote more sustainable delivery options, particularly given the increasing role of online shopping for residents and businesses. Clarity is needed on the approach for freight and servicing on the highway network within the Borough.	This issue is more appropriately considered as part of a Boroughwide Transport Strategy. The Local Plan supports Freight Quality Partnerships and the Council would welcome working with partners to deliver sustainable freight and servicing for the Borough.	No
Verena Donig	Chapter 11	Need for wider bus links, particularly east/west links across the Borough. Further parking restrictions or priority for buses could be implemented to help speed of bus travel/ease stoppages.	The improvement of orbital travel for Barnet is a focus of the LTTS. The document provides detail on the options for orbital travel including improving the speed of the bus network through bus prioritisation initiatives and rapid transit buses; and improvements to the cycle network.	No
Federation of Residents Associations in Barnet (FORAB)	Chapter 11	Transport. This whole area is most troubling. The dependence on the two branches of the Northern Line for travel to work is acknowledged as is the reality that these lines are currently overloaded. Whilst some capacity increase is possible, which will include the necessitate for rebuilding at Camden Town, financial constraints indicate it is likely to be many years before plans come to fruition. Even worse is the prospect that with a change in emphasis by the Govt to HS2 and transport infrastructure in the north, there is considerable doubt whether Crossrail 2 and WLO will ever see the light of day, and certainly they would not arrive before the timescale of much of the planned additional housing. Though orbital services bus links are a legitimate concern we doubt they are anything other than marginal in the overall picture and any improvements will only have limited impact. More important is finding ways to reduce bus travels times, the decline of which is cited as a major reason for the fall in bus usage. So the notion of major improvements to public transport in the Borough is little more than fanciful and the Plan should reflect the impact of this reality rather than dwell on aspiration. And linked to this, it is evident the plan is very weak on curbing car usage where much more imaginative solutions are needed e.g some form of road pricing, particularly vehicles entering the Borough from the motorways to the north. We do however support ideas such as priority for buses, banning parking close to schools and to increase 20mph zones.	Reducing dependency on the car is an important objective for this Local Plan. The Barnet Long Term Transport Strategy sets out several initiatives with the potential to reduce car usage while Local Plan policies encourage more sustainable modes of travel and seek to reduce land allocated to car parking. The Local Plan is not capable of introducing road user charging.	Yes
Former MHNF	Chapter 11	We agree with your general comment that radial links into Central London are good if often extremely overcrowded, and they are still not accessible for all at many stations. We now have Step-Free Access at Mill Hill East and await its delivery at Mill Hill Broadway following the grant of funding from the Department of Transport.	The improvement of orbital travel for Barnet is a focus of the LTTS. The document provides detail on the options for orbital travel including improving the speed of the bus network through bus prioritisation initiatives and rapid transit buses; and improvements to the cycle network.	No
East Finchley Community Trust	Chapter 11	Requests plan includes detailed proposal about enhancing public transport connectivity in the East Finchley ward.	See previous response on Long Term Transport Strategy and improving orbital travel	No
Good.neighbours@yahoo.co.uk	Chapter 11	Can you please address transport to our hospitals. I work with elderly and buses to Chase Farm, Finchley Memorial and Barnet from Mill Hill do not exist.	See previous response on Long Term Transport Strategy and improving orbital travel	No

Friends of Finchley Way Open Space	Chapter 11	Support the car parking space per housing unit proposed in the Plan. It is clear from the PTAL scores for most of the borough that there is currently insufficient public transport access to significantly reduce car usage at this time. There is a conflict between Healthy Streets and an aging population in what is a relatively hilly part of London. This needs better thought than the Plan has given it at present. Not everyone who is 'older' is disabled or needs care. Too often there is a clean break made between people who are disabled and people who are able bodied. In reality many older people and those with chronic illnesses fall somewhere in between and the transport system does not seem to cater for this group.	Policy TRC03 is a bespoke parking management policy for Barnet. We consider that it provides travel mode options for new residents.	No
Friends of Finchley Way Open Space	Chapter 11	I support the Plan in trying to navigate a way between a carless society being promoted by the Mayor of London and the realism that Barnet is a large outer borough with limited access to transport in many places. It is a realistic assumption that many, if not most, residents will continue to have cars for some years to come.	The Council welcomes this support	No
Former MHNF	Chapter 11	Orbital journeys across Barnet to other parts of North, East & West London are however most difficult and time consuming in the extreme. We have referred to this in detail earlier. The result is a high number of journeys by private car. This will not change materially in the life-time of this plan. This also affects productivity.	See previous response on Long Term Transport Strategy and improving orbital travel	No
East Finchley Community Trust	Chapter 11	Concerns about the capacity of local infrastructure already showing signs of strain and envisage increased pressure as the population grows. No details given in plan on how the High Barnet branch of the Northern Line will cope with increased population north of East Finchley and the anticipated local growth. Request the plan includes a clear strategy for revitalising East Finchley town centre. Plan claims the borough is well served by public transport including bus routes, however the High Road N2 has only one bus route (North to South) and already very significant queues for the 263 at peak times. Requests more detail about how bus capacity can be enhanced to meet existing and projected need. Lack of public transport to Finchley Memorial hospital - hopper bus facility is required to integrate this important facility into the local environment. Requests plan to include some specific detail about how Finchley Central Hospital could be better connected to its catchment area. Requests details on how the borough proposes to work with Transport for London on developing a new bus service between East Finchley and the Royal Free Hospital that would also better connect local residents to the green space of Hampstead Heath which is an important consideration as our ward is identified as having poor access to green space within the ward boundary.	See previous response to FORAB	No
Brent Cross South Partnership	Chapter 11	We support the recognition that sustainable and active modes of travel are key, but suggest that they should be further promoted. We note also that the draft Transport Strategy is currently out for consultation which will help to inform the development of the Plan moving forward. We are considering the content of the draft Strategy and may make representations on that document in due course.	The Local Plan has been updated to reflect the progress of the Long Term Transport Strategy	yes
Ivor Hall	Chapter 11	Might it be possible to resolve the present problems of traffic movement at the bottom end of Northway. For some reason parking has now been allowed from the bridge to the traffic lights on the Market Place. Hold-ups continue, including for the H2 Bus, I was in one last Saturday. Today, as clear as you like it!!! Oh dear!. A Few years ago my Wife witnessed an accident on the North side of the junction of WW and Temple Fortune Hill (TFH) where a cyclist travelling North ended up on the bonnet of a car travelling South. Starting at the South junction with Hampstead Way (HW) WW continues the same 30mph restriction until it reaches the junction between WW and TFH. I find that visibility is poor from when I drive up TFH wanting to cross to the higher part of TFH and many vehicles at this junction are travelling along WW from the South are moving at 30mph. There are also quite a few Pedestrians wanting to do the same. The 20 mph signs on the North of this junction are not that visible to these motorists and cars seem to be parking too close to the junction on that side. Why not start the 20mph limit at the South end of WW?.	This detailed matter is beyond the remit of the Local Plan and is best addressed directly with the Council's Highways Service who have been informed about this issue.	No

Sport England	Chapter 11	Active travel is the most common form of activity for the population to become, and remain, active so this is supported by Sport England.	We welcome the support.	No
Barnet Society	Section 11	Regret there is no mention of transport innovations such as affordable very rapid transit (AVRT).	The plan should only reference proposals that stand a realistic chance of coming forward during its lifetime.	No
Finchley Society	Section 11.3	The lack of orbital public transport is indeed a major impediment to the success of the strategy in this Plan. But this chapter is far too optimistic about the delivery in the Plan period of either the West London Orbital (a misnomer for a line that would go no further east than Cricklewood or Hendon) or Crossrail2, which would go no further west than New Southgate. More realistic redrafting needed.	Local Plan has been updated to reflect timescales for delivery of these 2 projects	Yes
Finchley Society	Section 11.4	This whole section is too bland. Plan must admit somewhere and discuss how the increase in population envisaged will have serious effects on the burden on all transport networks - rail, bus, road.	This is more of a matter for the Long Term Transport Strategy. References have been updated with regard to the Transport Strategy	Yes
St William Homes LLP	Section 11.6	Parking standards as set out in Chapter 11 will need to reflect those set out in the London Plan; specifically, standards set out in Policy T6 'Car Parking' seem excessive and at this stage, these are unjustified. These will need to be revised as the Plan is taken forward.	Barnet's car parking study and update provides an evidence based review of residential parking standards	No
Ivor Hall	Section 11.6	I was in touch with you hoping that at the time of the recent extension to the CPZ in part of Erskine Hill (EH) could have been extended along Erskine Hill Northwards to at least Asmunds Hill (AH). You were unable to do this. I live in EH between Temple Fortune Hill (TFH) and (AH) which has some 60 properties fronting onto that section. In addition there are two cul-de-sacs with some 22 properties whose overflow of cars park in this section of EH. We further have the H2 Bus which feeds into Golders Green Station before it turns left into AH which is a part of the existing HGS CPZ. We are therefore vulnerable to the parking by commuters who go forward into Central London. Could you consider consulting the residents of these areas to the making of this section of EH a CPZ zone or even the whole of the North (artisan) quarter of HGS.?.	Local Plans are not the mechanism for introducing CPZs. Chapter 11 clarifies how a CPZ can come forward Controlled parking zone added to the Glossary	Yes
Finchley Society	Section 11.6	There should be some cross-referencing between this section and the Schedule of Site Proposals. Many of the items in that schedule refer to the possible redevelopment of car parks, yet there is no strategy to which these discrete items are related	The Local Plan approach on the redevelopment of underutilised car parks is set out at GSS12	No
Finchley Society	Para 11.1.1	Add 'and acted upon' after 'Specific National and London Plan Policies to be taken into account'	The implication from the wording is that they will be acted upon	No
Barnet Cycling Campaign	Para 11.1.1	Specific National and London Plan Policies to be taken into account ADD - and acted upon. .Please make sure that active travel is always emphasised: Barnet Council will have to make a considerable step change in provision for active travel, cycling & walking where there have been decades of under investment and lack of maintenance. A street can move far more pedestrians, cyclists and bus passengers per hour than it can people in cars. We have to recognise that it is ridiculous to prioritise the least efficient means of moving people and the most damaging form of movement. Parked cars and heavy traffic both have a huge impact on the efficiency and safety of active travel.	There is much greater emphasis on promoting active travel in the Reg 19	Yes
Finchley Society	Para 11.2.1	We endorse the introductory statement and strongly support the investment in orbital links with priority given to active travel. We firmly agree with the statement from the draft London Plan '10.1.4 Rebalancing the transport system towards walking, cycling and public transport, including ensuring high quality interchanges, will require sustained investment including street environments to make walking and cycling safer and more attractive, and providing more, better quality public transport services to ensure that alternatives to the car are accessible, affordable and appealing.' This is the essence of what must be achieved to make a habitable city. Active travel should always be emphasised	The Council welcomes this support	No
Barnet Cycling Campaign	Para 11.2.1	Endorse this introductory statement and strongly support the investment in orbital links with priority given to active travel.	The Council welcomes this support	No
TfL	Para 11.3.2	We note that this paragraph states that 'few stations currently benefit from Step Free Access.' However, of the 13 Northern line stations in Barnet, seven currently offer step-free access. There are currently plans to make improvements at four other stations to provide step free access: Brent Cross, Colindale,	Text has been updated to reflect progress on Step Free Access.	Yes

		Burnt Oak, and Mill Hill East. This represents a higher than average number of stations with step free access compared to other parts of London. A new station will also be delivered at Brent Cross West, which will offer step-free access and improve public transport connectivity in the south west of the borough.		
Finchley Society	Para 11.3.3	This analysis highlights the need for improvements to the bus network, which has to be addressed 2020-2025 as a matter of urgency in order to redress the current situation and safeguard the future of the bus sector.	This section has been updated to reflect the Long Term Transport Strategy	Yes
Barnet Cycling Campaign	Para 11.3.3	Improvements to the bus network need to be addressed 2020-2025 as a matter of urgency in order to redress the current situation and safeguard the future of the bus sector.	This section has been updated to reflect the Long Term Transport Strategy	Yes
Barnet Cycling Campaign	Para 11.3.4	For Barnet to achieve a reduction in dependence on private vehicles orbital travel needs to be radically improved. ADD -by investment in public transport, walking and cycling.	Agree.	Yes
Finchley Society	Para 11.3.4	After 'For Barnet to achieve a reduction in dependence on private vehicles orbital travel needs to be radically improved' add 'by investment in public transport, walking and cycling'.	Agree	Yes
Geoffrey Silver	Para 11.3.5	Having all seats taken in trains leaving the Mill Hill East terminus in the morning rush hour is a symptom of overcrowding, which needs to be addressed by more frequent trains.	Mitigating problems with overcrowding is considered through the IDP, Long Term Transport Strategy and Strategic Transport Assessment	No
Former MHNF	Para 11.3.5	We do not believe that splitting the Northern Line at Camden Town, so that Barnet branch trains go only via Bank, and Edgware branch trains go only via Charing X is desirable. This would be a great inconvenience for Barnet residents who need the alternate routing as it is currently provided.	This is a matter for Transport for London	No
TfL	Para 11.3.5	We note the Council's point about crowding and capacity on the Northern line and welcome further discussion on the issue in parallel with their long-term transport strategy. We would also welcome these discussions covering station capacity as well, as development near stations in London can often present crowding challenges. Crowding can also occur at gatelines, within the station building, on platforms, and/or on trains. We expect new developments that are near/impact on stations to contribute towards station improvements where identified, and urge the Council to support these improvements to ensure that applicants contribute fairly and appropriately.	We welcome the opportunity to have further engagement on crowding and capacity of the Northern Line in parallel with the Long Term Transport Strategy	No
TfL	Para 11.3.6	We support the Council's ambition to create new or extended bus services, both delivered through new development and as part of our continuous review of the bus network to respond to changing circumstances, including growth. We also urge the Council to ensure every opportunity to work with developers to deliver improvements in the form of provision of bus priority is taken. It is also important to consider other elements of the bus service (such as adequate provision of bus stations, bus garages, bus stands, and driver facilities) and while these are not sufficient by themselves to provide greater alternatives to car travel, they will be necessary and it is important development plays its role in supporting enhanced facilities.	Welcome these comments of support.	No
TfL	Para 11.3.7	Please amend the text to show that the upgrade to Colindale station is expected to be part-funded by contributions from all development within walking distance of the station, in addition to part-funding by the Peel Centre contributions, Barnet Council, and Transport for London.	Agreed. Text revised.	Yes
Finchley Society	Para 11.4.10	After 'It will also take positive action to prevent any pupil parking, promoting car sharing,' add 'providing safe cycle routes' before 'and improved cycle parking facilities . . '	Agreed	Yes
Former MHNF	Para 11.4.10	In our experience school travel plans are developed but rarely adhered to. The Council needs to be far more pro-active in enforcing the plans and reducing car journeys for drop-off and collection of children. Perhaps electric school buses could be introduced with then zero tolerance for parents using their own vehicles, unless on proven medical grounds.	The monitoring of School Travel Plans still form an important role for the Council's Safe and Sustainable Travel Team	No
Barnet Cycling Campaign	Para 11.4.10	It will also take positive action to prevent any pupil parking, promoting car sharing,... ADD and relaxing school uniform rules... It will play its part by providing safe cycle routes, providing 'school streets', Low Traffic Neighbourhoods and 20 mph speed limits to enable more children to walk and cycle to school safely.	Wearing of uniform and school policies in this regard is beyond the remit of the Local Plan and therefore not a matter that it can directly influence.	No

Barnet Cycling Campaign	Para 11.4.12	...and by comprehensively tackling the school run. ADD , ensuring that school travel plans include ambitious targets for walking and cycling.	Agreed	Yes
Finchley Society	Para 11.4.12	The aim of 'comprehensively tackling the school run' is welcome, but is not followed by any proposals. This is a major issue if car traffic is to be reduced and the Council must have concrete actions and specific policies to address it. One possibility would be to require all private schools to offer a comprehensive private hired bus service to take pupils to and from their homes without charge (the aggregate costs to be recouped from school fees). Similar policies are also needed for state schools.	Revised to ensure that school travel plans include ambitious targets for walking and cycling.	Yes
Finchley Society	Para 11.4.14	Are there any Freight Quality Partnerships in Barnet?	There are no Freight Quality Partnerships in Barnet.	No
Barnet Society	Para 11.4.3	Recognition should be made of the likely growth of e-cycling, which overcomes Barnet's topographical challenges.	Agreed	Yes
Finchley Society	Para 11.4.3	This paragraph should recognise that the low take-up is also associated with an often hostile road environment exacerbated by a serious lack of infrastructure due historically to lack of action by Barnet Council to encourage cycling. For those people whom the topography has put off cycling, the rapid increased take-up of e-bikes will mitigate any apparent disadvantage. The low take-up of cycling in Barnet is primarily associated with serious lack of infrastructure and a hostile road environment exacerbated by lack of action by council. For those who have been put off cycling due to hills, the rapid increase in take-up of e-bikes will mitigate any apparent disadvantage....The Barnet LIP strongly supports the delivery of attractive and accessible cycle links especially in development areas ADD - and connecting to those developments.	Text revised to reflect Long Term Transport Strategy and provisions for cycling	Yes
Finchley Society	Para 11.4.7	This paragraph is strangely limited in its aspiration. Improving air quality near schools is indeed vital but the paragraph should also explain how the Council intend to improve air quality in general outside the North Circular Road.	Links are made throughout the Local Plan to the Council's Air Quality Action Plan	No
Barnet Cycling Campaign	Para 11.4.7	Air pollution is thought to have caused 64,000 deaths in the UK in 2015, including 17,000 fatal cases of heart and artery disease. Improving air quality near schools is vital but how does the council intend to improve air quality in general outside the NCR?	Links are made throughout the Local Plan to the Council's Air Quality Action Plan	No
Finchley Society	Para 11.4.9	After 'The Council will seek to ensure that any new transport interchanges are designed' add 'and improvements to existing interchanges made' before 'to help address personal safety issues and . . .'	Agreed	Yes
Barnet Cycling Campaign	Para 11.4.9	The Council will seek to ensure that any new transport interchanges are designed ADD - and improvements to existing interchanges made - to help address personal safety issues and reflect Secured by Design.	Agreed	Yes
Brent Cross South Partnership (DP9)	Para 11.5.10	We support the recognition of the benefits of electric vehicles, however, clarity is required regarding "a proportion" of car parking spaces with electric vehicle charging infrastructure, for example, that it should follow standards in the draft London Plan.	Support welcomed	No
Finchley Society	Para 11.5.11	The last sentence is welcomed. But, more priority for cycling on main roads positively slows buses. Very sophisticated highway engineering is required.. This paragraph - and the Plan as a whole (see 11.6.8, Policies GSS11, TRC02iii and TRC03f, and Table 16) woefully underestimates the need over the Plan period to provide charging points if the Government's policy (no new non-electric vehicles after 2032) is achieved. Before the next draft there must be a section covering this.	Speed of buses is an issue addressed through the Long Term Transport Strategy. Table 16 revised to be in accordance with London Plan Standards – that is 20% active charging facilities with passive provision for all the remaining spaces.	Yes
TfL	Para 11.5.11	We welcome the Council's ambition to minimise transport related carbon emissions. While we welcome a switch to electric vehicles to support this, it should be noted that mode shift away from car travel has the potential to secure reductions in carbon emissions more quickly and with wider benefits such as less congestion.	With high levels of car dependency in the Borough we support a more gradual modal shift that includes use of electric vehicles in line with provisions within the London Plan.	No
TfL	Para 11.5.12	We commend the Council's commitment to ensuring that opportunities to provide public transport operations facilities such as depots, interchanges and bus standing areas will be sought through development proposals. This should be strengthened through including the text within Policy TRC02 or	Agreed	Yes

		other appropriate policy. It is also important that existing operational facilities are protected and enhanced as part of development proposals where appropriate.		
Former MHNF	Para 11.5.3	Construction Management plans must not allow construction traffic to pass through Conservation areas except in very special circumstances.	This is a consideration in a Construction Management Plan	No
Brent Cross South Partnership (DP9)	Para 11.5.6	Specific discussion is incorporated regarding transport infrastructure improvements to be made within the Brent Cross Growth Area. This is noted and welcomed.	Support welcomed	No
TfL	Para 11.5.6	In line with the Mayor's Transport Strategy, interchanges should prioritise onward travel by active modes, followed by other sustainable transport modes. We urge the Council to include a policy commitment to reduce car dominance in and around stations, including though supporting reduced parking, implementing or expanding parking controls and enhancing the public realm around stations to prioritise people walking and cycling.	The Council has indicated its support for active travel and sustainable transport as well as proposing to develop car parking space at stations as part of its approach to reduce car dependency.	No
Brent Cross South Partnership (DP9)	Para 11.5.8	The paragraph states that "The Brent Cross Growth Area will benefit from new and enhanced bus services including...a bus-based rapid transit system." There is no evidence that a bus-based rapid transit system could be installed within the existing highway network, nor is there a funding strategy to deliver it: reference should be removed.	The bus based rapid transit system no longer forms part of the transport improvements for Brent Cross	No
Wade Miller-Knight	Para 11.5.8	Mention of bus-based rapid transit system not detailed any further?	See response above	No
TfL	Para 11.5.8	Would welcome more clarity on what is meant by the 'bus-based rapid transit system' that the Brent Cross Area will benefit from.	See response above	No
TfL	Para 11.6	We commend the Council on the considerable progress they have made on developing car parking standards that will make growth in the borough more sustainable, taking into account the extent of alternatives in different locations. However, we do have concerns regarding the approach at PTAL 5. A provision as high as 0.5 spaces per dwelling represents a level that is significantly higher than the Intend-to-Publish London Plan and something we would object to in principle. We also have concerns about how this 0.5 spaces provision would be justified, linking this to pre-existing controlled parking zones (CPZs) and 'orbital PTAL'. On the former, while we do not have recent CPZ information for Barnet, our understanding is that CPZs cover at least a significant majority of PTAL 5 areas in the borough. If there are areas of development in current or future PTAL 5 that are not currently covered by an existing CPZ, then these should be the prime candidates for CPZ expansion given the extent of alternatives. On the latter, we have significant concerns about the use of 'orbital PTAL'. This is not a robust, objective measure that could be open to inconsistencies and challenge. Our understanding of the proposed measure is bus routes are subjectively excluded based on the angle at which they operate, on the basis that 'radial' bus routes travel towards central London. However, just 4 per cent of Barnet residents' bus trips are to central London,1 while 90 per cent stay in outer London, demonstrating that buses are predominantly used for more local trips, regardless of the direction of travel. On this evidence, PTAL is a robust measure on which to assess connectivity in Barnet, as it is based on the public transport residents actually use. We do however appreciate the desire to complement PTAL, which is why we developed the Travel Time Mapping (TIM) tool, which is available on our WebCAT website2 alongside PTAL. We request that all reference to 'orbital PTAL' is removed, but would be happy for the reference in paragraph 10.6.2 to be replaced by a reference to TIM. We would also be happy to discuss further if we can help develop a more rounded but evidenced-based assessment of connectivity in the borough. Table 23 also does not differentiate areas other than by PTAL. The Intend-to-Publish London Plan requires Metropolitan and Major town centres to be car-free, and for development in outer London Opportunity Areas to have no more than 0.5 spaces per dwelling on average (apart from where more restrictive standards apply). We request that Table 23 is brought in line with this. We also note that the standards in Table 23 set higher maximum standards for larger	Barnet's Car Parking Study and Update sets out the evidence to justify this policy, helping to understand the pattern between property size and PTAL including orbital PTAL in the Borough.	No

		units in most areas. While the Intend-to-Publish London Plan does not differentiate standards based on unit size, we do not object to Barnet doing so in principle, providing that overall provision is within the London Plan standards. We welcome the commitment to the draft London Plan cycle parking standards and would welcome a reference to the London Cycling Design Standards (LCDS) to ensure the right quality as well as the right quantity of parking. We note the requirement for car club parking and membership – car clubs should ideally be used to reduce the levels of parking for privately owned cars, with total provision within the London Plan maximum standards (i.e. car club spaces count towards the maximum allowed).		
Finchley Society	Para 11.6.2	This should recognise that car clubs are more relevant in areas where public transport is poor.	They are more relevant in areas of greater population density	No
Brent Cross South Partnership (DP9)	Para 11.6.3	An extensive car parking study has been provided as part of the evidence base for the Draft Local Plan. This has been reviewed and the level of information set out within the study is welcomed. For non-residential land uses, the Council proposes to refer to standards stipulated within the draft London Plan. However, for residential use, the Council is looking to move away from the direction of the London Plan to allow flexibility in parking provision depending on local development characteristics. Such an approach is welcomed and considered suitable for Barnet, given the varied differences in locations, accessibility and development proposals across the borough. Paragraph 11.6.3 notes “appropriate” levels of parking for disabled people should be provided in all developments; it is considered that further clarity on what constitutes “appropriate” levels should be set out in this paragraph.	This support is welcomed. Policy TRC03 states that provision should be in accordance with the London Plan. Text has been revised to clarify.	Yes
TfL	Paras 11.3.1-4	We welcome the section explaining the current public transport network in Barnet. While overall the section is an accurate reflection of the current situation, there are several points where we would urge greater nuance. Firstly, it should be noted Barnet’s pattern of development along radial rail corridors means that most origins and destinations within the borough also follow that pattern. This means that while the rail networks serve central London, they also serve local destinations as well, such as the local town centre. This is supported by the fact that just 31 per cent of Barnet resident trips on London Underground are to central London, while slightly over half (52 per cent) are to destinations in outer London. Neither travel demand nor the bus network can be neatly divided into trips that are purely ‘radial’ or purely ‘orbital’ and it is important that plans for public transport in Barnet consider where travel is being generated from and attracted to in the round and look to provide the connections that support the greatest number of people. However, the section rightly identifies the challenges of the bus network faces today, both relating to congestion and to the need to improve key connections to provide a wider range of people with a genuine alternative. The advantage of the bus network is its flexibility, and we would welcome further discussion on how best to provide faster, more reliable journeys in a way that better competes with the car (although not purely on journey time, as the whole journey experience is important). These options could include bus priority on key corridors (such as bus lanes, bus priority at junctions, or enhanced bus stops with a larger bus cage to reduce boarding and alighting times, potentially supported by developer contributions) and, as suggested by the following section, changes to existing services or testing different types of service, such as limited-stop routes. Discouraging unnecessary car journeys at the same time as improving services will also be important to support the business case for such improvements. We acknowledge that developing these elements together can be a challenge, but it is one that we are keen to support the Council through.	We welcome the comment and will continue to engage with TfL on assessing and meeting transport demands in the Borough. This section has been updated to reflect the Long Term Transport Strategy and Strategic Transport Assessment.	Yes
Barnet Cycling Campaign	Policy TRC01	While “attractive and accessible cycle links especially in development areas” and “good quality walking surfaces and off-road cycle routes” and adoption of the Healthy Streets approach are all welcome, these should not be confined to development areas.	Agreed	Yes
TfL (CD)	Policy TRC01	This policy should specifically highlight active travel as the mode of transport with the lowest environmental impacts and the highest health benefits.	Agreed	Yes

Barnet Cycling Campaign	Policy TRC01	The thrust of this policy is to minimise the adverse effects of development. By saying the Council will “Refuse proposals that have an unacceptable impact on highway safety or a severe impact on the road network” without defining ‘unacceptable’ and ‘severe’, it is actually saying that some impact on highway safety and congestion is acceptable (contravening CHW04 and ECC01).	Agreed that to enable effective and consistent implementation of policy it is important to indicate what the council considers to be ‘unacceptable’ and ‘severe’.	Yes
Barnet Cycling Campaign	Policy TRC01	These improvements will have very little impact on modal shift away from private car use unless they are accompanied by further measures in this policy that make active travel safer, easier and cheaper than using the car. 1. Providing Low Traffic Neighbourhoods (LTNs) in all residential areas by 2030, which prevent through traffic, but retain permeability for active travel (bus, walking & cycling). 2. Making ‘School streets’ the default arrangement, which close roads outside schools at the start and end of the school day. 3. Increasing parking charges for larger and more polluting vehicles. 4. Ensuring that Barnet is “Smart Road User Charging ready” by 2024 as part of a London-wide scheme. 5. Supporting a dense network of shared mobility schemes by 2024. 6. This policy needs to do much more to enable people to choose cycling as their preferred mode of sustainable transport. Develop a programme on a large scale that will motivate people to cycle their daily journeys, help them to get a bike, provide storage for it and teach them how to maintain it. 7. In parallel, develop programmes that discourage use of private vehicles, including PHVs, for journeys into, through or within Barnet. 8. Provide the infrastructure and traffic conditions that will make people feel it is safe and convenient to cycle: Build 50% of the prioritised strategic cycling corridors (as identified in TfL’s Strategic Cycling Analysis) by 2024 and 100% by 2030. Match other boroughs and TfL by moving to a general 20 mph speed limit. 9. Promote ownership and usage of E-bikes by committing to the installation of charging points within cycle storage areas and working with TFL to deploy hire-Ebikes at locations within the Borough.	The Long Term Transport Strategy is the more appropriate platform for considering these issues in detail. TRC01 has been revised to reflect the LTTS.	Yes
Ramblers Association	Policy TRC01	Add part c) For all development proposals the Council will require, in the first instance, the needs of pedestrians to be considered in respect of: 1) Ensuring good connections to the strategic and local walking networks; 2) A healthy, safe and attractive walking environment within the development; 3) opportunities for improvements to the wider walking environment.	TRC01 has been revised to emphasise improvements for pedestrians and cyclists	Yes
TfL	Policy TRC01	Welcome Council’s commitment to implementing the Healthy Streets Approach (including applying the ten Healthy Streets Indicators) and to achieving the Mayor’s Vision Zero ambition. We also commend the Council for its recognition of the importance of active travel in improving health outcomes and the role reducing car journeys has in improving air quality. We have some minor suggestions how the Council could further build on this policy to achieve its stated aims. Firstly, the policy seeks to deliver a more sustainable network by ‘...encouraging sustainable modes of transport’. While encouragement is always welcome, it is important that interventions enable more sustainable mode choice, for instance by ensuring walking and cycling routes are safe and attractive, and that public transport connections are quick and reliable. We will work with the Council to develop plans to do this. We support Council’s position of refusing proposals that have an unacceptable impact on highway safety (although ‘increase in road danger’ would more accurately focus this point on the source of risk). We agree with the intention of avoiding ‘severe impact on the road network’ although would encourage the link to parking policy to be considered, as reduced parking provision reduces significantly the impact on road network performance. The Council could also expand on all major development proposals being expected to contribute towards wider active travel improvements, such as through delivering enhanced public realm, improved street crossings, or additional cycle parking at nearby stations or town centres. We welcome requirements for Transport Assessments, Travel Plans and Construction Management/ Delivery and Servicing Plans for major developments, although Transport Statements may also be appropriate for minor development. We would appreciate a reference and/or link (https://tfl.gov.uk/info-for/urban-	TRC01 has been revised. The Council continues to support modal change and will continue to seek ways to bring forward initiatives to facilitate active travel. Text revised to focus on highway safety. There is no stipulation in the London Plan to make Transport Assessments a requirement for minor developments.	Yes

		planning-and-construction/guidance-for-applicants) to TfL guidance on how to produce these documents to help ensure the right information is included.		
Former MHNF	Policy TRC01	Where multiple developments come forward in an area from different developers, they should be required to assess the transport infrastructure in combination, fully assessing the impact of all developments when they are all fully built out. Equally their cumulative impact on air quality must be assessed realistically and objectively	TRC01 requires a construction management plan and/or a delivery and servicing plan for all major developments. Environmental Health colleagues are able to consider cumulative impacts on air quality.	No
Brent Cross South Partnership (DP9)	Policy TRC01	TRC01 aims to "deliver a more sustainable transport network ... by reducing car dependency, encouraging sustainable modes of transport and improving air quality", whilst one of the key objectives of the Local Plan is to improve sustainable travel options including walking and cycling. However, the measures set out within Policy TRC01 do not clearly set out measures that will be taken to promote walking and cycling within Barnet. Whilst TRC01 does identify support for the Healthy Streets approach (which amongst other things incorporates new walking and cycling routes), the policy predominantly focuses on public transport infrastructure delivery and development impact on the highway network. This is considered a missed opportunity to promote two modes critical to achieving TfL's modal shift objectives. The Draft Local Plan recognises that issues exist with orbital travel within the Borough (paras 2.6.1, 11.3.2) and improvements to orbital public transport are identified as being of importance "if suitable alternatives to car use are to be delivered effectively" (para 2.6.4). However, TRC01 does not reference these improvements, and it is not clear what steps will be taken to address this identified issue. This policy references "severe" and "adverse" impacts. It would be helpful if definitions of these words could be provided so these impacts are measurable.	TRC01 revised to amplify steps to promote walking and cycling. References to improvements to orbital travel have been added. Severe and adverse impacts clarified	Yes
New Barnet Community Association	Policy TRC01	While promoting active travel and reducing car usage there seems to be a lack of measures to enable this.	TRC01 revised to amplify steps to promote walking and cycling.	Yes
Brent Cross South Partnership	Policy TRC02	Reference to the new bus station at Brent Cross should clarify that it is to replace the existing Brent Cross Shopping Centre bus station and is not within the BXS scheme	Agreed	Yes
Ramblers Association	Policy TRC02	Map outlining Strategic Walking Network and add reference to part a).	The Local Plan together with the Long Term Transport Strategy promote strategic walking routes such as the Barnet Loop which has been added to the Glossary.	Yes
Former MHNF	Policy TRC02	This policy should specifically recognise the significant current deficit in tube line operations to/from Mill Hill East. The shuttle service to/from Mill Hill East is woefully inadequate today and as more properties are occupied in Mill Hill East the situation will become much worse without positive action. More trains need to be through trains throughout the day and the trains need to be much more frequent, say every 6-8 minutes rather than 12-15.	Growth within the Mill Hill East area will support improvements to public transport. Policy GSS07 has been revised to outline more specific improvements.	Yes
Barnet Cycling Campaign	Policy TRC02	The plan recognises the need to invest in public transport lines and interchanges and we support investment in orbital and radial public transport.	Support welcomed	No
Barnet Cycling Campaign	Policy TRC02	Secure cycle storage / stands should be provided near key bus stops to enable mode sharing e.g. cycling a short distance and then catching the bus to travel further is particularly useful for longer or hilly orbital journeys like Routes 251, 107, and 307. Ensure that cycle parking is adequate and easily visible to public view to discourage theft and that secure "cycle hubs" are provided at large busy stations. Cycling speeds can be faster than motor traffic, especially when segregated cycle lanes are provided. It is vague on plans for infrastructure that will enable people to use buses, walking and cycling to reach new train and underground stations. Barnet needs to provide infrastructure for buses and to enable people to cycle safely around the borough. 1. Support more bus lanes and the introduction of bus gates in healthy streets neighbourhoods to make bus journeys more efficient than car journeys. 2. Complete a borough-wide cycle network by 2030, based on TfL's Strategic Cycling Analysis, with enhancements where further needs can be identified. 3. Develop area-wide healthy streets neighbourhoods (low traffic	The Long Term Transport Strategy (LTTS) is the more appropriate platform for considering these issues in detail. TRC02 has been revised to reflect the LTTS.	Yes

		neighbourhoods) to cover the entire borough by 2030 - it is not sufficient to confine healthy streets to new developments and occasional public realm schemes. 4. Provide secure cycle parking and cycle hubs.		
Finchley Society	Policy TRC02	TRC02vi How does this fit in with the North Finchley SPD?	This is consistent with the North Finchley SPD	No
TfL	Policy TRC02	We strongly welcome the Council's support of delivery of new and enhanced transport infrastructure. Under part a iv), we request that the Council refers to Brent Cross West station as part of the West London Orbital. Under part a v), we request that the Council refers to 'stopping and standing' rather than just 'stopping'. It is vital for ensuring bus reliability that bus stands are retained or appropriately re-provided through new development. We welcome continued close working with the Council to enhance rail services in Barnet, including enhancing London Underground stations. We would welcome further discussion on a range of potential improvements, such as delivering step-free access, expanding gatelines, improving station capacity, and/or improving line capacity. An essential element of enhancing rail capacity is through protecting land for transport use and we urge the Council to give this adequate protection. Line capacity enhancement in particular needs land to be protected for future stabling requirements. TfL will work with the Council to determine the exact nature of future stabling requirements, and we would strongly welcome a policy commitment to protecting land for this.	Agreed. We welcome support on this policy and refer to our discussions with TfL about stabling and future capacity plans.	Yes
Barratt London (QUOD)	Policy TRC03	Where car free residential development is proposed in areas of PTAL 5 and 6 the policy requires a CPZ to be in place within the immediate vicinity of the development before occupation. Do not consider this policy to be sound as it is not flexible and may, due to unforeseen circumstances fetter development, as the acceptability and adoption of the CPZ will be dependent on third parties. The wording should be revised to state that "Where car free residential development is proposed in areas of PTAL 5 and 6, if it is deemed that a CPZ is necessary, then this should be in place within the immediate vicinity of the development before occupation".	Agree	Yes
Redrow Homes	Policy TRC03	Part b) to require contributions from developments towards CPZ's where it can be shown they would have an adverse impact on parking.	Agreed. Contributions will be justified.	Yes
Fairview Estates	Policy TRC03	TRC03 sets out the required level of car parking for new development within the Borough. The parking requirements set out in the plan does not comply with the standard detailed within the intent to publish London Plan. The policy requires more car parking spaces to be provided for 3+ bedroom units than set out within the London Plan.	Barnet's Car Parking Study sets out the basis for the locally specific approach to parking provision. The Council accepts the need for restraint in terms of car parking management, but intends to apply the standards set out in Table 23 with sensitivity to local circumstances.	No
TfL	Policy TRC03	Welcome the approach to reduce car use, implement Healthy Streets and achieve Mayors Vision Zero ambition. Concern in regard to higher provision of spaces per dwelling (0.5) than London Plan. Would welcome further dialogue on approach to CPZs.	Barnet's Car Parking Study sets out the evidence to underpin this policy, helping to understand the pattern between property size and PTAL in the Borough.	No
TfL CD	Policy TRC03	Table 23 does not fully accord with Table 10.3 of the draft NLP which requires that all areas in London with a PTAL of 5 or 6 should be car free. The Council's proposed standard is also higher than the draft NLP for sites with PTAL 4, 3 and 2. Oppose the paragraph b) requirement for a CPZ to be in place within the immediate vicinity before occupation of a 'car free' development. the introduction of a CPZ does not fall within the control of an applicant and this objective has to be driven and promoted by the Council.	See response above	No
Former MHNF	Policy TRC03	Parking Management. This area should recognise the impact that "smart technology" can bring forward and LBB should take every opportunity to lead in the utilisation of new technology to, for example, make payment for parking "on exit" a reality both in car parks and for on street parking. This would greatly reduce parking penalties and the need to pay staff to issue them. This would also inform drivers where	Technology has an important part to play in ensuring efficient use of car parking spaces. The Plan is not the right document to set out what this technology is but it is certainly an area that the Council is looking at.	No

		there is space to park in real time, thus reducing the congestion caused by hunting for a space, which is estimated to take up 30% of time around Town Centres.		
Friern Barnet and Whetstone Residents' Association	Policy TRC03	<p>4. Car Parking - in the context of new housing provision – the practice of using the streets as a dumping ground for overspill parking. One of the consistent features of planning outcomes in Barnet has been a willingness of the Council to allow on-street parking to count towards car parking provision required for new residential developments and conversions. This has had the consequences that the Borough's roads have become increasingly difficult to navigate, with parked vehicles narrowing the available carriageway resulting in increased congestion, pollution and longer journey times and also, as much parking by residents in proximity to their homes is long term (as many travel to work by public transport, leaving the car behind), the pool of on-street parking spaces available for short term parking by visitors to an area – whether tradesmen, shoppers or others is diminished. Para 11.6.5 states “Where development proposals are on the edge of a CPZ, to ensure there is sufficient on-street capacity, a parking survey will be required of the streets outside the CPZ.” – thus demonstrating that the authors of the plan envisage the practice of using the streets as a dumping ground for overspill parking will continue! The cause of the problem is twofold-First, the willingness of the Council to allow on-street parking to count towards required car parking provision and, secondly, the use (in common with many other local authorities) of the so-called “Lambeth Parking Survey” model. We believe that the Lambeth model is fatally flawed and should no longer be used by Barnet Council. The Lambeth model focusses on measuring parking availability for residents living in the immediate vicinity of an application site. Thus the Lambeth guidelines state (for residential developments): “The Council requires a parking survey to cover the area where residents of a proposed development may want to park. This generally covers an area of 200m (or a 2 minute walk) around a site “The survey should be undertaken when the highest number of residents are at home; generally late at night during the week. A snapshot survey between the hours of 0030-0530 should be undertaken on two separate weekday nights (i.e. Monday, Tuesday, Wednesday or Thursday).” It will be seen from the above that the purpose of the survey is to demonstrate that there is sufficient on-street capacity to accommodate overnight “overspill” parking from the proposed development. The methodology fails to measure or to protect daytime availability for short term parking. Further, Policy TRC03 provides for a maximum level of parking provision, not a minimum. In the context of a need to protect the availability of short term on-street parking for visitors to a locality it follows that a policy which sets a maximum, but not a minimum is flawed. This needs to be addressed. We propose that: 1. The Plan commentary should expressly recognise that long-term on-street parking by residents of new residential developments and conversions is unacceptable and that all anticipated long term parking needs of the residents of such developments must be met by on-site parking provision. 2. Policy TRC03 should be amended to read “a) the Council will require that residential development (including conversions) will provide on-site parking in accordance with Table 23 and so as to accommodate on-site all anticipated long term parking needs of the residents. For multi-unit proposals the maximum parking provision will be rounded up to the next whole number.” 3. Barnet abandons the Lambeth methodology and, in exceptional cases where a car parking survey is still needed, adopts a replacement that addresses availability of daytime parking for short-term use. Note that 11.6.5 would need revision.</p>	<p>It has been long established national policy that a restraint based approach is used for car parking. The Council continues to support and justify a bespoke residential parking policy for Barnet which responds to local circumstances.</p> <p>The approach to restraint based car parking in the Local Plan is consistent with what is set out in Para 18.8.5 of the 2012 Local Plan Development Management Policies document.</p> <p>The technical details of parking survey methodology are more of a matter for the Highways Service and the Local Plan makes no specific reference to the modelling used. The ‘Lambeth Council Parking Survey Guidance Note’, although not the only methodology, is the most established guidance document for parking studies across London. Investigation of the impact on highway conditions forms an important part of the Council’s analysis of proposed developments and, therefore, it is essential that enough information is submitted by a developer to allow a full analysis of the issue. The Lambeth Model provides the basis for this analysis. However, as behavioural patterns change a different methodology could be applied.</p>	Yes
Marsfield (Avison Young)	Policy TRC03	Car ownership rates and travel patterns of older people are different to younger people, accordingly they generate different car parking needs. Furthermore, SOPH schemes (such as Marsfields’ Later Living concept) incorporate communal/shared private transport services such as car-clubs and chauffeured cars which have a further impact. Accordingly, in our view it is inappropriate to apply ‘regular’ residential car parking standards to SOPH and that a more bespoke approach is required. Accordingly, we recommend that Policy TRC03 is amended to make clear that residential car parking	Policy applies to all residential development and factors in public transport accessibility. Requirements can be applied flexibly if residents in such accommodation have mobility impairments.	No

		standards do not apply to SOPH, where provision should be assessed on a case by case basis. The same principle applies to cycle parking.		
Brent Cross South Partnership (DP9)	Policy TRC03	We agree that flexibility should be applied as stated in supporting text, and this should be reflected explicitly in policy wording. Section g) of Policy TRC03 states “spaces should be available for car club vehicle parking along with car club membership for future residents of the development”. Clarification is sought as to whether this would apply to all residential development (regardless of size and type), and whether such parking provision is expected to be provided off-street or on-street. We suggest that flexibility is applied to this policy and this requirement is considered on a site by site basis taking account of the specific proposals and site-constraints.	The policy focuses on residential development and car clubs can form part of the overall parking provision. There is an expectation that provision is off street..	No
Former MHNF	Policy TRC03	The London Plan standards for EV Charging points in new developments should provide the capability at 50% of all spaces if we believe electric vehicles (rather than say hydrogen) become the way forward. Many more electric charging points need to be provided at on street parking points, perhaps 20% of all spaces, such that they become the norm, not the exception. Taxi charging points and EV charging across the area must be increased widely rather than just in new developments.	Table 16 revised to be in accordance with London Plan Standards – that is 20% active charging facilities with passive provision for all the remaining spaces.	Yes
Home Builders Federation	Policy TRC03	Table 23 – Residential Car Parking Standard – will need to be updated in line with the Secretary of State’s directed changes to the Draft London Plan. Part f) requires that electric vehicle charging points are provided in line with the Draft London Plan. Despite what the Draft London Plan says, HBF would advise against making policy in this area owing to several complications. HBF prefers a national and standardised approach to the provision of electrical charging points in new residential developments. We would like this to be implemented through the Building Regulations rather than through local planning policy. If the Council does choose to make policy in this area there are several issues that it will need to consider carefully. The Council’s work should be supported by evidence demonstrating the technical feasibility and financial viability of his requirements. Any requirement should be fully justified by the Council including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all, or a proportion of dwellings, have charging points. We argue this because if re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables. This might mean that new sub-station infrastructure is necessary. There are also considerable practical difficulties associated with provision to apartment developments or housing developments with communal shared parking rather than houses with individual on plot parking. If residents do not run cars, let alone electric cars, they would be forced to pay for the electricity consumed by electric car owners as this cannot be apportioned to the electric car owner. This would be unfair on non-car users. This will be an important consideration as the Local Plan requires the construction of flats as the most common residential type. The NPPF requires that any policy, including a requirement for charging points, should be clearly written and unambiguous (para 16). The policy will need to specify the quantum and type of provision sought either AC Level 1 (a slow or trickle plug connected to a standard outlet) or AC Level 2 (delivering more power to charge the vehicle faster in only a few hours) or other alternatives. Part g) – the council states that car club spaces should be provided. It should clarify if this is also a requirement for car-free developments in PTALs 5 and 6. Part g) also specifies that car club membership should be provided for future residents of the development. The Council will need to clarify its intentions here. Is this for both new and existing residents? Does this include children too? How will the applicant be expected to calculate the number of future residents? How does the Council expect to calculate the financial implication of this for its viability appraisal? For example, Enterprise Car Club advertises an annual membership fee of £60.	The Council continues to support and justify a bespoke residential parking policy for Barnet which responds to local circumstances. It therefore justifies a variation with the London Plan in respect of residential standards. We consider that in terms of the electric charging standards the London Plan has the right approach. Text has been revised to clarify that car clubs form part of overall parking provision. Wording has been revised to clarify terms of car club membership.	Yes
CPRE	Policy TRC03	We have serious concerns about policy on parking as per policy TRC03 which does not discourage private car ownership enough or promote car-clubs as a viable alternative. <u>This policy and Table 23</u> should be amended to state that the starting point for all development is that is should be car-free, new	The Council has applied a more flexible approach to residential development that is reflective of Barnet’s local context. The supporting text for TRCO3	No

		development will be planned around car clubs / hire schemes rather than private car ownership, where PTALs are low, transport will be improved to ensure people can live car-free, the maximum parking spaces per unit for new development in low PTAL areas will be 0.3 (to ensure new development is planned around sustainable transport), where provision is made for private car ownership, that this is located at the edge of development and in such a way that the space could be re-provisioned for other uses, in anticipation of private car ownership falling.	recognises that as an outer London borough, it faces the challenge of low levels of public transport accessibility and a lack of orbital travel options, which warrants a flexible approach.	
London Living Streets	Policy TRC03	Does not discourage private car ownership enough or promote car-clubs as a viable alternative. This policy and Table 23 should be amended to state that the starting point for all development is that is should be car-free, new development will be planned around car clubs / hire schemes rather than private car ownership, where PTALs are low, transport will be improved to ensure people can live car-free, the maximum parking spaces per unit for new development in low PTAL areas will be 0.3 (to ensure new development is planned around sustainable transport), where provision is made for private car ownership, that this is located at the edge of development and in such a way that the space could be re-provisioned for other uses, in anticipation of private car ownership falling.	The Council has applied a more flexible approach to residential development that is reflective of Barnet's local context. The supporting text for TRCO3 recognises that as an outer London borough, it faces the challenge of low levels of public transport accessibility and a lack of orbital travel options, which warrants a flexible approach.	No
Harrison Varma Ltd	Policy TRC03	The proposal to encourage a wider use of car-free development and/or more limited levels of car parking to residential developments within more accessible locations is supported. This will assist in ensuring that the capacity of such sites can be optimised as far as is possible which supports the overall delivery of additional units in locations in or adjacent to town centres and transports hubs. Reduced requirements for car parking capacity will allow more units to be delivered in locations where public transport is easily available.	The Council welcomes this support.	No
Barnet Cycling Campaign	Policy TRC03	Policy focuses on what's allowed in new developments but needs to extend borough wide and support policies ECC01, TRC01 and TRC02 to discourage private car use and favour active travel by: 1. Restricting parking on bus routes to allow free passage for buses and cyclists. 2. Extending bus lanes on the wider main bus routes and making them operational 7 days a week. 3. Increasing parking charges for larger and more polluting vehicles in car parks, CPZs and on street. 4. Providing economical, secure cycle parking for every resident – using on street bike hangers where needed in place of parking spaces. 5. Enforcing the ban on pavement parking and committing to a phased reduction in on-street parking. 6. Providing car club vehicle parking where appropriate. 7. Restricting the types of vehicle allowed to park in new developments to smaller and less polluting models or electric vehicles. 8. Assisting residents with personal travel planning and rewarding residents who give up car ownership, allowing Barnet to meet the residential parking standards given in the draft London Plan (rather than the increased levels proposed in Table 23).	The Long Term Transport Strategy (LTTS) is the more appropriate platform for considering these issues in detail. TRC02 has been revised to reflect the LTTS.	No
Redrow Homes	Policy TRC03	Support	Welcome the support	No
Barnet Cycling Campaign	Policy TRC04	Policy needs to recognise the value of enabling working from home to reduce the overall need to commute, not only to travel outside peak periods.	Agree – this point has been highlighted by Covid19 and enforced behavioural change. Reference added to facilitating home working.	Yes
Former MHNF	Policy TRC04	New developments should provide fibre connection into each and every property. This is vital to support the high numbers of homeworkers and periods of self-isolation.	This is now an expectation of developers and landlords from new home owners and tenants. Part R1 of the Building Regulations 2010 requires buildings to be equipped with at least 30 MB/s ready in-building physical infrastructure, however new developments using full fibre to the property or other higher-grade infrastructure can achieve connectivity speeds of 1GB/s.	No

Pocket Living	Table 23	To maximise delivery of affordable homes, Pocket Living developments are car-free and suggest the footnote excludes 'so that provision across the site is less than 1.5 spaces'.	HOU01 makes reference to innovative affordable housing products. The Plan is clear on which locations may be suitable for car free housing .	No
LB Brent	Table 23	The Council notes that some of these standards, more specifically those for the low PTAL areas, are more generous than those set out in the Secretary of State's Direction to modify the Intend to Publish London Plan. It understands the challenges around encouraging more sustainable forms of travel in low PTAL areas and that LB Barnet is prioritising the majority of its development in areas with higher levels of PTAL to reduce car dependency. Nevertheless, increasing parking provision will encourage greater movement by car, producing additional trips outside the LB Barnet. As such LB Brent encourages LB Barnet to use the parking standards in the emerging London Plan. Amend residential parking standards to be consistent with those in the London Plan.	The Council continues to support and justify a bespoke residential parking policy for Barnet which responds to local circumstances. It therefore justifies a slight variation with the London Plan This will be reflected in our Statement of Common Ground	No
Redrow Homes	Table 23	Table 23 should be brought in line with Table 10.3 of the draft London Plan.	The Council has applied a more flexible approach to residential development that is reflective of Barnet's local context. Supporting text for TRCO3 recognises that as an outer London borough, it faces the challenge of low levels of public transport accessibility and a lack of orbital travel options, which warrants a flexible approach.	No
Finchley Society	Table 23	These figures are noticeably higher than those in the Draft London Plan. They will have to be supported with evidence - what demand will be, and the effect on the road network..	These figures are supported by Barnet's Car Parking Study 2019	No
Barnet Cycling Campaign	Chapter 12	With ongoing delays to schemes in North Finchley and Brent Cross, it would be useful to know how much has been spent since 2011 on walking and on cycling and what has been delivered. Studies have consistently shown that investment enabling people to cycle has a far higher benefit to cost ratio than investment in other transport modes – at least 5:1 and up to 20:1 or more in some cases. For next stage of consultation, we urge the Council to publish a revised Local Plan and associated IDP that takes walking and cycling seriously and commits to ambitious interventions, target dates and spending.	The Long Term Transport Strategy sets out proposals for increasing walking and cycling. The Local Plan has been updated to reflect the progress of the Transport Strategy. The IDP has been published with the Local Plan Reg 19.	No
Elizabeth Silver	Chapter 12	Sustainable development is widely understood to mean <i>'development which meets the needs of the present without compromising the ability of future generations to meet their own needs'</i> . (definition set out in Our Common Future, a report by the UN World Commission on Environment and Development - the Brundtland Commission- in 1987) It is critical that provision for healthcare, water and sewage need to be put in place before development starts, not when the last resident has moved into a development. Some spare capacity for these has to be built in to the plan, otherwise the development is unsustainable. Healthcare facilities should not rely on CIL and S106 contributions. Developers can claim exemption on grounds of economic viability. It is known that the CIL and S106 pots are sometimes not even accessed for use in the development for which they were levied. Comment: The alternative is chaotic; Water shortages are predicted in 30 years' time. https://www.standard.co.uk/news/uk/london-and-southeast-face-major-water-shortages-by-2050-environment-agency-warns-a3846226.html	The Reg 19 Local Plan is supported by the Infrastructure Delivery Plan (IDP) which provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No
Metropolitan Police Service	Section 12.2	Requirement for 2.5-5 hectares of open industrial land is required for a car pound by the MPS in addition to a neighbourhood police facility.	The Council supports the efficient use of land, primarily to deliver new homes. Therefore Barnet cannot meet the requirement for a car pound. In terms of a neighbourhood police facility, town centres seem the most appropriate location for such provision.	No
Finchley Society	Section 12.2	This section rightly states that the Infrastructure Development Plan is a key part of the Local Plan. In particular, residential development must be phased to allow for social infrastructure to be put in place. It would have been convenient to comment on a draft Infrastructure Development Plan as a part of this	The IDP has been published. It is a living document subject to update.	No

		consultation, but no draft of it seems to be available. It is essential for it to be available for comment well before the Regulation 19 consultation begins.		
Barnet Cycling Campaign	Section 12.2	Infrastructure Delivery Plan (IDP) doesn't appear to have been published, to show what has been delivered, since November 2012 and a revised IDP will not be issued until the next stage of consultation.	The IDP has been published. It is a living document subject to update.	No
Brent Cross South Partnership (DP9)	Para 12.1.1	This paragraph should also reference the use of planning conditions as a possible mechanism for delivering infrastructure.	Planning conditions are not a robust mechanism for infrastructure delivery	No
TfL	Para 12.1.1	This text should be amended. Planning obligations are used to address site specific issues and must meet the three legal tests in the Community Infrastructure Levy (CIL) regulations. Notably, recent changes to the CIL regulations have also removed Section 106 pooling restrictions and the requirement for a regulation 123 list, and Section 106 and CIL can now be used to fund the same piece of infrastructure.	Text revised	Yes
Geoffrey Silver	Para 12.2.1	So why is there now overcrowding on trains leaving Mill Hill East in the morning rush hour?	Mitigating problems with overcrowding is considered through the IDP, Long Term Transport Strategy and Strategic Transport Assessment	No
Brent Cross South Partnership (DP9)	Para 12.2.1	The Infrastructure Delivery Plan forms a key part of the evidence base. We would welcome clarity on the status of this document and how draft policies will be informed by its findings.	The IDP and Infrastructure Funding Strategy have been published as part of the Reg 19.	No
TfL	Para 12.3.1	This text should be amended. Government has published amendments to the CIL Regulations, which took effect on 1 September 2019.	Text revised	Yes
TfL	Para 12.4.1	NPPG sets out that formulaic approaches to planning obligations should not be set out in SPDs, as they are not examined. The Council may wish to consider what obligations may be subject to formulas and include these in the local plan, particularly in relation to supporting improved bus services and managing any cumulative impacts of growth.	Text revised to clarify this.	Yes
Barnet CCG	Para 12.4.1	Supports section on planning obligations and welcomes this paragraph which recognises that section 106 contributions may be secured for an item of infrastructure, in-kind, or a financial contribution towards it.	Support welcomed.	No
Metropolitan Police Service	Para 12.4.4	Welcome inclusion of policing under S106/CIL contributions and would like to work with the Council on this matter	The Council welcomes this support	No
Finchley Society	Para 12.4.4	This section should indicate how much has been and is being achieved through Section 106 agreements before relying on them for the provision of schools, health facilities etc. This reliance seems very optimistic	This is covered in the Authorities Monitoring Report which is published annually	No
Barnet CCG	Para 12.7.1	Referring to a set of key indicators and targets developed to monitor the effectiveness of policies against the objectives, these indicators and targets should be included in the draft plan.	Agreed – this has been added to Chapter 12	Yes
Former MHNF	Para 12.8.1	The Council's powers and commitments to enforcement should be fully explained and clarity re Enforcement Action that will be taken in cases of infringement clearly expressed. We emphasise the need for a Code of Construction Practice to be issued by the Council. We believe that there should be more encouragement of Neighbourhood Planning generally in the Local Plan with more provision of hooks from which locally specific policies can hang. Further, it should be clear how Neighbourhood Forums will influence the use of the 25% share of CIL (Community Infrastructure Levy) payments that are to be set aside for initiatives in their designated area.	More detail of the Council's activities on enforcement has been added. The appropriate platform for advice on neighbourhood planning is the Council's planning webpages.	Yes
St William Homes LLP	Para 15.2.1	The Council has applied the density matrix from the London Plan (2016) to assess the indicative residential capacity of sites (paragraph 15.2.1). The draft London Plan deletes this approach to density and instead adopts a design led approach with intention to optimise housing delivery, therefore Barnet's draft Plan should be updated to reflect this.	To ensure consistency on this approach the sustainable residential quality (SRQ) density matrix has been used to provide a standard means of calculating indicative residential capacity. This	No

			provides a good basis for a more detailed design led approach as proposals near the planning application stage.	
HADAS	Glossary	Add: HADAS – The archaeological society for the London Borough of Barnet. The Hendon and District Archaeological Society (HADAS) was founded in 1961 to find and prove, on the ground, the Saxon origins of Hendon. Since that time the Society has expanded in area, today encompassing the whole of the London Borough of Barnet and its expertise, excavation and research now covers all archaeological periods. http://www.hadas.org.uk	Agreed	Yes
TfL	Glossary	PTAL stands for Public Transport Access Level (to distinguish it from physical/step-free accessibility) and TLRN stands for Transport for London Road Network.	Agreed	Yes
Modomo (Modular Housing)	Glossary Meanwhile Uses	Expansion of definition to 'The temporary use of vacant buildings or land for a socially beneficial purpose <u>including residential use</u> , until such a time that they can be brought back into commercial <u>or residential use again</u> .'	Agreed	Yes
Historic England	Annex 1	We would like to stress the importance of taking historic assets, and their settings fully into account when assessing the suitability of sites for development and their suggested uses/capacities. Generally we are pleased to see the allocations expressed as a schedule with specific development considerations. Where heritage assets have been identified they have been indicated clearly as factor that must be taken into consideration when designing potential schemes. This will help guide development positively. We welcome reference to locally listed buildings as planning considerations where relevant. We advise that more detail is added to the site specific development criteria set out in Annex 1 as the plan progresses. For example, where potential allocations will impact upon the setting of conservation areas we advise that key local views identified in conservation area appraisals are specifically mentioned in the site description and as a specific planning consideration. We are pleased to see that the site specific criteria make it clear where tall building will not be appropriate but feel that this could be done more consistently e.g. in East Finchley and in other areas where the Tall Buildings Update has found them to be inappropriate for tall buildings. While we have identified areas where site specific policies should be improved we raise no objection to any in principle provided.	Proposals revised to reflect any historical asset	Yes
Mayor of London	Annex 1	The Mayor welcomes including the projected PTAL at 2031 in the Site Allocations. Public land sites and surplus transport infrastructure are subject to a 50% affordable housing threshold, except where the Mayor has agreed a portfolio approach.	The Council is aware of this approach.	No
North Finchley TC (Quod)	Annex 1	Annex 1 identifies the supply of sites needed to meet the projected level of growth within the borough, which includes a number of sites within North Finchley. Our client supports the allocation of development sites within North Finchley but has comments in respect of Sites 58 and 61.	The Council welcomes this support.	No
Barnet CCG	Annex 1	Large developments on sites which include a significant number of new homes will generate a site-specific impact on healthcare, which will need to be addressed by new on-site provision and/or a s106 financial contribution. The CCG would welcome the opportunity to discuss the impact of these sites on healthcare infrastructure, particularly in the Edgware Growth Area.	The Council will ensure continuous engagement with the CCG in discussion on the potential healthcare infrastructure impacts of proposals as it has recently with the Edgware Town Centre SPD.	No
Harrison Varma Ltd (Savills)	Annex 1	In preparing Site Allocations, the residential density matrix that formed part of the London Plan (2016) has been used. Whilst it is accepted that this provides for a consistent initial analysis for potential density in order to establish the potential to meet the Local Plan's housing target, it is not considered appropriate that this will be the only basis on which capacity should be based. The density matrix is not being carried through into the replacement London Plan that is due to be adopted in 2020 (and certainly prior to the further assessment and adoption of the Council's Local Plan). Replacement London Plan Policies GG2 and H1 are both clear that optimum development capacity of all sites should be determined via a design-led approach that also supports intensification of locations that are well-connected to public transport. Given the late stage of the examination of the replacement London Plan, considerable weight should be	The Council's approach has been to assess site capacity on site size and public transport accessibility level (PTAL). This has helped determine the range of appropriate dwelling densities for residential development, and thus an indicative number of dwellings. To ensure consistency on this approach the sustainable residential quality (SRQ) density matrix	No

		given to the policies contained within it. This means that capacity of any Site Allocation should not be limited by the previous density matrix; any housing figure for a site that is generated via the density matrix should be considered as a minimum with further capacity encouraged where design and amenity considerations allow. To this should be added that following the formal response dated 13 March 2020 from the Secretary of State to the Intention to Publish version of the London Plan, it is clear that the Government considers that housing delivery most go even further than the levels including in the London Plan. This places even greater emphasis upon the need to optimise all sites as far as is possible and not be limited by a matrix that does not reflect current requirements. All Site Allocations should therefore be clear that indicative capacity is a minimum and additional units should be delivered wherever possible via a design-led optimisation of the site. In each of these cases, the sites have the potential to deliver additional residential units that will play a part in the Borough achieving and exceeding its housing delivery targets. Opportunities to optimise delivery on each site could further increase the number of units that could be delivered through well-designed schemes that respond to the specific character and context of each location. Both sites should therefore be assessed in more detail as part of the ongoing Local Plan adoption process.	has been used to provide a standard means of calculating indicative residential capacity. The Council welcomes submissions of proposals that support intensification in locations that are well connected to public transport. Such proposals can come forward and be supported within the existing planning framework.	
London Diocesan Fund (Iceni Projects)	Annex 1	Barnet have published a site Selection Background Document which outlines the methodology that the Council have adopted to assess what sites are suitable, available and achievable for housing. Sites with certain planning policy designations were considered to be incompatible with the designation of potential development sites; primarily Green Belt and Metropolitan Open Land. The site was therefore rejected on the basis that it is Green Belt alone and was not taken forward as part of the more detailed assessments. To be considered deliverable sites for housing, they should be immediately available in a suitable location for development and achievable with a realistic prospect that housing will be delivered on the site within five years. Aside from being situated the Green Belt, the site meets the tests which make it deliverable. We do not consider this approach to be sound as the Green Belt is not an environmental policy that makes all sites unsuitable. The Green Belt is a spatial policy which should not be used to deem sites unsuitable on this basis alone. This decision is a Borough-wide one which should be made in the context of deciding whether Exceptional Circumstances exist (which has not properly taken place within the established parameters of the Calverton judgement).	The Council's approach on Green Belt is clear and justified. It is consistent with the London Plan and national policy.	No
Environment Agency	Annex 1	Of the 67 sites, 5 have significant areas within the site of Flood Zone 2 and 3 (medium and high risk of flooding from rivers). Two of the sites although mostly in Flood Zone 1 (low flood risk) have some partial risk (Flood Zone 2 and 3). We have significant concerns about two of the sites proposed (Site 6 Watling Avenue car park and market and Site 9 Colindeep Lane) due to the severity of the potential flood risk.	We refer to our responses on sites	Yes
East Barnet Residents' Association	Site 1	Acceptable if a sympathetic development adheres to the planning considerations stated.	We welcome this support	Yes
Historic England	Site 1	<i>See response for full list of heritage assets that could be impacted by development of this site. We are pleased to see that the schedule makes reference to the onsite listed building and adjacent church, and that consideration must be given to these assets. However, there is a relatively high concentration of designated heritage associated with this site and we advise that heritage could be better represented as a key issue to consider in the development of this site. We advise that the policy is amended to better describe the heritage assets on and adjacent to the site, as well as the potential presence of archaeological remains. The policy should also make specific reference to their setting.</i>	Agreed	Yes
HADAS	Site 1	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Home Group	Site 10	Home Group is one of the UK's biggest housing associations and provides long term integrated housing, health and social care. As a social enterprise and charity all surplus income generated outright sales activity is reinvested in social homes and communities. In the London Borough of Barnet, the 3.9ha Douglas Bader Park Estate currently provides 271 existing homes, comprising of a mix of 140	We welcome this support and the background information on Site 10. Proposal has been updated	Yes

		<p>houses and 131 flats. Home Group owns the freehold to the site, and all homes are rented (26 are Affordable Rent, with the remaining 245 Social Rent). In 2016 a full assessment was carried out of the Douglas Bader Park estate, identifying homes within the estate that failed to meet the aspirations of Home Group to deliver better quality accommodation for their customers. The majority of the properties (99.3%) on the estate fail to meet London Plan Space Standards, with the current floor area totalling 15,771sqm whereas there is a requirement today for 20,524sqm for the equivalent unit size mix. Additionally, the homes were built in the 1970s utilising Wimpey No Fines and will need significant investment to maintain both now and in the near future. Many of the homes are no longer fit for purpose and do not meet the housing need of Home Group customers. Home Group in a Joint Venture with Hill has undertaken pre-application advice discussions with both LBB and the GLA in relation to the future regeneration of the site. These pre-application discussions have been positively received by both LBB and the GLA. In accordance with the Mayor's Estate Regeneration policies, a successful residents ballot was held in May 2019 where 90.5% of eligible residents participated and 75.4% voted in favour of the regeneration. This demonstrated that an overwhelming majority of residents are in favour of the regeneration of the estate. Following the outcome of the Ballot, pre-application discussions continue to progress with LBB and the GLA, with the intention of submitting a planning application later in 2020. Home Group is supportive of the principles and objectives of the draft Local Plan as a whole, which look to meet the future needs for new homes, jobs and infrastructure. The Douglas Bader Estate falls within the Colindale Growth Area, which is covered by draft policy GSS06. The draft policy notes that the Colindale Growth Area has capacity to deliver 4,200 new homes between 2021 and 2036 (excluding the homes to be created through the regeneration of the Grahame Park Estate which is covered by draft policy GSS10). As highlighted through pre-application discussions with LBB, the Douglas Bader Park Estate has the potential to deliver circa 750 homes. This represents an uplift of circa 478 new homes which equates to 11% of the 4,200 minimum total homes expected to be provided within the Colindale Growth area as set out in the draft policy. We propose that an addition is made to the draft policy to reference the future regeneration of Douglas Bader Park Estate given the significant contribution it will make to the targets set out in the draft policy. Proposed amended wording to reflect this change is enclosed at Appendix I as tracked changes. As set out above, residents of the estate voted overwhelmingly in favour of its regeneration to provide new, high quality homes for the future. The principle of regeneration is also supported by both LBB and the GLA as demonstrated through pre-application discussions. Accordingly, to reflect this support and the significant provision of new homes that the regeneration of the Douglas Bader Park Estate will provide it is suggested that a site allocation should be introduced within the draft plan. On this basis, a suggested draft site allocation is enclosed at Appendix II which reflects the pre-application discussions held between Home Group, Hill and LBB to date.</p>		
HADAS	Site 11	KFC/Burger King Add: CDH08 Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
Historic England	Site 11	The development of this site has the potential to impact upon the Roe Green Village Conservation Area to the east, and the Buck Lane Conservation Area to the south both of which lie in neighbour Brent. Tall buildings have a much wider impact that needs to be considered. The Watling Estate Conservation to the north, within Barnet, should also be specifically mentioned in the policy as the development also has the potential to impact upon its setting. Careful design and massing could minimise or mitigate impacts. Again, the Character Appraisals for these conservations areas should form part of the evidence base, and where key views are identified in the appraisals they should be specifically mentioned so that it is clear to applicants and decision makers what parts of the site will have the highest heritage sensitivities.	Agreed	Yes
Mayor of London	Site 11	Welcome optimising development on this site and the development of the car park	We welcome this support	No

LB Brent	Site 11 and Site 12	Given the significance of A5 Edgware Road as a movement corridor, it would be helpful if the policy provided greater clarity on the need for development to provide an active ground floor frontage along it. Early engagement with local Brent councillors is encouraged in any emerging development proposals. Initial Planning considerations – add: “Development should positively address the Edgware Road and provide an active ground floor frontage along its length.	Agreed. This will be reflected in our Statement of Common Ground	Yes
HADAS	Site 12	McDonalds Restaurant Add: CDH08 Add: This large development site should be the subject of an archaeological assessment.	Agreed.	Yes
Mayor of London	Site 12	Welcome optimising development on this site and the development of the car park. The re-provision of car parking should be minimised and not exceed the standards set out in the Intend to Publish London Plan	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 13	Add: CDH08 Add: This large development site should be the subject of an archaeological assessment.	Agreed.	Yes
Environment Agency	Site 13	Should acknowledge the part of the site close to the Silk Stream is also in Flood Zone 2 and 3b (functional floodplain, the zone comprising land where water has to flow or be stored in times of flood). If the site passes the Sequential Test for the Local Plan, a Level 2 SFRA needs to inform the planning considerations, specifically flood risk mitigation measures required. The sequential approach should be applied on site to ensure the more vulnerable uses are located in areas of lowest flood risk within the site. Should be a requirement for a minimum 10 metres (or wider) green buffer zone from the edge of the Silk Stream main river. Tall buildings should be located away from the Silk Stream River Corridor.	Agreed	yes
Environment Agency	Site 14	Reference that the majority of the site is within Flood Zone 2 and parts of the south within Flood Zone 3b along the Silk Stream River Corridor. Indicate the site is located within 1 kilometre of the Brent Reservoir SSSI. If the site passes the Sequential Test for the Local Plan, a Level 2 SFRA needs to inform the planning considerations for this site, specifically flood risk mitigation measures required. The sequential approach should be applied to ensure the more vulnerable uses are located in areas of lowest flood risk within the site. There should be a requirement for a minimum 10 metres (or wider) green buffer zone from the edge of the Silk Stream main river. Tall buildings should be located away from the Silk Stream River Corridor to avoid shading and lighting impacts. Proposals should also avoid harm to the Brent Reservoir SSSI.	The Council has resolved to grant planning permission for this site (planning ref: 19/4661/FUL). The assessment provided in support of the application concluded that for fluvial risk for up to the 1 in 100-year flood event the existing flood defences would be sufficient, according to flood modelling completed by the EA. The assessment of existing surface water flood risk at the site is generally very low, although with some areas of higher risk – this will be managed through a surface water drainage strategy incorporating SuDS.	Yes
Canal & River Trust	Site 14	Likely to have significant impact on adjacent section of Silk Stream, which feeds into the stretch that the Trust owns and manages, between the A5 road and the Brent Reservoir itself. Support the requirement for the site development to avoid harm to the adjacent SINC, and include improvements to Silk Stream River Corridor.	Update with reference to planning consent	Yes
Mayor of London	Site 14	Welcome optimising development on this site and the development of the car park.	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
Natural England	Site 14 & 63	given their location adjacent to the SSSI, should ensure appropriate SuDS measures within the developments. They should also ensure there is no inappropriate access from the developments onto sections of the SSSI that are not formal paths/ recreation areas.	Site 14 has been revised as it is adjacent to the SSSI	Yes
Thames Water	Sites 1, 3,4,15 to 26,31 to 52, 54 to 60, 64 to 67	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	We welcome these comments from Thames Water	No
Theresa Villiers	Site 15	Already a proposal to develop 204 homes at Colney Hatch Lane so further 397 at Tesco site would be excessive increase in population in the area.	The timeframe for any development through this proposal is not expected in the early stages of the	No

			Plan. If the planning consent is implemented for the development at 231 Colney Hatch Lane, new residents will be well established before any development at Site 15. Contributions from development through S106 and CIL will help fund improvements to infrastructure and enable integration within this area.	
Environment Agency	Site 15	A small section along the southern boundary to west of the site adjacent to Pinkham Way, is within Flood Zone 2 and 3. In addition, the Bounds Green Brook runs underneath the site close the Pinkham Way in culvert and is designated main river. If the site passes the Sequential Test for the Local Plan, it would be advisable to include this site within the Level 2 SFRA, to assess the detailed nature of the flood risks and the impact from climate change. The site requirements should include consideration of de-culverting of the Bounds Green Brook and inclusion of an appropriate buffer zone either side of the main river. Under no circumstances should built development be allowed on top of the culvert, and access should be maintained along the entire length.	Agreed	yes
Mayor of London	Site 15	Welcome optimising development on this site and the development of the car park. The re-provision of car parking should be minimised and not exceed the standards set out in the Intend to Publish London Plan	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
Mayor of London	Site 17	Barnet should ensure there is sufficient educational capacity in the area and that this site is no longer required for education use. Barnet should ensure there is sufficient open space and outdoor recreational facilities in the area before the redevelopment of this site	This site has now been removed	Yes
Chassay+Last Architects	Site 17	Concerns that 148 units is unrealistic for this site and asks if there is a confusion between 'units' and 'habitable rooms' and states that the end of Park Road is a leafy road of generally 2 storey houses and bungalows with large front and rear gardens.	This site has now been removed	Yes
East Barnet Residents' Association	Site 17	This is not acceptable: Building on this open space is contrary to Policy ECC04.	This site has now been removed	Yes
CPRE	Site 17	We support the retention of this green space, which should be used for community and public use and to prevent further disuse of the green space.	This site has now been removed	Yes
East Barnet Residents' Association	Site 18	May be acceptable if community use is retained as described.	Agreed	No
Elizabeth Silver	Site 18	Change to be made: No residential capacity. Facilities retained. Lack of library facilities hinders social mobility as lower income groups increasingly do not have space to store books, nor money to buy them, thus impacting on the next generation's future earnings	Library has been re-provided in New Barnet Leisure Centre	No
Mayor of London	Site 18	Welcome the requirement to replace the community use, where there is demand	We welcome this support	No
East Barnet Residents' Association	Site 2	Update to 1,350 units following the developers winning the appeal. It is contrary to many of the Local Plan policies	Agreed	.Yes
Cromer Homes	Site 2	With reference to draft Policy CDH04 the approved scheme would be defined as comprising tall buildings (8-14 storeys) and it is confirmed in the assessment of the site (Site 2) that tall buildings are appropriate in this location. This is reiterated in draft Policy CDH04 which identifies some 9 locations where tall buildings are considered to be acceptable, this includes 'New Southgate Opportunity Area' (NSOA) (Policy GSS09). In the light of the decision to approve buildings in excess of 8 storeys, the site should be confirmed as being located within the NSOA and suitable for tall buildings. There should be a corresponding change to Site No.2 to increase the residential capacity that the site can accommodate, which would be reflective of the site's location within an Opportunity Area. The site is capable of	While the NSOA boundary has not been defined, the Council does not consider the outcome of the appeal decision as providing direction for drawing such a boundary, or as grounds for this site to be included as a location suitable for tall buildings. Schedule revised to reflect the appeal decision and reference 1,350 units. The site schedule should not support a higher	Yes.

		accommodating a greater quantum of residential development within the range for tall buildings (up to 14 storeys). The site could accommodate an uplift in residential units, which would be reflective of its location within an Opportunity Area and already being considered as suitable for tall buildings. The site description for site No.2 should be revised to reflect its capacity to accommodate a greater quantum of residential development. The indicative residential capacity should be described as: <u>At least 1,350.</u>	indicative figure, in particular one based on higher building designs.	
Mayor of London	Site 20	Welcome the re-provision of the community facilities	The Council welcomes this support	No
St William Homes LLP	Site 21	Supports principle of residential uses for Site Allocation 21 'New Barnet Gasholder'. In line with the Mayor's design led approach and for sites to be optimised, the allocation should replace the word 'indicative' with 'minimum of'. The inclusion of '10% community uses' is too onerous and is not based on evidence; to enable flexibility when the site comes forward, the Site Allocation should state that a small element of non-residential uses could be considered.	Proposal revised. The community uses are to address the potential needs of new residents in a large scheme, for example a creche.	No
Mayor of London	Site 21	This site is a non-designated industrial site, but is allocated as Opportunity Site 1 in the New Barnet Town Centre Framework 2010	Proposal reflects National Grid's intention to bring forward the redevelopment of this remaining part of the gas works	No
National Grid Property	Site 21	We wish to confirm that it remains our client's intention to bring forward the redevelopment of this remaining part of the gas works and that the current development programme is likely to bring development forward slightly in advance of the timeframe set out in the local plan. Whilst the precise number of dwellings will need to be confirmed through a detailed architectural feasibility assessment, we consider that the 190 units proposed provides a reasonable estimate of the site's development capacity.	The Council welcomes this support	No
Mayor of London	Site 22	Welcome optimising development on this site and the development of the car park. The re-provision of car parking should be minimised and not exceed the standards set out in the Intend to Publish London Plan	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 23	This large development site should be the subject of an archaeological assessment.	Agreed	Yes
Historic England	Site 23	While we welcome the provision of the policy to protect the setting of the listed building we advise that the policy should be more detailed. We recommend that both listed structures are identified within the policy. The listed buildings and general character of the area is sensitive to increases in building heights above the established levels and so we recommend that the policy specifies this, the rear of the site is likely to have the lowest heritage and townscape sensitivities. The policy should explicitly require the listed buildings to be retained. <i>(more detail is provided in the response)</i> There is some concern that the site capacity of 25 units could not be achieved on the site without causing harm to the setting of the listed building.	Agreed	Yes
Mayor of London	Site 23	Welcome the retention of the community use	The Council welcomes this support for re-provision of community facilities	No
Historic England	Site 24	<i>Detailed description of historic features of station provided in response.</i> Given this, the development will need to be carefully planned to ensure that the arrival to and entrance of the station is not obscured or impacted upon. This part of the site is likely to be the most sensitive and perhaps the policy should specify mitigation measures such as requiring this part of the site to be landscaped or kept open. The separate residential access along Diploma Avenue to keep the station entrance approach could be helpful in securing this heritage mitigation. The policy considerations could be expanded upon to make this point. There may be opportunities to secure heritage benefits to the historic fabric of the station via the development of this site e.g. concrete repairs, or signage. We note that the Tall Buildings Update (2019) identifies East Finchley as a low rise area with a village type character which does not lend itself to greater intensification via tall building height. We request that this is specified in the policy as specific planning consideration in relation to Site 24.	Height context added as part of the planning description	Yes
Lindsay Wittenberg	Site 24	I wish to strongly oppose the proposed change of use from public car parking to residential-led with 30% retail and public car parking. The car parking currently available at East Finchley station is the only	The site lies partly within, and partly adjoining, East Finchley Town Centre and is highly accessible by	Yes

		public car park in East Finchley, serving a broad and extensive clientele, including commuters who depend on the car park for their livelihoods. Even now the car park is not adequate to the demands placed upon it - and 30% retail and public car parking would reduce the available car parking to a fraction of what it now is. We most certainly do not require any more retail outlets in East Finchley as the High Road is more than adequate. The proposed development across the road from the station offers a significant challenge to car parking, besides which the low rise nature of East Finchley buildings currently maintains its distinctive character. It is critical for the amenities, wellbeing and character of East Finchley that the public car park as it now stands remains exactly as it is.	public transport. It is therefore appropriate to promote sustainable development that serves the town centre and promotes housing delivery. This includes ensuring that in considering any proposal for development public car parking requirements must be assessed and re-provided as needed.	
TfL CD	Site 24	Development timeframe could be brought forward to 5-10 years, or possibly within the next five years, subject to feasibility and viability. seeking assurance that the Council would not prevent proposals coming forward within a shorter timescale. It is not clear whether the "30% retail and public car parking" refers to site area or floorspace and this should be clarified. TfL is unlikely to come forward with a scheme that provides significant car parking in this highly accessible location (except for provision for people with disabilities); therefore, we suggest amending as follows: " <i>Proposed use type/s: residential-led with 30% retail to enhance the town centre and public car parking for people with disabilities only</i> "	Proposal revised	Yes
Combined Finchley LLP	Site 25	The draft allocation refers to residential use only, however it occurs to us that because of the centre's organic 'high street' arrangement, there are few if any site opportunities for development to significantly enhance the centre's vitality and viability. The Council will acknowledge that the draft Spatial Strategy for Barnet (Policy BSS01) seeks up to deliver an additional 67,000m ² of office space and 110,000m ² of retail space across the borough's town centres over the plan period. The site could assist in meeting this requirement through an element of non-residential uses, given that it is on the edge of East Finchley District Town Centre, less than 100m from the Underground Station, and forms part of a small cluster of non-residential uses on the north side of the Great North Road, south of the railway line. Therefore we suggest that the 'Proposed use type/s' entry is modified to: " <i>residential and/or main town centre uses</i> ".	East Finchley Substation site is outside East Finchley town centre therefore the Local Plan does not promote main town centre uses at this site. It is acknowledged that the site has constraints in terms of noise and vibration from the adjacent Northern Line. These can be mitigated by a well designed residential scheme in a location within 100m of East Finchley Station. There is potential for a small element of office space as the commercial use, subject to the sequential test	Yes
Combined Finchley LLP	Site 25	Exploration of Building Retention Potential: We understand that TfL have given this principle further consideration since the 'Call for Sites' entry. Whilst the substation function has long since ceased, the building continues to act as the retaining structure for this part of the railway embankment. However we understand that this is becoming increasingly impractical from a maintenance perspective. Consequently, a condition of the land sale will be that a new independent retaining wall is to be erected against the embankment with a three metre separation for maintenance access for TfL. Hence the loss of the majority of the existing building is inevitable, such that there would appear to be little point in seeking to retain what little may be left over (with the consequent structural implications), and hence the allocation should anticipate complete redevelopment of the site. Of course, any replacement building would continue to need to be respectful of the adjacent heritage assets.	See response above	Yes
TfL CD	Site 25	Suggest this housing allocation is widened to also include potential for commercial uses, particularly at ground floor level which, due to site topography (the embankment behind) may not be best suited to housing. Commercial use would also accord with the garage and office buildings adjacent and enhance the town centre. The existing structure does not lend itself to residential conversion or the density of development which is sought. Therefore, suggest this is deleted from the allocation as it is likely to be unfeasible.	See response above	Yes

HADAS	Site 26	Add: This large development site abuts a proposed new APA and should be the subject of an archaeological assessment.	Agreed	Yes
Michael McGrath	Site 26	I am concerned at the touting of the Park House site (N2) to developers with the potential for 42 flats and with 30% of the site given over to a community facility. This implies a very tall building which would have to be very close to neighbouring buildings. I note the plan shown in the document shows the Park House site includes the neighbouring site at 12-18 High Road for which planning consent has been granted for 24 flats and an office building. Was this deliberate or an error? I would also ask that the Council give some consideration to the impact of planning policies where the development site is within a designated town centre. In practice the rules regarding separation of buildings within the town centre are applied even though the neighbouring buildings are outside the town centre. This is grossly unfair and something that should be clarified in future iterations of the planning guidance.	Proposal revised	Yes
Mayor of London	Site 26	Welcome the requirement to replace the community use	The Council welcomes this support for re-provision of community facilities	No
HADAS	Site 27	Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
Aberdeen Standard Investments	Site 27	The proposed uses are unnecessarily prescriptive and somewhat arbitrary. ASI request the text is amended as follow: " residential with 25% retail, office, leisure and community an appropriate provision of town centre uses " ASI capacity work identifies in excess of 2,500 residential units for The Broadwalk Centre alone. When combined with the Forumside site, Site 27 has the capacity to deliver considerably in excess of 2,379 new homes. A higher figure of a minimum of 3,500 residential units would more appropriately reflect the site potential.	Delivery of town centre uses are critical for this site. Specifying what these should include, along with a broad indication of the quantum of non-residential uses, is key to ensuring the ongoing vitality and viability of the town centre. Sites Schedule format updated to more accurately provide a indication of the potential mix of uses The number of units is indicative, and is based on site area, PTAL and context. Other town centre uses must also be delivered on this site and a higher figure as a minimum would therefore be inappropriate.	No
DN Capital Property Ltd	Site 27	Support proposed allocation and the indicated land uses in principle. Para127(e) of the NPPF, London Plan Policy 3.4 and draft London Plan Policy D3 all outline the importance of site optimisation through appropriate, contextually specific densities. Therefore reiterate the importance for the development potential of individual sites within the Growth Areas to be fully explored and the potential to be optimised. Railway Hotel itself should also be included within the Edgware Town Centre allocation. The site provides the opportunity to deliver a significant quantum of residential development and desirable non-residential uses to improve the vitality of Edgware and enable the refurbishment and viable long term use of the Railway Hotel itself. The site is available for development in the short-term, and can be brought forward independently of the wider allocation. It is important that individual sites do not prejudice the redevelopment of the wider area but that policy allocations do not stop individual sites coming forward independently.	The Council welcomes these comments. The Local Plan supports density optimisation within the context of protecting amenity and heritage assets. This is consistent with NPPF and London Plan policy. The Council is entirely supportive of the refurbishment of the Railway Hotel but does not consider extending the site boundary to include it is necessary to ensure an appropriate outcome for this important heritage asset. The Council wants the Railway Hotel to be returned to a suitable use that preserves the Grade II listed building and ensures the use is appropriate to its heritage and community status.	Yes -
TfL	Site 28	Bus operations and the function of the bus station should be protected or re-provided as part of any redevelopment	Agreed	Yes
Mayor of London	Site 28	Bus operations and the function of the bus station should be protected or re-provided as part of any redevelopment	Agreed	Yes
HADAS	Site 28	Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
CPRE	Site 28	This site is adjacent to Deans Brook: any development should not encroach onto this green space.	The area around Deans Brook and the south eastern part of the site is classified as a Site of Borough Importance for Nature Conservation. Site 28	Yes

			guidelines have been updated to clarify that the SINC should preserved.	
Environment Agency	Site 28	Flood Zone 2 and 3 overlaps the north eastern boundary of the site in places. There is some surface water flood risk. If the site passes the Sequential Test for the Local Plan, advise including this site within the Level 2 SFRA to assess the detailed nature of the flood risks and the impact from climate change. The site requirements should include consideration of de-culverting of the Deans Brook and the inclusion of other river enhancements and an appropriate green buffer zone either side of the main river. No development should be allowed on top of the culvert and access should be maintained along the entire length.	Agreed	Yes
HADAS	Site 29	Add: CDH08 Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
CPRE	Site 29	This site is situated in the Green Belt. The site allocation document states the site is previously developed however it is clear that the site is a cleared hardstanding section of land and should not be classified as 'previously developed'. Therefore, we object to further encroachment into the Green Belt on this site and do not support development here, in particular because paragraph 10.5.24 in the Regulation 18 document states that the Barnet Green Belt and Metropolitan Open Land Study has found that all existing areas of Barnet's Green Belt meets one or more purposes set out in the NPPF	Any future development proposals that come forward for this site will be considered in accordance with NPPF paragraph 133 to 147.	No
Mayor of London	Site 29	Welcome the continued waste use. The on-going operations should preserve the openness of the Green Belt and not harm the nature conservation sites near by	The Council welcomes this support.	No
Thames Water	Site 3	A critical trunk sewer runs through/close to this site which would need to be considered.	Proposal revised	Yes
Environment Agency	Site 3	Site description needs to include that the majority of the site is in Flood Zone 2. If the site passes the Sequential Test for the Local Plan, a Level 2 SFRA needs to inform the planning considerations for this site, specifically flood risk mitigation measures required. Include a requirement for a 10m green buffer zone from the edge of the Pymmes Brook to the development, and consideration of river enhancement measures.	Agreed	Yes
Mayor of London	Site 3	Welcome the requirement to replace the community halls, where there is demand. Welcome requirement that MOL is not developed	The Council welcomes this support for re-provision of community facilities	No
East Barnet Residents' Association	Site 3	May be acceptable if the parking, access and community use are retained as stated.	The Council welcomes these comments	No
CCI London Community Church	Site 3	Barnet's Local Plan is disproportionate as it appears not to take into account the best interest for the current residents and local area and the disruption that it will create for the community if the Old Veterans Hall is demolished to give way for new developments to be built in that same space that is currently being used thoroughly by the Barnet residents and that benefits the community greatly as is where the CCI London has been established for the past 12 years, giving the community an inclusive Christian Church that has been supporting the local community and where people can belong, contribute and thrive. Part of the things we will lose as a community if the local plan goes ahead (as it is currently stipulated to demolishes the Old Veterans Hall), CCI will force to stop serving nearly 250 people on a weekly basis, that is approximately 100 households and families mostly from Barnet that will no longer have this space that allows them to be part of a long standing community that benefits the Barnet residents. We have regular meetings, gatherings and nearly every week we have a communal event. For the above reasons, we are making this formal representation to object the local plan with regards to the old veterans Hall located on Osidge Lane N14 5DU. We want the council to know that our community wants to do everything possible to avoid getting the site demolished. We also want for the council to see how relevant and important the old veterans Hall is for the community and the work that CCI London has done for the residents of Barnet from these premises. At this moment we believe that Barnet's local plan is not taking into account the impact of their decision on the local residents and	The Local Plan supports re-provision of a community use if this site is subject to re-development. The Council as landowner will work with existing occupiers to ensure they find new accommodation either within the redeveloped site or an alternative location in a town centre which is more capable of serving local catchment needs by sustainable travel modes.	No

		everyone else that belongs to CCI community will have , if the Old Veterans Hall is demolished , What is more we need to make sure that Barnet council understands the importance of the work done in this particular site.		
Theresa Villiers	Site 3	Existing building on this site should be retained for use by the Community Church.	The Local Plan supports the re-provision of a community use if this site is subject to re-development. The Council as landowner will work with existing occupiers to ensure they find new accommodation either within the redeveloped site or an alternative more sustainable location such as a town centre within Barnet.	No
CCI London Community Church	Site 3	Osidge Lane, Community Halls – current use – non-residential uses. Evidence to be provided that the community halls are no longer required – the community halls are used daily with additional occupation during the weekends and the ‘Scouts hut’ now also being used too. Council assets disposal programme – the site is not for disposal as it is in constant use, and in need to extension due to the increased use as a key community hub with various events being hosted and opened to the wider community. ‘Proposes use type/s:’ to be further elaborated upon and explained how the area can be reduced to 75% community use and how this impact and will be impacted upon by the proposed residents as well as the developers. With consideration of the environment and climate change – how will the increase of resident’s impact on the local park and water way, as well as strain on the current levels of parking. What considerations have been taken to properly reallocate any current residents and lease holders of the current community halls?	This site has been put forward as part of the Council’s Assets Disposals Programme and Site 3 as set out in the Local Plan. The Council will work with existing occupiers to either accommodate in new development or help find suitable premises elsewhere. There are no existing residents on Site 3	Yes
HADAS	Site 30	Add: Part of the site lies within an Archaeological Priority Area (APA) and will require assessment.	Amend	Yes
Taylor Wimpey and TfL	Site 30	The proposed 50% non-residential uses do not reflect the emerging development proposal and methodology behind this statistic is unclear. The emerging proposals include an appropriate mix of uses and level of commercial space which has been informed by extensive pre-application discussions with the Council and need to complement the surrounding town centre. It is not appropriate for 50% of the proposal to be non-residential uses; this is unviable and require substantial amounts of non-residential uses on the upper floors of the scheme. It would significantly reduce residential capacity (including affordable homes). It is not possible to provide the stated 556 new homes and meet the 50% non-residential uses target without substantially increasing the proposed massing of the scheme. Request the next iteration of the site allocation omits reference to a percentage of non-residential uses and instead states that consideration should be given to providing non-residential uses at ground floor to help activate the scheme. Further flexibility should be included within the allocation with estimated capacity increased to c.600 homes This is an accessible brownfield sites and is adjacent to an existing transport hub within the town centre. This is the type of site which the Barnet Growth Strategy (2019) envisions coming forward to optimise housing development. The draft Local Plan defines tall buildings as 8 or more storeys. Any redevelopment scheme that fails to include a tall building of 8+ storeys would fail to make best use of this valuable brownfield land and would not comply will draft London Plan policy D3 (optimising site capacity through the design-led approach). Request that the Site Allocation is more positively worded and is amended as follows: “ <u>tall buildings are appropriate within the site allocation and ‘very tall’ buildings may also be suitable, subject to a detailed townscape and visual impact assessment and meeting the criteria set in draft policy CDH04.</u> ” Should be seeking to reduce and remove car parking within the Borough as part of a response to the Climate Emergency and need to create healthy streets. The wording should be amended so that it reflects this objective and positively supports a reduction. An amendment is requested as follows: “ <u>the loss of public car parking spaces as part of the redevelopment is supported where the proposal improves sustainable modes of transport and has helped mitigated adverse impacts.</u> ” The site plan for the emerging	The 50% includes those parts of the site retained for other uses including a significant portion being for ongoing transport use such as the tracks and station. The elements of office and retail in the proposed scheme will therefore form a much smaller proportion of the overall quantum of development. The Sites Schedule format has been updated to more appropriately describe the potential mix of uses. Proposed higher figures would need to be justified on design. The wording reflects that, while tall buildings may be appropriate in Finchley Central, proposals must demonstrate they meet the required criteria. The site itself is lengthy and varies considerably in character and context; tall buildings would therefore not be appropriate in all parts of the site. The Local Plan supports and encourages sustainable modes of transport while recognising that some car parking may continue to be required. The Council’s approach requires reductions in car parking to be justified.	Yes

		development proposal has been amended since the 'Call for Sites' consultation in 2019. TW/TfL request that the draft site allocation boundary is updated accordingly.		
Caroline Thomas and Bob Ganly	Site 30	The proposals for Finchley Central, with its loss of commuter car parking spaces will make it very difficult for people in the area who work in Central London to drive to the station. The area needs more rather than less car park space. The plan will also add to congestion in the vicinity	The Council wants to reduce car usage and make more efficient use of land used for surface level car parking.. People living in the area should not be driving to the station when other more sustainable choices are available. The Council wants to reduce car usage.	No
TfL CD	Site 30	Feasibility work to suggests residential capacity of 556 should be achievable. However, to optimise housing delivery suggest this figure is raised to 600 Suggest the refence to "50% mixed uses" is removed from the allocation as it would not be achievable in terms of floorspace. References to car parking and office floor space should be deleted: " Proposed use type/s: residential-led with 50% mixed uses (transport and town centre uses to strengthen the high street including retail, and food and beverage, and public realm / open space. , retail, offices, car parking) " TfL intends to retain the southern end of the existing car park for operational purposes along with land located to the north of the line to Mill Hill and the south west of the line to High Barnet. The boundary should therefore be revised. The allocation should clarify that the site is suitable for tall and very tall building/s. This would accord with draft NLP and Barnet planning policies and the town centre. Description of surrounding context should also refer to other nearby taller buildings on the high street including the Travelodge hotel (six / seven storeys) and Gateway House (eight storeys). The existing station building has been locally listed and TfL has no plans to redevelop the station buildings which provide 'step free access' to the platforms and adequate capacity. Agree that development proposals should consider how it can support improved access the station and increase its presence on the high street. Suggest rewording: " Comprehensive residential led development with a new station interchange and improved access to the station from Regent's Park Road and -Development should enhanced visual and functional connection between station and town centre." Modify car parking references: " For any loss of car parking spaces an assessment must be undertaken and mitigation provided to encourage the use of public transport and active modes of travel. replacement spaces may be required. " Reduce the development timeframe to 0-5 years - aim to have planning permission in place to commence development by March 2021. The programme for delivery of the whole site is likely to be approximately seven years.	In addition to the response above to Taylor Wimpey. Site description updated to reference other significant buildings on Ballards Lane and that the station building is locally listed and should be retained. Also reference added to step free access and proposals improving access to the station and its presence on the high street. The Local Plan supports and encourages sustainable modes of transport while recognising that some car parking may continue to be required. The Council's approach requires reductions in car parking to be justified. The timeframe shows when the scheme is expected to be completed. As such, a seven year build out places the scheme within the 5-10 year timeframe.	Yes
Finchley Society	Site 30	The development of the land around Finchley Central Station is currently the subject of consultation. The Finchley Society's views are being made known through that process. The emphasis of the "Initial planning considerations" in the Draft Plan is generally welcome. We view as positive: (a) the linking of the visual and functional connection between station and town centre, (b) the retention of a continuous active and attractive frontage along the main road, (c) provision of flexible workspaces and use by SMEs, (d) restrictions on the design due to its proximity to the Finchley Church End Conservation Area, (e) the need to respond to the 'Finchley vernacular' style of surrounding buildings (which is done by existing developments such as Gateway House which includes the Finchley Church End Library). We disagree that Finchley Central is an appropriate location for tall buildings of over 8 storeys (despite the existence of the 9-storey Central House). This is a narrow segment of roadway, and even narrower pavements. Development of tall buildings on either side would create a canyon effect with unacceptable lack of light and views at street level. It is an area of established architectural character, and of a significant number of recent developments in the 5-7 storey range that set a good precedent. The town centre should be developed on the basis that the maximum acceptable height is 8 storeys. The commercial and housing aims of the development can be achieved by careful apportionment of the 8 storey maximum across the whole site.	We welcome support for the initial planning considerations. Finchley Central town centre was identified in the 2012 Local Plan as a location where tall buildings may be supported	No

Thames Water	Sites 24, 26, 31, 35 to 42	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	We welcome these comments from Thames Water	No
HADAS	Site 31	Add: CDH08 Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Agreed	Yes
TfL CD	Site 31	Previous use of the site was residential; houses were acquired by DfT for a road widening scheme that was never brought forward. TfL had to demolish most of the homes on the site after they were vandalised and became unsafe. A synagogue occupies the two remaining houses on a short lease as a 'meanwhile use' prior to the site being comprehensively redeveloped. TfL initial feasibility work indicates site capacity for a minimum of 50 new homes and the indicative residential capacity should therefore be raised. This site could be developed within a five-year timeframe and the Development timeframe should be amended to reflect this.	There are significant constraints in terms of mitigating noise and air pollution from the adjacent A406 road. Access is also a major constraint, including for public transport, private cars, and delivery of essential services. Raising the indicative residential capacity is therefore not considered to be appropriate. Timeframe revised	Yes
Catherine Oliver	Site 32	I am e-mailing as a resident of manor park road to object to this plan we already have significant difficulty parking on our road without extra houses and less parking!	The requirement to undertake an assessment of car parking needs and provide replacement spaces as required is a planning consideration for the site.	No
Stuart Thomson	Site 32	We wish to object in the strongest possible terms to one of the changes in use proposed in Site 32. This site is not suitable for housing as is proposed. The site is currently used predominantly as a much needed car park for local residents. The site was, according to long term residents, made a car park when the middle section of Manor Park Road was pedestrianised to prevent 'rat running'. These spaces were allocated to those residents who lost the spaces on the pedestrianised area. Parking in the area is already a problem especially when there are events taking place at the Bishop Douglass school. To remove the current spaces (approx 14) and then to add at least 7 extra cars to the numbers looking for spaces would be too much of a burden on Manor Park Road, Hamilton Road and Brackenbury Road. That will make an extra approx 21 vehicles seeking spaces on already crowded roads. No assessment has been made regarding the impact on parking or on traffic flows around these three roads. Sadly, Barnet Council has long neglected maintenance of the carpark and the small park at the back of the carpark. There is some anti-social behaviour that takes place in the park which has caused some residents distress. However, that should not be viewed as reason enough for the Council to seek a change of use. Instead, the area should be properly maintained by the Council. One could suggest that it has been deliberately rundown to act as an excuse to justify the proposed change of use. Furthermore there are significant flaws in the way in which Barnet Council has undertaken this consultation: 1) Not all affected residents received the consultee letters (Dated Jan 2020) 2) It was incredibly difficult to find the proposal from the information detailed in the letter and took lots of clicking on links and scrolling. (the Planning Consultation page and Engage Barnet sites were given but it was not straightforward to find the details from those pages.) 2) If you did actually manage to find the proposal, the car park was listed as being in the Golders Green ward - this is false, it is in the East Finchley ward. This 'hides' the information making it difficult for affected local residents to know that a change is even being proposed.	The requirement to undertake an assessment of car parking needs and provide replacement spaces as required is a planning consideration for the site. The consultation letters relating to the 'Schedule of Site Proposals' were sent to those addresses within 100m of the sites. The list of sites table at 15.4 has been revised to reflect the correct ward for Site 32.	Yes
Matt and Geetha Beaven	Site 32	We would like to object to the changes proposed in the above plan. The site is currently used predominantly as a car park for local residents. Changing it to housing would lead to the street being overloaded with cars – 14 spaces would disappear, while new residents would put additional strain on parking spaces.	The requirement to undertake an assessment of car parking needs and provide replacement spaces as required is a planning consideration for the site.	Yes

		The site was originally made a car park when the middle section of Manor Park Road was pedestrianised to prevent traffic short cutting through the street. Parking in the area is already a problem especially when there are events taking place at the Bishop Douglass school, and with an increasing number of its pupils driving cars and parking in the residential area. There seems to be no apparent assessment or regard for the impact on parking or on traffic around Hamilton Road, Brackenbury Road and Manor Park Road. We live directly opposite the car park. Behind it is a very small park which – if properly maintained by Barnet Council – would provide a great outlet for the many young children in the street and a much needed spot of green space in a very built up area. I've not seen any maintenance here in the last few years. Perhaps it has been deliberately run down to assist the proposed change of use? I should also point out that the we never received the consultee letter and it was almost impossible to find the proposal in the report as it was filed in the wrong place – (it was listed in the Golders Green ward instead of East Finchley). Again, have things been deliberately hidden?	The consultation letters relating to the 'Schedule of Site Proposals' were sent to those addresses within 100m of the sites. The list of sites table at 15.4 has been revised to reflect the correct ward for Site 32.	
Sylvie Clarke	Site 32	I would like to object to the proposal to build housing on our car park area. Our area is congested enough without losing those spaces and adding yet more cars. Those car spaces were a vital part of the plan, a prerequisite, when the pedestrian area was paved over. We need space to park and the green area to provide oxygen and to nurture wildlife.	The requirement to undertake an assessment of car parking needs and provide replacement spaces as required is a planning consideration for the site.	No
Mayor of London	Site 32	Welcome the redevelopment of the car park	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
Langley Park Residents' Association	Site 33	No indication how the footprint, placement and height of any building is calculated. Concerned that a building on the car park could seem overbearing when viewed from Langley Park and that many properties would suffer from loss of natural light. Properties at the top end of the road could also be overlooked. Air and noise pollution should be an important factor for locating any residential dwelling so close to motorways, roads and railway. Langley Park has a lack of parking spaces in the road due to the proximity to both the town centre and the railway station. A plan is needed to avoid Langley Park being used as an overflow car park for any development; e.g. modification to the current CPZ such as having a one hour restriction both in the morning and afternoon. Note that the Bunns Lane car park is not just for those using the station but it also serves for those who want to make use of the facilities in Mill Hill Broadway Town Centre - in previous documentation Bunns Lane car park is referred to as the Shoppers' Car Park. Loss of car parking could be detrimental to the Town Centre. Suggest a change to the site description as follows: <i>Comprising the car park (184 spaces) for Mill Hill Broadway Station and the Town Centre. The car park is also used when Saracens are playing at home. The site is immediately adjacent to the Midland Main Railway on the eastern boundary, with the raised M1 carriageway immediately beyond. Mill Hill Broadway town centre is immediately to the east to the east. To the west is low-rise housing.</i> There is an entrance to the station from the car park. Loss of such an entrance would be inconvenient for those pedestrians approaching the station from Bunns Lane either by foot or from the car park. Council failure to provide adequate and timely infrastructure and services to support new dwellings.	Further detail on massing has to be established through the planning application process. The impact on the amenity of neighbouring properties will be assessed and consultation carried out. Proposals must ensure noise and air pollution are avoided or mitigated. Public transport access in the area reduces the need for cars to use the station and local centre and the Local Plan supports more sustainable transport modes to reduce car use. Further consideration and enforcement of CPZs can be used to control on-road parking. Reference added to use of the car park for the town centre and for the Saracens matches and for development proposals seeking to maintain the access point to the Station. Chapter 12 of the Local Plan sets out how contributions from development can help fund infrastructure to support growth.	Yes
Caroline Thomas and Bob Ganly	Site 33	Again there is a need for more rather than less car parking capacity in the area, rather than less.	Increasing car parking spaces is not sustainable and not supported by the Council.	No
Roger Tichborne	Site 33	Effects of loss of parking provision on local roads, given the commuting patterns from Mill Hill Broadway. Inadequate parking provision for existing residents means any loss of parking is likely to cause additional problems. Barnet council admitted that the car park is now viewed as ancillary to the Station rather than as a necessary support for parking for the shops at Mill Hill. The logic for a hotel on the site is flawed. Unlikely that people using the hotel to visit central London will add much to the Mill Hill economy. There is already a very large hotel in Mill Hill at Scratchwoods Service Station. Would prefer	Public transport access in the area reduces the need for cars to use the station and local centre. Local Plan supports more sustainable transport modes to reduce car use. Controlled Parking Zones (CPZs) can be established and enforced by the Council to control on-road parking. The Council considers that a hotel could be a suitable use at this location, subject to the	No

		to see the access road opened up, with the restrictions for access to the M1 as a ratrun, moved elsewhere, so residents with visiting relatives can use the hotel easily.	specific proposal, and would benefit the local economy. The Scratchwood Services hotel and access road are distant from the site, being located approximately 2km away. Any changes to road access will be a matter for consideration by the Highways Department.	
Former MHNF	Site 33	With regards to 7.7.1 we agree that (see Site 33) a hotel with active frontages at ground floor level should be built on the Council owned car park off Bunns Lane at Mill Hill Broadway Station. A hotel together with the other facilities should be included in a viable scheme. The scheme should include a multi-storey car park (with a capacity for 500 cars and 250 cycles), which could convert partially to offices or residential if parking requirements reduce over time. A cinema, a Public House (strangely there is not one in our Town Centre), well sized retail units or offices and some residential units on top, would be a real game changer for the future of our Town Centre. It would attract visitors who would be pleased to stay in a decent hotel within a 20 minute ride from Central London, and one they could easily approach from the M1, M25 & A1. The Thameslink line could further attract people from Borehamwood, St. Albans, Hendon and Cricklewood to these new offerings. We fully support this development and looking forward to seeing it brought forward.	We welcome this support. However increasing car parking spaces is not supported by the Council.	No
Mayor of London	Site 33	Welcome the redevelopment of the car park. The re-provision of car parking should be minimised and not exceed the standards set out in the Intend to Publish London Plan	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 34	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Historic England	Site 34	There's a substantial amount of archaeological evidence within the surrounding area for both Roman and Medieval settlement. Although this site is not allocated for intense development we advise that the policy specifies the potential presence of archaeological remains and the submission of a desk based assessment upon application.	Agreed	Yes
Mayor of London	Site 34	Welcome the redevelopment of the car park	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 35	Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Agreed	Yes
LB Barnet Estates	Site 35	Capacity is identified as "23 (student halls of residence)". It states that "Accommodation will be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation". It is assumed that this means that the student room capacity is therefore 69 (23 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Middlesex University	Site 35	It is assumed that this means that the student room capacity is therefore 69 (23 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Mayor of London	Site 35	Welcome the redevelopment of the car park	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 36	Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Agreed	Yes
LB Barnet Estates	Site 36	Capacity is identified as "60 (student halls of residence)". It states that "Accommodation will be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation". It is assumed that this means that the student room capacity is therefore 180 (60 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Middlesex University	Site 36	It is assumed that this means that the student room capacity is therefore 180 (60 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes

HADAS	Site 37	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Middlesex University	Site 37	It is assumed that this means that the student room capacity is therefore 210 (70 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Mayor of London	Site 37	Welcome the redevelopment of the car park. The re-provision of car parking should be minimised and not exceed the standards set out in the Intend to Publish London Plan	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 38	Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Amend	Yes
LB Barnet Estates	Site 38	Capacity is identified as "84 (student halls of residence)". It states that "Accommodation will be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation". It is assumed that this means that the student room capacity is therefore 252 (84 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Middlesex University	Site 38	It is assumed that this means that the student room capacity is therefore 252 (84 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
HADAS	Site 39	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Mike Kintish	Site 39	I have a lease on 17a The Burroughs which is adjacent to the car park. I am a record producer and my business is located in 17a The Burroughs precisely because it is quiet and I am able to record sound. The studio is sufficiently soundproofed that it is protected from sound from the car park and road but I have a major concern that extended building work and drilling on the car park would mean I could not work from my premises for the duration of the build, which I suspect would be over a year at least. I understand the need for housing so I just want to raise my concern as it would seriously impact my business. I also see how full the car park is every day for use by residents and business merit holders such as myself and parking would need to be considered in the application.	Construction noise and disruption should be minimised through good site management and operation and construction activities should be planned to limit both the level and duration of noise. The requirement to undertake an assessment of car parking needs and provide replacement spaces as required is a planning consideration for the site.	No
Historic England	Site 39	As with site 34, there has been a substantial amount of archaeological evidence within the surrounding area for both Roman and Medieval settlement, including a Roman tessellated floor and a Roman burial urn. The policy should make provision for the presence of archaeological potential.	Agreed	Yes
Mayor of London	Site 39	Welcome the redevelopment of the car park.	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
East Barnet Residents' Association	Site 4	May be acceptable if the parking is retained or replaced (this is not mentioned) and library and health centre are retained or replaced as described.	Parking will be provided in accordance with TRC03	No
Mayor of London	Site 4	Welcome the requirement to replace the community facilities	The Council welcomes this support for re-provision of community facilities	No
Elizabeth Silver	Site 4	Change to be made: No residential capacity. Facilities retained at full capacity. Lack of library facilities hinders social mobility as lower income groups increasingly do not have space to store books, nor money to buy them, thus impacting on the next generation's future earnings. Health Centre even more important to retain than ever, in the face of increasing population.	The proposal requires library and health re-provision. This will be funded from contributions from re-development of this Council owned site. It is in the interests of the Council to generate income from this asset as well as deliver much needed new homes.	No
HADAS	Site 40	Site 40 Meritage Centre Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Middlesex University	Site 40	Assumed that this means that the student room capacity is therefore 108 (36 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Historic England	Site 40	Site lies in a highly sensitive location. Current building adds little value to quality of area so there is scope for enhancement, however it is crucial that any new development remains low rise. Site falls within an archaeological priority area (APA) and adjacent to the medieval church and burial ground. There is	Agreed	Yes

		substantial archaeological evidence for Roman and medieval activity both within the site and in the surrounding areas.		
Mayor of London	Site 40	Welcome the requirement to replace the community use	The Council welcomes this support for re-provision of community facilities	No
HADAS	Site 41	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Middlesex University	Site 41	Assumed that this means that the student room capacity is therefore 48 (16 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Historic England	Site 41	This site is located within an archaeological priority area and adjacent to the medieval church and burial ground. There is substantial archaeological evidence for Roman and medieval activity both within the site and in the surrounding areas.	Requirement added for a desk-based assessment upon application to reflect APA	Yes
Mayor of London	Site 41	Welcome the redevelopment of the car park. Welcome the requirement to replace the community use	The Council welcomes this support for re-provision of community facilities. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 42	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
LB Barnet Estates	Site 42	Existing student halls of residence has an inefficient layout and has potential for optimisation to help meet demand for student bedspaces. In accordance with principles of LONDON PLAN Policy D3 'Optimising site capacity through the design-led approach' and subject discussions with the Council there is scope to redevelop the site to provide up to 567 student bedspaces. We therefore seek amendments to the wording to explicitly state that the student housing capacity of the site could indicatively accommodate up to 567 student rooms.	Number of indicative student units has been clarified.	Yes
Middlesex University	Site 42	Assumed that this means that the student room capacity is therefore 117 (39 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
HADAS	Site 43	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Barnet Society	Site 44	Generally support the building of some housing and upgrading of the public realm but fear that a great opportunity to reconfigure High Barnet as a transport modal interchange is being lost. Highly critical of the overbearing mass of 6-7 blocks proposed an have serious reservations about the loss of so many car parking places. Indicative residential capacity of 292 dwellings is over-optimistic.	Sites near stations are a focus for development at higher densities. This is supported by national and London Plan policy. An opportunity for improving High Barnet interchange. Height parameters have been added to the proposal	Yes
Theresa Villiers	Site 44	Strongly oppose plans to build over station car parks. -	Given the needs to deliver new homes and reduce dependency on the car there are good sustainable reasons to redevelop car parks. Surface level car parking is considered an inefficient use of land when PTAL is high but this has to be counterbalanced with the contribution that provision for car parking can make to town centres. The Council's requirements of proposals that seek the redevelopment of car parks is set out at GSS12. This includes a demonstration that capacity is available.	No
Taylor Wimpey and TfL	Site 44	25% 'non-residential' uses is unlikely to be appropriate in this location and it is unclear how this has been calculated. The site allocation should not refer to a specific target of non-residential uses, but instead state that consideration should be given to providing non-residential uses at ground floor to help activate the scheme. The emerging proposals for High Barnet only include a small proportion of non-residential uses, to protect Chipping Barnet town centre and provide a small amount of complementary uses by the Station. NPPF Paragraph 157 does not state that a prescribed quantum of development or exact mix of uses should be identified in the allocation, as it should promote the flexible use of land. The appropriate quantum and mix of development should be determined by a detailed assessment of the site and its context that would form part of a detailed planning application. The emerging development	Proposal revised. The 25% non-residential largely includes B1 employment uses and the potential for some retained station car parking. The Sites Schedule format has been updated to more appropriately describe the potential mix of uses. Proposed higher figures would need to be justified on design. Barnet's Tall Buildings Study Update provided the basis for identifying strategic locations where tall building proposals may be appropriate. While this site	Yes

		proposals at High Barnet Station is for 294 residential homes, which is broadly aligned with the indicative residential capacity stated in the site allocation. Suggest the indicative capacity is updated to include a more rounded of c. 300. Given the need to optimise accessible brownfield land and site allocations, request that the text explains that the indicative capacities stated are estimates at this stage and the true capacity would be determined through detailed feasibility studies and pre-application dialogue. Text states that the site is not a 'tall building location' and 8 storeys or more would not be appropriate. It should be fully acknowledged by the draft Site Allocation that the High Barnet site has excellent transport accessibility and is one of the most sustainable brownfield sites in the Borough given its location adjacent to an existing transport hub, and therefore that its suitable for an increase in density. The correct height and massing of a development proposal should be informed by a detailed site capacity study that includes examining the local townscape impact. Should be seeking to reduce and remove car parking within the Borough as part of a response to the Climate Emergency and need to create healthy streets. The wording should be amended so that it reflects this objective and positively supports a reduction. An amendment is requested as follows: " <u>the loss of public car parking spaces as part of the redevelopment is supported where the proposal improves sustainable modes of transport and has helped mitigated adverse impacts.</u> " Site plan for the emerging proposal has been amended since the 'Call for Sites' consultation in 2019. TW/TfL request that the draft site allocation boundary is updated accordingly.	has been assessed as suitable for intensification and residential uses, buildings of 8 storeys or more would not be appropriate. The Local Plan supports and encourages sustainable modes of transport while recognising that some car parking may continue to be required. The Council's approach requires reductions in car parking to be justified.	
TfL CD	Site 44	Feasibility work indicates that the suggested residential capacity of 292 should be achievable. To ensure optimised housing delivery, suggest this is raised to 300. 25% of the development as "mixed uses (public car parking and employment)" is unfeasible and would not accord with officers' pre-application advice and Council aspirations. TfL's intention is to provide a mix of uses on the site to deliver housing and commercial and community floorspace that is complimentary to the high street at Chipping Barnet (and also Underhill). 25% car parking and commercial uses would compete with the high street. TfL only intends to provide a relatively small amount of replacement car parking for passengers when it redevelops the site, for the reasons set out above. Therefore, we suggest that the Proposed use types is amended: " <u>residential with limited commercial and community floorspace that would complement the town centre 25% mixed uses (public car parking and employment).</u> " Amend references to car parking: " <u>An assessment must be undertaken of public car parking spaces lost and mitigation provided to encourage the use of public transport and active modes of travel. replacement spaces may be required.</u> " TfL CD considers that all sites close to public transport hubs could be appropriate for tall buildings in order to optimise housing delivery. Request Council to re-consider and assesses whether the High Barnet site could be suitable for a taller building/s given its excellent public transport accessibility, location adjacent to an existing transport hub, local site topography and distance from any other housing.	See response above to Taylor Wimpey.	Yes
HADAS	Site 45	Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Agreed	Yes
CPRE	Site 45	We strongly object to proposals to build a residential development of 149 homes as this site which is a vital area of green space and will be much needed to serve the local population including new residents of major development nearby.	Proposal will ensure retention of the sites best natural features and provide a new community facility. Legal agreement will secure maintenance and management for future generations.	No
Barnet Society	Site 45	Opposed to the building of so many homes on this site and wish to see more imaginative use of the open space for educational, therapeutic and food production purposes.	. See response above to CPRE	No
Elizabeth Silver	Site 45	Agriculture & Community facilities Change to be made: Proposed use: Nature reserve for nature study for local schools (Ashmole, QE Girls, QE Boys) and other Barnet schools. A 10% retention for mixed uses- community uses and local green space, is woefully small. The community uses could mean built-on space. Therefore the remaining green space of 5% or less will be a fragmented space in which there will be very little wildlife. An appreciation of nature is particularly important for the next generations.	See response above to CPRE	No

Gwyneth Cowing Will Trust	Site 45	Support approach of around 149 new homes along with community uses and green space. The site description should include reference to a number of buildings on site, which detract from the character and appearance of the conservation area. Do not consider the site should be named "Whalebones Park". The land in question does not form part of a "Park". Land within the grounds of Whalebones House (which is in separate ownership) may form part of a parkland setting for the House, but that is not part of the proposed allocation. The site should be renamed as <i>Land adjoining The Whalebones</i> .	Proposal revised to reflect existing buildings on and around the site and name of planning application.	Yes
Mayor of London	Site 45	Welcome the provision of a local open space as part of the development. Given the sites agricultural use, allotments could be provided here, if there is local demand	Welcome this support	No
Theresa Villiers	Site 45	Welcome green belt protection in the draft Plan; however, would ask the Council to consider reclassifying Whalebones fields as green belt or local green space. As noted re Whalebones has importance in local community and nature value	This was considered by the Green Belt / MOL Study review which demonstrates no justification for making revisions to existing and MOL boundaries. Proposal will ensure retention of the sites best natural features and provide a new community facility. Legal agreement will secure maintenance and management for future generations.	No
Zizer London	Site 46	In the light of pre-application engagement with council officers and the collaborative approach which has underpinned and shaped the development proposals for the site, which are now subject to the pending planning application, we request that the allocation for Site 46 within the LONDON PLAN is revised to better align with the agreed scope of the pending planning application (ref: 19/6551/FUL) In terms of the proposed use, officers have confirmed that they are supportive of a residential only development. Indeed, given the residential site context of the site, a residential only development was stated as the 'preferred approach' in the pre-application advice response, subject to the necessary contributions towards employment and skills within the Borough The capacity of the site has been a key consideration through the design process and the current application proposes 197 new dwellings, 61 of which will be within the refurbished IBSA House and a further 136 in the new development blocks to the rear of the site. The height and mass of the new blocks have been carefully designed to respect the existing 5-storey element of IBSA House and reduce in height towards the neighbouring residential boundaries to the south and east. As the redevelopment is proposed to be purely residential, and no B1 floorspace is proposed, the site can comfortably accommodate the proposed capacity whilst also delivering ample open space. The development timeframe for the site referred to in the LONDON PLAN is 6 – 10 years. On the basis a full planning application for the redevelopment of the site was validated in Dec2019 and a Spring committee date is being targeted, we would suggest this timeframe is very conservative and a timescale of 3 – 5 years is more appropriate. In summary, based on the above and the work undertaken with Barnet Council in shaping the proposals for the site, we suggest the following changes are made to the draft allocation for Site 46: Proposed use type/s: residential-led with 20% B4 use, Indicative residential capacity: 425 up to 200, Initial planning considerations: Proposals must be of appropriate scale and design that responds to the context. There should be delivery of high quality residential-led mixed-use development comprising a range of housing types and tenures, including family homes. B4 uses should be provided to support economic growth and employment through provision of workspace for small and medium-sized enterprises. Proposals must ensure development does not negatively affect the small area of Green Belt at the north of the site. The policy list within the draft allocation should also be reviewed and we would suggest policy ECY02 'Affordable Workspace' is removed.	Proposal revised and updated to reflect planning consent	Yes
Roger Tichborne	Site 46	Missed opportunity for a more mixed development on a large site, removing employment opportunities. Must have cast iron protections for the Green Belt and not compromise the local wildlife during the development. The timescale seems far fetched, given the vacation date of IBSA.	Proposal revised and updated to reflect planning consent	Yes

Mayor of London	Site 46	The site allocation should be clear how the industrial capacity is to be re-provided	Proposal revised and updated to reflect planning consent Industrial capacity was considered as part of decision on 19/6551/FUL	No
Caroline Thomas and Bob Ganly	Site 46	This proposal is bound to increase traffic in Partingdale Lane, Bittacy Hill, Engel Park and The Ridgeway.	Proposal revised and updated to reflect planning consent.Traffic generation was considered as part of decision on 19/6551/FUL	No
Thames Water	Sites 7, 8, 47 & 50	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	Proposals revised to reflect the potential need for water supply network infrastructure upgrades.	Yes
CPRE	Site 47	A section of Green Belt is included within site. It is vital to protect green space in this area which is subject to extensive redevelopment for about 2500 new homes, in particular because Para 10.5.24 in the Reg 18 document states that the Barnet Green Belt and MOL Study has found that all existing areas of Barnet's Green Belt meets one or more purposes set out in the NPPF.	Any future development proposals that come forward will be assessed in relation the relevant environment policies and where relevant, in accordance with NPPF paras 133 to 147.	No
TfL CD	Site 47	Timeframe should be amended to 5 – 10 years. TfL is unlikely to include car parking provision within a mixed-use scheme (except for people with disabilities) and such references should be deleted from the Proposed use type/s: " residential with 40% mixed uses (retained rail infrastructure, car parking). " References to car parking in the final sentence should be modified: " <i>An assessment of public car parking requirements must be undertaken and mitigation provided to encourage the use of public transport and active modes of travel.</i> provided as required. "	Maintain timescale at 11-15 years unless further evidence of earlier development is available. The percentage for proposed non-residential uses reflects retained transport infrastructure and provides guidance for development. The Council's approach to redevelopment of car parks is set out at GSS12	No
Roger Tichborne	Site 47	Must ensure no limitation on the future provision of a two track layout for the station and an extension to the Saracens/Copthall site. This trackbed must be protected.	Proposal requires retention of tracks. Such an extension has not been highlighted by the London Plan or Barnet's Long Term Transport Strategy.	No
Elizabeth Silver	Site 47	Placing housing on the Mill Hill East Station site (site 47) works against policies TRC01 and TRC02.	Station and transport infrastructure should be enhanced as a consequence of this proposal	No
Caroline Thomas and Bob Ganly	Site 47	Once more, public car parking here very much needs to be extended, rather than reduced, especially with the influx of many more people to the area. The plan mentions "large areas of surface car parking" nearby - but these are used to capacity by those visiting the gym, the GP and the supermarket	Given the needs to deliver new homes and reduce dependency on the car there are good sustainable reasons to redevelop car parks. Surface level car parking is considered an inefficient use of land when PTAL is high. The Council's approach to redevelopment of such car parks is set out at GSS12	No
Elizabeth Silver	Site 47	Change to be made: No residential capacity or community facilities at this site, as the station will need to be expanded. A much greater usage is envisaged due to 4390 new homes in Mill Hill East. With 4390 new homes in Mill Hill East (2245+1400+745 , see GSS07), and an estimate of 2000 extra people using this station every day, it is nonsense to constrict the only underground station within easy reach of the new developments. This proposal goes against TRC01.	The proposal is supported by TRC01.	No
Roger Tichborne	Site 48	Any redevelopment must ensure that there is no loss of provision at any time, given the integral role of the library for young people and elderly residents. The architectural importance of the site should also be recognised.	Re-provision of the library is highlighted as a requirement. Sensitive design including retention of the existing building are listed as important planning considerations for the site.	No

Caroline Thomas and Bob Ganly	Site 48	We fear that this development would kill off the Community Hub, disrupting its functioning for a considerable time at the very least. Its distinctive, listed building might well be swallowed up in the residential buildings.	.See response above to Roger Tichborne	No
Former MHNF	Site 48	We see that once the library is moved to Daws Lane, its current site in Hartley Ave could be redeveloped along with adjacent sites to deliver a new 'fit for purpose' medical centre, together with re-provision of parking and a more substantive number of residential flats/offices leading down to the Broadway. We accept that these properties are in different ownership, but such a development, close to the Broadway's shops and restaurants, and to its good transport links, would be highly sought after. Its design and density could be similar to the existing Titan Court on the opposite side of the road.	See response above to Roger Tichborne	No
Mayor of London	Site 48	Welcome the requirement to replace the community use	The Council welcomes this support for re-provision of community facilities.	No
Mayor of London	Site 49	Development should not extend beyond the exiting footprint of the buildings and should not impact the openness of the Green Belt	Agreed. Proposal reflects this.	No
Geoffrey Silver	Site 49	ECC06, part d, seeks to enhance biodiversity by "ensuring that development makes the fullest contributions to enhancing biodiversity and protects existing site ecology ... through on-site measures". However, the proposal for site 49 would inevitably reverse the aim of this policy by changing the use of landscaped gardens to housing. Currently, many species, including badgers, barn owls and a great variety of birds use this site as a habitat and green corridor.	Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	No
Former MHNF	Site 49	Watch Tower and Kingdom Hall, both parcels of land are of similar area, are in Green Belt and in Mill Hill's Conservation Area. The current total developed footprint is estimated to be around 8%. The permit for JW 'major developed site' on Green Belt does not sanction increasing this footprint. There are no plans to release Green Belt or Metropolitan Open Land (MOL) for residential development (Policy ECC05 and alternative option). Building on 50% of the total area, which could mean 100% of one of the fields, would destroy the Green Belt and harm the green corridor (parallel to the Ridgeway) which is vital for wildlife.	Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan. Any proposal that is not within the footprint of previously developed land must demonstrate very special circumstances.	No
CPRE	Site 49	This site is situated within the Green Belt and so only the current built footprint should be redeveloped. Non-developed Green Belt within this site must remain undeveloped as outlined in both NPPF and the Local Plan review. IMPORTANT NOTE: There is a discrepancy between the Regulation 18 consultation stating an indicative residential capacity of 219 and the Integrated Impact Assessment which states an indicative residential capacity of 493. If the latter number is larger because the proposal is in fact to develop the whole site (not just the existing built footprint) then we object strongly to that.	Any future development proposals that come forward for this site will be considered in accordance with NPPF paragraph 133 to 147. Figure in IIA for site 49 has been revised as has GSS07	Yes
Roger Tichborne	Site 49	A missed opportunity for a more mixed development on a large site, removing employment opportunities. Cast iron protections for the Green Belt. Timescale unrealistic Local wildlife must be protected both from development and disturbance during development.	Proposal acknowledges that this is a sensitive site. It outlines need for retention of community uses, and clearly sets out the Green Belt and Conservation Area status as well as the need to respond to nature conservation value including TPOs. Any proposal that is not within the footprint of previously developed land must demonstrate very special circumstances.	Yes
Manni Sadaghiani	Site 49	Object to development of the JW site. My home directly faces this land and any kind of development on this site will have a direct and profound impact on the quality of my life. The land in question is located among a neighbourhood, living a life in a semi-rural environment, entirely comprised of semi detached 1930s built 2 story houses. Any new development, matching those already filling the old Army Barracks and the Medical research site nearby, will totally destroy its current character. I was also made to believe the site is on Green Belt, which must remain open for all to enjoy.	See response above to Roger Tichborne. Support for increasing access to Green Belt is welcome.	Yes
Steve Jacobs	Site 49	The new proposed plan backs directly onto garden and will impose on premises. Opposed to the development and will take further action if necessary. Area has been overrun by new developments and	See response above to Roger Tichborne	Yes .

		no additional infrastructure has been built. The Site is a habitat for wildlife & protected species. There are a number of large mature trees which are protected by TPO's. Part of a green corridor going all along the Ridgeway, including Driver's Hill to the Mill Fields which will be fragmented.		
Chris Carabine	Site 49	<p>Site is in the Mill Hill Conservation area and the Green Belt and, as a semi-rural area, it would be entirely inappropriate to develop the Watchtower site as proposed. Increasing the built footprint to 50% would destroy the semi-rural character of the two sites and breach the Green belt requirement to remain open and permanent. Construction of a new building on Green Belt is inappropriate unless it is in the same use and not materially larger than the one it replaces. Buildings must not have a greater impact on the openness of the Green Belt than the existing development. The proposal at Watchtower would exceed the current level of development. The policy wording states "any development must consider the Mill Hill Conservation Area and Green belt designations" – surely this must include not increasing the development footprint at Watchtower House and Kingdom Hall beyond the existing. Obviously this footprint must not include the "car park" at Watchtower as it is in illegal use having exceeded its temporary use allowance granted when permission was originally granted as tennis courts. I believe the current development levels in Mill Hill East and the above-mentioned designations would not meet the tests set out in NPPF (para 137) necessary in order to demonstrate exceptional circumstances sufficient to justify Green Belt release. There are currently 85 accommodation units on a small footprint and three stories at Watchtower House but these are akin to student hall accommodation rather than flats. It would be disingenuous to refer to them as residential units in the normal sense. The Draft development plan for site 49 gives 219 flats ie substantially larger units on more storeys, or development on a much larger footprint in breach of Green belt expectations. Hard to see how this residential growth on this site can comply with "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt." Habitat for wildlife & protected species The Watchtower House and Kingdom Hall sites provide a vital green corridor between the gardens of Bittacy Park Avenue, running parallel to the Ridgeway, including Drivers Hill (a Site of Borough Importance for Nature Conservation) all the way to the Mill Field and Lawrence Street and the green areas at the rear of the Mount School. I am a birdwatcher and naturalist and have regularly witnessed over 20 species of birds in Bittacy Park Avenue and Watchtower House gardens including 2 species of woodpecker, nuthatch, goldfinch, greenfinch, jay, jackdaw, 4 species of tit, tawny owl, song thrush and migratory and passing birds such as blackcaps, redwings, buzzard, and kestrel. There are also regular mammals including badger, muntjac deer hedgehogs and squirrels. Any roads built through the greenbelt area inevitably to service the new dwellings will create a barrier to wildlife migration and isolate wildlife and habitat. Building on a larger footprint than at present will fragment the green corridor which surely must be retained for this land-based wildlife. I believe residents would lose the amenity of seeing this diversity of wildlife and well as the obvious impact on the ecology of the area. The mature and diverse trees in the areas concerned, particularly at the rear of Bittacy Park Avenue gardens, must be protected for their visual amenity, enhancement of privacy and most importantly for the wildlife which depends on them for feeding and nesting. I cannot conceive that any developer would honour the existing TPO's with such gains to be made on development and such derisory sanctions attached to TPO breaches. From NPPF para 174. "To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks.....; wildlife corridors and stepping stones that connect them; ... and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. " Have these plans been drawn up? Surely any development proposals must be contingent on such plans having been drawn up and the safeguarding and conservation issues identified. I would like to hear who will undertake this work and for residents including myself to be consulted at all stages. Amenity. Even if</p>	See response above to Roger Tichborne	Yes

		the trees survive, any vertical development to the rear of Bittacy Park Avenue will lead to significant loss of visual and audible amenity compared to current amenity and there will be inevitable loss of privacy given that we are not currently overlooked at all.		
Gwenda Levy	Site 49	I would like to object most strongly. The proposed development and density would have a huge impact on this Green Belt Conservation Area. With only: One Tube Station - a VERY limited branch line too Two bus routes, One small doctor surgery, One supermarket, One park for children to play in. One local primary school in the immediate vicinity - St Vincent's. This proposed development is putting more strain on the already over-extended amenities and limited infrastructure we currently have. To add to this point, the amount of HGV's that will be pouring into our area will further damage the already broken roads. The hole at the end of Bittacy Park Avenue, next to the bus stop on Engel Park, is now so vast that all vehicles have to go round it by veering on to the opposite side of the road. This is not something that can take any further strain. The destruction of the already depleted wildlife and biodiversity should be taken into consideration. We live in a beautiful area full of remarkable species that must not be ignored or disregarded. Also carparks and tennis courts should not be considered as footprint and development allowed. The existing footprint for both sites is 6% and the London Plan states: <i>Buildings must not have a greater impact on the openness of the Green Belt than the existing development</i> (London Plan 2019 & NPPF paras 133, 145.)	See response above to Roger Tichborne. Any future development proposals that come forward for this site will be considered in accordance with NPPF paragraph 133 to 147	Yes
Nathan Aziz Levi	Site 49	I would like to strongly object to the proposed development of the Kingdom Hall Jehovah's Witness site. The plans go over the footprint of the existing site by a huge amount, going against everything you claim to stand for. Tennis courts and car parks are not to be considered as part of the footprint and development allowed. The environmental impact on our area will be immense. Roads will be more blocked and heavily used than they already are. We have potholes the size of craters in our roads as it is causing disruption and damage to our vehicles. The HGV'S that the builders will be using on an hourly basis will only further impact this as the years go on. There are no school places as it is. There is only 1 branch line tube station. 2 bus routes that are already under immense strain. 1 doctor surgery and 1 supermarket. Where do you propose these new residents and their offspring go? Consideration must also be given to the impact this project will have on the local air quality, both in terms of pre-, during and post-development. The increased influx of cars and vehicles will most certainly have an impact on our wildlife, our children and their ability to breathe clean air	See response above to Roger Tichborne The Infrastructure Delivery Plan (IDP) provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure. This is a live document that will be continuously updated. Planning Obligations in the form of CIL and S106 will be used to help deliver new social infrastructure in the Borough, including health facilities.	Yes
Elaine Ryder	Site 49	Site is in the Mill Hill Conservation area and the Green Belt and, as a semi-rural area, it would be entirely inappropriate to develop the Watchtower site as proposed. Increasing the built footprint to 50% would destroy the semi-rural character of the two sites and breach the Green belt requirement to remain open and permanent. Construction of a new building on Green Belt is inappropriate unless it is in the same use and not materially larger than the one it replaces. Buildings must not have a greater impact on the openness of the Green Belt than the existing development. The proposal at Watchtower would exceed the current level of development. The policy wording states "any development must consider the Mill Hill Conservation Area and Green belt designations" –this must only include the development footprint of the current Watchtower House and Kingdom Hall . This footprint must not include the "car park" at Watchtower as it is in illegal use having exceeded its temporary use allowance granted when permission was originally granted as tennis courts. It would appear that the current development levels in Mill Hill East and the above-mentioned designations would not meet the tests set out in NPPF (para 137) necessary in order to demonstrate exceptional circumstances sufficient to justify Green Belt release. There are currently 85 accommodation units on a small footprint and three stories at Watchtower House This accommodation is similar to student hall accommodation rather than flats. It would be disingenuous to refer to them as residential units in the normal sense. The Draft development plan for site 49 gives 219 flats these we assume will be substantially larger units and will require more storeys, or development on a much larger footprint in breach of Green belt expectations. It is therefore	See responses above to Roger Tichborne and Nathan Aziz Levi.	Yes

		<p>difficult to see how this residential growth on this site can comply with “ <i>A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.</i>” The Watchtower House and Kingdom Hall sites provide a vital green corridor between the gardens of Bittacy Park Avenue, running parallel to the Ridgeway, including Drivers Hill (a Site of Borough Importance for Nature Conservation) all the way to the Mill Field and Lawrence Street and the green areas at the rear of the Mount School. The wide range of species of birds observed in Bittacy Park Avenue and Watchtower House gardens is exciting. including 2 species of woodpecker, nuthatch, goldfinch, greenfinch, jay, jackdaw, 4 species of tit, tawny owl, song thrush and migratory and passing birds such as blackcaps, redwings, buzzard, and kestrel. There are also regular mammals including badger, muntjac deer hedgehogs and squirrels. (photographic evidence of these can be supplied). Any roads built through the greenbelt area inevitably to service the new dwellings will create a barrier to wildlife migration and isolate wildlife and habitat. Building on a larger footprint than at present will fragment the green corridor which surely must be retained for this land-based wildlife. The mature and diverse trees in the areas concerned, particularly at the rear of Bittacy Park Avenue gardens, must be protected for their visual amenity, enhancement of privacy and most importantly for the wildlife which depends on them for feeding and nesting. I cannot conceive that any developer would honour the existing TPO's with such gains to be made on development and such derisory sanctions attached to TPO breaches. From NPPF para 174. “To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks.....; wildlife corridors and stepping stones that connect them; ... and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. “ Have these plans been drawn up? Surely any development proposals must be contingent on such plans having been drawn up and the safeguarding and conservation issues identified. I would like to hear who will undertake this work and for residents consulted at all stages</p> <p>Community Infrastructure There has already been very substantial residential development and population increase in Mill Hill ward and the infrastructure is not keeping up. There are no new supermarkets hence the existing one struggles to maintain stock , there are no new GP surgeries as developers failed to deliver a new surgery on Millbrook Park and roads are over-used and becoming very dilapidated and unsafe. Passengers at Mill Hill East TFL station are already experiencing difficulties boarding trains in rush hour periods and there will be many more residents to service on completion of Ridgeway views on the site of the former Medical research centre and the Millbrook Park etc developments at the Council Depot and Barracks sites Amenity - Even if the trees survive, any vertical development to the rear of Bittacy Park Avenue will lead to significant loss of visual and audible amenity compared to current amenity and there will be inevitable loss of privacy given that we are not currently overlooked.</p>		
Cesira de Chiara	Site 49	<p>Specific requested CHANGE: Permissible built footprint to be no more than the current one which is 10% on the Watchtower site and 2% on the Kingdom Hall site. Height of buildings to be no more than 3 stories as at present. The following REASONS should be taken into account: The site is in the Mill Hill Conservation area and has a semi-rural character Increasing the built footprint to 50% would destroy the semi-rural character of the two fields. The site is on Green Belt, which must remain open and permanent. Construction of a new building on Green Belt is inappropriate unless it is in the same use and not materially larger than the one it replaces. Buildings must not have a greater impact on the openness of the Green Belt than the existing development (from London Plan- 2019, and NPPF paras 133, 145).The current built-on footprint is 6% for the two sites. The car parks do not have planning permission-they were applied for as tennis court. The JW development had been classified at some point as a “major development on Green Belt” because there are more than 10 dwellings / more than</p>	See response above to Roger Tichborne	Yes

		1000 m2 of non-residential space but this does not sanction an increase in built height, on a footprint of 50% (of the 73,000 m2). The site is a habitat for wildlife & protected species such as badgers an barn owls. There are also a significant number of la4e mature trees which are protected by TPOs. It is part of a green corridor going all along the Ridgeway, including Driver's Hill to the Mill Fields, which will be fragmented if the proposed development goes ahead The proposed building density would mean a loss of amenity and privacy for the adjacent gardens		
Elizabeth Silver	Site 49	<p>The site is on Green Belt and in the Mill Hill Conservation area. Change to be made: Permissible built footprint to be no more than the current one which is 10% on the Watchtower site and 2% on the Kingdom Hall site. Height of buildings to be no more than 3 stories as at present. Green Belt to be retained in the same proportion as at present. Car parks to be converted to tennis courts or green space. The site is a habitat for wildlife and is part of a green corridor. The proposed development of building on 50% of the area with 219 housing units is not permissible by: 1. The criteria in NPPF paras 133,145, 174 2. The London Plan para 8.2.2, Policy G2, 3. Barnet's Policy ECC05 4. Barnet Draft Plan 10.5.1, 10.5.2, 10.5.19. 5. Barnet Policy HOU01 says that GB/MOL land should not be released for housing. Policy ECC05 in Barnet Draft Plan: "<i>i. Any proposals for development in Green Belt will be considered in accordance with NPPF paras 133 to 147. ii. Development adjacent to Green Belt should not have a significant detrimental effect on the openness of the Green Belt and respect the character of its surroundings.</i>"</p> <p>The proposed building density would mean a loss of amenity and privacy for the adjacent gardens <i>Barnet Draft Plan 6.8.1</i>. The local health facilities, near Waitrose, are overwhelmed even before the Mill Hill East estate is fully occupied. The chance to have a separate GP surgery on the Millbrook estate was by-passed. The current residential capacity is 85, on three stories, with a total built footprint of 6% on both sites. The Draft Plan mentions a residential capacity of 219 and the Impact Assessment even suggests 493 units with no Green Belt retained. The higher figure is apparently a mistake. However, even 219 would destroy the Green Belt and semi-rural character on that site. Exceptional circumstances cannot be claimed (Policy ECC05) to justify increasing the footprint to 50% or more and tripling the number of housing units from 85 to 219.</p> <p>The Jehovah's Witnesses development had been permitted because it was for a charity/ educational institution and had a relatively small footprint of 6%.. It was classified as a "major development" because there are more than 10 dwellings / more than 1000m2 of non-residential space / site is more than 1 hectare (NPPF definition p 68). The rest of the site, that is more than 90%, consists of gardens.</p> <p>Footprint: The Watch Tower site (east field) has a built footprint 10%. This was woodland prior to the 1960s when the Jehovah's Witnesses moved in. The IBSA website gives the built foot print of the Watchtower House site as 4571/ 32629 = 14% so this must include the car parks. The on-site car parks were built without planning permission. They were applied for as tennis courts (Ref: W03005AJ) in 1997 with 'temporary' use for car parking while building works were going on (correspondence available) but have been in continuous use since then as car parks. These areas must therefore be returned to green belt. Kingdom Hall site (west field) - built footprint 2%. It was previously a farm, and sheep were kept there. These footprints have been carefully measured from the map. Both sites have a similar area of 8 acres (32,000m2) so the percentage for the combined site is 6%. The site is a habitat for wildlife which must be respected. <i>Barnet Draft Plan 10.5.1, 10.5.2, 10.5.19</i>. It provides a green corridor, which reaches from the gardens of Bittacy Park Avenue, parallel to the Ridgeway, including Drivers Hill (a Site of Borough Importance for Nature Conservation) all the way to the Mill Field and Lawrence Street. Building on a larger footprint than at present will fragment the green corridor which must be retained for land-based wildlife. There are Barn Owls and Badgers on the site, both protected species. It should be noted that community use would mean a less protected habitat for wildlife. There are also a number of large mature trees which are subject to Tree Preservation Orders e.g. TRE/HE/6</p>	<p>See response above to Roger Tichborne</p> <p>The Watchtower House site was previously identified as a Major Development site within the Green Belt in the 2006 Unitary Development Plan (UDP) due to its existing uses and were considered suitable for redevelopment and/ or infilling.</p> <p>Any future development proposals that come forward for this site will be considered in accordance with NPPF paras 133 to 147</p>	Yes

		dating from 1953. <i>“The Mayor wants to increase tree canopy cover in London by 10 per cent by 2050.”</i> London Plan para 8.7.2		
Geoffrey Silver	Site 49	Watch Tower House has 85 residential units and three floors. Careful mapping shows that it occupies 10% of the eastern half of site 49, which is landscaped gardens with protected mature trees. This 10% figure excludes the so-called “tennis courts” used permanently as car parks without planning permission. Kingdom Hall occupies 2% of the western half which is a grassy field. Together, the two buildings have a combined footprint of 6% of the whole of site 49. The proposal is for 219 homes (hopefully not 493 as in the Impact Assessment) in 40% of the whole site, community use 10%, and undeveloped Green Belt 50%. Presumably the western half would remain virtually undeveloped, and the eastern half would be filled with housing and community use. This would be a huge further intrusion of building in the eastern half, when the whole site is a conservation area in the Green Belt. The new London Plan states that: □ “Development proposals that would harm the Green Belt should be refused”, and “Green Belt de-designation will not be supported” (policy G2) □ “Openness [i.e. lack of buildings] and permanence are essential characteristics of the Green Belt” (section 8.2.2) □ “Boroughs should support the protection and conservation of priority species and habitats ... and promote opportunities for enhancing them using Biodiversity Action Plans” (policy G6, part B3). Site 49 is enjoyed as a Green Belt habitat and green corridor by many species, including badgers, barn owls and many other birds. This proposal would also very seriously damage the amenity of neighbours with gardens backing on to the Watch Tower House site’s eastern half. The huge leap in development would destroy its Green Belt openness and permanence, and thus render its designation as Green Belt meaningless. Is the Indicative residential capacity 219 or 493? The Barnet Draft Local Plan (Reg 18) states <i>“Indicative residential capacity: 219”</i> where as its ‘Part 2 – Integrated Impact Assessment with Appendices’ states <i>“Indicative residential capacity: 493”</i> .	See response above to Roger Tichborne Figure in IIA for site 49 has been revised as has GSS07	Yes
Marsfield (Avison Young)	Site 49	We strongly support inclusion of Watchtower House; however, we would request that the ‘proposed use type/s’ is extended to include reference to the suitability of SOPH on this site (as well as general housing). Suitability - Policy H13 (Specialist Older Person Housing) of LONDON PLAN requires Boroughs, when identifying sites suitable for SOPH, to consider local housing need and how well-connected the site is; in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure, health care, and being well served by public transport. Watchtower House site is able to demonstrate both of these points: As discussed above there is a clear need for SOPH; site will contribute to an inclusive neighbourhood, by forming a key connection between traditional residential developments at Millbrook Park and NIMR, within the Mill Hill East Growth Area, whilst introducing SOPH to create a more mixed and balanced community; The site is well located to have access to the services within the Mill Hill local centre, to the south of the site; The site is well served by Public Transport: Mill Hill East Tube Station (Northern Line) is 900m to the south of the site, along The Ridgeway, and provides direct links into Central London; The 240 Bus Route stops outside of the site, along The Ridgeway, and runs between Golders Green and Edgware Stations; and 221 Bus Route stops 150m to the south of the site, along Engel Park, and runs between Edgware Bus Station and Turnpike Lane Station. In addition to the above, we would like to reiterate that the site continues to be both available and achievable: Availability - Site is privately owned, within single ownership and there are no Agricultural Tenancies. Existing tenants (IBSA) are in process of being relocated to a new facility in Essex, which is expected to be completed by the end of 2020, allowing the site to become available for redevelopment. The landowner is actively seeking to redevelop the site. Achievability - PPG (Para 020) advises that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. Marsfields have confirmed their intentions to redevelop the site for SOPH. In their view the site presents a realistic and viable opportunity for development which would be attractive to future residents.	See response above to Roger Tichborne Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	Yes

		Marsfields sought pre-application advice from LB Barnet and three meetings were held between Oct and Nov 2019. A pre-application response was received from LB Barnet on 12th Feb 2020, which noted that officers were encouraged by the design progress made and stand ready to support the applicant in developing the scheme further.		
Lucia Carabine	Site 49	<p>The site is in the Mill Hill Conservation area and the Green Belt and, as a semi-rural area, it would be entirely inappropriate to develop the Watchtower site as proposed. Increasing the built footprint to 50% would destroy the semi-rural character of the two sites and breach the Green belt requirement to remain open and permanent. Construction of a new building on Green Belt is inappropriate unless it is in the same use and not materially larger than the one it replaces. Buildings must not have a greater impact on the openness of the Green Belt than the existing development. The proposal at Watchtower would exceed the current level of development. The policy wording states "any development must consider the Mill Hill Conservation Area and Green belt designations" – surely this must include not increasing the development footprint at Watchtower House and Kingdom Hall beyond the existing. Obviously this footprint must not include the "car park" at Watchtower as it is in . We have seen bats over the years and are worried about disturbing their habitat. Mill Hill East and the above-mentioned designations would not meet the tests set out in NPPF (para 137) necessary in order to demonstrate exceptional circumstances sufficient to justify Green Belt release. There are currently 85 accommodation units on a small footprint and three stories at Watchtower House but these are akin to student hall accommodation rather than flats. It would be disingenuous to refer to them as residential units in the normal sense. The Draft development plan for site 49 gives 219 flats ie substantially larger units on more storeys, or development on a much larger footprint in breach of Green belt expectations. Hard to see how this residential growth on this site can comply with "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt." Habitat for wildlife & protected species The Watchtower House and Kingdom Hall sites provide a vital green corridor between the gardens of Bittacy Park Avenue, running parallel to the Ridgeway, including Drivers Hill (a Site of Borough Importance for Nature Conservation) all the way to the Mill Field and Lawrence Street and the green areas at the rear of the Mount School. [There is a wide range of species present on site]. Any roads built through the greenbelt area inevitably to service the new dwellings will create a barrier to wildlife migration and isolate wildlife and habitat. Building on a larger footprint than at present will fragment the green corridor which surely must be retained for this land-based wildlife. I believe residents would lose the amenity of seeing this diversity of wildlife and well as the obvious impact on the ecology of the area. The mature and diverse trees in the areas concerned, particularly at the rear of Bittacy Park Avenue gardens, must be protected for their visual amenity, enhancement of privacy and most importantly for the wildlife which depends on them for feeding and nesting. I cannot conceive that any developer would honour the existing TPO's with such gains to be made on development and such derisory sanctions attached to TPO breaches. From NPPF para 174. "To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks.....; wildlife corridors and stepping stones that connect them; ... and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. " Have these plans been drawn up? Surely any development proposals must be contingent on such plans having been drawn up and the safeguarding and conservation issues identified. I would like to hear who will undertake this work and for residents including myself to be consulted at all stages Community Infrastructure- There has already been very substantial residential development and population increase in Mill Hill ward and the infrastructure is not keeping up. There are no new supermarkets hence the existing one struggles to maintain stock, no new secondary schools, and roads are over-used and becoming very dilapidated and unsafe.</p>	<p>See responses above to Roger Tichborne. and Nathan Aziz Levi.</p> <p>Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.</p>	Yes

		Passengers at Mill Hill East TFL station are already experiencing difficulties boarding trains in rush hour periods and there will be many more residents to service on completion of the Millbrook Park etc developments at the Council Depot and Barracks sites. Even if the trees survive, any vertical development to the rear of Bittacy Park Avenue will lead to significant loss of visual and audible amenity compared to current amenity and there will be inevitable loss of privacy given that we are not currently overlooked at all.		
Hilary Yarde Martin	Site 49	I object to the significant change in the built footprint. Currently the built areas of the combined sites are only about 6% of the total. I would like the built footprint to remain at this level and for the proposals to be left at a maximum of 3 storeys. This site, which adjoins our garden, is in the Mill Hill Conservation Area. The semi-rural nature of this site would be destroyed. This site is on the Green Belt and as such the construction of new buildings is inappropriate." 2.0.2 London's green and open spaces are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners. London's Green Belt and Metropolitan Open Land designations serve to protect these strategically-important open spaces, prevent urban sprawl and focus investment and development on previously developed land." Draft London Plan – consolidated changes version – July 2019. Current owners of Watchtower House applied for construction of tennis courts several years ago as part of the garden area. These "tennis courts" have been used as "overflow" car-parks on a daily basis ever since. They should not be considered as part of the built up area and thus to be converted to housing. The site is a wonderful habitat for all kinds of wildlife, including a pair of nesting barn owls, badgers and foxes. The open field provides hunting ground for buzzards and more recently red kite. Wooded area provides cover for firecrests, woodpeckers, nuthatches, treecreepers amongst other more common birds, and the holly berries provide food for the annual visit of fieldfares and redwings. Some of these are protected species. Deliberate removal of their habitat will result in decrease in their numbers. There are a large number of mature trees which are protected by Tree Preservation Orders. This is part of a green corridor which runs right along the Ridgeway. The fragmentation of this corridor will cause further decline for species like hedgehog. The proposed building density would result in a loss of precious amenity and also loss of privacy for the adjacent gardens.	Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	Yes
Amber Infrastructure Ltd (Lichfields)	Site 49	Support aims and objectives of the site allocation and agree with the range of uses envisaged for the wider site: residential and community uses, with an element of the site kept as open land. However, we consider changes are required to the wording so the policy is sound in line with the requirements set out in the NPPF (para. 35), and provision made for educational needs also. As currently drafted, the policy wording for Site No. 49 is unclear and may be interpreted that the 50% to be maintained as open land should be the area of the site directly to the south of the Kingdom Hall. To ensure soundness, Local Plans must ensure its policies are sufficiently flexible so they are effective and can be implemented (a further key test of soundness as set out in the NPPF, para. 35). There are various options for the delivery of development on the site and we therefore suggest the following: Proposed use type/s: residential (which can include specialist housing/assisted living units), community and education with around 50% retained as of the site undeveloped Green Belt. The insertion of "around" provides sufficient flexibility to enable the site allocation to be delivered, to reflect market conditions and the site constraints. This is important to ensure the delivery of sites in Local Plans over the Plan period. These changes are consistent with the aims of the allocation but would allow more than one redevelopment option to come forward, for instance development on the northern part of both parcels with the land to the rear left open. We have also made reference to the inclusion of educational uses within the acceptable uses for the site. As set out in the pre-application submission to LB Barnet for this site, there is a need for a Special Educational Needs school, and this site has been identified as suitable for this provision. The service to be provided at this school is currently not offered at any other school within the	Proposal acknowledges that this is a sensitive site. It outlines need for retention of community uses, and clearly sets out the Green Belt and Conservation Area status as well as the need to respond to nature conservation value including TPOs. Any proposal that is not within the footprint of previously developed land must demonstrate very special circumstances. Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	Yes

		borough and there is a pressing need for this type of facility in this location. From our client's perspective, we also consider development on the western part of the site could be delivered within the short/medium term, rather than 11-15 as stated.		
Des Yarde Martin	Site 49	I object to the significant increase in the built footprint of the site. Currently the built footprint makes up 6% of the total area; to increase this to 40% plus 10% community use, would have a significant negative impact on wildlife and on house owners, of whom I am one, whose properties border the site. This increase would destroy the semi-rural nature of the Mill Hill Conservation area as well as diminishing the rural aspect of the Ridgeway. The rural aspect of Mill Hill East has already been diminished by significant developments on the Millbrook Park Estate and the site of the erstwhile National Institute for Chemical Research. The site provides habitats for a great variety of animals: a pair of nesting barn owls, treecreepers, nuthatches, firecrests and woodpeckers plus summer visitors such as redwings and fieldfares. There are also many other more common birds that brighten gardens, trees and sky. At ground level, badgers and foxes have room to live. All of this will be jeopardised if this development goes ahead as proposed.	See response above to Roger Tichborne Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	Yes
Amber Infrastructure Ltd (Lichfields)	Site 49	Support inclusion within Local Plan. Whilst delivery of site is likely be split, between eastern and western parcels, we confirm our client is looking to redevelop the western parcel and therefore the allocation is deliverable; a key test of soundness of set out in NPPF (para. 35).	Support welcomed.	No
Victor Montefiore	Site 49	<u>Arbitrary land grab of undeveloped Green Belt for residential development</u> <i>Proposed use type/s: residential with 50% retained as undeveloped Green Belt and 10% community uses</i> -This implies that at least 40% of the land will be for residential development. The Council's response to this question, per Hendon Residents Forum (Wednesday 4 March 2020) was " <i>The Watchtower House site has been previously classified as a Major Development Site within the Green Belt due to the existing uses. As such, part of the site has been judged as suitable for potential redevelopment, including for residential and community uses</i> " (see reference 4). It is potentially appalling governance as there is no record of any committee and or councillors approving this 'judgement'. Further the implication that the " <i>site has been previously classified as a Major Development Site within the Green Belt due to the existing uses</i> " does not mean that it can be judged to be ripe for further extensive development. This is because the classification simply derives from the current usage per the Glossary definition (see reference 5) " <i>Major Developments: 10 or more residential units (or if a number is not given, where the area is more than 0.5 hectares), or 1,000 m2 (or more) gross commercial floorspace.</i> " <u>Problem 2 – No 'exceptional circumstances' have been demonstrated</u> The 'Alternative Options' to both BSS01 Spatial Strategy for Barnet' and 'GSS01 Delivering Sustainable Growth' set the principle that Green Belt sites should not be selected. This is wise and in accordance with NPPF para137 and also in accordance with New London Plan (Consultation Draft) Policy G2 London's Green Belt. The 'Barnet Draft Local Plan (Reg 18) Site Selection Background Report', 'Appendix 3 - List of Sites considered to be not developable' contains a list of seventeen other sites that have <u>all</u> been rejected on with the reason that they are Green Belt. And 'Section 3.1 National and London Plan Policy Context' acknowledges the importance of the NPPF " <i>Specific National and London Plan Policies to be taken into account: NPPF Section 13 Protecting Green Belt Land specifically para 134</i> " <u>Only 7% or 8% of the site is presently developed</u> . How therefore was it 'judged' that a land grab of 32% or 33% of an undeveloped Green Belt site (i.e. 2.38 hectares on which there are no buildings) is reusable for residential development? <u>Problem 4 – There is a wide ranging Tree Preservation Order on the Watchtower House Site.</u> However the 'judgement' of 40% of the site for residential development does not take into account how extensive the Tree Preservation Order TRE/HE/6 actually is. <u>Problem 5 – There are protected species – badgers and barn owls on the site</u> - However the 'judgement' of 40% of the site for residential development does not take into account the fact that protected species are on the site – protected by the Wildlife & Countryside Act 1981 and the Protection of Badgers Act 1992. <u>The Green Belt classification of the site is to protect Mill Hill</u>	The Watchtower House site was previously identified as a Major Development site within the Green Belt in the Unitary Development Plan (UDP), the statutory development plan for the Borough which was formally adopted by the Council, following extensive public consultation and examination by a Government Planning Inspector, in May 2006.. Proposal acknowledges that this is a sensitive site. It outlines need for retention of community uses, and clearly sets out the Green Belt and Conservation Area status as well as the need to respond to nature conservation value including TPOs. Any proposal that is not within the footprint of previously developed land must demonstrate very special circumstances. Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	Yes

		<u>Conservation Area</u> - 'NPPF para 134' (outlines main purpose of the green belt. To that end, the purpose of the Green Belt designation of the site within Mill Hill Conservation Area is in part to: - " <i>check the unrestricted sprawl of large built-up areas</i> " i.e. check the unrestricted sprawl of Mill Hill East and - " <i>to prevent neighbouring towns merging into one another</i> " i.e. to prevent Mill Hill East and Mill Hill Village merging with each other. Again it is simply not good enough to tack on to the end of GSS07 "Any development proposal must consider the Mill Hill Conservation Area and Green Belt designations." – because Mill Hill East is a large built up urban area and Mill Hill Conservation Area is not - as the boundary diagram below very clearly illustrates (see reference 3).		
Caroline Thomas and Bob Ganly	Site 49.	Only 50 % of the undeveloped Green Belt land here would be retained under this proposed plan. This would deprive people on the adjacent estate of a great source of pleasure. We ourselves often use the footpath beside the site when walking to the Ridgeway. The proposed development would also create much extra traffic on The Ridgeway, which has been busy with construction vehicles for many months.	See response above to Roger Tichborne	yes
Thames Water	Site 5, 6, 9 to 14, 27, and 28	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	Proposals updated to reflect the need to consider the wastewater network.	yes
HADAS	Site 5	Add: CDH08 Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
NHS Property Services	Site 5	Potential development of this site for residential-led development does not mean that it will require current occupiers to leave the site or will force any diminution of services. We assume that the reference to " <i>25% hospital continuing in use</i> " should refer to the site area rather than hospital floorspace. Site 5 describes that Colindale station is within approximately ½ km of the site. This should be amended to refer to Burnt Oak station. Whilst it is noted that the site has an indicative residential capacity of 800 dwellings, it is important that flexibility is retained in this figure until further feasibility work is undertaken in relation to viability. NHS Property Services is currently undertaking this work and will share it with the Council at the earliest opportunity.	Proposal revised. The number of units stated is indicative only – proposals must demonstrate a suitable quantum of development that meet design and housing requirements.	Yes
Elizabeth Silver	Site 5	Change to be made: Proposed use: Retain spare site area for future expansion of hospital in view of increase in population in Barnet. No residential capacity. Barnet's growth will represent unsustainable development unless plans are in place for spare capacity for healthcare and hospital facilities.	The borough has a statutory duty to plan for minimum housing targets set out in the London Plan	No
Mayor of London	Site 5	Welcome optimising development on this site and the development of the car park	The Council welcomes this support. Our approach to redevelopment of car parking is set out and justified through GSS12	No
Environment Agency	Site 5	Site description needs to include that the majority of the site is in Flood Zone 2, in addition to the third of site being within Flood Zone 3a. There is also Flood Zone 3b on site, constrained to the river corridor of Silk Stream main river. If the site passes the Sequential Test for the Local Plan, a Level 2 SFRA needs to inform the planning considerations for this site, specifically flood risk mitigation measures required. The sequential approach should be applied on site to ensure the more vulnerable uses are located in areas of lowest flood risk within the site. Should mention the opportunity to remove obsolete weirs at the confluence of the Silk Stream and Deans Brook in northern part of site. The site requirements should stipulate any tall building should be located away from Silk Stream main river.	Proposal revised.	Yes
Former MHNF	Site 50	Site 50 is a new to us, and we have not had time to evaluate its potential. We understand it is owned currently by TFL and is part of the old disused exit off the M1 where extensive fly-tipping recently	Opportunity to comment on the soundness of this proposal at Reg 19	No

		occurred. We would resist any development on this land locked site that would reduce the opportunity to improve the transport infrastructure between Mill Hill East and Mill Hill Broadway as part of this site included the old LNER railway line, and further developments over this old line, and notably under the spare arch of Bunns Bridge over the A1, are to be strongly discouraged.		
CPRE	Site 50	Site suffers from poor air quality and is already densely developed. Any development must not negatively affect current residents. There must be good open space provision within any redevelopment	Site is vacant. Policy ECC02 addresses air quality issues, including requirement for Air Quality Assessments and appropriate mitigation.	No
TfL CD	Site 50	Requirement to preserve mature trees might inhibit optimising housing delivery and text should be reworded: " <i>Preservation of any high quality mature trees or mitigation for removal is required.</i> " This site is likely to be marketed through the GLA's small sites programme in 2020 - the Development timeframe should therefore be corrected from 11 – 15 years to within five years.	Proposal revised	Yes
Leathersellers (DP9)	Site 51	Site 51 is within the ownership of the Leathersellers Company. The principles of a residential-led mixed use redevelopment are strongly supported. The local heritage assets are noted along with the Site of Borough Importance for Nature Conservation. The timescales for redevelopment are likely to be close to those in the draft document. One important point to note is that the small area to the south east made up of a terrace of lock-up style single storey garages with some open land behind which have been omitted from the allocations. We would request that this area is added in for completeness.	We welcome this support. Boundaries cannot be revised at this stage. However this does not preclude this small site coming forward as part of a future planning proposal.	Yes
Barnet Society	Site 52	Object to the quantity of units proposed on the grounds of overdevelopment and its damaging impact on both New Barnet's civic realm and the residential Lyonsdown Road.	Shaping the future development of Kingmaker House through the Local Plan is the most appropriate way to get positive outcomes for New Barnet Town Centre	No
HADAS	Site 53	Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Agreed	Yes
Susan Solomon	Site 53	I live in the Northway House development in Whetstone. In fact I have lived in Whetstone for 57 years, as well as my parents and grandparents. We have seen many good changes over the years. I am saddened to hear that you plan to utilise the green space for this development. Please don't cut the trees down to make way for this huge building project. Of course, you can't stop Michael Gerson and A1 storage selling their land to developers, but you have it in your power to permit planning only to their land, and thus save the green space ie. forest area. You already gave permission a few years ago for a large development to be built in St. Margaret's Avenue, whetstone. The whole area has been obliterated of all the trees to make way for this development. The natural forest has been decimated. Please do not permit this development in our green natural forest space and save this precious green land for our future generations to come.	Any future proposal will take into consideration the need to protect mature trees within the site, and the adjoining Green Belt to the west and north and the Site of Borough Importance for Nature Conservation along the western site boundary.	No
CPRE	Site 53	Parts of the site are heavily wooded and these should be protected. Any development should not impact negatively on the adjoining Green Belt, which, as per ECC05 in the Reg18 document, should be protected and enhanced in line with the NPPF.	Any future proposal will take into consideration the need to protect mature trees within the site, and the adjoining Green Belt to the west and north.	No
TfL	Site 53	In line with the Council's ambition to help deliver an enhanced Northern line service in future, we strongly suggest protecting land for transport use at Allum Way (Site no. 53). We would very strongly support that: all the Planston land and some of the A1 Dairies retain designation as industrial land and are only brought forward for development if it can be done so in a manner that safeguards future transport operations. We are keen to continue working with the Council to ensure efficient operation of the railway and to identify and protect opportunities to enhance capacity in the future while supporting the Council to meet the borough's housing need.	Proposal revised to reflect change in TfL operational requirements	Yes
TfL CD	Site 53	TfL owns substantial part of the site, including station car park and warehousing to the north – see the 2017 'call for sites' submission. .TfL / London Underground may now need to retain this land for operational purposes, to serve a future Northern Line upgrade, and therefore cannot commit to promoting residential development at this point in time. The site allocation should reflect the likely requirement for TfL land to return to operational use, potentially also necessitating the acquisition of	Proposal revised to reflect change in TfL operational requirements	Yes

		some adjacent land - 20% mixed uses would not be adequate. Potential for mixed development with residential above operational structures could be investigated.		
Antony Laiker	Site 53	I wanted to express my strong disagreement about much of what I see in this document. In particular the plans for Site 53, very close to where I live. You should not be able to take away the green space that we have. We are meant to be conserving green areas not getting rid of them on a massive scale as proposed in these plans. Council has previously given permission for development of a site on St Margarets Avenue to build flats which is now derelict. All those trees gone and now a half built eyesore and monstrosity remains. If Planning are prepared to give such permissions then they should have confirmation that the developers have the financial ability to complete the work. I can assure you that a very strong campaign will be mounted by residents against Site 53 plans aided by Theresa Villiers MP. The scale of the proposal takes no account of the lack of infrastructure to cope with such expansion. The area is already overbuilt with several new developments still to be (fully) occupied.	With good access to public transport and town centre functions this site represents an opportunity for good growth. Any future proposal will take into consideration the need to protect mature trees within the site, and the adjoining Green Belt to the west and north and the Site of Borough Importance for Nature Conservation along the western site boundary.	No
Theresa Villiers	Site 53	Already traffic and access issues around Whetstone High Road.	It is considered that the development of this site presents an opportunity to improve these issues. More detailed work will be required for future proposals on Site 53.	No
HADAS	Site 54	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Thames Water	Site 55	There are Thames Water easements running through this site.	Proposal revised	Yes
Dr P. M. Ashbridge	Site 55	Re-assessment and re-provision of public car parking is proposed for this site if part of the existing car park is converted to residential. But care needs to be taken to retain the present restricted free parking at the entrance to Woodside Grange Road, where parking is at present prohibited 2-3 p.m. Mon.-Fri. This restriction prevents all-day commuter parking in this small area and is helpful for parents of the adjoining school, and for others not wishing to drive into central London congestion for short visits, study purposes, etc.	Initial planning considerations refers to the need to assess public car parking requirements and re-provide as necessary.	No
TfL CD	Site 55	This site could come forward within the five- year timescale. TfL is unlikely to re-provide car parking for station users, except for people with disabilities. The final sentence should be reworded: " <i>Public car parking requirements should be assessed and mitigation provided to encourage the use of public transport and active modes re-provide as needed.</i> "	Maintain timescale at 5-10 years unless further evidence of earlier development is available. Our approach to redevelopment of car parking is set out and justified through GSS12	No
Finchley Society	Site 55	Nothing should even be considered for Site no. 55 until that approved for Site no. 56 been completed and its effect on the setting of the historic and locally-listed Woodside Park Station has been assessed. Any development of Site 55 would have to be low-rise to retain some openness. Reducing the number of spaces for car parking must not be done lightly, and care must be taken to retain the present restricted free parking at the entrance to Woodside Grange Road, where parking is at present prohibited from 2 to 3 p.m. Monday-Friday; this restriction prevents all-day commuter parking in this small area and is very helpful to parents (of the adjoining school) and others	Proposal revised	Yes
CPRE	Site 56	This is a classic wooded area adjacent to Underground. While it is not designated it provides benefits for nature conservation and should be retained as vital habitat.	Proposal revised to reflect planning consent	Yes
TfL CD	Site 56	Council has resolved to grant planning permission for redevelopment of southern part of site (ref: 19/4293/FUL). Land to north of Station Approach is a longer term development opportunity, dependant on provision of satisfactory access for pedestrians, cyclists and vehicles. This may require significant redesign of one of the entrances to the western side of the bridge link at the station.	Proposal revised to reflect planning consent	Yes
Finchley Society	Site 56	A rather domineering redevelopment has now been approved for this site.	Proposal revised to reflect planning consent	Yes
Thames Water	Site 57	A critical trunk sewer runs through/close to this site which would need to be considered.	Proposal revised.	Yes
Finchley Society	Site 57	This area is a key element in the North Finchley Town Centre strategy. The section of Ballards Lane in question should be converted for pedestrian use as part of the restructuring of Tally Ho Corner. The development must fit with that vision, and not in any way pre-empt decisions on traffic flow.	This proposal reflects what was agreed through the North Finchley SPD	No

Dr P. M. Ashbridge	Site 57	Any proposals for closing or restricting traffic along this short section of Ballards Lane on the west side of the Tally Ho triangle would greatly worsen traffic congestion along the east (High Road) side of the triangle.	This proposal reflects what was agreed through the North Finchley SPD	No
Caroline Thomas and Bob Ganly	Site 58	Our worry here is the loss of public car parking, of which there is already too little in North Finchley.	Our approach to redevelopment of car parking is set out and justified through GSS12	No
Mayor of London	Site 58	Welcome the redevelopment of the car park. The re-provision of car parking should not be required in this town centre location	Our approach to redevelopment of car parking is set out and justified through GSS12	No
Client interested in North Finchley TC	Site 58	Has indicative residential capacity of 132 units and that proposals “ <i>should include retail and office uses with residential above.</i> ” Para 6.63 of SPD states that this site should “ <i>retain or reprovide existing retail frontages and provide residential units or other town centre uses above.</i> ” Our client questions why the proposed uses are limited to retail, residential and office, and suggests that wider reference to ‘ <i>other main town centre uses</i> ’ should be added to policy wording as per the SPD, NPPF and London Plan. It is also unclear why it is considered necessary to include the restriction of ‘ <i>30% mixed uses</i> ’ within proposed site allocation wording. Our client considers this to be overly restrictive and that it could prevent the delivery of sustainable development within North Finchley as required by the SPD. We request that this reference is removed. In addition, in order for the proposed site allocations to be in line with NPPF, London Plan and other Local Plan polices which seek to optimise housing density, the indicative residential capacity figures should be identified as minimum targets. This is especially important given my client’s capacity testing suggests this site can accommodate more than the 132 units identified. Finally, my client considers that there would be merit in extending the site allocation to include all properties fronting onto High Road between Percy Road and Lodge Lane which will ensure that potential of site is optimised.	Proposal 58 has been reviewed in order to be consistent with existing SPD.	Yes
Finchley Society	Site 58	The current office and mixed-use buildings are undistinguished but cover quite a large area. Consideration should be given to a low-carbon development, in which the existing structures are not demolished but integrated into a larger development that surrounds them, including adding one or more additional storeys. Demolition of buildings that can be refurbished is now seen as incompatible with minimising carbon emissions over the lifetime of buildings.	This proposal reflects what was agreed through the North Finchley SPD	No
HADAS	Site 59	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Amend	Yes
Finchley Society	Site 59	Central House is widely regarded as an over-sized eyesore. Its replacement by a building that is no taller would be desirable, even though this may not be the lowest carbon option (compared to refurbishment and reuse). Any replacement should meet highest standards of design and energy efficiency. Integration with the proposed redevelopment of TfL land around Finchley Central Station is crucial. The replacement building should be no taller than the current building, so as to prevent this relatively small and narrow town centre from becoming an impenetrable mass of tall and very tall buildings.	Finchley Central was identified in the 2012 Local Plan as a location where tall buildings may be supported	No
HADAS	Site 6	Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
CPRE	Site 6	Site encompasses a Site of Importance for Nature Conservation (SINC) which the council should make sure is retained.	Retention of the SINC is highlighted	Yes
Environment Agency	Site 6	The SFRA shows that a significant proportion of the site lies within Flood Zone 3b which is functional floodplain (the zone comprising land where water has to flow or be stored in times of flood). The 1 in 20 year flood extent is normally the basis for identifying areas of functional floodplain, and indicates an area subject to more frequent/regular flooding than the 1 in 100 year typically indicative of Flood Zone 3a. Residential development is classed as a more vulnerable use and should not be permitted or allocated in Flood Zone 3b (PPG Table 3). Expected this site to be discounted if the Sequential Test is appropriately applied. Very likely to object in principle to the site being allocated for housing or to a planning application proposing housing in Flood Zone 3b on this site. If there are other sites at a lower	Site has been subject to Level 2 SFRA and a sequential test.	yes

		risk of flooding with similar capacity that were discounted during the earlier Site Selection process than these should be reconsidered as part of the Sequential Test process to be undertaken. Any further consideration of this site must be made based on guidance in the Level 1 SFRA and a Level 2 SFRA.		
TfL CD	Site 6	TfL owns Burnt Oak station and a small amount of land to the rear – this should be reflected in the site allocation. TfL will require development on this site to improve interchange and contribute towards achieving station step free access (works are due to start in Winter 2020), capacity, access and facilities improvements	Updated to reflect TfL ownership and need to improve the station interchange and potentially contribute towards step-free access.	Yes
Finchley Society	Site 60	In line with some other sites in the Local Plan, redevelopment of this site should be approached with considerable caution. This is a relatively modern office block with a well-maintained exterior. What justification is there for demolishing it to build new offices? The climate impact of such demolition and new construction is usually unacceptable when compared with refurbishment and reuse. The existing buildings could be integrated into a new development which could incorporate additional mixed-use buildings. Given the need to focus on the climate emergency, previous policies in which demolition was the default for site redevelopment should be changed to an emphasis on refurbishment and reuse of existing structures. Whatever is built at this location should be no taller than the current building, to avoid turning North Finchley into a mass of tall and very tall buildings.	This proposal reflects what was agreed through the North Finchley SPD	No
Thames Water	Site 61	A critical trunk sewer runs through/close to this site which would need to be considered. There are TW easements running through this site.	Proposal revised	Yes
TfL CD	Site 61	TfL has leasehold interests at this site related to the bus station - TfL Spatial Planning will comment.	TfL Spatial Planning did not comment on this site in their response to the Reg 18. Their feedback was reflected in the North Finchley SPD	No
Mayor of London	Site 61	The re-provision of car parking should not be required in this town centre location	Our approach to redevelopment of car parking is set out and justified through GSS12	No
Client interested in North Finchley TC (Quod)	Site 61	Our client would also like to request that the identified indicative residential capacity of 281 units is set as a minimum target, and that the reference to “30% mixed uses” is removed. In respect of the residential capacity of the site, my client’s testing undertaken to date suggests that a site can suitably accommodate significantly more units which is consistent with London Plan and NPPF requirements to optimise density in town centre locations, well served by public transport accessibility.	The indicative residential capacity is provided to show potential housing deliverable at a site but is not intended to constrain proposals which can come forward with a lower or higher figure. The methodology for calculating residential capacity is set out in the Schedule of Site Proposals and has been carried out on a consistent basis between sites. The description of non-residential uses has been clarified.	Yes
HADAS	Site 62	Site 62 Tesco Finchley Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Amend	Yes
Finchley Society	Site 62	Demolition and reconstruction of this building would be incompatible with low-carbon development. The existing building should be retained, with one or more floors added on top. There is no reason to demolish such a relatively modern building which is of acceptable design and is in relatively good condition. The site is presumably already profitably used as a supermarket and offices. The reference to the site being in a ‘tall buildings location’ is misleading; there is only one tall building in the area, namely Central House. The establishment of Finchley Central as a tall buildings centre would lead to creation of unacceptable canyon effect along this narrow stretch of Ballards Lane as successive developments match each other in heights of over 8 storeys	Finchley Central was identified in the 2012 Local Plan as a location where tall buildings may be supported	No
Mayor of London	Site 62	Welcome optimising development on this site and development of the car park. Car parking is not required in this town centre location	Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 63	Add: The site lies on the possible route of Watling Street, a Roman Road, and should be subject to archaeological assessment.	Agreed	Yes
Finchley Society	Site 64	This incorporates all High Road frontages from junction with Friern Park’s south side to Stanhope Road. The first two or three premises (eg Café Nero, McDonalds) do not have heritage 1 st and 2 nd floor	This proposal reflects what was agreed through the North Finchley SPD	No

		facades, and could be redeveloped above for residential purposes, but in keeping with the suburban-style heights of this historic townscape. W. H. Smith, however, needs particular care, as it is one of the two bookshops in this Town Centre, being near Waterstones. Having a cluster of two bookshops is a retail asset for this town centre. The remaining 'shop-tops' in this site are locally listed; their first and second floors should be retained entirely and also not be overshadowed/dominated by new adjoining tall buildings. .		
Dr P. M. Ashbridge	Site 64	This incorporates all High Road frontages on its east side from Friern Park's south side to Stanhope Road. The first two or three (e.g. Cafe Nero, MacDonalds) do not have heritage 1st and 2nd floor facades and could perhaps be redeveloped above for residential purposes to a limited extent but in keeping with the suburban style heights of this historic townscape. The styles of the remaining "Shop-Tops" (the first/second floors) are all local heritage. They should be retained entirely and also not be overshadowed/ dominated by new adjoining tall buildings.	This proposal reflects what was agreed through the North Finchley SPD	No
Mayor of London	Site 65	Barnet should seek to replace the industrial capacity on this site, and as a minimum, the site should not be allocated so that policy E7C on non-designated industrial sites will apply to its redevelopment	There is no industrial capacity. This is a former mortuary	No
Thames Water	Site 66	A critical trunk sewer runs through/close to this site which would need to be considered.	Proposal revised	Yes
Finchley Society	Site 66	The curved Sea Rock facade at the junction of High Road and Woodhouse Road is locally listed and should be retained. It is a much-recognised landmark when approaching from Kingsway. Other frontages and buildings from Castle Road southwards and into Woodhouse Road should (i) be retained where heritage/good design is visible, and (ii) if renovated for residential use, done so at a moderate level and without tall buildings. This High Road-Kingsway-Woodhouse Road junction has two contrasting shapes at its corners - the more human and visually pleasant Sea Rock curve and Arts Depot frontage curve, and the sharp and over-dominant angles of the tall, badly-designed 'Finchley House and the 11-storey badly-designed block of flats visible behind the Arts Depot. these two tall angular misfortunes need somehow to fade into the architectural background (or disappear) rather than to be taken as a model for the future	This proposal reflects what was agreed through the North Finchley SPD. It has been updated to reflect the locally listed building	No
Dr P. M. Ashbridge	Site 66	The curved Sea Rock facade at the junction of the High Road and Woodhouse Road is on the Local List and should be retained. It is a much-recognised landmark. This junction has two contrasting shapes at its "corners" - the more human and visually pleasant Sea Rock curve and Arts Depot frontage curve, and in contrast the sharp, over-dominant angles of the tall, badly designed Finchley House and 11-storey block of flats behind the Arts Depot. Sea Rock and the Arts Depot frontage are visual "gateway" assets for the Town Centre. The extensive two red-and-white terraces extending northwards along the High Road from near the Sea Rock position are shown, in part, in the adopted SPD, page 43, with a caption: "Image 35. Buildings contributing to local character". These should of course also be retained as they are.	This proposal reflects what was agreed through the North Finchley SPD. It has been updated to reflect the locally listed building	No
Landsec (Indigo)	Site 67	Opportunity for additional parcels of land to be included as part of the wider redevelopment of the site; could include the hotel and restaurants to the north, alongside the Glebelands Indoor Bowls Club which offers the opportunity to improve existing facilities and maximise the potential of the site for housing. There have been discussions with neighbouring landowners and Landsec will continue to engage as the masterplan progresses. Opportunity to significantly increase the amount of housing proposed through the draft allocation, in addition to allowing for a greater mix of other non-residential uses. Early feasibility studies show that the site has the potential to deliver in excess of 600 homes within the current boundary. At this stage, LBB should not seek to require 40% of the site to be for the provision of mixed uses including sports and leisure, community uses and replacement parking. There should be flexibility built into the allocation and it should not be as prescriptive in order to allow the best use of land. The allocation should allow some flexibility for local services to be included in the redevelopment forming a complementary local centre to North Finchley. The stated development timeframe of 11 and 15 years into the Plan period is considered to be a conservative position: an application for redevelopment could	The housing figure on the schedule is indicative only and reflects both the low PTAL of the site and the desire to maintain leisure uses. The Council accepts retention of leisure uses at this site, with associated car parking due to the low PTAL values. The Council seeks thriving town centres as set out in Policy TOW01. Development of new town centre uses, or a new local centre at this site, will not be supported. Timeframe has been revised to reflect earlier delivery	Yes

		be submitted within the next 12-18 months, meaning the site could be delivered in the first five years of the Plan. Landsec is drawing up masterplan options and is committed to bringing forward the redevelopment of the site and commencing formal pre-application discussions in near future.		
LB Brent	Site 7	Western part of site faces towards LB Brent's Cricklewood Town Centre which is a Primary shopping frontage. Therefore it is recommended that any development coming forward should maintain active frontage towards the Cricklewood Broadway.LB Brent wish to be consulted on the Cricklewood Masterplan and ideally would like early engagement with local Brent councillors to occur in its development. Initial Planning considerations: Any development proposal should ensure the provision of an active ground floor frontage along Cricklewood Broadway.	Agreed. Text revised This will be reflected in our Statement of Common Ground	Yes
HADAS	Site 7	Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
Thames Water	Sites 2,8, 30, 53, 56, 61 & 62	The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Proposals revised to reflect the potential for wastewater network capacity issues.	Yes
HADAS	Site 8	Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
Historic England	Site 8	Does not mention the Mapesbury Conservation Area which lies to the south in neighbouring Brent. It is important to consider the cross border impacts on the historic environment from the outset. The Brent Conservation Character Appraisal should form part of the plan's evidence base, where identified key views in both the conservation areas should be mentioned specifically within the policy alongside the need to conserve their setting.	Agreed	Yes
LB Brent	Site 8	LB Brent wish to be consulted on the Cricklewood Masterplan and ideally would like early engagement with local Brent councillors to occur in its development.	We will consult with Brent on any planning framework proposals for Cricklewood This will be reflected in our Statement of Common Ground	No
HADAS	Site 9	Add: CDH08 Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
TfL CD	Site 9	TfL would need to work with the Council and other landowners to secure provision of adequate pedestrian, cycle and vehicular access to the site. Development timeframe could be brought forward (to, say, 5-10 years) subject to securing access.	Site has been subject to Level 2 SFRA and a sequential test.	Yes
Environment Agency	Site 9	The SFRA shows the majority of the Flood Zone 3 extent is also Flood Zone 3b from the Silk Stream river. The backland location and difficult access also make the site vulnerable. Do not consider this is a sensible location to propose housing. Providing appropriate floodplain compensation would be also be major challenge. Records show that flooding from the Silk Stream occurred in this area in summer 2016 with property flooding as a result. There was also garden and road flooding in summer of 2016. The area around Colindeep Lane also regularly suffers from surface water flooding. Expected this site to be discounted if the Sequential Test is appropriately applied. Very likely to object in principle to the site being allocated for housing or to a planning application proposing housing in Flood Zone 3b on this site. If there are other sites at a lower risk of flooding with similar capacity that were discounted during the earlier Site Selection process than these should be reconsidered as part of the Sequential Test process to be undertaken. Any further consideration of this site must be made based on guidance in the Level 1 SFRA and a Level 2 SFRA.	Site has been subject to Level 2 SFRA and a sequential test.	Yes
Donato Peduzzi	Site 9	Concern and shock seeing Colindeep Lane. Precise location not clear from map but area consists of the wooded area running from the 'White Bridge' stretching along the stream bank behind Colindeep Lane properties (nos 150 - 168) behind Chalfont Court, 170-178 Colindeep Lane, Marlow Court and turning behind Sheaveshill Avenue (nos 114 to 152). Please confirm to me whether this is in fact correct or provide me with the exact mapping details. Assuming that my assessment is accurate it should be	Site has been subject to Level 2 SFRA and a sequential test. The site proposal seeks the retention and enhancement of its biodiversity including the mature trees. Any development that comes forward must reflect its location as part of a Green Chain	Yes

		removed immediately from any consideration for future development maintaining it as a Natural Conservation Area for the following points: This small stretch of woodland is the only natural piece of woodland in this area. It is a totally secluded habitat and not accessible to the general public; It is therefore a natural habitat for an extensive variety of wildlife and birds, such as woodpeckers, jays, sparrow hawks, finches, chaffinches and other breeds. Many of these species do not thrive in standard park environments and have therefore established themselves here over many years. Families of Herons and ducks also live and annually nest along this stretch of the stream; area has a large number of mature trees which provide habitat and oxygenate our air in an increasingly highly overdeveloped 'concrete jungle' neighbourhood; Within the woodland there are other deep natural water courses which are smaller offshoot tributaries running through it from the Silk Stream; There is no logical access point into the area suitable to accommodate a residential area or to allow proper and easy access for the emergency services. It is inconceivable that this wanton destruction of a natural habitat for the sake of just 138 dwellings could even be considered by the Council when there are many brownfield sites more suitable within the borough. Please leave it alone, leave it to Nature and stop any actions by TFL.	along the Silk Stream as well as the adjoining Site of Borough Importance for Nature Conservation in the design of the proposal	
Nick Burgess	Site 9	I would like to see this land protected and not built upon as it has been used as free land for over 50 years to my knowledge it is a wildlife corridor.	See response above to Donato Peduzzi	Yes
CPRE	Site 9	This site would result in loss of green space in a densely developed area. Green space should be retained to improve open space access for the growing population.	See response above to Donato Peduzzi	No
Sport England	Sites 1 & 2	Sport England objects to any sports facilities that might be lost, for example Church Farm Leisure Centre. Also proposals for new sports facilities, such as a replacement sports pitch at North London Business Park, should be in line with strategic identified needs and not be vague in the type of playing pitch(es) required. It is, therefore, questionable if this new pitch is in line with identified needs.	Proposal for Site 1 highlights re-provision in new leisure centre. Site 2 has been updated to reflect the planning consent for NLBP	No
Wade Miller-Knight	Sites 11 & 12	Object to the proposed suitability for tall buildings (out of existing context) and higher density than other sites (such as 46 and 50) – noting character is protected better in Burnt Oak, East Finchley, Finchley Golders Green and Hendon.	These sites were originally identified as development opportunities in the Colindale Area Action Plan (2011). CDH04 identifies locations that may be suitable for tall buildings. This includes the Colindale Growth Area and the A5 Major Thoroughfare.	No
Donato Peduzzi	Sites 11,12 & 13	Very surprised to see the additional sites for redevelopment in Colindeep Lane namely McDonalds (12), KFC (11) and the Public Health England unit (Colindale Avenue)(13). Colindale is undergoing a huge transformation - current developments around Colindale Station will put a huge strain on resources such as local transport, traffic, health, childcare and youth centre facilities. It seems that Colindale together with the Sainsbury development that is underway is reaching saturation point. Additional housing/flats along Colindeep Lane will create even more constant bottlenecks and the notion of a car free or car reduced environment is a pipe dream. Just building upwards will create social problems for future generations. However, redevelopment of these already developed sites is inevitable but strongly suggest strict height restrictions to the tower blocks built. One urgent action needed is to make Colindeep Lane a double yellow line zone - fast reaching the point of constant jams preventing buses/ambulances/lorries from freely travelling along the road. This area has always been designated a flood risk. In view of current weather patterns and the recent severe flooding across the UK this risk would increase further with any housing development. Woods act as a natural sponge for excess rainwater.	Sites 11 and 12 were previously identified in the Colindale Area Action Plan – adopted in 2011. Public Health England plan to vacate their site within the lifetime of the Local Plan. Development proposals will have to address constraints such as flood risk from the Silk Stream. In terms of traffic congestion the Local Plan will expect proposals to reduce car usage and through improvements to infrastructure increase walking and cycling as a mode of transport. The Infrastructure Delivery Plan will address provision of health and community facilities.	No
New Barnet Community Association	Sites 16 & 22	A number of sites in New and East Barnet could cause planning blight as owners will not want to invest with potential for redevelopment. Designation as TC is contributing to development that is not suitable for the area.	The London Plan identifies New Barnet as a town centre and sets the framework for the Local Plan. The status of sites previously highlighted in the New Barnet Town Centre Framework has been elevated by designation in the Local Plan. This should help spur development.	No

Patricia Prichard	Sites 23 & 24	<p>I would also oppose the inclusion of the site of the former Bobath centre. There is a desperate need to protect the remaining quality of life for Londoners and to protect the environment which is apparently being ignored in policy. I should like to express very strong opposition to the proposal to include the car parking site at East Finchley as potentially available for development. The persistent erosion of quality of life for Londoners exemplified by this sort of irrational and irresponsible proposal is highly damaging. This site is in active use and remains vital to the local community and commuters. London has been transformed in the last thirty years or so from a very liveable city into one in which it is no longer nearly as pleasant or desirable to live. Enough is already far too much. The outer suburbs of London still depend on car use to a very significant extent and the removal of important parking spaces like this one would be completely unacceptable. East Finchley has already been much spoilt by a series of unsuitable overdevelopments which have had an extremely adverse impact on the local environment and residential amenity. There appears to be a fundamental failure by policy makers to appreciate that you cannot pay lip service to climate change, declare a climate emergency and then carry on with massive amounts of house building – concrete and cement are huge contributors to carbon footprint. Development is enormously destructive to the habitat and local ecology and to the mental health and well-being of existing residents, even in cities. There is a presupposition being made here that the density of London needs to go up still further and increase exponentially which is rash and ill founded. Supply of land is finite not an infinite resource.</p>	<p>By managing growth the Local Plan can help retain the qualities that attract people to live and stay in the Borough.</p> <p>East Finchley Station lies partly within, and partly adjoining, East Finchley Town Centre and is highly accessible by public transport. It is therefore appropriate to promote sustainable development that serves the town centre and promotes housing delivery. This includes assessing public car parking requirements must be assessed and re-provided as needed. Mitigating climate change is a fundamental part of this Local Plan.</p> <p>Through the Local Plan we can ensure that we build more sustainably, making more efficient use of land, accommodating the needs of existing residents while considering the requirements of future generations.</p>	Yes
Finchley Society	Sites 23-26	<p>These 4 sites should be considered together and a strategic masterplan prepared to address the High Road and Station entrance and land around and both sides of the High Road, forming as it does a major entrance to East Finchley. There are significant listed buildings both on these sites and close by, the Phoenix Cinema, giving historical importance to this area. Site 23 The Bobath Centre is a listed building and this includes its site. The listed building fronting onto East End Road has already been developed as a nursery, with a portion of the site to the south fenced off, presumably for sale as housing opportunity. This site has a key pedestrian route through to the station car park site and thus links to site 24 and the transport links of bus and tube. There are significant changes in level at the west and south boundaries of the site. Site 24 The notion of separating the station use from potential residential use is welcomed. The listed East Finchley Station is an important building at the entrance to East Finchley and views of the station building, the iconic statue of the Archer, and the bridge, viewed from both sides are key and important to the townscape. The relationship of the station entrance to the bus stops, entrance to Cherry Tree Wood across the road and the development of site 26 opposite must all be considered together. Improvements to the public realm to greatly improve pedestrian movement across the road in both directions, access and environment at the bus stops, and pedestrian and cyclist movement to the Cinema and shops on the High Road Site 25 The existing building is significant in the group of tube station buildings and has an embodied energy in the form of the substantial brick building. This site is opposite the notoriously difficult junction with Bishops Avenue and has a fine view of the listed station building at high level, the statue and the bridge. The opportunity should be taken when developing this site of substantially improving the pedestrian and cycling experience at the junction with Bishops Avenue and signalling the gateway to East Finchley Site 26 Park House. The red boundary on the map has been drawn incorrectly and includes the site of Valona House to the north, currently not in council ownership and already having received permission for development. Park House itself is set back from the road and has an area of green to the front with fine trees on it. This leads to the entrance to Cherry Tree Wood. The current building line should be respected and retained, and the green space to the front protected and maintained and improved. This should be linked to the entrance to Cherry Tree Wood and make the whole contribute positively to the street scene. In the first instance the existing building should be considered for refurbishment, in line with environmental policy.</p>	<p>Although there are no plans at present to progress an area framework for East Finchley Town Centre this could be considered further.</p> <p>Sites 23 to 25 – proposals updated Site 26 – Boundaries revised and proposal updated</p>	Yes

TfL	Sites 24, 30, 44, 47, 55	As set out above, re-provision of parking should be minimised, consider the impacts of re-providing parking and justifiable in its own terms, not due to its prior availability. Any assessment of 'need' should take into account that the availability of parking creates demand for it and the extent of bus alternatives for accessing the line in question. Planning for a sustainable London must be based on demand management rather than predict and provide.	Our approach to redevelopment of car parking is set out and justified through GSS12	No
TfL CD	Sites 27 & 28	<p>There is a small amount of TfL-owned land within Site No. 27 and the ownership section should be updated to reflect this. TfL CD has been working with the owner of the Broadwalk Shopping Centre, whose landholdings comprise the majority of Site No.27, to look at options for a comprehensive development across both sites and have undertaken an initial feasibility study. Given the importance of these 2 sites they should be incorporated into one site allocation. Must acknowledge the need to retain operational transport facilities and land including the bus station, stands, LU station and sidings. However, there may be scope to explore relocating eg. the bus station and / or stands if it would improve interchange, access and transport operations. Using the density matrix from the London Plan (2016) is no longer considered the best method and has been removed from the Draft NLP. In addition the site area included in the site allocations are wider than those that have been considered as part of the feasibility exercise we have undertaken, and it would be useful to understand what assumptions have been made to reach the figures in the site allocations.</p> <p>It is not clear how the 'Proposed Use type/s' is calculated; it is suggested that for more complex and strategic sites the reference to the % is removed and wording is updated along the following lines: "Proposed use type/s: residential with 30% mixed uses (transport, retail, office and community) <u>transport and town centre uses to strengthen the high street including retail; food and beverage; leisure; office; community and public realm / open space.</u></p> <p>Description of surrounding context should also refer to other nearby taller buildings on the high street including the consented Premier Place (19 storeys) and Premier House (14 storeys). For clarity the following amendment is suggested: "Edgware Town Centre Framework (2013) provides further guidance <u>which will be superseded by further guidance to be provided in the emerging Edgware Town Centre SPD once this is adopted.</u>"</p>	<p>Site 27 updated to reflect TfL element of ownership.</p> <p>The Council seeks the coordinated redevelopment of both sites and is preparing the Edgware SPD to support this approach. The Council will consult with the major landowners on the potential or otherwise to take this forward as a single site.</p> <p>The density matrix is a widely-recognised approach to assessing the potential quantum of housing units. Calculations were run on the basis of entire site areas – the Council will consult further with TfL on whether to include the track and station areas within the envelope suitable for residential and mixed-use development.</p> <p>Providing a percentage for non-residential floorspace gives a broad quantum on which uses the Council would like to come forward.</p> <p>Text updated to provide more detail on other uses and to include references to Premier House and Premier Place as well as highlighting that the SPD will supersede the 2013 Framework.</p>	Yes
Milan Shah	Sites 40 & 41	I wish to raise concern over the proposed new build of student accommodation in the area The Meritage Centre, PDSA, the garages on Prince of Wales Close and the Fuller Street car park. The local parking situation is already very strained especially during normal university hours (during the day Mon to Fri). There are often students forming queues with their cars for parking spots in this area which makes it extremely difficult for residents to park their car. The parking areas that are controlled by private company do not enforce parking restrictions and this causes a lot of problems. If the new build does go ahead, then serious thought must be taken into the parking situation to ensure there is enough parking for all residents.	The Local Plan at Chapter 11 sets out how a CPZ could be introduced. This would be in consultation with residents, to ensure existing residents have access to parking in their own area.	Yes
LB Barnet Estates (GL Hearn)	Sites 40 & 41	On behalf of Middlesex University and LB Barnet ESA Architecture estimate that both Site Nos. 40 and 41 have a combined indicative capacity for 235 student rooms.	Proposals revised	Yes
Sharon Rind	Sites 40 & 41	Expansion of Middlesex university student accommodation under your plan, of which I am vehemently opposed to, namely: Sites 40 and 41 The redevelopment of The Meritage Centre, PDSA, garages and Fuller Street Car Park to be made into student accommodation. Middlesex University is ruining what used to be a beautiful area. The students take up parking spaces meant for residents in Prince of Wales Close, NW4, they are aggressive and abusive, they throw litter everywhere and can be seen taking drugs. As Prince of Wales Close has no CPZ (which the residents are desperately fighting to get), the students drive in to University and park in that street-therefore Barnet Council, by not implementing CPZ, is encouraging more traffic in the area when these students could access the 5 bus routes,	See response above to Milan Shah	Yes

		Underground and Overground trains that are all around the University. Local residents need to be able to park in their street, as it is there are not enough parking spaces for all the local residents-we need the garages land and Fuller Street Car Park, not more students in student accommodation.		
Trevor Layne	Sites 40 & 41	I am shocked and somewhat in disbelief that Barnet Council would see it fit\appropriate to put existing and long term residents last in favour of redevelopments for Middlesex University. I wish to register my STRONG OBJECTION to this. The last thing this area needs is more student accommodation. Students are abusive and have little regard for residents and the area in general. In nearly 20 years of living in the area\Prince of Wales Close Estate, particularly in the last couple of years, I have seen the demise of area. Barnet clearly no longer cares. There is an increase in rubbish dumped all around, drug deals being visibly made\conducted around by the garages, graffiti, vandalism of building access doors\windows, the list goes on. Where will these additional students park? Residents are paying rents on garages they cannot use for student cars in front of them. We struggle as residents now to park our cars as it is. We raise the issue and just receive excuse after excuse from Barnet as to why there is no current parking scheme in place. Talk about infrastructure and finance doesn't appear to be an issue for this proposed redevelopment! Does Barnet really care so little about residents????	The Burroughs and Middlesex University SPD will create a more focused planning framework for the area allowing for the issues raised to be addressed in more detail	Yes
John O'Brien Kathleen O'Brien	Sites 40 & 41	We are writing to object about the plans to redevelop the Meritage Centre, the PDSA, the garages on Prince of Wales Close (NW4 4QN) and the Fuller Street car park into student accommodation for the University of Middlesex. The increasing presence of the University is a blight on our community, as unfortunately a number of students are abusive, leave litter and (in some cases) take, exchange and deal drugs in the recesses of the buildings. We have always been diligent in paying our Council Taxes and making positive contributions to the local community and economy and now we find that it is becoming impossible to park anywhere near to our home (10 Prince of Wales Close). This matters, as we are both 78 years and many of our neighbours also fall into the elderly age bracket. A far, far better solution would be (as we and others have been keen to campaign for) would be CPZ. We hope you move towards this as soon as possible and not be in thrall to the University.	See response above to Milan Shah	Yes
Madeline Lester	Sites 40 & 41	I have received notification with regard to the above and wish to say I strongly object to these proposals. I live at No.20 Thornbury Prince of Wales Close and we have enough trouble what with car parking problems, which I might add we have been talking about for nearly two years, any further extension here is going to cause immense bother to all who live here.	See response above to Milan Shah	Yes
Barbara Lowe, Martha Lowe	Sites 40 & 41	The proposed development of Student Accommodation for Middlesex University. You have delayed our petition for CPZ. We already have students parking on our grassed areas, blocking our cars, we have parents dropping off children for school, nursery, children walking and loitering on the estate to get to school. Traffic moving at speed where it is unsafe. <i>We need CPZ not Further student accommodations.</i>	See response above to Milan Shah	Yes
Mark Josephs	Sites 40 & 41	Strongly oppose any development plans for parking which are being discussed regarding Middlesex university students who are abusive litter throwing drug users. As it is ,they take residents parking spaces ,with no regard to people who actually live on the estate. When they are confronted by residents they become aggressive and just laugh .The university should be held responsible for the already impossible situation which the residents find themselves in and most certainly not be discussing any further parking development for students within the prince of Wales close all the parking for the students should be on student grounds not residents grounds .	See response above to Milan Shah	Yes
National Grid	Sites 5, 11, 12, 14, 27, 30, 46 & 49	National Grid assets have been identified a number of sites that are crossed by or are close to proposed development sites. Asset locations are shown on plans for these 8 sites	Protection of National Grid assets will be ensured during any development of these sites.	No

Woodside Grove Management Company Ltd	Sites 55 and 56	The sites are in very close proximity to the back gardens of family houses and apartments' in the area as well as to the London underground (Northern line) train tracks. A more detailed plan is needed to achieve well designed, high quality streets, spaces, public realm and buildings; and seek to achieve the highest possible standards in sustainable design. Land available round the station should be considered for the benefit of all the community and certainly existing residents and not using it to meet a housing metric for the whole country. The sites should benefit all the community, with facilities such as nursery schools, retail, bicycle storage, playground and garden ground for children, etc. In the past 10 years there have been many residential developments in the North Finchley area. This is creating a serious burden on the already pressurised local infrastructure – on Woodside Park tube station, on the drainage, sewage, traffic congestion, density levels, and the environment. TFL and the planning authority should impose planning conditions on any development on TFL land to ensure the main objectives for the community are captured Removing car parking but continuing to attract additional vehicular movement to the area is highly undesirable; if vehicular movement is to be retained then appropriate parking under any development should be required. The Planning Committee has already considered Site 56 in the Draft Local Plan. It is unclear to many members of the public why this site was even considered prior to the obligation to consult on all sites in the Local Plan. The question must be why that applicant was allowed to submit plans for this site prior to the consultation process.	Identification of this site in the Local Plan demonstrates that the Council considers it suitable for development. Proposals must demonstrate compliance with good design policy requirements, including distancing to neighbouring properties. Both sites are highly accessible for public transport and local services, and provide sustainable locations for residential development. Financial contributions towards infrastructure provision are required to mitigate the impact of development. The high PTAL levels reduce the need for car use. The Local Plan supports more sustainable transport modes to reduce car use. Controlled Parking Zones (CPZs) can be established and enforced by the Council to control on-road parking.	No
Mirit Ehrenstein	Sites 55, 56 & 57	Residential developments in areas which are already heavily residential. Concerns expressed with the proposed development of Site No. 56 when it was the subject of a separate planning application still apply to this site and the others. Streets have no capacity for additional parking or any other facilities. Of particular concern is the proposal to build on the current Woodside Park car park. Commuters will use even more residential roads around to park their cars, increasing the congestion in the area. Road is already almost impassable due to the building works, and once completed, will have to absorb the additional traffic they will bring. Two developments currently taking place in Holden Road, just by Garden Court, are still prohibitively expensive, and too many units are being squeezed into the spaces.	The sites are highly accessible for public transport and local services, providing sustainable locations for residential development. The high PTAL levels reduce the need for car use. The Local Plan supports more sustainable transport modes to reduce car use. Controlled Parking Zones (CPZs) can be established and enforced by the Council to control on-road parking. Although Local Plan policy sets out affordable housing requirements it cannot control the market price of new build housing.	No
LB Harrow	Sites, 5,6, 27 & 28	Allocated sites would seek to deliver a significant amount of development, which would be in close proximity to boundary with LB Harrow. Harrow does not object to the sites, given pressures to deliver sufficient amount of housing and employment floorspace. Furthermore, the sites are located within, or at least adjacent to town centres, or along the A5 which has been identified (within the LB Barnet Plan) as a sustainable location for more intensive development. LB Harrow agree that such locations are ideal for more intensive developments, ensuring that the most efficient use of the sites are achieved and delivered. Notwithstanding this, the quantum of development set out in the allocations is likely to have some impact on LB Harrow & its residents. Whilst it is acknowledge consultation on development at these sites would occur at planning application stage, LB Harrow would welcome further discussions on the redevelopment of these allocated sites.	We welcome this support from LB Harrow. This will be reflected in our Statement of Common Ground	No
Roger Chapman	New Site	Add new site 68 to Annex 1 – Schedule of Site Proposals Wastelands	The Council refers to its previous response on Barnet Wastelands	No
London Diocesan Fund (Iceni Projects)	Unallocated Land	Mount House School is a highly successful independent school which provides additional educational choice to the residents of the Borough. It has aspirations to expand their existing facilities and we consider the adjoining Diocese land provides an ideal opportunity to achieve this. The provision of additional sporting facilities is a key aim of the school and these could be made available to the local community and help meet some of the shortfalls in leisure facilities identified in the Council's Indoor Sports and Recreation Facilities Study. For example, the School aspires to deliver a new sports hall and	The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. Barnet has the capacity to deliver a minimum of 35,460 new homes from 2021 to 2036. This is	No

		swimming pool which are also identified requirements within the Indoor Sports and Recreation Facilities Study. By removing the site from the Green Belt and allocating it for these purposes the Council could meet its twin objectives of enhancing its educational offer to parents and increasing community access to leisure and recreation facilities for which there is a shortfall. In addition to educational provision and leisure facilities on site, we consider that the wider site is suitable for delivering much needed family housing. The site is in a broadly sustainable location; does not contribute towards the five aims of the Green Belt set out within the National Planning Policy Framework (NPPF) and is located within an area of compatible land uses. As a minimum, a degree of cross-subsidy will be required to deliver the expanded education and leisure facilities at Manor House School. This would be delivered by residential development on the site which, as we have set out above, would be an appropriate and suitable location for new housing.	expressed in Policy GSS01 and subsequent policies GSS02-GSS12 demonstrate how we will deliver this. The Council has conducted a Green Belt and MOL Review which demonstrates no justification for making significant revisions to existing Green Belt and MOL boundaries.	
LB Barnet Estates	Unallocated Land	Middlesex University and LB Barnet seek the allocation of 1-3 Burroughs Parade for a student housing led mixed use scheme as part of its drive to improve the quantity and quality of student accommodation within the vicinity of the Hendon Campus. This site is owned by the University and measures 792 sqm with an indicative site capacity of 61 student rooms.	The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. This does not preclude this site coming forward for redevelopment in line with the policy framework outlined in this Plan.	No
LB Barnet Estates	Unallocated Land	Middlesex University and LB Barnet seek the allocation of 13-21 Church End for a student housing scheme as part of its drive to improve the quantity and quality of student accommodation within the vicinity of the Hendon Campus. The capacity study provide by ESA Architecture indicates that this site could accommodate 41 student beds.	See response above	No
Middlesex University	Unallocated Land	University requests that the Council consider the allocation of the land at 13-21 Church End for a student housing scheme to further support its drive to improve the quantity and quality of student accommodation within the vicinity of the Hendon Campus. Capacity studies undertaken as part of the Hendon Regeneration Project indicate that this site could accommodate 41 student beds.	See response above	No
London Diocesan Fund	Unallocated Land	The key points to extract from these representations are as follows: <ul style="list-style-type: none"> • The Council should plan for a higher level of housing need based on the Standardised Method; • Releasing Green Belt sites will be a necessity to meet housing need in the area, including aiding the delivery of family sized homes and important infrastructure such as schools. • Rectory Farm is a deliverable and available site which is suitable to accommodate an extension to the existing Mount House School and deliver much needed housing to meet the Council's short-term needs whereby the majority of growth is reliant on strategic sites. • The Diocese are in discussion with Mount House School to provide part of the site for a sports centre. The school has confirmed they will support community access to the facilities for which there is a large shortfall in the Borough. The site is located to the north east of Barnet, adjacent to Mount House Independent School, situated to the north of Camlet Way, Monken Hadley. The site is currently designated as Green Belt in Barnet's Local Development Framework. The site benefits from being in an accessible location. Hadley Wood train station is a 15-minute walk from the site, with trains running directly to both London Moorgate and Welwyn Garden City every 10 minutes. Camlet Way Bus Stop (immediately in front of the site) is served by bus route 399 and Broadgates Avenue bus which has several other regular bus services is within close proximity. Monken Hadley/Chipping Barnet town centre is approximately 0.9 miles or a 17-minute walk, close to various existing shops and services. Mount House operates successfully, therefore this location is considered appropriate for this use. The site is also in close proximity to Moken Hadley C of E Primary School. The Diocese has previously promoted the site through both the Call for Sites (2017) and the Growth Strategy (2019). In addition to this, representations to the Special Educational Places Plan Consultation Document stating that the site would be available to provide a temporary facility for the Windmill Free School before its opening in 2023 or 2024. An application was submitted on the south 	The Green Belt and MOL Review demonstrates no justification for releasing land designated as such or making significant revisions to existing Green Belt and MOL boundaries. The draft Local Plan demonstrates how Barnet will accommodate growth through Policies BSS01 and GSS01.	No

		west of the site for the erection of two single storey buildings and associated hardstanding for use in association with existing riding school/ livery stables following demolition of existing farm buildings (Ref: B/04272/20). Permission was granted in 2011. This was not implemented, but demonstrates the suitability of the site for additional built form. In 2019 an application (19/0957/FUL) was approved in 2019 for a two storey expansion block on Mount House School. This application highlights the School's intention to expand from its current capacity of 160 pupils up to 300.		
Readysset Resources Ltd (SMB Town Planning Ltd)	Unallocated Land	This is on behalf of Readysset Resources Limited, the freehold owners of no.133 Brent Street. This is a vacant and derelict 'L' shaped site extending to an area of 0.1058 hectares as delineated, lies within Brent Street Town Centre and consists of areas of hardstanding and overgrown vegetation and is currently used for car parking on an informal basis. The site's frontage to Brent Street is boarded up. Vehicular access into the site is from Brampton Grove. The site has been subject to a number of previous applications for a mixed-use development. Indeed, in April 2018 the Council granted planning permission for the erection of a 5-storey building with basement to provide commercial floorspace (A2 - Professional and Financial Services) on the ground and basement floors with 9 self-contained flats above together with the provision of basement car and cycle parking (ref: 17/7497/FUL). Paragraph 3.3.6 of the Council's Site Selection Background Document refers to the criteria of allocating housing sites as those of at least 0.1 hectare in area, " <i>capable of potentially delivering a minimum of 5 units</i> ". Furthermore, the site is available and deliverable with the potential to come forward for development during the plan period up until 2036. We disagree with the Council's approach that because the site has a valid planning permission it is likely to be included in the Housing Trajectory (to be published in the forthcoming Annual Monitoring Report for 2018/19) and does not need to be allocated in the Schedule of Sites. However, a Local Plan allocation for a site with a planning permission enhances the prospects consent particularly in the prevailing uncertain economic climate. Given the site's town centre location where the principal of a mixed-use scheme is acceptable, it should be allocated for residential and commercial development to include a range of appropriate Class A and B1 uses.	This site has a valid planning permission (2018) and forms part of the development pipeline. The principle of development on this site has therefore been accepted.	No
Harrison Varma Ltd (Savills)	Unallocated Land	Two new sites being proposed which are not allocated in the Reg 18 consultation document. The representations are framed by the potential to deliver further residential development from these sites which are summarised briefly along with their location plans. 98 Great North Road N20NL The property is a standalone purpose-built brick office building. Arranged over 3 storeys, the property fronts Great North Road to the west with an embankment for the Northern line Underground immediately to the rear (east) of the building and its existing surface car park. Immediately north of the site is the vacant East Finchley Substation that has been designated as Site No. 25 in the proposed Site Allocations. In 2017, prior approval (Ref: 16/7819/PNO) was given to change the use of the existing building from office to residential use as permitted development. Although this approval was not implemented, the permitted development right continues to apply and a change of use to residential could still be brought forward. A separate planning permission was also granted in 2017 (Ref: 17/0285/FUL) to allow the upward extension of the existing office building to provide additional third and part fourth storeys. The Towers and 1-5 Ardent Court Gardens, The Bishops Avenue N20BJ The Towers and Arden Court Gardens are adjacent sites on The Bishops Avenue. The Towers is a single dwelling house and Arden Court Gardens features a total of five detached dwellings set out around a cul-de-sac. The sites lie on the eastern side of The Bishops Avenue, surrounded predominantly by large single dwelling houses set within distinct plots. The total area of the two sites is approximately 1.63 hectares. None of the properties have not been occupied for a considerable period of time. The site falls within the Bishops Avenue subset of the Hampstead Garden Suburb Conservation Area. The Towers is noted as a positive contribution to the Conservation Area whereas the properties of Arden Court Gardens are noted as a 'neutral area', in part due to their 1980s style not reflecting prevailing character in the local area. Though maintaining the considerable openness	98 Great North Road N20NL The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. This does not preclude this site coming forward for redevelopment in line with the policy framework outlined in this Plan. The Towers and 1-5 Ardent Court Gardens, The Bishops Avenue N20BJ Principle for development has been established within the Hampstead Garden Suburb Conservation Area. That remains the overriding context for the future of this site.	No

		and tree planting within the site, planning permission was granted in 2015 (Ref: F/04857/14) for a residential development that replaced all of the existing buildings on-site with three separate blocks to provide a total of 44 flatted residential units. The development also included significant subterranean development to accommodate car parking and ancillary facilities for the blocks. Though this permission has now expired, the development principles that supported the previous approval remain relevant. A location plan for each site is attached. It is expected that each site could be brought forward for residential development. This could be further supported by a policy context that is supportive of optimising residential development and most particularly from brownfield sites delivering higher density development.	
Casa Bella Developments	Unallocated Land	<p>The circa. 0.8 ha site is located approximately 150m from Edgware Underground and Bus Station. It has excellent access to public transport as reflected in the site PTAL of 6a (where 0 is least accessible and 6b is most accessible). The site is located within Edgware Major Town Centre and it has excellent access to jobs, amenities, services and shopping. The site does not have historical value nor is the site located within close proximity to a heritage asset; the site is not located within, or adjacent to, a designated Conservation Area; the closest statutorily listed building is the Parish Church of St Margaret (Grade II), located approximately 400m to the south of the site. Part of the site falls within Flood Zone 2 and 3. Following detailed assessment and liaison with the Environment Agency it has been demonstrated that flood risk to future occupants can be suitably mitigated. In March 2019 planning permission (ref: 18/2839/FUL) was granted for the redevelopment of the site to provide 52 dwellings. Basement car parking formed part of the proposals providing a total of 36 car parking spaces. Site Allocation The draft Local Plan at paragraph 15.1.7 states that sites with planning permission are not included within the Schedule of Site Proposals but instead are included within the Housing Trajectory. Given that the extant planning permission has not been implemented, the Local Plan should specifically allocate the site in order to provide support for redevelopment and intensification. This would provide an appropriate and positive planning context for future applications should the extant permission remain unimplemented. The site has potential to deliver a significant number of residential dwellings on a brownfield site in a sustainable location. NPPF promotes the effective use of such underutilised brownfield sites to deliver homes. For this reason an allocation for residential intensification should be provided in the Local Plan. Residential Intensification Local Plan seeks to deliver between 2021 and 2036 a minimum of 46,000 new homes (3,060 per annum). The Council has set this target following the preparation of a SHMA. This target is well below housing need when calculated using the Government's Standard Methodology (-applying this methodology the Council is required to deliver 4,126 new homes per annum). Taking account of this significant shortfall, it is important that residential intensification of sustainable locations such as the subject site should be supported within a positive planning framework. In this context, the Council should explore further optimisation across the Edgware Growth Area and the borough more generally. Furthermore, should the Council maintain a minimum housing target which is not in conformity with the Government's Standard Methodology, the policies of the draft Local Plan should be worded to support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality. Of the Council's planned housing delivery, 5,000 new homes (13% of Borough wide targets) are proposed to be delivered in the Edgware Growth Area alongside better connections, new public space, food, drink and leisure opportunities. The 'High' residential growth potential of Edgware town centre is identified in the draft New London Plan (NLP). Furthermore, the draft NLP promotes making the best use of land within town centres by optimising residential growth potential, with priority outlined for well-connected sites. The NPPF also recognises that residential development often plays an important role in ensuring the vitality of centres and therefore encourages residential development on appropriate sites. The growth of Edgware Town Centre with residential intensification is therefore supported through regional and national planning</p>	<p>Sites with extant planning permission were not included in the Sites Schedule, including where the permission has not been implemented. This site is reflected in the Housing Trajectory. Meeting Barnet's housing needs is addressed in Chapter 4 Growth and Spatial Strategy.</p>
			No

		<p>policies. Whilst the Council's aspirations for growth are supported in principle, as set out above, it is important that further optimisation is explored and that the policies relating to the Growth Area clearly express that the housing targets are a minimum, such that additional housing delivery is encouraged so as to exceed the stated targets where high design quality is demonstrated. Optimising residential density within town centre locations is also encouraged under draft Local Plan Policy GSS08. This approach is supported in line with draft NLP and NPPF policies. Parking In locations with a PTAL of 6a, such as the subject site, the draft Local Plan requires development to be car free. This approach is supported in order to promote use of sustainable transport infrastructure and to optimise the potential of sites within highly accessible areas. Tall Buildings The draft Local Plan identifies that the Edgware Growth Area will be an appropriate location for tall buildings. This approach is supported so to make best use of land in a sustainable location. Summary The draft Local Plan aims to deliver significant residential growth in Edgware. The principle of this growth is supported, alongside the aspirations to deliver an enhanced town centre offer with improved connectivity, public space, food, drink and leisure amenities. Given the excellent opportunity presented by the sustainable location of Edgware, with its excellent public transport connections and access to local jobs, services and amenities, it is very important that the development potential of sites, such as Rectory Lane, are optimised to the fullest potential so as to contribute to meeting the borough's housing needs. The draft Local Plan sets a minimum housing target which is some 25% below housing need (as calculated using the Governments Standard Methodology). The Council should therefore explore further growth potential in order to optimise sustainable locations such as Edgware. Should the Council proceed with lower housing targets that are not in conformity with the housing need figures derived from the Standard Methodology, the policy wording should expressly support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality. Policies for tall buildings and car free development are also supported within Edgware. The extant planning permission for the Rectory Lane Site demonstrates that the site is suitable for residential intensification. The site can deliver residential intensification of an under-utilised brownfield site located in a sustainable location. Development on the site is yet to occur; therefore, the site should be allocated to ensure that there is a positive planning framework for bringing forward redevelopment. The site would contribute towards achieving sustainable development, a key requirement of the NPPF (Para 7) and would help the borough to meet its housing needs. It should therefore be allocated within the new Local Plan.</p>		
Dr P. M. Ashbridge	Unallocated Land	<p>Nos.778-860 High Road. (Site number not yet found.) The heritage "Shop-Tops" (first/second floors) run almost continuously on the east side of the High Road from the north corner of Friern Park to Ravensdale Avenue. Near the top of Ravensdale Avenue itself is the heritage building of North Finchley Library. Other heritage frontages include Barclays Bank (810), NatWest (786), and two striking and decorative tall red brick "tops" at 778 and 790 (both locally listed). Planning caution will need to be exercised in relation to the four low-level frontages of NatWest, Waterstones, Boots, River Island, framed by 778 and 790. Any additions to or behind these four of more than two storeys would reduce the impressive heritage context and framing provided by 778/790.</p>	As proposals come forward in North Finchley it will be important to carefully consider the historic character of the High Road	No
Dr P. M. Ashbridge	Unallocated Land	<p>West side, High Road (Site numbers not yet found.) An example of the many Victorian/Edwardian first/second floors of shops ("Shop-Tops") on the west side of the High Road is shown in the adopted SPD, page 42, captioned: "Image 34. Buildings contributing to local character". This almost unbroken run of surviving evidence of North Finchley's historic townscape, in several terraced groups of seven, five, five, three, etc., extends from Hall Street towards Lodge Lane, with decorative keystones and window features, Victorian dormers, etc. - but terminating at the lengthy and over-dominant modern YVA frontage. Historic England's recommendation for "careful consideration of the Victorian and Edwardian buildings lining the High Road" is very relevant here.</p>	As proposals come forward in North Finchley it will be important to carefully consider the historic character of the High Road	No

Mays Lane Gospel Hall Trust	Unallocated land	That LB Barnet should consider greater Green Belt release more generally to deliver housing given their great housing need, historic under delivery and over-reliance on a number of sites that are unlikely to be brought forward in the early stages of the Plan period. Other sites including the wider Mays Lane site identified above are available to be delivered within the first five years of the Local Plan period.	Barnet has the capacity to deliver a minimum of 35,460 new homes from 2021 to 2036. This is expressed in Policy GSS01 and subsequent policies GSS02-GSS12 demonstrate how we will deliver this. The Council has conducted a Green Belt and MOL Review which demonstrates no justification for making significant revisions to existing Green Belt and MOL boundaries.	No
Casa Bella Developments (Savills)	Unallocated Land	<p>The site represents under-utilised brownfield land which currently comprises a large two-three storey commercial building with a basement and is used as a car sales garage with car repair and servicing facilities. Large areas of hardstanding exist at the front and rear of the site which are used for the display of cars as well as for staff and visitor car parking. Cars are also parked on the roof of the building. The site is located within 100m from Colindale / The Hyde District Town Centre along the A5 which has undergone and is undergoing significant changes along its length. An indicative site location plan is provided below. The site is suitable for residential intensification and it should therefore be allocated in the Local Plan. The circa. 0.49 hectare site is located approximately 1.3km from Colindale Underground Station (16 minute walk) providing Northern Line services into Central London, and within walking distance of 6 bus routes (nos.183, 83, 32, 142, 324 and 204). Hendon Station is located 1.4km to the south of the site (17 minute walk) providing Thameslink rail services into central London and north to Luton. The Site has a Public Transport Accessibility Level (PTAL) of 2, with part of the site having a rating of 3 The Site is located within 100m of Colindale The Hyde District town centre providing convenience shopping. A Sainsbury's Supermarket is located 500m to the south and Morrison's, Asda, Marks and Spencer and Aldi are located 1km to the north, all within walking distance. The Site is not located in a Conservation Area and is neither statutory nor locally listed. There are no statutory or locally buildings within close proximity. The site is located in Flood Zone 1 at low risk of flooding. The Council's Proposals Map identifies the site within an Area of Archaeological Importance. This part of the Edgware Road is characterised by a mix of large commercial uses as well as more recent mixed-use developments. The character is varied. These include: Car showrooms to the north and west, The Hyde House Premier Inn, a 12-storey hotel and office building; and Ashton Lodge care home, a 6-7 storey care home. The Edgware Road is being intensified and transformed. This is clear from the various developments completed, underway and approved to the south and north along the Edgware Road, including (inter alia):</p> <ul style="list-style-type: none"> □ The Rushgroves (Former Homebase), east Edgware Road – Planning permission for up to 386 residential homes, 936sqm of B1 floorspace, 97 sqm of A3 floorspace, 295 sqm of Class D1 floor space and 96sqm of Class D2 floorspace up to 14 storeys, approved 21st October 2015 (LB Barnet reference:H/05828/14); □ Colindale Telephone Exchange – Mixed use application comprising up to 505 residential homes and 742 sqm of commercial floorspace in buildings up to 17 storeys, approved on 10th January 2020 (LB Barnet reference: 18/0352/FUL); □ Silk Park, Hyde Estate Road – Resolution to grant planning permission for 1,309 residential homes, replacement 8,998 sqm Sainsburys store and 951 sqm of commercial floorspace in buildings ranging from 4 to 28 storeys, subject to completion of s106 agreement (LB Barnet reference: 19/4661/FUL); □ Zenith House, Edgware Road – Redevelopment to provide 309 residential units, 1611 sqm of B1/D1 floorspace and 97sqm of A class floorspace in buildings ranging from 2 to 16 storeys, application approved March 2011 (LB Barnet reference: /04167/10); and □ Park Parade Mansion – Redevelopment of site involving the demolition of buildings and the erection of 18 storey building containing 920 sqm of retail use, 164 of office use and 110 residential units, resolution to grant planning permission in November 2019 (LB Brent: 17/2284). Site Allocation <p>The Local Plan should specifically allocate this site in order to provide support for the</p>	The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. The sites have been assessed thoroughly as suitable for development. This does not preclude this site coming forward in line with the policy framework outlined in this Plan, in particular GSS06 and GSS11.	No

redevelopment and intensification of the under-utilised site. This site is appropriate for redevelopment given the pressure and need for housing in the borough, and in London. The allocation would provide an appropriate and positive planning context for future applications. The site has potential to deliver a significant number of residential dwellings on a brownfield site in a sustainable location. The NPPF promotes the effective use of such underutilised brownfield sites to deliver homes. For this reason an allocation for residential intensification should be provided in the Local Plan. Policy H1 of the Intent to Publish London Plan encourages such allocations in preparing delivery-focused Development Plans.

Residential Intensification The draft Local Plan seeks to deliver between 2021 and 2036 a minimum of 46,000 new homes (3,060 per annum). The Council has set this target following the preparation of a Strategic Housing Market Assessment. This target is well below housing need when calculated using the Governments Standard Methodology (applying this methodology the Council is required to deliver 4,126 new homes per annum). Taking account of this significant shortfall, it is important that residential intensification of sustainable locations such as the subject site is supported within a positive planning framework. Furthermore, should the Council maintain a minimum housing target which is not in conformity with the Government's Standard Methodology, the policies of the draft Local Plan should be worded to support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality. Taking account of this unmet need, it is important that residential intensification of suitable locations such as the subject site are supported within a positive planning framework. The draft Local Plan identifies that growth will be concentrated in the most sustainable locations with good public transport connections. The Draft Plan states that this includes 6,100 homes in District Centres and 4,900 homes along Major Thoroughfares. The Edgware Road on which the site is located is identified as a Major Thoroughfare within the draft Local Plan, therefore, a location where growth is proposed to be concentrated. As identified above the site also has good public transport connections and is only 100m from the Colindale District Centre where significant additional growth is proposed. Such growth is supported in the Intend to Publish London Plan where enabling development of brownfield sites on the edge of town centres are promoted under Policy GG2. The Intend to Publish London Plan also promotes making the best use of land by optimising residential growth potential, with priority outlined for well-connected sites. This demonstrates that residential intensification of the subject site is supported within the emerging London Plan and provides further justification for allocation of the site.

Employment The draft policies on assessing alternative uses on non-designated employment sites within Policy ECY01 of the draft Local Plan are unclear, and not justified. There should be no requirement for premises to be vacant for over 12 months, because marketing can be carried out whilst a premises are occupied. The requirement for a period of vacancy should therefore be deleted. In accordance with the NPPF, policies need to reflect changes in the demand for land in the context of making effective use of land in meeting the need for homes and other uses; therefore, requiring vacancy would not be a reasonable approach. **Parking** In locations with lower PTAL ratings, such as the subject site, the draft Local Plan requires development to provide car parking. The site is located within close proximity of bus, rail and underground links. The site is also located within 100m of a District Centre and within walking distance of other retail stores. These provide access to a range of shops, services and employment opportunities for potential future occupants of the site. The draft approach stated within the draft Local Plan of using the PTAL rating to establish maximum parking standards is not always suitable. It is suggested that further criteria are included within Policy TRC03 so that account can be taken of access to shopping facilities, amenities and employment opportunities in determining appropriate levels of parking for individual sites. Other criteria that should be considered should include: the type, mix and use of development. This approach would be in accordance with the NPPF which states that if setting local parking standards, policies should take account of these criteria.

Tall Buildings The draft Local Plan identifies that development along a Major

		<p>Thoroughfare, such as the A5 Edgware Road, will be an appropriate location for tall buildings. This approach is supported so to make best use of land in a sustainable location. As identified above the Edgware Road has been subject to a significant amount of development in recent years with development rising up to 28 storeys in height. These applications demonstrate that the Edgware Road is a suitable location for tall buildings, where tall buildings are characteristic of the townscape of Edgware Road. Summary The draft Local Plan aims to deliver significant residential growth within Colindale, around District Centres and along the Edgware Road which is identified as a Major Thoroughfare. The principle of this growth is supported. Given the excellent opportunity presented by the sustainable location of Colindale, with its good public transport connections and access to local jobs, services and amenities, it is very important that the development potential of sites, such as The Hyde, are optimised to the fullest potential to contribute to meeting the borough's housing needs. The draft Local Plan sets a minimum housing target which is some 25% below housing need (as calculated using the Government's Standard Methodology). The Council should therefore explore further growth potential in order to optimise sustainable locations such as Colindale. Should the Council proceed with lower housing targets that are not in conformity with the housing need figures derived from the Standard Methodology, the policy wording should expressly support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality. The draft Local Plan policy on alternative uses on non-designated employment sites should be amended to remove the requirement for vacancy as this would not be a reasonable approach, in the context of the need to make effective use of sites. Parking policies within the draft Plan do not allow sufficient flexibility to allow for the best use of development sites, given its focus on PTAL ratings. Other criteria should be taken into account and reflected in planning policy in accordance with the NPPF. The site can deliver residential intensification of an under-utilised brownfield site located in a sustainable location. The site should be allocated to ensure that there is a positive planning framework for bringing forward redevelopment. The site would contribute towards achieving sustainable development, a key requirement of the NPPF (Paragraph 7) and would help the borough to meet its housing needs. There is therefore strong justification for the allocation of the site within the new Local Plan.</p>		
Dalton Warner Davis LLP	Unallocated Land	<p>On behalf of Aberdeen Standard Investments PLC DWD supports allocation of the Car Showroom Site (approx 0.79Ha with 4,500 sqm (GIA) of car showroom space) for a residential-led development. In line with the NPPF the Site is considered both deliverable and developable and using the NPPG it can be demonstrated that a residential-led development at the Site is suitable and achievable, with the Site also being available. The Site is located along a designated Major Thoroughfare which is considered a growth corridor suitable for higher density residential development which would contribute to the Borough's ascribed private and affordable housing targets, whilst improving public realm and connectivity between sites along the Edgware Road major thoroughfare and nearby transport connections. The Site is also located adjacent to the Silk Stream, which is part of a green corridor extending to Brent Reservoir. This also offers the opportunity to contribute to Borough's aspirations of providing biodiversity enhancements to the Silk Stream to the benefit of the locality. It is recognised that the Site is designated as part of a LSIS which safeguards industrial land in the Borough, but upon further review of the existing use of the Site, the context of the Site, and the evidence and recommendations of Barnet's Employment Land Review, it is considered that this constraint to allocation can be overcome. The Site is grouped with the Garrick Industrial Centre, as a designated Locally Significant Industrial Site ("LSIS"), however the site is currently not used for industrial purposes and sits outside the remainder of the Industrial Estate accessed from Irving Way. The Site is also adjacent to existing residential dwellings to the south on Garrick Road and approved residential uses to the north on the Sainsburys Site at Hyde Estate Road. The Site is also located adjacent to an industrial estate known as the Garrick Road Industrial Estate ("Garrick Estate"). The Site is currently occupied by</p>	<p>Garrick Industrial Centre is designated employment land (LSIS) in the Local Plan. Site 21 in Barnet's ELR clearly identifies Garrick Industrial Centre a small stand-alone office, light industrial and retail site behind the A5 consisting of 24 two-storey units, some with loading bays and reception areas. The ELR advises that this site should be retained for employment use. Given the LSIS designation the Council will expect any proposal to be innovative and respond positively to the safeguarding rather than the simplistic solution of changing the boundaries of the LSIS.</p>	No

		<p>a single-storey car showroom with car servicing and repair located to the rear. The existing building on the Site does not address the Edgware Road frontage and is set back to accommodate a forecourt. Part of the forecourt area of the Site is located within a Flood Risk Zone 2 which will require a flood risk assessment and mitigation strategy to be provided with any future application. An area of Flood Risk Zone 3 is also located adjacent to the Site. The most simplistic action which could be taken to overcome the identified policy constraint, would be to release the Site from its designation as an LSIS. This would involve an amendment to the LSIS boundary to retain the existing employment land on the Garrick Estate, whilst releasing the Site. Promotion of the Site by the Client for a residential-led development is an indicator as to the availability of the Site as per the NPPG, whilst development of the type proposed is considered achievable as demonstrated by the Client's active interest in the site and the emerging precedent around the Site. Therefore in line with Regulation 18 (3) of the Town and Country Planning (Local Planning) (England) Regulations 2012 Act 1990, the Council is respectfully requested to consider the recommendations of this Consultation Rep to include Car Showroom, The Hyde, Edgware Road, London, NW9 6BH as an allocated site for a residential-led development in the Draft Local Plan Appendix 1 'Schedule of Site Proposals', whilst amending the boundary of the Garrick Estate LSIS designation to omit the Site. We would be grateful for an opportunity to discuss these matters further with the Planning Policy Team.</p>		
Fairview Estates	Unallocated Land	<p>Victoria Quarter and Hartland Drive. We object that neither site has been included within the "Schedule of Site Proposals" despite both sites being considered suitable for residential development and with relative recent approvals for residential development. The exclusion of both sites means the Plan has not positively prepared and is therefore unsound. Victoria Quarter located at the former British Gas Works, Albert Road. The site is 3.034ha and comprised the former Gas Works and a number of former commercial / residential properties which fronted onto Victoria Road. The majority of structures and hard surfacing on the site has been removed with decontamination and the basement car park dug out in accordance with Planning Permission ref: B/04834/14. The site's context is varied with a range of two and occasionally three storey semi and terrace houses located to the south east. Victoria Park is located immediately to the east of the site. To the north of the site is the Albert Road Gas Works with two storey terrace housing beyond. The Railway Embankment runs along the western boundary of the site. The site benefits from recent Planning Applications/ Permissions: Planning Permission Ref B/04834/14; Ref 16/7601/FUL; Ref 17/5522/FUL. In summary, the site has approval/approval pending S106 agreement for 371 new units/houses across the site as well as 618sqm of commercial space. Following a review of these applications and the updates to National and Regional Policy since the applications were submitted, Fairview and our JV Partners One Housing Group considers that current/pending permissions do not make the most effective use of the site and the site has capacity for additional dwellings given its location on the edge of the Town Centre and close to the railway. We consider that the site has capacity to provide c.660 residential units with 423 sqm commercial space. This would provide c.289 additional units for the Borough and ensure the site developed to its optimal capacity. This has been discussed with Officers during the pre-application process and is generally supported. We therefore contend that the Victoria Quarter should be allocated within the emerging plans for an increased number of units than currently permitted/proposed to ensure that the Council optimises its capacity. The site current exclusion from emerging plan demonstrates that the Local Plan has not been positively prepared and is unsound. Hartland Drive located to the north of Edgware and is c.1.7ha. The site is currently vacant and is located to the north of Hartland Drive and to the south of Broadfields Primary School. The site has been purchased by Fairview New Homes with the intention to commence development immediately upon a satisfactory planning permission. The site was previous an Infant School but was vacated with all structures demolished following the construction of Broadfields Primary School. There are a</p>	<p>The Council has conducted an extensive 'call for sites' process and it is unfortunate that Fairview have not participated in this information gathering exercise to support Barnet's Local Plan. The absence of these 2 sites from the Schedule of Proposals does not make the Local Plan unsound. The principle of development has been established at Victoria Quarter. Similarly at Hartland Drive the principle of development has been established with the recent planning permission in 2016.</p>	No

		number of relevant Planning Permission for the site: Planning Permission Ref: H/04494/08 and Ref 15/0337/FUL granted in 2016 for 112 residential units comprising 52 houses and 60 flats. As demonstrated by the sites planning history, the Hartland Drive is brownfield site which has been previously considered suitable for residential development. We contend that this still the case and the site could accommodate c.130 units. The site should be included within the Schedule of Site Proposals and its current absence demonstrates that the Council are not considering all suitable housing sites to meet their objectively defined need. The Council has therefore failed to plan positively and the plan is unsound.		
TfL (CD)	Unallocated Land	consider that Golders Green transport hub should have a site allocation. TfL CD considers this site to have capacity for significant mixed-use redevelopment in the future and, given its highly sustainable location, think it is important that the Town Centre Strategy fully recognises the scope for residential uses to come forward as part of this	The Council has previously considered this location, but found it to be unsuitable for residential development due to severe impacts on heritage and local amenity.	No
Roger Chapman	Unallocated Land	Add new para 4.25 Barnet Wastelands - 4.25.1 The Barnet Wastelands are centred on Bishops Avenue in the east of the Borough adjacent to the Haringey and Camden Borough boundaries. The area comprises several poorly designed mansions many of which are in a derelict and abandoned state. High levels of empty properties are recognised as having a serious impact on the viability of communities. Consequently, it has been identified that dealing with empty properties can have social, regenerative, financial and strategic benefits. ¹ The area is ripe for regeneration and should be redeveloped for social housing. Comprising some 26 ha of land a considerable contribution could be made to providing key worker housing for nurses, firefighters and police and other similar occupations. Improved bus services would be required particularly to connect to East Finchley Underground station and to local hospitals such as the Royal Free and Whittington and Highgate Mental Health Centre.	The Council recognises that there is a problem with derelict and abandoned properties around Bishops Avenue and would like to see a more efficient use of land that is consistent with the Local Plan policy framework and the Hampstead Garden Suburb Conservation Area.	No
Taylor Wimpey Strategic Land	Unallocated Land	TW has an interest in land to the east of Colney Hatch Lane to deliver residential development. It is considered that this site should be removed from Metropolitan Open Land (MOL) and allocated for housing as the site does not meet any objectives of MOL and is a sustainable location for housing which would assist in meeting LBB's housing requirement. The site is located to the south of the A406 and to the east of Colney Hatch Lane at the edge of Muswell Hill. Residential development adjoins the site to the east, south and south-west, with the Powerleague sports facilities and the A406 road to the north. Access to the site is currently provided from Fairfax Way, via Cromwell Road to the south of the site. The site has been vacant since 2004, having previously been in use as an Inner London Education Authority (ILEA) playing field and is approximately 1.77ha. The former pavilion on the site has been demolished. The site is currently designated as Metropolitan Open Land (MOL) in the adopted Local Plan. The site is located wholly within Flood Zone 1 but is not subject to any other designations.	The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. An assessment of Green Belt and MOL has supported this Plan and there are no merits for releasing this site from MOL designation.	No
Land owner at 360-366 Burnt Oak Broadway, (Avison Young)	Unallocated Land	It is our view that land at 360-366 Burnt Oak Broadway, Edgware HA8 5AN (refer to site plan at Appendix A) should be added to the Schedule of Site Proposals and allocated for housing development (potentially alongside small scale complementary commercial uses), in line with the following details: Site: Robins & Day Peugeot Garage Address: 360-366 Burnt Oak Broadway, Edgware, HA8 5AN Site Size: 0.71 ha, PTAL: 3 to 5, Ward: Burnt Oak, Existing Use: Sui Generis, Proposed Use: Residential, Location type: Urban, Privately owned under single ownership, Indicative Residential Capacity: 150 homes, Development Timeframe: 5-10 years. The site was not proposed to the Council as part of the Call For Sites consultation although should representations have been made, the site would have met the Council's assessment criteria for allocating sites on the grounds of being Suitable, Available and Achievable, as demonstrated below: Suitability - The site is previously developed and located in a highly accessible location on the edge of Edgware Town Centre and with a PTAL rating of 3-5. Planning policies at all levels support the reuse of such sites in principle, particularly for housing. Furthermore,	The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. The sites have been assessed thoroughly as suitable for development. This does not preclude this site coming forward in line with the policy framework outlined in this Plan.	No

¹ Empty Housing (England) By Wendy Wilson, Hannah Cromarty, Cassie Barton House of Commons Library Briefing paper Number 3012, 29 May 2019

		<p>the site is located on the edge of the Edgware Growth Area designation and within the Edgware Road/A5 Major Thoroughfare designation, therefore allocating the site for development would be firmly in line with the spatial policies of the new plan. The site accommodates large 'shed' style structures (which make an inefficient use of the site), alongside associated hardstanding. It is not located in a Conservation Area nor does it contain any listed buildings, therefore the demolition of the existing buildings is acceptable in principle in planning terms. The site is currently in use as a car dealership, which includes extensive associated surface car parking and the outdoor display of vehicles for sale. There are no planning policies that protect this existing use. Indeed, draft London Plan Policy H1 specifically supports the principle of redeveloping 'car parks and low-density retail parks' for housing. The site benefits from existing vehicular access provision from Edgware Road which can be re-used. It is suitable in technical and environmental terms. It is predominantly in Flood Zone 2 with Flood Zone 3 to the north. A culverted river runs along the northern boundary of the site. It has no recent history of flooding. The site is suitable for a range of uses (including residential) in flood policy terms. It is not subject to any protective environmental designations Heritage constraints are minimal. The nearest heritage assets are 70m to the south and 170m northwest of the site (both Grade II Listed Buildings), and the surrounding townscape context is not sensitive. Accordingly, we consider the site to be suitable for tall buildings (in line with draft Local Plan Policy CDH04). In summary, the site is considered Suitable for redevelopment. Availability - The site is privately owned and under single ownership. It is currently occupied under the terms of a lease but is likely to become available for redevelopment within 5-10 years. The landowner is actively seeking to redevelop the site. Achievability - Consultation with land agents confirms that there is demand for residential development land in this location and that the site presents a realistic and viable opportunity for development which would be attractive to a range of residential developers. We have demonstrated that the site at 360-366 Burnt Oak Broadway is Suitable, Available and Achievable for residential development and therefore propose that it is allocated for housing and included in Annex 1 – Schedule of Site Proposals.</p>		
Mill Hill Missionaries	Unallocated Land	That both sites, given their poor Green Belt performance, are released from the Green Belt and considered for future development.	The Green Belt and MOL Review demonstrates no justification for releasing land designated as such or making significant revisions to existing Green Belt and MOL boundaries.	No
Middlesex University (Tibbalds Planning)	Unallocated Land	Land occupied by Nos 1-3 The Burroughs which is owned by the University and lies directly to the south, should be added to the Ravensfield site proposal. This land has clear redevelopment potential to provide additional student accommodation, as identified in the work being undertaken on the emerging Middlesex University and The Burroughs SPD, and therefore this should be recognised in the draft Local Plan.	The Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. This does not preclude this additional site coming forward for redevelopment in line with the policy framework outlined in this Plan. .	No
Middlesex University (Tibbalds Planning)	Unallocated Land	In addition, the University requests consideration that the Council-owned land located directly to the north and west of the car park site (fronting onto Greyhound Hill) be added to the site proposal as a potential location for future educational space as part of the expansion of facilities at the Hendon Campus.	The site in question belongs to the neighbouring school and is considered to have value as future area for biodiversity and form part of a green corridor that can be traced back to the A41.	No
Whetstone Properties Ltd (Simply Planning)	Unallocated Land	As such, we would request that the site is reconsidered once again, once the Council has revised its approach to the preparation of the plan, to ensure soundness in relation to its assessment of the minimum housing need via the Standard Methodology. Once completed, we consider this will lead to the inescapable conclusion that a full stage 2 Green Belt review will be required and detailed consideration given to whether Green Belt land can be released under the exceptional circumstances outlined in Paragraph 136 & 137 of the NPPF.	. Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek	No

			to revisit their local housing need figure when preparing new strategic or non-strategic policies. The next version of the London Plan is expected to respond to the need for a strategic review of the Green Belt / MOL.	
Highways England	Evidence Base Strategic Transport Assessment	Highways England note a Strategic Transport Assessment has not been prepared as part of the Draft Local Plan, setting out the likely impacts of the Borough's preferred growth option on the wider transport networks and the requirements for new transport infrastructure/services over the lifetime of the Local Plan. This is in addition to transport evidence and modelling to be undertaken to determine what the impact of development could be on the strategic highway network and therefore what measures may be required to mitigate these impacts. It is therefore unclear at this stage whether it will be possible to sufficiently mitigate the impact of the allocated development locations or whether the impact will be too great to feasibly ensure that the network operates within capacity at the end of the plan period. Until this Strategic Transport Assessment has been submitted, Highways England are not in a position to offer any detailed comments at this point in time. We advise that a Strategic Transport Assessment is sent to Highways England for consultation as soon as possible. The Strategic Transport Assessment should be in accordance with Circular 02/2013. We require suitable measures to be considered and evidenced in the Local Plan to manage demand of future traffic levels and growth. The increasing demand for development and other infrastructure will likely result in wider impacts, which when combined with the provision in your Local Plan for improved transport links, may have a longer term impact on the M1 corridor in particular, which would be of interest to Highways England. Highways England expect the promoters of development to put forward initiatives that manage down the traffic impact of proposals to support the promotion of sustainable transport and the development of accessible sites. The transport related evidence base needs to be sufficiently appropriate, up-to-date, transparent and robust, such that it can be deemed sound. The evidence base should cover an appropriate area; for transport this may be beyond the borough boundary. The evidence base should also ensure that it assesses the individual and cumulative impacts of developments within the study area over the whole plan period and, as necessary, at various intermediate dates to identify any tipping points when action will be required. We welcome this opportunity to respond to Barnet's Draft Local Plan Regulation 18 Consultation and would like to request a meeting in order to discuss our response to the consultation and the way forward in terms of Highways England's response.	A Strategic Transport Assessment has been produced as part of the Local Plan evidence base and has informed the Reg 19 version.	Yes
Glenroy Estates	Evidence Base Alston Works	Policy E6 of the Intend to Publish London Plan (December 2019) requires boroughs to define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS), justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution. The supporting text notes that designations should be based on evidence in strategic and local demand assessments. LB Barnet released their most up to date Employment Land Review in October 2017. Alston Works was assessed, and it was noted that the site "is very congested, in a mainly residential area. On-site parking is extremely congested, making deliveries difficult and possibly adding to local congestions". The assessment concludes smaller units should be promoted on site as these are considered viable in the longer term. The site used to be a large-scale employment site designated as an LSIS, but it was released from this designation in 2012 due to its limited potential for employment redevelopment after it was assessed in LB Barnet's previous Employment Land Review (2009). This document assessed the Alston Works estate and rated the site 'Red', taking into account various indicators such as age, building quality, parking provision, accessibility etc. The assessment recommended the release of the industrial designation for the following reasons: <ul style="list-style-type: none"> • The site is almost entirely enclosed by residential buildings with a small entrance point onto Falkland Road; 	The Council is guided by the 2017 ELR, and its recommendations which supported the introduction of an Article 4 Direction to safeguard what were previously B1a and B1c uses. There is flexibility within a LSIS designation for safeguarding creative industries as at Alston Works.	No

		<ul style="list-style-type: none"> • It has limited accessibility and poor parking provision; • The site scores poorly in terms of fitness for purpose and marketability and is unlikely to appeal to any B8 type occupier; and • It has very limited redevelopment potential. <p>Of the 24 industrial estates assessed in Barnet in 2009, only 3 were rated 'Red' including Alston Works. It is not clear from the LB Barnet 2017 Employment Land Review how it has been determined that Alston Works is now suitable again to accommodate LSIS uses, nor what circumstances have changed to warrant a stricter employment designation. The 2017 assessment appears limited, with no reference to future suitability of the site or the quality of the buildings currently in use. NPPF paragraph 31 requires the preparation and review of all policies to be underpinned by relevant and up-to-date evidence, which is adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. In line with this paragraph, the text of Policy E6 of the Draft London Plan requires Employment Land Reviews to inform the definition of new LSISs. There is no evidence put forward within the 2017 Employment Land Review to explain why an LSIS should be established in this location, and the "scope for intensification" (as required by Policy E6) has not been examined at all. Paragraph 35 of the NPPF concerns the examination of new Local Plans and whether they are 'sound', with part b) requiring the preparation of a Local Plan be Justified; meaning it delivers an appropriate strategy, takes into account the reasonable alternatives, and is based on proportionate evidence. The LB Barnet Employment Land Review (2017) fails to shed new light on the appropriateness of the site compared to the 2009 review and seems to concur with the findings of the original document (which recommended the removal of the LSIS designation). It is also worth noting that the site has planning permission (application ref. B/02621/13) for the continued use of the existing buildings as 30 live/work units. The planning use class of live/work units does not conform with the requirements of an LSIS designation and its introduction would be counter-productive to the existing community. The site make-up has evolved over time in tandem with an economy which has shifted away from traditional industrial uses in this area and now the industrial buildings are being used for more creative, less intensive employment generating uses (which are considered more suitable for this area with regard to the amenity of neighbouring occupiers). If an LSIS was introduced, the existing community would be unable to grow organically and unable to adapt to a changing economic environment, as planning applications would be refused when assessed against the new designation. The LB Barnet Employment Land Review 2017 projects an increase in the professional scientific and technical services sector by 36% from 2016-36, with information and communication services, administrative and support services, education, and health, all projected to increase by more than 100,000 jobs over this period. Therefore, the conclusion that Alston Works must be re-designated as an LSIS is not based on any proportionate evidence nor understanding of the current lawful uses on site, and is therefore in direct conflict with paragraphs 31 and 35 of the NPPF, and it does not take into account other factors such as the scope for intensification, in conflict with Policy E6 of the Draft London Plan. For these reasons our client considers that an LSIS designation would not be justified as it is not based on a sound evidential assessment of the existing land use/site schedule of accommodation and would restrict economic development on site.</p>		
London Diocesan Fund (Iceni Projects)	Evidence Base Green Belt Study	The Council appointed LUC to produce a Stage 1 Green Belt assessment to inform the preparation of the Local Plan. The site was assessed as having a strong contribution to 4 purposes of the Green Belt and a relatively weak contribution to purpose 2. As a starting point we do not consider the Stage 1 Green Belt Assessment to be an appropriate basis for determining which sites to remove from the Green Belt, thus the ability for sites to be assessed properly has been missed due to the absence of a more refined assessment of individual parcels. The recent Sevenoaks Local Plan was declared unsound and within the Inspector's Report was significant criticism of a similar approach. We have	Barnet has a housing target of 35,460 new homes and can demonstrate through this Local Plan a deliverable supply against this target. This helps to protect valuable Green Belt land from development	No

included our assessment of the site to demonstrate that the site does not fundamentally contribute to the five aims of the Green Belt as outlined within Para134 of NPPF. We consider that both housing and educational needs demonstrate exceptional circumstances sufficient to justify Green Belt release. We urge the Council to follow the examples of Enfield and Hounslow in exploring the potential of the Green Belt to meet housing requirements. Given the conclusions we consider that the site should be considered for release from the Green Belt in order to meet the overwhelming housing and sport and recreational needs in the Borough.

Purpose	LUC's Assessment	Our Assessment
Purpose 1 Assessment – to check the unrestricted sprawl of large built up areas	Strong	The site is boarded to the south and east by Mount House School and residential development situated in the Green Belt.
Purpose 2 – To prevent neighbouring towns from merging into one another	Relatively weak	The site forms part of an existing built up development and does not extend in to open countryside. Development of this site would extend to the north, therefore not contributing to the merging of neighbouring towns.
Purpose 3 - To assist in safeguarding the countryside from encroachment	Strong	The site contains an area of mature trees to the south west with Mount House School situated on the southern boundary of the site, enclosing the southern area of the site within the existing urban form.
Purpose 4 – to preserve the setting and special character of historic towns	Strong	The site is located in a Conservation Area, however any proposals for the site will respect and enhance the existing settling of the surrounding area.
Purpose 5 - to assist in urban regeneration by encouraging the recycling of derelict or other urban land	Strong	Development would not preclude the recycling of derelict and other urban land elsewhere in Barnet.

Historic England	Evidence Base	We are pleased to see that Barnet has a local list that is regularly reviewed. We note however that the local list makes little reference to landscapes, archaeology or historic associations. Landscape/archaeological components of the historic environment are particularly relevant to large parts of Barnet, given the borough's location on the edge of London with more green spaces, including large areas of Green Belt that may have much older traces of human activity than surviving elements of the built environment.	Due to the scale and complexity of revising the local heritage list it was decided to limit the range of potential entries to buildings and other structures and not include landscapes or archaeology.	No
Historic England	Evidence Base	focuses primarily on existing and permitted schemes and provides little guidance on how future tall buildings should be managed. The study says that the borough Characterisation Study should be the starting point when considering potential impacts. We encourage the Council to make use of this study at plan-making stage to provide more detail on potential height ranges in the site specific policies in Annex 1; this will help establish a properly plan-led approach to their management. The Council has a range of	Annex 1 highlights relevant policies for each site proposal including Policy CDH04 enabling cross-reference to strategic locations for tall and very tall buildings and their height ranges.	Yes

		existing evidence documents which could be drawn together to provide an explicit borough wide approach to provide clearer policy recommendations and support growth areas. The Tall Buildings Update places an emphasis on the creation of landmarks buildings to provide legibility but it is important to note that not all tall buildings can be a landmark and so it is questionable how helpful this is as policy criteria for decision makers.		
Pinkham Way Alliance	Evidence Base	Lack of significant evidence in the SFRA renders the Plan unsound	SFRA Stage 2 has been produced and has informed the Reg 19 document	Yes
Sport England	Evidence Base	Sport England does not consider the draft Plan as sound and consider that specific policies relating to indoor and outdoor sport facilities, including playing fields, should be included within the draft Local Plan, based on a robust and up-to-date evidence base, such as the emerging Playing Pitch Strategy Refresh and Indoor Sport and Recreation Facility Study. Although aware the Council are preparing the Playing Pitch Strategy, current policy is based on out of date information.	The Council's update to the Playing Pitch Strategy is underway. The Indoor Sport and Recreation Facility Study was completed in 2018 and is therefore not considered out of date.	No
Highways England	Evidence Base IDP	Highways England acknowledge and welcome that an Infrastructure Delivery Plan (IDP) will be prepared to accompany the Local Plan, setting out the infrastructure required to support the delivery of growth within the Borough. We would request that we are included in any subsequent consultation on the IDP, as there may be potential impacts on the SRN.	The IDP has been published as part of the Local Plan evidence base	Yes
Brent Cross South Partnership	Evidence Base	Although Figures 1 and 2 in the Draft Local Plan are useful, further clarification is sought as to how separate strategy documents published by the Council (e.g. the Barnet Housing Strategy (March 2019), the Draft Transport Strategy (February 2020), the Growth Strategy (2019), Education Strategy and Parks and Open Space Strategy) relate to and inform the Draft Local Plan (particularly where there is on-going consultation, such as with the Draft Transport Strategy).	The Local Plan provides the spatial representation of these corporate strategies.	Yes
Brent Cross South Partnership	Evidence Base	It would be helpful to understand how the Draft Local Plan will inform the CIL Review process, which we note from the Local Development Scheme 2020, is currently underway with a Reg. 22 submission expected in the Spring of this year. It will be particularly important for the CIL Review to look very closely at the viability considerations for the identified Growth Areas, particularly in relation to Brent Cross given the scale of development and infrastructure that is to be delivered in this area. It should also be noted that the strategic infrastructure in these areas does not only benefit the Growth Area(s) but will have wider, more strategic benefits within and beyond the Borough and so should be funded accordingly.	The Plan has been updated to reflect the milestones for the CIL review process. Consultation on the new CIL charging schedule took place earlier this year. .	Yes
Brent Cross South Partnership	Evidence Base	A number of documents forming the technical evidence base as noted in Appendix A of the Draft Local Plan (including the Infrastructure Delivery Plan and the Viability Assessment) will only be provided at the Reg. 19 consultation stage. These documents are important to understanding the effectiveness and deliverability of the Draft Local Plan, especially in relation to the Borough's allocated Growth Areas. Further detailed comments may arise on the relevant aspects of the Draft Local Plan once these documents have been made available.	These documents are now available as part of the Reg 19 evidence base	Yes
LB Enfield	Evidence Base GTNAA	We note that there is no objectively assessed need for pitches and plots for gypsies and travellers and travelling show-people households in Barnet but recognise that the requirement for pitches will be kept under review to ensure that sites remain available. This approach is broadly welcomed, which allows a permissive approach to be taken towards sites that may come forward and which meets its criteria, but we feel that Barnet may also needs to take account of any unmet needs from an adjoining authority.	We have revisited the evidence behind the GTNAA This will be reflected in our Statement of Common Ground with LB Enfield	No
Mayor of London	Map 25	Overall the Mayor supports the additions to the Green Belt and MOL, however, he has strong objections to the removal of the MOL designation where it covers green open space that are still distinguishable from the built-up area and forms part of the open land. Map 25 – the curtilage should remain as MOL as it contributes to the physical structure of London by being clearly distinguishable from the built-up area	Sensible to alter Green Belt and MOL boundaries in order to support the robustness of their designations and their practical application. The Green Belt Study highlighted that there is no practical benefit in the MOL boundary cutting through a building.	No

Mayor of London	Map 26	Map 26 – this area is predominantly green and along with the railway verge contributes to the physical structure of London by being clearly distinguishable from the built-up area	The Green Belt Study recommended this revision to align with the footpath	No
Mayor of London	Map 36	Map 36 - the curtilage should remain as MOL as it contributes to the physical structure of London by being clearly distinguishable from the built-up area	The Green Belt Study recommended a more rational and therefore stronger boundary	No
Mayor of London	Map 37	Green area should remain as MOL as it contributes to the physical structure of London by being clearly distinguishable from the built-up area	The Green Belt Study recommended that this would create a stronger and more defensible boundary	No
LB Harrow	Duty to cooperate	LB Barnet is located to the east of LB Harrow, with the A5 running north – south as the administrative boundary. Located along this are the two town centres of Edgware (Major) and Burnt Oak (District) which overlap the administrative boundary (Burnt Oak is also within the administrative area of LB Brent). LB Harrow has a strong history of good working relationships with LB Barnet, primarily through the West London Alliance. Cross boundary work has also been successfully undertaken and put into practice, specifically through the preparation of joint evidence base documents (i.e. West London Strategic Flood Risk Assessment, West London Strategic Housing Market Assessment), input into other borough specific evidence base documents (i.e. Green Belt review). Furthermore to this, there has been on-going dialogue between the West London Alliance boroughs in relation to planned future strategic infrastructure, specifically with regard to the West London Orbital Link. It is acknowledged that whilst this infrastructure is not planned to be located within LB Harrow, it is nonetheless in such proximity as to have a positive impact on orbital connectivity in West London. The current Strategic Infrastructure Delivery Plan commissioned by the WLA also represents positive joint-working between the boroughs and will assist in identifying infrastructure required to support development in the sub-region where it serves more than one borough. The draft Local Plan (Reg18) document states that Barnet Council will work collaboratively to plan for cross borough boundary matters. Consistent with this the London Borough of Barnet will produce evidence to show how it has complied with the duty to co-operate and produce statements of common ground with neighbouring local planning authorities, which includes LB Harrow, throughout the various stages of the adoption of the Local Plan. LB Harrow looks forward to working with LB Barnet in relation to the statement of common ground, which will provide detail in relation to the matters detailed (but not necessarily limited to) within paragraph 20 of NPPF (2018).	This will be reflected in our Statement of Common Ground with LB Harrow	No
Department of Education	Duty to Cooperate	Add DfE to list of relevant organisations engaged with in preparation of the plan. Notify DfE when the Local Plan is submitted for examination, the Inspector’s report published and the Local Plan adopted.	We welcome this response from the Department of Education and will ensure they are informed of progress on the Local Plan	Yes
Department of Education	Statement of Common Ground	Given significant cross-boundary movement of school pupils between LB Barnet and adjoining Boroughs, and because it is understood that LB Barnet is a net importer of pupils, DfE recommends that Council covers this matter and outcomes of cooperation to address it as part of its Statement of Common Ground.	Agreed that this will form part of Statements of Common Ground with neighbouring boroughs	No
Former MHNF	New Policy	A policy should be brought forward so that all properties are required to be clearly marked (illuminated at night) by their number in each street, not simply by their name, so that visitors and notably delivery drivers can easily locate the premises at all times, and do not spend huge amounts of time (increasing emissions) hunting for the property. Names do not inform someone searching for a property of their position in the street relative to other properties, and this is a significant contributor to noxious emissions.	Whilst acknowledging the merits of reducing carbon emissions this is outside the scope of the planning system.	No
Roger Chapman	New Policy GSS14 Barnet Wastelands	Add new policy - The Council will support the development of the Barnet Wastelands for social housing. The Council will use Compulsory Purchase Orders and other powers to tackle empty homes to acquire and consolidate underused, abandoned and vacant sites which proliferate along Bishops Avenue. The Council will seek: a) a high standard of design featuring good quality open space including linkages to the strategic walking network.	The Council agrees that more efficient use of land is needed in this location and is working to achieve this. It does not consider that a bespoke planning policy is merited. The Local Plan seeks high standards of design and supports sustainable modes of travel.	No

		<p>b) improved active transport links throughout the site to both Hampstead Heath, East Finchley and Highgate.</p> <p>New public transport links to East Finchley Underground station and town centre, the Royal Free and Whittington Hospitals and Highgate Mental Health Centre.</p>		
John Cox	London Plan	<p>To start with a general point, I presume you will give full and detailed consideration to the response of the Secretary of State to the Mayor last Friday, and to the Mayor's eventual reply. Many of his comments were in regard to housing. The Secretary of State, under the Greater London Authority Act 1999 Section 337 has directed that the new London Plan must be changed to increase the availability of land for housing. Amongst all the other text in his letter, I will follow Barnet's responses to the following remarks with interest: "It is important that both Government and you as Mayor are seen to be leaders in supporting ambitious approaches to planning and development; and I am concerned that your Plan actively discourages ambitious boroughs." "I am therefore Directing you to work constructively with ambitious London Boroughs and my Department to encourage and support the delivery of boroughs which strive to deliver more housing." "Your Plan will be to the detriment of family sized dwellings ... needed across London. This is not just in relation to their provision but also their loss, particularly where family sized dwellings are subdivided into flats or redeveloped entirely." "Steps must include: * Supporting ambitious boroughs to go beyond your Plan targets ... * Actively encouraging appropriate density, including optimising new capacity above and around stations."</p>	The Mayor has made changes to the London Plan in response to the Directions from the Secretary of State. Appropriate revisions have been made to Barnet's Local Plan as it needs to be in general conformity with the London Plan.	Yes
Roger Tichborne	Mill Hill	<p>Need more holistic approach for Mill Hill area with various other specific points raised with regard to the station at Mill Hill Broadway - air pollution and wider area regeneration. Stronger recognition of Mill Hill's sport and music potential, protection of green belt at Partingdale Lane and heritage and employment value of Mill Hill School.</p>	While there still remains a prospect for a Neighbourhood Plan at Mill Hill these more local issues are better addressed at that level within the strategic framework provide by Local Plan and London Plan	No
Lucia Carabine	General	<p>I am very concerned that there is massive residential development in the borough and Mill Hill in particular, but no local growth in employment opportunity. The plans for Brent Cross Growth Area boast retail space and assumed employment when retailers are suffering substantially from internet retailer competition. These plans were made 11 years ago when the demand for retail space was higher and I fear they will not contribute substantially to the growing employment needs.</p>	A key objective of the plan is to ensure that housing provision is matched by growth in jobs. The Plan sets safeguards to protect employment uses as well as identify new opportunities for jobs and skills and training.	No
Home Builders Federation	General	<p>We were unable to locate a viability report among the supporting papers. We assume this is because this is still work-in-progress and it depends very much on the outcome of this consultation. This is sensible. As advised by planning guidance, HBF and the development industry would welcome the opportunity to meet with the Council to discuss the assumptions that will inform that appraisal, in an endeavour to secure as much agreement as possible on key factors such as benchmark land values, development costs, profit margins etc. This would help to reduce the number of potential areas of dissent at the examination stage.</p>	A Viability Report has been published as part of the Reg 19 Evidence Base	Yes
CPRE	General	<p>Strong links should be drawn within the Local Plan to the Transport Strategy and related targets to reduce car trips and increase active travel as per the Mayor's Transport Strategy. In particular the Local Plan should reference the need for introduction of borough wide Controlled Parking Zones, borough wide Low Traffic Neighbourhoods and protected cycle track on all main roads and should ensure all new development is car-free or car-lite in particular to cater for older people, younger people and people on low incomes who cannot or do not want to drive. We welcome and support proposals where this approach is already planned</p>	Further evidence published on transport – Strategic Transport Assessment as well as Long Term Transport Strategy. This has informed the Reg 19 version.	Yes
Barnet Cycling Campaign	General	<p>Unfortunate that consultation on LB Barnet's Transport Strategy, which includes proposals relating to transport that should be reflected in planning policies, closed after the Reg 18 stage of its Local Plan. For example, proposals for Low Traffic Neighbourhoods are included in the Transport Strategy, but not in this version of the Local Plan</p>	Further evidence published on transport – Strategic Transport Assessment as well as Long Term Transport Strategy. This has informed the Reg 19 version.	Yes

Dr P. M. Ashbridge	General	<p>Important comments by Historic England on the North Finchley Town Centre SPD consultation need to be taken into account also for amendments to the Barnet Local Plan. For instance:</p> <p>(i) "When referring to 'gateways', it should be clear that these are not required to be tall buildings but could, for instance, be marked by different street surfaces or pavement widths to bring about different traffic behaviour, or attractive building form such as the Tally-Ho pub."</p> <p>(ii) "North Finchley has considerable integrity and historic interest in its townscape, reflecting its predominant phase of development in the Victorian period. By the 1890s the urban settlement was fully formed. Its heritage, while not designated as a conservation area, has much coherence and quality and pre-dates much of the townscape within the rest of the Borough. Careful consideration of the Victorian and Edwardian buildings lining the High Road and the adjoining areas, and other distinctive features of the town centre is an essential foundation for achieving enhancements to the benefit of the local area, and the vitality of the town centre in the long term."</p> <p>(iii) "The references to local character being enhanced are helpful. There is a clear opportunity in North Finchley to promote its future vibrancy and vitality through enhancement of its heritage."</p>	Historic England's comments were considered as part of the consultation on the North Finchley Town Centre SPD.	No
Highways England	General	<p>Thank you for consulting us on the Regulation 18 consultation for the Barnet's Draft Local Plan, setting out how the development and growth requirements of Barnet for the period 2021 to 2036 will be met. On behalf of the Secretary of State for Transport, Highways England is responsible for managing and operating a safe and efficient Strategic Road Network (SRN), i.e. the Trunk Road and Motorway Network in England, as laid down in Department for Transport (DfT) Circular 02/2013 (Planning and The Strategic Road Network). We are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. We wish to draw your attention to Highways England's document 'The Strategic Road Network, Planning for the Future: A guide to working with Highways England on planning matters' (September 2015). This document sets out how Highways England intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. The document indicates that Highways England will review and provide comments on any amendments to local plans proposed by local planning authorities that have the potential to affect any part of the SRN. We do not consider it appropriate to state our support or objection to particular proposals, therefore instead this letter clarifies our views on a number of aspects of the Local Plan primarily focused on the potential impacts of all sites on the SRN and highlights junctions which may experience significant increases in traffic. This letter will also consider the evidence base used to understand the impact of development and the potential funding of any infrastructure schemes that are required. Our interest in local plans is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. Given that the M1 motorway passes through the London Borough of Barnet and the A1 which forms part of the SRN is situated on the northern border of the borough, we are keen to understand what impact the Barnet Local Plan will have on the SRN for which we are responsible.</p>	Our Strategic Transport Assessment clarifies the impact of growth on the Strategic Road Network.	Yes
Federation of Residents Associations in Barnet (FORAB)	General	<p>From the above we have identified five major areas of concern:</p> <p>1. The increasing in housing numbers, aspiring to 46,000, is unlikely to be wholly achievable in the timescale, but from the sites identified we recognise that delivery could certainly exceed 30,000. We do</p>	Please see responses to more detailed points by FORAB in the Schedule	Yes

		<p>conclude that the lower target of 33,460 is what is realistic and that figure should properly form the basis of the Plan.</p> <p>2. What is evident is that the vast majority of these planned new homes will be in high rise blocks on densely developed sites, with the majority of homes just one or two bedrooms. Faced with this reality the Plan should ensure that the existing stock of three to five bedroom homes is robustly protected against losses. This is not the case with the policies as currently presented, and in particular the notion of major intensification in and around town centres is ill-conceived in this respect.</p> <p>3. A more robust tall buildings policy is required to protect existing low rise areas.</p> <p>4. The proposals for town centres are outdated and need revising to reflect the current reality of retailing.</p> <p>5. There is a major mismatch between population growth and a largely unrealistic transport strategy.</p>	<ol style="list-style-type: none"> 1. The Local Plan is premised on delivery of a realistic housing target of 35,460 new homes by 2036 as set out in the London Plan. 2. The Plan does protect and safeguard family housing as set out in HOU02 and HOU03. Having the supply to deliver against the housing target should help safeguard family homes 3. Protections are in place for areas characterised by suburban housing through CDH04 4. Town centre policy revised to reflect overhaul of the Use Classes Order in Sept 2020. 5. Further evidence published on transport – Strategic Transport Assessment as well as Long Term Transport Strategy 	
Barnet Society	General	Pressure to maximise residential development numbers means that bus users will be disadvantaged by narrow roads, lack of through roads and/or distance between home and bus-stop. The Local Plan should ensure that public and sustainable forms of transport (e.g. cycles and walking) are properly designed into housing masterplans from the outset.	Policies in the plan (e.g. GSS10 penultimate bullet) require that proposals ensure active travel to promote walking and cycling and demonstrate access to public transport.	No
London Diocesan Fund	General	The Council state that a significant additional element of housing growth will come forward on small sites which are not yet formally identified (5,100 homes) based on previous trends. The NPPF (2019) states that where an allowance is to be made for windfall site as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. We support the view that smaller site play a significant part to play in housing delivery, however the Council have not provided evidence to justify this figure and so cannot be considered a reliable source of housing. Barnet should seek to explore other supplies such as Green Belt land, such as Rectory Field, to deliver this. The London Plan Examiner's Report also places considerable uncertainty on the delivery of small sites and we consider that the Council should focus on the delivery of appropriate sites in the Green Belt which can be identified and brought forward quickly.	Barnet has a housing target of 35,460 new homes and can demonstrate through this Local Plan a deliverable supply against this target. Small sites have an important role to play in housing delivery. Introduction of design codes will help to realise their potential and protect valuable Green Belt land from development.	No
LB Enfield	General	Thank you for the opportunity to comment on the emerging Barnet Local Plan Preferred Approach. Enfield Council will also be undertaking a Regulation 19 consultation on the draft New Enfield Local Plan later this year, setting out detailed policies and proposals for the next plan period and beyond. At present, several technical evidence studies are underway and further engagement is planned. At our Duty to Cooperate (DtC) meeting held on 10 February 2020, we discussed several strategic matters focused on establishing a greater understanding of cross-borough transformational growth and regeneration potential and the need for joint evidence to build consensus into our emerging respective Local Plans. We are keen to continue this cross-boundary working arrangement as some of the strategic matters relate to housing growth, infrastructure provision and place making. Our respective authorities both identified the need to work together to identify future growth opportunities within the emerging New Southgate Opportunity Area and generate a joint business case for future orbital public transport investment. From Enfield's perspective we look forward to continuing cross-boundary development conversations particularly regarding housing growth, infrastructure planning and town first centres strategy that both authorities are progressing.	This will be reflected in our Statement of Common Ground with LB Enfield	No

Department of Education	General	Whilst it would appear that there is currently sufficient capacity across LB Barnet, given the expected housing growth and large-scale regeneration across the borough, it is therefore important that a sufficiently flexible approach to school planning is taken. DfE supports the principle of LB Barnet safeguarding land for the provision of new schools to meet government planning policy objectives as set out in para 94 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education. Need to have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.	Support for the Council's approach to safeguarding land for the provision of new schools is welcomed.	No
Lansdown	General	It is promising to see the plan prioritising sustainability in locating growth and development. Doing so is crucial to ensuring development results in the best outcomes for people and places, whilst also combating and acting on climate change threats that will arise in the near future.	Support noted and welcomed.	No
St William Homes LLP	General	St William are generally supportive of the Barnet draft Local Plan; the high level principles to seek efficient use of previously developed land to meet boroughs needs is strongly supported as is the Councils vision to focus growth around town centres and other key transport nodes. We understand the Borough's challenge in delivering the levels of forecast growth balanced against the need to maintain the quality of the environment.	Support noted and welcomed.	No
Former MHNF	General	A major initiative needs to be led by the Council to develop a thriving local economy for the future. It is a great shame that in Mill Hill we have lost the 1200 jobs from the National Institute for Medical Research. Public Health England too will soon be leaving Colindale. The loss of such specialist scientific staff and the support roles need to be replaced. Such a programme to be pro-active in bringing growing businesses to Barnet is long overdue.	The Council considers that through this Local Plan it sets out the conditions for growth which includes enhancing the local economy.	No
HADAS	General	Barnet HADAS and the Greater London Archaeological Advisory Service (GLAAS) need to work together to ensure that the draft Barnet Local Plan is referring to the most up to date archaeological information Use of phrase Archaeological Priority Area to be adopted throughout plan. In the meantime, HADAS considers that the phraseology used in the plan should be amended from "Local Areas of Special Archaeological Significance" to "Archaeological Priority Areas". This would require amendment in paras: 6.21.1, 6.21.5 Table 12 p. 119, Policy CDH08 (a)	Agreed. CDH08 has been revised to emphasise developers working with HADAS and GLAAS	Yes
Mayor of London	General	Mayor published his draft new London Plan for consultation on 1st December 2017. The Panel's report, including recommendations, was issued to the Mayor on 8th October 2019 and the Intend to Publish version of the London Plan was published on the 17th December 2019. Publication of the final version of the new London Plan is anticipated in Summer 2020, at which point it will form part of Barnet's Development Plan and contain the most up-to-date policies. The Mayor has received the response from the Secretary of State to his Intend to Publish London Plan and is considering his response. In due time, my officers will be happy to discuss the implications for Barnet's Local Plan, particularly in relation to Intend to Publish London Plan Policies E7 and G3 which are referenced in my letter below. Barnet's new Local Plan will be required to be in general conformity with the new London Plan. The Intend to Publish London Plan and its evidence base are material considerations in planning decisions. Please note that some of the policy numbering has changed from the original consultation draft London Plan 2017 to the Intend to Publish London Plan 2019. Mayor has strong concerns regarding Barnet's approach to restate renewal, MOL and car parking. He will provide his opinion on general conformity with the London Plan at the Regulation 19 stage. My officers would especially like to discuss the proposed alterations to the MOL boundaries, the policies on estate renewal and car parking standards as well as any implications from the Secretary of State Directions to the Intend to Publish London Plan.	The Council has made a number of revisions to the Local Plan in order for it to be in general conformity with the London Plan of March 2021.	No

Countryside Properties	General	Countryside was selected by the LBBarnet (LBB) as its preferred development partner for the regeneration of the Dollis Valley Estate following a competitive process. Dollis Valley Estate is located on the northern outskirts of Chipping Barnet, near High Barnet, the last station on northern line. The Estate is identified in the Council's 2012 adopted Local Plan – Core Strategy Development Plan Document (DPD), as one of the Priority Housing Estates for regeneration and it has been a key priority for the Council for many years to regenerate the Estate. At present, the Dollis Valley Estate (Phases 1 to 5) is halfway through the redevelopment process. To date, the Estate regeneration has already been successfully delivered for Phases 1 and 2. Countryside support the strategic aspiration of Policy GSS10 (Estate Renewal and Infill) to work in collaboration with local communities to develop a shared vision for estate regeneration schemes, including those currently underway. The principle of responding to the needs of existing households and demonstrating an improvement in the quality of the housing stock is fully supported and is reflected in the ongoing regeneration of the Dollis Valley Estate. Whilst the ambition to achieve a net increase of housing units is welcomed, we would highlight that where design or viability constraints apply, then this requirement should not restrict estate regeneration proposals coming forward. Where the needs of existing households are being met, any requirement for a net increase of housing units should be applied flexibly and taking into account site specific circumstances. In supporting the ongoing regeneration of the Dollis Valley Estate, Countryside is seeking to explore further development opportunities in the local area. This ambition includes continuing to meet the borough's local housing needs as well as securing benefits for the local community, as has been the case on the estate to date. As part of the local plan review process, Countryside would welcome the opportunity to work with the planning authority to meet this aspiration. In summary, as recognised within the draft Local Plan, estate regeneration represents a strategic priority for the borough. Countryside have been working with Barnet Council to deliver the Dollis Valley Estate regeneration which has been delivered successfully to date. In supporting the completion of this project, we would encourage the new draft Local Plan to provide for sufficient flexibility with regard to estate regeneration schemes, to ensure that the Plan is effective and positively prepared.	The Council welcomes these comments from Countryside Properties	No
Brent Cross Dev Partners (QUOD)	General	In summary, the DPs are generally supportive of the Draft Local Plan and in particular the recognition that the regeneration of BXC will need to deal with changes in economic and market conditions over a long period of time and as such further development proposals may come forward. However, the DPs consider that the proposed amendments identified in this letter should be made so as to ensure that a sound plan is prepared.	The Council welcomes this support	No
LB Brent	General	Brent Council welcomes the opportunity to respond to the London Borough of Barnet's consultation on its draft Local Plan (Reg 18) Preferred Approach Consultation. Brent Council is generally supportive of policies and aspirations within the draft Local Plan and is keen to continue joint working relationship with the LB Barnet to deliver benefits for the local area and communities. We have provided comments on the draft Local Plan which we hope will prove useful in informing Barnet's Local Plan policies.	This will be reflected in our Statement of Common Ground with LB Brent.	No
LB Harrow	General	LB of Harrow broadly supports the Barnet draft Local Plan (Regulation 18), and acknowledges the pressures faced in delivering an effective and efficient Local Plan. LB Harrow does not object to any of the policies within the draft plan, however, would welcome further discussion on matters that are cross boundary in nature with the potential to impact LB Harrow and its residents. Notwithstanding the general support of the current draft plan, Harrow would welcome the continued opportunity to comment further on the development of the plan going forward and any subsequent implementation. We reserve the right to refine our position on the draft Barnet Local Plan as it further develops and as LB Harrow progresses its own evidence base and Local Plan review.	This will be reflected in our Statement of Common Ground with LB Harrow	No
Land owner at 360-366 Burnt	General	We write on behalf of the owners of land at 360-366 Burnt Oak Broadway. In general we are supportive of the Draft Regulation 18 Local Plan and the positive and encouraging policy approach to delivering housing in an appropriate and planned manner that will significantly contribute to the Borough's	The Council welcomes this support.	No

Oak Broadway, (Avison Young)		increased housing targets. Our representations are supportive of Policies GSS01; GSS05; GSS11; CDH01; and CDH04.		
Barnet CCG	General	Overall, the CCG supports the objectives and policies of the plan.	The Council welcomes this support.	No
TfL	General	We strongly welcome the Council's aspiration support growth in Barnet while enabling a greater mode share for walking, cycling and public transport use. In particular, we welcome the ambitions set out in the draft local plan to: reduce car use, implement the Healthy Streets Approach and achieve the Mayor's Vision Zero ambition. We are pleased to see the plan's recognition of the importance of active travel in improving health outcomes and the role reducing car journeys has in improving air quality. We commend the Council on the considerable progress they have made on developing car parking standards that will make growth in the borough more sustainable, taking into account the extent of alternatives in different locations. We do however have concerns regarding the standards not reflecting the Intend-to-Publish London Plan approach to Town Centre/and Opportunity Area residential parking, and the approach at PTAL 5, as provision of up to 0.5 spaces per dwelling is significantly higher than the London Plan. We also have concerns about how CPZs are approached in regard to the latter, and the use of a connectivity measure that could be open to challenge, but we would welcome further dialogue on this issue. While the Intend-to-Publish London Plan does not differentiate standards based on unit size, we do not object to Barnet doing so in principle providing that overall provision is within the London Plan standards. We welcome the Council's support for delivering improved rail capacity and infrastructure in the borough. To better support this, we urge the Council to ensure that vital land necessary for the operations and enhancement of London Underground and rail services – particularly the Northern line – are sufficiently protected. Where there are opportunities to do so, development proposals should also contribute towards provision of step-free access and capacity enhancement at stations. We welcome the Council's support for the West London Orbital rail scheme, which will improve public transport connectivity within Barnet and to neighbouring boroughs. We would emphasise the importance of the approach above to maximising sustainable travel and minimising provision for car use to making the business case for the scheme as strong as possible. We also welcome the support the Council give to Crossrail 2 and the major benefits the scheme could bring to Barnet and to New Southgate in particular. We strongly welcome the Council's ambition for improved public transport connectivity in the borough, including through buses. We are keen to continue this discussion to identify how best to achieve this, including identifying where the most significant connectivity gaps currently exist, which may not be purely radial nor orbital. We urge the Council to ensure developments play their role in supporting higher levels of services and improved reliability, such as through bus priority measures. Our responses to specific points in Barnet's draft Local Plan are set out in more detail in the attached appendix. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth in Barnet and across London.	The Council's response to detailed points from TfL on sections of the Local Plan is set out elsewhere in this Schedule	Yes
Cesira de Chiara	General	With a 15% projected increase in population together with reductions in funding for community infrastructure such as healthcare, the Barnet Draft Plan suggests unsustainable development.	The Local Plan is supported by the Infrastructure Delivery Plan which provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No
Client interested in North Finchley TC (Quod)	General	On the whole, our client is supportive of Barnet's approach to the draft Local Plan. However, it is important that the emerging Plan does not constrain local growth projections, in particular in those centres that are prioritised as being able to accommodate growth as set out in supplementary planning guidance. We trust that you will fully consider our client's comments and ensure that any emerging policy does not prevent the successful regeneration of North Finchley from being realised.	The Local Plan seeks to manage rather than constrain growth. The Council welcomes this support and shared ambition for the successful regeneration of North Finchley.	No

Mary O'Connor	General	Not enough time to comment and also contains too much use of 'may' and 'should', leading to believe it is not a requirement.	The Reg 18 has been subject to extensive consultation. National policy sets the limits for planning terminology as part of a flexible and responsive planning system	No
Former MHNF	General	Barnet Council doesn't have a single FTSE 100 company headquartered in its borough. Despite being 20-30 minutes commuting time to Central London, having lower cost housing and more green spaces, we are not attracting significant commercial enterprises. We are undoubtedly popular for micro-businesses, but with the changes to IR35 many will undoubtedly fold. We could be famous for having the most company closures over the next 12-24 months and the fewest start-ups. Our Town Centres are not thriving as they should be, in part because of the loss of office workers. We have already recommended the adoption of Polycentric initiatives as the way forward. We do not just want local jobs in low level service roles but medium and highly skilled roles as well, in light industrial areas, and professional services etc. We have in mind those who leave employment to raise a family and on return, juggling child-care, cannot afford the commute time needed by a job in Central London. They need the stimulation they were used to, in a local setting where they can be productive while having time to drop-off and collect their primary aged children each day. The Council needs to be pro-active in seeking out mid and large-scale organisations who could be attracted to bringing their business to Barnet. We could possibly be attractive to high-technology companies who might otherwise settle around Shoreditch or in Cambridge. We should try to create a Science and Technology park in Barnet to attract potential investors.	Ambitions to attract inward investment to the Borough are set out in a range of Council strategies and initiatives including the Growth Strategy. A key objective of the plan is to ensure that housing provision is matched by growth in jobs. The Plan sets safeguards to protect employment uses as well as identify new opportunities for jobs and skills and training.	No
Dr P. M. Ashbridge	General	This historic North Finchley townscape, lining the centuries-old Great North Road and complemented by the many surviving Victorian and Edwardian houses in its side roads, is indeed, "an irreplaceable resource".It enhances the Town Centre and needs to be safeguarded from incautious or negligent development.	These important issues on townscape character were considered as part of the consultation on the North Finchley SPD.	No
Department of Education	General	DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. See Developer Loans for Schools prospectus for more information.	This financial support for new schools is reflected in the supporting text for CHW01	Yes
CPRE	General	We support the intensification of areas of extensive surface car parking and low-rise industrial / commercial space and more generally very much support development which is based around active travel and public transport, is 'car-free', removes and/or controls car parking spaces and moves the borough away	This support is welcomed.	No
Friern Barnet and Whetstone Residents' Association	General	Whilst it is appreciated that those charged with writing the draft Plan will no doubt have been keen to ensure that, as a document, it attracts and retains the reader's attention, we believe that the variety of the terminology used in framing the Policies creates confusion and uncertainty and that greater precision of drafting is required for a document that will inevitably be subject to technical and legal interpretation. To illustrate the point, consider the following examples: Policy HOU01 Affordable Housing: The Council will ... expect...require...seek Policy HOU04 Specialist Housing: 1. Proposals for people with social care and health support needs should...2. Proposals for new HMOS must...3 Proposals for purpose built student accommodation should...4 Any proposals for large scale shared-living accommodation will be expected to demonstrate...Does "expect" mean the same as "require"? If not, what is the difference in terms of the extent of the policy? If the meaning is the same, why create uncertainty by using different words? What is the difference between "expect" and should? Etc, etc. Such ambiguities need resolving throughout the document.	We have looked at consistent use of terminology as part of the Reg 19 production. National policy sets the limits for planning terminology as part of a flexible and responsive planning system	Yes
LB Enfield	General	As agreed thorough our recent cross borough meeting an initial Memorandum of Understanding (MoU) is to be drafted between respective officers setting out key working groups related to the New Southgate Opportunity Area, Strategic Public Transport Investment, Town Centres and the establishing future	This will be reflected in our Statement of Common Ground with LB Enfield	No

		Regional Parks and rewilding of the Chase area within Enfield. This can then form the evidence of collaborative working that can support respective Local Plan examination processes.		
Friern Barnet and Whetstone Residents' Association	General	We generally support the responses of FORAB and The Finchley Society, which we have had the opportunity of reading.	We refer to Council responses to issues raised by FORAB and Finchley Society	No
LB Harrow	General	Broadly supportive and would welcome further discussion on matters that are cross boundary such as Edgware SPD, Burnt Oak OA, A5 and tall buildings.	We welcome the support and will continue to work with Harrow, including the SPDs mentioned. This will be reflected in our Statement of Common Ground	No
Dr P. M. Ashbridge	General	Rather than being taken as a pattern for the future, the two tall, badly-designed misfortunes at the N12 Kings Way/Ballards Lane gyratory (grey Finchley House and the 11-storey block of flats) should somehow be enabled to fade into the background (or disappear?).	When more detailed proposals come forward in North Finchley there will be an opportunity to comment on their design	No
Lodge Lane Residents Association	Typos/Grammatical errors	<p>2.3.1 Last sentence doesn't make sense as currently worded. Remove "By"</p> <p>3.1.1 needs a comma before "Barnet" or rewording.</p> <p>GSS02 alternative 1 – "would be to inappropriate" should be "would be inappropriate".</p> <p>GSS12 "development of and above" should be "development on and above"? Not clear what's being said here.</p> <p>5.4.6 remove brackets on 2nd line.</p> <p>5.5.9 Table 5 should say Table 6</p> <p>HOU05 4 doesn't make sense! Remove "are identified" from the end of the para.</p> <p>6.12.1 line 2 "resident" should be "residents"</p> <p>6.15.3 2nd sentence: "are an important to make the area welcoming": an important what?!</p> <p>CHW 02 should be CHW02</p> <p>8.14.5 superfluous comma at end of line 1.</p> <p>9.4.5 should be "over time" not "overtime".</p> <p>10.1.2 line 3 "it's" should be "its". Line 4 "adaptation, to" should be "adaptation to".</p> <p>Table 17 entry 3 "form" should be "from".</p> <p>10.5.23 line 6 missing period after "lands".</p> <p>TRC03 b) line 2- "be place" should be "be in place".</p> <p>Site 48 Site Description "three story officer" should be "three story office"</p>	The Council welcomes this input and has changed text as requested	Yes

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**Equalities Impact Assessment for
Barnet Local Plan (Reg 19)
May 2021**

Introduction

1. An EqIA is a tool to help meet legal duties to ensure that equality issues are fully considered as part of the plan making process. One of the primary aims of the EqIA is to identify and assess potential effects arising from a plan, policy or programme for people sharing one or more protected characteristic. The Equality Act imposes a duty on public bodies to have due regard to the need to:
 - Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
 - Advance equality of opportunity between people who share a protected characteristic and those who do not
 - Foster good relations between people who share a protected characteristic and those who do not.
2. The EqIA identifies the likely effects on discriminatory practices, the potential to alter the opportunities of certain groups of people, and/or affect relationships between different groups of people which could arise as a result of proposed new policies within the draft Local Plan.
3. The Equality Act identifies the following as 'protected characteristics':
 - Age
 - Disability
 - Marriage and Civil Partnership
 - Race
 - Religion or belief
 - Sex
 - Pregnancy and Maternity
 - Sexual Orientation
 - Gender reassignment
4. In line with statutory requirements of the Equality Act (2010), the EqIA has given due regard to the need to remove or minimise disadvantages and accommodate the needs of equalities groups.

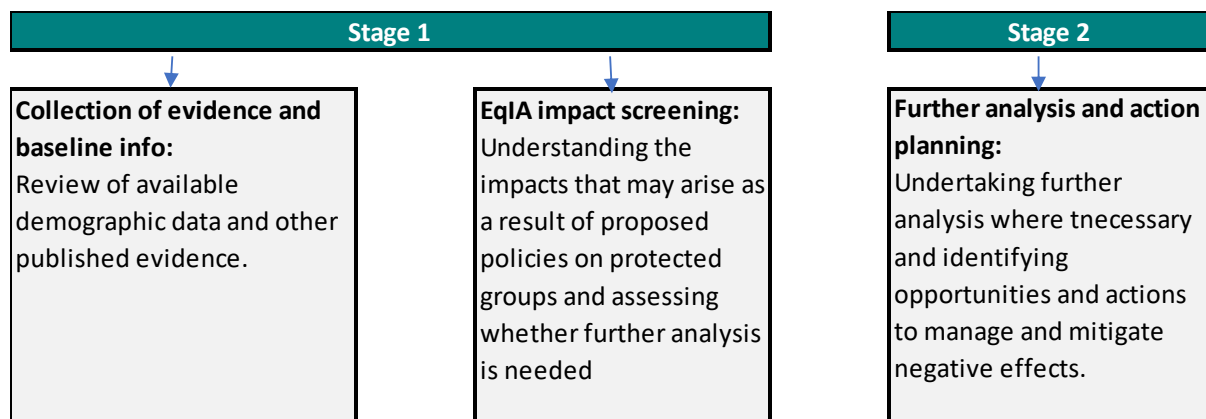
Local Plan Review

5. The focus of the Local Plan is to sustainably manage growth so that it takes place in the most appropriate locations, to meet the need for homes, jobs and services, while continuing to conserve and enhance the features that make Barnet an attractive place to live, work and study.

6. The National Planning Policy Framework (NPPF) 2019 states that local plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings (paragraph 15).
7. The Local Plan will establish a vision for growth and development over a 15-year period (2021 – 2036) as well as providing a strategy and objectives to guide individual policies. The Local Plan has the potential to impact upon equality as its implementation will affect all those who live, work and visit the Borough.
8. This Equality Impact Assessment (EqIA) summarises and assesses the potential impacts of the Local Plan policies upon protected groups. This assessment considers data about protected characteristics and groups in the area covered by the Plan, and information about other themes likely to affect protected groups.
9. Information for this assessment has largely been gathered from the 2011 Census data, the Joint Strategic Needs Assessment (JSNA) and the Scoping Report of the draft Local Plan Sustainability Appraisal.

Approach to the EqIA

10. The approach to the EqIA employs the following steps:



Stages of the EqIA

11. The Council has developed a two-stage approach to the analysis of equality issues. The first stage (which can be repeated as the local plan policies develop) involves the collection of baseline data to understand the equalities profile of the borough and some of the potential issues facing protected groups.
12. This has helped inform the EqIA Impact screening which assesses the potential impact of the proposed policies and that due regard has been considered.

13. Following stage 1, further analysis may be given where there are concerns about the impact draft policies.

Methodology for identifying impacts.

14. The EqIA Screening Assessment aims to identify where there is likely to be a greater effect on equality groups than on other members of the population. The assessment of impacts across the EqIA screening is predominately qualitative and describes, where possible:

- whether the impact is positive, negative or neutral.
- whether the impact will be low, medium or high based on the severity of the impact and the amount of change relative to the baseline.

Score	Description
High	H
Medium	M
Low	L
Positive	+
Negative	-
Neutral	O

15. These scores will be applied together to assess the overall effect of the proposed policy on equalities groups.

Baseline and assessment of protected characteristics

16. This section presents the baseline data for each protected characteristic group.

Age

Table 1: Age range proportions – 2011 Census data

Age	Barnet (%)	Greater London (%)	National (%)
Age 0 to 4	7.4	3.68	6.26
Age 5 to 7	3.9	2.22	3.45
Age 8 to 9	2.4	5.59	2.16
Age 10 to 14	6.0	1.15	5.81
Age 15	1.2	2.28	1.23
Age 16 to 17	2.5	2.34	2.48
Age 18 to 19	2.1	7.71	2.59
Age 20 to 24	6.7	10.19	6.78
Age 25 to 29	8.8	25.34	6.89
Age 30 to 44	23.5	17.00	20.64
Age 45 to 59	17.5	4.19	19.39
Age 60 to 64	4.7	5.79	5.98
Age 65 to 74	6.7	3.78	8.59
Age 75 to 84	4.5	0.99	5.52
Age 85 to 89	1.3	0.52	1.46
Age 90 and over	0.8		0.76

17. The age structure of Barnet is relatively young, with proportionally more people aged between 0 and 17 years and 30 to 64 years when compared to that of Greater London and nationally. There is a lower proportion of people aged between 20 to 29 compared to Greater London.

18. The number of people aged 65 and over is predicted to increase by 33% between 2018 and 2030, compared with a 2% decrease in young people (aged 0-19) and a 4% increase for working age adults (aged 16-64), over the same period.

Assessment

19. Local Plan policies consider the needs of older people; for example, policies such as HOU02, CDH01, CDH02 and CDH03 seek to ensure housing and the built environment is accessible, adaptable and provides a range of different housing sizes and types of accommodation that are considered beneficial for older people. Policy HOU04 also highlights the Borough's requirements for residential care provision. These policies are therefore considered to have positive impacts.

20. Older people tend to make fewer and shorter journeys and may be more dependent on public transport. Therefore, transport policies which seek to ensure improvements to public transport and interchange facilities will benefit this group,

and town centres policies which protect shops and services close to homes will be beneficial in terms of ensuring easy access for the elderly to shopping and other facilities, particularly to meet their day to day needs, as well as cultural and entertainment facilities locally.

21. Older people may also experience mobility difficulties and therefore policies which seek to protect local character such as the heritage policy may conflict with the needs of older people in relation to adaptation to improve accessibility for all.
22. With reference to young people, policies which encourage sport and physical activity including access to public open space, play space, are considered to be an important asset to meet the needs of this group. Young people are particularly encouraged to engage in healthier lifestyles, although it is noted that this will also be beneficial for all members of the community. Policy CHW01 is considered to be beneficial to this group as it promotes community facilities that young people can use and seeks to ensure that programmes for capital investment in schools and services for young people addresses the needs of a growing, more diverse and increasingly younger population.,

Disability

23. The 2011 Census indicated that within Barnet, 6% of the overall population have their day to day activities limited a lot by their health, while 14% of residents suffered from a long-term health problem or disability.
24. The west and east regions of the borough have the biggest proportion, with the proportion of people whose daily lives are affected by a long-term condition or disability ranges from 2-14%. Within the west of the borough, Burnt Oak, Childs Hill and Golders Green comprise some of the biggest areas, between 11% and 13%.
25. This trend is replicated across the East, where the highest proportions range between 11 and 14%, with the majority of region falling between 5% and 9%.
26. In 2018, there was an estimated 6,100 adults in the Borough aged under 65 with a learning disability and 1,176 older people (aged 65+) giving a total of 7,276 adults for Barnet. The prevalence of physical disability (both moderate and severe) increases in older age groups. In 2018, there was an estimated 23,735 adults in Barnet with either a moderate or serious physical disability. Projecting Adult Needs and Service Information (PANSI) indicate that this figure may increase to 28,907 by 2035, a rise of 22%.

Assessment

27. In terms of physical or sensory disability, the design of the built environment is important for helping people to move around easily. Policies under character, design and heritage consider the needs of the disabled population and specifically state that the design of the built environment should be inclusive and accessible. However, there is potential for conflict between making accessibility

improvements and preserving/enhancing historic features on designated assets within the Borough.

28. Policy CDH02 sets out Inclusive Design and Access Standards and clearly states that all new dwellings should meet Building Regulation M4 (2) for 'accessible and adaptable dwellings'. One new dwelling in 10 should meet Building Regulation M4 (3) for 'wheelchair user dwellings'. This is considered to impact positively on disabled people to ensure an adequate choice of appropriately accessible housing options are available.
29. Policies under Community Uses, Health and Wellbeing promote inclusive community infrastructure that provides access for all, and also encourage new community uses in town centres and local centres which makes them more accessible to all groups but particularly those with mobility issues.
30. Policies which seek to guide development to areas accessible by public transport could benefit people with physical disabilities, making it easier for them to access facilities within their local area. Policies which would result in improvements to accessibility of transport facilities and interchange arrangements are also considered to benefit disabled people, improving accessibility and promoting social inclusion. The parking standards policy TRC03 considers the need for provision of adequate disabled parking.
31. Data from the Equalities and Human Rights Commission has shown that disabled people have much lower employment rates and are more likely to be economically inactive than non-disabled people¹. In 2018, the total employment rate was 51% among disabled people compared to 81% among non-disabled people². Employment policies may facilitate employment growth or provide opportunities for starting businesses that will be beneficial to this group at a local level.

Marriage and Civil Partnership

32. The 2011 Census indicated that Barnet has a higher proportion of married couples (47%) when compared with Greater London (40%), but a lower proportion of same sex civil partnerships (0.21%) than Greater London (0.42%)³. Approximately 37% of the population is single and 16% either divorced, widowed or separated.

Assessment

33. It is not anticipated that the policies contained within the local plan will have any significant effect on this protected group

¹ Disability, Skills and Employment: A review of recent statistics and literature on policy and initiatives (2010) Riddell, S. Edward, S. Weedon, E. & Ahlgren, L.

² Annual Population Survey (2108)

³ Census data 2011

Race

34. Table 2: Population by ethnicity, 2015 (Barnet and Regional)

Ethnicity	Barnet (%)	Outer London (%)
White	61.3	57.8
Black, Asian and Minority	38.7	42.2
Other Asian	9.3	8
Indian	7.5	8.9
Other	7.1	4.8
Black African	5.8	6.8
Black other	3.2	4.2
Chinese	2.4	1.2
Pakistani	1.6	3.6
Black Caribbean	1.3	3.4
Bangladeshi	0.7	1.3

Source: GLA Projections (Preferred Options Projections)

35. Table 2 shows that Barnet has a higher proportion of people from within the white ethnic group than outer London. Almost 40% of the boroughs population is from Black, Asian or Minority Ethnic (BAME) groups. Barnet also has higher rates of the population within Other; Other Asian and Chinese ethnic groups.

36. GLA projections indicate that the proportion of BAME people in the Borough will increase by 2.3% by 2030. The ethnic groups with the largest projected increase during the same period are 'Other ethnic groups' and 'other Asian group' but all BAME categories are expected to show increases overall.

37. Based on 2011 Census data, the most commonly spoken languages after English were Polish, Arabic and Gujarati.

38. Romany Gypsies and Travellers are recognised in law as distinct ethnic groups, therefore they are protected under the Equality Act from discrimination on the basis of race. The West London Gypsy, Travellers and Travelling Show people Accommodation Assessment (GTAA) identified no current or future need in Barnet for pitches and plots for Gypsy and Traveller households as well as Travelling Show people.

Assessment

39. There are variations in ethnic diversity between Barnet's wards. Colindale, Burnt Oak and West Hendon have higher proportions of people from BAME populations. Research has shown that people from BAME backgrounds are more likely to have difficulty accessing suitable housing, or are more likely to be living in dwellings unsuitable for their needs⁴. In addition, there is a higher proportion of

⁴ Ethnic Inequalities in London, Capital for All (2015) Elahi, F. Khan, O.

BAME groups that live in the private rented sector⁵. BAME minorities are also over-represented in social housing relative to general population levels. 20.7% of all socially rented housing is rented to black ethnicities, markedly higher than the 7.7% of the population in Barnet that describe themselves as black. This is also true of the mixed ethnic group, who rent 8.0% of all socially rented housing compared to a population share of 4.8%⁶. Housing policies seek to ensure a suitable mix of housing and tenure that reflects local need, including the provision of additional family sized dwellings across all tenures. This is considered to provide potential benefits to BAME communities, some of which tend to have larger family sizes and may be housed in unsuitably sized accommodation.

40. In addition, it is recognised that ethnic minority BAME groups generally have worse health than the overall population, although some groups fare much worse than others⁷. Evidence suggests that the poorer socio-economic position of BAME groups is the main factor driving ethnic health inequalities. Policies under Community Uses, Health and Wellbeing are considered to impact positively on all groups, but particularly race as they will encourage adequate provision of services and facilities and infrastructure to meet community needs and promote healthier lifestyles.

41. Furthermore, data shows that there are higher unemployment rates among BAME groups, particularly amongst Black, Pakistani and Bangladeshi ethnicities⁸. In addition, evidence shows that London has a high proportion of SME's and micro businesses that are BAME owned enterprises⁹. Draft policies under Economy will be beneficial to this group as they promote affordable workspace and increase job opportunities.

Religion

42. According to the 2011 Census over 75% of the population indicate that they have a religious affiliation. Approximately 41% of the population described their religion as Christian, making this the most common religion within the Borough. There is a significantly high proportion of people describing themselves as Jewish (15%) when compared with London average (1.8%) or nationally (0.5%). Over 16% of the population were recorded as having 'no religion'.

43. Christianity is particularly concentrated in the Centre and East of the borough, with Underhill, East Barnet and High Barnet wards averaging over 50% of the population.

⁵ Housing and the older ethnic minority population in England (2019) Race Equality Foundation

⁶ Census 2011

⁷ Local action on health inequalities Understanding and reducing ethnic inequalities in health (2018) Public Health England.

⁸ Ethnicity Facts and Figures (2019) Office for National Statistics

⁹ Redefining London's BME-owned Businesses (2005) London Development Agency

44. By contrast, the Jewish population is most prevalent in wards across the south and east of the Borough in the wards of Garden Suburb, Golders Green and Hendon, accounting for 30% of the populations,

45. Furthermore, the highest proportion of Muslim population is centred in the west of the borough. Colindale, Burnt Oak and West Hendon are particularly prevalent. Indeed, the 2011 CCensus estimates that the Muslim population accounts for almost 20% of the population in Colindale

Table 3: Religion 2011

Religion 2011	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	No religion	Religion not stated
Barnet	41.20%	1.30%	6.20%	15.20%	10.30%	0.40%	1.10%	8.40%	8.40%
London	59.40%	0.50%	1.50%	0.50%	5.00%	0.80%	0.40%	7.20%	7.20%
England	48.40%	1.00%	5.90%	1.80%	12.40%	1.50%	0.60%	8.50%	8.50%

Assessment

46. The community facilities policies seek to ensure provision of facilities to meet people’s needs and this includes faith facilities and religious meeting places, therefore policy CHW01 seeks the enhancement and replacement of existing facilities where there is an identified need to benefit religious groups. The remainder of the Local Plan policies are considered to have a neutral impact on religious or faith groups.

Gender

47. The resident population in 2011 in Barnet was 356,286 of which 51.55% was female and 48.45% was male. However, the Joint Strategic Needs Assessment (JSNA) for Barnet shows that women have a longer life expectancy than men¹⁰. This is likely to have implications on the female population of the Borough. For example, there is a higher proportion of women in the borough who suffer from circulatory and respiratory diseases¹¹. In addition, there is a higher proportion of women across all age groups, but particularly in those aged 75+ who have been diagnosed with dementia¹². These specialist needs will require access to appropriate care services and specialist housing that supports independent living. Housing polices such as HOU04, CDH02 and CHW02 are considered to be beneficial to this group.

¹⁰ JSNA shows that the average life expectancy for women in Barnet is 85 and 83 for men.

¹¹ Barnet JSNA (2019)

¹² Barnet Dementia Needs Assessment (2019) Kayikci, S.

48. Car ownership is lower amongst women than men¹³, therefore, women are more likely to travel by public transport, particularly buses, to access local services. Therefore, draft transport policies which seek to make improvements to public transport and support the healthy streets approach to encourage active travel will benefit this group and other groups.

Pregnancy and Maternity

49. In 2016, there were 5,301 live births (2,726 males and 2,575 females) in Barnet (only 1.3% to mothers aged less than 20 years and 35.7% to mothers aged 30-34 years). The highest birth rate in Barnet was in women aged 30-34 years (116.5 per 1,000 women) in Barnet, compared to 107.3 per 1,000 for London and 112.4 per 1,000 in England, for the same age group (JSNA 2016).

Assessment

50. Pregnant women and parents of children may have specific housing needs due to reduced mobility and the need for additional space requirements associated with the care of young children. Housing policies in the Local Plan seek to ensure an appropriate mix of housing which could be beneficial to pregnant women and parents by offering housing choices.

51. Women may also be pregnant and/or accompanied by children, perhaps in buggies. Therefore, the transport policies which seek improvements to public transport accessibility and interchanges are likely to benefit women and other groups who do not have access to a car.

Gender Reassignment

52. There is no official Census data for the number of gender variant people in Barnet. However, the ONS estimates that the size of the transgender community in the UK could range from 65,000 to 300,000¹⁴.

Sexual Orientation

53. There is no borough data available on this protected characteristic. However, statistics relating to sexual identity are available nationally and at a regional level.

54. In 2016, estimates from the Annual Population Survey (APS)¹⁵ showed that 93.4% of the UK population identified as heterosexual or straight and 2.0% of the population identified themselves as lesbian, gay or bisexual (LGB). This comprised of:

- 1.2% identifying as gay or lesbian
- 0.8% identifying as bisexual

¹³ TfL Technical Note 12: How Many cars are there in London (2013)

¹⁴ ONS (2009): 'Trans Data Position Paper'.

¹⁵ Office of National Statistics (2017)

- A further 0.5% of the population identified themselves as “Other”, which means that they did not consider themselves to fit into the heterosexual or straight, bisexual, gay or lesbian categories.

55. In addition, 2011 Census data showed that 0.21% of Barnet residents (aged 16+) were in a same sex civil partnership.

Assessment – LGBT

56. For the LGBT group as a whole, some policies within the Local Plan are considered to have a positive impact, for example the local character and design quality as well as design policies to encourage natural surveillance and appropriate lighting levels, which could potentially help members of the LGBT group to feel safe. In addition, the community facilities policies encourage access for all and inclusivity within community facilities, which is considered to be beneficial for the LGBT group.

57. In relation to transgender people, it is known that members of the Trans community experience disproportionate levels of discrimination, harassment and abuse¹⁶ and therefore policies which encourage feelings of safety and security, as mentioned above, will be beneficial. It is also known that finding and retaining work is difficult for the Trans community¹⁷ so employment policies may facilitate employment or provide opportunities for starting businesses may be beneficial to this group.

¹⁶ Walters, Mark A, Paterson, Jennifer L, Brown, Rupert and McDonnell, Liz (2017) Hate crimes against trans people: assessing emotions, behaviors and attitudes towards criminal justice agencies. *Journal of Interpersonal Violence*

¹⁷ The Stonewall report (2018)

Impact of Reg 19 Local Plan Policies on Equalities Categories

Based on the methodology described above, this section assesses each proposed policy in relation to the protected characteristic group.

Table 5: EqIA screening assessment

Policy	Equalities Category						Marriage	Comments
	Race	Gender	Disability	Age	LGBT	Religion		
BSS01 – Spatial Strategy	M+	M+	M+	M+	M+	M+	O	In order to achieve the Local Plan vision, this policy sets out the spatial strategy for Barnet. As population increases, so does demand for housing, employment and infrastructure. The proposed scale of growth will address need and the provision of new homes will likely have a positive impact on all groups.
GSS01 – Delivering Sustainable Growth	M+	M+	M+	M+	M+	M+	O	This policy aims to create conditions for sustainable growth and direct growth to the most sustainable locations so could have a positive impact on all equalities groups.
GSS02 – Brent Cross Growth Area	M+	M+	M+	M+	M+	M+	O	This policy supports comprehensive regeneration of Brent Cross and promotes a mixed-use area with an integrated network of open spaces, pedestrian and cycling routes. It also requires new development to provide community infrastructure which will reinforce community cohesion. This could have a positive impact on all equalities groups.
GSS03 – Brent Cross West Growth Area	M+	M+	M+	M+	M+	M+	O	This policy promotes growth and regeneration at Brent Cross West which optimises density, infrastructure and jobs. Development will be

								directed away from major road infrastructure, particularly the North Circular Road. This could be beneficial for all equalities groups as it will encourage social inclusion through mixed use development that is well connected and accessible by public transport and active travel.
GSS04 – Cricklewood Growth Area	M+	M+	M+	M+	M+	M+	O	This policy supports regeneration and intensification, supported by high existing PTAL levels and planned transport infrastructure improvement and under used sites. Residential density and delivering improvements to amenity will also be supported. This could be beneficial for all equalities groups as it will encourage social inclusion through mixed use development that is well connected and accessible by public transport and active travel.
GSS05 – Edgware Growth Area	M+	M+	M+	M+	M+	M+	O	This policy promotes regeneration and intensification, supported by high existing PTAL levels. Residential density and delivering improvements to amenity will also be supported. This could be beneficial for all equalities groups as it will encourage social inclusion through mixed use development that is well connected and accessible by public transport and active travel.
GSS06 – Colindale Growth Area	M+	M+	H+	H+	M+	M+	O	This policy supports growth in Colindale, particularly at Colindale Station, Grahame Park Estate and the former Peel Centre. Growth will be supported by new community facilities, a new step free underground station,

								improvements to open space and public realm, in addition to new pedestrian and cycle routes. The regeneration of this area could have medium positive impacts across all equality groups, particularly those with mobility issues who will benefit from station improvements and step free access.
GSS07 – Mill Hill East	M+	M+	M+	M+	M+	M+	O	This policy seeks to deliver new housing in Mill Hill East, whilst also giving consideration to the Mill Hill Conservation Area and the Green Belt. Growth will also be supported by public transport improvements. This could be beneficial for all equalities groups as it will encourage social inclusion through mixed use development that is well connected and accessible by public transport and active travel.
GSS08 – Barnet’s District Town Centres	M+	M+	H+	H+	M+	M+	O	This policy will partially focus on providing mixed use development within town centres, which will reinforce community cohesion but also facilitate continued access to a wide range of services which will reduce the needs to travel and assist those with mobility issues.
GSS09 – Existing and Major New Transport infrastructure	M+	M+	M+	M+	M+	M+	O	This policy sets out transport infrastructure needed to deliver growth and regeneration in the Borough. This will be beneficial to all groups as it will help create more sustainable neighbourhoods with access to a range of social infrastructure. It will also help provide greater access to employment opportunities, both within the Borough and further afield which will be particularly beneficial to groups

								that have higher unemployment rates such as BAME and disability groups.
GSS10 – Estate Renewal and Infill	H+	M+	M+	M+	M+	M+	O	This policy aims to improve the quality of housing estates in the Borough which will help tackle poor quality housing and social exclusion . The policy also requires the re-provision of affordable housing units to ensure no net loss of affordable floorspace This is likely to have a positive impact across all groups, but particularly BAME groups who are more likely to experience living in poor quality housing ¹⁸ .
GSS11 – Major Thoroughfares	L+	L+	L+	L+	L+	L+	O	This policy sets criteria for development along thoroughfares and sets out criteria for transport infrastructure upgrades, which will benefit all groups in terms of increased accessibility and the delivery of new homes, however, the overall impact is likely to be low.
GSS12 – Car Parks	O	O	O	O	O	O	O	This policy supports development of and above surface level car parks. This type of development will only be supported where it can be demonstrated that parking requirements are surplus to requirement or re-provided as needed, therefore, it is unlikely to have any significant impacts on equalities groups.
GSS13 – Strategic Parks and Recreation	M+	M+	M+	M+	M+	M+	O	This policy promotes healthy active lifestyles through the provision of recreational facilities that promote physical activity and mental

¹⁸ Institute of Race Relations - Inequality, housing and employment statistics.

								wellbeing. This will have a positive effect across all groups.
Housing								
HOU01 – Affordable Housing	H+	H+	H+	H+	M+	M+	O	This policy seeks to maximise affordable housing delivery. Affordable homes are considered to provide high positive benefits to all, particularly those on lower incomes which may include the younger and older population, women, ethnic minorities and disabled people. Innovative housing products and provision of keyworker housing may widen choice for younger age groups seeking home ownership.
HOU02 – Housing Mix	H+	M+	M+	H+	M+	M+	O	This policy aims to provide a mix of dwelling types and sizes in order to provide choice for a growing and diverse population for all households in the Borough. It emphasises bed spaces and space standards in ensuring homes are well designed and spacious. This is considered to have a positive benefit across all groups, particularly young people and BAME groups who are more likely to be living in the private rented sector ¹⁹ . It also provides more options for downsizing amongst older owner occupiers.
HOU03 – Residential Conversions and Redevelopment	L+	L+	L+	L+	L+	L+	O	This policy aims to manage housing growth and protect family sized accommodation. It ensures that residential conversions do not have a detrimental impact on local areas and

¹⁹ Ethnicity, health and the private rented sector (2014) McFarlane, M.

								is considered to have a low impact on equality groups.
HOU04 - Specialist Housing	M+	M+	H+	H+	M+	M+	O	This policy sets out how specialist housing will be provided, including housing for older people, HMOs, student accommodation and shared living accommodation. This will have a positive impact upon certain protected groups and will help vulnerable groups live independently, particularly older people and young people who are more likely to live in HMOs and shared accommodation. In addition, stricter criteria for HMOs may positively impact single people, who are more likely to live in HMOs, as it ensure reasonable standards are maintained.
HOU05 – Efficient Use of Barnet’s housing Stock	M+	M+	M+	M+	M+	M+	O	This policy seeks to ensure the efficient use of Barnet’s housing stock in addressing identified housing needs, which will benefit everyone.
HOU06 – Meeting Other Housing Needs	H+	N	N	M+	O	O	O	This policy promotes increased supply of good quality homes in the private rented sector through build to rent schemes. It also promotes self-building which will widen the ability for more people to build and own their own home. This will be beneficial to most groups, but particularly BAME groups where there is a higher proportion of people in rented accommodation.
HOU07 – Gypsies, Travellers and Travelling Showpeople	O	O	O	O	O	O	O	Although it is considered that there is no identified need for gypsy and traveller accommodation, this policy makes provision for this group.

Character, Design and Heritage								
CDH01 - Promoting High Quality Design	H+	H+	H+	H+	H+	H+	O	This policy seeks to ensure high quality design in buildings and spaces in the Borough and emphasises that good design should be inclusive and accessible. Examples of features which improve accessibility include wheelchair access, step free routes, way-finding and non-slip surfaces. Those less mobile, including older and those with a physical disability will benefit particularly in this respect. It also encourages principles of secured by design to ensure safety and security for all. Therefore, this policy is considered to have a positive impact on all equalities groups.
CDH02 - Sustainable and Inclusive Design	H+	H+	H+	H+	H+	H+	O	This policy requires sustainable and inclusive design in new development across the Borough. It emphasises the need for accessible, adaptable and inclusive development that can be used safely and easily by all. This policy will benefit everyone, particularly the elderly and disabled people with reduced mobility,.
CDH03 – Public Realm	H-	H+	H+	H+	H+	L+	O	This policy encourages improvements to the public realm that will encourage increased access to and use of space. This should help to increase feelings of safety. It also promotes the healthy streets approach which will create more accessible public spaces. This policy will benefit all groups but particularly those with mobility issues and those more vulnerable in society (age, disability, gender and LGBT).

CDH 04- Tall Buildings	O	O	O	O	O	O	O	The policy identifies areas appropriate for tall buildings, this in itself is unlikely to significantly impact on protected equalities groups. Other policies contained elsewhere in the plan consider high quality design and accessibility standards that will need to be applied in the case of tall building development proposals. It is therefore considered the effects of this policy will be neutral across all groups. .
CDH05 - Extensions	O	O	O	O	O	O	O	This policy sets out criteria for extension development and will have a neutral impact on the equalities groups.
CDH06 – Basements	O	O	O	O	O	O	O	This policy sets out criteria for basement development and will have a neutral impact on the equalities groups.
CDH07 - Amenity Space and Landscaping	M+	M+	M+	M+	M+	M+	O	This policy seeks to protect the amenity and landscaping conditions for occupants of new developments and the surrounding area. It will have a positive impact on all residents, users and occupiers of buildings, including all equalities groups to promote social inclusion and wellbeing.
CDH08 – Barnet's Heritage	O	O	L-	L-	O	O	O	This policy seeks to protect designated and non-designated assets. There may be some conflict between protecting heritage assets and making alterations to improve disabled access, e.g. ramps / lifts may not be considered appropriate in some listed buildings, so the policy could be considered to have a low negative impact on disabled groups and the elderly with reduced mobility and a neutral impact on other equalities groups.

CDH09 - Advertisements	L+	L+	L+	L+	L+	L+	O	This policy sets out design requirements for advertisements. It also promotes pedestrian way finding signage which may be positive for all groups, particularly those with mobility issues (such as disabled and elderly groups).
Town Centres								
TOW01 - Vibrant Town Centres	M+	M+	M+	M+	M+	M+	O	This policy seeks to promote the vitality and viability of Barnet's town centres by managing a hierarchy of town centres, which will be a focus for convenience, business and service uses. . Increasing the accessibility to these uses will be of particular benefit to disabled and older people with reduced mobility and people with young children. By reducing the need to travel to access shopping and other services, there will be a positive impact on all groups through improved accessibility and social cohesion.
TOW02 - Development Principles in Barnet's Town Centres, Local Centres and Parades	L+	L+	L+	L+	L+	L+	O	This policy promotes a mix of uses within town centres. It will help to ensure a good mix and variety of uses and promotes active frontages on ground level. This will lead to increased activity and contribute to feelings of safety and security. However, this is dependent on a number of other factors therefore, the effect is considered to be low
TOW03 - Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan	M+	M+	M+	M+	M+	M+	O	This policy aims to resist the proliferation and over concentration of certain uses in town centres. For example, proposals for fast food takeaway will be resisted within 400m of the boundary of an existing school or youth centre. Research suggests that proximity to fast food

Shops, Pawnbrokers and Shisha Bars								outlets is one of a number of contributing factors to childhood obesity. The policy should therefore provide health benefits for young people by discouraging unhealthy eating habits. Restrictions on uses that are sometimes associated with anti-social behaviour (e.g. shisha bars) or adverse impacts on mental health (e.g. betting shops) should have a positive impact on equalities groups.
TOW04 - Night –Time Economy	M+	O	O	M+	M+	O	O	This policy supports the provision of night-time economy uses in town centres provided that there is no adverse impact associated with that use. This policy may be of greater importance to some groups such as young, BAME groups and LGBT, where there are environments that provide a safe place to meet with similar people and provide opportunities for cultural expression. Therefore, the policy may have a positive impact on these groups and a neutral effect on others.
Community Uses, Health and Wellbeing								
CHW01 – Community Infrastructure	H+	H+	H+	H+	H+	H+	L+	This policy is mostly concerned with the preservation of existing social and community uses. It promotes flexible community spaces and where development places increased demand on current facilities, new facilities and/or contributions will be required. Barnet has many meeting places, that cater for a range of faiths and beliefs. The policy seeks to support community organisations and religious groups to help them to meet their need for

								multi-purpose facilities. For many, local community centres and cultural centres are the main source of support, particularly for people from BAME groups and elderly people. These centres support social activity and provide help and advice. Overall, it is anticipated that this policy will have a positive impact on all equality groups.
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CHW02 – Promoting health and wellbeing	H+	H+	H+	H+	H+	H+	L+	Health inequalities exist within the Borough based on location, gender and deprivation. For example, Women in Barnet have a significantly higher life expectancy than men. However, the overall life expectancy of people living in the most deprived wards in Barnet is on average 7.6 years less for men and 7.9 years less for women, compared to more affluent areas. This policy seeks to improve the health and wellbeing of Barnet’s population, and the reduction of health inequalities. It ensures adequate provision of health and social care infrastructure and promotes healthier neighbourhoods. It also ensures that vulnerable residents benefit from housing choice and supports the remodelling of residential care homes. This policy will naturally benefit groups with higher health-related needs such as older people, BAME groups and those with a mental/physical disability. however, the policy will have positive impacts across all equality groups.
CHW03 - Making Barnet a safer place	H+	H+	H+	H+	H+	H+	O	This policy seeks to improve safety within the Borough through effective partnership working and through the design of the built environment. Men are at most risk from violent crime, particularly ‘stranger violence’ which is likely to occur in public places. In addition, the policy will also benefit those who suffer from fear of crime and violence i.e. women, the frail, elderly and the disabled and groups

								traditionally targeted for hate crime, i.e. those in the LGBT community or from ethnic and faith minority backgrounds.
CHW04 – Protecting Public Houses	L+	L+	L+	L+	L+	O	O	This policy is concerned with the preservation and protection of public houses which can be an important cultural assets for communities .and play an important role in community cohesion. This policy is considered to have a positive impact on most equality groups. This is of greater importance for some groups, i.e. the young or old, ethnic groups (but predominantly white British) and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some BAME groups, public houses are not part of their lifestyle or cultural tradition and therefore, this policy will have a neutral effect on these groups.
Economy								
ECY01 - A Vibrant Local Economy	M+	M+	M+	M+	M+	O	O	This policy seeks to protect and promote new employment opportunities, which will sustain the economic and social well-being of a community. The policy sets out to provide opportunities to create diverse full-time and part-time employment. This policy should be positive in terms of equalities impact, for example, working close to home will be beneficial to those with caring responsibilities or part-time workers – often women or those with mobility issues that might make travel more difficult.

ECY02 - Affordable Workspace	H+	M+	M+	M+	M+	O	O	This policy promotes economic diversity and supports existing and new business development in Barnet which will help sustain economic and social wellbeing of a community. The provision of small affordable workspace may be beneficial to BAME groups, for whom small businesses are a traditional way out of unemployment. This could also provide opportunity for the voluntary sector who could contribute to community cohesion or seek to address issues of inequality in the area.
ECY03 - Local Jobs, Skills and Training	H+	H+	H+	H+	H+	H+	O	This policy aims to increase local employment opportunities across the Borough through the provision of apprenticeships, work experience, jobs brokerage and skills training and the use of local labour and/or supplies. This will have a positive impact across all equality groups, particularly young people and BAME groups.
Environment and Climate Change								
ECC01 – Mitigating Climate Change	L+	L+	L+	L+	L+	L+	O	The policy sets out design requirements for development to adapt to climate change. Climate change affects social and environmental determinants of health (e.g. clean air and clean drinking water). Therefore, this policy may have a positive impact on all groups, but particularly vulnerable groups such as the elderly, disabled, young and pregnancy and maternity who may be more susceptible to health conditions

ECC02 - Environmental Considerations	L+	L+	M+	L+	L+	L+	O	The policy seeks to mitigate against the impact of development on air, noise and water quality. Long term exposure to air pollutants is linked to cancer, heart disease, reduced lung function and respiratory disease and disproportionately affects more vulnerable groups. The policy has particular benefits for young and elderly people and pregnant women who have been identified as particularly sensitive to health problems caused by air pollution.
ECC02 A- Water Management	L+	L+	L+	L+	L+	L+	O	This policy is intended to protect the Boroughs water resources and ensure against flood risk. This will contribute towards wider climate change objectives which will have a positive impact on all groups.
ECC03 – Dealing with Waste	L+	L+	L+	L+	L+	L+	O	This policy requires management of waste and ensures adequate refuse and recycling storage space and facilities that enables easy collection and is accessible to all residents within a development. . It is therefore not considered to have negative or disproportionate impact on equalities groups.
ECC04 – Barnet’s Parks and Open Spaces	M+	M+	L+	M+	M+	M+	O	This policy seeks to maximise the benefits of open space in Barnet and improve green infrastructure. It will have a beneficial impact on all residents in terms of physical and mental wellbeing, including all equalities groups. Potential access difficulties to some parks and open spaces mean that impacts have been rated as low (positive) for disabled groups and medium (positive) for other equalities groups.

ECC05 - Green Belt and Metropolitan Open Land	O	O	O	O	O	O	O	This policy seeks to protect the Borough's Green Belt and MOL. It is not considered to have significant effects on equalities groups.
ECC06 - Biodiversity	O	L+	O	L+	O	O	O	This policy seeks to protect and enhance the Borough's biodiversity. This may improve air quality in the longer term which may have a positive effect on elderly, young people and pregnant women but a neutral effect on other groups.
Transport and Communications								
TRC01 – Sustainable and Active Travel	H+	H+	H+	H+	M+	M+	O	This policy promotes a more sustainable travel network that reduces car dependency. This policy is likely to have a positive impact on women, younger people and older people who, statistically, are the groups that are most likely to rely on public transport rather than having access to a private car. Disabled people with reduced mobility would also benefit from improved accessibility. The policy is considered to have a medium positive impact on all groups.
TRC02 – Transport Infrastructure	M+	H+	H+	H+	M+	M+	O	This policy promotes the delivery of new transport infrastructure to support the travel needs of a growing population. It sets out requirements for step free access in train stations across the Borough which will benefit those with mobility issues such as disabled people, elderly people and those with pushchairs. In addition, the enhancement of public transport, particularly in areas that are less accessible, will offer more people

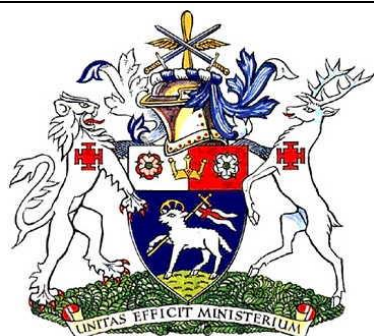
								affordable and alternative transport opportunities away from cars to travel across the borough and into central London, and contribute to London as a great place to live, work and visit.
TRC03 – Parking Management	L+	L+	M+	L+	L+	L+	O	This policy sets out the Council’s parking standards. Consideration is given to the need for disabled parking provision so the policy is considered to have a medium positive impact on disabled people and a low positive impact on other equalities groups.
TRC04 – Digital Communication and Connectivity	M+	M+	M+	M+	M+	M+	O	The policy sets out how development should provide communication and utilities infrastructure and will have a low medium on the equalities groups. Positioning of CCTV is protected to ensure the safety and security of the area is maintained. Digital connectivity can also enhance social inclusion for all groups.

Conclusion:

58. The EqIA identified that many of the policies would have a positive effect across equalities groups particularly those which relate to housing (e.g. the provision of affordable housing and specialist housing), high quality design (e.g. emphasis on inclusive design will be beneficial to disabled people), employment and training and improvements within the built environment to make it more inclusive. However, the EqIA did note that there is potential for conflict protecting heritage assets and making alterations to improve disabled access, e.g. ramps / lifts may not be considered appropriate in some listed buildings.

Policy and Resources Committee

16 June 2021



Title	West Hendon Playing Fields – Outline Business Case
Report of	Chairman of the Policy and Resources Committee
Wards	West Hendon
Status	Public
Urgent	No
Key	Non-key
Enclosures	<p><i>Appendix A: Outline Business Case – West Hendon Playing Fields</i></p> <p><i>Appendix B: West Hendon Playing Fields Masterplan (Site Plan)</i></p> <p><i>Appendix C: West Hendon Playing Fields (Feasibility Study)</i></p>
Officer Contact Details	<p>Cassie Bridger, Assistant Director: Greenspaces & Leisure Cassie.Bridger@barnet.gov.uk</p> <p>Matthew Waters, Assistant Director: Capital Delivery Matthew.Waters@barnet.gov.uk</p>

Summary

In March 2018, the Council commissioned the Sport, Leisure and Culture Consultancy (SLC) to support with the production of a masterplan and feasibility study for West Hendon Playing Fields (WHPF) which focused on the development of a strategic sports hub with a wider leisure and community offer.

The study was completed in February 2019 and included extensive public and stakeholder consultation with 72% of respondents in support of the masterplan. The feasibility report, along with the final plan was presented to Environment Committee on the 12th March 2020.

At this stage, Environment Committee unanimously approved the plan for the site and agreed to proceed with producing an Outline Business Case which would be reported to a future Theme Committee as appropriate.

The key outputs of the masterplan and feasibility study (Appendix B and Appendix C respectively) included:

- An Options Appraisal which explored potential facility development options supported by evidence from desktop analysis and research and consultation with a range of key stakeholders.
- A subsequent site masterplan and concept designs to RIBA Stage 2 showing the development of identified options including consideration of the impact upon ecology and wildlife and an exploration of flood risk.
- An accompanying feasibility study which provided details of the development costs, high-level business plans to inform the future revenue position and an outline plan for the implementation of the masterplan.
- An appraisal of potential future management model options informed by consultation with selected key stakeholders.

In consideration of the Covid-19 pandemic and with the potential risk of changes to the sport and leisure market, the Council recommissioned SLC in November 2020 to assist with a more detailed financial analysis of the original business plan and a further review of the capital cost estimates provided in the 2018/19 feasibility report.

This assessment confirmed that there are no significant changes based on the original capital cost and business plan estimates. This detail is expanded within the Outline Business Case at Appendix A, which indicates the total estimated cost of delivering the West Hendon Playing Fields Masterplan (including professional fees) is approximately £18.8m. Given the delivery timescales and assumed sector recovery by 2023/24, the potential annual revenue to be generated from this scheme remains up to £360,000 per annum and is still based on a third-party management model. The Outline Business Case (Section 7) includes detailed financial modelling and a sensitivity analysis which highlights the impact of borrowing on the scheme and the requirement for combination of CIL monies / external funding to maintain viability.

The Outline Business Case also refers to two key interdependent workstreams; capital delivery (design and build) and transformation (management model) which are critical in the successful delivery of the project and include a series of tasks to be progressed in the next stage which focus on (but are not limited to);

- Design Development (progressing design material from RIBA Stage 2 to RIBA Stage 4).
- Appointment of professional and technical services.
- Communication and Engagement (including stakeholder, statutory and resident)
- Site investigations and surveys.
- Production of a Planning Application for the site.
- Pre-procurement activity
- Development of a Procurement Strategy (construction and management model)
- Specification and Contract Development (management model).

Policy & Resources Committee are therefore requested to approve the Outline Business Case for West Hendon Playing Fields which sets out a vision for improved and enhanced greenspace, for which a series of community, social, educational, economic and health benefits can be derived for residents.

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Officers Recommendations

- 1. Policy and Resources Committee approve the Outline Business Case (OBC) for the West Hendon Playing Fields Masterplan.**
- 2. Policy and Resources Committee note the funding strategy outlined within the Outline Business Case (Section 7) and approves £18.8m capital funding, which includes the associated professional fees to deliver the West Hendon Playing Fields Masterplan.**
- 3. Policy & Resources Committee note the associated delivery timetable set out in Appendix A, Section 8 of the Outline Business Case which includes the submission of a Planning Application.**
- 4. Policy & Resources Committee delegates authority to the Executive Director for Environment to commence the procurement workstreams for both construction and operator.**

1. WHY THIS REPORT IS NEEDED

BACKGROUND

- 1.1** In recent years the Council has developed a series of key strategic documents designed to shape the delivery of sport and physical activity and facilities in parks and open spaces across the Borough. These include a Parks and Open Spaces Strategy (2016-2026). Playing Pitch Strategy (2017), Fit and Active Barnet Framework (2016-2022) and an Indoor Sport and Recreation Study (2018).
- 1.2** A key recommendation within the Parks and Open Spaces Strategy and Playing Pitch Strategy focused on the creation of three strategic sports hubs located in the north (Barnet Playing Fields/ King George V), centre (Cophall Playing Fields and Mill Hill Open Spaces) and the west/south of the Borough (West Hendon Playing Fields). These sites were specifically identified as opportunities to meet existing sporting use and support demand generated through growth.

MASTERPLAN DEVELOPMENT

- 1.3** In March 2018, the Council commissioned the Sport, Leisure and Culture Consultancy (SLC) to support with the development of a masterplan and feasibility study for the development of a strategic sports hub with a wider leisure and community offer at West Hendon Playing Fields.
- 1.4** As part of developing a future facility mix, the Council in partnership with SLC undertook an extensive engagement with a range of stakeholders to fully understand the challenges and constraints of the existing site and to explore potential opportunities for the provision of new and improved facilities through the development of a masterplan for WHPF.

- 1.5 This engagement process was supplemented by a supply and demand assessment to explore the market potential for a range of additional, complementary potential developments based on local demographics and the supply of competing facilities.
- 1.6 The initial stakeholder engagement and results of the supply and demand assessment informed the development of a long list of facility options which were then presented to wider stakeholders, including the general public, through an online questionnaire issued through the Council's Engage Barnet webpage. This stage of and stakeholder consultation received approximately 900 responses of which 72% were in support/ strong support of the scheme.
- 1.7 As a result, the final facilities mix agreed for West Hendon Playing Fields is;
- Brand new Sports Hub facility including (but not limited to):
 - Café
 - Multi-use community rooms
 - Open plan office area for community sports hub
 - Clip and climb indoor climbing area
 - Multiuse activities studio
 - New nursery area
 - Soft play area
 - Changing rooms and toilets
 - Improved and reconfigured football pitches
 - 3G Artificial Turf Pitches (ATPs)
 - Multi Use Games Area (MUGA)
 - Tennis Courts
 - Wheeled Sports Facility
 - Bowling Green
 - Adventurous Play and Toddler Play
 - Outdoor Gym and Trim Trail
 - Adventure Golf
 - High Ropes
 - Woodland Nature Trail
 - Sensory Garden and Community Garden
 - Pedestrian and Cycle Routes
- 1.8 The facilities mix referred to above, endorsed through consultation is considered to provide a range of accessible indoor and outdoor facilities and commercial elements to support the business plan. It also provides a significant opportunity to meet the demand of individuals and organised sports within the community.
- 1.9 Having identified and prioritised facility mix for future development at WHPF, further masterplanning progress commenced throughout 2019/20 which included;
- Development of accommodation schedules for built infrastructure
 - Ecological assessment and flood risk assessment to inform masterplanning
 - Concept designs for built infrastructure and sketch masterplans
 - Budget estimates on development costs
 - Programme of use and high-level business plans to inform projected revenue

- Consultation with Planning and Highways on sketch masterplans
 - Outline development timeline
 - Identification of potential funding options and partners
 - Formal consultation on draft masterplans.
 - Progress with Phase 3: Appraisal of options for future management model
 - Identification of potential operating models including case studies of comparable sites
 - Consultation with selected stakeholders on identified operating models
 - Soft market testing (where appropriate) with potential operators.
- 1.10 The study was completed in February 2019 and at this stage indicated a capital cost estimate of circa £17.7m to deliver the scheme, with an approximate annual surplus of up to £360,000 (excluding any borrowing arrangements).
- 1.11 The Feasibility Study (Appendix C), along with the final proposed masterplan (Appendix B) was presented to Environment Committee on 12 March 2020. At this stage, Environment Committee unanimously approved the plan for the site and provided agreement to proceed with producing an Outline Business Case which would be reported to a future Theme Committee as appropriate.

OUTLINE BUSINESS CASE DEVELOPMENT

- 1.12 Following Committee approval, throughout 2020/21 officers have been progressing the development of an Outline Business Case. This has included a review of the following;
- Noting the findings of the masterplan and feasibility study and considering the requirements to the scheme forward to the next stages of design (from RIBA Stage 2 to up to RIBA Stage 4).
 - A review of the procurement and delivery options for construction considering developing a Procurement Strategy.
 - Further analysis of the the 10-year Business Plan produced as part of the Feasibility Study and considering any impact brought about by Covid-19.
 - A review and development of a financial model that sets out the net financial position including capital costs and funding, lifecycle costs, equipment replacement provisions, estimates of income and the net operational position for a range of model scenarios
 - Pre-Procurement activity required to support the development of a Procurement Strategy (for suitable site management).
 - Review of construction and procurement risks and issues associated with delivering the Project.
 - Produce a draft consultation and engagement plan, identifying the requirements to engage with statutory planning consultees e.g. Canal and River Trust, Environment Agency, to fully understand the potential constraints of development linked to the Welsh Harp, SSSI and Local Nature Reserve.
 - Development of an outline funding strategy to explore options for delivery of the proposed masterplan.
 - Continued engagement with external stakeholders such as Sport England and the Football Foundation to assess the potential of submitting a funding application to support the development of specific facilities within the scheme.

- Resource requirements (including professional services) in order to successfully deliver the scheme.
 - A programme timetable to deliver the scheme and the key milestones which will need to be achieved.
 - Confirming the Project Outcomes and Project Objectives in delivering the scheme.
- 1.13 In further appraising of the above, in November 2020 the Council recommissioned SLC to assist with a more detailed financial analysis of the original business plan and a further review of the capital cost estimates provided in the 2018/19 feasibility report. The detail of this is expanded on in Section 5 of this report and Section 7 in the Outline Business Case.
- 1.14 The key summary headlines from this update concluded;
- The expected scheme capital cost is estimated to be £16.6m, representing a decrease from the original feasibility cost estimate.
 - Additional costs (e.g. resourcing, professional fees, legal) is estimated at £2.2m, which represents a total project cost of £18.8m
 - Income generated through facility hire and bookings could generate up to £1.4m a year.
 - At business plan maturity (Year 2), an annual surplus of between £161k to £361k could be generated (dependant on the management contract risk share profile).
 - This income could be used to support Greenspaces MTFS savings / the Councils General Fund / reinvestment back into Greenspaces.
 - The projected account information for maintenance, sinking fund, operator overheads and profit has been reviewed.
 - Based on assumptions, this could represent a potential revenue benefit of circa £611k per year
 - The surplus does not account for borrowing and MRP; the full OBC document includes detailed financial modelling which outlines the impact of borrowing on the scheme and the requirement for combination of CIL monies / external funding to maintain viability.
- 1.15 Given the significant community, social, environmental and economic benefit, Policy and Resources Committee are requested to endorse and approve the Outline Business Case for West Hendon Playing Fields.

2. REASONS FOR RECOMMENDATIONS

- 2.1 West Hendon Playing Fields is an important and reasonably well used sporting, recreation and community resource with strong links to adjacent areas of significant ecological interest. The site currently provides a series of outdoor and indoor facilities to support existing sports clubs.
- 2.2 The playing fields and wider site has strong ecological interest being located adjacent to the Welsh Harp / Brent Reservoir, a designated Local Nature Reserve and Site of Importance for Nature Conservation. The site also forms a buffer zone to the Welsh Harp which is also a designated Site of Special Scientific Interest (SSSI), providing a vital habitat for wildlife.

- 2.3 The current site is unwelcoming and is characterised by rundown built infrastructure, poor quality facilities, poor access and circulation routes and an overarching lack of identity. It is made up of a series of unconnected functions operating in isolation and with an apparent lack of site overall management. This has resulted in a disparate, disjointed and incoherent offer.
- 2.4 Despite the weaknesses of the current site, there are clear opportunities to develop facilities and services which not only meet local need for improved sports and community facilities but exploit the unique nature and location of the site, particularly linked to its SSSI designation. As well as developing a new sports hub and community facilities for residents, there is a clear opportunity to improve basic pedestrian and cycle route connections to and around the wider site. Thus, creating an exciting sport and community destination for residents which can support achieving improved health, social, community, educational, economic and environmental outcomes.
- 2.5 The scheme forms a core placemaking element of the wider regeneration of West Hendon which has seen development of 2000 new private and affordable homes. It will provide a valuable asset for use by local communities, generate new employment and volunteering opportunities and act as a much-needed positive addition to the area.
- 2.6 The masterplan aligns strongly with a number of Council strategies including the Fit and Active Barnet Framework, the Parks and Open Spaces Strategy, the Playing Pitch Strategy and the Joint Health and Wellbeing Strategy. It has been subject to extensive consultation and engagement with over 900 users, wider stakeholders and local residents with almost three-quarters being either supportive or very supportive of the overall development.
- 2.7 The scheme will help to meet the specific needs of local sports clubs for grass football pitches (particularly junior pitches) and Artificial Turf Pitches as identified in the Council's Playing Pitch Strategy. It will also provide local demand for free to access activities and facilities including a wheeled sports facility (skateboarding, scootering and BMX),
- 2.8 Further benefits will provide improved indoor facilities for existing users including the bowls club, nursery and martial arts club, additional community meeting space and additional indoor activities such as softplay and climbing, providing more opportunities for local children and young people to be physically active.
- 2.9 The masterplan will capitalise upon the unique ecological interest of WHPF and the Welsh Harp and its designation as a Site of Special Scientific Interest (SSSI) by widening awareness through education and interpretation and by improving access to enable more people to learn about this important natural asset.
- 2.10 The proposed developments will revitalise the site providing valuable and much needed open space, enriching opportunities for local residents and communities and optimising its use through investment and providing a significant social return.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 In March 2016, Environment Committee approved the Parks and Open Spaces Strategy. An agreed action was to “create new Sports Hubs with good quality facilities”, where a number of sites were subsequently identified.
- 3.2 At the meeting of the Environment Committee on 13 July 2017 it was agreed that:
- “Masterplans would be developed for both West Hendon Playing Fields and Barnet Playing Fields to create a Sports Hub. Blended funding streams would be pursued for the development of these Sports Hubs in line with the agreed Greenspaces Capital Investment Programme and the Playing Pitch Strategy (2017) for Barnet.”
- 3.3 Alongside this, Authority would be delegated to the ‘Strategic Director for Environment’ to procure appropriately qualified external support to develop the Masterplans for the sites in accordance with the Council’s Contract Procedure Rules.

4. POST DECISION IMPLEMENTATION

- 4.1 Subject to Committee approval of the Outline Business Case, it is assumed that a WHPF Project Board will be established. The responsibility of this Board will be to provide leadership of the project, working with appointed consultants to deliver.
- 4.2 In February 2021, £1.4m was secured from the Community Infrastructure Levy administration fund via a decision made by Policy and Resources Committee. This initial budget will enable progress of the following;
- Develop the design produced as part of SLC’s feasibility study, including architectural, landscaping and engineering design consultancy
 - Develop project budget through cost estimates and valuation exercises
 - Undertake market testing to establish approach to contractor and operator appointments
 - Undertake further stakeholder engagement and develop site knowledge through required surveys and reports
 - Finalise internal resourcing requirements to support programme, including governance arrangements and staffing appointments where necessary
 - Develop documentation required and apply for outline planning permission to develop the site
 - Develop tender documentation and engage with procurement to prepare for appointments of contractors following finalisation of approach
- 4.3 The above activity will support in delivering against the current high-level programme timetable:

Table 1

Outline Business Case reported and approved	June 2021
Internal resources and governance arrangements finalised	July 2021
First technical appointments made	July 2021
Completion of site surveys and reports	October 2021
Developed design complete (RIBA 3)	March 2022
Outline planning application submitted	July 2022

Contractor procurement exercise undertaken	September 2022
Full business case approved	November 2022
Technical designs complete (RIBA 4)	January 2023
Approval of reserved matters	March 2023
Phased construction - start on site (RIBA 5)	June 2023
Leisure operator procurement complete	July 2023
Phased construction completes	Summer 2025
Leisure operator - mobilisation (RIBA 6)	Summer 2025

- 4.4 Where relevant, further reports will be provided back to Policy and Resources Committee to provide an update on progress and consideration of any decisions required.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 The project supports the wider strategy of the local authority and the upcoming Barnet Plan, and its four main priorities, in the following ways:

Clean, safe and well-run

- a place where our streets are clean and anti-social behaviour is dealt with so our residents feel safe; providing good-quality, customer-friendly services in all that we do
- improvements to the quality of parks infrastructure
- operational arrangements introduced to a site to ensure security, safety, maintenance and longevity
- ecological improvements to a Site of Special Scientific Interest, increasing awareness of the natural environment

Family friendly

- creating a family friendly Barnet, enabling opportunities for our children and our young people to achieve their best an informed and well-researched facility mix which caters for all age groups and considers all stakeholders
- improved offer for younger people, including improved junior pitches and new, accessible community facilities

Healthy

- a place with fantastic facilities for all ages, enabling people to live happy and healthy lives development of facilities to promote healthy and active lifestyles among residents
- inclusion of free-to-access facilities alongside more specialist options, to provide a unique offer to local residents
- improvement to community facilities

Thriving

- a place fit for the future, where all residents, business and visitors benefit from improved, sustainable infrastructure and opportunity
- Improvements to cycle and pedestrian routes through the park, increasing Barnet's offer in terms of active travel
- A significant placemaking contribution to the wider West Hendon regeneration works

- Improvement to facilities for existing local businesses

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

FINANCE

- 5.2.1 The original capital cost estimate developed by cost consultants, Castons and SLC was developed approximately two years ago. It was based upon a delivery programme which, at the time used a provisional timetable commencing in 2019.
- 5.2.2 In November 2020, the Council recommissioned SLC to assist with a more detailed financial analysis of the original business plan and a further review of the capital cost estimates provided in the 2018/19 feasibility report.
- 5.2.3 The key outputs of this assessment, to which the detail is expanded in Section 7 of the Outline Business Case were to:
- Develop a financial model that sets out the net financial position including capital costs and funding, lifecycle costs, equipment replacement provisions, estimates of income and the net operational position for a range of model scenarios
 - To understand the level of investment and the financial viability of modelled options, in terms of capital, revenue, Internal Rate of Return (IRR) and overall cashflow against each scenario
 - To consider the level and timing of capital receipts / funding or external finance that can be used to finance the capital investment
 - A model to include an assessment of expenditure which is likely to influence the terms of any future lease negotiation and / or asset transfer arrangement.
 - Provide a headline summary of procurement options available (construction and operational), identifying where there are any opportunities / associated risks
 - Undertake a key risk assessment for each of the options linked to the sustainability of each option including (as a minimum):
 - Provide a cost estimate of the Social Return on Investment based on associated capital expenditure
 - Provide an outline of non-financial benefits associated within the scheme and where relevant indicate approximate value
 - Summary conclusion of the appropriate financial / funding strategy for scheme which achieves the optimum best value (finance and outcomes)
 - Produce a Draft Report for consideration by officers which draws together all elements of the work which provides an update to the outline business case.
- 5.2.4 The total budget cost estimate of delivering the masterplan for WHPF, developed by Castons in December 2018, was £17.7M (including an inflation allowance). The Castons revised total development cost estimate totals £16.62M which includes a lower inflation allowance, based on a mid-point of construction of 2nd quarter 2024. Both estimates use the same base date of December 2018.

5.2.5 The estimate of inflation has based on the Building Cost Information Service (BCIS) predictions. These are produced by the Royal Institute of Chartered Surveyors (RICS). Castons also provided a professional view of these predictions based on experience of recent the budget cost estimate on the basis of one building contract awarded to a single contractor. Further clarification on the cost of inflation will be included within the Full Business Case for the project.

5.2.6 It is possible that some phases of the contract could be completed earlier and handed over to the Council as the project progresses, this will be subject to an ongoing review of the project. In the event this materialises, this option will incur some additional preliminaries costs by the contractor and an allowance for this phasing has therefore been included in the budget cost estimate.

5.2.7 The high-level business plan developed by SLC as part of the feasibility study on the masterplan for WHPF has been reviewed and developed in more detail to inform the outline business case.

5.2.8 The key changes to the business plan include:

- Extending the business plan to cover a 30 and 50-year period (previous version was 10 years)
- More detailed development of projected expenditure (previous business plan was based on high level assumptions regarding expenditure associated with the different facility developments)
- Updating the 'yields' (prices) associated with income generation of the different facility developments on the basis that two years has passed since the original business plans were developed
- Including lifecycle replacement costs (or sinking fund) as an additional 'below the line' cost
- Removing inflation consistent with the approach used within the financial model (described in Section 3)
- Sensitivity analysis to demonstrate the financial implications of under/over performance.

5.2.9 The original business plans were developed prior to the current Covid-19 pandemic which has subsequently had a significant negative impact upon the leisure industry. However, given the timeframe for delivery of the scheme (all facilities open to the community in 2024/25), it is assumed that the pandemic will have ceased and normal trading of leisure operations will have been restored in accordance with pre-Covid conditions. The revised business plan therefore reflects this assumed position which is assumed to generate up to an optimum level of £360,000 per annum.

5.2.10 An annual summary of the revised business plan in steady state (from year 3) is shown in Section 7 within Appendix A.

FUNDING STRATEGY

5.2.11 As part of developing the Outline Business Case, the Council has assessed a range of financing options to understand the financial viability of each option over a 30 and 50-year period. There are 8 options which are modelled within the sensitivity analysis

which look at funding arrangements through prudential borrowing, community infrastructure levy (CIL), Section 106 and external grant monies.

5.2.12 Each of these options have been modelled under the baseline, under and over performance business plan scenarios to assess their financial viability based on the following assumptions:

- Prudential Works Loan Board (PWLB) maturity loan at 1.5% fixed for the term of 30 and 50 years
- Minimum Revenue Provision (MRP) at 2% fixed, based on loan terms of 30 or 50 years
- Net Present Value (NPV) factor of 3.5%
- No inflation applied to the business plan
- Full lifecycle and replacement costs funded through a sinking fund allocation in the business plan.

Model Description		100% Prudential	100% Prudential	100% S106/CIL	100% S106/CIL	50% Prud/50% S106/CIL	50% Prud/50% S106/CIL	65% Prud/35% S106/CIL	65% Prud/35% S106/CIL
Loan Period		30 Years	50 Years	30 Years	50 Years	30 Years	50 Years	30 Years	50 Years
		£m	£m	£m	£m	£m	£m	£m	£m
Net Revenue Expenditure/(Income) before MRP	A	3.25	5.01	(4.23)	(7.46)	(0.49)	(1.22)	0.63	0.65
Net Revenue Expenditure/(Income) including MRP	B	19.87	21.63	(4.23)	(7.46)	7.82	7.09	11.44	11.45
Net Revenue Expenditure/(Income) NPV	C	12.39	10.45	(2.38)	(3.20)	5.01	3.62	7.22	5.67

5.2.13 Sensitivity modelling was based on the adjustments to and other variable factors such interest and expenditure can be adjusted within the modelling. It is proposed that as the project progresses (e.g. throughout the pre-procurement and procurement phases) this is closely monitored at project Gateway stages.

5.2.14 The conclusions of this modelling indicate a requirement to obtain a combination of CIL monies and external grant funding to maintain the viability of the business case. Even in a mixed model, the cost of prudential borrowing and inclusion of MRP will prove to be prohibitive.

5.2.15 The updated financial appraisal information was presented to Capital Strategy Board (CSB) in January 2021, alongside updated capital cost estimates and business plan detail with a request of c£1.4m of CIL monies to enable further development of the Outline Business Case.

5.2.16 This submission was approved and thus included within the capital programme and reported to Policy & Resources Committee (February 2021).

PROCUREMENT – MANAGEMENT MODEL

5.2.17 As part of the original feasibility study an appraisal of the management model options for the operation of the facilities proposed for WHPF was considered. These options included:

- Direct delivery by the Council (in-house)
- Outsourced delivery through procurement of a single external operator
- Outsourced delivery through procurement of multiple external operators
- Asset transfer to a charitable trust
- Asset transfer to a Community Sports Association.

5.2.18 The appraisal included an evaluation of each management model option against an agreed set of financial and non-financial criteria and identified the two outsourcing options - procurement of a single operator or multiple external operator(s) - as being the clear preferred options.

5.2.19 Either of option is likely to be based on a management contract, supported by a detailed services specification which links directly to the Council's strategic priorities and contributes strongly to its strategic outcomes.

5.2.20 Given the projected timeframes for delivery of the scheme, it is assumed that the current Covid-19 pandemic will have ceased and that normal trading of park/leisure operations will have been restored in accordance with pre-Covid conditions. It is also assumed that the external operator market will have recovered to pre-Covid levels of activity.

5.2.21 These are key risks which are identified within the Outline Business Case, and important aspect of the transformation (management model) workstream will need to re-engage with the operator market as part of determining the final appropriate management option.

5.2.22 In considering options for the future management of facilities the project will need to ensure a strong and sustainable revenue position and the delivery of high-quality facilities, this will be tested through pre-procurement activity including any opportunities for engagement related to design development.

5.2.23 The indicative issues which have been identified for a single management operation and multi-site operation are captured in full in Section 4 of the OBC.

5.2.24 It assumed that any future contract (opposed to long-lease of the site) provides the Council with an opportunity to safeguard and maintain overall influence of the site, working alongside a partner to create and establish an identity for the site which optimises use and attracts a range of audiences.

5.2.25 Through the establishment of a contract, it is considered that the Council would be able to design more appropriate terms that enable effective and proactive management of performance. Other requirements could be included, for example the majority of potential suppliers are used to providing sport/ community development as part of 'leisure' services contracts.

5.2.26 Through pre-procurement, the Council will seek to further identify an appropriate length of contract, tasks will include;

- Review of information collated within the Feasibility Study/Financial Appraisal and update where necessary.

- Review of similar park/leisure type destinations and the existing arrangements.
- Engagement with provider market, collate information on management model(s) for consideration.
- Contract duration, commercial, contract management, performance monitoring, associated outcomes.
- Produce conclusion summary of findings to be incorporated into Procurement Strategy.

5.2.27 Project outputs will be refined as the programme develops and confirmed at the end of the Pre-Procurement stage. The proposed draft characteristics identified below will form the basis of key requirements in delivery of securing a provider for the site:

- The ability to deliver a minimum income to the Council of £161k pa (dependent on exclusions this may increase to threshold of £360kpa – to be tested during Soft Market Testing).
- A demonstrable track record of efficient and effective operations management of park / leisure facilities.
- Willing to work as a genuine partner to the Council.
- The capability to demonstrate and implement new innovations, making WHPF an attractive destination to visit for sporting and community, conservation activities.
- The capability and aspiration of the Council to deliver a range of outcomes which support; health, education, social, community, environment.
- The ability to be flexible and evolve within the contract duration to meet any sector changes

PROCUREMENT – DESIGN & BUILD

5.2.28 As part of the capital delivery workstream, the project will assess the feasibility of engaging with its strategic construction partner to explore any opportunities, where appropriate and in line with Council Procurement Regulations in supporting the delivery requirements of the WHPF scheme.

5.2.29 The Council has been in dialogue with the Football Foundation (FF) for approximately 24 months to bring forward an application to the FF of circa £1m to support the implementation of two brand new floodlit Aesthetic Turf Pitches. If successful, the Council will be required to utilise the FF framework to access the market and deliver construction.

5.2.30 It is therefore proposed that as part of assessing the design and build procurement, the Project Team explore opportunities within the contractor market alongside consulting with the Football Foundation.

5.2.31 The alignment of the design and build workstream is also critical to the success of the project; to ensure that an operator has the earliest opportunity to influence design, mobilise services and avoid any un-necessary delays which could result in LAD's.

5.2.32 A key element for both the design and build and service contract(s) is how the Council can extract greater community value, aside from the actual requirements of the contract. This includes things, such as the creation of apprenticeships, employing

local people, using local suppliers for equipment and maintenance, raising awareness of the benefits of leisure and exercise.

5.2.33 The Project is already engaging with the Town Centre and Employment and Skills Team to identify connecting opportunities.

5.2.34 Developing social value criteria will form a key component during the specification design phase.

5.2.35 A Procurement Strategy for both the construction and operator procurement workstreams will be developed and confirmed as the project progresses, with the key objective in achieving quality and value.

STAFFING

5.2.36 The Project will be governed through the establishment a West Hendon Playing Fields (WHPF) Board, which will include representation from across the Council.

5.2.37 The WHPF Board will provide strategic oversight, regular monitoring of project progress and where decisions / escalations are required report as appropriate.

5.3 Legal and Constitutional References

5.3.1 Local authorities have several different statutory powers in relation to parks and open spaces, including the Public Health Act 1875 (as amended by the Local Government Act 1972) which gave local authorities discretionary power to purchase and maintain public walks or pleasure grounds and the Local Government (Miscellaneous Provisions) Act 1976, which gives wide powers to provide recreational facilities. The Open Spaces Act 1906 provides that local authorities may acquire and hold and administer open space in trust to allow the enjoyment of it by the public and shall maintain and keep the open space in a good and decent state.

5.3.2 The Council's Constitution, Article 7 sets out the terms of reference of the Policy and Resources Committee including: To be responsible for: strategic policy, finance and corporate risk management including recommending: Capital and Revenue Budget; Medium Term Financial Strategy and Corporate Plan to Full Council; Strategic Partnerships. The Committee is responsible for those matters not specifically allocated to any other committee affecting the affairs of the Council. Whilst Environment Committee have previously received and made decisions; the subject matter of the report arguably straddles 3 other committee and consequently it is appropriate for Policy and Resources Committee to consider this report, OBC and masterplan.

5.3.3 Significant proportions of the site is designated as either Green Belt or Metropolitan Open Land. The future development of the proposals included in the final master plan will need to fully comply with the requirements arising from those designations. Any disposal by way of letting or other of the playing field will need to be advertised and any representations given proper consideration before the Council can determine whether it is appropriate to proceed with any letting. Any development will also need to be subject to planning.

5.4 Insight

5.4.1 Please refer to Appendix C (Feasibility Study) which details the extent of information gathered and the insight used to develop and inform proposal.

5.5 Social Value

5.5.1 In addition to the core financial data associated with the development of the masterplan for WHPF, it is critical that the overall business case takes account of the non-financial benefits of the scheme in order to fully assess value for money.

5.5.2 As part of the development of the Outline Business Case, '4Global Sport' were commissioned to undertake analysis on the likely Social Value that the WHPF scheme would generate. The statistics have been based on the site reaching its full maturity, which is assumed to be after 2 years, in line with the industry average.

5.5.3 4Global's Social Value Calculator (SVC) is a tool has been developed in collaboration with Sheffield Hallam University, following the most recent national modelling undertaken on behalf of DCMS, originally delivered in 2016 and refreshed in 2018.

5.5.4 Using the research of Sheffield Hallam University and by overlaying lifestyle data from Experian, the Social Value Calculator uses physical activity data and benchmarks to calculate the expected level of social value, which will be delivered by a facility or investment programme.

5.5.5 A relationship between sport, physical activity and 4 categories of social impact has been evidenced, in the areas of:

- Improved health
- Improved life satisfaction or 'subjective wellbeing'
- Increased educational attainment
- Reduced crime.

5.5.6 The Social Value generated by the WHPF scheme has been projected using estimated throughput data included within the feasibility study. Accounting for average visit patterns of members and non-members, including the crossover of individuals using multiple facility types, a total of 9,628 'active unique users' are projected to use the facilities and hit the social value threshold (4+ visits per month) over a given year.

5.5.7 The Social Value Calculator shows a value per individual 'active unique user' of £411 and a total projected Social Value of c. £3.95M per annum. This level of Social Value is significant and should be considered carefully alongside the financial modelling and the non-financial benefits described in this report and in assessing the overall business case for the proposed developments at WHPF.

5.6 Risk Management

All risks identified at the start of the project have been included within a detailed risk register which will continue to be monitored and updated throughout the lifecycle of the programme.

The risks identified are expanded on within Section 6 of the Outline Business Case and primarily relate to;

- Planning
- Funding
- Revenue
- Capital Cost
- Contractor Procurement
- Contractor Performance
- Construction Risks
- Operator Procurement
- Operator Performance

This has been developed with the input of specialist leisure consultants, their design team and cost consultants.

5.7 Equalities and Diversity

5.7.1 The master planning process has been subject to an extensive consultation and engagement process. This has also included an Equalities Impact Assessment as part of the reporting information presented to Environment Committee in March 2020. As the Outline Business Case progresses through design and procurement stages further equality impact assessments will be undertaken to ensure that the scheme considers access, inclusion and protected characteristics defined as part of the Equalities Act 2010.

5.8 Corporate Parenting

5.8.1 None.

5.9 Consultation and Engagement

5.9.1 Summer 2019, SLC supported the Council in undertaking a comprehensive public consultation on the final draft masterplan for West Hendon Playing Fields. This was delivered through a combination of face-to-face meetings, email correspondence, telephone discussions, workshops, public drop-in sessions and an online questionnaire with key stakeholders and the general public.

5.9.2 The consultation process engaged with over 900 local residents and stakeholders during the 8-week period which demonstrates a good level of engagement.

5.9.3 A full detailed summary of the Consultation Report and findings can be located in Section 11 of the Feasibility Study.

6. BACKGROUND PAPERS

SLC Feasibility Study and Draft Masterplan

[West Hendon Playing Fields - Feasibility Study including the Draft Master Plan – Barnet Open Data](#)

SLC Addendum Report, Consultation Report and Draft Final Masterplan

[West Hendon Playing Fields – Addendum Report, Consultation Report and Draft Final Master Plan – Barnet Open Data](#)

Environment Committee 12 March 2020, Sports Hub Masterplanning Report and Supporting Documentation (Item 7)

[Agenda for Environment Committee on Thursday 12th March, 2020, 7.00 pm \(moderngov.co.uk\)](#)

Environment Committee 14 March 2019, Sports Hub Masterplanning Report and Supporting Documentation (Item 8)

[Agenda for Environment Committee on Thursday 14th March, 2019, 6.00 pm \(moderngov.co.uk\)](#)

Draft Playing Pitch Strategy

[Draft Playing Pitch Strategy 2017 – Barnet Open Data](#)

Parks and Open Spaces Strategy

[Open Spaces Strategy – Barnet Open Data](#)

Outline Business Case (OBC): West Hendon Playing Fields

Author:	<i>Ryan Mann</i>
Date:	<i>April 2021</i>
Service / Dept:	<i>Greenspaces and Leisure / Capital Delivery</i>

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1. Introduction and Strategic Context

1.1 Executive Summary

This document presents the Outline Business Case (OBC) for the development of the West Hendon Playing Fields (WHPF) Sports Hub Masterplan.

The project aims to transform WHPF into a premier green space for Barnet's residents and a destination leisure facility which is amongst the best in London. The site is currently unwelcoming and characterised by its poor condition and connectivity. Through investment in facilities which have both commercial and community benefits, the site will become a sustainable, modern asset and a benchmark for future greenspaces development.

Central government's Five Case Model provides a methodology for the preparation of public sector business cases, comprising five key dimensions - each of which is met by the project as follows:

<p>The Strategic Case</p>	<p>The scheme fits within the Council's wider programmes and policies, including:</p> <ul style="list-style-type: none"> • Barnet Plan • Growth Strategy • Playing Pitch Strategy • Parks and Open Spaces Strategy • Transport Strategy <p>It proposes a solution to a specified business need, namely the requirement to ensure the Borough's greenspaces are meeting local demand whilst providing a sustainable service.</p> <p>Furthermore, the project is complementary to established programmes being undertaken within the Borough. This includes the West Hendon regeneration scheme, and the Brent Cross South development.</p> <p>Further detail on the project's rationale and its contribution to the Council's strategic objectives is available in Sections 1 and 2 of this document. Interfaces and dependencies with other schemes are included within Section 10.</p>
<p>The Economic Case</p>	<p>The project offers value for money through addressing the need to subsidise the facility, as is currently the case.</p> <p>A proportion of the Council's greenspaces maintenance budget is spent annually at West Hendon Playing Fields, whilst an increasing cost is incurred in the maintenance of existing buildings and facilities.</p> <p>A modest income is generated through the leases on the buildings as well as pitch bookings, but these are not sufficient to offset the significant expense outlined above.</p> <p>Section 7 includes a full financial appraisal of the scheme.</p> <p>Appropriate facilities have been included within the draft Masterplan following an exercise undertaken to establish those that will maximise</p>

	<p>the return on the Council's investment. Further detail is included within Section 4.</p>
<p>The Commercial Case</p>	<p>A robust procurement strategy will be implemented to ensure value is achieved in all appointments, including the main contractor.</p> <p>Following engagement with procurement and input from key partners and stakeholders, an approach will be determined which balances value with ensuring a quality, timely delivery.</p> <p>Specialist leisure consultants have been appointed to assess the leisure operator market and present the risks and opportunities associated with each management model for the site.</p> <p>Further engagement and assessment will be undertaken to procure an operator to partner with the Council in managing a site with a range of facilities and requirements.</p> <p>These elements are explored further in Section 4, including more detailed options analyses.</p> <p>As part of the development of the Outline Business Case, '4Global Sport' were commissioned to undertake analysis on the likely Social Value that the WHPF scheme would generate, this is anticipated at c£4m per annum.</p>
<p>The Financial Case</p>	<p>The affordability of the scheme has been confirmed through the development of an initial business plan produced with the support of specialist leisure consultants.</p> <p>This accounts for capital, revenue and whole life costs. Potential funding routes have been identified, including CIL and National Governing Bodies for Sport.</p> <p>Financial modelling and scenario testing has demonstrated the project's viability; income generated is expected to offset maintenance and other costs and will contribute an eventual revenue surplus of up to £361k per annum.</p> <p>Further detail is included in Section 7.</p>
<p>The Management Case</p>	<p>The project will be managed using Barnet's Project Management methodology, developed from PRINCE2.</p> <p>A robust Gateway system will provide the basis of robust assurance, whilst a clear route of escalation will be established for key risks and issues.</p> <p>The project will be managed via the West Hendon Playing Fields programme board, which will in turn report to the Greenspaces and Leisure board and Committees.</p> <p>Technical support will be procured to support these elements where required, and lessons learned from previous projects will be heeded.</p>

For further information, see Sections 8 and 9.
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1.2 Sports Hub Masterplans programme

As part of the development of the Council's Parks and Open Spaces Strategy, the quality and value of the Borough's parks were fully assessed. Their contribution to the Borough of Barnet can be broadly grouped into economic, social and environmental benefits, including:

- Enhancing the physical and mental health of residents
- Making Barnet a better place to live, work, learn and play
- Joining communities together by creating new green links between different parts of the Borough
- Preparing the Borough for the impacts of climate change by controlling flooding, reducing pollution and moderating temperatures
- Protecting and enhancing the Borough's cultural and natural heritage

A number of new policies are included within the Strategy to maximise this contribution, including the creation of new Sports Hubs with good quality facilities, across three key sites within Barnet:

- Cophall
- Barnet Playing Fields
- West Hendon Playing Fields

These 'Sports Hub' sites have been identified for their grass pitch provision, geographical location and proximity to growth and regeneration areas within the Borough. Further information regarding site selection and options analysis is available within Section 4 of this document.

1.3. West Hendon Playing Fields

West Hendon Playing Fields in its current form is a well-used community and sporting resource. It offers a range of outdoor leisure facilities, including football pitches, tennis courts and a cricket square. It is also home to a nursery, martial arts club and lawn bowls club, situated within a building in the north-east section of the site, whilst there is a significant ecological contribution from the site itself and its surroundings.

However, there are significant and obvious weaknesses in need of addressing, as follows:

- The site is unwelcoming, with little visual appeal and lacks an overarching identity
- The built infrastructure, including the aforementioned nursery and bowls club, is rundown
- The facilities are of a poor quality, with the tennis courts, play areas and playing pitches all in need of refurbishment or replacement
- Access to the site is poor, with connections between the playing fields and neighbouring areas in need of improvement
- Circulation routes within the site for cyclists and pedestrians are limited
- Drainage within the site is poor, with circulation routes and playing pitches occasionally left inaccessible after heavy rainfall
- There is a lack of coherent site-wide management capable of bringing together the various functions in an efficient manner
- The maintenance of the site is subsidised annually by the Council

Through regeneration of the site, the expected benefits (expanded upon further in section 5 of this document) are to:

- contribute towards the Greenspaces and Leisure Medium Term Financial Strategy (MTFS) and recovery plans by generating income,
- enable greater use of the site,
- promote a fit and active lifestyle for residents, and
- preserve areas of ecological importance.

West Hendon Playing Fields are maintained by the Council's Streetscene service, which maintains all Council parks and greenspaces. This project represents an opportunity to meet local need for sport and community facilities and exploit the unique nature and location of the site.

1.4. History

The Parks and Open Spaces Strategy 2016 to 2026 was agreed at the meeting of the Environment Committee in March 2016. An agreed action was to “*create new Sports Hubs with good quality facilities*”, and a number of sites were subsequently identified.

At the meeting of the Environment Committee on 13 July 2017 it was agreed that:

- Masterplans would be developed for both West Hendon Playing Fields and Barnet Playing Fields so as to create a Sports Hub
- Blended funding streams are pursued for the development of these Sports Hubs in line with the agreed Greenspaces Capital Investment Programme and the Playing Pitch Strategy (2017) for Barnet
- Authority would be delegated to the Strategic Director for Environment to procure appropriately qualified external support to develop the Masterplans for the sites in accordance with the Council's Contract Procedure Rules.

The Sport, Leisure and Culture Consultancy (SLC) were appointed in 2018 to undertake a feasibility study and develop draft Masterplans for the two sites. The work was reported to the 14 March 2019 Environment Committee and it was agreed that a public and stakeholder consultation exercise would be undertaken. SLC undertook this work in 2019 and final Masterplans were produced. The outcomes of the consultation were reported to the 12 March 2020 meeting of the Environment Committee, which showed that 72% of respondents were either ‘supportive’ or ‘very supportive’ of the Masterplan.

Recommendations that the final Masterplans were approved for the two sites were unanimously agreed by committee, and it was agreed that an outline business case would be brought forward for approval once finalised.

In December 2020, SLC were commissioned to review the financial models available to the Council, assessing the impact of borrowing on the scheme. The appraisal information was submitted to Policy & Resources Committee in February 2021 as part of a request for £1.4m of CIL monies to develop the scheme's business case. This submission was approved and thus included within the Council's capital programme.

2. Rationale

This project is aligned with a number of Barnet's key strategic documents and objectives which, in combination with the anticipated positive financial benefits, make it a priority scheme for the Borough. This is outlined in more detail below:

2.1. Barnet 2024

The expected benefits are in line with the Corporate Plan “Barnet 2024”, which includes the outcomes “A pleasant well-maintained Borough that we protect and invest in” and “Our residents live happy, healthy, independent lives with the most vulnerable protected”. The priorities that this project fits within are “Getting the best out of our parks and improving air quality by looking after and investing in our greenspaces” and “Encouraging residents to lead active and healthy lifestyles and maintain their mental wellbeing”.

2.2. The Barnet Plan

The project supports the wider strategy of the local authority and the upcoming Barnet Plan, and its four main priorities, in the following ways:

<p>Clean, safe and well-run - a place where our streets are clean and anti-social behaviour is dealt with so our residents feel safe; providing good-quality, customer-friendly services in all that we do</p>	<ul style="list-style-type: none"> • improvements to the quality of parks infrastructure • operational arrangements introduced to a site to ensure security, safety, maintenance and longevity • ecological improvements to a Site of Special Scientific Interest, increasing awareness of the natural environment
<p>Family friendly - creating a family friendly Barnet, enabling opportunities for our children and our young people to achieve their best</p>	<ul style="list-style-type: none"> • an informed and well-researched facility mix which caters for all age groups and considers all stakeholders • improved offer for younger people, including improved junior pitches and new, accessible community facilities
<p>Healthy - a place with fantastic facilities for all ages, enabling people to live happy and healthy lives</p>	<ul style="list-style-type: none"> • development of facilities to promote healthy and active lifestyles among residents • inclusion of free-to-access facilities alongside more specialist options, to provide a unique offer to local residents • improvement to community facilities
<p>Thriving - a place fit for the future, where all residents, business and visitors benefit from improved, sustainable infrastructure and opportunity</p>	<ul style="list-style-type: none"> • Improvements to cycle and pedestrian routes through the park, increasing Barnet’s offer in terms of active travel • A significant placemaking contribution to the wider West Hendon regeneration works • Improvement to facilities for existing local businesses

2.3. Growth Strategy

A Sports Hub at West Hendon Playing Fields has been identified within the Council’s Growth Strategy 2020 - 2030.

The strategy’s key themes behind promoting sustainable growth within Barnet’s communities are included below, along with ways in which the project fits within their objectives:

- A growing Borough
- A connected Borough
 - Delivering a cleaner, greener and more pleasant Borough through the promotion of active travel and increased connectivity of cycle and pedestrian routes in the west of the borough, thus reducing congestion and increasing air quality
- An entrepreneurial Borough
 - Creating job and skills development opportunities for local people in both the delivery phase of the project and its subsequent operation as a destination leisure facility

- Supporting local businesses through the improvement of premises and surrounding infrastructure
- Promoting local supply chain opportunities through development
- A Borough of thriving town centres, and
- A great Borough to live in and visit
 - Delivering the social infrastructure to support the community and wellbeing requirements associated with the wider West Hendon regeneration programme
 - Getting the best out of the Borough's green assets by improving the quality of the playing fields and offering further opportunity for residents to maximise their health and wellbeing
 - Creating a destination facility with regional significance, offering specialist leisure opportunities to residents of both Barnet and its neighbouring Boroughs

2.4. Covid-19 Recovery

The coronavirus pandemic and subsequent lockdowns have resulted in an increased usage and focus on Barnet's parks and green spaces. Meanwhile, the economic impact of Covid-19 on the leisure sector highlights the need to secure its financial sustainability through sound investment in facilities.

The Council is currently undertaking a significant programme of investment in town centres. Functional green space will support the development of local areas such as Burnt Oak and Brent Cross through improving travel, employment opportunities and community facilities crucial to the wellbeing of local people.

As part of their feasibility work, SLC were commissioned to report on the potential impact of the pandemic on the project's business plan. It is assumed that the timescales of delivery associated with the project will limit its financial impact, though the effects on the market and user activity will need to be monitored as project planning develops.

2.5. Transport and Sustainability Strategies

Barnet's long-term Transport Strategy for 2020-41 was adopted by Environment Committee in September 2020.

Within the strategy, West Hendon is identified both for its significance as a regeneration area, but also its place within the A5 road corridor, a key characteristic of the West of the Borough.

The Strategy includes a proposal to develop the Borough's cycle network as a means to increase active travel amongst residents. This would involve converting the existing Dollis Valley Greenwalk into a loop. West Hendon would act as a link point between its existing start and end points. The WHPF project has the potential to offer a safe and scenic route for leisure cyclists as an alternative to car use.

Meanwhile, work is ongoing to develop an updated Sustainability Strategy for the Borough. Most recently, an update was reported to Environment Committee in March 2021.

The document focuses on several key themes, including transport, waste and energy and the natural environment, in an effort to meet the Council's vision to be a thriving and sustainable community living with our environmental limits.

Alongside the transport and travel improvements outlined above, the project will make a key contribution to the area's sustainability through drainage improvements, increasing awareness and understanding of the Welsh Harp, as well as utilising sustainable methods of construction and development within the site.

3. Project Definition

3.1. Programme objectives

The high-level objectives of the West Hendon Masterplan are as follows:

- Deliver improvements to West Hendon Playing Fields which contribute to the corporate objective of making Barnet's parks and green spaces 'among the best in London'
- Support the health and wellbeing of Barnet's residents through the provision and protection of fit-for-purpose sport and leisure facilities
- Improve the biodiversity and connectivity of the site, including the improvement of cycling and pedestrian routes within the playing fields

3.2. Programme scope

The adopted Masterplan outlines the delivery of the following elements:

- Development of community Sports Hub, including nursery, bowls club, studios, office space, changing rooms and café
- Provision of 2no. 3G all-weather pitches and improved grass playing pitches in line with recommendations of Barnet's Playing Pitch Strategy
- Provision of multi-use games area (MUGA), 2no. play areas and outdoor gym and trim trail
- Provision of wheeled sports facility and new tennis courts
- Development of high ropes and adventure golf courses
- Improvements to the site's biodiversity and pedestrian and cycle route, including a nature trail and community garden

3.3 Community Sports Hub

The high-level brief for the Community Sports Hub itself, as devised by leisure consultants SLC, is as follows:

- A café, kitchen and food storage area suitable for preparing and serving hot and cold snacks
- Public toilets, including provision for those with disabilities and baby-changing facilities
- A clip and climb / indoor climbing area suitable for both children and adults
- Indoor adventure soft play area
- A new nursery area with associated office, kitchenette, toilets and storage
- Open plan office area for Community Sports Hub
- Multi-use community rooms with adjacent storage
- New facilities for Hendon Bowls Club, including function room, changing accommodation and toilets
- Multi-use activity studios suitable for exercise classes, martial arts, boxing, gymnastics etc
- Changing rooms to Sport England standards to support the sports facilities on site

3.4. Outdoor Facilities

A proposed brief for outdoor facilities is included below.

Improved and reconfigured football pitches	<p>Grass football pitches to be reconfigures in accordance with LBB's Playing Pitch Strategy to create the following:</p> <ul style="list-style-type: none"> • 2 full size adult pitches • 4 junior (U13/14) 11 v 11 pitches • 1 junior 9v9 pitch • 1 junior 7v7 pitch • 1 junior 5v5 pitch <p>Surface, levels and drainage are to be improved throughout to FA standards</p>
3G Artificial Turf Pitches (ATPs)	<p>2no full size 3G surface ATPs are to be provided, each to be screened with robust fencing approximately 2 metres high with lockable gates, rebound boards and floodlighting, subject to planning conditions - pitch markings to include for small-sided and junior football</p>
Multi Use Games Area (MUGA)	<p>A multi use games area is proposed for year-round use with a porous macadam surface suitable for a range of sporting activities, including netball, basketball and five-a-side football; enclosed by 2m-high fencing and with rebound boards and floodlit, subject to planning considerations</p>
Tennis Courts	<p>Existing two tennis courts are to be resurfaced for general games use, and fencing - it is not proposed that floodlighting is installed; application of charging scheme to be confirmed</p>
Wheeled Sports Facility	<p>Wheeled sports facility to be designed and constructed by a specialist operator for skateboarding, scootering and BMX</p>
Bowling Green	<p>The existing six rink bowls green for Hendon Bowls Club is of a good standard and the club has a good standing in its sport; it is proposed to be retained including its surrounding fencing and screening - the phasing of the Masterplan should allow play to be continued throughout the construction period</p>
Adventurous Play and Toddler Play	<p>The current play area and equipment are of poor quality and are to be replaced; it is proposed that there will be a new play area for younger children and more adventurous play facilities and equipment designed to appeal to older children</p>
Outdoor Gym and Trim Trail	<p>There will be freely available purpose-designed outdoor exercise equipment suitable for all ages with simple instructions and signage; the outdoor gym will be in an area overlooked by footpath and cycle routes to provide visual interest - this will then lead to a trail of fixed equipment sited on pedestrian and cycle routes, which will provide a planned training path</p>
Adventure Golf	<p>Subject to specialist design, the adventure golf course is a year-round activity similar to mini golf, with fun features and obstacles, suitable for all ages and particularly family use - there will be low level lighting for evening activity; entry and priced admission will be controlled at a separate kiosk</p>
High Ropes	<p>The layout and design of the high ropes course will require design input from a specialist operator with different sections suitable for all ages; the course is to be integrated to make</p>

	use of the existing site contours and trees - it will feature a course of high-level platforms, some supported from trees or frames, linked by different types of rope access routes. There will also be zip wire routes for older children and adults.
Woodland Nature Trail	The woodland nature trail will be integrated with the pedestrian and cycle trails and designed to stimulate and inform children and adults of the existing natural environment. There will be interpretive signage linked to images and educational content within the Community Sports Hub.
Sensory Garden and Community Garden	Two garden areas are proposed, which may be adjacent - the sensory garden will be designed to stimulate different sense through the use of colour, sound and smell which can be particularly beneficial for those with a range of disabilities. The community garden is designed to be cultivated by members of the community who will take ownership of the area. It will provide an opportunity to be physically active, encourage community interaction and cohesion and can help tackle mental health issues linked to social isolation.
Pedestrian and Cycle Routes	New combined pedestrian and cycle routes are proposed to provide access routes in, around and across the site.

Further detail and illustrative images of the above are included within the SLC feasibility report, which can be located via Section 12 of this document.

The rationale behind the inclusion of the above is included in Section 4 below.

4. Options

4.1. Site Selection

As discussed in Section 1, West Hendon Playing Fields was identified alongside Barnet Playing Fields and Barnet Copthall as having potential for development as a regional Sports Hub. All sites currently rely on a Council subsidy for maintenance and improvement works.

Primarily, these sites were selected for their significance as sports and recreation sites, home to a large quantum of playing pitches and existing facilities. The Council's Playing Pitch Strategy highlights their potential to contribute significantly to local demand for playing pitches, especially in terms of football.

Development of the sites as Sports Hubs with community and commercial elements - including all-weather pitches - presented an opportunity provide a previously untapped source of revenue to the service.

Geographically, the sites cover a significant portion of the Borough - Barnet Playing Fields to the north, Copthall centrally and West Hendon to the south-west. This would ensure their services would reach a majority of Barnet's residents.

In the case of Barnet Playing Fields and West Hendon, their proximity to regeneration areas provided further opportunity for investment in adjacent greenspaces. Considered alongside the potential for external funding, the opportunity to utilise CIL monies generated by these regeneration schemes limits the reliance on Council borrowing to improve the leisure facilities and meet the needs of an expanding local population.

West Hendon in particular has been identified within the Local Plan as the location for thousands of additional homes in the Borough. Situated within the A5 growth corridor, the Council's growth strategy outlines the critical contribution of place-making to an area's success. Improvements to West Hendon Playing Fields will provide green travel and infrastructure enhancements needed to successfully transform the area into a dynamic urban area for living, employment, leisure and social interaction.

4.2. Facility Mix

The facility mix included within the adopted Masterplan was the result of a series of consultation exercises undertaken by specialist leisure consultants. Reviewing the market, consumer behaviour and consulting with stakeholders, a comprehensive offer was devised which covers the following:

- A mix of accessible facilities and commercial elements to support the business plan
- Meets the demand of both individuals and organised sports within the community
- Specialist options, including high ropes, which contribute to establishing the site as a unique destination facility

4.2.1 Needs analysis

Initially, a needs analysis was undertaken using a supply and demand analysis and initial stakeholder engagement. The initial analysis looked at the provision of activities and facilities across Barnet and the surrounding area, assessing the market potential of each.

Key stakeholders from LBB, National Governing Bodies for Sport (NGBs) and current users of the site were then consulted to inform the assessment of a long list for potential facility options for WHPF.

This identified a strong demand for café provision, multi-use indoor space, the importance of free facilities and a desire to promote the ecological interest of the site. A long list of potential facilities was then compiled, combining core provision behind the Council's strategic priorities, re-provision and enhanced facilities, and complementary facilities designed to diversify and extend the site offer. The full long-list is available to view within the feasibility report provided to Environment Committee in March 2019.

It was found that there is an oversupply of health and fitness stations within the Borough, and therefore no unmet demand for additional facilities to be provided within the scheme. On the other hand, there is currently no competing provision of high ropes facilities within the catchment area reviewed, suggesting their inclusion would have good potential in terms of contributing to the scheme as a 'destination' facility.

4.2.2 Wider stakeholder engagement

Feedback was then sought on this longlist from wider stakeholders and the general public. This consisted of telephone calls and meetings with key stakeholders, including the West Hendon Regeneration Partnership Board.

A public questionnaire was also publicised online via the Council's consultation platform, Engage Barnet. This was also sent out to consultees involved in the initial engagement, current users, local sports clubs and other organisations that may have an interest in the future development of WHPF.

The wider stakeholder engagement provided good levels of engagement with local people and was extremely useful in capturing views and opinions of local people on the current site offer and providing an indication of preferences from the long list of potential facility development options.

There was a clear desire to improve the provision of facilities and activities on WHPF but balanced with concern regarding anything that would impact negatively upon the peaceful nature of the site, and wildlife habitats.

The longlist options were then prioritised against the following criteria, to finalise the proposed facility mix:

- Contribution to Barnet Council's strategic objectives
- Meeting identified need (supply and demand analysis and feedback from stakeholder engagement)
- Revenue implications
- Capital cost and funding considerations
- Planning considerations
- Deliverability (practical considerations e.g. footprint, key dependencies, phasing requirements etc.)

Further details around the consultation exercises undertaken is included within this document at Section 11. The full justification behind the Masterplan's composition is included within the feasibility report and report to Environment Committee in March 2020.

4.3. Delivery Options / Procurement Strategy

In terms of construction and delivery of the Sports Hub building and supporting infrastructure, it is accepted that a design and build approach will be utilised to meet programme requirements and ensure specialist input is received at an early stage of the project.

There are multiple elements to consider within the development programme, including the Sports Hub building itself, both soft and hard landscaping elements, infrastructure and specialist elements including high ropes and artificial turf pitches.

Market testing and further analysis with the support of a technical team will support the decision-making around the appointment of contractors, including procurement approach, form of contract and phasing of delivery.

These elements are co-dependent on the procurement approach to the operator, outlined below, as well as any conditions placed on funding arrangements - for example, using a specified contractor for 3G pitches to access Football Foundation funding.

4.3.1. Risk and opportunities

Construction Procurement Option	Opportunities	Risks
Single stage tender	<ul style="list-style-type: none"> Ensures competitive tenders. Likely to produce lowest cost at tender stage assuming all design work is completed and there is interest from contractors Design team remains engaged directly by LBB. 	<ul style="list-style-type: none"> Tender opportunity may not be attractive to a wide range of contractors. Will depend on tender market at the time Contractor not committed until appointed Assumes all design work completed before tendering which may not be possible (input from operators etc.) Assumes LBB mitigates risks before tender Design risk lies with design team appointed by LBB.
Two stage tender	<ul style="list-style-type: none"> Ensures engagement from contractor and sub-contractors earlier in the process More transparent competitive process allowing for prices to become available as tenders from sub-contractors are received Allows adjustment to design during first stage Fixed price tender after first stage and quicker lead in time than single stage Design team remains engaged directly by LBB. 	<ul style="list-style-type: none"> Contractor may not perform well in first stage and process will have to be restarted with second choice of contractor. Fee payable to contractor for first stage may not be recovered Two stage tender requires more input from contractors after appointment for first stage so the opportunity attraction for contractors depends on tender market at the time.
Design and Build	<ul style="list-style-type: none"> Places risk with contractor and their design team. One-stop process. 	<ul style="list-style-type: none"> Risks for this project may not be transferable to contractor and may attract high premium Requires longer period for tendering Design changes after acceptance of tender attract high cost Client will lose direct engagement with design team unless client advisory team also appointed.
Design, Build, Operate and Maintain (DBOM) by external leisure operator	<ul style="list-style-type: none"> Places risk with leisure operator and their design team. One-stop process. 	<ul style="list-style-type: none"> Risks for this project may not be transferable to contractor and may attract high premium

Construction Procurement Option	Opportunities	Risks
		<ul style="list-style-type: none"> Requires longer period for tendering (usually through competitive dialogue) Design changes after acceptance of tender attract high cost Client will lose direct engagement with design team unless client advisory team also appointed Small number of operators willing/able to deliver DBOM solution (potentially even smaller as a result of Covid) Will require a much more complex and longer term management contract (c. 20+ years) tying the Council into an arrangement that may be more difficult to flex in accordance with changes in priorities.
Construction Management	<ul style="list-style-type: none"> Trade contractors are contracted to LBB but managed by a construction manager. 	<ul style="list-style-type: none"> Process over complex for this project.
Local Authority Contractor Framework	<ul style="list-style-type: none"> Shortens contractor selection process Priced overheads and profit already declared. 	<ul style="list-style-type: none"> Contractors available on list may not be suitable for this project Framework rates and additional cost of managing framework combined will not be as competitive as single stage or two stage.

4.4. Management Model Options

As part of the original feasibility study, SLC undertook an appraisal of the management model options for the operation of the facilities proposed for WHPF. These options included:

- **Option 1** – In house / Direct delivery: 37.8%
- **Option 2** – Outsourcing to single external operator: **79.8%**
- **Option 3** – Outsourcing to multiple external operators: **79%**
- **Option 4** – Transfer of parks to a charitable trust: 50%
- **Option 5** - Community Sports Association (CSA): 30.4%

The appraisal included an evaluation of each management model option against an agreed set of financial and non-financial criteria and identified the two outsourcing options - procurement of a single operator or multiple external operator(s) - as being the clear preferred options.

Either option is likely to be based on a management contract, supported by a detailed services specification which links directly to the Council's strategic priorities and contributes strongly to its strategic outcomes.

Given the projected timeframes for delivery of the scheme, it is assumed that the current Covid-19 pandemic will have ceased, and that normal trading of park/leisure operations will

have been restored in accordance with pre-Covid conditions. It is also assumed that the external operator market will have recovered to pre-Covid levels of activity.

These are key risks which are identified within an important aspect of the transformation workstream will need to re-engage with the operator market as part of determining the final appropriate management option (3 or 4).

4.4.1.Risks & Issues

In considering options for the future management of facilities the project will need to ensure a strong and sustainable revenue position and the delivery of high-quality facilities, this will be tested through pre-procurement activity including any opportunities for engagement related to design development.

The indicative issues which have been identified for a single management operation and multi-site operation are outlined in the table below:

Procurement Option	Opportunities/Benefits	Risks
<p>Single External Operator</p>	<ul style="list-style-type: none"> • Operator takes commercial risk • Operator may take on full maintenance and lifecycle replacement risk • Opportunity to establish a secure, fixed revenue position as a result of a contractually binding management fee with the operator • Single contract and point of contact with one supplier operating the whole site • Operator may have access to capital or be able to lever in external funding for investment into facilities and/or programmes • Operator will have strong commercial expertise and experience of delivering similar services • Operator will be contractually obliged to deliver the services in accordance with the Council's strategic priorities, as set out within the contract specification. • The Council will be able to focus upon the strategic direction of the service and its contribution to local strategic outcomes without the burden of commercial and operational responsibilities • The Council will have a single point of contact and single contract to manage and oversee for the site 	<ul style="list-style-type: none"> • Facility mix is diverse and some elements are not 'core' offers for leisure operators • Operator may decide to sub-contract elements of the services leading to more fragmented offer • Operator likely to take a 'margin' on the sub-contracted elements of the services • Operators more risk averse as a result of Covid-19 and may see a 'non-core' offer as being less attractive / more risky • Access to capital or willingness to invest reduced post Covid-19.

Procurement Option	Opportunities/Benefits	Risks
Multiple External Operators	<ul style="list-style-type: none"> Operators take commercial risk Operators may take on full maintenance and lifecycle replacement risk Opportunity to establish a secure, fixed revenue position as a result of a contractually binding management fee with the operators Operators may have access to capital or be able to lever in external funding for investment into facilities and/or programmes Operators will have strong expertise and experience of delivering similar services and will be well placed to provide a high-quality service that is professionally marketed and meets the needs of users Operators will be contractually obliged to deliver the services in accordance with the Council's strategic priorities, as set out within the core requirements of the contract specifications The Council will be able to focus upon the strategic direction of the service and its contribution to local strategic outcomes without the burden of commercial and operational responsibilities. 	<ul style="list-style-type: none"> Overall offer likely to be more fragmented and greater potential for conflict between operators over shared use areas of the site, areas of shared responsibility etc. Council would need to manage multiple operators working to different agreements (risk share, contract length, financial arrangements etc.) which has client-side resource implications Risk of underperformance of specific operators and failure of certain elements Operators more risk averse as a result of Covid-19 Access to capital or willingness to invest reduced post Covid-19.

5. Expected Benefits

5.1 Expected benefits

The potential benefits of the scheme are outlined below:

Financial - annual surplus	The scheme is forecast to generate (before interest and MRP costs) an annual revenue surplus of up to £361k per annum, including operational costs. This is explored further in Section 7 of this document.
Placemaking	The scheme forms a core placemaking element of the wider regeneration of West Hendon, which has seen development of 2000 new private and affordable homes. It will provide a valuable asset for use by local communities, generate new employment and volunteering opportunities, and act as a much-needed positive addition to the area.
Strategic	The scheme aligns strongly with a number of Council strategies, including the Fit and Active Barnet Framework, the Parks and Open Spaces Strategy, the Playing Pitch Strategy, the Growth Strategy and the Joint Health and Wellbeing Strategy. Further detail is included within Section 2 of this document.
Stakeholder perception and engagement	The scheme has been subject to extensive consultation and engagement with over 900 users, wider stakeholders and local residents, with almost three-quarters being either supportive, or very support of the overall development. Further information is included within Section 5.3 of this document.

Pitch provision for local sports clubs	The scheme will help to meet the specific needs of local sports clubs for grass football pitches (particularly junior pitches) and Artificial Turf Pitches, as identified within the Council's Playing Pitch Strategy.
Free-to-access facilities	The scheme will meet local demand for free-to-access activities and facilities including a wheeled sports facility (skateboarding, scootering and BMX).
Improved indoor facilities	The scheme will provide improved indoor facilities for existing users including the bowls club, nursery and martial arts club, additional community meeting space and additional indoor activities such as soft play and climbing, providing more opportunities for local children and young people to be physically active.
Condition enhancements	West Hendon Playing Fields is currently in poor condition, is unwelcoming and underused. The proposed developments will revitalise the site, providing valuable and much-needed open space.
Ecological improvements	The scheme will capitalise upon the unique ecological interest of WHPF and the Welsh Harp, and its designation as a Site of Special Scientific Interest (SSSI) by widening awareness through education and interpretation, and by improving access to enable more people to learn about this important but little-known natural asset.

5.2. Social Return on Investment

As part of their work on the feasibility study, leisure consultants SLC commissioned the 4Global Sport Planning Team to undertake analysis on the likely social value that the West Hendon Playing Fields scheme could generate.

Developed with Sheffield Hallam University, the social value calculator uses physical activity data and benchmarks to calculate the expected level of social value which will be delivered by a facility or investment programme.

A relationship between sport, physical activity and four categories of social impact has been evidenced, in the areas of:

- Improved health
- Improved life satisfaction or 'subjective wellbeing'
- Increased educational attainment
- Reduced crime

A monetary value is then applied to each using the following methodology:

Health	<p>Health savings are calculated using the prevalence rates of each condition included within the outputs, as well as the cost of treatment and the impact of physical activity/exercise.</p> <p>The calculation considers the reduction in risk of a condition, which can be attributed to consistent activity, and uses this to define the cost saving per case, according to the original cost of treatment.</p>
Subjective Wellbeing	In general, wellbeing can be defined as a broad measure of how well someone's life is going, while valuation is described as the monetary worth of something, therefore in short Wellbeing Valuation (WV) can be defined as an approach to valuing non-market goods (like social outcomes) by assessing the impact these goods have on an individual's wellbeing.

	<p>This form of valuation is not based on preferences but uses subjective wellbeing data to attach values to these non-market goods, like increased confidence. This approach starts with an analysis of people’s overall life satisfaction, applies econometric methods to estimate the life satisfaction provided by the non-market good, and then converts this into a monetary value by combining it with an estimate of the effect of income on life satisfaction.</p> <p>Using the Wellbeing Valuation method ensures that the social values you use to calculate your impact are robust and can be relied upon to demonstrate your social impact. Using a valuation methodology that is consistent also allows for comparison across different program areas, helping to inform your decisions about where investment is best allocated.</p>
Education	<p>Educational attainment was valued by estimating the number of additional sports participants with formal qualifications (level 2 and level 3) by the average lifetime productivity returns.</p> <p>The second education-related outcome represents the value of an individual's enhanced skills, gained through participating in sport at university. It was valued by estimating the number of final year students in Higher Education Institutions doing sport, multiplied by the average additional starting salary for sports participants.</p>
Crime	<p>The crime outcome is valued by estimating the number of criminal incidents prevented amongst males in the 10-24 cohort taking part in sport/exercise, multiplied by the average cost per incident of crime.</p>

The social value generated by the WHPF scheme has been projected using estimated ‘throughput’ data provided by SLC - the number of site users per year. Users visiting the site are expected to obtain around £411 per individual of social value, producing a total of £3.95m in monetary terms.

A Health Impact Assessment has also been undertaken by LBB’s Public Health team which further assesses the potential health benefits of the scheme. The report concludes that the proposed development will have a positive impact on the health and wellbeing of residents.

There are positive outcomes associated with the scheme, in particular in helping residents ‘start, live and age well’. The report’s recommendations include for inclusion of community rates on some facilities, promoting active travel to the site as well as within it, and ensuring healthier eating is included as a priority within the procurement of the proposed café.

Suggestions were also made in terms of indicators to be used to monitor outcomes around health and physical activity. These, and the above recommendations, will be included within the project’s full and final business case.

5.3. Stakeholder perception and engagement

As above, over 900 users and site stakeholders were consulted as part of the initial Masterplan process in 2018-19. This includes an online survey carried out by over 200 local residents via the Council’s Engage Barnet portal.

Of those that used the site, 40 per cent visited once or twice a week, the primary reason being to walk (almost 60 per cent). Very few - only 10 per cent - cited using the park as a meeting place as a reason to visit.

When asked why they did not visit the site, the primary reasons given included a lack of awareness and a lack of relevant facilities. Also cited were a preference for other parks, and poor transport or accessibility.

Over 70 per cent of responses highlighted that they would like to be more physically active, and a similar number confirmed that the proposed facilities in the Masterplan would encourage them to be more physically active.

Overall, 72 per cent of respondents were in support of the proposals. This, and other details included within SLC's report on consultation, will inform the development of measurable benefits to be included within the Full Business Case.

6. Risks

Risk will be managed according to Barnet Council's risk management methodology. All risks identified at the start of the project have been included within a detailed risk register which will continue to be monitored and updated throughout the lifecycle of the programme. This has been developed with the input of specialist leisure consultants, their design team and cost consultants.

The headline risks are outlined in the table below:

Description	Impact	Likelihood	Mitigations
Planning - Scheme fails to secure planning approvals from local planning authority and GLA, e.g. due to impact on Metropolitan Open Land, SSSI etc.	5	2	LBB planning consulted as part of early stakeholder engagement. Pre-application discussions to be undertaken with both LBB and GLA as design work progresses. Amendments made to design during first phase of consultation.
Funding - Council are unable to obtain external funding required to ensure business case remains viable.	4	2	Identification of external funding streams included within consultancy support. Robust argument made to justify utilisation of Community Infrastructure Levy and other Council streams of funding. Applications to be made for NGB monies where appropriate, e.g. Football Foundation funding for artificial pitches.
Revenue - Scheme is unable to generate required revenue to justify investment.	4	2	Specialist leisure consultants appointed to produce facility mix, result of comprehensive stakeholder engagement and market analysis. Review undertaken to account for impact of Covid-19 on consumer behaviour and market. Experienced leisure operator(s) to be appointed to manage site, including marketing and community engagement.
Contractor procurement and performance - Council is unable to	4	1	Full market testing and procurement options analysis to be undertaken ahead of tender exercise. Robust tender exercise to

identify and appoint contractor(s) with sufficient ability to deliver construction/landscaping elements to programme and budget.			be undertaken with support of LBB procurement team and external, specialist consultants. Technical team to be appointed to manage contractor and consultant performance throughout construction phase. Governance arrangements to be put in place to support.
Operator procurement and performance - Council is unable to secure partner able to manage and operate site upon completion of development.	4	1	Full market testing to be undertaken with support of specialist leisure consultants. Specific workstream identified to manage process and necessary appointments. External support to be retained for support with contract management. Initial risk analysis of various management approaches undertaken.

7. Financial Appraisal

7.1. Current status

As one of Barnet's major playing fields, West Hendon Playing Fields is a key beneficiary of the Council's £3.8m annual budget for the maintenance of its 465 hectares of parks and green spaces. The annual cost of maintaining WHPF and its 30 hectares is approximately £245k per annum.

There is a rising cost to the maintenance of the buildings and facilities which exist on site and have done so for a number of decades. These facilities are reaching the end of their useful life, and include the nursery building in the northern section of the site, the bowls club and martial arts club, as well as the park's tennis courts.

Furthermore, the site has increasingly become the focus of anti-social behaviour with its own cost implications. Without a regular on-site presence and run-down facilities, instances of fly-tipping and vandalism have increased.

The site currently offers very little by way of revenue opportunity to operate as a sustainability facility in its own right. The playing fields are home to a number of football pitches which generates a limited income through bookings, whilst the leases agreed with the nursery and martial arts club are valued at around £20k each a year, not sufficient to offset the costs of wider site maintenance.

This project aims to address these issues through targeted and sustainable investment.

7.2. Funding Strategy

In November 2020, SLC were recommissioned to further assist with a financial appraisal of the feasibility study which would support a funding strategy for scheme implementation.

Key outputs required by the project brief include:

- To develop a financial model that sets out the net financial position including capital costs and funding, lifecycle costs, equipment replacement provisions, estimates of income and the net operational position for a range of model scenarios

- To understand the level of investment and the financial viability of modelled options, in terms of capital, revenue, Internal Rate of Return (IRR) and overall cashflow against each scenario
- To consider the level and timing of capital receipts / funding or external finance that can be used to finance the capital investment
- The model should include an assessment of expenditure which is likely to influence the terms of any future lease negotiation and / or asset transfer arrangement.
- Provide a headline summary of procurement options available (construction and operational), identifying where there are any opportunities / associated risks
- Undertake a key risk assessment for each of the options linked to the sustainability of each option including (as a minimum):
 - Third party income risk from demand by users
 - Operating risks
 - Lifecycle risks
 - Construction risks
 - Procurement risks
 - Legal risks
- Provide a cost estimate of the Social Return on Investment based on associated capital expenditure
- Provide an outline of non-financial benefits associated within the scheme and where relevant indicate approximate value

The sections below capture updated information which has been incorporated into the Outline Business Case.

7.3. Capital cost

As part of SLC's initial feasibility work, a high-level business case was developed. Their cost consultants, Castons, devised a budget estimate for the capital works.

FACILITY	BUDGET COST ESTIMATE
Indoor Facilities	
Community Sports Hub (incl. temporary facilities)	£4,726,000
Outdoor Facilities	
2 x 3G Artificial Turf Pitches	£1,800,000
Grass Pitches	£200,000
Multi Use Games Area	£145,000
Tennis Courts	£160,000
Wheeled Sports Facility	£580,000
Adventure Play Area	£460,000
Toddler Play Area	£70,000
Adventure Golf Course	£295,000
High Ropes Course	£370,000

FACILITY	BUDGET COST ESTIMATE
Outdoor Gym and Trim Trail	£150,000
Demolition, External Works and Landscaping	£3,126,000
Sub Total	£12,082,000
Phased Working Allowance	£181,000
Contingency (10%)	£1,226,000
Professional fees, surveys and Furniture, Fittings & Equipment (FFE)	£1,354,000
Inflation to construction midpoint (Q2 2024)	£1,780,000
TOTAL DEVELOPMENT COST	£16,620,000

Note that the above is based upon the appointment of a single contractor.

7.4. Business plan

A high-level business plan was developed by SLC as part of the original feasibility study by providing the Council with an indication of the potential revenue position in terms of an operational surplus or deficit for each of the proposed facility developments and the site as a whole.

This previous business plan was for a period of 10 years and so did not include lifecycle replacement costs beyond general small-scale replacement of equipment.

In developing the overall business case over 30 and 50 years, it is therefore necessary to review, refine and update the business plan to ensure it is suitably robust and includes these additional 'whole life' costs.

The Business Plan below provides a further analysis of a likely income and expenditure associated with delivering the masterplan. The plan profile is assumed that a single / multi-site operator would be awarded a contract to deliver such services for residents, managed by the Council.

The key changes to the business plan include:

- Extending the business plan to cover a 30 and 50-year period (previous version was 10 years)
- More detailed development of projected expenditure (previous business plan was based on high level assumptions regarding expenditure associated with the different facility developments)
- Updating the 'yields' (prices) associated with income generation of the different facility developments on the basis that two years has passed since the original business plans were developed
- Including lifecycle replacement costs (or sinking fund) as an additional 'below the line' cost
- Removing inflation consistent with the approach used within the financial model (described in Section 3)

- Sensitivity analysis to demonstrate the financial implications of under/over performance.

The original business plans were developed prior to the current Covid-19 pandemic which has subsequently had a significant negative impact upon the leisure industry. However, given the timeframe for delivery of the scheme (all facilities open to the community in 2025), it is assumed that the pandemic will have ceased and normal trading of leisure operations will have been restored in accordance with pre-Covid conditions. The revised business plan therefore reflects this assumed position.

Income	£ per annum
Grass Football Pitches	£19,159
3G Artificial Turf Pitches	£253,496
Tennis Courts	£4,500
Café	£25,000
Nursery Rent	£38,500
Community Rooms	£48,938
Multi-Use Activity Space	£141,000
Clip and Climb	£237,250
Soft Play	£101,250
Adventure Golf	£216,250
High Ropes	£342,500
Total Income	£1,427,843

Expenditure	£ per annum
Staffing Costs	£566,500
Repair & Maintenance	£153,628
Utilities	£61,110
Marketing	£27,787
Cost of Sales	£13,750
Admin / IT / Office Costs	£13,893
Equipment	£6,947
Cleaning	£6,947
Licenses / Insurance / Finance Costs	£20,840
Irrecoverable VAT	£24,424
NNDR	£4,270
Total Operational Expenditure	£900,096
Central Overheads (6% income)	£83,361
Operator Profit (6% of income)	£83,361
Management Costs	£166,721
Total Expenditure incl. Management Costs	£1,066,817
Total Operational Surplus	£361,026
Lifecycle Replacement / Sinking Fund	£199,637
Net Surplus	£161,389

This includes operational costs, operator profit and a sinking fund. As a result, the annual surplus is expected to be somewhere between £161k and £361k, depending on the level of sinking fund required.

7.5. Funding models

An assessment has been undertaken to identify the extent of prudential borrowing that the net revenue income generated by the scheme could support and subsequently the amount of additional funding required from other sources (S106 / CIL / other) in order to achieve a breakeven position or zero additional revenue contribution. It also identifies the extent of additional revenue contribution that would be required to support borrowing based on options where (50:50 borrowing / S106 and CIL) and 100% borrowing are required.

The results of this assessment, as shown below indicate that the net revenue income could support interest repayments but not principal (MRP) of £9.4M or 57% of the capital over 30 years or £9.9M or 60% over 50 years, through prudential borrowing.

Model Description		100% Prudentia I	100% Prudentia I	100% S106/CIL	100% S106/CIL	50% Prud/ 50% S106/ CIL	50% Prud/ 50% S106/ CIL	65% Prud/ 35% S106/ CIL	65% Prud/ 35% S106/ CIL
Loan Period		30 Years	50 Years	30 Years	50 Years	30 Years	50 Years	30 Years	50 Years
		£m	£m	£m	£m	£m	£m	£m	£m
Net Revenue Expenditure/(Income) before MRP	A	3.25	5.01	(4.23)	(7.46)	(0.49)	(1.22)	0.63	0.65
Net Revenue Expenditure/(Income) including MRP	B	19.87	21.63	(4.23)	(7.46)	7.82	7.09	11.44	11.45
Net Revenue Expenditure/(Income) NPV	C	12.39	10.45	(2.38)	(3.20)	5.01	3.62	7.22	5.67

The above table shows the scheme's potential to deliver significant returns on investment (based on the SLC business case), should the need for prudential borrowing be avoided. The cost of this would be prohibitive even in a mixed model. The best-case scenario, therefore, is for the scheme to secure CIL monies and external grants where possible, in which case up to £7.46m of revenue could be generated over a 50-year period.

7.6. Total Project Cost

Further to the costs included within SLC's feasibility report, the Council has considered additional activities required to deliver the scheme and their associated costs. This is captured within the table below:

SLC Development Cost	£16,620,000
Internal staff costs - including LBB resources for project and programme management	£330,000
Legal costs - including land checks, contractual support etc	£50,000
Technical fees to support quality and cost control, governance and assurance (15% of construction)	£1,800,000
Estimated Project Total	£18,800,000

This is an early estimate and further clarity on total cost will be achieved and reported on as project planning develops and a Full Business Case is compiled.

7.7. Phasing and next steps

An indication of the annual capital requirements for the scheme is below and is to be updated as planning progresses.

FY 21/22	FY 22/23	FY 23/24	FY 24/25	TOTAL
£1.4m	£3.95m	£6.75m	£6.7m	£18.8m

Policy and Resources Committee (February 2021) approved the use of c£1.4m of CIL monies to progress the development of the programme which will be used to progress to Full Business Case.

This submission was approved and thus included within the capital programme and reported to Policy & Resources Committee (February 2021).

It is proposed that these monies will be used to:

- Develop the design produced as part of SLC's feasibility study, including architectural, landscaping and engineering design consultancy
- Develop project budget through cost estimates and valuation exercises
- Undertake market testing to establish approach to contractor and operator appointments
- Undertake further stakeholder engagement and develop site knowledge through required surveys and reports
- Finalise internal resourcing requirements to support programme, including governance arrangements and staffing appointments where necessary
- Develop documentation required and apply for outline planning permission to develop the site
- Develop tender documentation and engage with procurement to prepare for appointments of contractors following finalisation of approach

8. Project Approach

The below is a high-level summary of the project's key dates and milestones, allowing for procurement and planning approvals which will be required for the significant construction and development aspects of the programme.

It should be noted that the project team are currently working to identify and progress elements which can be prioritised and delivered in an accelerated fashion and as part of a phased delivery, to meet the immediate needs of residents in an area of significant growth.

Outline Business Case reported and approved	June 2021
Internal resources and governance arrangements finalised	July 2021
First technical appointments made	July 2021
Completion of site surveys and reports	October 2021
Developed design complete (RIBA 3)	March 2022
Outline planning application submitted	July 2022
Contractor procurement exercise undertaken	September 2022
Full business case approved	November 2022
Technical designs complete (RIBA 4)	January 2023
Approval of reserved matters	March 2023
Phased construction - start on site (RIBA 5)	June 2023
Leisure operator procurement complete	July 2023
Phased construction completes	Summer 2025
Leisure operator - mobilisation (RIBA 6)	Summer 2025

9. Project Assurance

9.1. Gateways

Gateway	Objectives / outcomes	Target
0	Concept phase; business case on a page to CSB.	2019

1	Initial assessment phase, end of RIBA 0 - feasibility studies and draft SOC	Complete early 2020
2	Full- Assessment phase (end of RIBA 1) Approve SOC. More detailed design and ready to spend money. Finalise Outline Business Case and approval to develop design and documentation to outline planning application.	Summer 2021
3	Design phase (RIBA stage 2 - 3) Approval to the Planning Application and approval to proceed with the second stage tender process, if required. Finalisation and Approval of the Outline Business Case.	Summer 2022
4	Construction phase (start of RIBA Stage 4) - Approval of the Full Business Case and Approval to proceed to construction.	Spring 2023
5	Pre-handover & Defects phase (RIBA Stage 5 - 6) – start of Defects & readiness to handover to end-user; acceptance of building/service; maintenance; contractor in place; all docs in place i.e. O&Ms. Draft Lessons Learned.	Summer 2025
6	Full Handover of Building/Service and end of defects – (end of RIBA 6) everything agreed from Gateway 5	Autumn 2025
7	Closure phase (RIBA Stage 7) – Handed over to Service for BAU management, transferred or closed out of Capital budget (Final Account) & Closure Report on file.	Summer 2026

9.2. Deliverables

Deliverable / Product	Author	Reviewers	Acceptor
Developed design	Architect / technical team	Technical Lead Project Manager AD: Capital Delivery AD: Greenspaces and Leisure Portfolio Lead - Capital Delivery	Via Gateway
Outline Business Case	Project Manager	AD: Capital Delivery AD: Greenspaces and Leisure Portfolio Lead - Capital Delivery Finance Business Partners Programme Board Capital Strategy Board	Policy and Resources Committee
Outline planning application	Architect / technical team / planning agent	Programme Board LBB Planning Greater London Authority	LBB Planning Greater London Authority
Reserved matters applications	Architect / technical team / planning agent	Programme Board LBB Planning Greater London Authority	LBB Planning Greater London Authority
Detailed design and works information	Technical team	Programme Board Main contractor	Via Gateway
Full business case	Project Manager	AD: Capital Delivery AD: Greenspaces and Leisure Portfolio Lead - Capital Delivery Finance Business Partners Programme Board Capital Strategy Board	Policy and Resources Committee
Sports Hub building	Main contractor	Technical Lead Project Manager	Via Gateway

		Programme Board AD: Greenspaces & Leisure	
Other site elements - including artificial pitches, landscaping work etc.	Main contractor - other contractors where appropriate	Technical Lead Project Manager Programme Board Service Manager: Greenspaces & Leisure	Via Gateway
Mobilisation plan	Appointed leisure operator	AD: Greenspaces and Leisure Programme Board G&L Board	AD: Greenspaces & Leisure

10. Dependencies

10.1. West Hendon Regeneration

The project interfaces with the West Hendon Partnership Board (WHPB), which brings together key stakeholders involved in the regeneration of the West Hendon Estate. The WHPB have been consulted during the development of the master plan for the site, as the project area adjoins the West Hendon estate. The project team have attended board meetings and will continue to provide feedback on the progress of the project.

10.2. Welsh Harp

The project interfaces with the Welsh Harp Joint Consultative Committee (WHJCC). The WHJCC is a consultation body of the London Boroughs of Barnet and Brent, set up to consider and co-ordinate all the interests of recreation/leisure /maintenance /nature conservation and the statutory requirements of the Canal and River Trust and the Environment Agency, at the Welsh Harp, with the object of protecting the Welsh Harp Reservoir and surrounding open land as a unique environment for both recreation and wildlife conservation. The WHJCC have been consulted during the development of the master plan for the site. The project team have attended committee meetings and will continue to provide feedback on the progress of the project.

10.3. Works at Cool Oak Lane

A planning application was validated on 8 January 2020 for land bordering the site at Woodfield Nursery, Cool Oak Lane, NW9 7NB reference 19/6696/FUL. The application is for demolition of existing structures and construction of 41 dwellings and reprovision of accommodation for a business. The interface with this application relates to the traffic movements around this development and the proposed traffic movements from the proposals in the master plan for Woodfield Park. A formal letter was received from those involved in this potential development during the public consultation on the final draft master plan. The letter wished to note their support for the master plan and the enhancement it would bring to the local area.

10.4. Brent Cross South

Finally, the project interfaces with the Brent Cross South development, particularly the works ongoing to develop Clitterhouse Playing Fields. Given its proximity, the Council is engaging with the project team to establish the requirements of both sites and ensure they do not conflict in their efforts to meet the needs of residents.

The facility mix for West Hendon has been specifically designed to meet the needs of the local catchment, including the 2000 new households which form part of the West Hendon regeneration scheme. Whilst Clitterhouse Playing Fields aims to provide an offer to a wider catchment area within north-west London.

Equally, efforts are being made to highlight any potential for efficiencies or opportunity to work jointly with the BXS team to add value to both schemes.

Further dependences are outlined below:

Interface/dependency	Actions/comments
Two workstreams - Capital delivery and operator procurement	The two workstreams, as outlined above, are dependent on each other - for example, the appointment of a leisure operator will need to be confirmed at an opportune time and will influence the detail of the design. Each project will have its own governance arrangements as the project progresses, with capital delivery and G&L engaging throughout.
Approach to procurement	The project's approach to key appointments will inform large parts of its management, including programme and budget. For example, a decision is required on how to procure a technical team and main contractor, and whether existing partnerships will be utilised.
Arrangements for existing leaseholders	The site's current leaseholders, including a nursery and bowls club, will need to be provided for during the works as well as afterwards. The bowls lawn, for example, will need to remain in situ for the duration and temporary facilities provided for the club, likely in the form of a modular building.
Funding	The business case for the scheme demonstrates that its viability is dependent on funding to limit the cost of borrowing. For example, the Community Infrastructure Levy is likely to be required to part-fund the scheme and ensure the revenue generated can service any debts incurred.
External grants	During feasibility stage, SLC identified a number of potential sources of external funding. In most cases, these are provided by National Governing Bodies for Sport (NGBs). The Council will need to ensure that the needs of this scheme is balanced with those of other priority projects, and any applications are mindful of the number of funding streams reaching the Council from a single source. Equally, any funding may have conditions attached to be considered, e.g. contractors and timescales.

11. Approach to Consultation

In the development of the feasibility study for the site, two phases of engagement were undertaken by SLC in 2018. The feasibility study is available on Barnet's Open Data Portal.

In March 2019 the meeting of the Environment Committee agreed that public and stakeholder consultation would be carried out on the draft master plan. SLC undertook this work in 2019, and the outcomes of the consultation were reported to the 12 March 2020 meeting of the Environment Committee. The full consultation report is available on Barnet's Open Data Portal.

In summary:

- The Council has successfully undertaken public consultation on the Final Draft Masterplan for West Hendon Playing Fields and engaged with over 900 local residents and stakeholders.
- Feedback has been provided through a variety of channels, including an online questionnaire, public drop-in sessions, resident meetings, telephone and email.
- The online questionnaire received 224 responses. 72% of respondents were supportive of the final draft Masterplan and 21% were unsupportive. The most popular ranked facilities were improved pedestrian routes, improved grass pitches, café and toilets, improved cycle routes and woodland nature trail
- The key areas of contention raised through the consultation were the proposed car park on Cool Oak Lane, the proposed location of the high ropes course, the artificial turf pitches and impact of these upon open space / biodiversity, the impact of proposed facilities on the SSSI/LNR and increased traffic and congestion.
- In response to the consultation, SLC has explored the option of relocating the car park and high ropes course to Woodfield Park, supported by consultation with key stakeholders. This has proven to be a feasible option and is welcomed by interested parties including Princes Park FC and Phoenix Canoe Club.

12. List of Strategies, Reports and Policy Documents

SLC Feasibility Study and Draft Masterplan

[West Hendon Playing Fields - Feasibility Study including the Draft Master Plan – Barnet Open Data](#)

SLC Addendum Report, Consultation Report and Draft Final Masterplan

[West Hendon Playing Fields – Addendum Report, Consultation Report and Draft Final Master Plan – Barnet Open Data](#)

Environment Committee 12 March 2020, Sports Hub Masterplanning Report and Supporting Documentation (Item 7)

[Agenda for Environment Committee on Thursday 12th March, 2020, 7.00 pm \(moderngov.co.uk\)](#)

Environment Committee 14 March 2019, Sports Hub Masterplanning Report and Supporting Documentation (Item 8)

[Agenda for Environment Committee on Thursday 14th March, 2019, 6.00 pm \(moderngov.co.uk\)](#)

Draft Playing Pitch Strategy

[Draft Playing Pitch Strategy 2017 – Barnet Open Data](#)

Parks and Open Spaces Strategy

[Open Spaces Strategy – Barnet Open Data](#)

Document Control

File path	West Hendon Playing Fields Business Case v1.0
Reference	West Hendon Playing Fields OBC
Version	V1.0
Date created	19 May 2021
Status	Final draft

Document History

Date	Version	Reason for change	Changes made by
27/04/21	0.1	Original draft	Ryan Mann
10/05/21	0.2	Revised draft	Ryan Mann / Charlie Parish
14/05/21	0.3	Draft with further revisions following discussions with MW/CB	Ryan Mann
19/05/21	1.0	Final draft	Ryan Mann

Distribution List:

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Matthew Waters	Assistant Director - Capital Delivery	28/04/21
Matthew Gunyon	Service Manager - Greenspaces	28/04/21
Geoff Mee	Executive Director - Environment	19/05/21

Approvals:

By signing this document, the signatories below are confirming that they have fully reviewed the Outline Business Case for the project and confirm their acceptance of the completed document.

Name	Role	Signature	Date	Version
Cllr Dan Thomas	Committee Chairman	Via Email	27.05.21	V1.0
Geoff Mee	Executive Director - Environment	Via Email	04.06.21	V1.0
Anjam Beg	Legal	Via Email	04.06.21	V1.0
Sharon Palma	Finance	Via Email	04.06.21	V1.0
Susan Lowe	Procurement	Via Email	28.05.21	V1.0
Maria Lugangira	Governance			

Enter the names and roles of the people who need to sign this document in order to show agreement with the business case's proposal, with space for them to sign it

¹ You should speak to your Head of Finance about any capital project you are proposing to undertake. They will help you to complete certain sections of the business case.

KEY

- Site Boundary

Existing Buildings

- Existing Buildings within the Site Boundary
- Existing Buildings outside of the Site Boundary
- Existing Bird Hide

Proposed Buildings

- Proposed New Building
- Proposed Adventure Golf Kiosk
- Proposed High-rope Kiosk (with toilet)
- Proposed Bird Hide

Access and Circulation

- Vehicular Entrance
- Pedestrian/Cycle Entrance
- Proposed Cycle & Pedestrian Routes (3m width)
- Proposed Pedestrian Routes (2m width)
- Capital Ring
- West Hendon Playing Fields Walking Route

Existing Hardworks

- Informal Gravel Paths
- Bitmac
- Existing Fencing
- Gate

Proposed Hardworks

- Proposed Full Construction Bitmac (Pedestrian Depth)
- Proposed Full Construction Porous Bitmac (Vehicular Depth)
- Proposed Rolled Gravel Surfacing
- Proposed Rubber Bound Mulch
- Proposed Coloured Bitmac
- Proposed Bridge Across Swale To Community Hub
- Proposed Concrete Setts/Block Paving
- Proposed KBI Flexi Pave
- Bodpave 85 Eco Grid with 18mm Angular Gravel Infill

Proposed Boundaries

- Proposed Rustic Timber fence (1.2m Height)
- Proposed Birdsmouth Fence
- Proposed 3.0m high Rebound Sports Fencing with Gated Entrance

Existing Parking

- Existing Standard Parking Bays 4.8m X 2.4m

Proposed Parking

- Proposed Standard Parking Bays 4.8m X 2.4m
- Proposed Accessible Parking Bays 6m X 3.6m

Proposed Drainage System

- Proposed Inspection Chambers

Existing Street Furniture

- Existing Street Furniture

Existing Lighting

- Existing Lighting

Proposed Street Furniture

- Picnic Benches
- Lighting Columns
- Low Level Path Lighting
- Proposed Bollards
- Proposed Timber Top Benches with Brick Faced Base
- Proposed Cycle Stand
- Proposed CCTV

Existing Soft Landscaping

- Brent Reservoir
- Trees to be Retained
- Existing Tree Groups with Scrub Vegetation Underneath
- Grass
- Improved Grassland

Proposed Soft Landscaping

- Proposed Trees
- Orchard Planting
- Proposed Structure Planting
- Proposed Wildflower Planting
- Proposed Ornamental Planting
- Proposed Marginal Planting
- Proposed Artificial Turf
- Proposed Hedge
- Proposed Enhancement to Existing Hedgerow
- Proposed Mounding 0.5m Intervals (1:6 Gradient)
- Proposed WSUDS (Water Sensitive Urban Design) Negative Contours
- Proposed Open Swale from Outlet to Existing Outfall (0.5m Intervals / 1 in 3 Gradients)



Proposed Facilities

- 1 Adventurous Play Area
- 2 Multi-Use Games Area
- 3 Toddler Play
- 4 Community Sports Hub
- 5 Adventure Golf Course
- 6 Community Garden
- 7 Bowls Green
- 8 Tennis Courts
- 9 High Ropes Area
- 10 Skate / BMX Park
- 11 Outdoor Gym
- 12 Orchard

Existing Parking Areas

- 1 Existing Standard Parking Spaces: 45
Total 45
- Existing Standard Parking Spaces Retained: 45
Total 45
- New Standard Parking Spaces: 30
Total 30

Proposed Parking Areas

- 1 Proposed Standard Parking Spaces: 58
Proposed Accessible Parking Spaces: 4
Total 62
- 2 Proposed Standard Parking Bays: 94
Total 94

TOTAL SPACES 156nr
OVERALL SPACES 231nr

Proposed Sports Pitches Provision

- 1 Pitch Area excluding Run-off

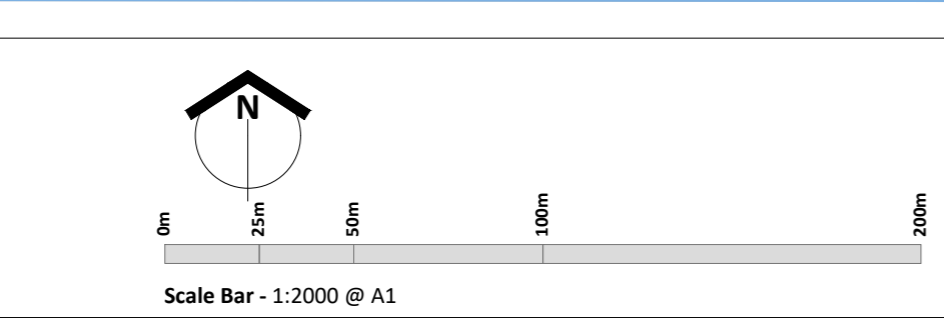
Football Pitches

- 1 Full-size artificial turf pitches 100m x 64m plus 6m run off
- 2 Adult grass pitches 100m x 64m plus 6m run off
- 3 11 v 11 junior (U13/14) grass pitch 82m x 50m plus 6m run off
- 4 9 v 9 junior grass pitch 73m x 46m plus 6m run off
- 5 7 v 7 junior grass pitch 55m x 37m plus 6m run off
- 6 5 v 5 junior grass pitch 37m x 27m plus 6m run off

Notes

- Please Refer To:
 - 1089_260_WH_Drainage + Earthworks Strategy
 - 1089_262_WH_Access and Circulation Plan

Rev.	Description	By.	Chk.	Date.
A	Amended following Phase 2 Engagement	SH	EG	17.01.19
B	Amended following SLIC comments	SH	EG	18.01.19
C	Graphic error corrected	SH	EG	21.01.19
D	Missing orchard symbol added	SH	EG	25.01.19
E	Amended following consultation	SH	EG	03.09.19
F	Amended to include Woodfield Park	JR	SG	14.11.19
G	Amended following SLIC comments	JR	EG	19.12.19
H	Amended following meeting London Borough / SLIC	JR	SG	15.01.20



1089 West Hendon Playing Fields

Drawing Issue Status

Comment / Approval	Construction
Costing	Record Draw
Planning	BM
Tender	

SLC
Detailed Draft Masterplan

1089_250
1:2000 @ A1

Rev H
25.06.18
NW9 7HE

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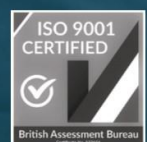
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Masterplan and Feasibility Study for West Hendon Playing Fields and Associated Community Facilities

Barnet Council

February 19



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EXECUTIVE SUMMARY

1. The Sport, Leisure and Culture Consultancy (SLC) has been commissioned by Barnet Council to develop a masterplan and feasibility study for the development of a strategic sports hub with a wider leisure and community offer at West Hendon Playing Fields. SLC is a specialist adviser supporting local authorities and other organisations in developing strategic and sustainable solutions for sport, leisure and cultural facility developments.
2. The masterplan and feasibility study will contribute to the delivery of a series of key strategic documents designed to shape the delivery of sport and physical activity services and facilities in parks and open spaces across the Borough. These include the Playing Pitch Strategy (2017), the Parks and Open Spaces Strategy (2016-2026), the Joint Health and Wellbeing Strategy (2015-2020) and the Fit and Active Barnet Framework (2016-2021). These documents are underpinned by a commitment within the Council's Corporate Plan (2015-2020) that 'Barnet's parks and open spaces will be amongst the best in London.'
3. West Hendon Playing Fields is an important and reasonably well used sporting, recreation and community resource with strong links to adjacent areas of significant ecological interest. The site currently provides a series of outdoor and indoor facilities to support existing sports clubs. The football pitches are used by six local teams and the Council-owned pavilion is occupied, through separate tenanted areas, by the Chin Woo Martial Arts Club and Hendon Bowls Club. The pavilion also hosts Parkside View Nursery which is well used by the community and helps meet local demand for children's nursery places.
4. The playing fields and wider site has strong ecological interest being located adjacent to the Welsh Harp / Brent Reservoir, a designated Local Nature Reserve and Site of Importance for Nature Conservation. The site also forms a buffer zone to the Welsh Harp / Brent Reservoir which is a designated Site of Special Scientific Interest (SSSI), providing a vital habitat for wildlife.
5. The current site is unwelcoming, appears unloved and is characterised by rundown built infrastructure, poor quality facilities, poor access and circulation routes and an overarching lack of identity. It is made up of a series of unconnected functions operating in isolation and with an apparent lack of overall site management. This has resulted in a disparate, disjointed and incoherent offer.
6. Despite the weaknesses of the current site, there are clear opportunities to develop facilities and services which not only meet local need for improved sports and community facilities but exploit the unique nature and location of the site, particularly linked to its SSSI designation. As well as developing a new sports hub and community facilities for local residents, there is a clear opportunity to improve basic pedestrian and cycle route connections to and around the wider site. There is a prospect of providing a 'destination offer' which attracts visitors from further afield.
7. Phase 1 of SLC's commission included a comprehensive Options Appraisal to understand the local need for facilities and services and to explore development opportunities which meet this identified need and contribute strongly to the Council's strategic objectives.
8. The report on Phase 1: Options Appraisal is provided in Appendix 1 and a summary of the key conclusions arising from it is provided below:

- a. SLC's review of the Council's key strategic documentation together with the assessment of the current condition of facilities and operation of West Hendon Playing Fields has helped to identify clear requirements for improved sports, leisure and community facilities.
- b. SLC's widespread engagement with key stakeholders including Council officers, National Governing Bodies of sport, key users/occupiers, local stakeholders and the wider general public has further informed the preferred facility development options.
- c. A supply and demand analysis has supplemented the strategic review and stakeholder engagement and identified market potential for additional complementary facilities to help diversify the offer and support the overall financial sustainability of the site.
- d. A long list of potential facility development options has been identified through the strategic review, stakeholder engagement and supply and demand analysis. This long list has then been prioritised in consultation with the Council.
- e. The prioritised long list of options (shown in Table E1) will be used as the basis of the facility mix to take forward to Phase 2: Masterplanning.
- f. The development of Phase 2: Masterplanning will need to carefully consider and mitigate the planning constraints linked to the site's designation as Metropolitan Open Land and the SSSI status of the wider site.
- g. Due to the spatial requirements and planning constraints for developments which are to be explored through Phase 2, those options which are considered to be a lesser priority may need to be excluded from the final facility mix.

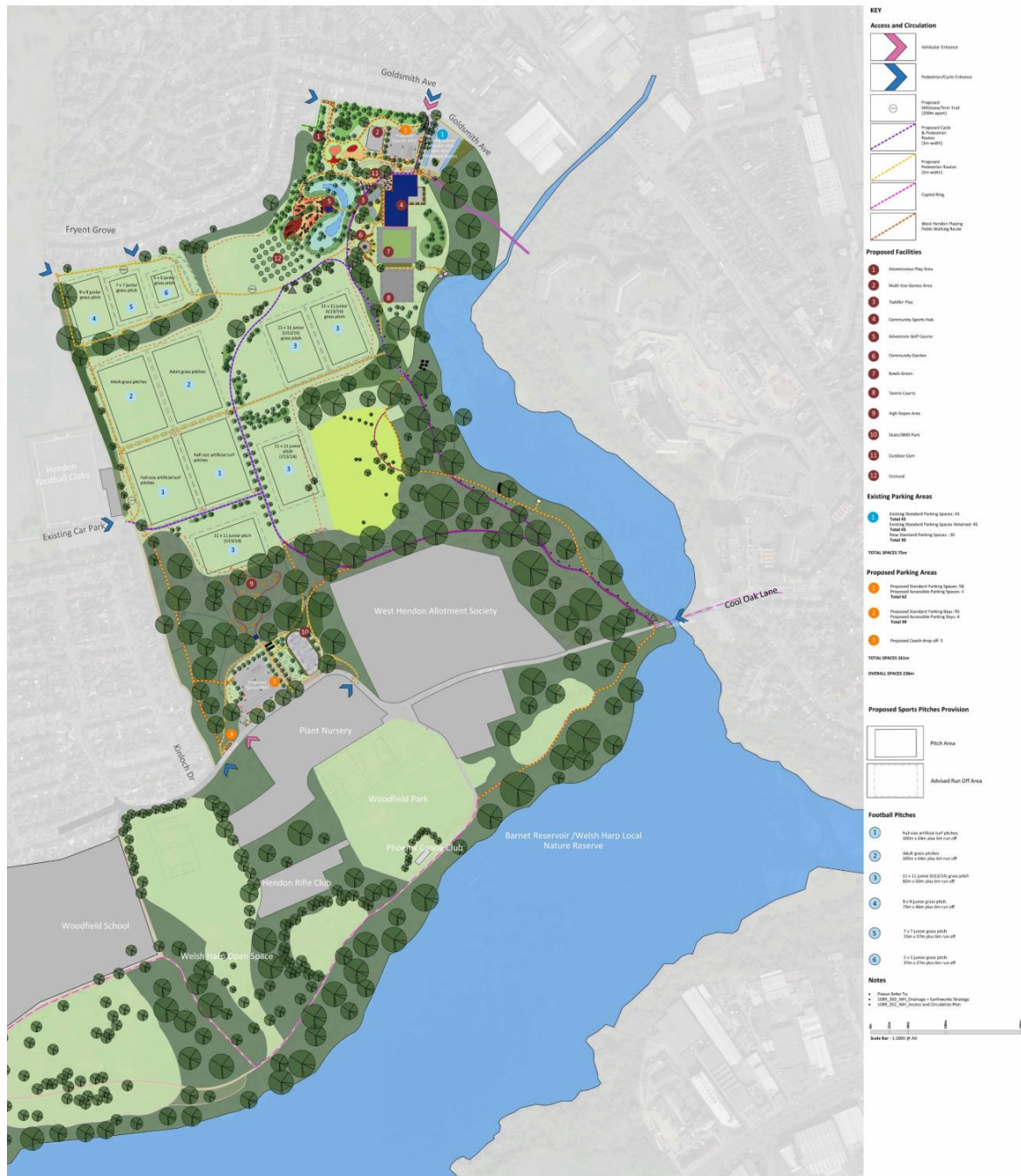
Table E1: Summary Evaluation of Facility Development Options

Facility Development Option	Priority Rating	Summary rationale
Outdoor Facilities		
New, improved and reconfigured football pitches	High	Core provision for the new sports hub. Pitches to be configured as per PPS.
New 3G Artificial Turf Pitches (ATP)	High	Core provision for the new sports hub and strong income generator. 2 x floodlit 3G ATPs.
Multi-Use Games Area (MUGA)	High	Replaces ball court lost from West Hendon estate and provides a year-round hard court for free access recreational activity. Planning condition.
Refurbished Tennis Courts	High	Improves existing provision and diversifies sporting offer on site.
Wheeled Sports Facility – Skatepark, BMX	Medium to High	Evidence of demand for facilities for local young people but needs to be considered strategically linked to other schemes e.g. Montrose and Copthall.
Bowling Green	High	Desire to retain bowls provision if feasible.
New Play Areas	High	Core provision. Replaces existing and provides essential free access play opportunities. Design should explore more adventurous play for older children.
New Outdoor Gym and Trim Trail	High	Provides opportunities for informal, free access to fitness facilities at relatively low capital cost.
Improved pedestrian and cycle routes	High	Critical to success of overall scheme. Strong requirement to provide pedestrian and cycle route loop to connect WHPF with West Hendon estate.
Adventure Golf	High	Contributes to a ‘destination’ type offer and good revenue generator.
High Ropes	High	Contributes to a ‘destination’ type offer and good revenue generator.
Woodland Nature Trails	High	Capitalises upon ecological interest of SSSI and very popular choice through public engagement questionnaire.
Community Garden (Green Gym)	High	Low cost development with high social and community benefit. Provides alternative physical activity and helps mental wellbeing.
Sensory Garden	Medium	Creation of a designated sensory garden considered a lesser priority, but elements of sensory design should form part of overall site masterplan e.g. play areas, community garden, woodland nature trails etc.
Picnic Areas	Medium to High	Low cost option that will encourage longer dwell time and capitalise upon ecological interest and waterside location.

Facility Development Option	Priority Rating	Summary rationale
Indoor Facilities		
Café	High	Provides a central focal point and supports the proposed facilities and activities on site. Identified as the most popular option through the public engagement and one which will strengthen the overall revenue position.
Facilities for Hendon Bowling Club	High	Desire to retain bowls provision if feasible. Indoor ancillary facilities essential to support club operation.
Multi-use activity space (exercise classes, martial arts, boxing, gymnastics etc.)	High	Core provision for new sports hub. Established existing use (martial arts) and high demand for flexible indoor activity space. Would help strengthen overall revenue position.
Softplay	Medium	Provides additional income stream and supports the café but local competition may limit its appeal.
Clip and Climb (indoor climbing)	Medium	Contributes to more of a 'destination' offer and a good income generator but may conflict with alternative planned provision.
Community rooms / educational space	High	Would complement remaining but potentially reduced community space on WH estate and provide space for voluntary sector groups and schools, possibly linked to ecological interest of SSSI.
Nursery	High	Strong demand for nursery provision demonstrated by existing facility. Would provide a sustainable income stream to aid overall financial sustainability of site.
Changing accommodation	High	Core provision for the new sports hub - supports outdoor pitches.

9. Having established an optimal mix of facility developments that is consistent with the Council’s brief of developing a strategic sports hub with a wider leisure and community offer, a RIBA Stage 2 initial draft masterplan and accompanying building layout drawings were subsequently developed to include:
- A new Community Sports Hub to include the following facilities:
 - Café
 - Clip and Climb facility
 - Soft play
 - 2 x multi-activity studios
 - 2 x community rooms
 - Children’s nursery
 - Facilities for Hendon Bowling Club
 - Changing rooms and toilets.
 - Improved and reconfigured grass football pitches
 - 2 x 3G Artificial Turf Pitches (floodlit)
 - Multi-Use Games Area (floodlit)
 - Replacement Tennis Courts
 - Wheeled Sports Facility – Skatepark, BMX
 - Bowling Green
 - Adventurous and Toddler Play Areas
 - Outdoor Gym and Trim Trail
 - Improved pedestrian and cycle routes
 - Adventure Golf Course
 - High Ropes Course
 - Woodland Nature Trails
 - Community / Sensory Garden
 - Picnic Areas.
10. An indicative programme of use has been developed by SLC to inform the parking requirements for the current and proposed additional facilities. This exercise has identified a requirement for 274 spaces during peak times. The 236 spaces in the draft masterplan are therefore not sufficient to meet the maximum number of cars projected through the programme of use. It will therefore be essential that the Council explores opportunities for a network of more sustainable transport routes to the site through improved cycle and pedestrian routes and connections from the surrounding areas and through improved public transport links.
11. The initial draft masterplan showing the facilities listed above is shown in Figure E1 and full versions provided in Appendix 2.

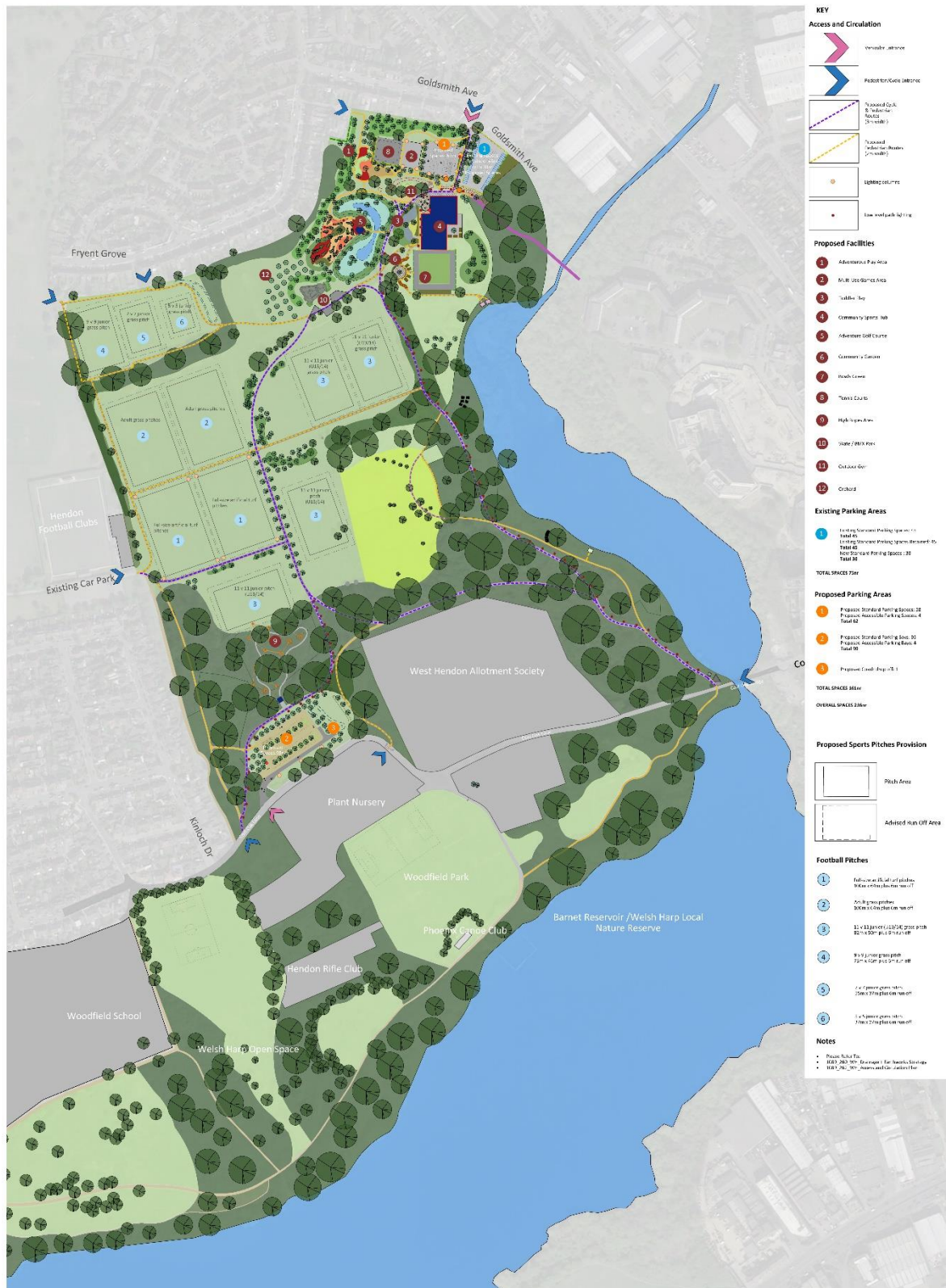
Figure E1: Initial Draft Masterplan



- Following on from the initial engagement undertaken with current users and occupiers, wider stakeholders and the general public during Phase 1: Options Appraisal, SLC undertook further engagement with the same groups on the initial draft masterplan developed during Phase 2.
- Feedback from this further engagement showed strong overall support for the scheme with 86% of respondents to the online survey being supportive or very supportive of the initial draft masterplan.
- Through this engagement, concerns were raised by local conservation groups and residents regarding the impact of development upon the SSSI designation and Local Nature Reserve.

15. These concerns have been considered by SLC and the Council and subsequent amendments made to the draft masterplan as a result. These amendments include an increased floor area for the nursery and the relocation of the proposed new tennis courts to the north of the site and the wheeled sports facility to a more central location. In addition, the new car park on Cool Oak Lane has been 'softened' through use of a more permeable, natural surface finish and additional planting and low-level lighting has been included on the pedestrian/cycle route from this car park to improve safety.
16. The final draft masterplan for the site, incorporating these amendments is shown in Figure E2 and full versions provided in Appendix 2.

Figure E2: Final Draft Masterplan



17. SLC, through its specialist leisure Cost Consultants, Castons, has developed elemental budget estimates for each of the facility developments and the overall site masterplan as shown in Table E2. These estimates have been informed by an indicative delivery programme designed to

provide the Council with an expected overall timeframe for design, planning consent and construction and to inform an assumed position regarding the cost of inflation.

Table E2: Facility Developments Budget Estimate (Q4 2018)

Facility Options	Development Cost Estimate
Indoor Facilities	
Community Sports Hub (incl. temporary facilities)	£4,726,000
Outdoor Facilities	
2 x 3G ATPs	£1,800,000
Grass Pitches	£200,000
MUGA	£145,000
Tennis Courts	£160,000
Wheeled Sports Facility	£580,000
Adventurous Play Area	£460,000
Toddler Play Area	£70,000
Adventure Golf Course	£295,000
High Ropes Course	£370,000
Outdoor Gym and Trim Trail	£150,000
Demolition, External Works and Landscaping	£3,126,000
Sub total	£12,082,000
Contingency (10%)	£1,208,000
Professional fees, surveys and Furniture, Fittings & Equipment (FFE)	£1,337,000
Inflation to construction midpoint (Q4 2022)	£3,070,000
TOTAL DEVELOPMENT COST	£17,697,000

18. The construction costs of all developments within the draft masterplan are estimated to be c.£12.1M. The contingency, professional fees and fit out costs are estimated to be c. £2.5M and the cost of inflation based upon a mid-point of construction of Q4 2022 is estimated to be c.£3.1M. **The total overall development cost of delivering the masterplan is c.£17.7M.**
19. High-level business plans using industry benchmarked financial ratios have been developed to support the business case for investment. **Over a 10-year period, it is projected that an average annual revenue surplus of £405,000 would be generated by delivering all of the facilities included in the draft masterplan for the site.** Any changes to the final facility mix or phasing of delivery will impact upon this figure. Given the projected timescales for delivery, the business plan will need to be regularly reviewed at different stages of the project to take account of any changes in the market.
20. The business plan illustrates the relative strengths of each facility development in terms of financial performance. As shown in Table E3, all developments, apart from the grass football pitches, are projected to generate a revenue surplus. The Artificial Turf Pitches and Adventure Golf Course provide the strongest return followed by the High Ropes Course, Clip and Climb and Multi Use Activity Studios.

Table E3: 10-year Average Business Plan Summary

Facility	10-year average Surplus / (Subsidy)
Grass Football Pitches	-£27,591
ATPs	£159,454
Tennis Courts	£1,439
Café	£19,162
Nursery	£32,302
Community Rooms	£28,752
Multi-Use Activity Space	£83,784
Clip n Climb	£85,620
Soft Play	£27,301
Adventure Golf	£150,363
High Ropes	£87,566
Grounds Maintenance Costs	-£54,749
Central Support Costs	-£107,495
Operator Profit	-£80,622
Whole Site Masterplan	£405,286

21. There are a number of potential grant funding sources available to the Council and other stakeholders. Each of these have specific criteria to meet and most are worthy of further exploration as the masterplan develops through detailed design stages. However, it is not possible at this stage to assess the Council's likely chances of success.
22. In considering options for the future management of facilities at West Hendon Playing Fields, the Council will need to ensure a strong and sustainable revenue position and the delivery of high-quality facilities and services. SLC has identified a number of different potential management models for consideration by the Council and highlighted some of the advantages and disadvantages of each.
23. Based on a set of financial and non-financial criteria agreed with the Council, SLC's initial evaluation of management model options has revealed that commissioning an external leisure operator (or operators) to manage the site would be the optimal approach. This would likely be on the basis of a management contract, supported by a detailed services specification which links directly to the Council's strategic priorities and contributes strongly to its strategic outcomes.
24. The key recommendations arising from the feasibility study and masterplanning process are as follows:
 - a. The Council should note the findings of the masterplan and feasibility study and consider taking the scheme forward to the next stage of consultation.
 - b. The Council should formally engage with Natural England and other statutory planning consultees e.g. Canal and River Trust, Environment Agency, during the next stage of consultation, to fully understand the potential constraints of development linked to the Welsh Harp, SSSI and Local Nature Reserve.

- c. The Council should develop an outline funding strategy to explore options for delivery of the proposed masterplan.
- d. The Council should work with partners to explore opportunities for developing a network of more sustainable transport routes to the site through improved cycle and pedestrian routes and connections from the surrounding areas and through improved public transport links.

1 INTRODUCTION

1.1 Background

1.1.1 Barnet Council has in recent years, developed a series of key strategic documents designed to shape the delivery of sport and physical activity services and facilities in parks and open spaces across the Borough. These include a Playing Pitch Strategy (2017), a Parks and Open Spaces Strategy (2016-2026) and the Fit and Active Barnet Framework (2016-2021). The documents are underpinned by a commitment within the Council's Corporate Plan that 'Barnet's parks and open spaces will be amongst the best in London.'

1.1.2 The Council is seeking to implement some of the recommendations made by these strategies by exploring the development of new sports hubs at three identified strategic sites – Barnet Cophthall, West Hendon Playing Fields and Barnet / King George V Playing Fields.

1.1.3 West Hendon Playing Fields (WHPF) is located in the south-western corner of the Borough and shares a boundary with the London Borough of Brent. It lies adjacent to the Welsh Harp reservoir, a Site of Special Scientific Interest (SSSI), and is designated as Metropolitan Open Land.

1.1.4 Section 106 contributions arising from the regeneration of the adjacent West Hendon estate have presented an opportunity to improve the facilities on the playing fields and surrounding areas with the aim of promoting and increasing participation in sport and physical activity in the locality and raising the profile of the SSSI.

1.2 Our Terms of Reference

1.2.1 The Sport, Leisure and Culture Consultancy (SLC), together with associates Southern Green Landscape Architects and Paul Weston Architect, have been appointed by the Council to develop a detailed masterplan, accompanied by a feasibility report.

1.2.2 The key requirements of the project brief are as follows:

- An Options Appraisal which explores potential facility development options and is supported by evidence from desktop analysis and research and consultation with a range of key stakeholders.
- A subsequent site masterplan and concept designs to RIBA Stage 2 showing the development of identified options including consideration of the impact upon ecology and wildlife and an exploration of flood risk.
- An accompanying feasibility study which provides details of the development costs and the identification of potential funding partners, high-level business plans to inform the future revenue position and an outline plan for the implementation of the masterplan.
- An appraisal of potential future management model options including consultation with selected key stakeholders.

1.2.3 The key issues and opportunities identified by SLC to be addressed in response to the project brief and through subsequent discussion with the Council are as follows:

- The Council has an exciting opportunity to develop a strategic sports site which not only meets the current and future requirements of established sports users but also creates a new 'destination' offer for this part of the borough that attracts new users and visitors.
- The site is designated as Metropolitan Open Land with significant planning constraints.

- The Council are seeking a minimum of a revenue neutral position for future operation of the site and so the development options will need to provide for income generating activities.
- WHPF is currently unloved and lacks identity. The masterplan should explore opportunities for investment into sports and community facilities which are ‘ambitious but not unrealistic’ and provide a stronger, more coherent identity for the site.
- The Council recognises that the new leisure facilities should be based on need and complement other local facilities.
- Engagement with a range of local stakeholders will be critical to ensuring the future success of the site. The adjacent West Hendon regeneration scheme has been highly contentious and local residents need to play a strong role in helping to determine future development of the playing fields.
- There is a lack of connection between the WHPF site, the adjacent Welsh Harp and the West Hendon estate.
- Any potential developments for new facilities or improved site connections will need to consider the impact on the ecology and wildlife of the SSSI.
- There is a requirement to identify suitable models for future operation of the site which protects investment, provides a sustainable revenue position and develops a co-ordinated and joined-up approach to management.

1.3 The Structure of our Report

1.3.1 The remaining sections of this Feasibility Study report have been structured to meet the requirements of this element of the wider project brief.

Table 1: Report Structure

Section	Key Content or Output	
2	Options Appraisal	Summary of Phase 1: Options Appraisal report including recommended facility mix
3	Design Development	Block plans, layouts and sketch visuals of developments
4	Initial Draft Masterplan	Draft masterplan showing facility locations, landscaping, additional parking, access routes etc.
5	Stakeholder and Public Engagement	Feedback on draft masterplan from key stakeholders and wider community
6	Final Draft Masterplan	Final draft masterplan incorporating amendments following feedback from key stakeholders and wider community
7	Development Costs and Delivery Programme	Budget cost estimates and delivery programme
8	Business Planning and Funding Sources	Business planning exercise of proposed facility options and potential funding options
9	Management Options	Identification and evaluation of potential management models for the site
10	Delivery Plan	Implementation plan for delivery of the masterplan
11	Conclusions and Recommendations	Conclusions from feasibility study and masterplanning and recommendations for the Council

1.3.2 Supporting information is included in a series of Appendices.

2 OPTIONS APPRAISAL

2.1 Introduction

2.1.1 This section summarises the key findings from Phase 1: Options Appraisal.

2.1.2 Phase 1: Options Appraisal assessed the current site and explored a long list of potential facility development options. The results of the Options Appraisal informed the establishment of a facility mix to be developed through Phase 2: Masterplanning which is explored in subsequent sections of this report.

2.2 Site Analysis

2.2.1 WHPF is an important and well used sporting, recreation and community resource with strong links to adjacent areas of significant ecological interest. However, the site is unwelcoming, appears unloved and is characterised by rundown built infrastructure, poor quality facilities, poor access and circulation routes and an overarching lack of identity. It is made up of a series of unconnected functions operating in isolation and with an apparent lack of overall site management. This has resulted in a disparate, disjointed and incoherent offer.

2.2.2 Despite the obvious weaknesses of the current site, there are clear opportunities to develop facilities and services at WHPF which not only meet local need for improved sports and community facilities but exploit the unique nature and location of the site. As well as developing a new sports hub and community facilities for local residents, there is a clear opportunity to improve basic connections to and routes around the wider site. In addition, there is the prospect of providing a 'destination offer' which attracts visitors from further afield.

2.3 Needs Analysis

Supply and Demand Assessment

2.3.1 WHPF provides a series of well-used outdoor and indoor facilities to support existing sports clubs. The football pitches are used by six local teams and the Council-owned pavilion is occupied, through separate tenanted areas, by the Chin Woo Martial Arts Club and Hendon Bowls Club. The pavilion also provides a nursery facility which is well used by the community and helps meet local demand for nursery places.

2.3.2 The Playing Pitch Strategy (PPS) identifies the need for the existing grass football pitches to be retained and improved but reconfigured to meet the current and future need for more junior sized pitches. The PPS also identifies demand for additional 3G ATP provision and WHPF has been identified as a preferred site for 2 full-size 3G ATPs. This position is supported by Middlesex FA.

2.3.3 SLC's supply and demand analysis of new, additional facilities showed good market potential for indoor activities such as a youth-focused climbing offer and new outdoor activities such as a wheeled sports facility, Adventure Golf course and High Ropes course.

2.3.4 The overall findings of the supply and demand assessment are summarised in Table 2 using a Red/Amber/Green rating (with Red being negative and Green being positive).

Table 2: Summary of supply and demand assessment

Activity	Demand	Supply	Overall Assessment
Health and Fitness	A strong and growing market. Above average levels of 20-24, 24-29, 30-34 year olds likely to lead to high levels of demand.	A significant number of competing facilities.	There is an oversupply of 239 stations (current) and 192 (future – 2033) and therefore no unmet demand for additional facilities.
Soft Play	Above average levels of under 9's suggests high levels of demand.	Large local competitor at Brent Cross. Otherwise limited supply identified within catchment.	Reasonable market potential. Could be a small, community-based offer.
Indoor Climbing	Above average levels of under 9's and average proportion of 10-14 year olds and 15-19 year olds suggests relatively high levels of demand.	Two identified facilities close to WHPF in the catchment area, but of different scale and target market.	Good market potential for a climbing facility which focuses on the younger market through an easy to use 'Clip and Climb' or bouldering offer rather than catering for more serious climbers.
Wheeled Sports Facility	Above average levels of under 9's and average proportion of 10-14 year olds and 15-19 year olds suggests relatively high levels of demand.	Only one skate park in the Borough – small and beginner only. However, plans to develop skate park provision at Montrose Park and Cophthall.	Good market potential currently, especially on a site linked to large regeneration scheme and would help provide a coherent youth offer. Will need to be considered alongside other potential future provision locally.
BMX track	Above average levels of under 9's and average proportion of 10-14 year olds and 15-19 year olds suggests relatively high levels of demand.	One facility in the catchment but plans to develop a track as part of Cophthall masterplan.	Good market potential currently, especially on a site linked to large regeneration scheme. Will need to be considered alongside other potential future provision locally.
Adventure Golf	Above average levels of under 9's and average proportion of 10-14 year olds and 15-19 year olds suggests relatively high levels of demand.	Some limited provision on northern edge of catchment area, but no identified facilities in the south of the catchment or surrounding areas.	Good market potential. There is alternative provision in the north of the catchment, but a good quality offer would still attract users, particularly from the area to the south of the site.

Activity	Demand	Supply	Overall Assessment
High Ropes	Above average levels of under 9's and average proportion of 10-14 year olds and 15-19 year olds suggests relatively high levels of demand.	No competing provision within catchment. Nearest comparable facilities are 8-10 miles away.	Good market potential. Could provide 'destination' offer on a unique location.
3G Artificial Turf Pitches	Demand for additional provision identified in the PPS and consultation with Middlesex FA has confirmed this.	Some competing provision locally.	Good market potential and WHPF identified through the PPS as preferred site for 2 x 3G ATPs.

Initial Stakeholder Engagement

- 2.3.5 Initial engagement was undertaken with a number of key stakeholders from Barnet Council, National Governing Bodies of Sport (NGBs) and current users/occupiers of the site to inform the assessment of the long list of potential facility options for WHPF.
- 2.3.6 This initial engagement was carried out through a combination of face-to-face meetings and telephone calls. It was designed to build a clear understanding of the challenges and demands presented by the site and its current operation and to identify future opportunities to overcome these and to provide new and improved facilities through the development of a masterplan for WHPF.
- 2.3.7 The stakeholder engagement identified strong demand for café provision and for multi-use indoor space which can provide capacity for a range of activities such as martial arts, boxing, gymnastics, exercise classes, dance and outreach programmes.
- 2.3.8 In addition, the stakeholder engagement and review of the site revealed the importance of providing free to access facilities such as enhanced play areas, an outdoor gym and trim trail and improved and extended pedestrian and cycle links. These were seen as being very important in providing zero-cost opportunities for 'informal' physical activity.
- 2.3.9 Finally, the needs analysis work highlighted a desire amongst stakeholders to promote the ecological interest of the site through improved site information and interpretation.

2.4 Options Generation

- 2.4.1 A long list of facility development options was generated by SLC following a review of strategic documentation, current operation, stakeholder engagement, supply and demand analysis and through industry knowledge of sports hub and park developments.
- 2.4.2 Some of these options were identified as core provision for a new sports hub because they are a central function and a direct requirement of the Council's brief. These options include:
- Improved and reconfigured football pitches
 - 3G Artificial Turf Pitches
 - Multi-Use Games Area (MUGA)
 - Play areas
 - Café provision
 - Changing accommodation to support pitches.

- 2.4.3 Other options were identified as they are existing facilities on site which have potential to be re-provided as part of newly developed, improved and enhanced facilities. These options include:
- Tennis courts
 - Bowling club facilities
 - Pedestrian / cycle routes
 - Indoor activity space
 - Nursery.
- 2.4.4 Further development options were identified as additional, complementary facilities which would diversify and extend the site offer, provide opportunities for increased income and / or community engagement and education and seek to create more of a 'destination' for WHPF. These options included:
- Wheeled sports facility
 - Outdoor gym and trim trail
 - Adventure Golf
 - High Ropes course
 - Woodland nature trails
 - Community garden and sensory garden
 - Picnic areas
 - Softplay / Indoor climbing
 - Community rooms / educational space.
- 2.4.5 The full long list of facility development options together with notes describing each option is provided in Table 3.

Table 3: Long list of facility development options

Facility Development Option - Outdoor	Notes
Improved and reconfigured football pitches	Reconfiguration and improvement of grass football pitches in accordance with the recommendations of the council's Playing Pitch Strategy (PPS.) 2 adult pitches, 4 x junior 11v11, 1 x junior 9v9 and 1 x junior 7v7 and 1 x 5v5.
3G Artificial Turf Pitches	2 x full-size floodlit 3G ATPs in accordance with the PPS. Pitch markings to allow for small-sided and junior football.
Multi-Use Games Area (MUGA)	A hard court space suitable for year-round use to support different sports and activities including netball, basketball, 5-a-side football.
Refurbished Tennis Courts	Refurbish existing tennis courts.
Wheeled Sports Facility – Skatepark, BMX	Purpose-built facility for skateboarding, scootering and BMX.
Bowling Green	6-rink grass bowling green for use by Hendon Bowling Club.
Play Areas	A mixed play offer which is appealing to both younger and older children through the development of more adventurous play facilities.
Outdoor gym and Trim Trail	Free to access purpose-built outdoor exercise equipment. Outdoor gym consists of grouped fitness stations in a designated area. Trim trail consists of a 'trail' of fixed equipment designed to assist with 'calisthenic' training.
Pedestrian and cycle routes	Combined pedestrian and cycle routes through and around the site to improve connectivity and physical activity opportunities.
Adventure Golf	Mini golf course (putting) with fun design and obstacles. Appealing family offer which can be 9-hole or 18-hole.
High Ropes	Challenging outdoor activity consisting of a 'course' of high-level platforms linked by different roped access routes designed to test climbing and traversing skills. 'Adrenaline' offer popular with older children and adults.
Woodland Nature Trails	A trail designed to stimulate interest and awareness of the natural environment. Supported by signage and interpretation and often a printed quiz/challenge for children to complete.
Community Garden (Green Gym)	A plot of land gardened by a group or community. Can be used to support 'Green Gym' initiatives designed to promote physical activity amongst people who are less interested in traditional sport or fitness activity. Provides mental wellbeing benefits through group interaction and connection with nature.
Sensory Garden	A garden environment designed to stimulate different senses through use of colour, sound and smell. Especially beneficial to those who have sensory processing issues, including autism and other disabilities.
Picnic Areas	Designated areas in selected locations to encourage longer dwell time on site.

Facility Development Option - Indoor	Notes
Café	Café with capacity for 50-60 covers. Includes public toilets.
Facilities for Hendon Bowling Club	Ancillary facilities to support bowling club operation. Includes bar and lounge area, access to kitchen facilities and changing/toilet provision.
Multi-use activity space (exercise classes, martial arts, boxing, gymnastics etc.)	Studio type space designed to provide flexibility to cater for different uses.
Soft play	Indoor adventure play area for children.
Clip and Climb (indoor climbing)	A fun and accessible indoor climbing facility for children and adults. Consists of a variety of colourfully designed individual climbing challenges, with traversing and 'drop' slides.
Community rooms / educational space	Flexible meeting space for community and voluntary sector groups and schools.
Nursery	Purpose-built day nursery provision with capacity for 50 children.
Changing accommodation	Suitable changing provision to support sports facilities on site.

2.5 Wider Stakeholder Engagement

- 2.5.1 Engagement was subsequently undertaken with wider stakeholders and the general public to seek feedback on this long list in order to further inform the Options Appraisal.
- 2.5.2 The wider stakeholder engagement consisted of telephone calls and meetings with key stakeholders, including attending the West Hendon Regeneration Partnership Board and a public online questionnaire which was publicised on the Council’s consultation platform, Engage Barnet. The questionnaire was also sent out to consultees involved in the initial engagement, current users, local sports clubs and identified organisations who may have an interest in the future development of WHPF. The online questionnaire was available for three weeks from 14 May – 3 June 2018 and generated a total of 219 responses.
- 2.5.3 Overall, the wider stakeholder engagement provided good levels of engagement with local people and was extremely useful in capturing the views and opinions of local people on the current site offer and providing an indication of preferences from the long list of potential facility development options.
- 2.5.4 There was a clear desire to improve the provision of facilities and activities on WHPF but balanced with concern regarding anything that would impact negatively upon the peaceful nature of the site and the wildlife habitats.
- 2.5.5 From the long list of options, the outdoor facility options that were most favoured by stakeholders were as follows:
- Improved pedestrian routes
 - Woodland nature trail
 - Picnic areas
 - Improved sports Pitches
 - 3G Artificial Turf Pitches
 - Outdoor gym / trim trail.
- 2.5.6 From the long list of options, the indoor facility options that were most favoured by stakeholders were as follows:
- Café including toilets
 - Multi-use activity space
 - Community rooms / educational space.
- 2.5.7 The process provided no obvious desire to develop alternative facilities that did not appear on the long list.
- 2.5.8 The findings from the wider stakeholder engagement, including the results of the online questionnaire were used to inform the assessment and evaluation of the facility development options.

2.6 Options Evaluation

- 2.6.1 An evaluation of the long-list of potential development options was undertaken, following the initial stakeholder engagement, supply and demand analysis and the wider stakeholder engagement. The purpose of the evaluation was to identify which of the development options are most worthy of further design development, costing and business planning as part of Phase 2: Masterplanning.

2.6.2 In partnership with the Council, the following criteria was identified against which each longlist option was assessed:

- Contribution to Barnet Council’s strategic objectives
- Meeting identified need (supply and demand analysis and feedback from stakeholder engagement)
- Revenue implications
- Capital cost and funding considerations
- Planning considerations
- Deliverability (practical considerations e.g. footprint, key dependencies, phasing requirements etc.).

2.6.3 The evaluation of facility development options described in this section is summarised in Table 4. This includes a priority rating (High, Medium, Low) agreed with the Council for each option together with a brief summary of the rationale for this rating.

Table 4: Summary Evaluation of Facility Development Options

Facility Development Option	Priority Rating	Summary rationale
Outdoor Facilities		
New, improved and reconfigured football pitches	High	Core provision for the new sports hub. Pitches to be configured as per PPS.
New 3G Artificial Turf Pitches	High	Core provision for the new sports hub and strong income generator. 2 x floodlit 3G ATPs.
Multi-Use Games Area (MUGA)	High	Replaces ball court lost from West Hendon estate and provides year-round hard court for free access recreational activity. Planning condition.
Refurbished Tennis Courts	High	Improves existing provision and diversifies sporting offer on site
Wheeled Sports Facility – Skatepark, BMX	Medium to High	Evidence of demand for facilities for local young people but needs to be considered strategically linked to other schemes e.g. Montrose, Copthall.
Bowling Green	High	Desire to retain bowls provision if feasible.
New Play Areas	High	Core provision. Replaces existing and provides essential free access play opportunities. Design should explore more adventurous play for older children.
New outdoor gym and Trim Trail	High	Provides opportunities for informal, free access to fitness facilities at relatively low capital cost.
Improved pedestrian and cycle routes	High	Critical to success of overall scheme. Strong requirement to provide pedestrian and cycle route loop to connect WHPF with West Hendon estate.
Adventure Golf	High	Contributes to a 'destination' type offer and good revenue generator.
High Ropes	High	Contributes to a 'destination' type offer and good revenue generator.
Woodland Nature Trails	High	Capitalises upon ecological interest of SSSI and very popular choice through public engagement questionnaire.
Community Garden (Green Gym)	High	Low cost development with high social and community benefit. Provides alternative physical activity and helps mental wellbeing.
Sensory Garden	Medium	Creation of a designated sensory garden considered a lesser priority, but elements of sensory design should form part of overall site masterplan e.g. play areas, community garden, woodland nature trails etc.
Picnic Areas	Medium to High	Low cost option that will encourage longer dwell time and capitalise upon ecological interest and waterside location.

Facility Development Option	Priority Rating	Summary rationale
Indoor Facilities		
Café	High	Core provision for the site. Provides a central focal point and supports the proposed facilities and activities on site. Identified as the most popular option through the public engagement and one which will strengthen the overall revenue position.
Facilities for Hendon Bowling Club	High	Desire to retain bowls provision if feasible. Indoor ancillary facilities essential to support club operation.
Multi-use activity space (exercise classes, martial arts, boxing, gymnastics etc.)	High	Core provision for new sports hub. Established existing use (martial arts) and high demand for flexible indoor activity space. Would help strengthen overall revenue position.
Softplay	Medium	Provides additional income stream and supports the café but local competition may limit its appeal.
Clip and Climb (indoor climbing)	Medium	Contributes to more of a 'destination' offer and a good income generator but may conflict with alternative planned provision.
Community rooms / educational space	High	Would complement remaining but potentially reduced community space on WH estate and provide space for voluntary sector groups and schools, possibly linked to ecological interest of SSSI.
Nursery	High	Strong demand for nursery provision demonstrated by existing facility. Would provide a sustainable income stream to aid overall financial sustainability of site.
Changing accommodation	High	Core provision for the new sports hub - supports outdoor pitches.

2.7 Conclusions and Recommendations

- 2.7.1 During Phase 1: Options Appraisal, the first phase of the masterplanning project, SLC identified a long list of potential facility developments consistent with the Council's brief of establishing WHPF as a strategic sports hub with a wider leisure and community offer.
- 2.7.2 A summary of the key conclusions arising from the Options Appraisal is provided below.
- a. SLC's review of the Council's key strategic documentation together with the assessment of the current condition of facilities and operation of WHPF helped to identify clear requirements for improved sports, leisure and community facilities.
 - b. SLC's widespread engagement with key stakeholders including Council officers, National Governing Bodies of sport, key users/occupiers, local stakeholders and the wider general public further informed the preferred facility development options.
 - c. A supply and demand analysis supplemented the strategic review and stakeholder engagement and identified market potential for additional complementary facilities to help diversify the offer and support the overall financial sustainability of the site.
 - d. A long list of potential facility development options has been identified through the strategic review, stakeholder engagement and supply and demand analysis. This longlist has then been prioritised in consultation with the Council.
 - e. The prioritised long list of options shown in Table 3 will be used as the basis of the facility mix to take forward to Phase 2: Masterplanning.
 - f. The development of Phase 2: Masterplanning will need to carefully consider and mitigate the planning constraints linked to the site's designation as Metropolitan Open Land and the SSSI status of the wider site.
 - g. Due to the spatial requirements and planning constraints for developments which are to be explored through Phase 2, those options which are considered to be a lesser priority may need to be excluded from the final facility mix.
- 2.7.3 The recommendations arising from Phase 1: Options Appraisal are as follows:
- a. That the assessment of the long list of facility development options forms the basis of the facility mix for West Hendon Playing Fields to be developed through Phase 2: Masterplanning.
 - b. That the priority ratings for each facility development option are taken into account through the development of the masterplan.

3 DESIGN DEVELOPMENT

3.1 Introduction

3.1.1 Having established a recommended facility mix through Phase 1: Options Appraisal, SLC and its associate architect and landscape architects have developed a brief for the site which includes the Community Sports Hub, ancillary and outdoor facilities.

3.1.2 This section explains how each of the designs for the proposed new facilities have been developed to meet their required brief. Extracts from the draft masterplan to illustrate the outline design proposal are included in this section of the report with full copies of all drawings provided in Appendix 2: Masterplan Drawings.

3.2 Community Sports Hub Brief

3.2.1 The following brief has been developed for the Community Sports Hub. The approximate total gross internal floor area of the building, including upper level plant areas, is 1975 square metres (sqm) and the proposed accommodation is as follows:

- A café providing covers for 50-60 persons seated internally and with an external terrace providing an additional 20-30 covers. The café servery is proposed to act as a central reception and control point for the Community Sports Hub to maximise staffing efficiency.
- A kitchen and food storage area suitable for preparing hot and cold snacks.
- 2 no. unisex public toilets designed for those with disabilities and with baby changing facilities. Control and maintenance to be managed by the café operator. Access to the public toilets will not involve entry to the heart of the building.
- A clip and climb (indoor climbing) area of approximately 75 square metres suitable for 10-12 challenges suitable for children and adults. The height of the space is proposed to be in the order of 9 metres and consist of a variety of colourfully designed individual climbing challenges with traversing and drop slides. The activity would be visible from the café and managed from central reception with a separate equipment storage area.
- An indoor adventure soft play area of approximately 60 square metres and double storey height managed from the central area and visible from the café.
- Subject to detailed discussions with the current nursery provider, SLC has included in the brief a new nursery area suitable for 50 children with associated small office, kitchenette, toilets and storage. The area would be sub-divided into different zones with controlled access to a secure external play area. The entrance to the nursery is to be secure and managed from reception.
- An open plan office area for the Community Sports Hub suitable for 5 persons.
- 2 no. multi-use community rooms each suitable for 20 persons. Adjacent storage to be provided.
- Subject to detailed discussions with Hendon Bowls Club, SLC has included in the brief new facilities for the club including: separate entrance and lobby with controlled access, a 100 sqm function room/lounge directly overlooking the bowls green, kitchen and store with servery for hot and cold snacks, bar and store with servery, male and female changing accommodation with showers and lockers, assisted changing room and disabled toilet, male and female toilets.
- 2 no. multi-use activity studios (180 sqm each) for c. 25 persons and suitable for exercise classes, martial arts, boxing, gymnastics etc. Storage areas adjacent to each studio. The

studios can be combined into a larger space (360 sqm) by sliding back acoustic partitions.

- Male, female and disabled toilets in a central area to meet the programme needs of the hub building.
- 8 no. team changing rooms to Sport England standards to support the sports facilities on site. Each externally accessed changing room will contain its own toilet and showers and be suitable for both male and female team use.
- A referee changing room, accessed externally.
- An assistant referee changing room, accessed externally which can also provide assisted changing accommodation for those with disabilities.
- Ground and roof level plant rooms for mechanical and electrical services. No plant will be open at roof level which otherwise would be susceptible to vandalism.
- An external lockable storage area for goals, nets, flags etc.
- An external lockable storage area for approximately 20 cycles which can also be used as a hire point.

3.2.2 A breakdown of specific floor areas for the facilities listed above is summarised in an accommodation schedule contained in Appendix 3: Accommodation Schedule.

3.3 Outdoor Facilities Brief

Improved and reconfigured football pitches

3.3.1 The grass football pitches are to be reconfigured in accordance with the Council's Playing Pitch Strategy to create the following. Surfaces, levels and drainage are to be improved throughout to FA standards:

- 2 full size adult pitches 100 x 64 metres plus 6 metres run off.
- 4 junior (U13/14) 11 v 11 pitches 82 x 50 metres plus 6 metres run off.
- 1 junior 9 v 9 pitch 73 x 46 metres plus 6 metres run off.
- 1 junior 7 v 7 pitch 55 x 37 metres plus 6 metres run off.
- 1 junior 5 v 5 pitch 37 x 27 metres plus 6 metres run off.

3G Artificial Turf Pitches (ATPs)

3.3.2 2 no. full size 3G surface ATPs are to be provided 100 x 64 metres with 6 metres run off. Each ATP is to be screened with robust fencing approximately 2 metres high with lockable gates, rebound boards and floodlighting subject to planning considerations. Pitch markings to include for small-sided and junior football.

Multi Use Games Area (MUGA)

3.3.3 A 36.6 x 21.35 metres multi-use games area is proposed for year-round use with a porous macadam surface suitable for a range of sporting activities including netball, basketball and five-a-side football. The area will be enclosed by fencing 2 metres high and with rebound boards and floodlit, subject to planning considerations.

Tennis Courts

3.3.4 The existing two tennis courts are, as a minimum, to be resurfaced for general games use and fencing replaced. It is not proposed that floodlighting is installed. The courts are currently free

to use. The Council is reviewing a tennis charging scheme for all of its tennis courts and any change in the current policy would apply to all of its tennis courts.

Wheeled Sports Facility

- 3.3.5 A wheeled sports facility will be designed and constructed by a specialist operator for skateboarding, scootering and BMX.

Bowling Green

- 3.3.6 The existing six rink bowls green for Hendon Bowls Club is of a good standard and the club has a good standing in its sport. It is proposed to be retained including its surrounding fencing and screening. The phasing of the masterplan should allow play to be continued throughout the construction period.

Adventurous Play and Toddler Play

- 3.3.7 The current play area and equipment are of poor quality and are to be replaced. It is proposed that there will be a new play area for younger children and more adventurous play facilities and equipment designed to appeal to older children.

Outdoor Gym and Trim Trail

- 3.3.8 There will be freely available purpose design outdoor exercise equipment suitable for all ages with simple instructions and signage. The outdoor gym will be in an area overlooked by footpath and cycle routes to provide visual interest. This will then lead to a trail of fixed equipment sited on pedestrian and cycle routes which will provide a planned training path.

Adventure Golf

- 3.3.9 Subject to specialist design the adventure golf course is a year-round activity similar to mini golf with fun design features and obstacles and suitable for all ages and particularly family use. There will be low level lighting for evening activity. Entry and priced admission will be controlled at a separate kiosk.

High Ropes

- 3.3.10 The layout and design of the high ropes course will require design input from a specialist operator with different sections suitable for all ages. The course is to be integrated to make use of the existing site contours and trees. It will feature a course of high-level platforms, some supported from trees or frames, linked by different types of rope access routes. There will also be zip wire routes for older children and adults.

Woodland Nature Trail

- 3.3.11 The woodland nature trail will be integrated with the pedestrian and cycle trails and designed to stimulate and inform children and adults of the existing natural environment. There will be interpretive signage linked to images and educational content within the Community Sports Hub.

Sensory Garden and Community Garden

- 3.3.12 Two garden areas are proposed which may be adjacent. The sensory garden will be designed to stimulate different senses through the use of colour, sound and smell which can be particularly beneficial for those with a range of disabilities. The community garden is designed to be cultivated by members of the community who will take ownership of the area. It will provide an opportunity to be physically active, encourage community interaction and cohesion and can help tackle mental health issues linked to social isolation.

Pedestrian and Cycle Routes

- 3.3.13 New combined pedestrian and cycle routes are proposed to provide access routes in, around and across the site.

3.4 Design Development of Community Sports Hub

Design Principles

- 3.4.1 The design development of the Community Sports Hub has been influenced by the following factors:

- The entrance to the facility should face the access from Goldsmith Avenue and from the future Silk Stream bridge.
- The café and its external terrace should have good views of the external facilities. The external terrace should receive good sunlight levels.
- The nursery external play area should be protected and benefit from its natural surroundings.
- The building should enhance the adjoining SSSI.
- The bowls club facilities should overlook the existing bowls green and have its own entrance.
- The public toilets should be within the building and be controlled by the café operator.
- The layout should maximise use of staff and facilitate efficient management control.
- The bowls green should be retained and capable of use throughout the construction process.

Location

- 3.4.2 The proposed Community Sports Hub is c. 2000 sqm in area, approximately twice the size of the existing building and is proposed to be sited in broadly the same location as the existing building. This is considered to be the optimal location as it is close to existing parking provision and provides a sense of arrival from the only vehicular entrance on the site and from the new Silk Stream bridge linking the West Hendon estate. It also sits adjacent to the retained bowls green.
- 3.4.3 The Community Sports Hub is also proposed to be located close to many of the new activity areas including toddler and adventurous play areas, multi-use games area, adventure golf, outdoor gym and community garden.
- 3.4.4 SLC has examined options on how the existing building can be retained in operation whilst the new Community Sports Hub is constructed. However, this has not proved viable and therefore it will be necessary for the current nursery and martial arts tenants to be relocated for the duration of the construction period. The bowls green will remain in use throughout the construction period but alternative temporary changing facilities will need to be provided for the bowls club at a safe location on site until the new building is complete. As the bowls club will remain on site throughout the construction period, the alternative temporary facilities have been included in the budget cost estimate as a capital cost. However, the temporary relocation of the nursery and martial arts tenants has not been included in the budget cost estimate as this will be a revenue cost and will be subject to further investigation by the Council at a later stage and through consultation with these tenants.

Figure 1: Extract from Initial Draft Masterplan showing Community Sports Hub



Figure 2: Visual representation of entrance to Community Sports Hub (indicative only)



Layout

- 3.4.5 The current approved design of the Silk Stream bridge terminates in a long ramp down to meet disability requirements to existing car park level which is approximately 1.6 metres below ground floor level of the existing building. Although no topographic information is available for the existing building and its surroundings, it is extremely likely that the new building will have to be based at the existing, higher level to avoid flooding. In order to solve the access problem to the new Community Sports Hub and avoid space consuming ramps SLC therefore believe that an adaptation of the Silk Stream bridge will be required. An additional connection to the bridge is proposed to provide a level access to the main entrance and this has been included in the budget cost estimate for the project.
- 3.4.6 The reception point of the Community Sports Hub immediately faces the entrance with open views through the café to the clip and climb and soft play zones. This will encourage use of all facilities and help to manage all these areas from one central point. The central reception point also acts as a server for the café to aid efficient staffing and will control access to the remainder of the building. Public toilets are located adjacent to the entrance for ease of supervision.
- 3.4.7 The community rooms are located close to this point to help accommodate larger groups of people at peak times.
- 3.4.8 The design of the nursery is yet to be developed and will depend on a more detailed brief through discussion with the nursery operator. It is self-contained with its own toilets, kitchen and office. At this stage an open space has been shown but it is anticipated that it will be subdivided into different zones, each with natural light and views of the landscaped surroundings. An external play area wraps around the corner of the building to provide essential and attractive outdoor space with views across the woodland.
- 3.4.9 The staff offices, main toilets and small plant room are located centrally within the building. The main plant areas are located above the eight team changing rooms, each of which is accessed externally and has self-contained toilet and showers.
- 3.4.10 The remainder of the central building spine contains the two multi-use activity areas, each with their own storage. The areas can be interconnected by means of acoustic retractable partitions which can create a large space of approximately 360 sqm.
- 3.4.11 The main corridor then connects to the bowls club facilities. However, the primary entrance for the bowls club is separate from the west and connects to the proposed cycle and footpath network. The bowls club brief will need to be developed in detail through consultation with the club but the accommodation includes toilets, changing accommodation, storage and central lounge area served by a kitchen and bar with associated storage. The lounge area overlooks the bowls green to the south.
- 3.4.12 Additional associated accommodation accessed externally includes:
- A referees and assistant referees changing rooms (which also double up as an assisted changing area).
 - A cycle storage area which can also be used as a central hub for cycle hire on the site.
 - A store for goals, nets and corner flags.
- 3.4.13 A plan of the proposed layout of the Community Sports Hub is shown in Figure 3.

Figure 3: Community Sports Hub Plan



3.5 Design Development of Outdoor Facilities

3.5.1 The adventurous play area is located close to the café and café terrace. It is also visible from the entrance to the site to be an immediate attraction but shielded from the adjoining residential properties by a landscape buffer.

3.5.2 The toddler play area is sited immediately adjacent to the café terrace for ease of supervision by parents and also to maximise benefits of the café. It is separated from the adventurous play area by footpaths and landscaping.

Figure 4: Extract from Initial Draft Masterplan showing Adventurous Play area

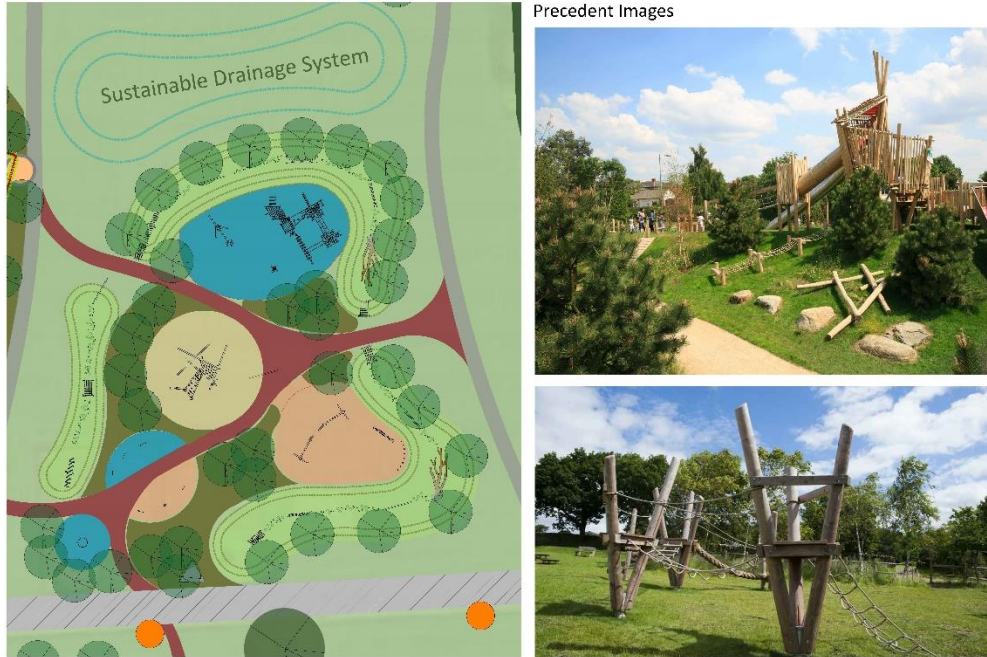


Figure 5: Extract from Initial Draft Masterplan showing Toddler Play area



Sensory Garden & Community Garden

- 3.5.3 A sensory and community garden is located on the west side of the bowls green in close proximity to the Community Sports Hub. It will consist of hard and soft landscaped areas with planting beds at different levels to suit different ages and abilities and its location will help to provide a unique focal point on the site.

Figure 6: Extract from Initial Draft Masterplan showing Sensory/Community Garden



Woodland Nature Trail

- 3.5.4 It is envisaged that a woodland nature trail would be integrated into the footpath and cycle network with appropriate interpretation and signage to tell a story which educates visitors on the ecological interest of the site. This could be linked to further displays within the Community Sports Hub and the community rooms could be used to host school visits.

Adventure Golf

- 3.5.5 The 18-hole adventure golf course takes advantage of the site topography alongside the north-west boundary and screened from residents by a landscape buffer. It is visible from the café in the Community Sports Hub. Access to the adventure golf is via a footbridge over water features which would be an integral part of a sustainable drainage system for the site. Entry would be via a small kiosk from where management supervision would be administered.
- 3.5.6 A new orchard is proposed to provide a foil south west of the adventure golf and which would provide visual interest along the footpath and cycle routes.

Figure 7: Extract from Initial Draft Masterplan showing Adventure Golf



High Ropes

3.5.7 The proposed high ropes course is integrated with the mature woodland and varying topography in the south of the site. Admission would be controlled from a kiosk which would provide entry, snacks, toilet facilities as well as equipment and suitable storage. Detailed design of the course would be provided by a specialist operator. The kiosk would be located adjacent to the new 99 space car park accessed from Cool Oak Lane.

Figure 8: Extract from Initial Draft Masterplan showing High Ropes course



3G Artificial Turf Pitches and improved grass football pitches

3.5.8 The two full size 100m x 64m 3G artificial turf pitches would be fenced and floodlit. They are to be located immediately adjacent to Hendon Football Club / Silver Jubilee Park on the

western boundary of the site. This locates the floodlights and potential noise disturbance in an area which mitigates planning risk associated with the SSSI. The proximity to Hendon Football Club also ensures that the 3G pitch provision is concentrated in one area of the site.

- 3.5.9 Adjacent pedestrian access to the 3G pitches is via a pedestrian gate on the western boundary. This then connects to the pedestrian and cycle network within the site and to the new car parking off Cool Oak Lane.
- 3.5.10 The grass pitch numbers and specification are in accordance with the brief described in 3.3.1. Three of the additional junior football pitches are proposed to be located in the area enclosed by trees at the north west corner of the site and will require further topographical surveys to ensure compliant gradients.

Outdoor Gym & Trim Trail

- 3.5.11 The outdoor gym is located immediately adjacent to the café terrace and adventurous play. This location is designed to be an immediate attraction and visible from the footpath and cycle network. The trim trail would spring from the outdoor gym and be integrated with the footpath and cycle routes.

Figure 9: Extract from Initial Draft Masterplan showing Outdoor Gym



Figure 10: Extract from Initial Draft Masterplan showing Trim Trail



Bowling Green

- 3.5.12 The existing six rink Hendon Bowls Club green is well established, in good condition and integral to the club's operation. It is proposed to remain in its existing location, adjacent to the club's indoor facilities in the new Community Sports Hub. The building will occupy the green space currently between the bowls green and existing pavilion so the indoor facilities will be much closer to the bowls green.

Tennis Courts

- 3.5.13 The two existing fenced tennis courts are in very poor condition and rarely used. In order to improve the car parking provision at the north of the site it is proposed that the tennis courts are removed and replaced by a 62 space car park accessed from Goldsmith Avenue and screened from residents.
- 3.5.14 Two new replacement fenced tennis courts will be located immediately south of the bowls green.

Multi-Use Games Area (MUGA)

- 3.5.15 It is proposed that the MUGA is sited adjacent to the northern car park and at the intersection of the primary access routes from north and east. The MUGA would be fenced and floodlit (subject to planning consent) and screened by soft landscape from adjoining residential properties. It is located close to the Community Sports Hub to allow for close supervision and easy access to changing and toilet facilities.

Wheeled Sports Facility

- 3.5.16 The proposed wheeled sports facility for BMX, skateboarding and scootering is sited adjacent to the new car park off Cool Oak Lane and linked also to the site's cycle and footpath network. This siting is in an area of low risk to disturbance to residential properties but also visible from the road.

3.6 Summary

- 3.6.1 SLC and its associate team of architects and landscape architects has developed a clear brief for the site based upon the facility mix identified through Phase 1: Options Appraisal. This brief has been met through the development of RIBA Stage 2 designs for each of the proposed facilities which deliver on the Council's aspiration to create a new sports hub with associated community facilities.

4 INITIAL DRAFT MASTERPLAN

4.1 Introduction

- 4.1.1 The facilities described and developed through Sections 2 and 3 above have been drawn together to form an initial whole-site draft masterplan.
- 4.1.2 The initial draft masterplan shows the location of all the proposed indoor and outdoor facility developments and the additional infrastructure required to support these including additional car parking, access improvements, pedestrian and cycle routes and landscaping improvements. Supporting text is also provided in this section to describe how the site's identity will be improved and how the overall masterplan responds to the ecological constraints.
- 4.1.3 The draft masterplan develops first from an understanding of its context and the Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis undertaken by SLC and presented within the Options Appraisal report.
- 4.1.4 The opportunities of the site have been identified and developed further through the briefs for the Community Sports Hub and outdoor facilities and development of the wider draft masterplan. The process has also sought to address the weaknesses identified in the site analysis.
- 4.1.5 The site masterplan has been developed by SLC through consultation with the Council's project team and has been guided throughout by the following design principles.

4.2 Site Identity

- 4.2.1 The existing site is an important and well used sporting, recreation and community resource with strong links to adjacent areas of significant ecological interest. However, the site is unwelcoming, appears unloved and is characterised by rundown built infrastructure, poor quality outdoor facilities, poor access and circulation routes and an overarching lack of identity. It is made up of a series of unconnected functions operating in isolation and with an apparent lack of overall site management. This has resulted in a disparate, disjointed and incoherent offer.
- 4.2.2 The draft Masterplan developed by SLC divides the site naturally into the following four distinct sections, each of which has unique characteristics and will contribute to a much stronger overall identity for the site:
- The northern section contains the Community Sports Hub and linked ancillary facilities grouped around the new building with entrance access from the north and the future proposed Silk Stream bridge from the new residential development to the east. There would be immediate visual interest and activity generated by the Community Sports Hub, adventurous play and toddler play areas, outdoor gym, MUGA, adventure golf, bowls and tennis courts.
 - The central area of the site is characterised by natural grass and artificial turf pitches to meet the requirements of the Council's Playing Pitch Strategy and located to suit the site topography and orientation. The two floodlit 3G ATPs are located in this zone but adjacent to the Hendon Football Club (which is floodlit) to mitigate light and noise disturbance to both residents and wildlife in the Local Nature Reserve and SSSI.
 - The eastern section of the site is primarily a natural area protected by SSSI designation. This area of the site is enhanced by improved pedestrian and cycle routes through the site, educational nature trails, and bird hides overlooking the Welsh Harp reservoir.

- The southern part of the site, proposed to be accessed from Cool Oak Lane, currently appears divorced from the main site and the land use is not maximised. However, through the introduction of new facilities (high ropes course and wheeled sports facility) suited to the topography, this area of the site will take on a new character.

4.3 Access and Car Parking

- 4.3.1 The site can only be currently accessed by vehicles from the north from Goldsmith Avenue via the A5. The site access is directly off a bend which is frequently bordered by parked cars. It is a congested approach and not compatible with such an important site. Signage is minimal, first impressions are very poor and the existing site access is a limiting factor on the increase in facilities and anticipated intensification of use, particularly in the northern section of the site. Coach access would be very difficult.
- 4.3.2 Car parking on site is currently contained in two areas at the northern entrance containing a total of 45 spaces, part of which is controlled by barrier. This serves the nursery, bowls club and martial arts facilities within the existing building and external pitches. SLC understands it is also used as an overspill car parking area for supporters of Hendon Football Club which then traverse the site to the west on match days.
- 4.3.3 As part of this study, consideration has been given to the likely patterns of use of facilities included on the site and potential future parking demand associated with the different development options.
- 4.3.4 An indicative programme of use has been developed by SLC to inform the parking requirements for the current and proposed additional facilities. The programme of use can be found in Appendix 4: Programme of Use. This provides an indication of the likely usage of the site in terms of the number of visitors that would be on site at different times of day and during different seasons.
- 4.3.5 For each facility, likely patterns of use in terms of the number of users expected to be accessing the facility at any given time were estimated based on current usage (e.g. football pitch bookings etc.) and / or SLC industry knowledge and experience of similar facilities. Where facilities are accessed on a more formal basis, i.e. through booked sessions or classes, the overlap of users arriving in advance of their booked session and departing from the preceding session was also considered.
- 4.3.6 The programme of use provides an indication of the maximum likely levels of use at the site across all facilities. This indication of the likely level of peak usage was subsequently used to inform car parking requirements at the site.
- 4.3.7 Car parking requirements were calculated from the total number of users estimated to be on the site by the programme of use and an assumption that 44% of total users travel to the site by car. This assumption was based on the current travel habits of visitors as reported through the online survey undertaken through Phase 1: Options Appraisal.
- 4.3.8 The maximum number of users and car parking requirements as calculated by the programme of use for each season is shown in Table 5. The winter peak is reached on Sunday mornings when all of the football facilities are in use and there is some crossover of users between match sessions. The summer peak is reached at late afternoon (5pm) on weekdays when a number of facilities have booked sessions with some crossover of users and many of the facilities have relatively high levels of casual use.

Table 5: Projected WHPF Usage and Parking Requirements

Projected WHPF Usage	Winter	Summer
Maximum number of users	623	353
Maximum number of cars	274	155

- 4.3.9 The Masterplan provides a total of 236 car parking spaces. 137 spaces are located off Goldsmith Avenue and adjacent to the community sports hub in a newly designed area designed to separate pedestrians and vehicle movement. 99 spaces are located in a new area proposed to be accessed from Cool Oak Lane to the south. A coach drop off and lay-by is located off Cool Oak Lane. This new car parking area serves the new high ropes course, wheeled sports facility and also provides more immediate car parking for the two new 3G ATPs and grass pitches. This additional car parking will take some of the pressure from the access to the north.
- 4.3.10 The 236 spaces are not sufficient to meet the maximum number of cars projected through the programme of use (274 in winter months). It will therefore be essential that the Council explores opportunities for a network of more sustainable transport routes to the site through improved cycle and pedestrian routes and connections from the surrounding areas and through improved public transport links.
- 4.3.11 A detailed travel, parking and access study will be required to explore this further as part of any future planning application.

4.4 Connections and Routes

- 4.4.1 Two footbridges at Silk Stream (north) and Cool Oak Lane (south) are planned to be completed in 2023 and 2020 respectively, as part of the Barratt West Hendon development. Although not designed for cycle traffic, the bridges will be vital components in forming a continuous pedestrian route from the West Hendon residential development to the playing fields site. The timing of the completion of these footbridges will be critical to the success of the redevelopment of the playing fields site. As noted above, it is vital also that future plans to improve the cycle network beyond the site boundaries are taken forward to maximise the benefit.
- 4.4.2 The footpath network within the site is currently incomplete and of very poor quality, unsuitable for pushchairs, wheelchairs, cycles and often unusable in wet weather.
- 4.4.3 SLC's proposed Masterplan will link to the new bridges at Cool Oak Lane and Silk Stream to provide good quality footpaths and a cycleway network within the site connecting all parts of the site and its facilities. These routes will also have measured circuits for informal fitness training and be overseen by CCTV.

4.5 Ecological Interest

- 4.5.1 The site has strong ecological interest and outside the playing fields zone, the site is covered by the Brent Reservoir designated Local Nature Reserve and Site of Importance for Nature Conservation. The site also forms a buffer zone to the Brent Reservoir which is a designated Site of Special Scientific Interest (SSSI), providing a vital habitat for wildlife.

4.5.2 SLC commissioned MKA Ecology to undertake a Preliminary Ecological Appraisal (PEA) to include a Phase 1 Habitat Survey and protected species scoping survey supported by desktop analysis. A copy of the full PEA is provided in Appendix 7 and the recommendations are set out below.

- Undertake a consultation with Natural England and the Local Authority regarding Brent Reservoir (Welsh Harp) SSSI, LNR and Site of Metropolitan Importance to agree key issues and baseline requirements for further survey. If necessary, this may require consultation through the Natural England Discretionary Advice Service.
- Protect and retain the woodland, hedgerows and ponds on site.
- Consult an invasive species specialist to control the giant hogweed on-site. The cherry laurel and rhododendron should also be removed.
- Undertake a Himalayan balsam survey to confirm its presence or absence.
- Undertake eDNA surveys of the ponds on site to determine the presence or absence of great crested newt. If Presence is confirmed further surveys will be required, though presence is considered a less likely scenario.
- Undertake a presence or absence survey for reptiles at West Hendon Playing Fields unless it can be established that the areas of semi-improved grassland and woodland edge will not be disturbed during construction or development works.
- Breeding bird and wintering bird surveys should be undertaken at West Hendon Playing Fields. The Common Bird Census methodology should be employed to identify the species assemblage that is present at the site as well as providing data on the number of territories for each species during breeding season. The review needs to consider the relationship between the masterplan development footprint and the SSSI.
- If any habitat suitable for breeding birds is to be removed this should be completed outside the breeding bird season which runs from March to August inclusive. Any clearance of breeding bird habitat between March and August should be preceded by a nesting bird check.
- A bat inspection of buildings and trees at the Site should be completed to establish potential presence of bat roosts. This should be undertaken in accordance with the Bat Conservation Trust's Good Practice Guidelines (Collins, 2016).
- Bat activity transect surveys should be completed at the Site to identify species present, key foraging areas and commuting routes. These surveys should be completed in accordance to the methodology set out within the Bat Conservation Trust's Good Practice Guidelines (Collins, 2016).
- Light pollution from any lighting should be minimised both during construction and post-development. A sensitive lighting scheme should be developed to allow for suitable roosting and foraging areas for bats within the site with maximum use of down lighting and hoods where necessary.
- Ongoing monitoring of the disused sett during breeding and wintering bird surveys to inform of any changes in occupation of this species. This could lead to a full badger survey if activity is recorded.
- It is recommended that native British species are incorporated within the planting scheme for the final landscaping design in order to enhance the overall value of the site for biodiversity, in line with the requirements of the National Planning Policy Framework (NPPF). The planting scheme needs to ensure the creation of green corridors across the site post-development.

- It is recommended the proposed orchard is non-intensively managed and connected with the wider landscape to improve biodiversity and form part of a network of ecologically rich habitats across the Site.
- It is recommended that the Water Sensitive Urban Design feature is designed to enhance biodiversity. Depending upon the characteristics of the pond, enhancements to be considered include irregular margins and islands and ecological support should be sought in finalising the design and during construction to maximise its biodiversity potential.

4.5.3 The recommendations arising from the PEA include requirements for a number of additional ecological surveys which are likely to be required to support any subsequent planning application. Critically, there will also need to be consultation with Natural England during the pre-application stage.

4.5.4 One of the key design principles guiding SLC's development of the site Masterplan has been to enhance the existing ecological features of the SSSI through improved access and interpretation and to ensure that the increased activities and facilities will not adversely impact upon these features.

4.5.5 As a result, the Community Sports Hub has been located in a similar position to the existing building to mitigate any adverse effect on the SSSI. The floodlighting of the 3G pitches has been located as far west as possible from the SSSI to mitigate the effect of light pollution on bats and birds and many of the other additional facilities and activities have been located to the north and west of the Community Sports Hub, again to minimise the impact on the SSSI.

4.6 Landscaping and Drainage

4.6.1 Proposed soft landscaping elements will include a wide range of planting types, creating a rich landscape setting to the playing fields site. This includes extensive shelter belt tree planting, tree lined avenues, specimen parkland trees, a new orchard, a sensory /community garden, hedgerow planting, wildflower and bulb planting, as well as enhance and extend the site's woodland and scrub areas, all combining to greatly improve the site's biodiversity. Landscaping and Water Sensitive Urban Design (WSUDS) will be integrated to provide an attractive setting which positively contributes to the site's character.

4.6.2 Whilst the masterplan exploits the site's designated ecological significance through interpretation, signage, activities and education, measures will be taken to ensure that sensitive ecological areas will be protected and further consultation will be required with stakeholders and Natural England to ensure that concerns are taken on board.

4.6.3 As the site is within the Environment Agency's flood risk zone 2 and 3, specialist hydrologists, Hydrologic were commissioned to prepare a Flood Risk Assessment (FRA) and Surface Water Management Plan (SWMP) and to prepare a model to determine that the masterplan and drainage proposals are broadly viable, subject to further development based on topographical surveys. Consideration has been given to the ongoing flooding issues and the ecological sensitivities of developing the site adjacent to the Brent Reservoir.

4.6.4 Surface water runoff is largely mitigated through the creation of Water Sensitive Urban Design / attenuation basins, permeable surfacing and rain water gardens. A large attenuation basin with permanent water is proposed to the west of the proposed Community Sports Hub.

4.6.5 The landscaped area will provide a new character type to the park and enhance the setting of the proposed Adventure Golf Area, Adventurous Play Area and adjacent pedestrian routes.

4.6.6 To achieve playing fields that comply with Sport England guidance, significant earthworks have been proposed which would accentuate the existing terracing across the site and extensive drainage is proposed, in many cases to alleviate existing waterlogging conditions.

4.7 Planning and Highways Feedback

4.7.1 Preliminary feedback on the proposed site masterplan has been provided from the Council's Strategic Planning and Highways Officers as follows:

- The location and rationale behind the siting of all the proposed facilities on the masterplan was understood and noted.
- A robust case would need to be made at the time of a future planning application to support the proposal to justify development on Metropolitan Open Land. This would include the community and commercial need for the facilities, proposed programme of use, intensification of the site, highways/parking and sustainable transport strategy.
- The footprint of the existing building is approximately 50% of the floor area of the new Community Sports Hub. Although this was an increase this would help to justify some further built form on Metropolitan Open Land.
- The developing masterplan would help to support the strategy for improved cycle connections outside the site boundaries.
- There were no proposals yet emerging from the TfL report on the A5 corridor which will affect access to the site.
- It was recognised that the proposed car parking on Cool Oak Lane would support activities in the south of the site and take some pressure off parking need at the north of the site. Control of the car parking area would be important.

4.8 Initial Draft Masterplan

4.8.1 Taking account of the design principles described above and requirements of the brief identified through Phase 1: Options Appraisal, SLC has developed an initial draft Masterplan which is shown in Figure 11 below and provided in Appendix 2: Masterplan Drawings.

Figure 11: Initial Draft Masterplan



5 STAKEHOLDER AND PUBLIC ENGAGEMENT

5.1 Introduction

- 5.1.1 Engagement was undertaken with current users and occupiers, wider stakeholders and the general public to seek feedback on the initial draft masterplan.
- 5.1.2 The stakeholder engagement consisted of telephone calls and meetings with key stakeholders, including attending the West Hendon Regeneration Partnership Board and telephone consultation with current users / occupiers such as Hendon Bowls Club and the Nursery.
- 5.1.3 The wider public engagement consisted of an online questionnaire which was publicised on the Council's consultation platform, Engage Barnet and advertised through its social media channels and on posters in the park. The questionnaire was also sent out to previous consultees, current users, local sports clubs and identified organisations who may have an interest in the future development of WHPF.
- 5.1.4 A drop-in session was also held on 13 November 2018 at West Hendon Community Hub to provide an opportunity for the public to view the masterplan up close, provide feedback and ask questions of the SLC team.
- 5.1.5 This section reports on the key findings from this stakeholder and wider public engagement.

5.2 Stakeholder Engagement Feedback

- 5.2.1 A summary of the key findings from the stakeholder engagement is provided below.

National Governing Bodies (NGBs)

- 5.2.2 Middlesex FA confirmed their support for 2 x 3G Artificial Turf Pitches at WHPF, rather than any other location, or splitting the two pitches over different sites.
- 5.2.3 Sport England were positive about the creation of sport hub sites which aligns with recommendations of the PPS and would create a destination for a mix of formal and informal sport.
- 5.2.4 However, they were concerned over indicative layouts of some facilities (the orchard and skate/BMX park) and reduction in playing fields land. Sport England would remain in dialogue with Barnet Council as the project progresses.
- 5.2.5 London Sport commented that the draft masterplan felt robust in terms of aligning to the Council's strategic priorities and in terms of the stakeholder engagement.

Current Occupiers

- 5.2.6 Overall, the current occupiers of the site were supportive of the overarching principle to develop the site and provide new and additional facilities that would increase engagement from the local community. They were generally positive about the mix of facilities and proposed location and could see how such developments could positively impact upon their own clubs/services.
- 5.2.7 However, they also stressed that the ongoing maintenance and wider management of the whole site required careful thought to avoid some of the existing problems experienced by users. A clear and properly resourced management plan would be required in order for the investment to be protected and to ensure these facilities were successful and sustainable.

- 5.2.8 Hendon Bowling Club felt the proposed new provision was positive and the club were satisfied with their autonomous space within the Community Sports Hub.
- 5.2.9 Whilst Parkside View Nursery were positive about the wider draft Masterplan and regeneration of the site, they were concerned about the space allocated for the Nursery and felt it should be bigger. SLC has subsequently revisited the plan for the Community Sports Hub and allocated space broadly in accordance with the existing provision.
- 5.2.10 The bowling club and nursery were keen to understand more about transitional arrangements and continuity of service during construction. This would need to be carefully considered by the Council through any subsequent phases of the project.
- 5.2.11 It should be noted that SLC has made numerous attempts to engage Chin Woo Martial Arts club who also occupy part of the existing pavilion but to date have received no response. It is understood that the club has invested significantly into reconfiguring their space within the building and the Council may therefore need to engage with the club as part of any subsequent design stage of the project.

Key Stakeholders

- 5.2.12 The feedback from key stakeholders on the draft Masterplan was mixed. Again, there was broad support for the principle of the proposed developments and the Council's aspirations for promoting healthy lifestyles for the local community through improved opportunities to be physically active. However, there were also a number of concerns raised by ecological stakeholders relating to the impact upon the SSSI and Local Nature Reserve.
- 5.2.13 The West Hendon Regeneration Partnership Board were positive about the proposed developments, remarking that the draft Masterplan included exciting facilities and activities that would appeal strongly to the local community and would give the site a proper identity. The Board were also happy to see that there was a good balance between free to access activities and more commercially based opportunities to provide income to make the site financially sustainable.
- 5.2.14 Hendon FC, based in Silver Jubilee Park, were very positive about the draft Masterplan and said that the much-needed improvements reflected the wider regeneration of the area. They stressed that the provision for football pitches is much-needed and felt that the Artificial Turf Pitches would be in high demand and excellent for the local community. They also noted that the improved pedestrian / cycle routes would make a significant difference to the site.
- 5.2.15 GLL, Barnet Council's leisure management partner and a specialist leisure operator working across the UK, agreed that the proposed draft masterplan was a very positive opportunity to provide community programmes and increase participation in sport and physical activity beyond a traditional leisure centre setting.
- 5.2.16 GLL noted that recent investment in a new climbing facility at Hendon Leisure Centre (HLC) was likely to pick up some of the identified unmet demand for this type of activity and that the performance of this new facility at HLC would need to be assessed over the next couple of years to better understand the market potential for further provision. They also noted that the proposed location of the high ropes course may be challenging from a supervisory perspective but recognised that this may be managed by a separate specialist operator.
- 5.2.17 London Wildlife Trust (LWT) noted that they were 'not unsympathetic' to a general desire from the Council to improve WHPF and the need for investment linked to the wider regeneration of the area. They recognise that the wider area is undergoing significant change but any development needs to protect existing ecological interest. LWT feel that the proposed developments heavily intensify the site, particularly to the north and there are a number of

issues linked to the Local Nature Reserve designation which would need to be worked through e.g. impact of proposed high ropes course, lighting to pedestrian routes and floodlighting of ATPs, expected levels of usage and night time activity, all of which had potential to impact negatively upon local wildlife.

- 5.2.18 LWT noted that the current management of the SSSI is ad hoc, inconsistent and appears to have been a victim of austerity. There would be merit in bringing all ecological stakeholders together as part of future development of WHPF, possibly as part of the next stage of consultation and subsequent detailed design. LWT stressed the need to consider the long-term management of the site to ensure any investment is sustainable moving forward and that the ecological interest of the site is protected.
- 5.2.19 The Welsh Harp Conversation Group expressed major concerns about the proposed developments, noting that the proposals will cause significant damage and increased disturbance to the SSSI and the Welsh Harp/Brent Reservoir Local Nature Reserve resulting in a detrimental effect on the local wildlife.
- 5.2.20 The most significant concerns relate to the location of the high ropes course and tennis courts within the Local Nature Reserve boundary, the location of the wheeled sports facility and floodlighting from the ATPs.

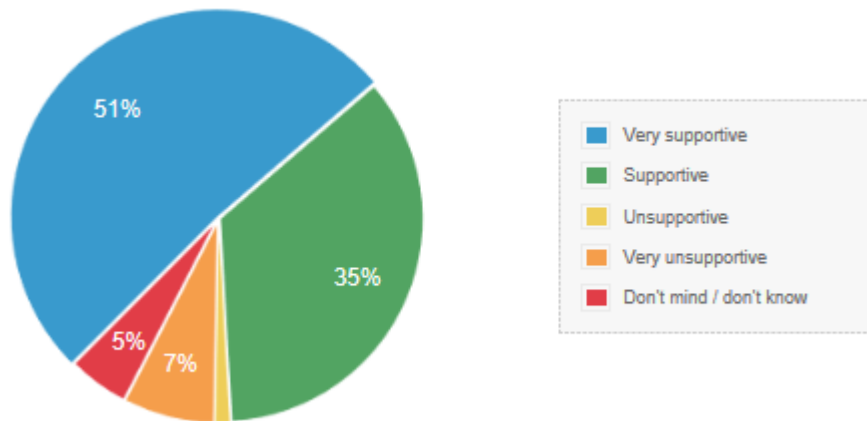
Public Drop-in Session – West Hendon Community Hub

- 5.2.21 The feedback from the public drop in session at the West Hendon Community Hub was also mixed. Whilst there was definite positivity about investment into the site with improved and new provision for users, there were significant concerns regarding the overall site management and the impact on the SSSI.
- 5.2.22 The North West London RSPB group, London Wildlife Trust volunteers in Barnet and other members of the local community expressed their concerns over the over-intensification of the site and the potential detrimental effect on the area's biodiversity.
- 5.2.23 Again, the location of the high ropes course, skate/BMX park and the tennis courts were identified as the biggest concerns of the proposed draft masterplan.

5.3 Questionnaire Feedback

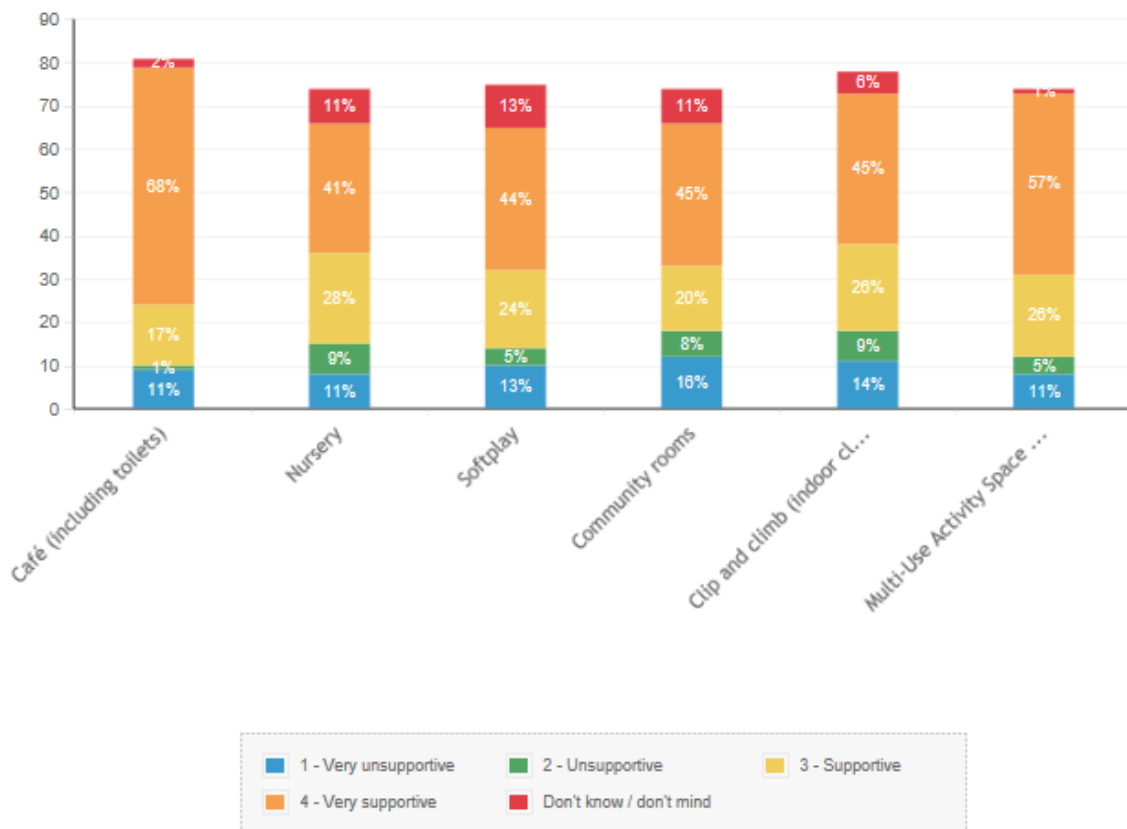
- 5.3.1 The online questionnaire was available for approximately 4 weeks from 5 November – 2 December 2018 and generated a total of 98 responses. A summary of the key findings is provided below and a copy of the report showing the full results can be found in Appendix 8: Report on Public Engagement.
- 5.3.2 The questionnaire asked respondents to rank their overall support for the draft masterplan proposals for WHPF.
- 5.3.3 Positively, 86% of respondents indicated they were either supportive or very supportive of the draft masterplan as demonstrated in Figure 12. Conversely, only 8% indicated they were unsupportive or very unsupportive.

Figure 12: Overall support for WHPF draft masterplan



5.3.4 More specifically, the questionnaire asked respondents to rank their support for the proposed indoor facilities in the draft masterplan. Respondents were asked to choose a score between 1 – 4, where 1 is very unsupportive and 4 is very supportive. The results are illustrated in Figure 13.

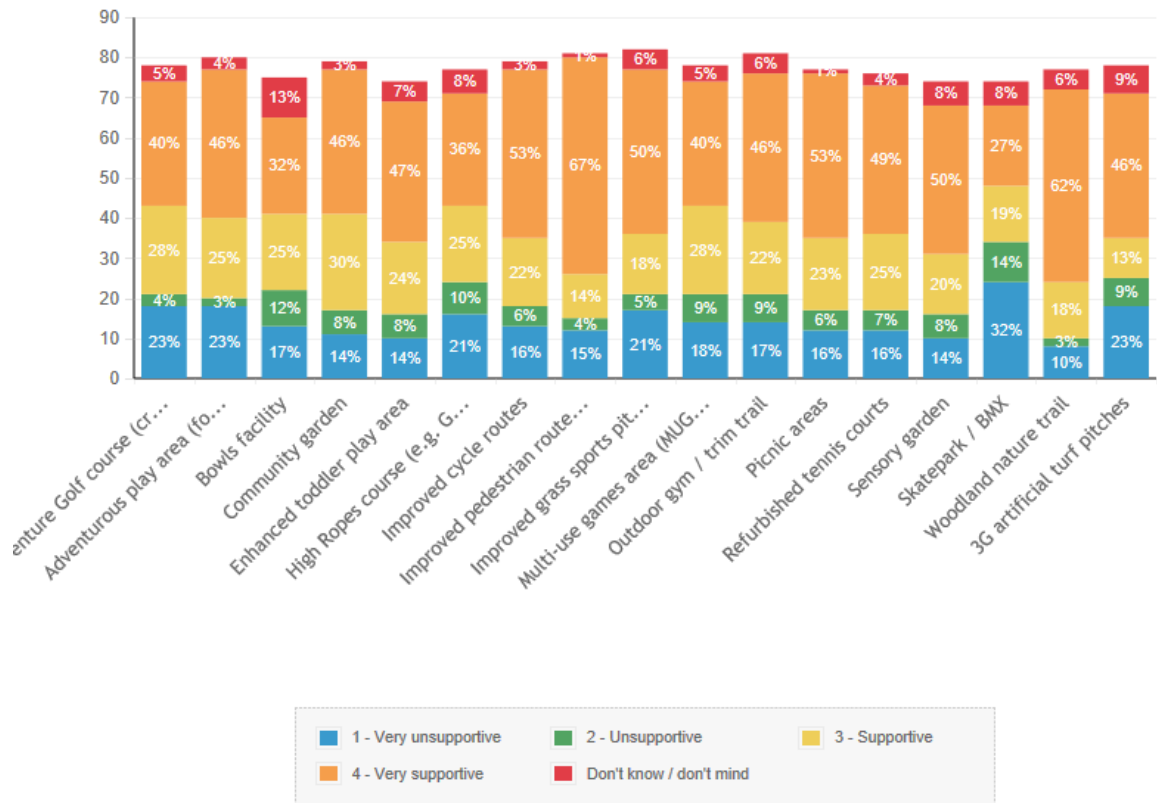
Figure 13: Support for proposed indoor facilities



5.3.5 These results demonstrate that there is strong support for all the proposed indoor facilities. Respondents were most supportive of the café and the multi-use activity space. Community rooms and ‘clip and climb’ received the least support from respondents but these negative figures were still relatively low (24% and 23% of respondents indicated they were either unsupportive or very unsupportive for these respective facilities).

5.3.6 The questionnaire also asked respondents to rank their support for the proposed outdoor facilities in the draft masterplan. Respondents were asked to choose a score between 1 – 4, where 1 is very unsupportive and 4 is very supportive. The results are illustrated in Figure 14.

Figure 14: Support for proposed outdoor facilities

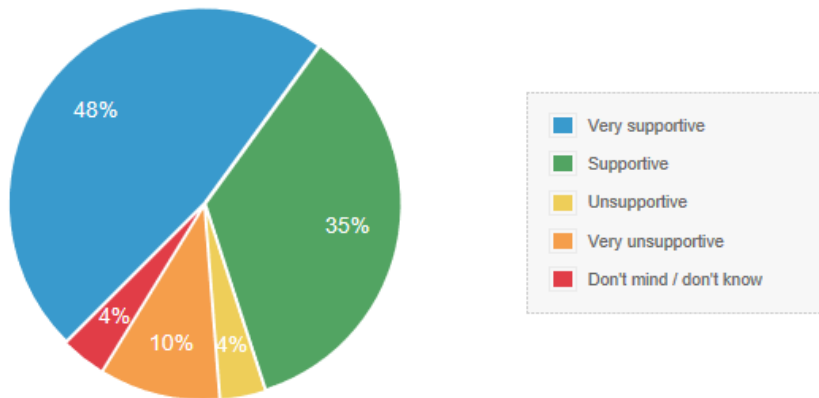


5.3.7 Overall, respondents were positive about many of the proposed outdoor facilities. Improved pedestrian routes ranked first with 81% of respondents indicating they were either supportive or very supportive. This was closely followed by the woodland nature trail (80%) community garden (76%), picnic areas (76%) and improved cycle routes (75%). Refurbished tennis courts and toddler and adventurous play areas also scored highly.

5.3.8 In terms of less positive responses, 46% of respondents indicated that they were either unsupportive or very unsupportive of the skatepark / BMX track. This was followed by 3G Artificial Turf Pitches (32%) and High Ropes Course (31%).

5.3.9 Finally, the questionnaire asked respondents to rank their support for the proposed layout and location of facilities within the draft masterplan proposals for WHPF. The results are summarised in Figure 15.

Figure 15: Support for the location and layout of proposed facilities within WHPF draft masterplan



5.3.10 Positively, 83% of respondents indicated that they were supportive or very supportive of the location and layout of the proposed facilities within the draft masterplan.

5.3.11 The questionnaire also provided respondents with a text box to make any further comments about the proposed draft masterplan. Common themes identified in response to this were as follows:

- The need to balance any development with the protection of the wildlife, flora and fauna on site
- Over-intensification of the site would impact on parking and traffic congestion in the area, in particular Cool Oak Lane
- These facilities are very much needed and would enhance the area
- The draft masterplan caters to different interests and age groups in the area
- Effective maintenance and management of the site will be critical for any new and improved provision.

5.4 Summary

5.4.1 Building on the successful initial engagement undertaken to inform Phase 1: Options Appraisal, SLC has undertaken further engagement with occupiers, users and stakeholders and the wider general public on the initial draft Masterplan for WHPF.

5.4.2 The process has been successful in gathering feedback from a wide range of interested parties and stakeholders and provides a solid evidence base from which the Council is able to consider the next steps.

5.4.3 The process has revealed broad overall support for the proposed development of the site and demonstrated an overarching desire amongst stakeholders and the wider public to create a space which provides opportunities for local people to be physically active. The need to provide better quality and more attractive facilities to match the wider regeneration of the area was a strong and consistent theme throughout the process.

5.4.4 The engagement has also drawn significant criticism of the draft masterplan from local conservation groups and individuals who are concerned about the impact of developments upon the SSSI and Local Nature Reserve.

- 5.4.5 A central theme running through all forms of engagement has been a strong desire to ensure that the overall site is managed more effectively in the future. Local stakeholders are keen to see a co-ordinated management plan that is properly resourced to ensure the proposed investments are protected, well-maintained and are sustainable in the long term.

6 FINAL DRAFT MASTERPLAN

6.1 Introduction

- 6.1.1 Following a thorough appraisal of the feedback obtained through the stakeholder and wider public engagement, SLC reviewed the initial draft masterplan to consider whether there might be any required changes as a result of this engagement.
- 6.1.2 A number of potential proposed changes were identified in light of the feedback received which were subsequently discussed and agreed with the Council's project team.
- 6.1.3 This section describes the changes agreed together with the rationale and presents the final revised version of the draft masterplan.

6.2 Agreed amendments to draft masterplan

Nursery provision

- 6.2.1 Following consultation with the existing nursery provider, it was agreed that the proposed area shown in the layout plan for the Community Sports Hub was too small. The accommodation schedule was increased to include an overall floor area similar to the existing nursery and the layout plan amended accordingly.

Figure 16: Revised Community Sports Hub plan



Tennis Courts

6.2.2 As described in Section 5, there were a number of concerns raised by local conservation stakeholders regarding the proposed location of the replacement tennis courts being within the boundary of the Local Nature Reserve and adjacent to the SSSI.

6.2.3 In view of these concerns, it was agreed to relocate the new tennis courts to an alternative location at the north of the site close to the proposed new MUGA. The tennis courts will not be floodlit.

Wheeled Sports Facility

6.2.4 There was also concern regarding the proposed location of the wheeled sports facility (skateboard / BMX), adjacent to the LNR and in close proximity of the SSSI.

6.2.5 In addition, consultation with a specialist designer of such facilities, suggested that such facilities generally work better when they are located closer to the main activity areas or central ‘hub’. This would also aid supervision of the facility.

6.2.6 As a result of this feedback, it was agreed that the wheeled sports facility be relocated to an area of the playing fields adjacent to the proposed orchard. The orchard would then be planted to wrap around the north of the facility to create a visual and acoustic buffer to neighbouring residential properties.

6.2.7 The facility is proposed to include an area for a traditional style skatepark but would also be designed to incorporate an area of multi-use pathway with ‘skate-able’ design features to encourage a more intergenerational and integrated use of space.

Other considerations

6.2.8 It was agreed that the new car park on Cool Oak Lane be ‘softened’ through use of a more permeable, natural surface finish and additional planting and low-level lighting be included on the pedestrian/cycle route from this car park to improve safety.

6.2.9 In light of the concerns raised regarding the proposed location of the high ropes course within the Local Nature Reserve, this was considered further by SLC and discussed with the Council’s project team.

6.2.10 The proposed location for the high ropes course is considered to be optimal as it can be integrated within existing mature woodland to maximise its appeal. An alternative location within a more open area of the site is likely to be less appealing and may therefore weaken the business case for its inclusion.

6.2.11 Furthermore, research into other similar facilities has revealed that precedents have been set elsewhere which demonstrate development within areas of designated ecological and natural interest. A number of examples highlighting this point are provided below:

- **Go Ape - Trent Park, London.** The development lies in the southwest corner of Trent Park Country Park, a Site of Metropolitan Importance for Nature Conservation and comprises approximately 13% of its area.
- **Go Ape - Forest of Dean, Gloucestershire.** The development is located in the impact zone of SSSI Nagshead. The forest is also the UK’s largest oak woodland.
- **Go Ape – Thetford.** The development is located in the impact zone of a SSSI.
- **Beamish Wild TreeTop Adventure - County Durham.** The development lies in the impact zone of three SSSI’s (Ridley Gill, Causey Bank Mires & Pockerley Farm Pond).
- **Harebreaks Adventurous Playground – Watford.** This site is located on the fringe of Semi Ancient Woodland and is a registered nature reserve.

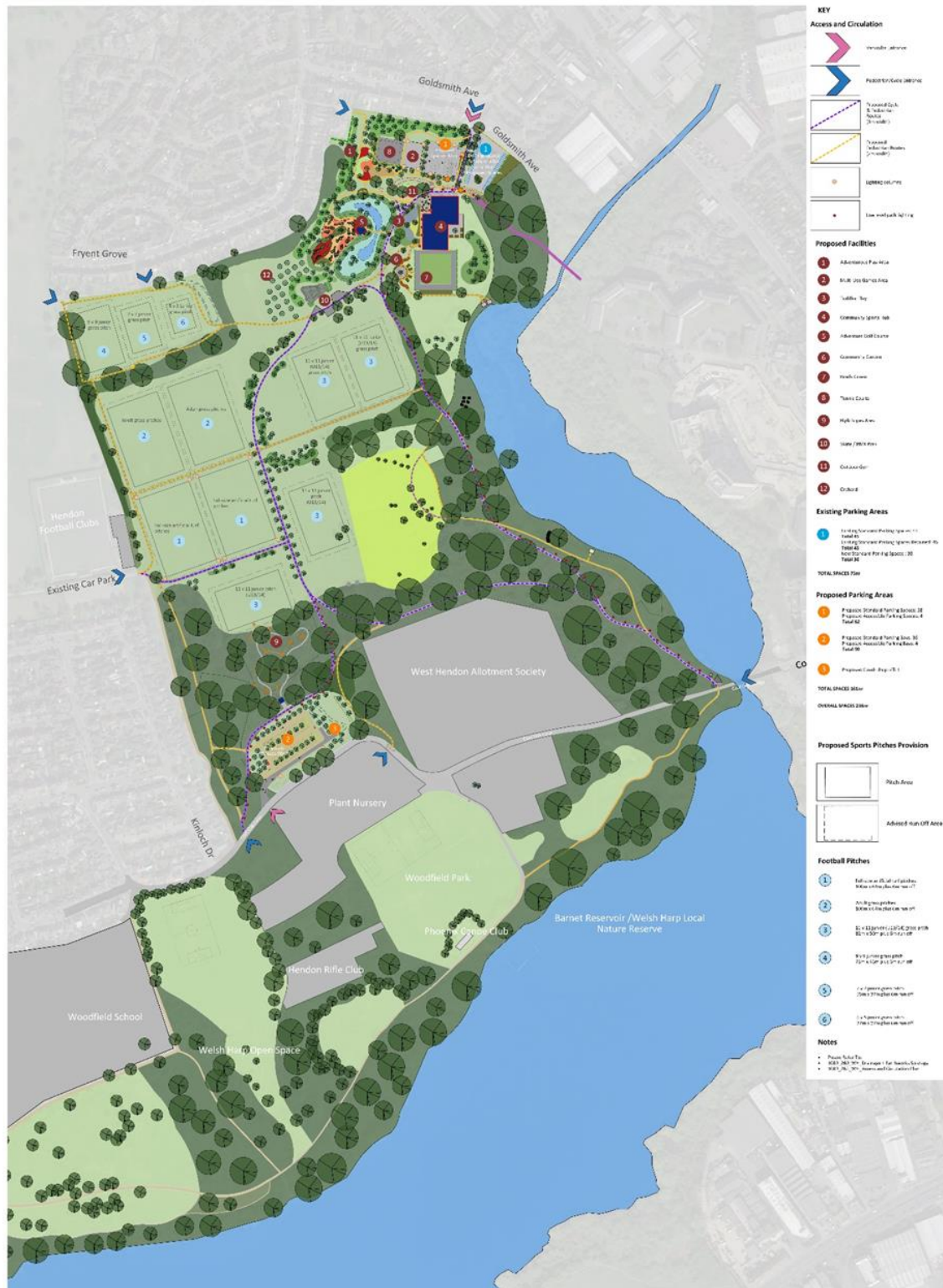
6.2.12 Of course, each case is different and considered by the planning authority in view of its unique and specific environment. However, in view of the points above regarding its appeal and the evidence of precedents set elsewhere, **at this stage** it is proposed to retain the high ropes in

its current location in the draft masterplan pending discussion with Natural England during the next stage of consultation.

6.3 Final Draft Masterplan

- 6.3.1 The amendments described above have been incorporated into a final draft masterplan shown in Figure 17.

Figure 17: Final Draft Masterplan



7 DEVELOPMENT COSTS AND DELIVERY PROGRAMME

7.1 Introduction

7.1.1 The development costs of the proposed facilities will be critical to establishing the overall financial viability of the masterplan for WHPF.

7.1.2 SLC, through its Associate Cost Consultants, Castons, has developed elemental budget estimates for each of the developments described in this report, details of which are provided in this section. Castons are a specialist leisure cost consultant and develop costings using recently tendered schemes rather than relying on benchmarked rates to provide the most accurate, up to date estimates possible.

7.1.3 Key to these costings is the development of a calculated assumption relating to the cost of inflation. This assumption is dependent upon an understanding of the likely delivery programme of the scheme in order to establish a projected midpoint for construction which is the most appropriate point from which to calculate inflation cost.

7.2 Development Costs

7.2.1 The development cost (construction and associated professional fees based at current cost) for each facility option is provided in Table 6. Full versions of the budget estimate for each proposal including an elemental breakdown of costs and details of all assumptions and exclusions are provided in Appendix 5: Budget Estimate.

Table 6: Facility Developments Budget Estimate (Q4 2018)

Facility Options	Development Cost Estimate
Indoor Facilities	
Community Sports Hub (incl. temporary facilities)	£4,726,000
Outdoor Facilities	
2 x 3G ATPs	£1,800,000
Grass Pitches	£200,000
MUGA	£145,000
Tennis Courts	£160,000
Wheeled Sports Facility	£580,000
Adventurous Play Area	£460,000
Toddler Play Area	£70,000
Adventure Golf Course	£295,000
High Ropes Course	£370,000
Outdoor Gym and Trim Trail	£150,000
Demolition, External Works and Landscaping	£3,126,000
Sub total	£12,082,000
Contingency (10%)	£1,208,000
Professional fees, surveys and Furniture, Fittings & Equipment (FFE)	£1,337,000
Inflation to construction midpoint (Q4 2022)	£3,070,000
TOTAL DEVELOPMENT COST	£17,697,000

- 7.2.2 The total cost of all investments is **£17.7M** which includes an allowance of £3.07M for inflation cost based on a midpoint of construction in late 2022. Tenders are based on inflation over the whole project duration and reflect the time for each element of work and material supply during the construction programme. The mid-point of the construction period therefore represents an approximate mean for the inflation allowance.
- 7.2.3 Castons refer to the Building Cost Information Service, provided by the RICS, for inflation prediction but couch this with their own experience and assessment of the nature and complexity of each project and location. Prediction of inflation is extremely difficult at present with uncertainty of free access of materials and labour from Europe which represents such an important element of the costs of construction and the ability to properly plan and programme construction works.
- 7.2.4 The construction procurement method, disposition of risk, constraints and abnormals will need to be considered as part of future delivery and to develop cost certainty on the project.

7.3 Delivery Programme

- 7.3.1 SLC has prepared a provisional delivery programme which is shown in Table 7 and sets out the different required workstreams and the timescales for each.
- 7.3.2 This programme has informed the allowance for construction inflation in the budget cost estimate described above. It assumes that the project would be funded, designed and constructed as one package. The package would include the community sports hub, external sports facilities, associated landscaping and external works.
- 7.3.3 It is envisaged that subject to consultation, the works would be phased. The first phase would be to relocate the nursery and martial arts tenants to other locations off-site. Temporary accommodation on-site would be set up for the bowls club and then demolition of the existing building could commence, whilst retaining a part of the existing car park for bowls club users only. At the same time the proposed car park off Cool Oak Lane could be constructed and open to the community early which can be used for access to Hendon Football Club.
- 7.3.4 Apart from access to the bowls club it is likely that public access to the northern part of the site will not be possible for a period within the contract during construction of the adaptation to Silk Stream bridge, car parking, Community Sports Hub, MUGA and adventure golf and associated drainage system. All contractor’s vehicles will have to access via Goldsmith Avenue which will affect programme and timing of deliveries.
- 7.3.5 It may be possible to retain community use of the pedestrian route skirting the Welsh Harp reservoir for a partial period during the construction works.

Table 7: Draft Delivery Programme

Workstream	Period	Date
Council authority to proceed (following March 2019 Environment Committee and further public consultation)		September 2019
Prepare brief and procure design team	16 weeks	Sept-Dec 2019
Appoint team, undertake surveys and specialist reports	16 weeks	Jan-April 2020
Design up to outline planning application including supporting documentation and further public consultation	24 weeks	May-Oct 2020
Outline planning application with reserved matters	13 weeks	Nov 2020 -Feb 2021
Detailed design	8 weeks	March-April 2021
Approval of reserved matters	8 weeks	May-June 2021

Workstream	Period	Date
Further detailed design	8 weeks	July-Aug 2021
Construction information	10 weeks	Sept-Nov 2021
Procurement and appoint contractor	16 weeks	Dec 2021-March 2022
Phased construction to completion	78 weeks	April 2022-Sept 2023
All facilities open to community		October 2023
Total	197 weeks	

- 7.3.6 It is clear from public engagement that, although the response to the overall proposal has been positive, there are doubts and even cynicism, that the scheme will ever come to fruition. If the above programme is followed there would be no evidence of construction on site until April 2022. This is approximately 3 years after the date of this report and, by that time, the quantity of completed and occupied units in the West Hendon redevelopment scheme will have significantly increased, but with no improvement to the external amenity space for those residents.
- 7.3.7 SLC believes that a solution needs to be found to bring forward elements of the scheme that would not be subject to a lengthy planning consent process. Subject to agreement with Council Planning Officers it is suggested that the playing pitch and associated drainage improvements work could be procured through a Council tender framework and carried out in 2019/2020. Footpaths and cycle routes outside the SSSI zone could also possibly be improved in this period. Similarly, the 3G ATPs could be brought forward through a framework and could therefore be delivered by Q1 2022.
- 7.3.8 SLC suggests that, given the risks and uncertainties attached to the inflation element within the budget cost estimate, the Council should examine ways in which the overall delivery programme could be condensed. This might include the use of design team and construction frameworks and phasing of works as suggested above.

7.4 Summary

- 7.4.1 The construction costs of all developments within the draft masterplan are estimated to be c. £12.1M. The contingency, professional fees and fit out costs are estimated to be c. £2.5M and the cost of inflation based upon a mid-point of construction of Q4 2022 is estimated to be c. £3.1M. **The total overall development cost of delivering the masterplan is therefore £17.7M.**
- 7.4.2 The provisional delivery programme developed by SLC shows a programme of 197 weeks. Assuming the Council approve development of the masterplan in September 2019 following the formal public consultation in the summer, all facilities would be operational in October 2023.
- 7.4.3 Given the considerable length of the delivery programme, SLC recommend that the Council explore opportunities to bring forward those elements of the scheme that would not be subject to a lengthy planning process. This phased approach would demonstrate progress on site and provide reassurance to local residents who have expressed doubts about the Council's commitment to delivering the scheme.

8 BUSINESS PLANNING AND FUNDING SOURCES

8.1 Introduction

- 8.1.1 High-level revenue business plans for each facility development have been developed by SLC to provide the council with an understanding of its future likely position in terms of an operational surplus or deficit for each of the proposed facility developments and the overall site.
- 8.1.2 A review of potential external funding sources and partners has also been undertaken to inform the Council's consideration of the business case.

8.2 Revenue Business Plans

- 8.2.1 SLC has developed 10-year revenue business plans for the proposed facility investments at WHPF. The business plans calculate an operational surplus / deficit based exclusively on revenue income and expenditure.
- 8.2.2 10 years is considered to be a suitable period over which to develop the business plans given that the all of facility investments are expected to have a lifespan of at least 10 years, and this would be a suitable contract length if outsourcing was considered to be a suitable management solution for the facilities.
- 8.2.3 Where possible, SLC has used existing financial data provided by the Council, supplemented by market research, supply and demand analysis, benchmarking against similar facility types, industry knowledge and experience-based forecasting to inform the development of the business plans.
- 8.2.4 The business plans include a high-level assessment of all additional income and expenditure associated with the new facilities including 'below the line' costs such as operator profit and support costs where appropriate.
- 8.2.5 Additional grounds maintenance expenditure resulting from increased usage of the site has been estimated at £50,000 per annum.
- 8.2.6 The business plans assume a concessions contract for the café and Nursery. An externalised management model with a standard, fixed management fee arrangement with an operator has been assumed for all other facilities on site.
- 8.2.7 The overall revenue position for the Council is determined by the residual of surplus income after all expenditure (including 'below the line' costs) have been deducted. Inflation is applied to income and expenditure for each investment proposal at an annual rate of 2%.
- 8.2.8 The business plans developed by SLC are a robust, transparent and independent assessment of projected income and expenditure based on industry knowledge and benchmarking of similar developments including key ratios on central support costs and retained profit levels. However, any projected operational surpluses shown within this section are indicative only and designed to support the Council in exploring the business case for investment.

8.3 Facility Development Options Business Plans

- 8.3.1 The business plans for each of the facility developments have been developed independently, to enable each of them to be considered individually in terms of their financial performance and subsequent return on investment.

8.3.2 All of the additional income projections, with the exception of those being considered as concessions contracts, have been profiled to allow for a growth period in Years 1 and 2 before reaching maturity or ‘steady state’ by Year 3. The additional income is assumed to be 70% of ‘steady state’ income for Year 1 and 85% for Year 2.

Grass Pitches

8.3.3 Projections for the additional income generated by the improvement and addition of grass football pitches are based on an estimation of casual and block bookings per season.

8.3.4 The business plan assumes 2 seasonal bookings per pitch and assumes 5 casual bookings per season per pitch. There are nine pitches, varying from adult to mini-soccer size. Based on existing council hire rates, the hire of 9 pitches would generate income of £17,000 p.a.

8.3.5 Additional expenditure costs to account for additional repairs and maintenance requirements are estimated at £41,500 for the 9 pitches. This is based on Sport England Natural Turf Pitch Guidance on typical repair and maintenance costs for grass pitches.

Artificial Turf Pitches (ATPS)

8.3.6 Projections for the additional income generated by 2 new artificial turf pitches (ATPs) are based on an estimated number of weekday and weekend visits per week based on the pitch being available for hire 87 hours per week, 50 weeks per year. Estimated occupancy rates are set at 40% for pitch 1 and 30% for pitch 2.

8.3.7 The business plan assumes that the ATPs will be available for hire as full pitches and in 1/3 sections for which the following hire charges, in accordance with local market rates, are applied:

- Full pitch – Commercial hirer: £110
- Full pitch— Community hirer: £55
- 1/3 Pitch - Commercial hirer - £50
- 1/3 pitch – Community hirer - £25.

8.3.8 Commercial hirers refers to operators running, for example, weekday leagues and charging participants in order to make a profit. Community hirers refers to community sports clubs, schools etc.

8.3.9 For the purposes of this business plan, it is assumed that all three sections of the pitch have been hired when the pitch is “occupied” and that occupied hours are divided as follows:

- Full pitch – commercial hire: 20%
- Full pitch – community hire: 35%
- 1/3 pitch - commercial hire: 15%
- 1/3 pitch - community hire: 30%.

8.3.10 This generates a total income of £216,956 per annum across the two pitches.

8.3.11 Additional staffing costs are based on the need for an additional 0.5 FTEs to manage facility bookings. Operational costs are estimated at 8% of income and repairs and maintenance costs of £15,000 per pitch (based on Football Foundation guidance) have been included.

Concessions – Café and Nursery

8.3.12 Projections for the additional income generated by the café within the Community Sports Hub and the replacement of the existing nursery are based on an assumed concession payment being made to the Council for the operation of the facilities.

8.3.13 The concession rate for the park café, payable by the operator to the Council, has been estimated at £25,000 per annum based on comparable facilities. It is assumed that operational costs are the responsibility of the operator. Landlord costs, in terms of repairs and maintenance etc. have been estimated at £7,500 per annum.

8.3.14 The concession rate for the Nursery, payable by the owners to the Council has been set at £37,000 per annum based on current arrangements. It is assumed that operational costs are the responsibility of the operator. Landlord costs, in terms of repairs and maintenance etc. have been estimated at £7,500 per annum.

Community Rooms (within Community Hub)

8.3.15 Income projections for the 2 community rooms in the Community Sports Hub are based on the hire of the rooms by community and commercial groups.

8.3.16 The rooms are assumed to have an availability of 90 hours per week across 50 weeks a year, and a total occupancy of 30%. It is assumed that 45% of bookings will be by commercial hirers at a rate of £20 per hour and the remaining 55% of bookings will be by community groups at a rate of £10 per hour.

8.3.17 Community room hire is estimated to generate a total of £39,150 per annum.

8.3.18 Additional expenditure has been estimated based on staffing costs for 0.25 FTEs to manage bookings and administration (a total resource of 0.5 FTEs to be shared with the Multi-use Activity Studio below) and operational costs estimated at 15% of additional income (maintenance, utilities, cleaning etc.).

Multi-use Activity Studios

8.3.19 Projections for the additional income generated by the multi-use activity studios within the Community Sports Hub are based on a programme of studio hires by community groups and organisations and an exercise class programme.

8.3.20 For the purposes of this business plan Studio 1 has been designated for club hire and a total estimated occupancy of 30% of its total weekly availability (90 hours) has been applied. It is assumed that 1/3 of hires are by commercial groups / clubs at a rate of £40 per hour and 2/3 of hires at by community groups and clubs at a rate of £20 per hour.

8.3.21 Studio 2 has been designated for an exercise class programme for which participants are charged an individual rate. A total annual attendance of 15,000 has been estimated based on a studio capacity of 25 people, estimated occupancy of 40% and programme of 30 classes per week over 50 weeks a year.

8.3.22 It has been assumed that 75% of class attendees will pay a full price rate of £8 and 25% will pay a concessionary rate of £4 (prices based on pay & play class rates charged by the Council's current leisure operator GLL).

8.3.23 The two studios combined generate a total estimated income of £141,000 per annum.

8.3.24 The additional expenditure projections take account of the increased staffing costs to cover bookings and administration (0.25 FTE's), instructor costs for Studio 2 classes and an assumed increase in operational cost at 15% of additional income (maintenance, utilities, cleaning etc.)

Soft play and Clip and Climb

8.3.25 Projections for the income generated by soft play and clip and climb are based on an estimated number of weekend and weekday visits and children's party bookings per week based on the facility being open for 50 weeks of the year. Income projections for soft play and clip and climb facilities have been estimated based on the following assumptions:

- **Soft play** – 25 weekday visits with an average yield (income per visit) of £4.00 per visit and 50 weekend visits with an average yield of £6.00. 5 children’s party bookings per week with an average yield of £120.
- **Clip and Climb** – 30 weekday visits with an average yield of £13.00 per visit and 60 weekend visits with an average yield of £16.00. 5 children’s party bookings per week with an average yield of £150.

8.3.26 This generates total income of £231,000 per annum from the clip and climb facility and £85,000 from soft play. Pricing is based on that in comparable facilities elsewhere.

8.3.27 The expenditure projections take account of staffing requirements at a total cost of £43,800 for soft play and £108,600 for clip and climb plus operational costs estimated at 15% of income.

8.3.28 The staffing costs include a general supervisor managing both activities, 3 FTE instructors for clip and climb and a reception function shared between the two indoor activities (a total of 3 FTEs).

Outdoor Activities

8.3.29 Income projections for the new adventure golf course are based on an estimated number of weekday and weekend visits per week based on the course being open for 50 weeks per year. An estimated 150 weekday visits per week with an average yield of £7.00 and 260 weekend visits per week with an average yield of £9.00 generates income of £169,500 per annum.

8.3.30 Additional income is generated through an average of 5 children’s parties per week with an average yield of £120 per party. This generates a further £30,000 of income per annum.

8.3.31 Average visit and party yields are based on prices at comparable local facilities.

8.3.32 The additional expenditure projections take account of staffing requirements (1.5 FTE’s) and additional operational costs as a proportion of income (maintenance, utilities, admin etc. – estimated at 15% of income).

8.3.33 Income projections for the new high ropes course are based on an estimated number of weekday and weekend visit per week based on the course being active for 50 weeks per year. An estimated 100 weekday visits per week with a yield of £20.00 and 160 weekend visits per week with a yield of £25.00 generates income of £300,000 per annum.

8.3.34 Additional income is generated through an average of 5 children’s parties per week with an average yield of £150 per party. This generates a further £37,500 of income per annum.

8.3.35 Secondary sales are estimated at 10% of visit income (excluding children’s parties) generating a further £30,000 per annum. This secondary sales income includes the sale of equipment for high ropes e.g. gloves etc.

8.3.36 Additional expenditure projections for the high ropes course take account of staffing requirements which include a full-time supervisor, instructors (6 FTE’s) and receptionist / administrators (3 FTE’s).

8.3.37 Additional operational costs (including maintenance, utilities, cleaning, administration etc.) are estimated at 15% of income.

Car Park

8.3.38 The Council is currently exploring options for the implementation of car park charges across its portfolio of parks and open spaces. Based on the Council’s modelling and the size of the

car parks proposed in the draft masterplan, this could provide c. £83k of additional income per annum.

8.4 Business Plan Summary

8.4.1 A full 10-year business plan summary for the whole-site masterplan development is shown in Appendix 6: Business Plan Summary. This includes the additional income and expenditure generated by each facility investment options together with proportionate additional central support and operator profit costs using benchmarked ratios where applicable.

8.4.2 The operational subsidy or surplus generated by each facility investment option, excluding “below the line” central support and operator profit costs is summarised in Table 8. This also includes the total revenue position for the whole site development, including all “below the line” cost projections.

Table 8: 10-year Average Business Plan Summary

Facility	10-year average Surplus / (Subsidy)
Grass Football Pitches	-£27,591
ATPs	£159,454
Tennis Courts	£1,439
Café	£19,162
Nursery	£32,302
Community Rooms	£28,752
Multi-Use Activity Space	£83,784
Clip n Climb	£85,620
Soft Play	£27,301
Adventure Golf	£150,363
High Ropes	£87,566
<hr/>	
Grounds Maintenance Costs	-£54,749
Central Support Costs	-£107,495
Operator Profit	-£80,622
<hr/>	
Whole Site Masterplan	£405,286

8.4.3 This shows that the majority of facility investment options proposed for the site, with the exception of grass football pitches, generate an operational subsidy of some form before “below the line” costs are taken into account.

8.4.4 Over the 10-year business plan period, it is projected that an average annual revenue surplus of c. £405,000 would be generated by delivering all of the facilities included in the draft masterplan. Any changes to the final facility mix or phasing of delivery will impact upon this figure. Given the projected timescales for delivery, the business plan will need to be regularly reviewed at different stages of the project to take account of any changes in the market.

8.4.5 It should be noted that the business plan does not currently include any capital cost repayments should the developments be funded, or part funded through prudential borrowing.

8.5 Potential Funding Sources

- 8.5.1 This section provides a review of capital grant funding that may be available to help the Council fund the proposed developments at WHPF.
- 8.5.2 SLC has examined over 40 funding streams distributed through a variety of grants available from a range of sources, such as the European Union, central government, local authorities and charitable organisations. These funding agencies cover a variety of areas from which the site developments could attract investment, including; sport and physical activity, youth development, urban regeneration, disability equalities, health and wellbeing and general community-focused activities.
- 8.5.3 The economic restrictions faced by public funded bodies has meant many of the general grant-giving foundations are limiting their grant-giving programmes because of a general reduction in available funds. A majority of the foundations' income comes from large sums of inheritance money being invested in stocks and shares. The economic slowdown and the impact of political uncertainty surrounding Brexit, has led to the value of these stocks and shares being reduced.
- 8.5.4 For any project to be successful in attracting grant funding it will need to demonstrate the wider community benefits of the proposed project (e.g. increase in participation, reduction in anti-social behaviour and increased community pride). Any facility development project will need to meet important grant funding criteria including:
- Providing inclusive and accessible facilities which are attractive to all sections of the local community
 - Establishing multi-use and multi-sport facilities and activities, and having a high and long-lasting impact on participation, performance and retention levels
 - A sustainable business plan with adequate revenue funding in place to support the long-term delivery of high-quality services and activities
 - Consideration of a likely level of match funding, which varies from funder to funder, to be between 25-50% of the total project cost. This match funding is required by the lead applicant (Council or a community sports club/organisation/charity) or another source of grant funding.
- 8.5.5 The project has the potential to attract funding from a wide range of sources due to the proposed diversity of services (i.e. sport and physical activity, community services, ecological and educational programmes). This section summarises the main funding streams which the Council may consider exploring further.

Sources of Grant Funding

- 8.5.6 The most significant amount of grant funding available to the Council is from National Lottery funding which is allocated through Sport England. With a national remit, divided into regions, Sport England funds projects that help people get involved in sport and physical activity. Through these funding streams, such as the Strategic Facilities Fund and the Community Asset Fund, the money received can be put towards refurbishment costs, the building of new facilities, or used to develop activities that improve health and education within local communities.

Table 9: Sources of Grant Funding available to Local Authorities

Grant Distributor and Name of Fund	Description	Available funding	% of Match Funding required
Sport England – Strategic Facilities Fund	<p>Development of sustainable environments capable of supporting local outcomes</p> <p>Collaborative (cross-sector and boundaries)</p> <p>New opportunities to encourage people to live healthier and more active lifestyles.</p>	Maximum of £500,000	25% of total project costs
Sport England – Community Asset Fund	<p>Improve and protect existing sports facilities that support the needs of local communities.</p> <p>Invest in new and different places that meet the needs of local communities, which include SE target audiences</p> <p>Ensure SE capital investment reaches organisations who have not accessed SE funding before.</p> <p>Create a more resilient, sustainable, less grant dependent sport sector.</p> <p>Preference for funding organisations that haven’t received Sport England funding before, particularly for larger awards (£50k+)</p>	<p>Maximum of £150,000</p> <p>Investments ranging from £50,000 to £150,000 by exception when organisations demonstrate considerable impact or are targeting under-represented groups.</p>	None
London Marathon Charitable Trust – Major Capital Projects Grant	<p>Facilities funding to encourage and support all members of local community to become and remain physically active.</p> <p>Strategic Partnership Grants (invitation only) for large scale ambitious projects that challenge inequality of access to physical activity</p>	<p>£20,000 - £150,000</p> <p>Grants of £150k+ available for particular projects</p>	Not specified but preference for being part of funding package with other funders or self-funding
Big Lottery Fund – Reaching Communities England	<p>Projects must address one or more of the following outcomes:</p> <ul style="list-style-type: none"> • People have better chances in life, with better access to training and development to improve their life skills • Stronger communities, with more active citizens, working 	<p>Flexible funding over £10k for up to five years.</p> <p>Maximum capital funding of £100,000.</p>	Not specified

Grant Distributor and Name of Fund	Description	Available funding	% of Match Funding required
	<p>together to tackle their problems</p> <ul style="list-style-type: none"> Improved rural and urban environments, which communities are better able to access and enjoy Healthier and more active people and communities. 		
Football Foundation – Premier League and The FA Facilities Fund	<p>Building or refurbishing grassroots facilities for community benefit.</p> <p>Improve facilities for football and other sports in local communities.</p> <p>Sustain or increase participation amongst children and adults, regardless of background, age or ability.</p> <p>Help children and adults to develop their physical, mental, social and moral capacities through regular participation in sport.</p>	A maximum of £500,000 given.	Demonstrate financial need for grant aid and provide evidence that all available options for match funding have been exhausted.
Lawn Tennis Association – Community Tennis Fund	<p>Facilities that demonstrate potential for sustainable participation growth for public access and community use.</p> <p>Priority given to applicants with detailed tennis development plan.</p> <p>Barnet within a priority area for LTA.</p>	<p>Maximum of £150k funding available.</p> <p>Typically funding allocated with 50:50 loan to grant ration.</p>	Minimum of 25% for floodlights, outdoor tennis facilities or clubhouses; often up to 50%.
Playing Fields Legacy Fund	<p>Get more people, especially the young and disadvantaged, playing more outdoor sport through more effective use of playing fields.</p> <p>For pitch improvements, new pitches and renovation of ancillary facilities.</p>	Up to £10k.	Not specified. Typically used to unlock funding from other partners.

Grant Distributor and Name of Fund	Description	Available funding	% of Match Funding required
Landfill Communities Fund	<p>Tax credit scheme enabling operators of landfill sites in England and Northern Ireland to contribute money to organisations enrolled with ENTRUST as Environmental Bodies (EBs).</p> <p>EBs carry out projects in England, Northern Ireland and Wales that comply with a range of objectives including:</p> <ul style="list-style-type: none"> • reclamation of unusable land • prevention or remediation of effects of pollution • improvement of park or public amenity • conservation or promotion of biodiversity. <p>Site must be in the vicinity of a landfill site.</p>	Various.	Not specified.

8.5.7 The majority of these funds are available to community organisations such as sports clubs, charities and trusts as well as statutory bodies, and in some cases it may be deemed more appropriate for a club or community organisations to be the main applicant to a specific fund. In the majority of cases, this community organisation would benefit from being able to evidence the support, primarily in the form of funding, from the local authority. It would also typically have to demonstrate security of tenure of the site, with the minimum length required dependent on the amount of funding applied for. Typically, funders will require security of tenure for 25+ years for larger grants to be considered.

8.5.8 There are also some grant-making trusts that provide money to charities or trusts specifically to further their own charitable objectives.

Table 10: Grant funding available to Registered Charities

Grant Distributor and Name of Fund	Description	Available funding	% of Match Funding required
Garfield Weston Foundation	Grants made to UK organisations across the following categories: Arts, Education, Youth, Health, Community, Environment.	Up to £100,000.	Not specified.
Trusthouse Charitable Foundation	Trusthouse Charitable Foundation provides grants for running costs or one-off capital costs to charities and	Up to £45,000.	Not specified.

Grant Distributor and Name of Fund	Description	Available funding	% of Match Funding required
	<p>not-for-profit organisations. A particular focus is urban deprivation.</p> <p>Most relevant theme would be Community Support: projects in deprived communities; the provision of sporting facilities or equipment.</p>		
The Thompson Family Charitable Trust	<p>The Thompson Family Charitable Trust provides grants to registered charities in the following fields:</p> <ul style="list-style-type: none"> • Health and social welfare • The Arts • Sports • Education • Animal welfare • Medical research. 	<p>Most grants up to £50k, a few between £100k-200k.</p> <p>Up to £500k in exceptional circumstances.</p>	Not specified.
Bernard Sunley Foundation	<p>Capital projects undertaken by UK registered charities or Community Amateur Sports Clubs (CASC).</p>	Up to £30,000.	Not specified.
Fidelity UK Foundation	<p>Focus on community development, health and education.</p> <p>Investment is typically directed to specific projects in the following categories:</p> <ul style="list-style-type: none"> • Capital improvements such as new construction, renovations, expansions and equipment • High impact information technology projects • Organisational development projects • Planning initiatives. 	Up to £100,000.	Not specified.

Other Sources of Capital Funding

- 8.5.9 Capital reserves built up by the local authority or capital receipts from land or property disposal can be used to fully or part-fund facility developments where available.
- 8.5.10 A common source of funding for local authority capital schemes is prudential borrowing through the Public Works Loan Board. The capital repayments and financing costs are usually met by the revenue savings generated by the new facility(s). The extent to which the Council is prepared to borrow is generally dictated by the amount of surplus the new facility is projected to generate.

- 8.5.11 Section 106 or Community Infrastructure Levy (CIL) payments from local developments may also be pooled to help contribute to the cost of new leisure and open space facilities or developments, albeit these are subject to competing priorities. For example, S106 funds of £979,000 have been secured from the West Hendon Regeneration project and allocated for 'Leisure and Recreation' across WHPF, Woodfield Park and the Welsh Harp.
- 8.5.12 A Public Private Partnership (PPP) funding approach has different routes to delivery but is based upon a long-term (often c. 20+ years) agreement between the local authority and a private operator to jointly fund the new facility. One route is through a Design, Build, Operate and Maintain (DBOM) agreement where a preferred operator is selected through a tender process to manage the design and build of the facility and then to operate and maintain it. The local authority still funds the majority of the cost but has secured a long-term partner to take on the design and build risk and pay a management fee which should support the repayment of any borrowing.
- 8.5.13 An alternative route is through a Design, Build, Finance and Operate (DBFO) agreement which is similar to the DBOM route but the operator is required to provide most or all of the funding.
- 8.5.14 The PPP route is often preferred for authorities with limited client-side resource and wishes to transfer construction risk (budget/programme) to the operator.

8.6 Summary

- 8.6.1 High-level revenue business plans using industry benchmarked financial ratios for each facility development have been developed by SLC to provide the Council with an understanding of its future likely position in terms of an operational surplus or deficit for each of the proposed facility developments and the overall site.
- 8.6.2 The business plans have been developed on the assumption that the scheme will be fully funded by the Council. However, there may be options for capital funding to be provided by an external operator(s) subject to suitable arrangements. This approach should therefore be considered and reviewed accordingly by the Council when developing the funding model.
- 8.6.3 Over the 10-year business plan period, it is projected that an average annual revenue surplus of c. £405,000 would be generated by delivering all of the facilities included in the draft masterplan. Any changes to the final facility mix or phasing of delivery will impact upon this figure. Given the projected timescales for delivery, the business plan will need to be regularly reviewed at different stages of the project to take account of any changes in the market.
- 8.6.4 The business plan illustrates the relative strengths and weaknesses of each facility development in terms of financial performance. All developments, apart from the grass football pitches, are projected to generate a revenue surplus. The Artificial Turf Pitches and Adventure Golf Course provide the strongest return followed by the High Ropes Course, Clip and Climb and Multi Use Activity Studios.
- 8.6.5 There are a number of potential grant funding sources available to the Council and other stakeholders. Each of these will have specific criteria to meet and are worthy of further exploration as the masterplan develops through more detailed design stages. However, it is not possible at this stage to assess the Council's likely chances of success.

9 MANAGEMENT OPTIONS

9.1 Introduction

- 9.1.1 Alongside the design of the masterplan and the work on feasibility, SLC has considered potential management models for the site to ensure the Council's investment is protected, well maintained and managed effectively and sustainably over the long-term.
- 9.1.2 The Council's parks are currently managed directly through an in-house management model by the Green Spaces team.
- 9.1.3 This section of the report identifies some of the options for future management arrangements which the Council may wish to explore. These have been identified through our own research and experience of parks management models and through consultation with the Council, current occupiers/users and external operators. It is not designed to be an exhaustive list but does cover the main recognised options and provides a starting point from which the Council can explore further.
- 9.1.4 It also includes an initial evaluation of the identified management models using a set of financial and non-financial criteria agreed with the Council.

9.2 Identification and Appraisal of Management Models

- 9.2.1 This section describes a range of potential management models for WHPF and its proposed mix of facilities, supported by relevant case studies and provides an outline of the advantages and disadvantages of each model.

Option 1 – In house / Direct delivery

- 9.2.2 The Council currently manages the overall site maintenance including the grass pitches, pathways and car park, has lease arrangements in place with Hendon Bowling Club, Parkside View Nursery and Chin Woo Martial Arts for sections of the pavilion building and directly manages the changing rooms and pitch bookings.
- 9.2.3 The Council has the option of taking on the overall direct management of all newly developed facilities on the site, including those within the proposed Community Sports Hub. As owners of the site, the Council would be free to assume direct management, subject to agreement on the terms of any required early termination of existing leases.
- 9.2.4 Such an arrangement would significantly extend the Council's current landlord and site maintenance responsibilities to include the overall management of all facilities and the delivery of all services and programmes across the site. The Council would therefore need to put in place a new staffing structure and operating and asset management systems to ensure effective, efficient and safe management of the site.
- 9.2.5 The Council would assume full responsibility for all income and expenditure and take on full commercial risk in relation to any future changes in market conditions. It would be responsible for ensuring facilities are properly maintained including full lifecycle replacement of assets and that services and programmes are innovative, effectively marketed and continually meeting the needs and expectations of users.
- 9.2.6 The Council would be responsible for the employment, welfare and ongoing training of all staff, including specialist sports and fitness instructors, nursery staff, catering, reception and management staff. There would also be a requirement to provide central support services such as HR, finance and I.T and the site would need to be allocated to an appropriate service area e.g. Sport and Physical Activity for ongoing management support and strategic direction.

Case Studies

9.2.7 The combination of proposed facilities as part of the masterplan for WHPF are somewhat unique and so providing directly comparable case studies for this management model option is not straightforward. Furthermore, it is rare for local authorities to directly manage *all* elements of such a range of provision and so although the following case studies describe services that are predominantly managed in-house, they include some elements of outsourced provision.

Case Study: Nottingham City Council, Nottingham

9.2.8 Nottingham City Council looks after 136 parks and gardens across the city. This includes large tourist attractions and smaller neighbourhood parks. The Council is also responsible for natural sites which are rich in wildlife and biodiversity. These sites are managed directly by the Council's Parks and Open Spaces Service.

9.2.9 The service generates 50% of its annual budget from commercial income. Sources of income include the marina at Colwick Country Park, "Nottingham in Bloom" sponsorship, issuing fishing licences, hosting events, pitch and putt, boating and sports facilities. All of these activities are provided 'in-house' rather than contracting with external organisations to supply these.

9.2.10 The Council uses external contractors to deliver car parking for football matches and its on-site cafés and mobile catering. The Council has in recent years invested in the development of cafés on several of its sites to create destination parks. The contracts to run the catering are publicly tendered with the Council receiving a fixed ground rent and a proportion of total sales for these concessions.

Case Study: Merton Council, London

9.2.11 Merton Council directly manages 63 parks, sports grounds and open spaces across the borough including sports pitches, tennis courts, MUGAs, pavilions, community rooms, events space, paddling pools, crazy golf and pitch and putt. Some of these open spaces include areas of biodiversity and ecological interest.

Advantages

- The Council would retain full control over the service and could deliver programmes which fully meet its strategic priorities (subject to financial performance) and be able to flex these programmes in response to changes in strategic direction and local need.
- The Council would directly benefit from any financial over-performance arising from higher than expected income levels or lower than expected expenditure.
- Councils are generally viewed as a 'safe pair of hands' and direct management may be perceived as providing a stronger sense of 'community ownership' amongst local people, particularly those who are opposed to the externalisation of Council owned assets and services.

Disadvantages

- The model is likely to be less efficient than outsourcing to a specialist operator and will therefore provide a sub-optimal solution in terms of the financial position.
- The Council would be exposed to the risk of financial under-performance from lower than expected income levels or higher than expected expenditure. This makes medium term financial planning more difficult.

- The service would be exposed to the risk of continuing budget reductions which could lead to a deterioration in service quality, lifecycle investment and a reduction in targeted interventions and programmes for those most in need.
- The Council does not currently have the specialist expertise and experience of managing many of the proposed new facilities and may not be best placed to deliver ongoing innovation and continuous improvement in terms of service quality.
- The service would be exposed to the risk of political intervention linked to a relatively short-term political cycle and may therefore be subject to uncertainty or changes in strategic priorities.
- The Council may not have the capacity to provide the necessary management and central support required to ensure the site achieves its strategic objectives and remains financially sustainable over the longer term.
- There would be limited economies of scale due to the Council not directly managing any comparable existing facilities.
- There would be significant set up costs in fitting out the new facility, employing staff, developing operating systems and setting up central support services.

Option 2 – Outsourcing to single external operator

- 9.2.12 The Council may choose to outsource the management of the site to a private leisure operator or leisure trust. The Council would retain ownership of the site and its assets and contract with an operating partner to deliver the service on its behalf.
- 9.2.13 The service would be strategically driven by the Council through a detailed services specification with clearly defined required outputs and standards and a robust performance management framework.
- 9.2.14 This approach to outsourcing would align with that adopted for the commissioning of the leisure centres service although the Council has the option to design the core requirements of the services in a different way if it chooses to.
- 9.2.15 The contract with the selected operator would likely be based upon a strong partnership philosophy established through an agreed set of shared values and required outcomes. The service remains a Council service but would be delivered on their behalf by the specialist operator and characterised by close collaboration and partnership working.
- 9.2.16 The contract can be set up in a range of different ways in terms of length, scope, risk profile and financial arrangements. Typically, the cost of the service (management fee to / from the Council) is fixed and binding for the term of the contract (often 10 years+) and can be set at an annualised, average fee or a ‘profiled’ fee to account for projected increases/decreases in income and expenditure. Either way, the cost is typically fixed and provides full transparency in terms of the Council’s medium-term revenue position for the service.
- 9.2.17 The Council would be able to set up the contract in a way which best reflects its approach to risk share, particularly in relation to maintenance responsibilities and lifecycle replacement. This may include passing all of the maintenance risk to the operator or sharing responsibility through a more traditional landlord/tenant arrangement. For example, the Council may choose to retain responsibility for grounds maintenance of the site as it is able to bring economies of scale through its management of grounds maintenance across the borough.
- 9.2.18 The contract may also be set up to ensure that existing clubs and providers i.e. Hendon Bowling Club, Parkside View Nursery and Chin Woo Martial Arts are protected and able to

continue operating. Such arrangements can be structured in a number of different ways to ensure they meet the requirements of all parties.

- 9.2.19 Depending upon the expertise and experience of the selected operator, it may be that they choose to sub-contract certain facilities e.g. high ropes, to a specialist provider. The selected operator would remain the Council's primary contractor and main contact but assume responsibility for managing the sub-contractor(s) in accordance with the services specification.

Case Study: Croydon Council – Greenwich Leisure Ltd

- 9.2.20 As part of the 20-year leisure management contract with Croydon Council let in 2017, Greenwich Leisure Ltd (GLL) manage the Council's football pitches and tennis courts located in their parks. This includes the day to day operation, programming and maintenance of these facilities. Approximately 30 football pitches and tennis courts are included in the contract and GLL has responsibility for increasing the numbers of users and takes full risk on associated income and expenditure.

- 9.2.21 As part of the new contract arrangements, GLL committed to invest into the parks, developing outdoor tennis hubs and outdoor activity programmes. GLL also operates the newly refurbished Old Ashburton Library in Ashburton Park, a Community Hub providing a combination of community rooms, fitness activities and events as well as hosting a café and nursery.

Case Study: Lambeth Council – Greenwich Leisure Ltd

- 9.2.22 As part of the leisure management contract with Lambeth Council to manage its major indoor leisure facilities, GLL also manages a range of community based and outdoor sports facilities across 20 parks and open spaces including all-weather pitches, grass pitches, tennis and netball courts, MUGAs, skateparks, BMX track, athletics tracks and community rooms.

Case Study: Southwark Council – Everyone Active

- 9.2.23 Everyone Active, one of the largest leisure operators, currently manages bookings for seven parks and sports grounds on behalf of Southwark Council. The arrangement forms part of the wider leisure centres management contract which was publicly tendered in 2015. Facilities falling under Everyone Active's remit include all-weather pitches, grass pitches, meeting rooms, changing rooms, tennis courts and BMX track.

Advantages

- The Council has positive experience of securing successful and financially sustainable arrangements for similar services such as the leisure centres management contract.
- The operator partner will have strong expertise and experience of maximising income through highly developed sales and marketing strategies and will be able to minimise costs through economies of scale and low support costs. It is therefore likely to be more efficient than other options and provide a more financially beneficial solution for the Council.
- The Council will not be directly exposed to any commercial risk in terms of financial under-performance from lower than expected income levels or higher than expected expenditure.
- The Council may choose to pass full maintenance and lifecycle replacement risk to the operator partner. With the facilities in scope being new, the operator would be less inclined to build in additional risk provision to their financial model as they would be for an older facility where the future maintenance risk is more uncertain.

- The Council will benefit from a secure, fixed revenue position as a result of a contractually binding management fee with the operator partner. This will aid medium term financial planning.
- The operator partner may have access to capital or be able to lever in external funding for investment into facilities and/or programmes.
- The operator partner will have strong expertise and experience of delivering similar services and will be well placed to provide a high-quality service that is professionally marketed and meets the needs of users.
- The operator partner will be contractually obliged to deliver the services in accordance with the Council's strategic priorities, as set out within the core requirements of the contract specification.
- The operator partner will be contractually obliged to deliver, for the term of the contract, any targeted interventions which the Council has specified, regardless of the financial performance of the service.
- The Council will be able to measure the ongoing delivery of the services through a robust and contractually binding performance management framework which is aligned to its strategic priorities. This could be supported by a Strategic Partnership Board consisting of key senior figures from the operator and the Council.
- The Council will be able to focus upon the strategic direction of the service and its contribution to local strategic outcomes without the burden of commercial and operational responsibilities.

Disadvantages

- The Council would have less control over the delivery of the service than the in-house option and reduced flexibility to change it in response to changes in its own strategic priorities and/or local need.
- The Council would not directly benefit from any financial over-performance arising from higher than expected income levels or lower than expected expenditure, unless the contract includes an income / profit share arrangement.
- Outsourcing to an external operator may be perceived as 'privatisation' and could weaken the sense of 'community ownership' amongst local people, particularly those who are opposed to the commissioning of third parties to manage Council owned assets and services.
- The operator partner will usually seek to retain a profit payment.
- Given the strong presence of GLL as the Council's leisure centres operator partner, there may be limited interest from competing operators and a subsequent lack of competition in an open market tender.

Option 3 – Outsourcing to multiple external operators

- 9.2.24 The Council may choose to outsource the management of the site to more than one external operator by dividing up management responsibility across different facilities. The Council would retain ownership of the site and its assets but contract with (potentially) more than one operating partner through a public tendering process where the site is divided into 'lots'.
- 9.2.25 This may be seen as beneficial when considering the wide variety of facilities and services to be delivered across the site and the requirement for a range of different management skills. For example, high ropes is a relatively new and highly specialised activity which may be better

provided by a specialist operator who can bring additional technical expertise and commercial acumen to maximise the quality of service and optimise the market potential.

- 9.2.26 Consultation with two major leisure operators revealed that many of the facilities on site were 'core' services for them and they would be completely comfortable in managing them. These include the multi-use activity spaces, soft play, clip and climb, community rooms, nursery, artificial turf pitches, tennis courts and grass pitches. They are less familiar with the adventure golf and high ropes facilities although would be willing to take these on subject to a clearer understanding of the market potential of each.
- 9.2.27 The consultation also revealed that specialist grounds maintenance (pitches, play areas and pathways etc.) would likely be sub-contracted by the leisure operators to a third party and it may therefore be beneficial for this to remain the responsibility of the Council.
- 9.2.28 Hendon Football Club, located in the adjacent Silver Jubilee Park operate a 3-G artificial turf pitch which is used for club training and matches but also plays host to a highly successful community football programme part-funded through Wembley National Stadium Trust. A strong partnership with local schools and colleges and with the University Campus for Football Business at nearby Wembley Stadium has established the club as a leading local provider of community based programmes and initiatives.
- 9.2.29 Consultation with the club has revealed that they have a strong desire to be considered as a key partner in the future, either through direct management of the artificial turf pitches or as a key provider of community football programmes and user of the pitches.
- 9.2.30 With the potential for more than one operator on the site it would be essential for there to be an overall supporting governance structure which ensures that the interests of the different parties are properly represented and that they do not operate in isolation but work together in providing a coherent, joined up offer across the site.
- 9.2.31 As with Option 2, the services would be strategically driven by the Council but through separate service specifications with clearly defined required outputs and standards and robust performance management frameworks.
- 9.2.32 Also, as with Option 2, this approach to outsourcing would align with that adopted for the commissioning of the leisure centres service although the Council has the option to design the core requirements in a different way if it chooses to.

Case Study: Mile End Park, London Borough of Tower Hamlets

- 9.2.33 Spread over 32 hectares, Mile End Park is home to a diverse range of facilities and activities that are managed by different partners:
- The Ecology Park & the Ecology Pavilion – managed by the Council
 - The Arts Park and The Art Pavilion – managed by the Council
 - The Play Pavilion and Children’s Park – managed by the Council
 - Skate park, BMX and Urban adventure base - managed by the Council
 - Outdoor Gym – managed by the Council
 - Mile End Park Leisure Centre – managed by Greenwich Leisure Ltd.
 - Mile End stadium – managed by Greenwich Leisure Ltd.
 - Mile End Climbing Wall – managed by registered charity 'DEVELOPMENT through CHALLENGE'
 - Go Kart track – managed by Revolution Karting
 - Ragged School Museum – managed by The Ragged School Museum Trust.

9.2.34 The overall site is managed by the Council and the Head of Service reports to the Mile End Park Partnership board. The board consists of two senior councillors, the East London Business Alliance and trustees of what was the Environment Trust and the Friends of Mile End Park.

Case Study: Tilgate Park, Crawley

9.2.35 Tilgate Park is a large and popular recreational park partially set in the ancient Worth Forest and plays host to a variety of facilities and activities including:

- Nature Centre - managed by the Council
- Play area and outdoor gym – managed by the Council
- Family Restaurant – managed by commercial operator, Smith and Western
- High ropes and low ropes courses – managed by external operator, Go Ape
- Tilgate Lake – managed by external operator Tilgate Park Watersports
- Tilgate Golf Centre – managed by external operator, Glendale Golf
- Walled Garden Café – leased to commercial operator
- Craft Units – located next to the Nature Centre and Walled Garden Café are eight craft studios leased to a range of local artists, craftspeople and wellbeing practitioners.
- Fishing on the Tilgate and Silt Lakes is managed by two clubs, the Crawley Angling Society and the Tilgate Park Fisheries.

9.2.36 In addition to income generated through the various lease and management arrangements listed above, the Council is able to generate income from car parking to support the overall maintenance and management of the site.

Advantages

- The Council has positive experience of securing successful and financially sustainable arrangements for similar services such as the leisure centres management contract.
- The operator partners will have strong expertise and experience of maximising income through highly developed sales and marketing strategies and may be able to minimise costs through economies of scale and low support costs. It is therefore likely to be more efficient than other options and provide a more financially beneficial solution for the Council.
- The Council will not be directly exposed to any commercial risk in terms of financial under-performance from lower than expected income levels or higher than expected expenditure.
- The Council may choose to pass full maintenance and lifecycle replacement risk to the operator partners. With the facilities in scope being new, the operators would be less inclined to build in additional risk provision to their financial model as they would be for an older facility where the future maintenance risk is more uncertain.
- The Council will benefit from a secure, fixed revenue position as a result of a contractually binding management fee with the operator partners. This will aid medium term financial planning.
- The operator partners may have access to capital or be able to lever in external funding for investment into facilities and/or programmes.
- The operator partners will have strong expertise and experience of delivering similar services and will be well placed to provide a high-quality service that is professionally marketed and meets the needs of users.

- The operator partners will be contractually obliged to deliver the services in accordance with the Council’s strategic priorities, as set out within the core requirements of the contract specifications.
- The operator partners will be contractually obliged to deliver, for the term of the contract, any targeted interventions which the Council has specified, regardless of the financial performance of the service.
- The Council will be able to measure the ongoing delivery of the services through a robust and contractually binding performance management framework which is aligned to its strategic priorities.
- The Council will be able to focus upon the strategic direction of the service and its contribution to local strategic outcomes without the burden of commercial and operational responsibilities.

Disadvantages

- The Council will have to set up and manage multiple contracts and operator partners.
- The site may be more prone to operators working in isolation rather than in partnership and the overall offer may become fragmented as a result.
- The Council would have less control over the delivery of the service than the in-house option and reduced flexibility to change it in response to changes in its own strategic priorities and/or local need.
- The Council would not directly benefit from any financial over-performance arising from higher than expected income levels or lower than expected expenditure, unless the contract arrangements include an income / profit share arrangement.
- Outsourcing to external operators may be perceived as ‘privatisation’ and could weaken the sense of ‘community ownership’ amongst local people, particularly those who are opposed to the commissioning of third parties to manage Council owned assets and services.
- The operator partner will usually seek to retain a profit payment.
- Given the strong presence of GLL as the Council’s leisure centres operator partner, there may be limited interest from competing operators and a subsequent lack of competition in an open market tender.

Option 4 – Transfer of parks to a charitable trust

9.2.37 This option consists of establishing an independent charitable trust into which park assets are transferred into, normally under a long lease. The trust can be supported with an endowment from the local authority to guarantee core funding, usually through rental from assets, or the trust can rely solely on income generated from park activities and facilities. Such an arrangement can be set up for individual spaces or a collection of separate parks and green spaces.

9.2.38 The option could potentially provide a long-term management solution, protecting parks from further service cuts, and enabling a more strategic focus on improving quality. However, this option will be financially challenging if an endowment from the local authority cannot be secured or the parks do not have sufficient income streams to be financially self-sustainable.

Case Study: Newcastle City Council

9.2.39 In November 2017, Newcastle City Council agreed to set up an independent charitable trust to run the city’s parks and allotments, becoming the first major metropolitan authority in the UK to establish such a model.

- 9.2.40 It will start with a £9.5m council revenue contribution for its first 10 years. It must run all 12 principle parks, smaller green spaces and allotments.
- 9.2.41 Being a trust, it will be able to bid for grants and charitable funds that councils cannot. The Council will still own the land, but the trust will legally protect them. The Council received £237,500 from the Heritage Lottery Fund to support the development of a trust model.

Case Study: Milton Keynes Park Trust

- 9.2.42 The Parks Trust, formerly known as Milton Keynes Parks Trust, was established in 1991 by the Milton Keynes Development Corporation to own and manage, on a 999 year lease, parks and open spaces across Milton Keynes. At the same time, an endowment of around £20m was provided to the Trust, mainly in the form of commercial property and the rental income is used to fund the ongoing management and maintenance costs.
- 9.2.43 The Trust is entirely self-financing with the income from this portfolio funding the management and enhancement of the landscape and a number of other services including events, an education programme for local schools, all supported by a volunteer cohort of over 160 residents.

Case Study: Potters Fields Park Southwark, London

- 9.2.44 Potters Fields Park is managed by the Potters Fields Park Management Trust, a not-for-profit organisation managed by a board of directors, made up of representatives from local organisations.
- 9.2.45 The Trust’s primary objective is to manage and maintain the park on a self-financing basis as an open space and garden for the public to enjoy. It leases the park for events, functions and other activities in order to provide funds for maintenance, and to develop programmes which educate and engage with the community.

Advantages

- The model aligns broadly with the Council’s wider commissioning approach.
- The Council will not be directly exposed to any commercial risk in terms of financial under-performance from lower than expected income levels or higher than expected expenditure.
- The Council will be able to pass full risk of maintenance and lifecycle replacement to the Trust and remove itself from ongoing day to day management of the site.
- The model is likely to be more successful than other options in attracting external funding and sponsorship.
- The Trust is relatively flexible in decision-making, independent from political intervention and not subject to potential changes in strategic direction as a result of the political cycle.

Disadvantages

- The Trust will not have the expertise or experience of managing similar services and may not be able to maximise income. The Trust also is unlikely to be able to provide the same economies of scale or low support costs as other options. This is likely to result in a less advantageous financial return on the Council’s capital investment.
- The lack of expertise or experience may lead to a lower quality of service than other options which include more specialist management.
- The Council may need to identify/create an endowment fund to support the Trust model.

- The set-up costs are high and the TUPE and legal process is likely to take considerable time to negotiate.
- Funding through an endowment will need to be carefully managed.

Option 5 - Community Sports Association (CSA)

- 9.2.46 There is an opportunity to develop a new Community Sports Association (CSA) to manage the Community Sports Hub and wider site, comprising of some or all of the clubs that use the site. Under a CSA, the clubs would retain their identity and autonomy in relation to individual club matters but come together under the umbrella of the CSA to ensure effective management of the facilities.
- 9.2.47 CSAs can be structured in different ways but generally consist of a management board of representatives from the different clubs and other potential stakeholders, often including some representation from the local authority. CSAs are governed by a Constitution or Terms of Reference jointly agreed and entered into by the member clubs.
- 9.2.48 The development of CSAs is part of a national drive, supported by Sport England, to promote community-owned and led multi-sport hubs. By pooling resources of member clubs, many CSAs have been able to build capacity across the wider organisation and lever in external funding to support facility developments or sports development programmes.
- 9.2.49 This joined-up approach can secure year-round use of the built facilities and promote cross-fertilisation between member clubs, particularly between winter and summer sports, thereby helping to support player numbers (something that sports clubs are traditionally struggling with).
- 9.2.50 This option utilises local knowledge and engagement from sports clubs but could be perceived as off-loading the risks to the community who may not have capacity to deliver. The costs of the management of the park could be a heavy burden on the CSA's sustainability and the Council would ultimately be responsible for 'underwriting' the risk of failure of this model.

Case Study: Holford Drive Community Sports Hub

- 9.2.51 The Holford Drive Community Sports Hub in Perry Barr, Birmingham is a major state-of-the-art leisure centre run by the four core sports clubs; Aston Boxing Club, Holford Drive Tennis Club, Continental Star Football Club and Continental Cricket Club.
- 9.2.52 National Lottery funding paid for the restoration of derelict inner-city playing fields to create brand-new facilities, including a new boxing gym, changing rooms, floodlit tennis courts, cricket nets, 5 pitch cricket square and football pitches. The site also has a social meeting room and studio.
- 9.2.53 The Board is made up of two trustees appointed by each of the four founder clubs, along with a Councillor nominated by Birmingham City Council, and Broadway Academy, the local secondary school. There are two "skills based" appointees and a trustee who plays the role of community advocate.
- 9.2.54 The Board meets monthly to manage the business. The four founding clubs retain their own constitutions, committees, rules, regulations and accounts.

Case Study: Finsbury Park Sports Partnership, London

- 9.2.55 Finsbury Park Sports Partnership (FPSP) manage and operate a sports centre based in Finsbury Park, North London. FPSP were founded in 2012 to keep the facilities operating in Finsbury Park, as they were threatened by closure due to budget cuts.

- 9.2.56 The centre consists of a fitness suite, exercise studio, meeting room, athletics track, sports field, 7 full size tennis courts, and 2 mini tennis courts.
- 9.2.57 The founding members of the FPSP are Access to Sport, Dynamic Sports Academy, London Blitz American Football Club and London Heathside Athletics Club. They are a volunteer organisation which aims to not only maintain current access to the facility for existing users, but to attract funding to improve the facility and increase usage.

Case Study: Lordship Hub, Haringey

- 9.2.58 Lordship Hub, located in the centre of Lordship Recreation Ground is home to a community café, toilets and rooms available to hire.
- 9.2.59 It is managed by Lordship Rec Eco Hub Co-operative Ltd and run on a day to day basis by a dedicated team of volunteers, supported by a small staff group.
- 9.2.60 The Hub is a base for all the park user groups and supports their work, being used on a daily basis to run fitness classes like Yoga and Capoeira or for art sessions and training.

Advantages

- The model supports a ‘sports focused’ approach and may be perceived as being more ‘community-focused’ than other options.
- Depending on the arrangement, the Council may be able to pass the risk of operating income and expenditure to the CSA.
- The Council will not be responsible for the day to day management of the site.

Disadvantages

- The CSA will not have the expertise or experience of managing similar services and may not be able to maximise income. The CSA will also not be able to provide the same economies of scale or low support costs as other options. This is likely to result in a less advantageous financial return on the Council’s capital investment.
- The transfer of such a significant set of assets is unlikely to be politically palatable following such investment in the site by the Council.
- The lack of expertise or experience may lead to a lower quality of service than other options which include more specialist management.
- The Council would be exposed to the ongoing risk of financial under-performance and possible failure of the CSA to achieve a long-term financially sustainable operation.
- The Council would be exposed to the risk of the CSA breaking down or individual clubs folding, possibly leading to the site being handed back to the Council.
- The CSA would be unlikely to be able to provide capital investment into the site and may not be able to meet the cost of lifecycle replacement of assets.
- There is a risk of disagreement between founder clubs due to competing interests which may impact upon the quality of facilities and services available to local people.
- Apart from Hendon Bowls Club and possibly Hendon Football Club (who are not currently a user of the site), there are limited established clubs on site that could form a CSA.

9.3 Evaluation of identified management models for WHPF

- 9.3.1 SLC has undertaken an initial evaluation of each of the management models described above using a set of financial and non-financial criteria agreed with the Council.

9.3.2 The weighting of evaluation criteria was agreed at 60% Financial and 40% Non-Financial in recognition of the Council’s core requirement that the site is financially sustainable over the medium to long-term in order to protect and optimise its investment.

9.3.3 The financial and non-financial criteria and weightings are provided in Table 11.

Table 11: Evaluation Criteria and Weightings

Financial Criteria (60%)	% Weighting	Pro-rata maximum % points
The degree to which the option is likely to deliver the Council's requirement of zero subsidy (minimum)	40%	24
The degree to which the option is likely to maximise future income opportunities through innovation and further investment	20%	12
The degree to which the option delivers a secure revenue position for the Council (Medium term financial planning / degree of financial certainty)	20%	12
The degree to which the option minimises commercial risk to the Council (ongoing income and expenditure)	10%	6
The degree to which the option minimises asset risk to the Council (maintenance responsibility and lifecycle costs)	10%	6
Total	100%	60
Non-financial Criteria (40%)	% Weighting	Pro-rata maximum % points
The degree to which the option contributes to the strategic objectives of the Council i.e. increased participation in sport and physical activity, greater engagement with parks and open spaces etc.	40%	16
The degree to which the option provides a high-quality service through the effective management of facilities, services and assets	40%	16
The degree to which the Council has control over service quality and performance management	10%	4
The degree to which the option minimises the requirement for additional capacity and resource from the Council	10%	4
Total	100%	40

9.3.4 Figure 18 provides a summary of SLC’s initial evaluation of the identified management models.

Figure 18: Summary of Management Model Evaluation

FINANCIAL CRITERIA		Weighting	Max % Points	In-House		Single External Operator		Multiple External Operators		Charitable Trust		Community Sports Association (CSA)	
				Raw Score (out of 100)	Weighted Score	Raw Score (out of 100)	Weighted Score	Raw Score (max 100)	Weighted Score	Raw Score (out of 100)	Weighted Score	Raw Score (out of 100)	Weighted Score
1	The degree to which the option is likely to deliver the Council's requirement of zero subsidy (minimum)	40%	24	30	7.2	75	18	75	18	40	9.6	20	4.8
2	The degree to which the option is likely to maximise future income opportunities through innovation and further investment	20%	12	40	4.8	75	9	75	9	40	4.8	20	2.4
3	The degree to which the option delivers a secure revenue position for the Council (Medium term financial planning / degree of financial certainty)	20%	12	25	3	90	10.8	80	9.6	60	7.2	40	4.8
4	The degree to which the option minimises commercial risk to the Council (ongoing income and expenditure)	10%	6	0	0	90	5.4	80	4.8	60	3.6	30	1.8
5	The degree to which the option minimises asset risk to the Council (maintenance responsibility and lifecycle costs)	10%	6	0	0	80	4.8	80	4.8	60	3.6	40	2.4
TOTAL FINANCIAL		100%	60	95	15	410	48	390	46.2	260	28.8	150	16.2
NON FINANCIAL CRITERIA													
1	The degree to which the option contributes to the strategic objectives of the Council i.e. increased participation in sport and physical activity, greater engagement with parks and open spaces etc.	40%	16	70	11.2	80	12.8	80	12.8	50	8	25	4
2	The degree to which the option provides a high quality service through the effective management of facilities, services and assets	40%	16	50	8	80	12.8	90	14.4	50	8	40	6.4
3	The degree to which the Council has control over service quality and performance management	10%	4	90	3.6	80	3.2	70	2.8	60	2.4	25	1
4	The degree to which the option minimises the requirement for additional capacity and resource from the Council	10%	4	0	0	75	3	70	2.8	70	2.8	70	2.8
TOTAL NON FINANCIAL		100%	40	210	22.8	315	31.8	310	32.8	230	21.2	160	14.2
TOTAL SCORE					37.8		79.8		79		50		30.4



9.3.5 SLC's evaluation of the identified management models is supported by the rationale described in Table 12.

Table 12: Scoring Rationale

Financial Criteria (60%)	Summary Rationale
The degree to which the option is likely to deliver the Council's requirement of zero subsidy (minimum).	The options to contract with external operators (either single or multiple) are likely to provide the strongest financial return due to their expertise, experience and commercial acumen in managing similar services. The in-house, charitable trust and CSA options will not benefit from the economies of scale and from established, proven marketing and sales strategies enjoyed by multi-site operators.
The degree to which the option is likely to maximise future income opportunities through innovation and further investment.	External operators are well used to operating in a competitive commercial environment and are likely to be most responsive to changing markets and optimising income streams through innovative programming and investment.
The degree to which the option delivers a secure revenue position for the Council (Medium-term financial planning / degree of financial certainty).	A contract with an external operator will secure a fixed management fee for the term of the contract (typically 10 years) and provide the Council with a high degree of certainty to aid medium term financial planning. In comparison, the in-house model would expose the Council to year on year fluctuations in financial performance. The CSA and Charitable Trust would provide a more secure position as the Council is not directly responsible for income and expenditure. However, the Council would likely be called upon to help support both models in the event they were underperforming or to step in if the model broke down completely. The Council would therefore effectively 'underwrite' the financial risk.
The degree to which the option minimises commercial risk to the Council (ongoing income and expenditure).	As above, an external operator will take full commercial risk and therefore scores highest. They will ordinarily benefit from a robust financial model across their wider portfolio of contracts which means they can manage any financial under-performance more easily and without impacting upon the contractually agreed management fee. The Council, on the other hand, takes full risk on the in-house model and would be directly exposed to commercial risk including changes in the market. Also, as above, whilst the Council would likely pass all commercial risk to the CSA or Charitable Trust, it would be more exposed, indirectly, to financial under performance of these models.
The degree to which the option minimises asset risk to the	This would depend on the Council's approach to risk share under the terms of any commissioned or

Financial Criteria (60%)	Summary Rationale
<p>Council (maintenance responsibility and lifecycle costs).</p>	<p>outsourced arrangement. However, for the purposes of this evaluation, it is assumed that it would be a full repair, maintain and lifecycle replacement arrangement.</p> <p>External operators score well on the basis that they have experience of taking full risk on maintenance and can draw upon established asset management systems and existing head office and regional support and expertise. Charitable Trusts and CSAs would need to establish these systems and support and their capacity to maintain these assets is arguably more likely to be impacted by any financial under-performance.</p>
Non-financial Criteria (40%)	Summary Rationale
<p>The degree to which the option contributes to the strategic objectives of the Council i.e. increased participation in sport and physical activity, greater engagement with parks and open spaces etc.</p>	<p>The in-house and external operator models all score well. The in-house model will have full control over delivery and be able to adapt according to the strategic priorities of the Council. The external operator models will be directed by a comprehensive services specification founded upon the Council's strategic priorities and required outcomes and governed by a contract and performance management framework. The external model scores slightly better on the basis that the requirements will be contractually binding for the full term of the contract and so the contribution to the Council's strategic priorities will be consistent and should not be affected by any financial under-performance. By comparison, because the Council is exposed to full commercial risk under the in-house model, interventions that are more costly but strategically more important, are prone to being reduced as a result of any financial under-performance.</p> <p>The arrangements for both the Charitable Trust and CSA models can be founded upon a set of strategic priorities agreed with the Council. However, the arrangements will likely be over a longer term and less rigid in terms of the specified requirements of a management contract and so do not score as highly. Arrangements for the CSA would likely be more 'hands off' under the terms of an asset transfer and so this option scores lowest.</p>
<p>The degree to which the option provides a high-quality service through the effective</p>	<p>Given the experience and expertise of external operators gained through the operation of similar services, they score highest under this criterion. They will be able to implement highly developed and</p>

Financial Criteria (60%)	Summary Rationale
management of facilities, services and assets	thoroughly tested operating systems to ensure high levels of customer service and asset management. The comparative lack of experience and expertise of the Council, Charitable Trust and CSA means that they score lower.
The degree to which the Council has control over service quality and performance management	The in-house option scores highest here as the Council will retain full control over the service. The external operator options also score well on the basis that control will be applied through a robust services specification and performance management framework. The difference between the single and multiple operators option is due to the fact that exercising control over multiple operators is likely to be more challenging than a single operator.
The degree to which the option minimises the requirement for additional capacity and resource from the Council	The in-house option understandably scores lowest as there will be a requirement for significant additional capacity and resource to set up the required operating systems and central support services and to provide ongoing day to day management support. The remaining options all score well including the Charitable Trust and CSA models. Whilst there would be a requirement for initial support in setting up the arrangements, the transfer of assets would help minimise any ongoing additional support required from the Council.

9.3.6 The management options evaluation exercise has revealed that the optimal model is to outsource the management to a single external operator. This model scores marginally better than the multiple external operators on the financial criteria due it providing a slightly more robust model. By contracting with multiple operators, there is marginally more risk of one (or more) of these, failing to meet their financial projections.

9.3.7 In terms of the non-financial criteria, the multiple external operator option scores marginally higher. This is due to the fact that the quality of service and product of certain facilities (e.g. high ropes and adventure golf) may be slightly higher as they are being managed by an operator who specialises in that particular field.

9.3.8 The difference between the two is negligible (0.8%) and so the Council should explore both of these preferred models further at the appropriate stage.

9.4 Summary

9.4.1 In considering options for the future management of facilities at WHPF, the Council will need to ensure a strong and sustainable revenue position and the delivery of high-quality facilities and services.

9.4.2 SLC has identified a number of different potential management models for consideration by the Council and highlighted some of the advantages and disadvantages of each. This is not an exhaustive list and given the unique nature of the proposed development, there may be

benefit in exploring models which combine different elements of each, taking account of the Council's preferred approach to risk transfer.

- 9.4.3 Based on the criteria agreed with the Council, the evaluation of management model options has revealed that commissioning an external leisure operator (or operators) to manage the site would be the optimal approach. This would likely be on the basis of a management contract, supported by a detailed services specification which links directly to the Council's strategic priorities and contributes strongly to its strategic outcomes.

10 CONCLUSIONS AND RECOMMENDATIONS

10.1 Introduction

10.1.1 The masterplanning project for WHPF has identified a series of proposed facility developments which will achieve the Council’s aspiration of establishing it as one of three sports hub sites alongside Cophall and Barnet and King George V Playing Fields.

10.1.2 This section provides a summary of the key conclusions from the masterplanning exercise, recommendations to the Council and the required next steps.

10.2 Conclusions

10.2.1 A summary of the conclusions of the Phase 2: Masterplanning for WHPF is provided below.

- a. An optimal mix of facility developments, consistent with the Council’s brief of establishing WHPF as a strategic sports hub with a wider leisure and community offer, has been identified through Phase 1: Options Appraisal.
- b. A RIBA Stage 2 initial draft masterplan and accompanying building layout drawings has subsequently been developed for the identified facility mix including:
 - A new Community Sports Hub to include the following facilities:
 - Café
 - Clip and Climb facility
 - Soft play
 - 2 x multi-activity studios
 - 2 x community rooms
 - Children’s nursery
 - Facilities for Hendon Bowling Club
 - Changing rooms and toilets.
 - Improved and reconfigured grass football pitches
 - 2 x 3G Artificial Turf Pitches (floodlit)
 - Multi-Use Games Area (floodlit)
 - Replacement Tennis Courts
 - Wheeled Sports Facility – Skatepark, BMX
 - Bowling Green
 - Adventurous and Toddler Play Areas
 - Outdoor Gym and Trim Trail
 - Improved pedestrian and cycle routes
 - Adventure Golf Course
 - High Ropes Course
 - Woodland Nature Trails
 - Community / Sensory Garden
 - Picnic Areas.

- c. Feedback from engagement with current users and occupiers, wider stakeholders and the general public on the initial draft masterplan showed strong overall support for the scheme with 86% of respondents to the online survey being supportive or very supportive of the initial draft masterplan.
- d. Concerns raised by local conservationists relating to the impact of development upon the SSSI designation and Local Nature Reserve were considered by SLC and the Council and subsequent amendments have been made to the draft masterplan in light of these concerns.
- e. The indicative programme of use developed by SLC to inform the parking requirements for the current and proposed additional facilities has identified a requirement for 274 spaces during peak times. The 236 spaces provided in the draft masterplan are therefore not sufficient to meet the maximum number of cars projected through the programme of use. It will therefore be essential that the Council explores opportunities for developing a network of more sustainable transport routes to the site through improved cycle and pedestrian routes and connections from the surrounding areas and through improved public transport links.
- f. The construction costs of all developments within the draft masterplan are estimated to be c. £12.1M. The contingency, professional fees and fit out costs are estimated to be c. £2.5M and the cost of inflation based upon a mid-point of construction of Q4 2022 is estimated to be c. £3.1M. **The total overall development cost of delivering the masterplan is £17.7M.**
- g. High-level business plans have been developed to support the business case for investment. **Over a 10-year period, it is projected that an average annual revenue surplus of £405,000 would be generated by the facilities included in the draft masterplan for the site.**
- h. There are a number of potential grant funding sources available to the Council and other stakeholders. Each of these will have specific criteria to meet and are worthy of further exploration as the masterplan develops through more detailed design stages. However, it is not possible at this stage to assess the Council's likely chances of success.
- i. SLC identified a number of different potential management models for consideration by the Council and highlighted some of the advantages and disadvantages of each.
- j. Based on the criteria agreed with the Council, the evaluation of management model options has revealed that commissioning an external leisure operator (or operators) to manage the site would be the optimal approach.

10.3 Recommendations

10.3.1 The recommendations arising from the masterplan and feasibility study are as follows:

- a. The Council should note the findings of the masterplan and feasibility study and consider taking the scheme forward to the next stage of consultation.
- b. The Council should formally engage with Natural England and other statutory planning consultees e.g. Canal and River Trust, Environment Agency, during the next stage of consultation, to fully understand the potential constraints of development linked to the Welsh Harp, SSSI and Local Nature Reserve.
- c. The Council should develop an outline funding strategy to explore options for delivery of the proposed masterplan.

- d. The Council should work with partners to explore opportunities for developing a network of more sustainable transport routes to the site through improved cycle and pedestrian routes and connections from the surrounding areas and through improved public transport links.

APPENDICES

11 APPENDIX 1: WEST HENDON PLAYING FIELDS OPTIONS APPRAISAL REPORT


11.1.1 Provided as separate document.

12 APPENDIX 2: MASTERPLAN DRAWINGS

12.1.1 A full set of all masterplan drawings are provided in a separate pack to include the following:

- Initial Draft Masterplan – Detailed
- Initial Draft Masterplan – Simplified
- Final Draft Masterplan – Detailed
- Final Draft Masterplan - Simplified
- Community Sports Hub plan
- Detailed Area Drawings
- Wider Context Plan
- Adjacent Land Uses and Green Infrastructure
- Character Areas
- SWOT Analysis.


13 APPENDIX 3: ACCOMMODATION SCHEDULE


West Hendon playing fields Accommodation schedule		
		
Project Number	0118	
Client	London Borough of Barnet	
Date/Revision	25-07-2018	
Area Description	Brief sq m	Comments
Community Hub		
Unisex toilet	5	Accessible within building. Managed by café operator
Unisex toilet	5	Accessible within building. Managed by café operator
Changing rooms	264	say 8 no. @ 33 sqm includes toilets and showers
Referee changing room	10	
Assisted changing accommodation	12	Doubles up as female referee changing room
Bowls club changing rooms (2 no.)	60	2 no. @ 30 sqm includes showers and lockers subject to inspection of existing provision
Bowls male toilets	15	
Bowls female toilets	15	
Bowls assisted changing accommodation	12	
Bar	15	Bar can be subdivided to provide exclusive use for bowls club
Bar store	10	
Bowls function room	100	To be confirmed subject to inspection of existing provision
Café	100	50-60 covers internally
Kitchen	25	Servery to connect to bowls club bar
Kitchen store	10	
Male toilets	20	Shared by all facilities
Female toilets	20	Shared by all facilities
Disabled persons toilet	5	Shared by all facilities
Multi activity studios (2 no.)	360	2 no. @ 180 sq m. 25 person capacity linked with acoustic partition
Storage	36	
Community rooms (2 no.)	60	2 no. @ 30 sqm. Each suitable for 20 persons.
Storage	6	
Nursery main area	116	area as per existing provision
Nursery secondary area	48	area as per existing provision
Nursery soft play area	22	area as per existing provision
Nursery kitchen	12	area as per existing provision
Nursery office	12	area as per existing provision
Nursery staff amenity	6	area as per existing provision
2 no. disabled toilets	10	area as per existing provision
6 no. wcs	9	area as per existing provision
Clip 'n Climb	75	10-12 challenges
Clip 'n Climb storage	8	
Soft Play	60	Double storey height
Office	40	5 persons
Sub Total	1583	
Circulation/internal walls	198	
Plant	237	
Sub Total	2018	
Cycle storage/hire area	20	
External storage	15	
Total GIFA	2053	

14 APPENDIX 4: PROGRAMME OF USE


14.1.1 Provided as separate document.

15 APPENDIX 5: BUDGET ESTIMATE


					
West Hendon Playing Fields					
Budget Estimate - W HENDON			Rev 2		Dec-18
			Estimate		
Cost Summary			Unit	Rate £	Total £
1.00	<u>West Hendon</u>				
1.01	Community Hub		2,018	2,296	4,634,000
1.02	Temporary Bowls Changing facility		Item	30,000	30,000
1.03	Temporary Nursery / Martial Arts studio		Item	25,000	25,000
1.04	Adult toilet block for last		Item	10,000	10,000
1.05	Cycle storage / hire area		20	900	18,000
1.06	External Storage		15	600	9,000
1.07	External Works and Landscaping				3,126,000
1.08	External Sports and Activity				4,230,000
	Total				12,082,000
2.00	<u>Contingency</u>				
2.01	Contingency allowance	Allowance 10%	Item	1,208,000	1,208,000
	TOTAL COST				13,290,000
3.00	<u>Fees , Land Costs and FF & E</u>				
3.01	Planning and B Regs		Item	50,000	50,000
3.02	Surveys		Item	100,000	100,000
3.03	Professional fees	Allowance 8.5%	Item	1,130,000	1,130,000
3.04	Furniture, Fittings and Equipment		Item	57,000	57,000
	Sub Total				14,630,000
4.00	Inflation to Construction mid-point	4Q 22	Item	3,070,000	3,070,000
	TOTAL DEVELOPMENT COST				17,700,000

					
West Hendon Playing Fields					
Community Sports Hub					
Budget Estimate			Rev 2	Dec-18	
			Estimate		
Cost Summary					Total
			m²	£m²	£
Facility					
1.01	<u>Public Toilets</u>		10		
	Accessible unisex toilet		5	2,650	13,300
	Accessible unisex toilet		5	2,650	13,300
1.02	<u>Changing</u>		286		
	Changing rooms	8 Nr	264	1,900	501,600
	Referee changing	1 Nr	10	2,050	20,500
	Assisted changing		12	2,150	25,800
1.03	<u>Bowls Club Changing</u>		102		
	Changing rooms	2 Nr	60	1,900	114,000
	Male toilets		15	2,250	33,800
	Female toilets		15	2,250	33,800
	Assisted changing		12	2,150	25,800
1.04	<u>Bar / Catering etc</u>		260		
	Bar		15	2,800	42,000
	Bar store		10	1,850	18,500
	Bowls function room		100	1,950	195,000
	Café	50-60 covers	100	2,150	215,000
	Kitchen		25	3,450	86,300
	Kitchen store		10	3,200	32,000
1.05	<u>Shared Toilets</u>		45		
	Male toilets		20	2,250	45,000
	Female toilets		20	2,250	45,000
	Accessible WC		5	2,650	13,300

1.06	<u>Studios</u>		396		
	Multi activity studio 1	Moveable ptn	180	1,950	351,000
	Multi activity studio 2		180	1,850	333,000
	Storage		36	1,400	50,000
1.07	<u>Community Facilities</u>		66		
	Community Room 1	20 Person	30	1,850	55,500
	Community Room 2	20 Person	30	1,550	46,500
	Storage		6	1,400	8,400
1.08	<u>Nursery</u>		235		
	Main area		116	2,150	249,400
	Secondary area		48	2,100	100,800
	Soft play area		22	2,100	46,200
	Kitchen		12	2,850	34,200
	Office		12	1,550	18,600
	Staff amenity		6	1,700	10,200
	Accessible toilets	2 Nr	10	2,650	26,500
	Toilets	6 Nr	9	2,250	20,300
1.09	<u>Clip'n Climb</u>		83		
	Clip 'n climb	10-12 challenges	75	1,450	108,800
	Equipment		Item	180,000	180,000
	Storage		8	1,400	11,200
1.10	<u>Soft Play</u>		60		
	Soft play	Double height	60	1,450	87,000
	Equipment		Item	50,000	50,000
1.11	<u>Administration</u>		40		
	Office	5 Person	40	1,600	64,000
1.12	<u>Sundry Areas</u>		435		
	Circulation / internal walls		198	1,900	376,200
	Plant		237	2,400	568,800
1.13	<u>Abnormal Costs</u>				
	Piled foundations		2,018	180	363,200
	TOTAL COMMUNITY HUB BUILDING COST		2,018	2,296	4,634,000

						
West Hendon Playing Fields						
External Works and Landscaping Proposals						
Budget Estimate			Rev 2		Dec-18	
			Estimate			
Cost Summary						Total
			Quant	Unit	Rate £	£
1.01	<u>Car Parking</u>					
	Car parking to Hub	62 addtl spaces	62	Nr	2,175	135,000
	Resurface existing car park and access		3,650	m2	38	139,000
	Lighting to car park		Item		25,000	25,000
	Car parking to BMX		91	Nr	2,175	198,000
	Resurface existing car park		1,080	m2	38	41,000
	Lighting to car park		1item		40,000	40,000
1.02	<u>General Paving etc</u>					
	General paving to hub etc		450	m2	70	31,500
	External café area		100	m2	240	24,000
	Tables and chairs		Item		5,000	5,000
	Landscaping		Item		25,000	25,000
	Footpaths	2 m wide	2,000	m	120	240,000
	Cycle tracks / footpaths	3 m wide	2,500	m	180	450,000
	Extra for staked and planked sections		600	m	200	120,000
	CCTV to pedestrian and cycle ways		Item		250,000	250,000
	Cycle rack and store		2	Nr	16,000	32,000

1.03	Site Works					
	Demolish existing building		Item		75,000	75,000
	Asbestos removal		Item		20,000	20,000
	Site clearance etc		Item		70,000	70,000
	Topsoil spreading		Item		35,000	35,000
	Drainage to buildings		1,996	m2	38	75,800
	Drainage to temporary buildings		Item		15,000	15,000
	Drainage to car parks etc		Item		110,000	110,000
	Suds area and attenuation; link bridge		Item		120,000	120,000
	Site services - reuse existing		Item		40,000	40,000
	Lighting		Item		105,000	105,000
	Temporary services		Item		20,000	20,000
	Street furniture		Item		90,000	90,000
	Informal picnic area ; benches etc		Item		5,000	5,000
	Boundary fencing to car parks etc		Item		5,000	5,000
	Alterations to the Silk Stream Bridge		Item		300,000	300,000
	Interpretation and signage		Item		85,000	85,000
	Community garden		Item		55,000	55,000
	Entrance and gates to bowls		Item		5,000	5,000
	Soft landscaping		Item		140,000	140,000
	TOTAL EXTERNAL WORKS COST					3,126,000

						
West Hendon Playing Fields						
External Sports and Activity						
Budget Estimate			Rev 2		Dec-18	
			Estimate			
Cost Summary						Total
			Quant	Unit	Rate £	£
1.01	<u>External Sports</u>					
	Grass football pitches ; grading; drainage	9 Pitches	Item		200,000	200,000
	Adult size 3G pitch; fenced; lighting		2	Nr	900,000	1,800,000
	MUGA; fence; lighting	36.6 x 21.35m	Item		145,000	145,000
	Tennis court	2 Court	2	Nr	75,000	150,000
	Landscaping		Item		10,000	10,000
	BMX / Skatepark		Item		580,000	580,000
1.02	<u>External Activity</u>					
	Adventure play area		Item		100,000	100,000
	Equipment and installation		Item		360,000	360,000
	Todler play area		Item		20,000	20,000
	Equipment and installation		Item		50,000	50,000
	Adventure golf		Item		250,000	250,000
	Café kiosk; CCTV		Item		30,000	30,000
	Fencing		Item		15,000	15,000
	High ropes area		Item		310,000	310,000
	Toilets; storage; kiosk		Item		50,000	50,000
	CCTV		Item		10,000	10,000
	Outdoor gym		Item		15,000	15,000
	Equipment and installation		Item		100,000	100,000
	Trim trail route	2k	Item		20,000	20,000
	Trim trail equipment; installation	10 Stations	10	Nr	1,500	15,000
TOTAL EXTERNAL SPORTS COST						4,230,000

Furniture, Fittings and Equipment Schedule					
INITIAL ASSESSMENT (Combined)			11/12/18		
ITEM	£	ITEM	£		
General		Pools			
1	Fire Fighting Equipment	5000	37	Pool Access Ladders and Handrails	0
2	Pay Telephone	Excl	38	Pool Hoist for Disabled	0
3	First Aid Boxes	1000	39	Pool covers	0
4	Soap Dispensers (T.R. Holders etc)	1800	40	Pool Cleaning Equipment	0
5	CCTV, Intruder Alarm; Induction Loop	Contract	41	Starting Blocks	0
6	Barrier and Card System	Excl	42	Backstroke Warning Sets	0
7	Computer System - Microcashe	Contract	43	Pace / Time Clocks	0
8	Telephone System	15000	44	Pool Temperature Display (2 Nr)	0
9	Safe	5000	45	Poolside Wheelchair	0
10	Music System	Excl	46	Lane Ropes	0
11	Audio/Visual Link to Televisions	Excl	47	Storage Reel	0
12	Equipment Trolleys	Excl	48	Turning Boards	0
13	Waste Bins	500	49	False Start Set	0
14	Cash Tills	2500	50	Reaching Poles	0
15	Filing Cabinets	1000	51	Water Testing Kits	0
16	Sanitary Tower Bins	500	52	Floats	0
17	Clocks	500	53	Water sports equipment	0
18	TV Monitors	2000	54	Lifeguard Chairs	0
19	TV Monitor Support System	500	55	Costume Dryer	0
20	Loose Seating	300	Children		
21	Hand Dryers	Contract	56	Soft Play Equipment	Contract
22	Hair Dryers	300	57	Nappy Disposal Bin	300
23	Drinking Water Dispensers	Contract	58	Creche / Nursery Equipment	8,000
24	Carpets	Contract	59	Childrens Pens & Change Units	2,000
25	Curtains / blinds	4000	Fitness		
Kitchen / catering			60	Fitness Reception Desk	0
26	Kitchen Units	18000	61	Fitness Equipment - 50/50 split	0
27	Kitchen Appliances	4000	62	Minor fitness equipment	0
28	Vending Machines	Excl	63	Drawer Units	Excl
29	Tables and Chairs	5000	64	Lifesaving Equipment	Excl
Safety / First aid			65	Step Aerobics	500
30	Defibrillator	3000	66	Body pump equipment	Excl
31	Safety Equipment and Radios	1000	67	Mats	700
32	Examination Couch	Excl	68	Baskets	Excl
33	Spinal Injury Board	Excl	69	Mirrors to Activity Room / Fitness	Contract
Staff			Externally		
34	Staff Room Equipment	2000	70	Car Park Barrier	Excl
35	Office Equipment	1500	71	Car Park Ticket Machines	Excl
36	Office Furniture	2500		Sub-total	11,500
	Sub-total	76900		SPLIT - 60% - W Hendon	76,900
				- 40% - Barnet	88,400
			72	Contingencies	6,600
SUGGESTED BUDGET ALLOWANCE				£	95,000

Budget Estimate	Rev 2	Dec-18
<u>Assumptions</u>		
Costs are based at current cost - 4Q 2018		
Inflation has been allowed to the projected construction mid point - 4Q 2022		
No unexploded ordnance exists on site		
No contamination exists on site		
Re-use site services at West hendon playing fields		
Soil conditions permit traditional foundation design		
No flood measures required for the buildings		
No works to existing Bowls Green at W hendon		
Temporary facilities at W Hendon will use their existing equipment		
<u>Exclusions</u>		
VAT		
Legal costs and fees		
Client internal costs		
Loss of earnings through closure / disruption		
Allowance for UXO		

16 APPENDIX 6: BUSINESS PLAN SUMMARY

West Hendon Playing Fields
10 Year Income and Expenditure Summary
Annual inflation rate **2%**

	1	2	3	4	5	6	7	8	9	10	Total
INCOME											
Grass Football Pitches Income	£11,904	£14,744	£17,693	£18,047	£18,408	£18,776	£19,152	£19,535	£19,925	£20,324	£178,507
ATPs Income	£151,869	£188,101	£225,721	£230,236	£234,840	£239,537	£244,328	£249,215	£254,199	£259,283	£2,277,329
Tennis Courts Income	£3,150	£3,902	£4,682	£4,775	£4,871	£4,968	£5,068	£5,169	£5,272	£5,378	£47,235
Café Concession Income	£25,000	£25,500	£26,010	£26,530	£27,061	£27,602	£28,154	£28,717	£29,291	£29,877	£273,743
Nursery Rent Income	£37,000	£37,740	£38,495	£39,265	£40,050	£40,851	£41,668	£42,501	£43,351	£44,218	£405,140
Community Rooms Income	£27,405	£33,943	£40,732	£41,546	£42,377	£43,225	£44,089	£44,971	£45,870	£46,788	£410,947
Multi-Use Activity Space Income	£98,700	£122,247	£146,696	£149,630	£152,623	£155,675	£158,789	£161,965	£165,204	£168,508	£1,480,038
Clip n Climb Income	£161,700	£200,277	£240,332	£245,139	£250,042	£255,043	£260,144	£265,346	£270,653	£276,066	£2,424,743
Soft Play Income	£59,500	£73,695	£88,434	£90,203	£92,007	£93,847	£95,724	£97,638	£99,591	£101,583	£892,221
Adventure Golf Income	£139,650	£172,967	£207,560	£211,711	£215,945	£220,264	£224,669	£229,163	£233,746	£238,421	£2,094,096
High Ropes Income	£257,250	£318,623	£382,347	£389,994	£397,794	£405,750	£413,865	£422,142	£430,585	£439,197	£3,857,545
Total Income	£973,129	£1,191,738	£1,418,702	£1,447,076	£1,476,018	£1,505,538	£1,535,649	£1,566,362	£1,597,689	£1,629,643	£14,341,543
EXPENDITURE											
Grass Football Pitch Maintenance	£41,500	£42,330	£43,177	£44,040	£44,921	£45,819	£46,736	£47,670	£48,624	£49,596	£454,413
ATP R&M	£30,000	£30,600	£31,212	£31,836	£32,473	£33,122	£33,785	£34,461	£35,150	£35,853	£328,492
ATP Operational costs	£17,357	£17,704	£18,058	£18,419	£18,787	£19,163	£19,546	£19,937	£20,336	£20,743	£190,049
ATP Staffing Costs	£15,000	£15,300	£15,606	£15,918	£16,236	£16,561	£16,892	£17,230	£17,575	£17,926	£164,246
Tennis Courts R&M	£3,000	£3,060	£3,121	£3,184	£3,247	£3,312	£3,378	£3,446	£3,515	£3,585	£32,849
Café R&M (landlord costs)	£7,500	£7,650	£7,803	£7,959	£8,118	£8,281	£8,446	£8,615	£8,787	£8,963	£82,123
Nursery R&M (landlord costs)	£7,500	£7,650	£7,803	£7,959	£8,118	£8,281	£8,446	£8,615	£8,787	£8,963	£82,123
Community Room Staffing Costs	£5,400	£5,508	£5,618	£5,731	£5,845	£5,962	£6,081	£6,203	£6,327	£6,453	£59,128
Community Room Operational Costs	£5,873	£5,990	£6,110	£6,232	£6,357	£6,484	£6,613	£6,746	£6,881	£7,018	£64,302
Multi-Use Activity Staffing Costs	£37,500	£38,250	£39,015	£39,795	£40,591	£41,403	£42,231	£43,076	£43,937	£44,816	£410,615
Multi-Use Activity Operational Costs	£21,150	£21,573	£22,004	£22,445	£22,893	£23,351	£23,818	£24,295	£24,781	£25,276	£231,587
Clip n Climb Staffing Costs	£108,600	£110,772	£112,987	£115,247	£117,552	£119,903	£122,301	£124,747	£127,242	£129,787	£1,189,140
Clip n Climb Operational Costs	£34,650	£35,343	£36,050	£36,771	£37,506	£38,256	£39,022	£39,802	£40,598	£41,410	£379,408
Soft Play Staffing Costs	£43,800	£44,676	£45,570	£46,481	£47,411	£48,359	£49,326	£50,312	£51,319	£52,345	£479,598
Soft Operational Costs	£12,750	£13,005	£13,265	£13,530	£13,801	£14,077	£14,359	£14,646	£14,939	£15,237	£139,609
Adventure Golf Staffing Costs	£24,000	£24,480	£24,970	£25,469	£25,978	£26,498	£27,028	£27,568	£28,120	£28,682	£262,793
Adventure Golf Operational Costs	£29,925	£30,524	£31,134	£31,757	£32,392	£33,040	£33,700	£34,374	£35,062	£35,763	£327,670
High Ropes Staffing Costs	£217,200	£221,544	£225,975	£230,494	£235,104	£239,806	£244,602	£249,495	£254,484	£259,574	£2,378,279
High Ropes Operational Costs	£55,125	£56,228	£57,352	£58,499	£59,669	£60,862	£62,080	£63,321	£64,588	£65,879	£603,603
Site Maintenance	£50,000	£51,000	£52,000	£53,060	£54,122	£55,204	£56,308	£57,434	£58,583	£59,755	£547,486
Central Overheads (8% income)	£71,686	£88,788	£106,546	£108,677	£110,850	£113,067	£115,329	£117,635	£119,988	£122,388	£1,074,953
Operator Profit (6% of income)	£53,764	£66,591	£79,909	£81,508	£83,138	£84,800	£86,496	£88,226	£89,991	£91,791	£806,215
Total Expenditure	£893,279	£938,565	£985,304	£1,005,011	£1,025,111	£1,045,613	£1,066,525	£1,087,856	£1,109,613	£1,131,805	£9,482,467
Total Surplus / (Subsidy)	£79,849	£253,173	£433,398	£442,066	£450,907	£459,925	£469,124	£478,506	£488,076	£497,838	£4,859,077
								Annual Average			£405,286

17 APPENDIX 7: PRELIMINARY ECOLOGICAL APPRAISAL

17.1.1 Provided as separate document.

18 APPENDIX 8: REPORT ON PUBLIC ENGAGEMENT

18.1.1 Provided as separate document.



This report has been written by The Sport, Leisure and Culture Consultancy (SLC). SLC was established in 2009 and advises organisations by developing effective strategies, planning sustainable facilities and procuring successful operational partnerships.

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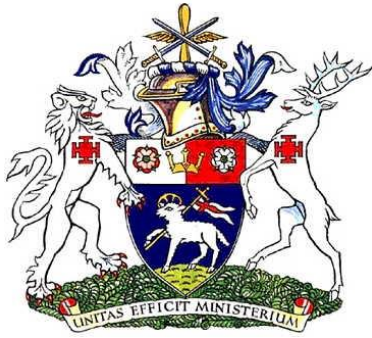
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Policy and Resources Committee

16 June 2021



Title	Edgware Growth Area Supplementary Planning Document
Report of	Chairman of the Policy and Resources Committee
Wards	Edgware, Hale, Burnt Oak
Status	Public
Urgent	No
Key	Yes
Enclosures	Appendix A - Edgware Growth Area Supplementary Planning Document Appendix B - Schedule of Representations and Responses to Draft Supplementary Planning Document
Officer Contact Details	James Gummery – Principal Planning Policy Officer T: 0208 359 7756 Email: james.gummery@barnet.gov.uk Nick Lynch – Planning Policy Manager T: 0208 359 4211 Email: Nick.lynch@barnet.gov.uk Neeru Kareer – Assistant Director, Planning and Building Control T: 0208 359 7477 Email: Neeru.Kareer@Barnet.gov.uk

Summary

The Edgware Growth Area Supplementary Planning Document (SPD) is being prepared jointly by the boroughs of Barnet and Harrow to guide the successful rejuvenation of Edgware Town Centre. The SPD provides a planning framework for attracting investment through a coordinated approach that allows renewal and recovery, enabling Edgware to better serve as a destination for local residents and business. The SPD sets out a vision for this Major Town Centre and proposes 16 objectives and 9 development principles to guide a comprehensive approach to redevelopment. It identifies local needs, challenges and opportunities and sets out how the key opportunity sites should come forward, as well as providing guidance for design, high quality homes, public realm, and transport matters.

The SPD underwent a six-week period of public consultation that included two online public events and three young-person focused sessions. There were 77 email responses and 142 online questionnaires completed. The responses received have shaped the final document.

Officers Recommendations

That the Policy and Resources Committee:

- 1. Consider the responses to consultation on the Edgware Growth Area Supplementary Planning Document (SPD) as set out in Appendix B);**
- 2. Adopts the Edgware Growth Area Supplementary Planning Document (SPD) at Appendix A.**
- 3. Delegates authority to the Deputy Chief Executive, in consultation with the Chairman of the Policy and Resources Committee, to make any further minor changes to the Edgware Growth Area SPD arising as a result of formal consideration by the London Borough of Harrow.**

1. WHY THIS REPORT IS NEEDED

- 1.1 Edgware Town Centre has a long and proud history. The town centre is popular, diverse and valued, providing extensive shopping, cafes, restaurants and services for communities in Barnet and beyond.
- 1.2 The presence of Edgware Underground Station at the end of the Northern Line, along with Edgware Bus Station, makes the town centre a significant public transport hub serving needs for shopping, leisure and work, as well as commuting into Central London. The Town Centre is an important commercial driver of the local economy and provides a range of important employment opportunities, largely in retail, transport and office uses.

There is also much valued local community infrastructure, including a primary school, a library, religious buildings, and numerous active community organisations.

- 1.3 Despite its many advantages, the town centre has experienced a range of pressures in recent years, like many town centres and high streets nationally. There has been a significant shift in retail resulting in the loss of major retail anchors - perhaps most notably Marks and Spencer - as more people have moved to shopping online or have been attracted to out of town retail centres.
- 1.4 In addition to the decline of retail, Edgware Town Centre experiences other pressures including significant traffic congestion, anti-social behaviour and a poor public realm environment and neglected heritage. Of particular note, the Railway Hotel is Grade II listed and a valued local landmark, but the privately-owned building is disused and in poor condition, despite the Council applying its powers. As part of Edgware's renewal the Railway Hotel building needs to be restored and brought back in to use.
- 1.5 The SPD seeks to enhance the current assets of the town centre and identify where there are opportunities for improvement and development. It sets out a shared vision for a thriving town centre, guiding regeneration and renewal activity by both LB Barnet and LB Harrow as well as encouraging investment by private landowners, investors and other public sector bodies.
- 1.6 The SPD provides a strong focus on diversifying the town centre offer, helping to attract new uses. This includes significantly improving the cultural and leisure offer, a far better public realm, and new areas of public open space.

Strategic Context

- 1.7 London continues to grow, with rising populations moving out of central into outer London suburbs placing demands for more housing, jobs and supporting infrastructure. Through the London Plan the Mayor has established the capital's growth needs and sets housing targets for all 33 boroughs. The London Plan sets out where the Mayor wants that growth to be delivered, within an emphasis on directing development towards land that:
 - Is brownfield and within or on the edge of town centres;
 - Is well connected by existing or planned public transport;
 - Can intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 1.8 Through Barnet's emerging Local Plan the Borough is responding to the Mayor's growth requirements by identifying suitable places, including Edgware Town Centre, where new housing, employment and supporting infrastructure can be delivered. This SPD seeks to ensure that alongside growth we also see the delivery of benefits for the local community including improvements to the physical and commercial environment, transport, housing, and social infrastructure such as schools and healthcare.
- 1.9 Back in 2013 the Council adopted the Edgware Town Centre Framework as a mechanism for revitalising Edgware's retail elements, in particular the Broadwalk Centre, and public realm. The Town Centre Framework has not helped to progress the health of

Edgware, having been produced before the ongoing changes to town centres across Barnet and London-wide, in particular the decline of major retail stores, and the increased pressure for new homes.

- 1.10 The approach of locating sustainable growth in suitable town centres accords with London Plan Policy GSS2 Making the Best Use of Land and Core Strategy Policy CS1 on promoting mixed use development in priority town centres. Barnet's Draft Local Plan (Reg 18) identifies town centres as locations for sustainable growth, an approach which is carried forward in the Publication Draft Local Plan (Reg 19), and subject to P&R Committee approval under a separate report item. The emerging Local Plan provides strategic support for the SPD area through Policy GSS05 Edgware Growth Area. It also identifies broad parameters for growth through two major development sites (Site 27 Edgware Town Centre and Site 28 Edgware Underground & Bus Stations).
- 1.11 COVID-19 has altered many aspects of day to day life. Although long-term impacts are hard to fully gauge at present there are likely to be changes which effect Edgware, including shopping habits, work patterns and the need for essential local amenities such as access to open space. COVID-19's impact further reinforces the need to renew and broaden the offer provided by Edgware Town Centre creating one which is clear, distinctive and diversified, with the aim of both retaining spending from the local population and drawing in new custom from a wider area.

Early Engagement

- 1.12 The Council undertook early engagement on the SPD through:
- Local Plan Reg 18 Consultation in early 2020 (approved by P&R Committee for public consultation 6 January 2020)
 - A cross-borough Member workshop in May 2020 which sought the views of local Councillors in Barnet and Harrow;
 - A local stakeholder (businesses and community groups) event in July 2020 which provided an update on the emerging SPD and sought their input.
 - A project team with landowner representation including TfL met regularly during plan preparation.
- 1.13 Key issues raised included crime and anti-social behaviour, heavy traffic congestion through the town centre, concerns about the state of retail on Station Road, poor public realm, and the lack of open or public spaces.
- 1.14 The Edgware Growth Area SPD was prepared in the context of the Council's approach to COVID19 recovery with the "Thriving" theme focusing on economic recovery and growth. The Thriving theme has four emerging strands of work, which are 1) Skills and Employment, 2) Town Centres 3) Regeneration, and 4) Infrastructure, all four relevant to Edgware.
- 1.15 The key renewal site of the Broadwalk Centre (which includes the extensive car parking areas to the rear) was acquired by the Ballymore Group in 2020. The neighbouring site, comprising the underground rail station, track areas and the bus station, is owned by Transport for London. The Council has held discussions on the future of these sites with both the Ballymore Group and TfL. It is understood that the Ballymore Group and TfL are

engaged in a cooperative joint approach to regeneration. The adoption of a planning framework to guide this investment and broader town centre recovery is opportune.

Public Consultation

- 1.16 Public consultation on the Draft SPD was undertaken for six weeks from 11 January to 22 February 2021. Consultation communication included the Engage Barnet website, promotion through the Council's social media accounts, emails and letters to the planning consultation database, a flyer to all addresses within 1km of SPD boundary, and a notice in the local press. Due to COVID-19 restrictions the two public consultation sessions were held online, attracting approximately 150 attendees. There were also three young person focused online consultation sessions - one of these with the Barnet Youth Board - involving overall a total of 29 young people aged 12 upwards and diverse in terms of gender and ethnicity. A cross-borough local Member meeting was also held.
- 1.17 Feedback received included 77 email responses, 142 completed online questionnaires, and feedback from the consultation sessions. The email respondents included statutory consultees, local organisations, and residents (see Appendix B).
- 1.18 Overall, local residents expressed support for the Vision, Objectives and Principles in the SPD, and the need to support investment in the town centre. There is a desire to see an improved environment with more green spaces and trees, and to create a better place for cyclists and pedestrians. Concern was expressed over the lack of pedestrian crossings, with existing crossings often poorly sited, phased and managed. There is a desire for improved security around the town centre. People would like more culture and leisure activities, and suggested drawing on local community, cultural and artistic groups. Key concerns expressed were that new development would be high density and include tall buildings, negatively affecting the character of Edgware Town Centre. Increasing population was seen as an issue in adding to pressure on community services such as doctors and schools, while increasing congestion. Loss of car parking for shopping was raised as a concern due to making access more difficult, particularly for less mobile people.
- 1.19 The consultation sessions with young people led to more specific concerns over the town centre, including the lack of space to sit out and meet with friends for food and leisure. There is also a desire for more local jobs for younger people to avoid travelling out of the area for work, and to support student studies. As with the wider community, there was concern over congestion, pollution and noise, and anti-social behaviour.
- 1.20 Further references to sustainable transport were requested by stakeholders, particularly relating to supporting cycling and pedestrians, improving bus access, and maintaining key London Underground infrastructure.
- 1.21 The need to strength environment issues was raised by stakeholders, in particular in relation to flood risk, tackling climate change, and supporting biodiversity.
- 1.22 Landowners sought clarification over design guidance and the need for flexibility to achieve optimal redevelopment of the site.

- 1.23 Stakeholders commented on the need to expand references to heritage, protecting the context of heritage assets, while using Edgware’s history to support renewal.
- 1.24 The comments received were assessed and used to inform and update the SPD.

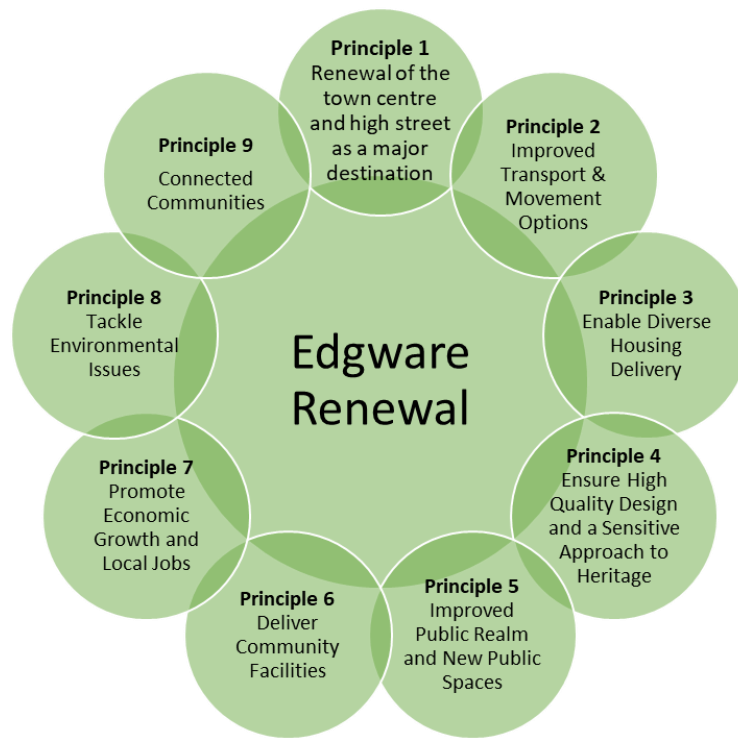
SPD Objectives and Development Principles

- 1.25 The SPD establishes a Vision which is supported by objectives that set out how the Vision will be realised:

Objective	Description
Objective 1	Major Town Centre status retained and enhanced. The core functions of Edgware Town Centre will be retained, supported and enhanced. Edgware will be developed as a destination with a diverse retail, commercial, leisure and cultural offering that attracts people from a wide catchment area to support our existing local businesses and local economy. The retail offer will be focused on Station Road as the main shopping thoroughfare to ensure the traditional shopping parades are maintained and enhanced. Edgware’s commercial offering will be supported by new homes, bringing people closer to the activities of the town centre. This coupled with improvements to the public realm and shift towards a greener, cleaner local environment will also improve the Town Centre experience for visitors, existing and new residents alike.
Objective 2	A significant cultural and leisure offering, including support for the evening economy. Provide new attractions that make Edgware a destination location and draw people in from a wide area while supporting local identity and the economy. Potential options include a new cinema, swimming pool and a diverse range of eating-out options that support a safe evening economy.
Objective 3	Improving transport options - Edgware Town Centre will move towards being more sustainable, with better options to walk, cycle or take the bus to the Town Centre for those living locally and better public transport options for those coming from further afield. Improvements to transport options aim to deliver a far better local environment and seek to ameliorate traffic congestion.
Objective 4	New public transport interchange. Create a better sense of arrival in Edgware with an improved relationship between the rail and bus stations and the wider town centre to reduce congestion, improve the pedestrian experience and increase convenience and choice in transport modes.
Objective 5	Efficient land use. Comprehensive regeneration of key sites that will support the town centre and deliver much needed new homes to a well-connected location.
Objective 6	Deliver new homes on well-connected, brownfield land. Meet housing needs by increasing the delivery of new homes. High level capacity studies indicate that the SPD area could deliver thousands of

	new homes which would be a mix of sizes, types and tenures to accommodate a wide need. Sites would need to comply with design and local planning guidance.
Objective 7	High quality design that will stand the test of time. Ensure that new development is rooted in good design and meets the challenge of its locational context across Edgware's varied town centre with a focus on appropriate massing and height.
Objective 8	Celebrate local heritage. Edgware's valued historical buildings and heritage must be protected and restored and constitute an essential part of the town centre renewal.
Objective 9	New and improved public spaces. Deliver new, linked public open spaces and transform the streets and footpaths to provide pleasant clean and safe environment for pedestrians and cyclists.
Objective 10	Meet the need for local community infrastructure. Ensure new development makes resources available for facilities including schools, GP surgeries, community groups and sports.
Objective 11	Economic growth and local jobs. Generate investment that leads to sustainable economic growth, with existing businesses benefiting from increased footfall, and provides employment and skills opportunities for local jobs.
Objective 12	Tackle climate change and pollution. Ensure that development mitigates and adapts to climate change, including flood risk, and reduces air and noise pollution.
Objective 13	Increase biodiversity and environmental resilience. Protect existing and create new habitats that supports diverse wildlife.
Objective 14	A safe place to live, work and visit. Ensure that people feel safe by designing out crime and anti-social behaviour.
Objective 15	Support health & wellbeing. Development and change must holistically support physical and mental wellbeing.
Objective 16	A diverse and family-friendly community. Meet the needs of people from all social backgrounds and ensure that families and children feel safe and included.

1.26 Beneath the objectives are a set of inter-locking principles which will guide sustainable development to bring forward the renewal of the town centre. These are shown in the diagram below:



2. REASONS FOR RECOMMENDATIONS

- 2.1 The Edgware Growth Area SPD will enable the Council to influence and successfully steer the renewal of Edgware Town Centre delivering significant and sustainable housing growth and a much-improved and attractive town centre offer including new leisure and cultural uses.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 The alternative would be to not adopt this SPD. An opportunity to shape the future growth of Edgware would be lost at a time when key development proposals in the town centre are emerging.

4. POST DECISION IMPLEMENTATION

- 4.1 When adopted the SPD will be a material consideration in the determination of relevant planning applications within the Edgware Town Centre and the defined SPD area (as delineated by the red line boundary). LB Harrow are taking the SPD to Cabinet for adoption on 17 June 2021.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 The Edgware Growth Area SPD will help to meet Barnet's Corporate Plan 2021-25 four

priorities:

- **Clean, safe and well-run** - the SPD will support renewal of Edgware Town Centre that delivers an improved environment, new housing and better opportunities for leisure and work. Investment must be used to reduce crime and anti-social behaviour.
- **Family Friendly** – the SPD will support a balanced and sustainable family friendly community that is engaged with the process of change and renewal.
- **Healthy** – the SPD help to provide a healthier environment where people are encouraged to lead active lives and engage with local community life.
- **Thriving** – the SPD seeks a much-improved public realm in Edgware that encourages pride in the local area. Developers will be encouraged to invest in the town centre to enable sustainable regeneration that provides new homes, new economic activity, and increases job opportunities for local people.

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

5.2.1 In April 2019 the Council was awarded £175,000 funding from the GLAs Homebuilding Capacity Fund (HCF) to support the joint preparation of the Edgware SPD with LB Harrow (£17,500 of the award to be shared with Harrow). The award required that the project be completed within two years and all costs have already been billed and paid for by the council in prior financial years (to LB Harrow and Regional Enterprise). There are no further financial implications as a result of approving this report.

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.

5.3.2 The Edgware Growth Area SPD fully supports a wide range of social, economic and environmental benefits.

5.3.3 Renewal of Edgware Town Centre will involve redevelopment of major sites to provide a large quantum of new housing and enable delivery of new town centre uses, bringing social and economic benefits. Greatly improved public realm, including new public spaces, will lead to a much better environment. The SPD supports a much-improved environment for pedestrians and cyclists, along with improved public transport facilities, providing better options for more sustainable transport modes.

5.4 Legal and Constitutional References

5.4.1 Article 8 of the Constitution provides that the Council may establish joint arrangement with one or more local authority. The Planning & Compulsory Purchase Act 2004 (“PCPA

2004”) and in particular Regulation 8 and 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 provide guidance on the preparation and adoption of supplementary planning documents. In dealing with an application for planning permission (or permission in principle) the local planning authority (LPA) shall have regard to, amongst others, the provisions of the development plan (so far as material) and to any other material considerations (s.70(2), Town and Country Planning Act 1990 as revised).

- 5.4.2 Section 38(6) of the PCPA (2004) states that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 5.4.3 SPDs are not part of the development plan. They provide further detailed guidance on topics in development plan policies and may not allocate land uses or create new planning policies. SPDs must be prepared in accordance with the Council’s local development scheme (s.19(1), PCPA 2004) and its Statement of Community Involvement (“SCI”) (s.19(3), PCPA 2004). The SCI sets out the Council’s policy for consulting and engagement with individuals and stakeholders.
- 5.4.4 In accordance with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 , the Council must publish, prior to adoption, a consultation statement explaining (i) who was consulted, (ii) a summary of the issues raised through representations and (iii) how any such issues raised in representations have been addressed in the SPD
- 5.4.5 The proposed SPD will be a “local development document” (s.17(7)(za), PCPA 2004 and reg. 5 (iii), 2012 Regulations) and will be prepared jointly by the LB Harrow and LB Barnet (s28, PCPA 2004). It will not be part of the Local Plan but will supplement the policies in the Local Plan and will be a material consideration in determining planning applications.
- 5.4.6 The proposed SPD must be adopted by a resolution of each participating council as the LPA for its administrative area (s.17(8)(a) and s28(3), PCPA 2004).
- 5.4.7 Under the Council’s Constitution, Article 7 Committees, Forums, Working Groups and Partnerships paragraph 7.5 (Responsibility for Functions) sets out that the Policy and Resources Committee is responsible for the overall strategic direction of the Council including responsibility for Local Plans (except for matters reserved to Full Council). Article 4 reserves decisions on the development plan document comprising the Local Plan to the Full Council. The Edgware Growth Area SPD is not part of the Local Plan, it supplements it.
- 5.4.8 The proposed SPD is in accordance with Section 28(5) of the PCPA 2004 which provides that if the authorities preparing the SPD include one or more London boroughs the SPD should be in general conformity with the spatial development strategy (s.24).

5.5 Risk Management

- 5.5.1 Not adopting the SPD also risks the Council having less influence to ensure successful renewal and positive outcomes in Edgware Town Centre.

5.5.2 A key risk to the Edgware SPD is that it is challenged in the High Court following adoption by the Council. The challenge must take place within 6 weeks of adoption. This has been mitigated by ensuring that the SPD is fully compliant with Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a comprehensive six weeks of consultation and ensuring that all the consultation responses have been carefully considered and taken into account.

5.6 Equalities and Diversity

5.6.1 An Equality Impact Assessment (EqIA) assesses whether a policy, strategy or approach affects any groups, in respect of the protected characteristics defined by the Equality Act 2010, and whether there is a significant positive, negative or neutral impact on groups before a policy is formally introduced. The protected characteristics are - age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The EqIA found the SPD to have a neutral or neutral/ positive impact on the Edgware communities.

5.7 Corporate Parenting

5.7.1 N/A

5.8 Consultation and Engagement

5.8.1 Early consultation to understand the local issues and needs was undertaken to inform the draft SPD. A cross-borough Member workshop in May 2020 sought the views of local Councillors in Barnet and Harrow, while an event in July engaged with approximately 18 local stakeholders (businesses and community groups) to provide an update on the emerging SPD and seek their input. A *Designing Out Crime* Visual Audit of Edgware Town Centre was undertaken in September with the Metropolitan Police's Designing out Crime team, along with Community Safety and Planning officers, to identify potential crime reduction recommendations relating to the built-environment which could help reduce crime and the fear of crime.

5.8.2 Public consultation was undertaken for six weeks from 11 January to 22 February 2021 - further details are set out in the section above on public consultation. The responses received were assessed and used to inform and update the final version of the SPD.

5.9 Insight

5.9.1 N/A

1. BACKGROUND PAPERS

- a. Policy & Resources Committee - 6th January 2020 (Item 13) – Barnet’s Local Plan – Preferred Approach - (Reg 18)
<https://barnet.moderngov.co.uk/documents/s56947/Reg%2018%20PR%20Committee%20Report2.pdf>
- b. Cabinet – 23rd June 2013 – Edgware Town Centre Framework
<https://barnet.moderngov.co.uk/documents/s9223/Edgware%20TC%20Framework%20Cabinet%20report%20for%20clearance.pdf>
- c. Barnet Local Plan Core Strategy DPD, September 2012
<https://www.barnet.gov.uk/sites/default/files/assets/citizenportal/documents/planningconservationandbuildingcontrol/PlanningPolicy/LocalPlan/DPD/LocalPlanCoreStrategyDPDSeptember2012.pdf>
- d. Barnet Development Management Policies DPD, September 2012
<https://www.barnet.gov.uk/sites/default/files/assets/citizenportal/documents/planningconservationandbuildingcontrol/PlanningPolicy/LocalPlan/DPD/Barnet27sLocalPlanDevelopmentManagementPoliciesplanning.pdf>
- e. Barnet’s Statement of Community Involvement – COVID 19 Addendum
<https://barnet.moderngov.co.uk/documents/s60203/Barnets%20Statement%20of%20Community%20Involvement%20-%20COVID%2019%20Addendum.pdf>
- f. Edgware Growth Area SPD Sustainability Appraisal, June 2021
- g. Edgware Growth Area SPD Equalities Impact Assessment, June 2021
- h. Edgware Growth Area SPD Consultation Statement, June 2021



Edgware Growth Area

Supplementary Planning Document

June 2021

Preface

Edgware Town Centre has a diverse character, vibrant community and excellent commercial opportunities including for retail, office and leisure. There are also enormous opportunities to bring improvements to Edgware through positive change and growth.

The town centre falls within the boroughs of both Barnet and Harrow and the councils jointly prepared this Supplementary Planning Document (SPD) to guide how Edgware Town Centre can successfully undergo renewal and better serve as a destination for local residents and businesses.

The SPD supports comprehensive redevelopment of key sites to reflect Edgware's status as a major town centre, reinforce the role of the high street, provide new public spaces and make the street environment more attractive. The environment for pedestrians and cyclists will be improved, providing better options for more sustainable transport and safe and active movement. The town centre will also provide opportunities for new high quality homes, including affordable housing.

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1.

Introduction



Figure 1 – Inter-war shopping frontage on the corner of Hale Lane

1. Introduction

- 1.1. Edgware has evolved from a small market town into a major town centre¹ and a well-known suburban hub of North London. The centre is situated in the north-west corner of Barnet and extends into a small part of Harrow. Edgware has a long and proud history. The town centre is popular, diverse and valued, providing extensive shopping, cafes, restaurants and services for communities in both boroughs, north London and beyond.
- 1.2. The presence of Edgware Underground Station at the end of the Northern Line, along with Edgware Bus Station, make it a public transport hub. People use the buses and tube to access Edgware for shopping, leisure and work, while commuters can travel in directly to Central London.
- 1.3. The Town Centre is an important commercial driver of the local economy and provides a range of important employment opportunities, largely in high street retailers and office work.
- 1.4. There is also much valued local community infrastructure, including a primary school, a library, religious buildings, and numerous active community organisations.
- 1.5. Edgware has attractive inter-war shopping frontages, along with many nationally and locally listed buildings across the town centre. Edgware has a long and interesting history which is reflected in important heritage buildings that provide distinctive designs and links to the past.

- 1.6. Despite its many advantages as a destination, the town centre has experienced a range of pressures in recent years like many town centres and high streets nationally. In common with similar town centres there has been a significant shift in retail resulting in the loss of major retail anchors as more people have moved to shopping online or attracted to out of town retail centres as they expand their offering.

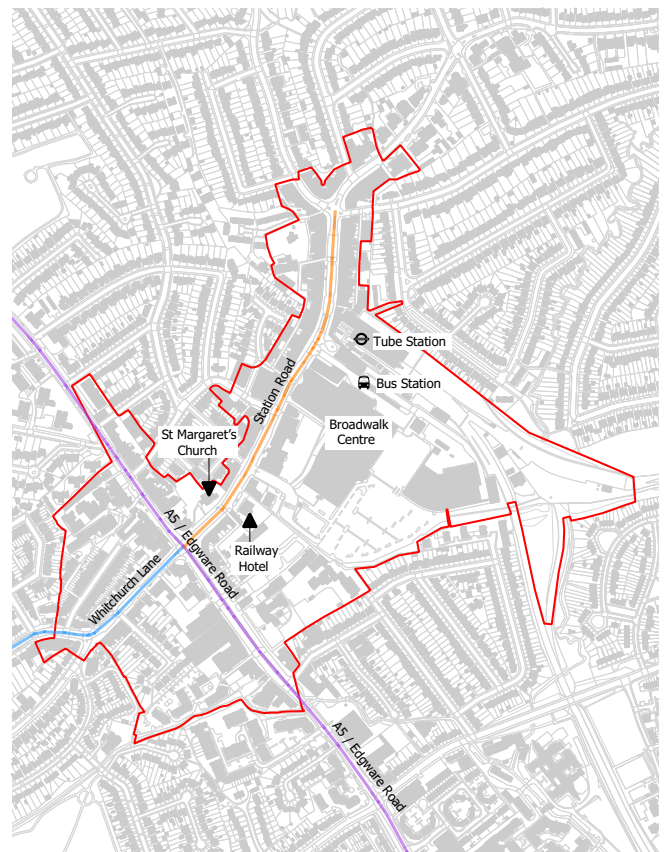


Figure 2 – Key features within the Edgware SPD Boundary

¹ A Major Town Centre is defined within the London Plan Hierarchy and generally contain over 50,000 sqm retail, leisure and service floorspace. They may also have significant employment, leisure, service and civic functions.

- 1.7. This SPD seeks to build on the current assets of the town centre and identify where there are opportunities for improvement and development. It sets out a clear vision for a town centre that will guide regeneration and renewal activity by the councils as well as encourage investment into the town centre by landowners, investors and other public sector bodies. It aims to deliver the vision both Barnet and Harrow Councils have for a reimagined Edgware Town Centre and thriving high street.
- 1.8. Edgware is very well connected by tube and bus, however, travelling to the town centre by more sustainable and active means is less appealing and often not so easy. Major routes along the A5 and Station Road are heavily trafficked, which adds to air and noise pollution and a poor environment. The A5/ High Street creates a physical barrier when travelling east/west to or from the main shopping areas and Edgware Station. Furthermore, the presence of the tube lines, along with poor quality pathways connecting south of the Broadwalk Centre car park, make for difficult access to the residential areas to the south and east of the town centre.



Figure 3 – The Boardwalk Centre frontage on to Station Road

- 1.9. The public realm, comprising footpaths and the streetscape environment, is often not as good as it could be. In particular there is a lack of open public green spaces within the town centre, with no parks and little tree coverage or planting. Where planting has taken place, most notably the street trees along the north eastern part of Station Road, it is already having a beneficial effect.
- 1.10. The town centre lacks a sense of arrival, despite the huge flow of people through the Underground and bus stations. This misses the opportunity for a pleasant and welcoming heart to Edgware which encourages people to visit and enjoy the town centre.

- 1.11. Some of Edgware's building frontages are not shown in their best light due to excessive signage. Areas to the buildings' rear are often poorly maintained, encouraging anti-social behaviour and crime. Some of Edgware's heritage is well cared for and well used. In other cases, particularly the privately owned Railway Hotel, the buildings have been neglected and must be restored and brought back to suitable uses.
- 1.12. To the rear of the Railway Hotel and within the wider area known as Forumside, is a large area of brownfield land sometimes used for illegal dumping. It has become a blight on the town centre and encourages anti-social behaviour, including further littering and fly-tipping. The whole area to the south of the Broadwalk Centre and Railway Hotel often does not feel welcoming or safe. The Broadwalk Centre car park means this area is dominated by vehicles rather than pedestrians, while the long Church Way footpath which connects Station Road to Fairfield Crescent feels enclosed and isolating.

Strategic Context

- 1.13. London continues to grow, with rising populations moving out of central into outer London suburbs placing an ever-increasing pressure on the need for more housing, jobs and supporting infrastructure.
- 1.14. Through the London Plan the Mayor establishes the growth needs for London and places housing targets for all 33 boroughs. The London Plan sets out where the Mayor would prefer to see growth delivered, within an emphasis on directing development towards land that:
- Is brownfield and within or on the edge of town centres;
 - Is well connected by existing or planned public transport;
 - Can intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 1.15. Outer London boroughs like Barnet and Harrow are required to meet the Mayor's growth requirements through our local plan documents by identifying suitable places where new housing and supporting infrastructure could be delivered.
- 1.16. The Mayor's Good Growth Principles underpin this approach, in particular Policy GG2 Making the best use of land, which expects application of a design-led approach to determine the optimum capacity of sites. A high density approach in

Edgware Town Centre is a sustainable way of meeting the boroughs growth needs while protecting precious green spaces, including Green Belt.

- 1.17. This SPD seeks to ensure that alongside growth we also see the delivery of benefits for the local Edgware community within Barnet and Harrow, including improvements to the physical and commercial environment, transport, housing, and social infrastructure such as schools and healthcare. This should be green growth that delivers benefits for the natural environment, including tackling climate change.

Managing Growth

- 1.18. The town centre offers a diverse range of shops, cafes and restaurants, including numerous independent outlets reflecting the mixed local community. The Broadwalk Centre and central parts of Station Road support some national high street chains.
- 1.19. Retailers and high streets have undergone huge changes in recent years, largely due to the rise of internet shopping as people make fewer physical purchases in town centres. This trend may have been further accelerated by the Covid-19 pandemic altering many aspects of day to day life. While the long-term impacts are hard to fully assess immediately, it appears shopping habits are being affected. There are also likely to be changes to work patterns and the need for improved essential local amenities such as access to open space.
- 1.20. Edgware Town Centre hosts a range of non-retail uses, including a significant amount of office space for professional and commercial services. There are diverse community uses such as buildings for community organisations, education, healthcare, religious uses, and a library. There is also a presence of leisure uses including a fitness gym.
- 1.21. Town centre uses on ground floors can be expanded and the frontages activated to provide a much-improved town centre experience. Public squares should play a key role in creating vibrant community spaces where people congregate to shop, eat out, and socialise in a welcoming and attractive environment.
- 1.22. To secure its status as a major town centre Edgware needs a sustainable response to a changing world. There must be compelling reasons for people to choose to visit and stay in the town centre, generating a positive and self-sustaining circle of renewal. Edgware can draw on its unique character and features while seeking new offerings to enhance the town centre's appeal and support its businesses. Edgware has

an enormous opportunity to significantly improve its leisure and cultural experience to draw more people to the town centre during the day and evening. This could mean more entertainment such as a cinema, increased eating out options, and leisure such as sports activities.

- 1.23. The Edgware town centre experience can be greatly improved for pedestrians and cyclists through improvements to the street environment and dedicated routes. While public transport access is already good, the relationship of the tube and bus facilities with the surrounding town centre could be made much better. There will continue to be provision of car parking spaces for town centre users.
- 1.24. Edgware's economy must be supported to adapt and grow to provide new local job opportunities and an entrepreneurial spirit. Sustainable economic growth within Edgware is vital to supporting a dynamic community and employment opportunities for local people.
- 1.25. Local employment opportunities can be greatly expanded through delivery of workspaces for business start-ups and SMEs (Small & Medium Enterprises). Improving Edgware's economy and job environment will reduce the need to travel into central London and will draw wealth creation into the local area. The Covid-19 pandemic restrictions have demonstrated employees' ability to work remotely and interact with clients and colleagues at a distance. Flexible employment floorspace should be provided and people helped to get the right level of skills to fully access the jobs market.
- 1.26. Within the Town Centre the opportunity for change and growth is supported by extensive areas of brownfield and underused land. These areas can be used to underpin the renewal of Edgware through imaginative development bringing in new investment, homes, new town centre activities and uses, and a much-improved environment.



Figure 4 – Extensive town centre car parking

- 1.27. Developers will be expected to support wider infrastructure investment for improved community facilities, for example in terms of schools, health and well-being and GPs surgeries. This is also the case with improving the public realm, for example with a network of cycle and pedestrian links, new public open spaces, squares, performance and event space that can provide places for pop-ups artists, community activities and leisure.
- 1.28. The design of new development must be appropriate to its context in terms of building scale, with high quality design that improves the town centre. Good design means building frontages should respond to the streets and pathways to give a sense of activity and inclusion, with natural surveillance providing improved security.

issues faced within Edgware, such as poor public realm, traffic congestion, and anti-social behaviour. It also provided a sense of the importance of the town centre to local people, and how they might like to see certain changes, for example the desire for developers to provide community amenities such as improved and new public spaces.

- 1.30. A six-week public consultation was carried out between 11 January and 22 February 2021. Notifications were made to the boroughs' consultee databases, a leaflet drop to all addresses within 1km of the SPD boundary, and social media posts. The SPD documents and a questionnaire were available through the councils' websites. Two public consultation events were held online due to Covid-19 restrictions, with approximately 160 attendees. In terms of response there were 77 emails and 142 questionnaires completed. Responses received were assessed and used to update the SPD.

Consultation Process

- 1.29. Early consultation was carried out during preparation of the SPD to seek the views of local stakeholders, including community organisations, businesses and landowners. The feedback received helped to shape the draft document in terms of understanding the

- 1.31. The process of preparing the SPD will be used as a springboard to ongoing engagement with stakeholders, including landowners, to successfully secure the future roadmap for Edgware Town Centre.

A Joint Council Ambition

- 1.32. The revitalisation of Edgware must meet the overall aims and approaches of both boroughs. These are established through the Barnet 2025 Corporate Plan and the Harrow Ambition Plan 2019. Key aspects of these documents which are relevant to the Edgware SPD are summarised below.

- 1.33. The **Barnet 2025 Corporate Plan** outcomes and priorities that will be supported by the SPD:



Clean, safe and well run: a place where our streets are clean and antisocial behaviour is dealt with so residents feel safe. Providing good quality, customer friendly services in all that we do



Family Friendly: creating a Family Friendly Barnet, enabling opportunities for our children and young people to achieve their best



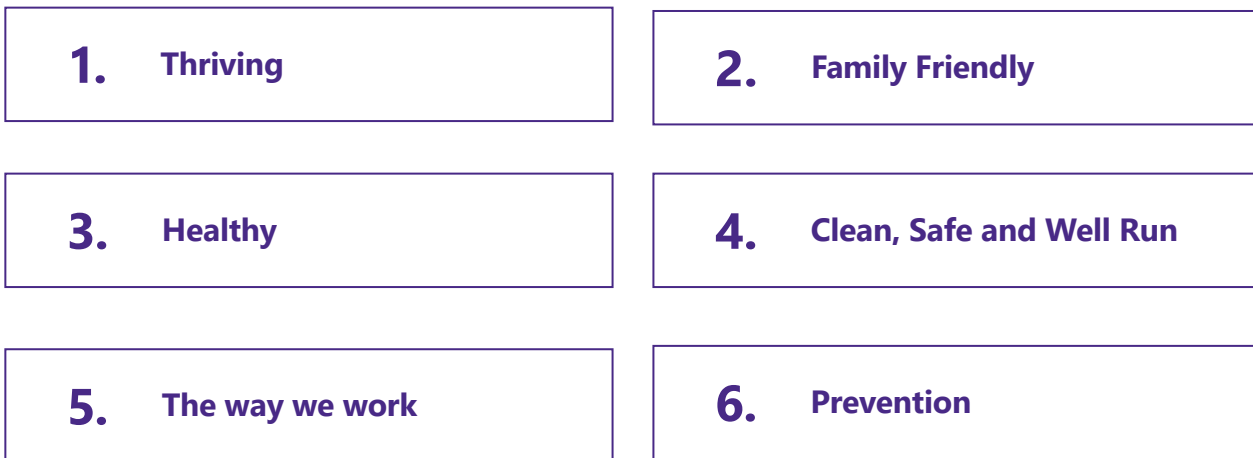
Healthy: a place with fantastic facilities for all ages, enabling people to live happy and healthy lives



Thriving: a place fit for the future, where all residents, businesses and visitors benefit from improved sustainable infrastructure & opportunity.

Barnet's Covid-19 Recovery Programme:

1.34. Barnet Council's approach to recovery from the COVID 19 pandemic has been to develop a recovery framework containing six workstreams, which are aligned with the Corporate Plan.



1.35. The Thriving workstream has four emerging strands of work, which are 1) Skills and Employment, 2) Town Centres 3) Regeneration, and 4) Infrastructure. The detail under each of these is intended to be intrinsically cross-cutting and inclusive of all council service areas. They will be maintained and kept under constant review as the programme evolves over time.

1.36. Edgware town centre will need to respond in the short and longer term to the impacts of COVID in relation to practical delivery and longer term operational and investment models. There is an opportunity now to consider clean growth, low carbon transport, prioritise investments in digital infrastructure and place wellbeing at the heart of the town centre through a sense of identity and belonging.

1.37. Harrow's Ambition Plan 2019 priorities that will be supported by the SPD:

 <p>Building a Better Harrow – Create a thriving modern, inclusive and vibrant Harrow that people can be proud to call home; increase the supply of genuinely affordable and quality housing ensure every Harrow child has a school place; keep Harrow clean; more people are actively engaged in sporting, artistic and cultural activities.</p>	
 <p>Supporting Those Most in Need - Children and young people are given the opportunities to have the best start in life and families can thrive.</p>	 <p>Protecting Vital Public Services – transport infrastructure that supports economic growth, improves accessibility and supports healthy lifestyles; strong and resourceful community sector; continues to be one of the safest boroughs in London.</p>
 <p>Delivering a Strong local Economy for All - strong, vibrant local economy where local businesses can thrive and grow.</p>	 <p>Modernising Harrow Council - Reduce the borough's carbon footprint.</p>

Planning Policy Framework

- 1.38. A supplementary planning document adds detail to the policies in the development plan, providing further guidance for development on specific sites, or on particular issues. This SPD therefore provides specific detailed guidance expanding upon and supporting the London boroughs of Barnet and Harrow Local Plan policies, together with setting out the environmental, social, design and economic objectives in relation to the SPD area. This SPD seeks to provide a clear but flexible planning framework to underpin Edgware as a key destination in North London and establish a clear vision to guide and enable change.
- 1.39. A SPD is not part of the development plan and is a non-statutory document, although it can be a material consideration in planning decisions. As a statement of policy intent, it must still be considered within the overarching planning policy framework for the area.
- 1.40. This SPD is part of a broader framework of national, regional and local policies that will also inform development and planning decisions within Edgware.
- 1.41. Barnet’s Core Strategy Policy CS1 identifies Edgware as a priority town centre. The Draft Local Plan sets out the overall policy position for the SPD area through Policy GSS05 Edgware Growth Area.
- 1.42. Harrow’s Core Policy CS8 Edgware and Burnt Oak provides Harrow’s principles for growth and development in these locations.

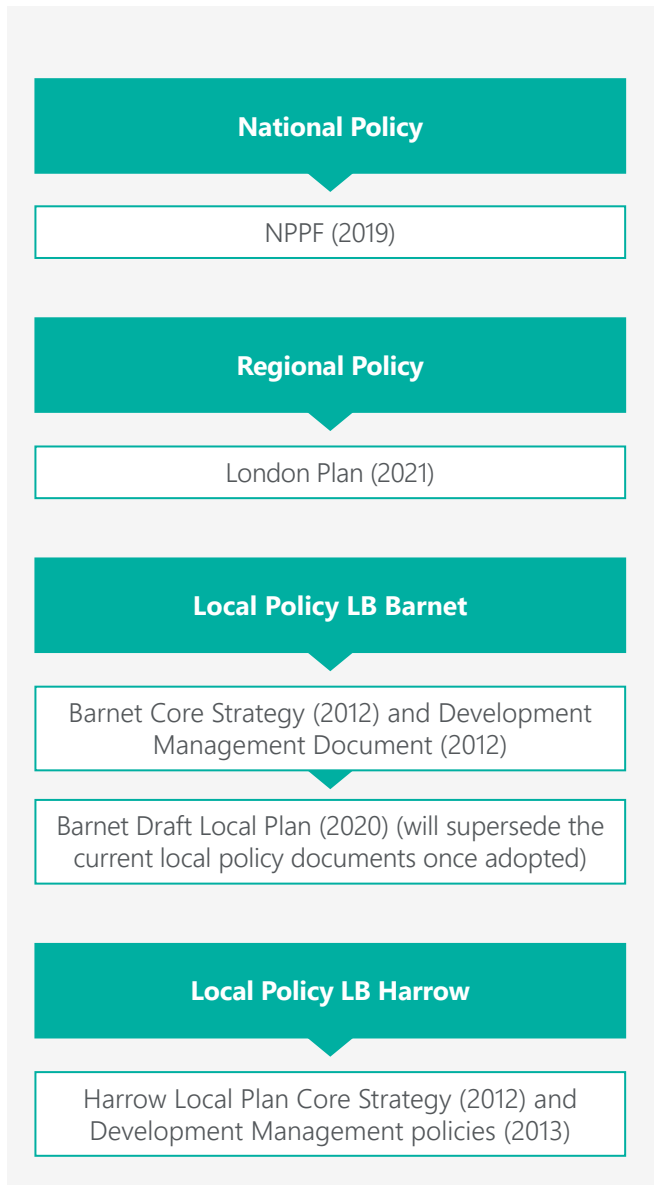


Figure 5 – Satellite image of Edgware with SPD boundary



Figure 6 – The Railway Hotel - a valuable but neglected heritage asset

Supporting Documents

1.43. Several evidence base documents were prepared to support and inform this SPD:

- **Edgware SPD Design Guide** - provides a design analysis of Edgware Town Centre and its immediate surroundings and sets out the design approach for key redevelopment sites and the overall area.
- **Transport Study** - provides analysis of the existing transport situation in Edgware; identifies potential opportunities for change; focussing on enabling movement by sustainable travel modes; assesses the transport and movement implications of potential development; and outlines a range of transport measures and interventions for the future.
- **Edgware Town Centre Economic Strategy** – identifies emerging trends and issues, opportunities and constraints, and suggests land use elements for a redevelopment scheme.

1.44. A Sustainability Appraisal (SA), Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA) of the Edgware SPD have been carried out.

1.45. The SA assesses the Edgware SPD against a range of social, environmental and economic indicators and helps to identify all the likely significant effects. The SA advises on ways in which any adverse effects could be avoided, reduced or mitigated or

how any positive effects could be maximised. This helps to ensure that the emerging SPD promote sustainable development.

1.46. The EqIA ensures that the Edgware SPD does not discriminate in any form (age, sex, race, disability, religion, sexual orientation, marriage/civil partnership, gender reassignment).

1.47. The HIA assesses the impact which the Edgware SPD will have on the health of the local population.

The town centre is popular, diverse and valued, providing extensive shopping, cafes, restaurants and services for communities in both boroughs, north London and beyond.

2.

Vision and Objectives

2. Vision and Objectives

2.1. A vision for Edgware has been established:

Edgware Town Centre will become a vital and vibrant destination open to all and which supports communities across Barnet, Harrow and beyond.

It will provide an outstanding place for modern urban living in a wider suburban context. The environment will feel safe and welcoming at all times.

Edgware's status as a major town centre in North London will be reinforced as a destination for leisure, culture and civic offerings that supports the day and evening economy. The centre will be home to a new thriving commerce – a place in which companies start up and want to move to.

The town centre will celebrate Barnet and Harrow as family-friendly boroughs, meeting the diverse needs of local communities and people of all ages and circumstances.

Edgware will be a healthy town centre with substantial new and integrated public spaces and landscaping to support wellbeing, to encourage visitors to stay, and to bring people together to relax and play.

Improved connectivity will see a move towards more sustainable options by providing pleasant and easily understandable routes for pedestrians and cyclists, alongside effective public transport improvements including a better transport interchange experience.

Edgware's renewal will be enabled by growth, with new homes delivering an inclusive mixed-use approach that makes better use of brownfield land and brings new life into the town centre.

Residential development must unlock social and economic town centre opportunities while being integrated with the surrounding residential areas. High quality public realm, design and architecture will be essential to creating a diverse, distinctive and attractive feel to the area, and will draw on local character and heritage where appropriate to the surrounding context. Renewal of the town centre will be environmentally resilient, addressing climate change, biodiversity and pollution.

Objectives

2.2. The objectives set out how the Vision will be realised over the lifetime of the Plan.

OBJECTIVE	DESCRIPTION
Objective 1	Major Town Centre status retained and enhanced. The core functions of Edgware Town Centre will be retained, supported and enhanced. Edgware will be developed as a destination with a diverse retail, commercial, leisure and cultural offering that attracts people from a wide catchment area to support our existing local businesses and local economy. The retail offer will be focused on Station Road as the main shopping thoroughfare to ensure the traditional shopping parades are maintained and enhanced. Edgware's commercial offering will be supported by new homes, bringing people closer to the activities of the town centre. This coupled with improvements to the public realm and shift towards a greener, cleaner local environment will also improve the Town Centre experience for visitors, existing and new residents alike.
Objective 2	A significant cultural and leisure offering, including support for the evening economy. Provide new attractions that make Edgware a destination location and draw people in from a wide area while supporting local identity and the economy. Potential options include a new cinema, swimming pool and a diverse range of eating-out options that support a safe evening economy.

OBJECTIVE	DESCRIPTION
Objective 3	Improving transport options. Edgware Town Centre will move towards being more sustainable, with better options to walk, cycle or take the bus to the Town Centre for those living locally and better public transport options for those coming from further afield. Improvements to transport options aim to deliver a far better local environment and seek to ameliorate traffic congestion.
Objective 4	New public transport interchange. Create a better sense of arrival in Edgware with an improved relationship between the rail and bus stations and the wider town centre to reduce congestion, improve the pedestrian experience and increase convenience and choice in transport modes.
Objective 5	Efficient land use. Comprehensive regeneration of key sites that will support the town centre and deliver much needed new homes to a well-connected location.
Objective 6	Deliver new homes on well-connected, brownfield land. Meet housing needs by increasing the delivery of new homes. High level capacity studies indicate that the SPD area could deliver thousands of new homes which would be a mix of sizes, types and tenures to accommodate a wide need. Sites would need to comply with design and local planning guidance.
Objective 7	High quality design that will stand the test of time. Ensure that new development is rooted in good design and meets the challenge of its locational context across Edgware's varied town centre with a focus on appropriate massing and height.
Objective 8	Celebrate local heritage. Edgware's valued historical buildings and heritage must be protected and restored and constitute an essential part of the town centre renewal.
Objective 9	New and improved public spaces. Deliver new, linked public open spaces and transform the streets and footpaths to provide pleasant clean and safe environment for pedestrians and cyclists.
Objective 10	Meet the need for local community infrastructure. Ensure new development makes resources available for facilities including schools, GP surgeries, community groups and sports.
Objective 11	Economic growth and local jobs. Generate investment that leads to sustainable economic growth, with new and existing businesses benefiting from increased footfall, and which provides employment and skills opportunities for local people.
Objective 12	Tackle climate change and pollution. Ensure that development mitigates and adapts to climate change, including of flood risk, and reduces air and noise pollution.
Objective 13	Increase biodiversity and environmental resilience. Protect existing and create new habitats that supports diverse wildlife.
Objective 14	A safe place to live, work and visit. Ensure that people feel safe by designing out crime and anti-social behaviour.
Objective 15	Support health & wellbeing. Development and change must holistically support physical and mental wellbeing.
Objective 16	A diverse and family-friendly community. Meet the needs of people from all social backgrounds and ensure that families and children feel safe and included.

3.

Spatial Context









Figure 7 – Illustrative example of urban development at Claredale St, East London (Image credit Ioana Marinescu, Karakusevic Carson Architects)

3. Spatial Context




Socio-economic and population profile

3.1. The Edgware SPD lies largely within three wards: on the Barnet side this is Edgware Ward, for Harrow it is the Edgware and Canons wards. Ward profiles can be used to provide an overview of the makeup of this area.



BARNET - EDGWARE WARD		HARROW - EDGWARE AND CANONS WARDS
<p>18,816 residents in mid-2019 (Projected increase to 19,450 by 2028)²</p>	 Population	<p>Edgware 12,589, Canons 13,735 residents in mid 2019</p>
<p>22% under 15 20% 15-29 38% 30-59 20% over 60</p> <p>Relatively young population combined with a growing population of older age groups. 2018 – 2030 sees a projected 4% decrease in the 0-19 age group, while over 65s increase by 26%.</p>	 Age	<p>Edgware: 23% under 15 17% 15-29 42% 30-59 18% over 60</p> <p>Canons: 20% under 15 15% 15-29 39% 30-59 25% over 60</p>
<p>40% of the population made up of Black, Asian and minority groups</p> <p>39% of school children speak non-English first language at home, the most common being Persian-Farsi, Somali and Romanian.</p>	 Diversity	<p>Edgware 65%, Canons 48% of the population made up of Black, Asian and minority groups</p> <p>In Edgware ward a particularly high proportion of Indian ethnic groups. 65% of pupils do not speak English as a first language at home.³</p>
<p>33% Jewish 28% Christian 11% Muslim 9% Hindu 19% other/ no religion</p>	 Religion	<p>Edgware Ward: 37% Christian, 30% Hindu, 16% Muslim, 17% other / no religion</p> <p>Canons Ward: 26% Christian, 25% Jewish, 18% Hindu, 11% Muslim, 20% other/ no religion</p>
<p>36% Level 4 qualification or above</p> <p>Lower than Barnet (52%) and London (53%) averages</p> <p>17% of working age have no qualifications, lower than Barnet (6.2%) and London (6.6%) averages</p>	 Qualifications and Job Type	<p>32% Level 4 qualification or above in Edgware Ward</p> <p>Lower than London (53%) average</p> <p>17% of working age have no qualifications, lower the London (6.6%) average</p>
<p>7.9% (2011) (London average 8.8%, national average 7.6%)</p> <p>2.6% on Jobseeker's Allowance – below borough and national averages</p>	 Unemployment	<p>8.8% (2011) Edgware Ward (London average 8.8%, national average 7.6%)</p> <p>Both wards 1.1% on Jobseeker's Allowance – below borough and national averages</p>

³ Harrow Vitality Profiles 2018-2019 Education

BARNET - EDGWARE WARD		HARROW - EDGWARE AND CANONS WARDS
<p>Life expectancy at birth:</p> <ul style="list-style-type: none"> - Female 87.1 years; higher than the borough average of 85.5 years and London average of 84.3 years - Male 84 years; higher than the borough average of 82.2 years and London average life of 80.5 years <p>60% proportion of Barnet adults physically active in 2016/ 17 -below London average 65%, national 66%</p> <p>56% Barnet adults overweight or obese; similar to London average (55.2%) but lower than national average (61.3%)</p>	 <p>Health</p>	<p>Life expectancy at birth Edgware Ward:</p> <ul style="list-style-type: none"> - Female 86.6 years; higher than the borough average of 85.7 years and London average of 84.3 years - Male 82.3 years; higher than the borough average of 82.1 years and London average life of 80.5 years <p>55% proportion of Harrow adults physically active in 2016/ 17 - below London average 65%, national 66%</p> <p>55% Harrow adults overweight or obese; similar to London average (55.2%) but lower than national average (61.3%)</p>
<p>Ward average house price rose 208% from £175,000 in 2001 to £540,000 in 2018</p> <p>Monthly median rent of 2-bed flat in Barnet was £1,350 in 2017, compared to average outer London £1,295 and England £675</p> <p>60% of homes owner-occupied in 2011, above the Barnet average of 58%; 16% socially rented and 21% private rented</p>	 <p>Housing</p>	<p>Median house prices £380,000 to £483,000, Edgware Ward is among the less expensive areas of Harrow</p> <p>House prices rose fivefold 1997 to 2007.</p> <p>Harrow is the 18th most expensive borough out of 326 in England in terms of median house prices, and is above the London average</p>
<p>Edgware above Barnet average in most categories.</p> <p>LSOA indices of deprivation highlights pockets of deprivation that score highly in the crime domain with some LSOAs falling within the 10% most deprived.</p>	 <p>Crime</p>	<p>Th SPD area has relatively high levels of burglary and anti-social behaviour.</p>

- 3.2. The data shows Edgware to have a rising population which is culturally and ethnically diverse. In terms of age profile there is a relatively large younger population combining with a growing proportion of older people. House prices are high and have become less affordable in recent years.
- 3.3. While life expectancy is relatively high there is a need to encourage more physical activity.



Figure 8 – Traditional shopping frontage on Station Road

Town Centre Uses

3.4. Edgware Town Centre is primarily a retail centre and has approximately 300 units of retail and non-retail uses. Land use surveys were carried out in 2020, 2016 and 2013, allowing comparisons over time, along with comparisons to the national average based on Goad data.

TYPE OF UNIT	2020 NO. OF UNITS	2020 PROPORTION OF UNITS	2016 PROPORTION OF UNITS	2013 PROPORTION OF UNITS	UK AVERAGE 2015
Retail – Convenience⁵	36	12%	15%	13%	8%
Retail – Comparison⁶	78	26%	26%	33%	36%
Retail Services	48	16%	17%	12%	12%
Financial & professional services	34	11%	11%	12%	12%
Restaurants & cafes	34	11%	15%	15%	9%
Pubs & bars	4	1%	0%	1%	5%
Fast Food Takeaways	18	6%	4%	4%	6%
Sui Generis	16	5%	5%	5%	-
Other	12	4%	3%	3%	-
Vacant	19	6%	5%	3%	12%
Total	299	-	-	-	-

⁵ Convenience retailing refers to shopping for everyday essential items like food, drink, newspapers and confectionery

⁶ Comparison goods are bought relatively infrequently, so consumers usually evaluate prices, features and quality before making a purchase, e.g. clothes, electrical items, household and leisure goods

- 3.5. Convenience retailing⁵ is well represented in Edgware and is located throughout the town centre. There are several national chains including a large Sainsburys (located within the Broadwalk Shopping Centre), Tesco Express, Lidl and Iceland. However, the majority of convenience outlets are smaller and independent, with numerous stores providing specialist foodstuffs to cater for a range of diverse cultural needs, for example the two independent butchers which provide halal and kosher meat.
- 3.6. While over a quarter of the retail outlets in 2020 were comparison goods shops, this is a significant decline from the 33% level in 2013, and significantly below the national average. Some national chains, which are concentrated in the Broadwalk Centre, have closed. This is reflected in a shift in the make-up of the comparison sector, and in its place a growth of charity and second-hand shops that is driven in part by a high concentration of second-hand phone shops/repair shops, along with a growth in discount stores.
- 3.7. Edgware possess a numerous and diverse range of restaurants and cafés across the town centre, and this reflects diversity in offer but also the communities that the centre serves and attracts. While there is a presence of national chains, most are small, independent outlets. The proportion of hot food takeaways has increased in recent years. Drinking establishments in the form of pubs and bars are underrepresented within Edgware, occupying only 1% of the units versus 5% nationwide.
- 3.8. The town centre has a range of local service uses, including estate agents, hairdressers, beauty salons and opticians. Unlike many town centres, Edgware has successfully managed to retain banks, along with a good representation of other financial services that provides a strong market indicator for future investment potential.
- 3.9. The number of units in the sui generis category has increased, driven partly by the higher number of nail bars and tanning studios, along with an increase in betting shops and pay day loan brokers.
- 3.10. Vacancy rates have increased significantly in recent years to 6% of all units, matching the London-wide position, but below the national average of 12%. There is a significant amount of non-retail uses within Edgware Town Centre, with extensive office space providing opportunities for professional services and business to locate there. Leisure uses are present, for example a fitness gym is located on Station Road. Diverse community uses such as community organisations, education, healthcare, religious uses, and a library, all add to the range of activities which jointly underpin the functioning and attraction of the town centre.

3.11. *The Edgware Town Centre Economic Strategy* notes a clear shift away from retailing being the dominant element of town centres. A combination of changing consumer habits with increasing on-line rather than physical in-centre shopping, national multiple retailer casualties, and increased experiential expectations combining leisure, socialising and shopping has led to wide recognition that the role of town centres is changing and the diversification of uses within town centres is needed to support their long-term vitality and viability.

Changes to the Use Class Order

- 3.12. The planning system categorises land uses into classes, meaning that planning permission must be obtained from planning authorities for certain changes in use at a property.
- 3.13. In summer 2020 the Government introduced major changes to use classes that allow far greater flexibility to change uses within town centres without need to obtain planning permission.
- 3.14. A single use class (E) amalgamates retail uses , professional services, and cafes and restaurants, along with offices and some light industrial uses and gyms, child care and health centre. Bars and pubs and take-aways are now in their own category, known as *Sui generis*.

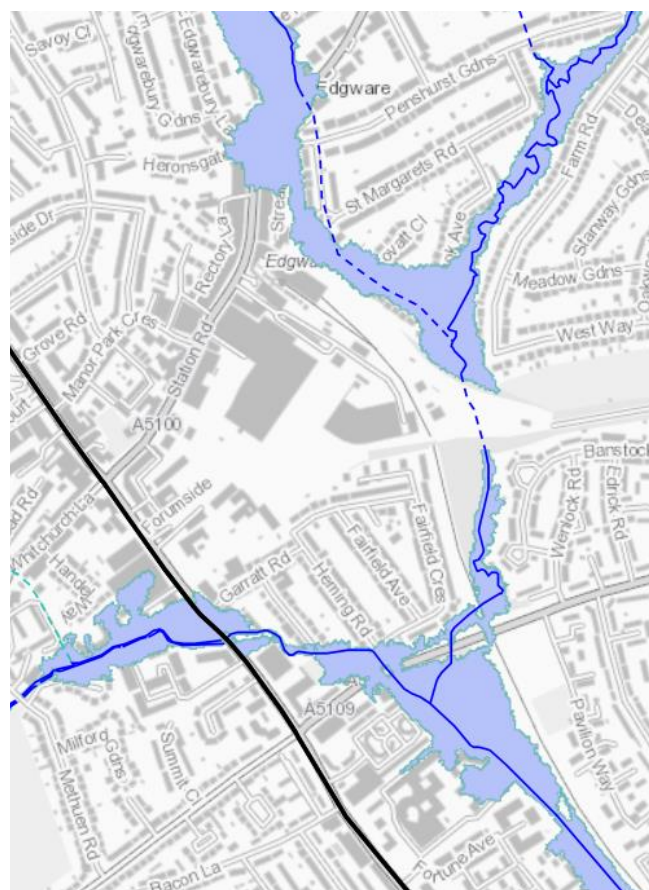


Figure 9 – Areas at flood risk (1 in 100 years)

3.15. The Government seeks to increase market agility and bring greater flexibility to town centres, an approach that aligns with Edgware’s need to focus on providing a broader town centre experience and attractive environment that draws visitors both locally and from the wider region. At the same time the changes have affected the councils’ ability to manage town centre use types.

Environmental Profile

Waterways and Flood Risk

3.16. Two waterways flow through the area - Dean’s Brook and Edgware Brook – leading to some areas lying in Flood Risk Zone 3 (1 in 100 year or greater risk of flooding). There is also a surface water flood risk in some parts of the town centre.

Open Spaces and Green Areas

3.17. Edgware Town Centre lacks a network of open space and where there are open spaces in the wider area, access and routes to these spaces are not clear or well signed. Part of the SPD area is identified as being deficient in public open space, defined as being more than 400m from a local park or 1.2km from a district park.

3.18. Along the Deans Brook corridor and to the south and east of the Underground sidings is an area classified as a Site of Borough Importance for Nature Conservation. There are other wildlife sites in the local area, including Silk Stream, Burnt Oak Brook, Stoneyfields Park and Mill Hill Old Railway Nature Reserve, which have the potential to be better linked to the SPD area.

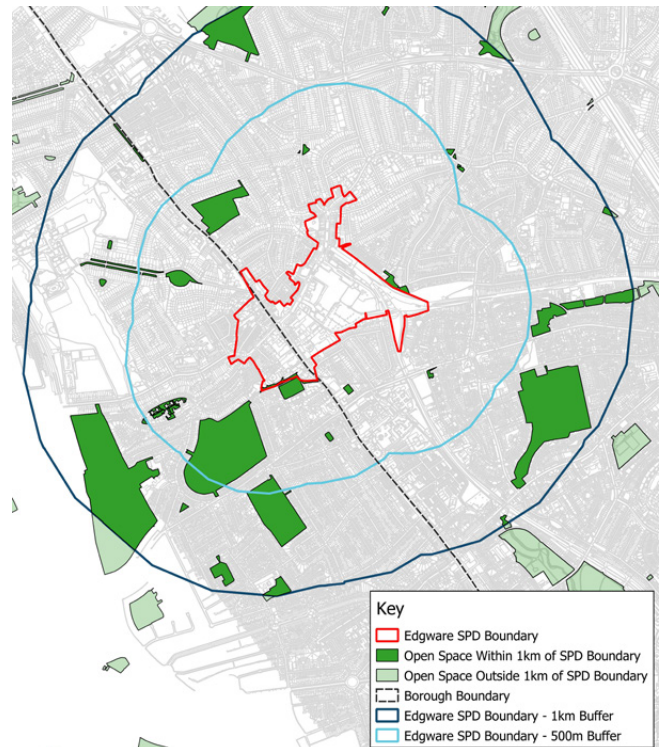


Figure 10 – Public open spaces around the SPD area

Environmental resilience

3.19. Heavy traffic along the major thoroughfares of the A5 and Station Road lead to concentrations of air pollution along these routes, with Nitrogen dioxide (NO2) levels exceeding the annual mean concentration requirement of 40 µg/m³ in some instances. Other measured pollutants of PM10 and PM2.5 are not exceeded.

3.20. Noise pollution, which varies significantly according to the time of day, is again concentrated along the major road roads, as well as the bus station, car park and school. There is a need to promote healthy streets, reducing the dominance of vehicular traffic and better support walking and cycling to create a cleaner, greener and healthier town centre.

3.21. The impact of climate change is expected to increase the likelihood of extreme weather events that pose a risk to health, including summer heatwaves, flooding, and drought. Measures to tackling climate change are vital to the renewal of Edgware Town Centre.

Fly Tipping

3.22. Fly tipping is an environment hazard in several parts of the town centre, in particular the Forumside area to the rear of the Railway Hotel. The footpaths and alleyways are also affected by this problem, including Church Way around the perimeter of the Broadwalk Centre car park. Generally high levels of litter along the streets and over-filled bins are also a problem.

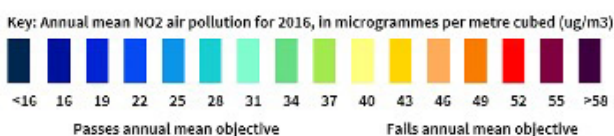
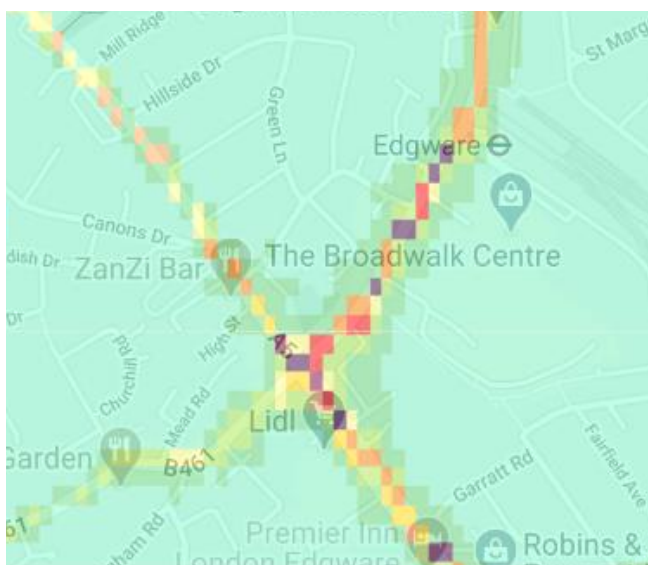


Figure 11 – Pollution from nitrogen dioxide (NO2)



Figure 12 – Station Road in the mid-20th Century

Historic Character

- 3.23. Edgware has a long history of change and development, evidence of which can be seen today in the buildings and infrastructure.
- 3.24. The ancient Roman road (later known as Watling Street) ran through the area and provides the basis for the modern-day strategic A5/ High Street route.
- 3.25. Edgware has been long established as a settlement, with the Medieval Parish Church of St Margaret the oldest remaining building. Along the High Street numerous historic buildings demonstrate the long-standing importance of Edgware as a place to live and work, as well as its position on a major transport route.
- 3.26. While the Great Northern Railway branch opened in 1867, Edgware remained largely rural and agricultural until the early twentieth century by when manufacturing industry established a presence, with suburban development increasing in the southern areas.
- 3.27. The London Underground network arrived with the opening of Edgware Station on the Northern Line in 1924. By this time the area was rapidly suburbanising and the population increasing. To meet emerging needs, the shopping district around Station Road was developed in the late 1920s and early 30s.
- 3.28. There were major changes during the post-World War Two period, including the demolition of the over-ground railway station. In the 1960s the tall, modernist style office block Premier House was constructed and in 1990 the Broadwalk Shopping Centre was built. The Ritz Cinema, which opened in 1932 and stood on the north side of Station Road, was demolished in 2001 and replaced with a building containing a gym, apartments and retail units.

Heritage

- 3.29. Edgware has many heritage assets, and while some are well-used and in a good state of repair, other are in a poor condition or even derelict. Heritage assets have an important part to play in the growth and renewal of Edgware, providing historical context and supporting local identity. Due to its long history there may also be archaeological remains in Edgware, as reflected in the presence of Archaeological Priority Areas.



Figure 13 – The Masons Arms - a listed heritage building in poor condition

	NATIONALLY LISTED	LOCALLY LISTED	CONSERVATION AREA
Barnet	<ul style="list-style-type: none"> Railway Hotel Including Sign in Front and Former Off-Sales Building to West Parish Church of St Margaret (Grade II) 	<ul style="list-style-type: none"> St. Margaret's Church Hall Kings Parade, Nos. 1 - 23 (Odd) Edgwarebury Lane NatWest Bank, No. 317 Hale Lane Edgware Underground Station, Station Road 	<ul style="list-style-type: none"> Watling Estate (outside the SPD boundary)
Harrow	<ul style="list-style-type: none"> (All Grade II) The White Hart Hotel 65-67, High Street (Grade II) 85-89, High Street 95, High Street 97, High Street 99-101 High Street War Memorial Pair of Telephone Kiosks, The Bee Hive Gate posts at Canons Drive entrance (outside the SPD boundary) Canons Park Registered Park and Garden (outside the SPD boundary) 	<ul style="list-style-type: none"> Police Station, Whitchurch Lane 81 High Street 083A High Street 	<ul style="list-style-type: none"> Edgware High Street Conservation Area Canons Park (outside the SPD boundary)

3.30. The Hale Lane and Watling Street Archaeological Priority Areas (APAs) are within Edgware Town Centre, along with Edgware Village APA in Harrow.

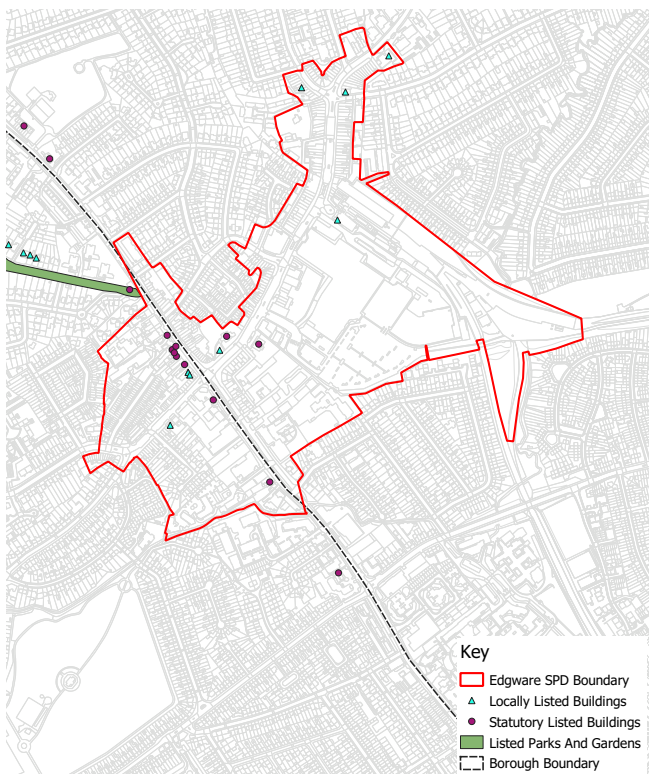


Figure 14 – Listed heritage assets

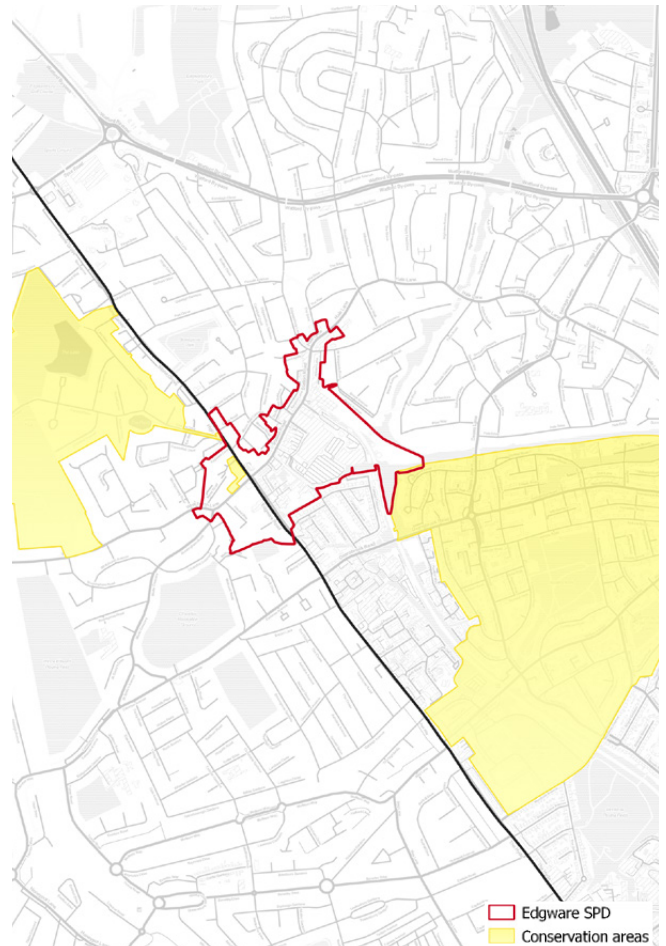


Figure 15 – Conservation areas

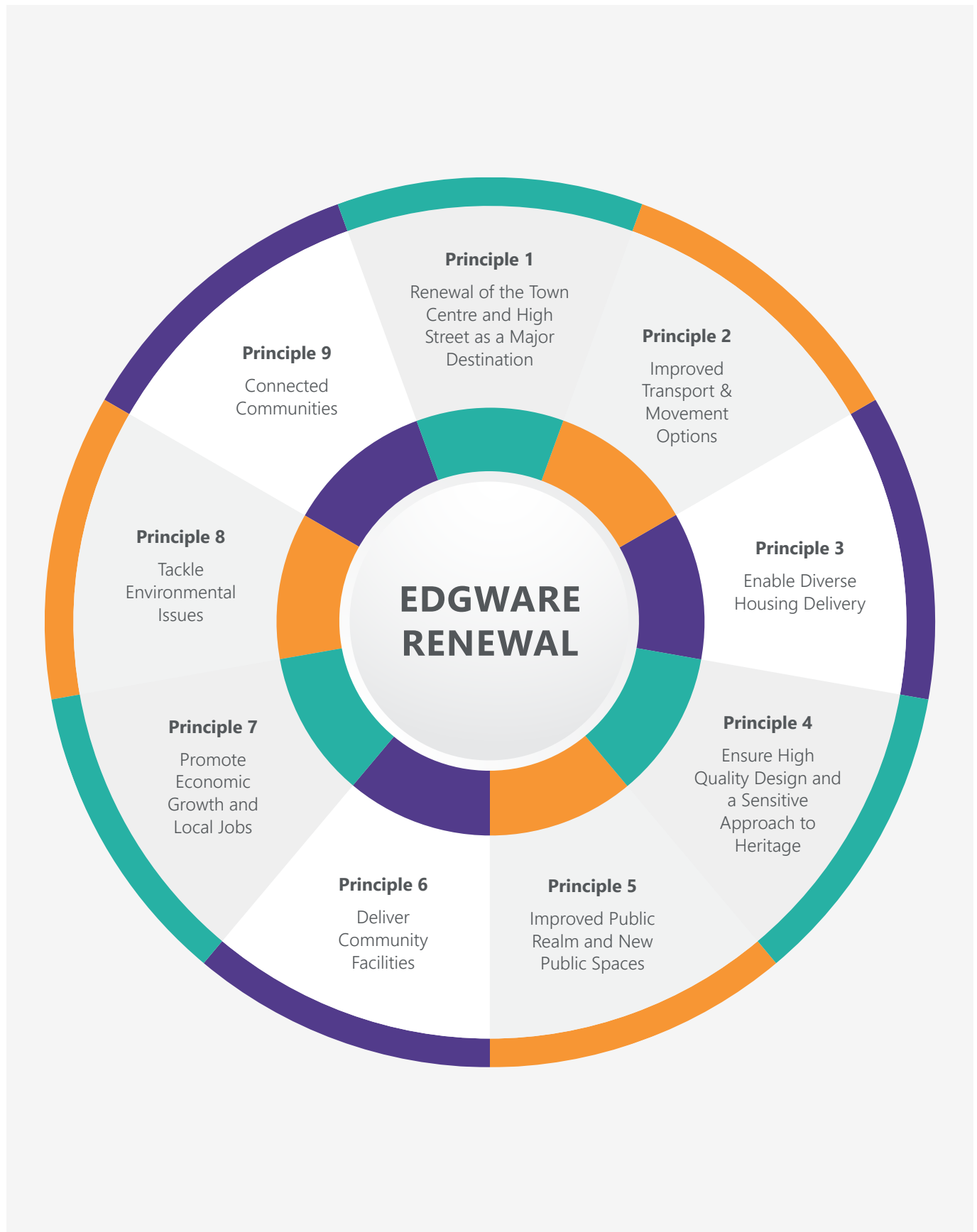


4.

Development Principles

4. Development Principles

- 4.1. To achieve the SPD objectives a set of principles will guide sustainable development to meet the needs of Edgware. The principles are inter-locking with each one supporting the others to bring forward the renewal of the town centre.



Principle 1 -

Renewal of the Town Centre and High Street as a Major Destination

- 4.2. Edgware is Barnet's only major town centre and is also an important destination for residents in Harrow and further afield. The centre has 300 retail outlets which provide a broad range of shops, services and eating out opportunities, as detailed in Chapter 3. National chains are concentrated in the Broadwalk Centre and the central section of Station Road. Independent businesses are spread throughout the town centre and offer a culturally diverse range of outlets. In some cases, units around the edge of the town centre are not in a good condition and improvement should be sought.
- 4.3. Traditional high street uses, including retail, have in many cases been negatively affected by the Covid-19 crisis. The 2020 amendments to the Use Class Order detailed in Chapter 3 also limit the ability of the councils to control and maintain such uses. However, this also provides an opportunity for new active ground floor uses to emerge and a diversity of new entrepreneurial sectors to flourish.
- 4.4. The *Edgware Town Centre Economic Strategy* notes that the role of the high street is changing and a more diverse mixed-use environment is required where retail will continue to be important but leisure, education, community and commercial/office uses are as important for creating and maintaining vital, viable and sustainable town centres.
- 4.5. There is a need to renew and broaden the offer provided by Edgware Town Centre to one which is clear, distinctive and diversified, with the aim of both retaining spending from the local population and drawing in new custom from a wider area. Younger people should be attracted to Edgware through improving its offer in comparison to other nearby town centres and through providing positive and safe places for young people to engage and meet each other. The increase in footfall and new opportunities will benefit Edgware's existing businesses and retailers.
- 4.6. To ensure its future success as a town centre Edgware must:
- Retain and enhance its Major Town Centre status by continuing to provide a quantum of uses that draws in people for a high quality and diverse town centre experience. The main town centre offer should be focused on Station Road to maintain this as the main shopping thoroughfare. Flexible floorspace options should be sought that enables a range of operators to support Edgware as a major destination experience. Ground floor frontages must be active, contributing to a lively, attractive and safe street environment.
 - Address those retail units around the edge of the town centre which are in poor condition through encouraging improved frontages;
 - Provide a significant new cultural and leisure offering with attractions that make Edgware a destination location during both the daytime and evening. Potential options include a new cinema, swimming pool and a diverse range of eating-out options that reflect the multiple and distinctive cultures that thrive around Edgware. Other uses will be considered where they support the creation of a town centre fit for the future, providing a suitable variety of uses and able to adapt to future challenges. Activities, exhibitions and performances by local community and artistic groups should be encouraged to bring people together and foster a sense of pride and inclusion.
 - Retain local town centre users while seeking to draw in visitors from a wide area of North London and South Hertfordshire.
 - Use the town centre renewal as an opportunity to engage local businesses to work together with the two local authorities, Transport for London and development partners to support local identity and deliver public realm and other improvements with the objective of improving the local economy.



Figure 16 – A diversity of shops

Principle 2

Improved Transport and Movement Options

- 4.7. Edgware benefits from the major public transport hubs of Edgware Underground Station and Edgware Bus Station. The town centre does, however, experience high levels of road congestion and consequently a poor environment for pedestrians and cyclists. There is a need to improve connections with the surrounding residential areas, and between the Barnet and Harrow parts of the town centre.
- 4.8. Pedestrian activity is concentrated along the major roads, particularly around the tube station and the shopping centre. While there are pedestrian links to residential areas to the south and east these are often narrow and poorly lit, and the tube lines create a major barrier to east-west movement. There is a need to move towards a far more active/ pedestrian-friendly town centre.
- 4.9. Road crossings for pedestrians should be reviewed and improved, including the potential for new crossing points, to provide a better and safer experience. This is particularly needed across the High Street/ A5 to connect the Harrow and Barnet parts of the town centre, along Station Road, and at the eastern end on Hale Lane and Edgwarebury Lane.



Figure 18 – There is good provision of bus stops within Edgware Town Centre



Figure 17 – Illustrative example of a dedicated cycle lane

- 4.10. There is huge potential to improve cycling infrastructure in Edgware and to significantly increase the number of journeys made by bicycle. TfL analysis indicates that Barnet has the highest number of trips currently driven which could be converted to walking or cycling - two thirds of car trips in Barnet are under 5km. Existing cycle lane and other infrastructure provision is limited and levels of cycling are low. Securing investment in new cycle routes across and between town centres in both boroughs is a Covid-19 recovery priority. There is potential for linkage to the emerging Barnet Loop cycling proposals.
- 4.11. Bus services are frequent and Edgware bus station is the main bus hub for the area, although the quality of public realm around the station and the interchange experience with the rail station could be improved. Nearly the whole SPD area is within 400m walk of a bus stop. Forecasts indicate a substantial increase in bus use in the area, with a need for improved bus services within Edgware, and better orbital connectivity, as set out in Barnet's Long Term Transport Strategy (LTTTS).
- 4.12. Edgware tube station operates as an integrated interchange with the adjacent bus station. Whilst busy, the station is observed to operate within capacity, although growth within Edgware is expected to significantly increase usage over time. To the front of the station is an arrival area which prioritises vehicles.
- 4.13. Off street car parking is provided to the rear of the Broadwalk Centre where there are 1,150 short-stay and long-stay spaces on an expansive, surface

level car park. The long-stay commuter off-street parking is used to capacity while the short-stay shopper parking is typically 60% full on a weekday. On-street parking is covered by several Controlled Parking Zones (CPZs).

- 4.14. The policy context includes the London Plan and Mayor’s Transport Strategy which support Good Growth principles and the Healthy Streets Approach, encouraging mode shift from private car to active travel, public transport and sustainable freight.
- 4.15. To meet the town centre’s transport and movement needs development should:
- Maximise the advantages of the town centre’s public transport facilities and services to develop excellent sustainable travel modes and optimise the development potential of the town centre;
 - Significantly improve the provision and support for active travel (walking and cycling) and public transport; combined with effective management of car parking supply and car usage to achieve high levels of growth; and
 - Use inclusive design to create a place that is inclusive and accessible and can be enjoyed by everyone including people with disabilities, older people, and carers with young children.
- 4.16. The interchange between Edgware’s bus and underground stations is and will remain important. The guiding principle is to improve passenger experience by finding the balance between space, legibility/ visibility and proximity between modes.
- 4.17. Further detail on transport and movement requirements, including on the bus station, are set out in the Transport and Movement Guide in Chapter 7 of this document.



Figure 19 – Edgware Station and forecourt

Principle 3 Enable Diverse Housing Delivery

- 4.18. Barnet and Harrow councils need to deliver new homes at the borough and local level to meet local need but also to meet London Plan requirements. Barnet is seeking to deliver several new residential development opportunities, which are identified at the Broadwalk Centre, TfL land, and Forumside areas. Encouraging more people to live in and around the town centre boundary and connecting in with surrounding residential neighbourhoods is fundamental to ensuring the town centre becomes a more successful place.
- 4.19. House prices and rental levels have risen enormously relative to income in recent years, leading to declining housing affordability levels for many people. More housing is needed to provide for those who cannot afford, or struggle to afford, a place to live.
- 4.20. It is also the case, as noted by the Edgware Town Centre Economic Strategy, that residential development, by increasing the population, is becoming an ever-more critical component to drive both footfall and spend in town centres.
- 4.21. To meet the housing needs development at Edgware will:
- Encourage residential development - the core of the centre could accommodate a substantial number of new market and affordable homes (subject to planning permission).
 - Provide for a mix of unit sizes and tenures, including affordable housing, in line with Local Plan policies. The varied requirements of both individuals and families should be accommodated where these are appropriate to create a varied and sustainable community.
 - Optimise sites to provide high quality housing in suitable locations.
 - Barnet’s emerging new Local Plan will establish a future housing capacity for the town centre.



Figure 20 – Extensive car parking to the rear of the Broadwalk Centre



Figure 21 – Listed heritage buildings on the A5/ High Street

Principle 4

Ensure High Quality Design and a Sensitive Approach to Heritage

- 4.22. Good design is crucial to the successful renewal of Edgware and ensuring that the development of buildings, streetscapes and the public realm support the needs of residents, workers and visitors. This is very much aligned with the Government's *White Paper Planning for the Future* which has a strong focus on the need for good design to build high quality homes and places.
- 4.23. Edgware already has many excellent design aspects, including for example the inter-war shopping frontages to the eastern end of Station Road. There are numerous listed heritage assets across the town centre, with a concentration on the eastern side of the A5, and at the western end of Station Road. Some heritage assets are well maintained and used. Others are not, in particular the privately owned Railway Hotel which is derelict and in poor condition but remains highly valued by the local community. Redevelopment proposals must carefully consider the setting and context of heritage assets, and proposals within an Archaeological Priority Area should be supported by an archaeological desk-based assessment.
- 4.24. In parts of the town centre there is a very low intensity of land use, with extensive areas of brownfield land, surface car parking, and single storey buildings. The high level of public transport accessibility and town centre location support the greater optimisation of land and development opportunity, in line with national and London planning policy. Edgware Town Centre within Barnet is identified by Barnet's Local Plan as a tall buildings location, meaning there is potential for buildings higher than eight storeys, and for very tall buildings of over 14 storeys, subject to exceptional design quality and demonstrating that the scheme meets criteria such as integrating with the existing urban fabric, and ensuring no adverse microclimate impact relating to wind or daylight.



Figure 22 – St Margaret's Churchyard provides a quiet, green and attractive space

4.25. Good design contributes to a healthy and secure community. Outdoor spaces, natural greenery, and high-quality architecture all add to peoples' health and wellbeing. Active lifestyles should be built into Edgware Town Centre, and proposals should show how they have referenced the principles of Active Design and undertaken the Active Design Checklist⁷. In terms of security, research shows that taking a 'Secured by Design' approach leads to less burglary, criminal damage and anti-social behaviour. Secured by Design Principles should be used for all new buildings and public realm improvements, including:

- Appropriate lighting
- Encouraging natural activity
- Providing natural surveillance
- Reduce opportunities for concealment
- Appropriate placement of public realm seating
- Managing the permeability of the area to ensure safety of pedestrians and cyclists.

4.26. All developments should work with Secured by Design Officers at the earliest opportunity and seek to receive a Secured by Design Award.

4.27. Projects to design out crime in the existing public realm should be identified, including the walkways that lead into the Edgware SPD area from the surrounding residential areas.

4.28. To ensure growth meets the needs of Edgware Town Centre developments must:

- Deliver high quality design and ensure that new development meets the challenge of its locational context within Edgware's varied town centre.
- Show excellent design for any proposal involving tall buildings and demonstrate an appropriate relationship with other town centre buildings, particularly Edgware's heritage assets, and the surrounding low-rise residential suburbs.

- Celebrate local heritage, ensuring that historical assets can fulfil a town centre function, while considering the context and setting in any development proposal. The Railway Hotel particularly is a valued landmark heritage building that must be brought back into use as part of the renewal and redevelopment of the wider area.
- Consider the potential for archaeological remains. Archaeology can be used to enhance the experience of the area by telling the story of the area's heritage through sympathetic and imaginative public realm design.
- Use land efficiently through comprehensive regeneration of key sites that optimises density and meets the growth needs of the boroughs.
- Use a 'Secured by Design' approach that helps people to feel safe by designing out crime and anti-social behaviour, for example by natural surveillance in new developments.
- Design in health and wellbeing through a holistic approach that supports physical and mental wellbeing. Space for outdoor recreation is a vital resource, something demonstrated during the Coronavirus pandemic where people needed access to convenient local places for exercise while social distancing. Proposals should reference Active Design Principles and show how they have met the Active Design Checklist.
- Design to meet the amenity needs of a diverse and family-friendly community.
- Proposals should demonstrate a positive impact on health and wellbeing in line with Public Health England's guidance document, "Improving health through the home: A checklist for local plans and policies."
- Construction activity must be planned appropriately to mitigate impact on existing business and residents.

⁷ www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/

Principle 5

Improved Environment and New Public Spaces

4.29. Edgware Town Centre lacks public open spaces, and those spaces which are nearby are not always well signposted. This means town centre residents and visitors do not have ready access to space for recreation and relaxation. There is a missed opportunity for attractive public realm features which provide a sense of space and identity within the town centre.

4.30. Furthermore, in many instances the environment and public realm is in a poor condition. Street furniture is cluttered and sometimes broken. Shopping frontages in some cases could be better maintained and signage can be excessive, with letting agency signs proliferating.

4.31. While Edgware has numerous footpaths and alleyways linking the town centre to residential areas, these are often narrow and isolating, and lack a sense of safety. This is exacerbated by frequent littering and fly tipping.

4.32. To achieve a renewed town centre and deliver many new homes Edgware must provide a high-quality environment which includes:

- The delivery of several public open spaces which provide sufficient areas for residents and town centre visitors to use for recreation, play and relaxation. This opportunity for new spaces should be used to promote a sense of local identity and pride, potentially drawing on local

history and culture. The spaces could be a focus for local community activities and festivals that bring people together and foster a sense of pride and inclusion. These open spaces should be easily accessible and interlinked for pedestrian and cycle-only use, with design that promotes public safety. There should be extensive planting to provide a sense of greenery and nature, while taking opportunities to deliver environmental benefits such as attracting wildlife, natural SUDS, and carbon capture. Provision must be made for children's play space.

- Main and side streets which provide a well-designed and clean environment that is attractive for pedestrians and cyclists. This is likely to include reducing the sense of clutter and providing consistent, well-designed street furniture. There is potential to work with property owners and businesses to improve the street scene through improving shop frontages and removing or reducing letting agency signage.
- The numerous alleyways and footpaths which provide direct linkage between residential areas and the town centre must be transformed to provide pleasant clean and safe environments. This may include opening up the available space, better signage and access points, improved boundary and surface treatment, and higher levels of maintenance. The potential for joint use as cycle paths should be fully explored.
- Ensure plans are in place for the long-term maintenance of the public and open spaces with the Edgware SPD area.



Figure 23 – Green space with a playground close to Edgware Town Centre

- 4.33. These changes will also support health and wellbeing of the population through providing more opportunities for physical exercise, socialising and relaxation. Improved routes for pedestrians and cyclists will encourage more active travel, further improving health through exercise and tackling air pollution from vehicles.
- 4.34. There is an opportunity to explore whether development could contribute to a fund for improvements to the shopping frontages and improved wayfinding, for example through better signage.
- 4.35. A better environment will help to achieve a diverse and family-friendly community where people want to spend time within Edgware. It should also reduce instances of crime and fear of crime through providing a place which people can feel a sense of security and pride.

Principle 6 Deliver Community Facilities

- 4.36. Community infrastructure serves the needs of the local population, providing key facilities for education, health, and locations for community organisations and activities. The renewal of the town centre should support and, where necessary, improve community facilities.
- 4.37. Edgware is served by a range of community infrastructure, both within the town centre and in the surrounding area. There is a particular concentration of community buildings on Rectory Lane where they are, however, somewhat hidden away and on a narrow, poor-quality road. Community infrastructure and organisations need to be nurtured and potentially helped to expand to support growth.
- 4.38. Edgware library is located on Hale Lane, within the town centre, and includes community meeting space for hire. Edgware Primary School is part of the town centre; other schools are located nearby, including the Beit Shvidler Primary School. Religious institutions are well represented in or close to Edgware Town Centre, including churches, mosques and synagogues.
- 4.39. The Use Class Order as amended in 2020 (set out in Chapter 3) includes community uses such as health centres, childcare and gyms in the same E use class as shops and cafes, potentially enabling more fluidity between these uses within Edgware Town Centre.
- 4.40. An important consideration for many town centre users is the provision of publicly available toilets, potentially through specific facilities or a 'community toilets' scheme.

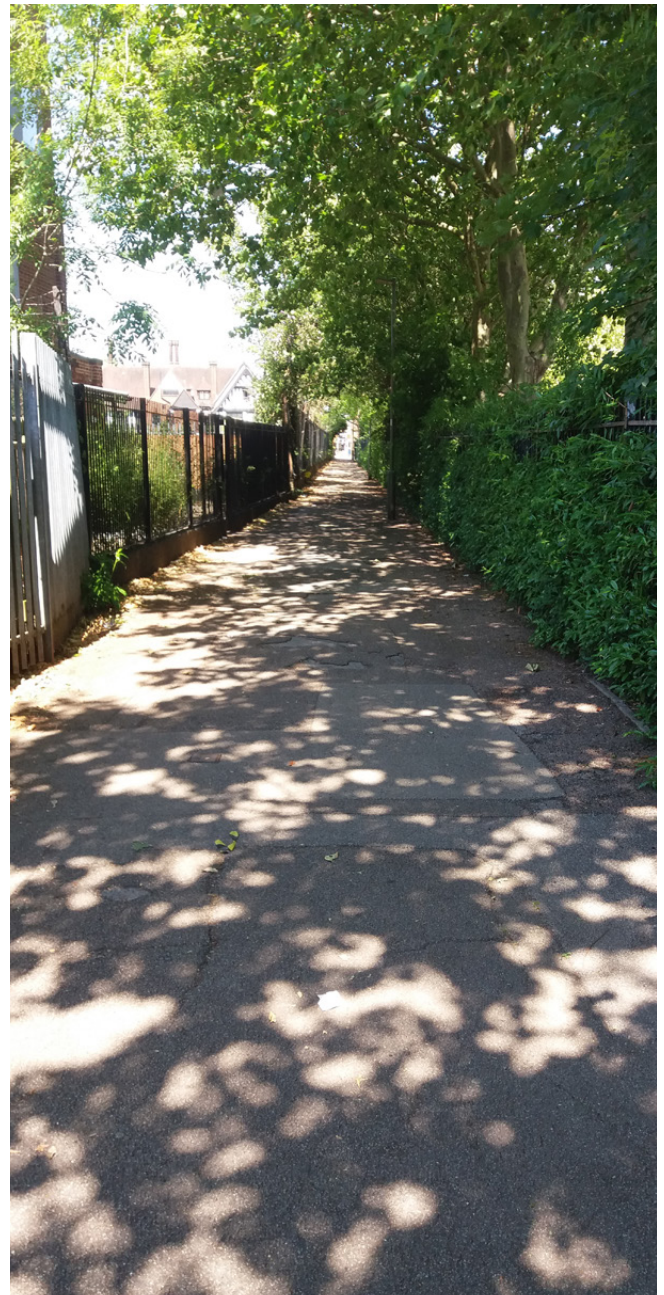


Figure 24 – Church Way is green and traffic-free but can feel isolating and unsafe

- 4.41. For the appropriate provision of community infrastructure in Edgware:
- The need for community facilities must be assessed to ensure provision of sufficient, suitable space for uses including education, health and community groups, with a likely increase required to support redevelopment of the town centre.
 - Seek opportunities for relocation to better serve the community and offer more appropriate accommodation.
 - Consider the need and provision for indoor and outdoor sports facilities.
 - Ensure the community facilities support the needs, health and wellbeing of Edgware's diverse community.

Principle 7

Promote Economic Growth and Local Jobs

- 4.42. Providing economic resilience as part of a Covid recovery programme and growing Edgware's economy and increasing the number of jobs available for local people is a vital element in the renewal of the town centre.
- 4.43. Opportunities should be sought for new business in emerging growth sectors, for example digital, creative industries, and ICT.
- 4.44. Economic dynamism and the retention of more local spending within Edgware will help to boost the town centre and support a sustainable, thriving community. More employment opportunities in the local area will mean fewer people travelling out to places of work, reducing pressure on the transport network, particularly at peak hours.
- 4.45. Much of Edgware's existing economic activity and jobs is based on the town centre uses which will be enormously supported by the renewal of town centre activities and a transformational improvement of the cultural and leisure offer which increases footfall and provides new opportunities.
- 4.46. Affordable office premises within the town centre are mostly located along the A5/ High Street corridor, including Grosvenor House, along with a number of storage units and small industrial units. Office and light industrial units provide an important economic function and floorspace for these uses should be retained or re-provided.

- 4.47. It should be noted that the Use Class Order as amended in 2020 (set out in Chapter 3) includes office and light industrial units in the same use class as high street uses such as retail and cafes, along with some community uses such as gyms and childcare, potentially meaning the councils may need to take a broad approach to increasing economic growth and job opportunities.
- 4.48. While evidence suggests that unemployment levels in Edgware have been relatively low in recent years, the long-term impact of the Coronavirus pandemic is yet to be fully assessed. The long-standing need to increase the level of skills and training for some parts of the working age population is likely to be supplemented by a requirement to assist the workforce where jobs have been lost due to Coronavirus. Young people in particular need job opportunities, both for full time roles and part-time work that fits around studying commitments.
- 4.49. In terms of the economy and jobs Edgware has a need to:
- Encourage economic growth and generate inward investment.
 - Encourage the location of public sector service delivery hubs
 - Support growth in the evening economy, balanced with the need to avoid issues of anti-social behaviour.
 - Seek to retain and provide employment floorspace for businesses, including office and light industrial.
 - Support people who have lost jobs due to the Coronavirus pandemic through linkages to local work opportunities and skills training.
 - Ensure local employment opportunities, along with securing construction apprenticeships through development opportunities, to support rates of employment and allow more sustainable working patterns.
 - Where required, increase training for local people to help them secure jobs and increase the local skills base as a way of encouraging employers to locate in the area.
 - Be aware of the barriers to employment which some people may experience to securing employment and to help overcome those barriers. There may be opportunities for skills and training through working with developers on key regeneration sites in the town centre.



Figure 25 – A community organisation located on Rectory Lane



Figure 27 – A place for community meetings

Principle 8 Tackle Environmental Issues

4.50. The impact of climate change must be addressed, with growth in Edgware both seeking to mitigate and adapt to the effects of more extreme weather events. More energy efficient buildings, more sustainable transport, and the use and production of low or zero-carbon energy all have a role. Development should be in line with the Mayor of London's target for London to become a net zero-carbon city by 2050. Fluvial flood risk is concentrated along Deans Brook and Edgware Brook, while surface water flooding is a risk in some parts of the town centre. Different sources of flooding interact and can exacerbate flood risk, for example an increase of impermeable surfaces from development and a lack of capacity within the existing drainage network will further contribute to risk.

4.51. Air and noise pollution are problematic due to heavy traffic flow, notably along the Station Road and High Street corridors. This will affect the road users, including pedestrians, cyclists, and the vehicle users themselves. The pollution levels fall away from the road corridors relatively quickly, which should be taken into consideration when locating land uses, particularly residential. Over the medium to longer term a transition to more sustainable transport modes will help to reduce pollution, as will the expected rise of electric vehicles.

4.52. There are areas of biodiversity recognised in Edgware, for example through the Deans Brook corridor classified as a Site of Borough Importance for Nature Conservation, and nature sites in the wider area, such as the Mill Hill Old Railway Nature Reserve. Renewal in Edgware should seek ways to increase and enhance the biodiversity of the area and support wildlife to make it a home, including restoring the rivers and improving the river corridor habitat and

spaces for wildlife. This should be combined with enabling people to experience nature at first hand, seeking potential opportunities to open-up spaces such as the Deans Brook Corridor and Edgware Brook for public access, with the aim of connecting green spaces and habitats across the area where possible.

4.53. Environment issues in Edgware should be tackled by:

- New developments mitigating and adapting to climate change in line with the policy and regulatory framework.
- Applying the Sequential Test and Sequential approach to ensure sites within areas of lowest flood risk are prioritised ahead of selecting sites in areas of medium to high fluvial (and surface water) flood risk.
- Managing flood risk through the design and location of development and make use of sustainable urban drainage systems. Proposals should utilise the guidance within the existing SFRAs to design layouts, mitigate and make space for water to help with the reduction of flood risk. Planning contributions towards the new Silk Stream Flood Alleviation Scheme may be sought.
- Ensuring that air and noise pollution effects on residents, workers and visitors to the town centre are minimised.
- Protecting existing habitats and create new habitats that support biodiversity, taking a net gain approach through measures such as river restoration and planting. Green networks and linkages should be provided where possible, with an emphasis on encouraging people to experience nature within Edgware on a daily basis.
- Acknowledging that the local and wider environment is a vital element to supporting physical and mental health and wellbeing, and placing emphasis on measures that enhance and support the Urban Greening Factor as detailed in the London Plan.



Figure 26 – Healthcare facilities in Edgware Town Centre



Figure 28 – Dean’s Brook provides a nature conservation corridor through the area

Principle 9 Connected Communities

4.54. Renewal and redevelopment require the participation of local communities and stakeholders to achieve success. This SPD supports a cross-borough approach that enables effective, ongoing communication and engagement.

4.55. Early engagement on the SPD was undertaken through:

- A Barnet Local Plan presentation at St Margaret’s Church in March 2020;
- An online cross-borough Member workshop in May 2020 which sought the views of local Councillors in Barnet and Harrow;
- An online local stakeholder event in July 2020 which provided an update on the emerging SPD and sought the views of local businesses and community groups;
- A Designing Out Crime Visual Audit of Edgware Town Centre in September 2020, undertaken with the Metropolitan Police’s Designing out Crime team, along with Community Safety and Planning officers, to identify potential crime reduction recommendations relating to the built-environment which could help reduce crime and the fear of crime.

4.56. Key issues raised included crime and anti-social behaviour, heavy traffic congestion through the town centre, concerns about the state of retail on Station Road, poor public realm, and the lack

of open or public spaces. The feedback received helped to shape the draft plan.

4.57. The public consultation on the Draft SPD that ran for six weeks from 11th January to 22nd February 2021 included two online public consultation events that were attended by approximately 160 people. Consultation events focused on young people were held. Feedback was received from local residents and groups, as well as statutory stakeholders, which was used to inform the final version of the Edgware SPD.

4.58. To ensure connected communities are enabled for Edgware Town Centre the councils will:

- Seek ongoing engagement and consultation with local stakeholders.
- Develop effective partnerships with business, the education sector and other employers to meet the evolving skills and employment needs of the population post-Coronavirus.
- Work with communities and landlords to address blight caused by vacant high street properties.

This opportunity for new spaces should be used to promote a sense of local identity and pride

5.

Key Sites Design Guide

5. Key Sites Design Guide

- 5.1. This chapter seeks to provide a closer focus on key opportunity sites within the SPD area where there is greater development potential. How these key sites are developed in design terms is critical to the future success of the town centre. The Design Guide establishes broad parameters for development in terms of context, scale and massing, layout and movement.
- 5.2. The Design Guide is necessarily at a relatively high level, and it may be appropriate to prepare one or more design code(s) to provide more detailed guidance for sites or areas within Edgware SPD.
- 5.3. The NPPF sets out that:

'the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'

Design Vision

5.4. The Design Vision sets out the overall design approach across the Edgware SPD area.



Permeability: A successful urban space needs to be highly connected to surrounding environments, both visually and physically. A permeable public space is easy to get to and use. This is achieved through appropriate scale of development, clear views to and from the space, and a robust wayfinding approach.



Intuitive flows: Pedestrians and cyclists must be able to move around in an attractive environment, without interruptions, with minimised exposure to noise and air pollution and with clear and frequent views to destinations, while also meeting the requirements of vehicular traffic to move through and access the town centre.



Sociability: Successful public spaces have the potential to be vibrant and lively or peaceful and relaxed places to gather in and socialize. The space should provide interest from afar and up close whilst considering the human scale. A good mix of activities should be provided.



Mixed Use: There should be a mixed offer including retail, cultural, leisure and residential uses which complement each other on site and work well with the existing high street. The aim is to provide welcoming, pedestrian friendly town centre uses for Edgware.



Context: Context consists of a range of factors, such as building scale and massing, materials, land uses and design styles. Development should aim to complement and enhance the existing built environment.



Active Neighbourhoods: Cultural and leisure uses, shops, cafes, restaurants and community amenities can all add vibrancy to neighbourhood character. A pleasant public spaces for uses such as eating out enhance the space. A clustering of uses in a pleasant environment increases pedestrian movement which in turn supports a vibrant local economy.



Environmentally Responsive: Meet the environmental needs of Edgware to provide a healthy place for residents and visitors that offers access to nature and tackles climate change through measures such as urban greening and energy efficient designs.

Town Centre Urban Landscape

5.5. Edgware Town Centre is broadly characterised by three to four storey interwar brick built buildings typical of London suburbs. This pattern of development results in well-defined commercial streets with ground floor shops and frequent doorways providing access to the offices and residential flats on the floors above, with windows directly overlooking the street. This character is most evident along the length of Station Road northeast of the Tube station. This type of layout works well at creating a lively, varied and durable high street that is of a human scale, can accommodate a wide range of activities and adapts well to change.



Figure 29 – The urban grain varies across Edgware



Figure 30 – The inter-war frontages of north eastern Station Road

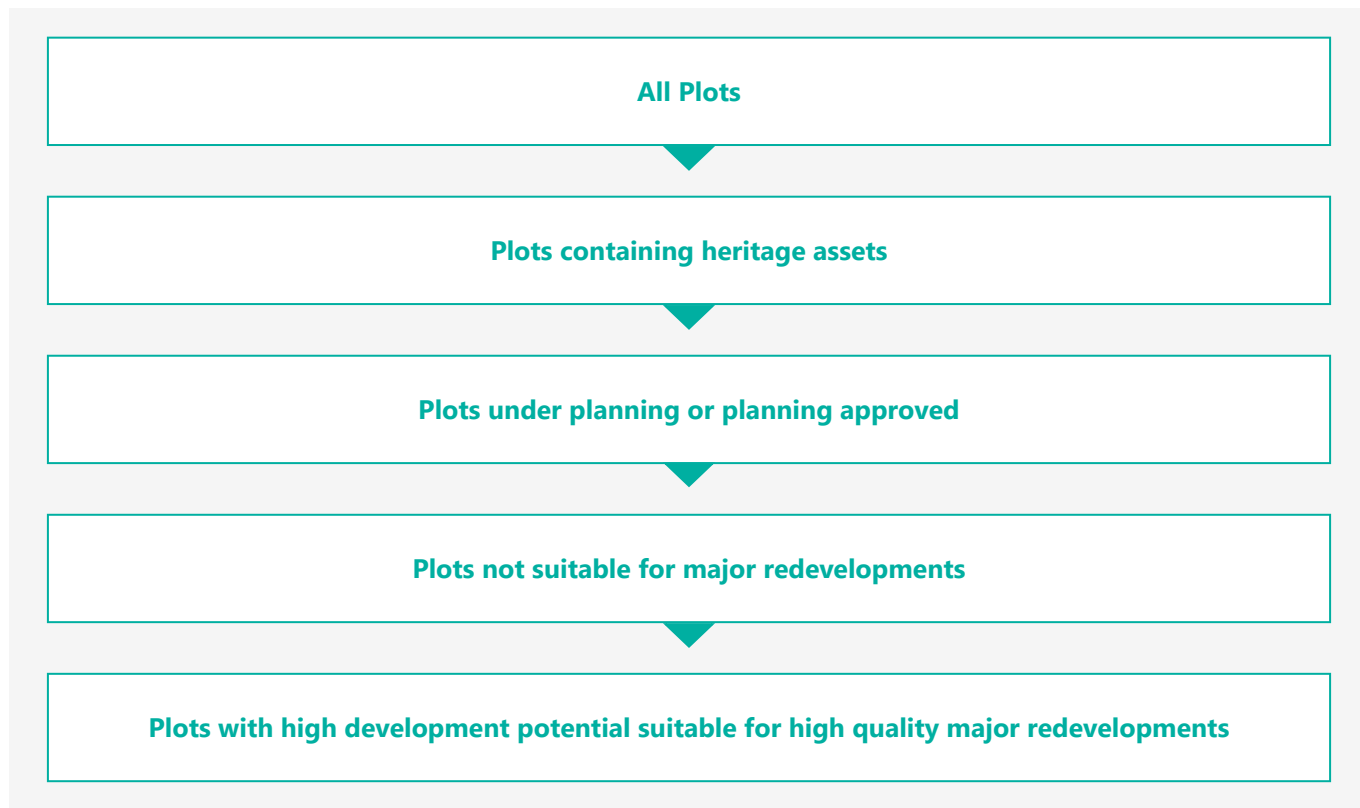
5.6. The urban grain of the built form is dominated by the large footprint of the Broadwalk Centre. Other larger structures are situated along the A5 corridor and Station Road. The building footprints typically become smaller as the townscape transitions to more residential areas.

5.7. To the rear of the Broadwalk Centre is a large area of surface car parking, while adjacent to the west is the Forumside area which comprises a mix of brownfield land and low-rise buildings which do not relate well to each other. In combination this comprises a large, very low density town centre space which has potential for better use.

5.8. There are tall buildings within Edgware Town Centre; Premier House is 14 storeys high, while the redevelopment of Premier Place (approved in May 2016) incorporates a building of 17 storeys. Opportunities for tall buildings will be explored subject to assessment of suitability, impact and exemplary design.

Area Analysis by Segmentation

5.9. To enable detailed design analysis to be carried out, the area was split into segments based on similar characteristics. This methodology assisted in identifying which segments are appropriate for high levels of new development, and those where the potential is far lower.



Assessed Development Potential by Segment

5.10. Those sites assessed as having higher development potential will be addressed individually.

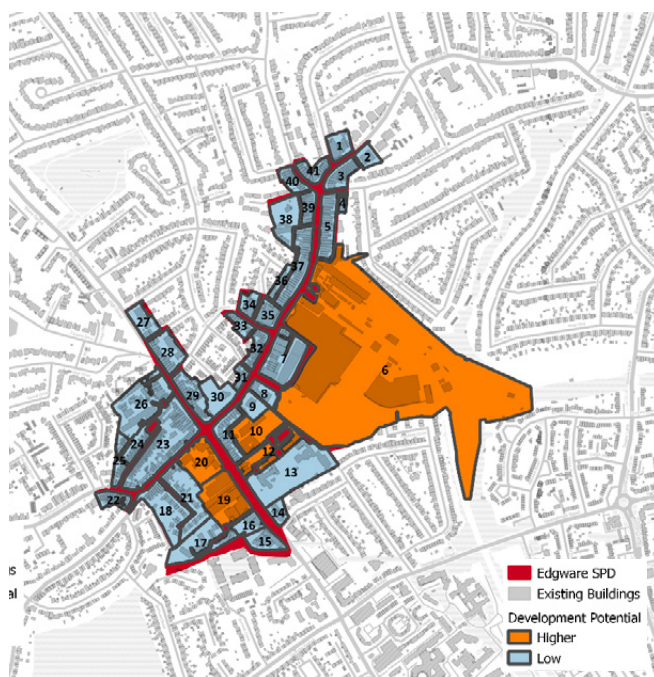


Figure 31 – Assessed Development Potential by Segment

Key Site - Broadwalk Centre and the Station

5.11. This area encompasses the Broadwalk Shopping Centre and associated car parking, Edgware Underground Station, platforms and tracks, and Edgware Bus Station, along with bus standing and garage.



Figure 32 – Aerial view over the Broadwalk Centre, underground station and bus station



Figure 33 – Broadwalk Centre frontage

- 5.12. This site lies at the heart of Edgware Town Centre and comprises a major strategic development opportunity for Edgware.
- 5.13. Future development opportunities should prioritise making the Station building and forecourt a welcoming, attractive and easy to navigate focus of public transport. The Station should provide a sense of arrival in Edgware, bringing people into the heart of the town centre and connecting this key public transport node with the surrounding town centre.
- 5.14. The site is suitable for wide range of town centre uses, including retail, cafes, restaurants and offices, as well as leisure and cultural uses such a cinema and sports centre. Residential uses are expected on a significant scale, along with supporting community infrastructure. Public transport infrastructure will continue to be a key element within the site.

Movement

- 5.15. Movement of pedestrians within and around the site is vital to ensuring the area is accessible and vibrant. Future development of the Broadwalk Shopping Centre and the TfL land holdings should provide clear and legible pedestrian linkages across the site and with the surrounding areas. Linkages must provide safe, easy and direct access to local services and facilities and form a logical and coherent whole with the surrounding network of streets. Redevelopment of the Broadwalk Shopping Centre must provide excellent pedestrian access across the site. Church Way should be improved to make the route feel open and safe. Redevelopment should also be used as a means of improving Bakery Path to make it feel safe and pleasant to use.

- 5.16. New and improved routes will make the area far more accessible for pedestrians and ensure access to/ from the train station from the interior of the site, southwards towards the residential areas, westwards towards the Forumside area and through to the A5/ High Street. A clear movement line towards the rail station and bus station must be part of any redevelopment of this site. Walking and cycling routes across the site should be used to reduce pressure on the main thoroughfares, in particular Station Road.
- 5.17. Opportunities to reduce the severance to movement caused by the Northern Line should be fully explored, including the potential for a direct link to Deans Lane. Full consultation with TfL must be undertaken to ensure London Underground infrastructure is safeguarded for operations and maintenance.

Height and Massing

- 5.18. The plan of building heights around this site, and the aerial photographs, demonstrate the varied nature of the site and surrounding area in terms of building heights, massing and urban grain. Development should be responsive to this context and balance optimising the town centre and public transport hub location.



Figure 34 – Edgware Station and forecourt



Figure 35 – The bus station entrance on to Station Road



Figure 36 – Existing building heights (note the plan is derived from an analysis of heights in metres translated to storeys and therefore the number of storeys is indicative)

- 5.19. The site has potential for the creation of a modern urban environment with opportunities for tall buildings and higher densities in some parts - dependent on high-quality design - while being sympathetic to the context and adjacent residential areas.
- 5.20. To ensure development is appropriate the following must be considered in terms of building design:

- Towards the southern edges where the site is in proximity to low-rise residential areas – notably Parkfield Close and Fairfield Crescent – the height and massing of buildings should respond to the suburban context. Proposals must also carefully consider the setting and context of heritage assets in the surrounding area, such as the Railway Hotel. Along the eastern boundary the railway lines provide a buffer to residential areas, although the raised topography of the site must be a design consideration. The height of new development should be considered in the context of its impact on overshadowing and loss of privacy.
- Proposals for tall buildings should locate them in those parts of the site where there is more potential to establish a high-quality urban design that achieves higher densities. Building heights and massing should be varied to achieve an attractive mix of building types that is beneficial to the urban landscape and allows new residents access to views and sunlight. Any proposal for tall buildings will be subject to assessment of suitability, impact and exemplary design.
- Along the part of the site adjoining Station Road building heights should be varied to avoid a ‘canyoning effect’ and excessive shadowing across the main shopping thoroughfare. The overall design must be provided in the context of the Underground Station and demonstrate wayfinding towards the public transport hub.



Figure 37 – Illustrative example of urban renewal - Agar Grove, Camden (Credit Jack Hobhouse; Hawkins Brown Architects)

- London Underground infrastructure comprising tracks and sidings to the eastern part of the site is expected to remain available over the long term for operational purposes.
- Buildings must ensure attractive and active frontages at street level so that pedestrians feel engaged with the built environment at a human scale. This will assist with natural surveillance and provide a sense of security to town centre users. Designs should avoid or minimise any blank aspects to buildings, including to the sides and rear.
- The provision of car parking for town centre users, and potentially commuters, must be based on evidence of need. Car parking provision must be efficient, utilising approaches such as multi-storey, basement or podium parking.

Open Space and Landscape

- 5.21. There is a need for more public open spaces within Edgware Town Centre and new housing will reinforce this as residents require outdoor spaces for leisure and recreation.
- 5.22. As the largest site within Edgware this location provides the best opportunity for delivering new and enhanced public open spaces. The station forecourt can provide the first in a hierarchy of linked public open spaces that are connected to create a walkable urban environment. A second public space could be used as a focus



Figure 38 – Aerial view of the Forumside area

for community and leisure uses including food and beverage outlets. One or more further spaces should be provided for local residents, which should include children’s playgrounds and facilities for older children such as football and basketball courts. The designs should include an attractive mix of planting and hard landscaping. The designs should include an attractive mix of planting and hard landscaping, and incorporate environmental benefits such as natural SUDS and supporting biodiversity.

5.23. Green landscaping can be used to create buffer areas to transition between new development and the existing suburban areas to the east and south. A corridor of trees already runs along Church Way and extends around the railway lines, providing the basis for greenery which could provide an attractive edge to the new developments and reduce the visual impacts for existing properties and residents.

Key Site - Forumside

5.24. This location includes land to the rear of the important Railway Hotel Grade II listed building and comprises businesses, car parking, residential and brownfield land under several different ownerships. The area represents a combination of derelict and underused buildings and is blighted by dumping and fly-tipping.

5.25. A coordinated approach is required to realise the full potential, including an opportunity to create a new high-quality ‘heritage quarter’ that enables restoration of the Railway Hotel as a celebrated landmark asset. The current poor-quality environment must be transformed to become welcoming, clean and safe with greatly improved linkages to the surrounding areas. The area would be suitable for a range of mixed town centre uses along with opportunities to introduce new residential and supporting community infrastructure.

Movement and Frontages

5.26. Access is poor, with the narrow Forumside road leading off Station Road, and two narrow access off the A5/ High Street. The route through is twisting and is affected by the presence of wheelie bins and poorly parked cars. There is no access from the south or onto Church Way to the east.

5.27. Redevelopment of the area must provide much improved public access onto the A5/ High Street and Station Road and new access eastwards onto Church Way and towards the Broadwalk Centre site. The priority should be on pedestrian and bicycle access and movement, along with service vehicle access. There must be active frontages facing onto the routes to create an attractive and safe environment. The new walking and cycling routes across the site should be used to help reduce pressure on the main thoroughfares, particularly the A5/ High Street and Station Road.

5.28. New developments must be supportive of the existing frontages on the A5/ High Street and Station Road to complement the existing Town Centre. This includes supporting the restoration of the Railway Hotel and its frontage area of hardstanding which has great potential to benefit this part of Station Road, for example through outdoor seating for a café, restaurant or bar.

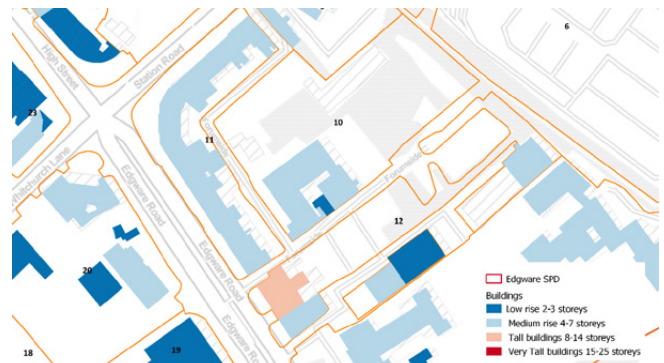


Figure 39 – Existing building heights (note the plan is derived from an analysis of heights in metres translated to storeys and therefore the number of storeys is indicative)

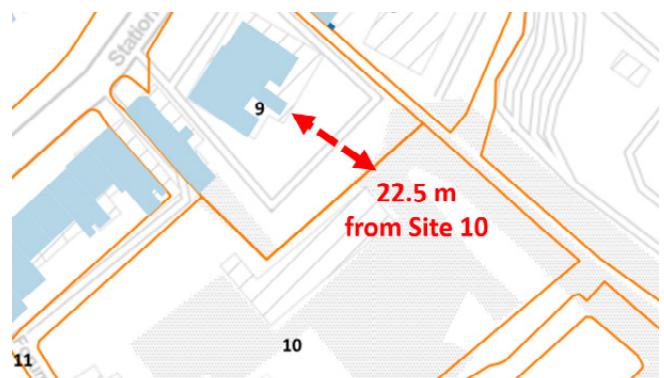


Figure 40 – Distance between the Railway Hotel heritage building and the Forumside site



Figure 41 – Illustrative example of urban development in Barnet at Beechwood Mews (visualisations credit Fumo Studios Ltd; model Peter Barber Architects)

Height and Massing

5.29. The existing built environment provides a strong context for the area. The historic Railway Hotel lies to the north, while an inter-war 3-storey shopping frontage curves around to the north west. To the south west of the site a modern tall building block faces on to the A5/ High Street, while to the south are the low-rise buildings and playground of Edgware Primary School. To the east is Church Way and beyond it the surface level Broadwalk Centre car park – the site identified above.

5.30. To ensure development is appropriate the following must be considered in terms of building design:

- The context of the listed Railway Hotel is a key consideration in any redevelopment scenario with the heritage building lying 22 metres from the edge of the Forumside site. The scale of proposals should be modest to the rear of the heritage asset with an approach of low to medium rise-high-density development. A fine-textured urban grain should be used to complement the Railway Hotel and develop a high-quality 'heritage quarter'.
- The westerly parts of the site could potentially see medium rise development with a height and design that complements and does not adversely affect the surrounding inter-war frontage.
- The south western areas have more potential for height towards the existing tall building fronting onto the A5/ High Street. The context of the primary school must be given due consideration in terms of visual impact and avoidance of overlooking.

Open Spaces

5.31. The area lacks public open space and new development must ensure sufficient provision for new residents. A small park for leisure and recreation should be provided, including a children's playground and potentially a court for football and basketball. A location towards the southern part of the site could be linked to Church Way and new pedestrian routes through the Forumside area, while providing a buffer with Edgware Primary School.



Figure 42 – Existing building heights (note the plan is derived from an analysis of heights in metres translated to storeys and therefore the number of storeys is indicative)



Figure 43 – Illustrative example of urban development in Barnet at Beechwood Mews (visualisations credit Fumo Studios Ltd; model Peter Barber Architects)

Key Sites - Lidl and The Masons Arms

5.32. The sites lie on the corner between the A5/ High Street and Whitchurch Lane. The sites include a Lidl supermarket, self-storage unit, office block, showroom, car parking and valuable heritage assets, including 65-67 High Street, a Grade II listed 16th Century timber-framed Hall house, and the Masons Arms pub which is on the corner between the A5/ High Street and Whitchurch Lane and provides a local landmark.

5.33. The sites could be intensified through new development with residential uses above while continuing to protect the heritage buildings and providing the existing town centre uses on the ground floor, including the Lidl supermarket.

Height and Massing

5.34. Existing buildings on site range from single storey retailers to medium rise office buildings. The A5/ High Street context includes a mix of low-rise to tall buildings. To the west of the site is low-rise rise housing.

5.35. To ensure the development is appropriate the following must be considered in terms of building design:

- The listed buildings and Mason’s Arms should be retained and restored/ brought back into use to preserve the local historic character of the location.
- The remainder of the site could potentially accommodate medium size buildings and be optimised through a mass that complements the listed buildings and the low-rise residential area to the west.
- Town centre uses should be retained at the ground floor, including the Lidl supermarket.

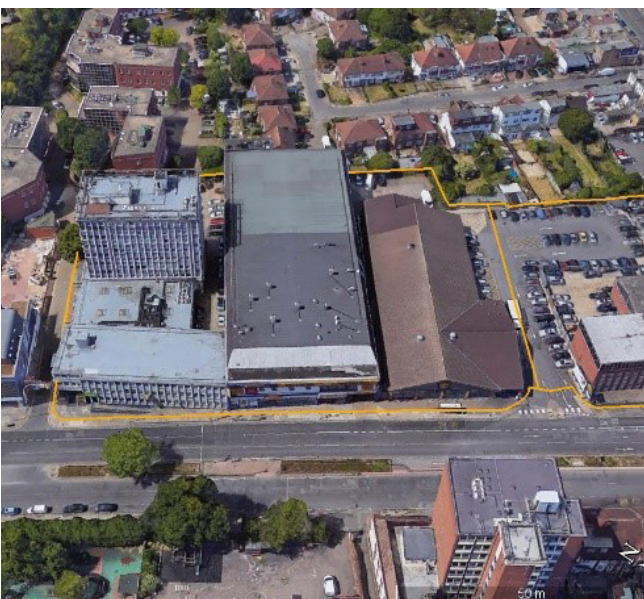


Figure 44 – Aerial view of commercial buildings fronting the A5/ High Street

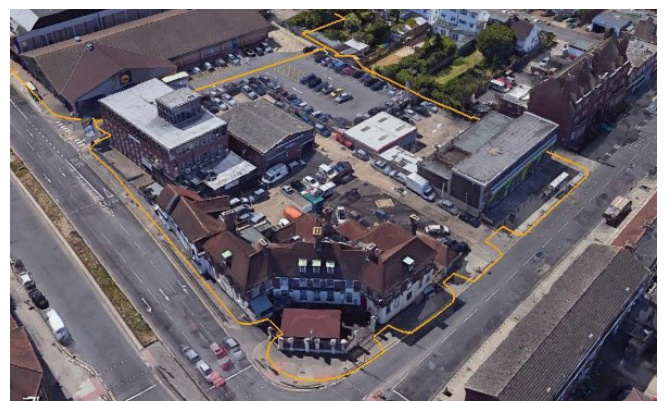


Figure 45 – Aerial view of the Masons Arms

6.

Public Realm Guide

6. Public Realm Guide

6.1. The experience for pedestrians and cyclists within Edgware Town Centre is often not as good as it should be in terms of wayfinding, signage, planting and street furniture. Improvements to the public realm is a key development principle for the Edgware SPD and are an opportunity to meet a range of needs within the SPD area:

- Tackling air and noise pollution;
- Better accessibility;
- Design appropriate to the context of heritage assets;
- Activation of the frontages and public areas for community and cultural events;
- Sustainable travel infrastructure, for example bike racks;
- Public safety, including in terms of lighting, design and security cameras.

6.2. Some of the change will be within the major development sites, while much will be along the main thoroughfares of Station Road, Whitchurch Lane and along the A5/ High Street, and the roads and paths which provide linkages to the surrounding areas.

6.3. Proposed changes should support the Healthy Streets Approach, including:

- Improving local environments by providing more space for walking and cycling, and better public spaces where people can interact;
- Prioritising better and more affordable public transport and safer and more appealing routes for walking and cycling;
- Planning new developments so people can walk or cycle to local shops, schools and workplaces, and have good public transport links for longer journeys.



Figure 47 – Young trees lining Station Road

Signage

6.4. Signage in the area, particularly along Station Road, but also along Whitchurch Lane and the A5/ High Street, is excessive and distracting. There is an issue with letting agent signs on upper floors of buildings as highlighted below.

6.5. Shop signage is often too large and ill-matched with adjacent shops, visually dominating the frontages, giving an overall disjointed appearance and covering architectural features that would otherwise add character.

6.6. Advertisements and signs should seek to:

- Be well related to their surroundings in terms of size, scale and siting;
- Be located to avoid visual clutter;
- Not conflict with traffic signs or signals or be likely to cause confusion or danger to road users;
- Respect the character and architectural details of any building on which they are to be located.

Planting

6.7. Well considered and maintained planting – which includes trees, landscaped areas for shrubs and flowers, or dedicated planter boxes or hanging baskets - all help to improve the visual aspects of an area, can assist with wayfinding, and can help with environmental factors such as providing natural SUDS, and reducing temperatures in the summer.

6.8. Planting on Station Road is not consistent; along the eastern section street trees have been successfully planted and will mature in the coming years to form a pleasant and memorable part of the street.



Figure 46 – Highlighting the prevalence of signage on shopping frontages

- 6.9. Along the central and western parts of Station Road there is very little planting beyond the raised shrub bed in front of the Broadwalk Centre, with the only vegetation provided by the mature and attractive trees in St. Margaret's Churchyard.
- 6.10. Along the southern part of the A5/ High Street the central reservation raised planted strip is not maintained and has a unkept appearance; unless it can be improved removal should be considered. Some greenery is provided by trees and shrubs growing along the primary school boundary.

Otherwise there is a general lack of planting and greenery, particularly around the junction with Station Road and Whitchurch Lane.

- 6.11. There is an almost no planting or greenery along Whitchurch Lane excepting a few small planters which lack impact or maintenance.
- 6.12. Many of the numerous pathways which link through the area do have large amounts of trees and other vegetation. While this does provide many advantages, it is not always well maintained and leads to a gloomy and isolating experience.



Figure 48 – Trees provide shading for street users

Potential Improvements

- 6.13. The good example of street tree planning along the eastern part of Station Road should be used across Edgware Town Centre, including the full length of Station Road, along Whitchurch Lane and the A5/ High Street, particularly in the wide area in front of the listed buildings along the north west section.
- 6.14. An aspect of planting that must be considered is its potential long-term impact on security and surveillance systems. Lines of sight must be maintained between cameras, while at street level planting must avoid creating locations

that are hard to observe and may conceal anti-social or criminal activity. Proposals should work with Secured by Design Officers at the earliest opportunity.

- 6.15. Use of raised planters should also be considered throughout the town centre, although a long-term maintenance regime must be in place to ensure they remain a benefit to the area.
- 6.16. These measures will help to animate Edgware's streets and provide a much-improved experience for town centre users, particularly pedestrians and cycles

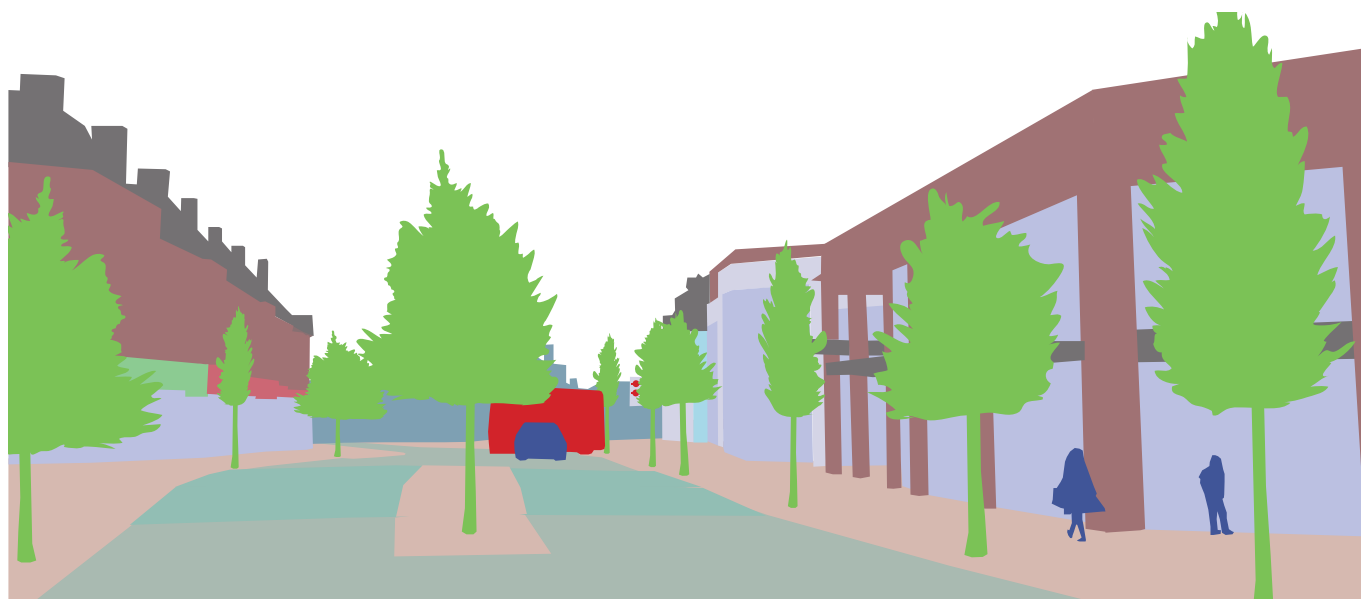


Figure 49 – Illustration of trees benefiting the street scene in front of the Broadwalk Centre



Figure 50 – Illustrative example of a green wall providing a landmark feature

Street Furniture

6.17. There is an overall lack of seating; more benches could be introduced as part of a Street Plan, providing opportunities to rest and socialise. Any new street furniture must be of a high quality and appropriate design that improves the appearance and coherence of the town centre; for example, designs could mirror the inter-war heritage of the buildings frontages and provide a distinctive and unique feel to the area.

Wayfinding

6.18. While main roads and key buildings do help to waymark the area, routes through Edgware Town Centre are not always clearly marked and signage seems geared towards the private vehicle rather than pedestrians. The bus station for example is not prominent and the entrance is indistinct, while some pathways are hard to find and access.

Potential Improvements

6.19. The situation can be helped through more and better signage. Other public realm improvements such as installing plants and street furniture can be used to provide visual clues that to guide people around the town centre. There is also potential for special/ contrasting pavement to indicate directions and paths.

6.20. Buildings design can be used for wayfinding through height, massing and distinctive elements, for example green walls could be used to help provide mental markers.



7.

Transport and Movement Guide

7. Transport and Movement Guide

- 7.1. Improving the transport and movement options is a critical element in improving Edgware Town Centre and making it a more attractive and sustainable destination. This section provides further detail to the approach established earlier in the Objectives and Development Principles.
- 7.2. To provide analysis of the transport and movement context in Edgware Town Centre a Transport Study was undertaken. The Study identifies issues and potential opportunities for change to support Edgware Town Centre, focussing on enabling movement by sustainable travel modes, i.e. walking, cycling and public transport. The Study provides analysis of the existing transport situation in Edgware, assesses the transport and movement implications of the proposed major development sites, and outlines a range of potential transport measures and interventions for the future. Further and more detailed technical analysis and Transport Assessments will be required during master planning and planning application phases.
- 7.3. **Pedestrians** show the highest concentrations of activity along the Station Road corridor, particularly around the tube station and the shopping centre – evening peak flows are approximately twice as high as the morning peak. The tube lines create a major barrier to east-west movement, and while pedestrian links provide short-cuts to residential areas these are often narrow and poorly lit. Dedicated pedestrian crossing provision is missing at key road junctions, notably High Street / Station Road. High levels of assessed 'walkability' indicate a substantial number of trips currently made by car within the area have the potential to be switched to walking. There is a need to move towards a fully accessible, permeable and pedestrian friendly town centre with increased street space for walking and cycling.
- 7.4. There are very low levels of **cycling** activity with peak flows typically only 1-4 cyclists per hour in each direction. Barnet as a whole makes only 2% of trips by bicycle, while in Harrow it is only 1%, compared to 8% in Haringey. Cycle lane and other infrastructure provision is very limited. Cycle racks at Edgware Station were observed to be well-used throughout the day with additional bicycles parked along the railings suggesting demand for commuter cycle parking exceeds supply. There are several pedestrian-only routes where cyclists need to dismount, while Station Road and High Street are the least cyclable due to wide carriageways, high vehicle speeds and a lack of cycling infrastructure. The 'cycleability' of the SPD area varies from low to medium. TfL has identified the A5 as one of London's top 25 routes with cycle potential. The Barnet Loop cycling proposal, as set out in Barnet's Long Term Transport Strategy (LTTTS), passes through Edgware and should be supported to provide an off road walking and cycling route linking Edgware southwards towards The Hyde, Burnt Oak and Colindale, and to the north and east of the borough.

Analysis of Existing Transport and Movement Situation

- 7.5. There is a good provision of frequent **bus services**, contributing to PTAL scores between PTAL 5 and 6b (the highest rating). Edgware bus station is the main bus hub for the area catering for local trips, an interchange for longer journeys, and interchange with the underground station. The quality of public realm around the station could be improved. Nearly the whole SPD area is within 400m walk of a bus stop. During peak hours bus speeds are relatively slow, being around 7mph during the PM peak on Station Road and the High Street versus around 9 mph in the AM peak. TfL forecasts indicate a substantial increase in bus boarding and alighting activity in the SPD area. Barnet's Transport Strategy seeks an increase in the orbital connectivity of bus routes to better link together town centres and tube stations, an approach that could include a bus rapid transit (BRT) option.

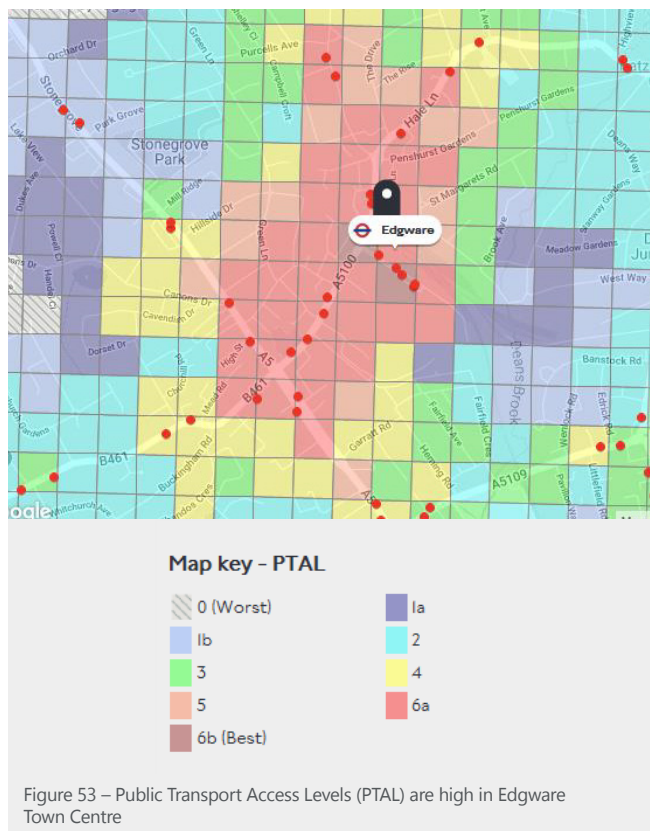


Figure 51 – Cycle racks in front of Edgware Station



Figure 52 – The Northern Line provide a good tube service for Edgware

7.6. Edgware **tube** station operates as an integrated interchange with the adjacent bus station with one third of tube station users arriving by bus during the morning peak. Whilst busy at peak times, and despite recent growth in entry/exit flows, the station is observed to currently operate within capacity. The planned growth at Edgware is expected to significantly increase usage of the station, particularly at the morning and evening peaks. The station forecourt prioritises vehicles, but this does not prevent congestion and queuing onto Station Road during the peak period.



7.7. Edgware roads are often highly congested with **traffic flows** the highest in the morning peak (8-9am) - Station Road flows are around 1,500 vehicles per hour in both directions, while Edgwarebury Lane, Hale Lane and Whitchurch Lane) have flows of around 1,000 vehicles per hour. A worsening highway performance in recent years is suggested by a 6% to 10% fall in traffic speeds along Station Road and a decrease of 10% to 20% along the High Street between 2013/14 and 2015/16, a performance consistent with falling average bus speeds.

7.8. A single large off-street **car park** serves the town centre with 1,150 short-stay and long-stay spaces. The long-stay commuter off-street parking is used to capacity while the short-stay shopper parking is typically at 60% full on a weekday. On-street parking is covered by several Controlled Parking Zones (CPZs) with spare on-street parking capacity observed at all times of day.

Designing for Edgware’s Transport and Movement Needs

7.9. To meet the town centre’s transport and movement needs development should include the following considerations:

Promoting Active Travel

- TfL’s Healthy Streets approach provides a set of tools to help design and promote active travel in Edgware;
- Edgware town centre seeks opportunities to improve travel choices; supporting measures to prioritise pedestrian and cycle and support reliable buses services;
- Walking and cycling should be designed to be the preferred choice for all short to medium distance journeys;
- Longer distance leisure and commuter travel via public transport, walking or cycling should be encouraged by improved links to more strategic active links that exist or are being developed, for example the A5, London Loop, and Barnet Loop;
- The choice to walk and cycle should be an easy choice encouraged by design and provision of facilities, by improvements to the quality of public realm and public spaces that encourages people to walk/ cycle to, and use, local services and shops;
- Development to be permeable and enable convenient and high-quality cycle and pedestrian routes from the development areas that link into wider desire lines;
- Public realm design to support walk and cycle links and provide for meeting areas and seating;
- Boost health and well-being of local community through contributing to air quality improvements and lower noise levels;
- Promote a safer and more secure environment for all road users including pedestrians and cyclists, making the roads less vehicle dominated, and considering a 20 mph zone on Station Road;
- Cycle parking designed in accord with London Cycle Design Standards, provision of a cycle hub and provision within the public realm.

Public Transport Accessibility, Legibility and Capacity

- A station capacity which enables people with varying levels of mobility to use the station;
- Protect line capacity to support growth in Edgware and along this branch of the Northern Line, including depot space and rail sidings;
- Support bus reliability and access by safeguarding space for bus operations/standing and also improving the public realm of the bus station itself;

- Edgware bus station must:

1. Maintain a central location and enable easy interchange;

2. Overcome the severance caused by bus access on to Station Road and reduce conflict with pedestrians accessing the station and its immediate surroundings;

3. Provide intuitive way finding;

4. Offer high quality passenger information and waiting facilities;

5. Ensure integration of the station with its surrounding context.

- Interchange between bus and London Underground services is and will remain important. The guiding principle is to improve passenger experience by finding the balance between space, legibility/ visibility and proximity between modes;
- Make the most of transport heritage and architecture to help promote local identity and sense of place, particularly the London Underground station and design heritage;
- Land uses in Edgware Town Centre must be planned and designed to ensure that public transport uses (bus garage; bus station and stand; rail station, sidings and depot) remain viable and can continue or grow without unreasonable restrictions being placed on them (i.e. in line with the Agent of Change principle - transport services operate around the clock and throughout the year).

Delivery, servicing and vehicle access

- Accessible car parking (Blue Badge) will be needed for future users and residents of the town centre;
- Where vehicle access and car parking is provided this should be designed to ensure access is safe and seeks a balance between supporting a vibrant high street and supporting a mode shift and reducing dependencies on car use;
- Where car parking is provided this should provide Electric Vehicle Charging Points;
- Where there is a conflict between vehicle access points, especially Heavy Good Vehicle routes, and pedestrian and cycle route, a risk assessment will be required to inform any mitigation strategy;

- Development servicing, deliveries and refuse collection will operate on the basis of comprehensive delivery consolidation to minimise vehicle movements to and within the development area; and
- There should be retention of some car parking for town centre users, and potentially commuters, depending on assessed need. Car parking provision must be efficient, utilising approaches such as multi-storey, basement or podium parking. The well-connected nature of the area will reduce the need for cars, particularly in new residential developments.

Transport Measures

- 7.10. To test the likely impact of Local Plan developments assumptions, particularly the impact of new housing delivery, analysis was undertaken.
- 7.11. The outcomes indicated a substantial number of trips across the day:
- A clear morning peak that is dominated by work and education trips;
 - A mid-afternoon peak created by school departures; and
 - An evening peak spread over several hours (4-7pm) that comprises a mix of work, leisure and personal journey purposes.
- 7.12. A schedule of delivery and timescale for transport measures is included in Chapter 8.

Roads and Traffic

- 7.13. Proposed changes to the road and street environment throughout Edgware Town Centre should take a Healthy Streets Approach.
- 7.14. The approach to traffic management should take into account that bus usage is expected to increase, and the following should be considered:
- Bus priority where traffic queuing occurs;
 - Managing the conflict between bus movements and drop-off at the Tube station by private vehicles.
- 7.15. The central part of Station Road is used for informal parking, creating issues with safety, traffic management and visually. Measures should be taken to tackle this, potentially through either traffic enforcement action, or physical interventions making it more difficult to park.
- 7.16. Opportunities should be assessed to improve and potentially add new road crossings for pedestrians to provide a better and safer experience, particularly across the A5/ High Street to connect the Harrow and Barnet parts of the town centre, along Station Road, and at the eastern end on Hale Lane and Edgwarebury Lane.

8.

Delivery and Implementation

8. Delivery and Implementation

- 8.1. The planning framework will guide the redevelopment of Edgware Town Centre with the councils using their planning powers to work towards achieving the Vision and Objectives established through this SPD. Successful implementation will be achieved through council engagement with landowners, developers and local stakeholders including businesses, community groups and residents.
- 8.2. Growth in Edgware must prioritise employment and skills opportunities for local people, for example through securing construction apprenticeships arising with the development opportunities.
- 8.3. Building works can be very disruptive and the councils will expect sufficient measures to be put in place by developers to ameliorate impacts on existing business and residents.

Local Stakeholders

- 8.4. Edgware has a diverse range of local stakeholders who were engaged during preparation of the SPD. The councils will seek an ongoing relationship with the local stakeholders and organisations to support delivery of the SPD.

Landowners

- 8.5. Within the main development sites there is a mix of both privately and publicly owned land.
- 8.6. The Broadwalk Shopping Centre, which is the largest private site, was acquired by the Ballymore Group in 2020. Sainsburys are a long-term leaseholder and will be a key consideration in redevelopment of the site.
- 8.7. The Forumside area to the south west, including land to the rear of the key Railway Hotel heritage asset, is comprised of multiple land ownerships. Access into this area is limited and a coordinated approach is supported to realise the full potential.
- 8.8. Transport for London are the largest public landowner, with the site comprising the underground rail station and track areas, the bus station, standing area and garage as well as retail, residential and a medical centre.
- 8.9. The councils will seek a cooperative and coordinated approach, encouraging landowners to work together to optimise the opportunities and address issues.
- 8.10. In some instances, development may be most effectively realised through a process of land assembly. While it is anticipated that this process will be carried out through negotiation, the councils will pursue the option of compulsory purchases orders (CPO) if required.

Planning Obligations

- 8.11. Growth in Edgware must deliver the infrastructure and environmental improvements needed by the local community.
- 8.12. Planning obligation requirements can be used to secure these improvements.
- 8.13. The infrastructure priorities in Edgware Town Centre include:
 - Transport and movement projects that support walking, cycling and public transport use;
 - New public open space throughout the town centre;
 - Improved public realm - including street furniture, planting and landscaping; better frontages (consider the potential for a fund to provide improved signage);
 - Affordable housing;
 - Environmental measures – Sustainable Urban Drainage Systems (SUDS), renewal and low carbon energy, and biodiversity net gain;
 - Community facilities including for education, nursery provision and health facilities, for example improvements to existing premises to increase capacity or supporting the new delivery of new facilities.
- 8.14. Whilst the existing planning obligation mechanisms of Section 106 and Community Infrastructure Levy (CIL) are summarised below, the Government White Paper *Planning for the Future* is proposes a major change in approach which would see the end of S106 legal agreements and CIL set at the national level.

Section 106

- 8.15. Section 106 (S106) contributions can be sought from major developments coming forward within Edgware Town Centre where it can be demonstrated that the contribution is:
 - Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 8.16. S106 obligations should be used to mitigate site-specific impacts, including both financial and 'in kind' contributions.

Community Infrastructure Levy

- 8.17. The Community Infrastructure Levy (CIL) is a planning charge that Local Authorities and the Mayor of London can set on new development to help pay for community infrastructure. Most development which creates new floorspace is required to pay the Community Infrastructure Levy. Both Barnet and Harrow councils have adopted CIL Charging Schedules.
- 8.18. Given the nature and the scale of emerging proposals for major developments within Edgware Town Centre, it is likely that proposals would incur a significant CIL liability.
- 8.19. The Infrastructure Funding Statement (IFS) identifies the infrastructure CIL is required to support, and developers should refer to the most recent IFS, along with the Planning Obligations SPD. Developer contributions for the items set out in the IFS cannot be sought through Section 106 Agreements.

Phasing Strategy

- 8.20. The scale of regeneration in Edgware means that change will happen over several years, and at different rates in different places during the SPD period. The tables below set out a broad timeframe for key deliverables, with early delivery being broadly 0-5 years, medium term 5-10 years and longer term 10-15 years.

Delivery Timelines (non-transport)

ACTIONS	EARLY DELIVERY	MEDIUM TERM	LONGER TERM
New leisure uses – e.g. cinema, leisure centre	✓	✓	
More eating and drinking out outlets	✓	✓	✓
Improved public realm – better quality streets and footpaths, including tree planting and landscaping	✓	✓	✓
New and improved cultural offering	✓	✓	✓
New interlinked open spaces	✓	✓	✓
Diverse housing delivery	✓	✓	✓
Railway Hotel restored and brought back into use	✓	✓	
School places as required	✓	✓	✓
Health facilities as required	✓	✓	✓
Environmental measure – SUDS	✓	✓	✓
Environmental measure - renewal and low carbon energy	✓	✓	✓
Environmental measure - biodiversity net gain	✓	✓	✓
Economy – provide new commercial floorspace	✓	✓	✓
Economy – skills and employment training	✓	✓	✓
Economy – increased employment opportunities	✓	✓	✓

Delivery Timelines (Transport)

THEME	MEASURE	EARLY DELIVERY	MEDIUM TERM	LONGER TERM
Walking and cycling	Use TfL's Healthy Streets approach	✓	✓	✓
Walking and cycling	Active Travel Zone	✓	✓	✓
Walking	Direct, well-signed and high-quality pedestrian links	✓	✓	✓
Walking	Improve pedestrian crossing provision	✓	✓	✓
Walking	Address actual and perceived personal security concerns	✓	✓	✓
Cycling	Provide dedicated cycling infrastructure	✓	✓	✓
Cycling	Cycle parking, including hubs	✓	✓	✓
Walking and cycling	Promote behaviour change (Transport Classification of Londoners)	✓	✓	✓
Walking and cycling	'Travel Planning' measures and interventions.	✓	✓	✓
Traffic Management	Reduce peak time queueing	✓	✓	✓
Traffic Management	Introduce speed-reduction measures	✓	✓	✓
Traffic Management	Modal conflict risk assessments	✓	✓	✓
Traffic Management	Focussed local management (eg schools)	✓	✓	
Deliveries and Servicing	Rationalise existing deliveries/servicing	✓	✓	
Deliveries and Servicing	Delivery consolidation measures	✓	✓	✓
Bus	Improve the relationship between the bus station and other town centre users	✓	✓	
Bus	Safeguard space for future bus operations/standing	✓	✓	✓
Bus	Provide for a larger bus garaging solution (incl. electrification requirements)		✓	✓

THEME	MEASURE	EARLY DELIVERY	MEDIUM TERM	LONGER TERM
Bus	Develop proposals for a new or upgraded integrated bus station facility		✓	✓
Bus	Introduce demand-responsive service		✓	✓
Bus and Tube	Promote a high-quality interchange between bus and LU		✓	✓
Tube	Investigate need for LU station entry/exit improvements		✓	✓
Tube	Ensure LU sufficient station capacity for all users		✓	✓
Tube	Protect line capacity to support growth (incl. depot and sidings)	✓	✓	✓
Parking	Reduce off-street car-parking through a phased approach over time	✓	✓	✓
Parking	Maximise utilisation of off-street parking throughout the day	✓	✓	✓
Parking	Introduce car-share clubs	✓	✓	✓
Parking	Accessible (Blue Badge) car parking	✓	✓	✓
Parking	Electric vehicle charging points	✓	✓	✓
Public Realm	Focussed public realm improvements on the Station Road corridor	✓	✓	✓
Public Realm	Create new public spaces that are inclusive and accessible	✓	✓	✓

Edgware Growth Area SPD

Schedule of Representations and Responses

June 2021

Edgware SPD Responses

Rep No.	Organisation
1	Resident
2	TfL (Infrastructure Protection)
3	Resident
4	Resident
5	Resident
6	Resident
7	Resident
8	Resident
8a	Resident
9	Resident
10	The Barnet Eye (Blogspot)
11	Resident
12	Resident
13	Resident
14	Resident
15	Resident
16	Resident
17	Resident
18	Resident
19	Canal & River Trust
20	Resident
21	Resident
22	Natural England
23	Resident
24	Resident
25	Resident
26	Resident

27	Chairman Canons Park Estate
28	Metropolitan Police - Designing Out Crime Officer
29	HADAS (Hendon and District Archaeological Society)
30	Resident
31	Resident
31a	Resident
32	Residents
33	Resident
34	Resident
35	Highways England
36	Avison Young - 360 Burnt Oak Broadway
37	Residents
38	Sport England
39	Resident
40	Residents
41	Resident
42	Resident
43	Resident
44	Resident
45	Resident
46	Resident
47	Resident
48	Resident
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58	Resident
59	Resident
60	Resident
61	Resident
62	Resident
63	Historic England
64	Resident
65	Resident
66	Resident
67	Barnet Borough Arts Council
68	NHS HUDU
69	Savills on behalf of Ballymore Group and TfL Commercial Development
70	Centro Premier House
71	Resident
72	Historic England Archaeology
73	Environment Agency
74	TfL
75	Owner – Ballard Mews
76	Resident
77	Local Worker

Rep No.	Representor	Section	Summary of Comments	Councils Response
1	Resident	General	Residents are very proud of Edgwares history and to have it eradicated by the architects futureistic vision that it should consist of bland concrete high rise flats is going to be a tipping point in view of the already massive eradication of buildings shops and sites to be replaced by over indulgence of high rise buildings on this side of the borough compared to the glaring lack in still picturesque, High Barnet.	Edgware's history and heritage are a key part of its appeal for local people and visitors. The SPD establishes parameters for high quality design that responds to the local context, while important but neglected heritage buildings - most notably the Railway Hotel - must be restored and brought back into use.
2	TfL (Infrastructure Protection)	General	We have no comments to make at this stage except that London Underground Infrastructure Protection needs to be consulted as Statutory Consultees on any planning application within London Underground zone of interest as per TOWN AND COUNTRY PLANNING, ENGLAND-The Town and Country Planning (Development Management Procedure) (England) Order 2015 issued on 16th April 2015. Also, where there are intended works in the Highway we would need to be notified of these so that we can ensure there is no damage to them.	Comments noted.
3	Resident	General	Our concern, which is shared by many of our friends in Edgware, is centred on the Broadwalk Shopping Centre, recently sold to private developers Our fear is that the Broadwalk will be reduced to a minimum of shops-Sainburys and not much else- and there will no longer be a range of shops, nor any parking for shoppers, as at present. If the Broadwalk goes, as a SHOPPING centre, that, by itself, will help to ruin Edgware, whatever other proposals are implemented.	The SPD seeks significant improvements to the environment to make a better town centre experience and encourage more people to visit and spend money in the local businesses.

4	Resident	General	Live in Burnt Oak and still waiting for regeneration to materialise. Viewed plans for the area some years ago which promised flower pots, limited parking and beautiful clean streets – none of this has been delivered.	The SPD is a framework for enabling positive change, shaping the future of the town centre.
5	Resident	General	<p>I recently saw that there is a plan to regenerate the Edgware high street area (e.g. Broadwalk etc.). I am strongly for the idea, as the area is in much need of TLC. I do have some thoughts:</p> <ul style="list-style-type: none"> - I typically avoid the area because of Burnt Oak and the dangers around there (frequently people high on heavy drugs and fighting, carelessness of people in the area when it comes to littering and keeping the streets clean). - The centre is definitely rundown, and I feel like I'm walking into a residential elderly home when going into Broadwalk. The ventilation is so bad there, and lack of natural light is almost depressing. Something like this can be solved by looking towards modern architecture (e.g. look at the way Westfield Shepherds Bush incorporates large window walls/ceilings). <p>Furthermore, I would like to raise the final concern around your affordable housing plan, which I can imagine involves large residential blocks now. With the growing amount of residential buildings that are ~10 floors high, there is becoming less and less sunlight passing through onto the streets. This is incredibly bad for the natural environment (one of your pillars in the redevelopment plans) and something that needs to be strongly considered by developers who build such buildings going forward. New building designs should start including designs that enable natural light to pass through every few meters. Please refer to this article in The Financial Times that demonstrates ideas upon which you can create building policies around. Concepts like "Atriums" for buildings should become commonplace.</p>	<p>The issues of crime and anti-social behaviour are addressed in the SPD. Renewal of the town centre and the regeneration of brownfield land will remove the spaces that can support these problems. The SPD supports a 'secured by design' approach such as ensuring that natural surveillance of places is achieved.</p> <p>While Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings, the SPD and other planning documents require that the design of any tall building must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>

			Overall I am glad to see the redevelopment of the area, and to give background on myself, I am a mid-20s professional with focus on tech & sustainability in my day-to-day projects for a large scale retailer.	
6	Resident	General	<p>If we are not careful Edgware Town Centre will die more than it has, with so many good shops already closed forever. What keeps it alive is the good car park , free for one and half hours behind the shopping mall In my and many people I talk too views the most important item is to make sure that the number of parking spaces in the main car park is not reduced by ANY spaces and the free time & current duration is confirmed. These two should be non negotiable in any plans put forward to the planning department.</p> <p>Secondly many high streets have already been ruined by poorly thought out cycle lanes , slowing cars and forcing many to find new places to shop.</p>	The SPD supports Edgware continuing as a Major Town Centre, with significant improvements to the shopping environment as well as more sustainable transport options. Car parking for town centre users will be assessed and designs will seek to make provision more efficient, e.g. through basement or podium parking.
7	Resident	General	<p>The document that has been circulated is optimistic about the current state of Edgware. It is in very poor condition, often dirty, full of charity shops and betting shops with very little heart. Most people use it for perfunctory purposes to get on the tube or buses or use the now depressing and bedraggled Broadwalk.</p> <p>The new proposed residential tower blocks squashed in next to an original commercial building converted in a perfunctory way to residential are disgraceful, compressed together with no green space or landscaping similar to the slum high rises removed from Spur Road for redevelopment making the centre even more depressing. So redevelopment is a good idea, somewhat overdue as word of mouth about Edgware currently is that it is a bedraggled centre with a small Kosher corner, three recent pizza places and three fish shops! Where is the planning there?</p>	<p>The advantages and issues that characterise Edgware are highlighted. The SPD provides a framework to tackle the issues such as a lack of green spaces, an often poor quality street environment, etc, and guide development and to ensure that community benefits are realised, including new public open spaces and a much higher quality of environment. The renewal of Edgware seeks to improve the town centre offering, supporting Edgware as a destination for visitors. There will be an inclusive approach that provides a family-friendly place.</p>

			<p>There should be a massive attempt to build a community for people of all ethnic origins and age groups, this is a last chance which must be grasped to raise standards, public satisfaction and keep everyone safe.</p> <p>I don't start with the need for housing although I am not against quality well planned housing. The Spur Road redevelopment is good and all new residents enjoy it those standards should be maintained. At the centre of that redevelopment is a Church/community centre it has a heart. Edgware needs a heart.</p> <p>There is currently nowhere and nothing for young people to do or any creative outlet for members of the public. Some food shops should be cheap and accessible for example a kosher/Halal/Vegan take away falafel shop healthier than chain outlets. A happy days style Coffee Shop warm and comfortable for older residents to meet up and have Coffee and Cake.</p>	<p>This includes the provision of community facilities which are key to supporting a successfully town centre. More places for people to meet and socialise are supported by the SDP, including new leisure and cultural offering.</p>
8	Resident	General	<p>I am very upset that you are ruining our area. Ever since I was a child I was aware that Premier House was such an eyesore. Instead of pulling it down, we now have an ugly twin going up besides it. Every time we drive up Manor Park Gardens it looms over the High Street, overshadowing the area like an inner city estate? It was bad enough when they got rid of the old Cinema and built that ugly Millennium House in its place, totally out of character with the surrounding area. What are the planners trying to do to our once pretty town center? Now they want to build 14 story tower blocks? Please stop!!! Edgware is not Colindale.</p>	<p>While Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings, the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
9	Resident		<p>Delighted that at long last the development of Edgware town centre is being considered.</p> <p>Two things immediately come to mind.</p> <p>If I read it correctly, you want to reduce off-street parking. But if you want people to use the town centre- you should be increasing it. People cannot carry their</p>	<p>More sustainable transport options are supported by the SPD to provide a much improved environment for pedestrians, cyclists and people using public transport. Car parking for town centre users will be provided through</p>

			<p>weekly shopping on public transport or carry it home. Edgware has both a young population with children in buggies - so carry shopping is impossible. Also it has an aging population with people who physically cannot carry a lot or walk far. For both groups, cycling is out of the question. Unless you live in the newly developed centre of Edgware, you really need to be able to park to use the town's facilities</p>	<p>more efficient designs, for example basement or podium parking.</p>
10	The Barnet Eye (Blogspot)	General	<p>This whole process should be put on the backburner until the Covid 19 crisis is out of the way. There are two reasons for this. The first is that no one can really be sure what the fallout from covid means for our town centres, transport, working arrangements or living arrangements. Working from home has become the norm for office workers. Retail has seen a massive shift towards online sales. Restaurants, cinemas, pubs, live music venues etc have been shut for the best part of a year. Many thriving businesses that may have been looking to expand a year ago, are in survival mode.</p> <p>I would love to see a cinema return to Edgware, but the better chains such as the Everyman will have a lot on their plate just rebuilding their existing business and balance sheet, let alone looking at new cinemas. My view of these sort of schemes is that they are often simply designed to attract developers to build luxury flats. The 'add ons' such as cinemas, leisure space etc are often the first thing to go one developers get planning permission. You only have to look at all of the so called 'minor changes' to the Barratts NIMR scheme in Mill Hill, to see what happens in the real world once developers get their hands on a site.</p> <p>With the massive increase in working from home, it is very likely that areas like Edgware will need a different mix of housing to the one which has emerged in the Borough over the last few years. Far fewer people will</p>	<p>The Council has continued to progress planning document during the Covid-19 restrictions. The impact of Covid-19 on the town centre is acknowledged in the SPD and approaches to recovery are included.</p> <p>The need for Edgware to provide a much-improved leisure and cultural offer is vital to renewal of the Town Centre, along with high-quality community facilities. The Railway Hotel is a distinctive local landmark building that the SPD fully supports bringing back into a sustainably use that is beneficial to the community.</p> <p>A mix of housing sizes and tenures will support a diverse and family-friendly town centre.</p> <p>The councils carried out extensive public consultation on the SPD. Online Zoom sessions were well attended, with high levels of feedback.</p>

			<p>need commuter pads and more will need homes with decent work spaces. This has not been mentioned, which implies that post covid planning has not been addressed in this document.</p> <p>Buried away in the section on community facilities, there is a rather ominous note that, to me at least, gives the game away, as to what the council and their development partners really want. In the first bullet point, I note the use of the word 'likely' rather than 'required'. As to the second bullet point, this implies that community facilities will be moved to 'more appropriate accomodation. My experience of this, from the experience of Watling Boys club, was that new accomodation is offered, then once the council got its hands on the space, the offer was withdrawn.</p> <p>One of our key issues is The Railway Hotel I believe there is huge potential for the space. We'd like to see the council enter a partnership with the owners to encourage a MicroBrewery to take over the space, using the upstairs space for community space and wedding venue usage. The owners have clearly bought the site to redevelop. As the site is grade II listed, it must be made clear to them that this will not happen and if anything happens to the building, they will need to rebuild it in its current form I agree with the Council that we need a plan. I agree that there are many issues that need addressing. I agree that we need to see modal change. I agree with many of the aspirations here. But I think the council should pause this process until we can ascertain the post covid landscape. That does not mean allowing assets like the Railway Hotel to deteriorate further. These should be addressed. But how can a council have proper engagement on such an issue with Zoom meetings? We doubt that this is properly inclusive. Many residents will not have the ability to join these. Proper public meetings are required for such important subjects, with online access for those</p>	
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			who can't attend in person. We believe the council will leave itself open to Judicial Review if they proceed at this time in this manner	
11	Resident	General	<p>There is already Pure Gym in Edgware, Canons Park with Lake Basin and OneStonegrove for the community besides other private community centres in the heart of Edgware and local small parks. We do not need anymore. We are all supporting local businesses including local charity shops and the Broadwalk shopping centre. This centre is vital which has indoors space for winter /rainy days. We do not need anymore</p> <p>New public open spaces are already in the above shopping centre so no need for any more as it gets too congested</p> <p>We need to ensure that the streets are well maintained with cleaning and flowerbeds so they are maintained well, pleasant and become attractive street environment. Celebrating local heritage - we are already doing this by protecting Canons Park and the Conservation area.</p> <p>We do not need more tower blocks stretching and putting huge demands on the utilities which are already at bursting point. Already huge block of flats have been built between Iceland and Sainsbury in Edgware, Spring villa park new homes and other residential roads. Huge development took place 5 years ago on Stonegrove. This must stop as the density is increasing and the users are still having cars, pressure on local roads and amenities.</p> <p>We have Edgware St. and Canons park station with ample transport links with a large bus station. We do not need anymore. Cyclist cannot be safe in the area as the A5 is not wide enough to have parked vehicles and vehicle users. There are just too many accidents that have happened in the local area especially on the Edgware high street.</p>	<p>New recreational activities and sports that would benefit local residents and the town centre are fully supported by the SPD. The planning framework supports Edgware's success as a Major Town Centre, with significant improvements to the environment to encourage more people to visit and spend money in the local shops. The changes include a better street environment. Edgware currently lacks open public spaces which can provide places for people meet, hold community events, and use for outside dining. Some heritage within the area is poorly maintained and at risk and must be protected and derelict buildings brought back in to use. A better environment for cyclists and pedestrians will enable people to move around the area more easily and safely. Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>

12	Resident	General	The parking at the Broadwalk shopping centre is badly needed for local shopping, commuting, and to prevent spillover into the local area	More sustainable transport options are supported by the SPD to provide a much improved environment for pedestrians, cyclists and people using public transport. Car parking for town centre users will be provided through more efficient designs, for example basement or podium parking.
13	Resident	General	This is not the right time to do this, it should be discussed by the community, not for you to bulldoze it through. New Leisure & Culture attraction; this is a positive move. "Supporting High Street Shops". The way you are dealing with this problem, is gross stupidity you are killing the high street shops. "New Public open spaces" There are plenty of parks in the area so this is rubbish. In Station Road there are more blocks of flats being built at the moment, I believe one block is 17 stories, think where they are going to park their cars? Road Congestion the area is already grid locked in the morning and evening, Just look at the traffic in London Road (Canons Corner) and Stonegrove, have you thought about Doctors and surgery's.	Public consultation on the SPD sought widespread community involvement and discussion. The SPD supports Edgware continuing as a Major Town Centre, with significant improvements to the environment to encourage more people to visit and spend money in the local shops. These improvements include a much better street environment and providing new public spaces. Delivering new homes in accessible town centre locations will help to provide the housing needed by the boroughs in a sustainable location.
14	Resident	Chapter 7 Transport and Movement Guide	Remove the middle bays of the road taxi/car bays - those are used for other purposes - loading and unloading, causing an excessive hazard on the street and slowing down traffic. Traffic lights to facilitate the exit of buses from the bus station.	Parking in the centre of Station Road has been identified as an issue. Amend: additional text in Chapter 7 to reference tackling the parking issues in the central section of eastern Station Road. Text has also been added in relation to bus movement (see responses to TfL).
15	Resident	Development Principle 1 - Renewal of the Town Centre and High Street as a Major Destination	If the councils do choose in favour of tall buildings please give preference to buildings that have ground floors occupied by retail spaces. I like Edgware, but for me there is little to do here besides eating and [food] shopping.	Activated ground floor frontages are important for vibrant and successful town centre. Amend: include further text under Development Principle 1 to strengthen reference to active building frontages at the ground floor.

		<p>Key Site - Forumside</p> <p>And</p> <p>Principle 5 - Improved Environment and New Public Spaces</p>	<p>I really like the idea of a Heritage Quarter, and think that a great way to attract people to the town centre is by making the area behind Railway Hotel a pedestrianised open space with an amphitheater and a market. COVID-19 made us stay at home and as a result it made people more isolated (especially the elderly) and impacted their mental health. Therefore, having an open place that we can go to and actually meet our neighbours would be a wonderful addition to the town centre. If we have a cinema, we can all go there, watch a film in silence and return home. However, if we have an open air amphitheatre that can do dancing evenings, music concerts on the weekends, etc. that would give the local community a place to go and mingle. Actually talk to each other. This will help us build a better community. Therefore, by creating a heritage quarter that incorporates a multitude of things we would be able to create a unique area that attracts a diverse crowd of people and tailors to many tastes and preferences. At the same time, all of these could be designed in a way that they will generate an economic benefit to the town centre and the wider community (jobs, fresh farmers produce, entertainment, etc.</p>	<p>Providing more places for people to meet and socialise is important to the future success of Edgware and is full supported by the SPD, for example through more public spaces and an increase in cultural and leisure opportunities.</p>
16	Resident	General	<p>Flytipping, lack of maintenance of public land, lax enforcement of unlawful coach transit/drop off activity at the Railway Hotel – are a result of the local authorities’ own failings, whilst some of the latter need questioning and supplementing.</p>	<p>Regeneration of brownfield land and a much-improved environment to the rear of the Broadwalk Centre and Railway Hotel are key to tackling issues of environmental crime and anti-social behaviour, changes which the SPD planning framework will enable.</p>
		General	<p>In particular I would resist strongly the aim – which is apparently driving the entire SPD – for “a broader town centre experience [...] that draws visitors both locally and from the wider region.” Edgware is a small suburban high</p>	<p>Edgware is a Major Town Centre and the SPD seeks to support its success and improvement of the, for example</p>

			street area, closer literally and figuratively to a home counties market town than a 'destination', of which there are in turn very many within easy reach: Brent Cross, Borehamwood, Watford, etc. Partners should thus be aiming to improve Edgware within those boundaries, not turning it into a place like those others: repairing but not overreaching. Thus also omitted is recognition that the topography of Edgware – its height, the views, and especially the double curve (vertical and horizontal) of Station Road between the A5 junction and Peshurst/Hale Lane – are valuable and unique and should be considered specifically in relation to all other aspects of the proposals.	through providing a better shopping experience and an expanded cultural and leisure offering.
		Transport and Movement	The current linking of the tube station, bus waiting area and the Broadwalk via a continuous, mostly covered, pedestrian way is helpful and should be preserved but only subject to the pressing need to improve the bus entrance/exit to Station Road. Given other aims of the draft SPD, one obvious solution is to re-route buses behind Sainsbury's, along the far edge of the car park, to enter/exit using the current car route into/out – demolition of the old post office (a shame but probably necessary) would allow the road to be widened to allow this. This move would enable pedestrian-only access between Premier House and the tube station.	While Edgware benefits enormously from its tube and bus stations, the SPD supports improving the relationship of public transport to the wider town centre, in particular of the bus station.
		Principle 2 – Improved Transport and Movement Options And Chapter 7 Transport and Movement Guide	The single biggest issue in the area – alluded to in the documents but not addressed fully – is the appalling siting, phasing and management of the traffic lights and crossings at the Station Road/A5/Whitchurch Lane junction. The four pedestrian crossings, one in each road, are far too far down into the roads; they should be right up at the actual crossroads.	Safer and easier pedestrian crossings are important to improving the pedestrian environment. Amend: additional text to state that road crossings for pedestrians should be reviewed and improved, including the potential for new crossing points, to provide a better and safer experience. This is particularly needed across the High Street/ A5 to connect the Harrow

				and Barnet parts of the town centre, along Station Road, and at the eastern end on Hale Lane and Edgwarebury Lane.
17	Resident	Vision	I don't know if any of you actually live in Edgware. I would urge you to think again about the vision and instead base it on the attached posters which I think most Edgware residents are familiar with. It shows the promise of the town. The town should be recognisable when you juxtapose it with the posters. As you can see, in the poster the town has people, nature, and country but no motor vehicles, not even small ones.	Good design and celebrating Edgware's heritage are supported by the SPD, along with a much improved environment for pedestrians and cyclists.
18	Resident	General	The amount of rubbish and fly tipping in the centre, particularly around the Iceland area.	Regeneration of brownfield land and a much-improved environment to the rear of the Broadwalk Centre and Railway Hotel are key to tackling issues of environmental crime and anti-social behaviour, changes which the SPD planning framework will enable.
		Principle 2 – Improved Transport and Movement Options And Chapter 7 Transport and Movement	Lack of pedestrian lights at the major crossroads at A5/Whitchurch Lane/High Street. There is only one set of pedestrian lights to cover all four crossings.	Safer and easier pedestrian crossings are important to improving the pedestrian environment. Amend: additional text to state that road crossings for pedestrians should be reviewed and improved, including the potential for new crossing points, to provide a better and safer experience. This is particularly needed across the High Street/ A5 to connect the Harrow and Barnet parts of the town centre, along Station Road, and at the eastern end on Hale Lane and Edgwarebury Lane.

		General	Shops in Station Road tend towards cheap and cheerful. Lots of £1 shops and their equivalents. In the Broadwalk, where it's multiples, the closure of M&S was a blow and is sorely missed. No upmarket food shops eg M&S and Waitrose. The multiples tend towards the cheaper end of the market eg Clare, Poundland, Choice, Select etc. All the more upmarket shops have closed eg M&S, Body Shop, Panacea. Presumably they were not getting enough customers	Providing a better experience to encourage more visitors and shoppers will support a long-term viable town centre. With more leisure and culture as part of the offer, along with new public spaces and a better environment, the SPD seeks a successful future for Edgware.
		Principle 2 – Improved Transport and Movement Options And Chapter 7 Transport and Movement	Poor pedestrian access to Sainsbury's between 7 and 9am, when the Broadwalk opens. Pavement access at entrance to car park is very narrow and impossible with a buggy or wheelchair. General area from Station Road alongside Iceland and new development is dirty, full of overflowing bins and other rubbish. Pavements don't always have drop down area for buggies etc. when crossing roads Automated real-time bus arrivals sign in bus station is a good recent addition (I wrote several times to tfl to encourage this) but there is no linked bus arrivals sign in the station. Access to bus station from tube station is not easy.	Better access to and across Edgware Town Centre is a key element in the SPD. There is particular focus on a better environment for pedestrian and cyclists to make journeys safer and more pleasant. This includes access to the bus and train stations. Improving the relationship between the bus station and wider town centre is addressed in Development Principle 2 and Chapter 7.
19	Canal & River Trust	General	Do not manage or own any waterways that lie within the area covered by the SPD. We do, however, own and manage Brent reservoir and waterways that are downstream of Silk Stream and Deans Brook, which both lie within the SPD Policy area. Having reviewed the document, the content does not directly impact the Trust. However, we do welcome the content of Principle 8 with regards to the efforts to enhance biodiversity. Improvements to biodiversity connected to the existing green infrastructure network could help to enhance green and blue infrastructure networks downstream; including our network.	Comments noted.

20	Resident	Chapter 4 Development Principles And Chapter 5 Key Sites Design Guide	You mention in your report that you hope to 'Deliver Community Facilities', including 4.32 'locations for community organisations and activities', which 4.50 'enables effective, ongoing communication and engagement.' And also that, 5.4 'Cultural and leisure uses, shops, cafes, restaurants and community amenities can all add vibrancy to neighbourhood character.' I wondered if these aspirations might be partnered with the issue of: 5.35 'The listed buildings and Mason's Arms should be retained and restored/ brought back into use to preserve the local historic character of the location.' Perhaps the building could be restored and serve as some kind of community facility.	Bringing the Railway Hotel and Masons Arms back into use for the benefit of the community are strongly supported by the SPD.
		Principle 2 – Improved Transport and Movement Options And Chapter 7 Transport and Movement	And, secondly, I live on Edgwarebury Lane, and I cannot stress enough how dangerous, absurd and inconvenient it is that there are NO Zebra Crossings whatsoever from the centre of town (which is frequented by shoppers), through the entire length of the road to the A41, then from the A41 to the farm / park area — which is frequented by families, but especially children. Even the crossing with the A41 has no lights to cross over Edgwarebury Lane safely. I did not see any reference to this in your document, so wanted to highlight the issue.	Safer and easier pedestrian crossings are important to improving the pedestrian environment. Amend: additional text to state that road crossings for pedestrians should be reviewed and improved, including the potential for new crossing points, to provide a better and safer experience. This is particularly needed across the High Street/ A5 to connect the Harrow and Barnet parts of the town centre, along Station Road, and at the eastern end on Hale Lane and Edgwarebury Lane.
21	Resident	General	I am pleased that an attempt is being made to adopt a holistic approach to development in Edgware, in particular the active involvement of both Barnet and Harrow Councils. This could be an opportunity to put right some of the mistakes that have been made in the town centre and to encourage the local community and businesses to thrive.	Comments welcomed.

		Chapter 3 Spatial Context	The west side of Edgware High Street, within the municipal area of the London Borough of Harrow, is divided between two wards: Canons and Edgware. You refer to this in your preamble (paragraph 3.1 page 15) but then you ignore Canons in your analysis of the area profile.	There is a lack of information on Canons Ward and this will be changed. Amend: add reference to Canons Ward data in Chapter 3.
		Chapter 3 Spatial Context	The map of open spaces in the vicinity of Edgware (figure 10, page 20) you have ignored Canons Park, an important local amenity and one that has historical connections.	Figure 10 does show Canons Park on the left side of the plan.
		Consultation Statement	Disappointed to find that you have not included the Church of St Lawrence Little Stanmore (also known as St Lawrence Whitchurch) among your list of stakeholders in Appendix A of the SPD Consultation Statement (page 7). The eastern boundary of the parish of Little Stanmore is the Edgware Road and it extends from Camrose Avenue in the south to the M1 motorway in the north, so it includes all of the Edgware town centre that falls within the municipal area of Harrow.	Extensive public consultation was carried out, including contacting those organisations on the consultation databases of the London Boroughs of Harrow and Barnet, along with a leaflet drop to all addresses within 1km of the SPD boundary.
		Chapter 3 Spatial Context	There is no mention of the gate posts in Canons Drive near the junction with the High Street that once formed the entrance to the Canons estate. Although Canons Drive is just outside the area you have defined as the town centre, if you were looking for heritage assets to help define the area, these relics of the Ducal estate ought to be mentioned.	Heritage assets close the SPD boundary should be included. Amend: include reference to the date posts in Canons estate.
		Principle 2 – Improved Transport and Movement Options	For a document that sets out to adopt a holistic approach to Edgware town centre, including the areas within the municipality of both Barnet and Harrow, I thought that there was insufficient examination of ways in which the Harrow side of Edgware could be better integrated into the town centre.	Agree that more can be said on improving these linkages. Amend: expand reference to the need to improve connections with the surrounding residential areas, and between the Barnet and Harrow parts of the town centre.

		Chapter 3 Spatial Context	Figure 12, page 21 and the Design Guide (figure 1) which you have incorrectly described as Station Road in the 1920s. The photograph depicts a mature shopping centre and a cursory glance at the vehicles, the post-war traffic signs and the clothes that people were wearing should have told you that this photograph dates from the early 1950s.	This needs to be corrected. Amend: update Figure 12 caption to reference the mid twentieth century.
		Chapter 3 Spatial Context	In your survey of the development of Edgware you claim that the construction of the branch line from Finchley in 1867 marked the beginning of the growth of the town. In fact there is very little evidence that it made much difference for the next 20 or 30 years. It was not until the first decade of the twentieth century that there were the first signs of a significant increase in population and building activity. In paragraph 3.25 it would be more accurate to say, "Edgware remained largely rural and agricultural until after the First World War.	The history of change in Edgware can be expressed more clearly. Amend: text to shift the focus of development to the early twentieth century.
		Objective 1	While I agree that it is important to retain Edgware's viability as a shopping centre, I cannot support your case for enhancing the centre. Contrary to your claim in the Edgware Town Centre Economic Strategy, Edgware is not in direct competition with Brent Cross any more than it is in competition with London's West End. The strategy also draws comparisons with Harrow town centre and Watford. I have no wish to see Edgware developed along the lines of these town centres, both of which are shocking eye-sores. Let us retain Edgware as a centre that serves predominantly its local hinterland.	Edgware is s a Major Town Centre on the basis of its shopping floorspace. The councils support the town centre's status and seek to develop Edgware as a distinctive place that can attract locals and visitors to spend money and create a viable and sustainable town centre.
		Objective 2	There is nothing wrong with the aspiration in the heading of Objective 2 but then this is elaborated with the surprising statement: "Potential options include a new cinema, swimming pool and a diverse range of eating-out options." Cinemas across the western world are continuing to close in response to competition from the likes of Netflix. Are you sure that this is a sensible	The approach of a much improved leisure and cultural offer in Edgware Town Centre is set out in the SPD. While a cinema and swimming pool are suggested, further work will be carried out to identify which options are desirable and viable.

			suggestion? As for your idea of a swimming pool, you must surely be aware that we already have one in the middle of Edgware. It is within Pure Gym (in the building that replaced the old cinema). When Pure Gym acquired the LA Fitness site just over five years ago, the company closed the swimming pool because it was not financially viable.	
		Objective 4	I will admit that the Bus Station is looking a bit tired but I am not convinced that Edgware needs a completely new facility. Before the existing bus terminus was built (around 1990) all the bus stops were in Station Road and we had to wait in the cold for the buses. So it is a vast improvement on what we had before and I am sure that with some modest investment its appearance and functionality could be improved. I do not support the proposal for a major scheme to create a new transport interchange.	Edgware benefits from an effective public transport interchange that provides an excellent link between trains and buses. The SPD supports improving the relationship of the bus and rail stations with the surrounding town centre.
		Principle 1	The SPD needs to consider why the population growth that has already taken place in and around Edgware town centre has failed to stimulate the retail and leisure activity that you wish to encourage. Part of the reason will be socio-economic factors that are affecting all town centres but I believe it is also because both the private and public sectors have failed to maintain an adequate level of investment in the town (this partly reflects the underfunding of local government by successive governments). I fail to see how the creation of a new high density development will regenerate Edgware's retail and cultural environment unless there is adequate community engagement, policing and maintenance of the town infrastructure.	The accessible town centre sites do provide an opportunity for delivery of housing and investment which can renew the town centre and provide new community facilities, public spaces, leisure and cultural options.
		Objective 6 And	I am completely opposed to your proposal for a high-rise development in Edgware. In your Design Guide the area comprising the Broadwalk Centre and the Station is described as a site with the "potential for the creation of	Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that

		<p>Key site – Broadwalk Centre and the Stations</p> <p>And Principle 3</p>	<p>a modern urban environment with opportunities for tall building and higher densities in some parts" (paragraph 5.19 on page 39). This is madness. Edgware is an outer-London suburb that is still (just) on the edge of open country. Please do not allow high-rise buildings to deface our neighbourhood. Apart from destroying the character of the area, this will also increase the pressure on our overcrowded roads. In my opinion the idea that people living in close proximity to railway stations abandon all thought of owning a car is wishful thinking. In fact I see people from nearby roads parking their cars or service vehicles overnight in Montgomery Road because there is not adequate parking provision where they live. It seems to me that this gives the green light to overdevelopment and ought to be replaced by a statement that invites proposals that take account of local housing needs together with economic and environmental factors. I oppose the encouragement of developers to build a substantial number of new homes. 4.3.2 The SPD also aims to "Optimise sites to provide high quality housing in suitable locations" (paragraph 4.20, page 28). The wording is ambiguous. I hope that this means that all the sites approved for development will be high quality. I believe that any compromise on quality creates problems before very long.</p>	<p>the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs. The high levels of accessibility to public transport and town centre facilities reduce the need for car use.</p>
		<p>Principle 2</p>	<p>For both pedestrians and cyclists, crossing the Whitchurch Lane/Edgware Road junction is a risky undertaking. If a highways engineer can improve safety without creating more congestion it will be a major achievement. The document makes the observation that there is a "huge potential to improve cycling infrastructure" (paragraph 4.9, page 26). I agree. However, any development needs to ensure that this is not at the expense of pedestrian safety. I find that pavements are increasingly being used by</p>	<p>This key junction is an issue for pedestrians and cyclists and improvements supported by the SPD are needed to better link the town centre.</p>

			cyclists and people on electric scooters and this can be extremely hazardous. The development brief must endeavour to keep pedestrians, cyclists and motorised vehicles apart. Design Guide page 12 paragraph 3.25). I agree that the pavements along the High Street are unpleasant and ought to be improved. However, the document fails to mention that there is an important section of the pavement that is not wide. This is the pinch-point on the west side of the Edgware Road between Lidl and Whitchurch Lane.	
		Principle 4	I hope that the emphasis on preserving heritage assets is not being used as a sop to ease the passage of disastrous proposals for high-rise development in the middle of Edgware. 4.4.2 Paragraph 4.23 on page 29 states, "Edgware Town Centre within Barnet is identified by the Mayor of London as a tall buildings location, meaning there is potential for buildings higher than eight storeys, and for very tall buildings of over 14 storeys." I urge Barnet and Harrow Councils to resist this unreasonable and ill-conceived designation. Buildings of this height have no place in Edgware and will place intolerable additional burdens on the local community and infrastructure that are already under stress.	Edgware's heritage assets are highly valued and the councils would like to see them in good condition and sustainable uses that support the local community. Planning applications must take into consideration the context of heritage assets. The SPD references the need to retain the heritage buildings and to be sensitive to the nearby low-rise residential streets. Amend: strengthen SPD text to reference that redevelopment proposals must carefully consider the setting and context of heritage assets.
		Principle 4	I agree that the Railway Hotel is an attractive landmark and it would be a shame if it disappeared from the street scene.	The importance of the Railway Hotel as a landmark building is emphasised in the SPD.
		Principle 4	The listed buildings in the High Street are all that remains of old Edgware village. They give character to the street scene and help to make Edgware a nicer place in which to live and work. I am pleased that you have singled out the former White Hart Hotel for comment because this is the only one of Edgware's old coaching inns that still survives.	Edgware's heritage and history provide a unique and distinctive character that must inform the renewal of the town centre.

	Chapter 6	Public Realm Guide (Section 6 on page 45) to see what improvements are likely to be made to the street scene and found many that I can support. Paragraph 6.9 on page 46 states, "Along the southern part of the A5/ High Street the central reservation raised planted strip is not maintained and has a unkept [sic] appearance; unless it can be improved removal should be considered." I agree. It either needs to be planted with an attractive mix of shrubs and trees or removed. However, if it is removed, I hope a row of trees will feature in the replacement. The SPD seeks to "create a better sense of arrival in Edgware" (objective 4 on page 13) and this is an opportunity to smarten up the southern approach to Edgware.	Public realm improvements are vital to providing a more attractive and safer environment for the town centre.
	Chapter 6	I also agree with the statement in paragraph 6.12 that the example of tree planting already adopted in the eastern part of Station Road should be extended along the remainder of Station Road, Whitchurch Lane and the High Street.	More greenery will add greatly to the appearance and experience of people using Edgware Town Centre.
	Chapter 6	I am less enthusiastic about the provision of street planters (paragraph 6.14). While I like to see plants and flowers in public areas, planters require maintenance and are often the first amenity to suffer from budget cuts. If planters are to be made a feature of the street scene, care must be taken to ensure that they do not impede the safe passage of pedestrians.	Ongoing maintenance is vital for a better town centre over the long-term and is specifically referenced in the SPD.
	Principle 7	This includes the statement that "Edgware has a need to ... encourage the location of public sector service delivery hubs" (page 32, paragraph 4.45). I hope that if this aspiration is pursued there will be a joint provision of these facilities so that individuals and businesses in both Barnet and Harrow will benefit.	Comment welcomed.
	Principle 8	I agree that all development proposals should address the global crisis of climate change. Unfortunately, in my opinion the SPD, in advocating a high density	All major development are required to demonstrate accordance with Part L of the Building Regulations and London

			development in Edgware with high-rise buildings, will add to the problems of climate change rather than reduce them.	Plan policies SI2 and SI3 including compliance with the Mayor's net zero carbon targets.
		Principle 9	"Renewal and redevelopment require the participation of local communities and stakeholders to achieve success" (page 34, paragraph 4.50). I completely agree. Regrettably, many people in Montgomery Road were unaware of the development proposals until one of my neighbours circulated a letter to residents last week urging them to attend your next Zoom meeting. Maybe that reflects the fact that we are in Canons ward and only receive a passing acknowledgement in the SPD. We are very much affected by these proposals and have long-standing issues of parking, noise nuisance and anti-social behaviour associated with business premises in Whitchurch Lane. I hope that our views will be taken into account.	Public consultation was widespread and sought to inform a very wide range of stakeholders, including a leaflet drop to all addresses within 1km.
		Key Site - Broadwalk Centre and the Station	I have already expressed my dismay that the SPD advocates a development of high-rise buildings. I urge you to limit the height of any development within this site to six storeys.	Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs. The high levels of accessibility to public transport and town centre facilities reduce the need for car use.
		key Site – Forumside	Broadly support the proposals but I disagree with the statement that "south western areas [of the site] have more potential for height" (paragraph 5.30, page 42). In my opinion the height of any new buildings should not loom over the existing buildings on the street frontage. The trick will be to produce a workable design so that competing uses in close proximity (residential,	All proposals must show design that is appropriate to the context.

			commercial and Edgware School) can coexist satisfactorily.	
		Key Sites - Lidl and The Masons Arms	<p>This really is a key site in terms of its visual impact at the junction of the High Street and Whitchurch Lane. There is an opportunity to produce an attractive scheme that sets the tone on the approach to what is now the town centre in Station Road. The omens are not good. Up to now, developments along the High Street have made the southern approach to Edgware look more like a drab industrial estate. Even the frontage to the Lidl supermarket is characterless and depressing. So I would like the planning brief for this site to be imaginative and to complement the existing listed buildings. I recognise the point that is made in paragraph 5.33 that occupancy on the site will be intensified. However, it will be vital to ensure that the height of new structures does not overwhelm the existing buildings or the street scene. Also, spare a thought for the impact on the houses in Handel Way. This used to be a pleasant residential street.</p>	The design guidance sets out broad parameters for the sites; more detailed work will be provided through a planning brief or masterplan.
			Whitchurch Lane: the Madonna Haley Hotel opposite Montgomery Road now operates a Shisha Garden that attracts a young and boisterous clientele. I fail to understand why nightclubs have been permitted to operate here when they are in close proximity to residential streets and there is little or no offstreet parking for their customers.	The need for a safe evening economy is recognised in the SPD.
		Chapter 8	The SPD calls for higher densities of both residential and business use in the town centre and also for more "drinking out outlets" (page 54). I recognise that this is tempered by the statement that Edgware needs to "support growth in the evening economy, balanced with the need to avoid issues of anti-social behaviour" (paragraph 4.45, page 32), but unless incompatible uses are sufficiently separated, this will not only be miserable	The evening economy provides opportunities for socialising and leisure, as well as jobs. The planning framework acknowledges that the needs of residents must be full considered.

			for the people living there but it will also create a long-term problem for the enforcement agencies.	
			The former White Hart Hotel: applaud the inclusion of Objective 8 in the SPD. However, the way in which the former White Hart Hotel has been allowed to deteriorate recently does not bode well for the delivery of this objective. There used to be at least five coaching inns along the High Street in Edgware village but this is the last one still standing. I think it is shocking that the structure has been allowed to deteriorate. I hope the preservation and reinstatement of this building will be a priority. There is a footpath that runs through the site, continuing alongside the Edgware Brook until it emerges in Methuen Close. If the stated aims of the SPD are to be taken seriously, then a "pleasant, clean and safe" route should be devised for the people living on this estate to reach Edgware town centre. This could be a pleasant walk beside the stream and through an attractive seventeenth century building.	This is an important historic building and the planning framework fully supports its protection and being brought back into use.
22	Natural England	General	<p>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not relate to our remit to any significant extent. We do not therefore wish to comment.</p> <p>In principle SPDs should not be subject to the Strategic Environmental Assessment Directive or the Habitats Directive because they do not normally introduce new policies or proposals or modify planning documents which have already been subject to a Sustainability Appraisal or Habitats Regulations Assessment. However, a SPD may occasionally be found likely to give rise to significant effects which have not been formally assessed in the context of a higher level planning document. This may happen, for example, where the relevant high level planning document contains saved policies within a saved local plan which predates the need to carry out a SA or</p>	Comments welcomed.

			HRA and therefore no higher tier assessment has taken place. If there is any doubt on the need to carry out a SA or HRA a screening assessment should be carried out.	
23	Resident	NA	I agreed with everything Mr Stuart Cawthorne has said in his response to this consultation.	See responses to Item 21.
24	Resident	NA	I concur with and support every paragraph of Mr Stuart Cawthorne's response to the Draft SPD.	See responses to Item 21.
25	Resident	Chapter 1 And Objective 10 And Principle 6 – Deliver Community Facilities	Paragraph 1.26 on page 7 is far too weak and fails to address more than just the surface. For as long as I can remember, our health services, have been under immense strain. In the years since I move to Edgware, not only has the surgery in Manor Park Crescent closed but three local office blocks have been converted to residential use and at least 4 other major residential blocks have been built. More recently, so I understand, the Edgware walk-in centre has been closed, placing further strain on our existing GP surgeries. Under the circumstances, Developers must be forced to provide not 'be expected to support', and not just the items you mentioned, but also, telephones, water pressure, drainage, Internet, roads, parking - indeed the entire infrastructure required for each and every development, and to show how this has been calculated before any planning permission is granted. It is with this in mind that I turn to page 13 where the fact that it is only at that you begin to scratch the surface of this problem. This must be raised to a higher objective - it cannot be retrofitted.	Provision of community facilities is a key theme within the SPD but can be further strengthened Amend: strengthen wording in the Principle 6 to state that the renewal of the town centre should support and, where necessary, improve community facilities.
		Objective 12	The same comments apply - we have already seen the impact world-wide of climate change - if we are to make any sense of this development, this objective MUST come top of the list.	Climate change considerations are a key element in the SPD and the ordering of the objectives does not denote their importance.

		Chapter 3	Looking at the picture on page 21, I very much doubt that the vehicles shown picture a 1920's scene - more likely 1950's.	The image caption will be corrected. Amend: update Figure 12 caption to reference the mid twentieth century.
26	Resident	NA	I have been a resident in Edgware for 60 years and agree with all Stuart Cawthorne objections.	See responses to Item 21.
27	Chairman Canons Park Estate	General	Re-- Sky scrapers ---Regrettably there was insufficient consultation prior to the second and third tower block being built in the middle of the Broadwalk Centre 17 Floors high , even higher than Premier House which was built about 45/ 50 years ago as office space and recently converted to residential . To have these tower buildings sited within 1/2--1 acre of Land is dreadful, these buildings dominate the town, they can be seen from Stanmore, Mill Hill, Burnt Oak and all the entry roads to Edgware Station creating an eyesore. These buildings will accommodate about 300 families virtually 1000 people. We trust this new regeneration scheme is designed sensitively and does not have the same eyesore and dominating features and created with a design element rather than a concrete jungle. Your presentation in January indicated a number of buildings of 8 floors on the brownfield Lands. Developers seem to be focusing on the number of people they can squeeze into an area of say 4/5 acres, a commercial benefit. This should not be the criteria. During your Consultation Zoom meeting in January you had many negative objectors and rightly so. It was implied that a few minor adjustments might be made suggesting that the proposals which have not been shared with the community is virtually in stone. The tall buildings are a given (too late in the day) , everything else needs to be carefully considered .	Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.
		Chapter 3 Spatial Context	The catchment now embraces section of Edgware running down Hale Lane and Edgware going towards Burnt Oak and down Whitchurch Lane ,it completely	Agree that Cannons ward data should be added to the SPD.

		<p>Vision Objectives 1 and 2</p> <p>Principle 1 Renewal of the Town Centre and High Street as a Major Destination</p>	<p>The shopping centre should entice established retailers offering a range of fine products, this should be widened to accommodate small retail outlets for individual artists or craftsman encouraging a cottage industry. The area does not need 90% of restaurants, the high street is smothered with these outlets. Shops that offer a varied supply of goods and services. Easy transport, the bus station can be repositioned. We realise space is not a commercial investment however this is absolutely crucial. The regeneration can transform Edgware into an exclusive centre saving locals going to the west end or the city.</p>	<p>Edgware offering a diverse town centre experience, including a mix of shopping, leisure and culture. Eating out will provide a strong element within this as many people value the experience of using cafes and restaurants.</p>
			<p>The police or a private security team should be a feature in the area.</p>	<p>Improving the sense of security and safety is vital to the renewal of Edgware Town Centre, supported through better design and a cleaner, more pleasant street environment.</p>
		<p>Principle 4 Ensure High Quality Design and a Sensitive Approach to Heritage</p>	<p>At the consultation meeting, it was not confirmed what the Masons Arms and the Railway Hotel will be converted into?</p>	<p>The SPD strongly supports bringing the Railway Hotel and Masons Arms back into use; this could be as pub/ restaurant, or other uses that are beneficial for the community.</p>
		<p>Principle 1 - Renewal of the Town Centre and High Street as a Major Destination</p>	<p>There could be individual musicians who perform weekly or even once a month, the artist should be registered and approved by the organisers. It could be that local schools can display the works of students, arts, crafts, performances, provide places for community activities and leisure.</p>	<p>This idea is fully supported and should be part of the SPD. Amend: add reference to encouraging activities, exhibitions and performances by local community and artistic groups to bring people together and foster a sense of pride and inclusion.</p>
		<p>Principle 2 Improved Transport and Movement Options</p>	<p>There should be sufficient cycle lanes, sufficient Parking as now please confirm the present number of parking spaces and the numbers you are predicting, making consideration for several hundred additional residents. Developers should estimate the increased number of</p>	<p>Better cycle infrastructure will be part of Edgware's renewal. The high level of access to public transport and town centre facilities will reduce the need for car use for new residents. Car parking</p>

			people that will be accommodated in the scheme and coming into the area.	requirements will be assessed as part of the development process.
28	Metropolitan Police - Designing Out Crime Officer	Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	The report highlights ongoing concerns around crime and disorder at the rear of buildings, alleyways (eg. Church Way, Bakery Path) and within the public realm, briefly summarised in 1.28. As we identified within the environmental visual audit (EVA) and alluded to within your draft report, the designs of these alleyways are not ideal with long, narrow, winding pathways assisting crime and the fear of crime for legitimate users of these alleyways. A key Secured by Design (SBD) principle is to ensure that where a pathway is necessary, that these are as short, straight, wide and as well-lit as possible. They should also be devoid of potential hiding places and areas of concealment, with any provision for seating also carefully considered and avoided if possible.	Reducing crime and anti-social behaviour is vital to improving the experience for town centre users. Amend: referencing para. 4.24 to ‘Secured by Design’ approach.
		Chapter 1	It is very positive that section 1.31 includes and highlights one of the key aspects of the Barnet 2024 Corporate plan: Safe and strong communities where people get along well – tackling anti-social behaviour and environmental crime; a family friendly borough; support local businesses to thrive; focusing on the strengths of the community. The delivery of the Secured by Design scheme to both new and refurbishment projects within this area can greatly contribute towards this key aspect.	Comment welcomed.
		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	The benefits of Secured by Design, supported by independent academic research, has consistently proven that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage. It has also had a significant impact on anti-social behaviour (SBD - Homes 2019 guide).	Set out more clearly the benefits of Secured by Design within the SPD. Amend: include reference to the benefits of the ‘Secured by Design’ approach
		Objective 1	The application of Secured by Design, helping to influence the design of the built environment and by using proven crime prevention/reduction/target-	Comment welcomed.

			hardening measures can help to contribute towards a safer environment.	
		Objective 2	Secured by Design not only applies to residential dwellings but can also be applied to new commercial or refurbishment projects via our SBD 'Commercial 2015', 'Schools' guide and so on. With the incorporation of both physical security (target-hardening) measures and recommendations to the surrounding environment within site boundaries, this can help to prevent crime and disorder opportunities from potentially occurring.	Comment welcomed.
		Objective 6	With the inclusion of Secured by Design compliance for new build or refurbishment residential developments, this can help to contribute towards a safer and more secure environment, where communities can be allowed to flourish.	Comment welcomed.
		Objective 7	By applying Secured by Design to a development, this includes the need for the developer to incorporate physical security measures such as security-rated door/window-sets and so on that benefit from 'independent third party certification' from the fabricator of the product.	Comment welcomed
		Objective 9	Very similar to draft objective 1, by applying proven crime prevention methods at the design stage and with the application of Secured by Design measures at planning and through to completion, this can help to improve open and publicly accessible spaces. This includes assessing permeability, levels of activity and natural surveillance opportunities amongst other measures.	Comment welcomed
		Objective 10	With the different types of Secured by Design guidance and assistance from the local MPS Design Out Crime Officer (DOCO) at pre- application stage, planning and eventual SBD compliance and accreditation, this can help to enhance the safety and security for new or	Comment welcomed

			refurbishment projects and help to enhance the local community.	
		Objective 14	This objective is extremely helpful to aid the application of Secured by Design to new developments and to help shape the public realm. The services of an MPS DOCO are both free and impartial and this service is available to the local planning authority and those parties involved with relevant planning applications within this targeted growth area of Edgware.	Comment welcomed
		Objective 15	With an absence of crime and disorder within a local community, this can greatly improve the health and wellbeing of those in both the residential and commercial communities in Edgware. For instance, residents repeatedly targeted by anti-social behaviour may cause them such worry that it could lead to the use of medication, to help deal with the trauma that they could be experiencing. By designing out crime and disorder as early as possible and at the design phase, this could relieve a huge future burden on local services such as GP's, local authority services and so on.	Comment welcomed
		Section 3.1	Reflects some information regarding crime levels within the Edgware wards of both Barnet and Harrow. Burglary levels are high within each borough, whereby the local ward of Edgware (Barnet) recorded 147 burglaries within the last 12 months.	The information on burglaries will be changed. Amend: update Chapter 3 table to reflect that the prevalence of burglary within the Edgware area.
		Chapter 4	The Edgware SPD promotes a number of development principles, each helping to contribute towards sustainable development to help meet the needs of Edgware. These are clear and concise and will help to connect the local community together.	Comment welcomed
		Chapter 4	The early engagement of the LPA with key partners prior to this publication of this draft document is reflected within Section 4.51 and 4.52	Comment welcomed

		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	Having also been invited to comment upon the draft SPD for ‘The Burroughs and Middlesex University’ within Barnet, it was really positive for the inclusion of the extracts as copied below. It would be extremely useful if an addition such as those reflected within sections 4.3.7 to 4.3.9 of the draft SPD for ‘The Burroughs and Middlesex University’ could be considered and incorporated within the Edgware (growth area) SPD, to help address levels of crime and disorder within the local area.	More specific guidance will be added. Amend: within Principle 4 include text from ‘The Burroughs and Middlesex University’ relating to Security by Design
29	HADAS (Hendon and District Archaeological Society)	Chapter 3	Paragraphs 3.22 to 3.29 on the Historic Character and Heritage Assets of Edgware are admirable as far as they go but fail to deal with that part of the heritage that is buried. In Barnet, part of Edgware Town Centre is in an Archaeological Priority Area (called an Area of Special Archaeological Significance in Policy DM06e) as listed in Table 7.2 and shown in the Map at Appendix 1 of Development Management Policies 2012; the whole of the Edgware Road is the line of Roman Watling Street. In Harrow there is an Archaeological Priority Area named Edgware Village.	Information on the APAs should be part of the SPD. Amend: include reference to the Archaeological Priority Areas.
		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	The SPD must make it clear that in Barnet any development that may affect archaeological remains will need to demonstrate the likely impact upon the remains and the proposed mitigation to reduce that impact. This may mean that a condition is imposed on any planning application, requiring archaeological investigation before the development takes place. HADAS is not aware of the details of the regime in Harrow but it is likely to be very similar to that in Barnet. We ask for the draft SPD to be amended accordingly.	Update the SPD to reflect this feedback. Amend: include reference to the Archaeological Priority Areas and the potential need to carry out an assessment as part of a development proposal.
30	Resident	NA	I refer to the consultation on the project which, although it will have been running for six weeks from 11th January 2021 until 22nd February 2021, it has only just been brought to my attention and I am very concerned. I note	Extensive public consultation on the draft SPD was undertaken, including flyers delivered to all addresses within 1km of the SPD boundary.

			that there have been only two consultations - each lasting one hour but, due to the Covid situation, neither of these have been face to face. I am of the opinion that, on this basis, the matter should be adjourned for approximately twelve to eighteen months. This is mainly due to the fact that, going online to review this very complex matter, the average/lay person would not be fully able to understand the proposals, nor have a platform on which to challenge them.	Due to COVID-19 restrictions the two public consultation sessions were held online – these attracted a high attendance and participation.
31	Resident		<p>I am extremely concerned about the impact the proposed SPD for Edgware will have on the local area. Whilst Edgware centre needs regeneration it appears the main priority for the redevelopment is to meet the Mayor of London’s targets for new housing and new affordable housing and is not for the benefit of local residents. This translates into high density housing and tall buildings over 14 stories in the centre of Edgware.</p> <p>This is based on the fact that Premier House is already located in Edgware and Premier Place is being built. Both of these buildings are unattractive and not in keeping with the characteristics of the local area.</p> <p>High density housing over 8 stories (or even 5) would be totally not within the scale and character of Edgware and would adversely impact the area.</p> <p>There are brownfield sites in the centre of Edgware which can be used for redevelopment however the push to have high density housing which we were told in the online consultation would be “significant” will change the nature of the area completely and in a negative way.</p> <p>I urge you to limit the redevelopment to 5 storey buildings with proper provision for family living to ensure the nature of the area is preserved as is the welfare and safety of local residents.</p>	Edgware Town Centre contains brownfield sites which are identified for redevelopment, enabling a far better use of land that provides the environment, services and housing that the area needs. Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs. The SPD seeks a family-friendly environment that is safe for residents and visitors.
32	Residents		I am extremely concerned about the impact the proposed SPD for Edgware will have on the local area. Whilst	

			<p>Edgware centre needs regeneration it appears the main priority for the redevelopment is to meet the Mayor of London's targets for new housing and new affordable housing and is not for the benefit of local residents. This translates into high density housing and tall buildings over 14 storeys in the centre of Edgware. (see Edgware SPD p29 para 4.23 Edgware Town Centre within Barnet is identified by the mayor of London as a tall buildings location, meaning there is potential for buildings higher than eight storeys, and for very tall buildings of over 14 storeys...)</p> <p>Also Edgware SPD Design Guide para 5.17 Proposals for tall buildings should locate them in the heart of the site where there is more potential to establish a high-quality urban design that achieves higher densities). This is based on the fact that Premier House is already located in Edgware and Premier Place is being built. Both of these buildings are unattractive and not in keeping with the characteristics of the local area. This however is not in line with the Mayor of London's document on "London Living Spaces and Places" which says that high rise buildings should:-</p> <ul style="list-style-type: none"> • only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building • relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level; • individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London <p>High density housing over 8 storeys (or even 5) would be totally not within the scale and character of Edgware and would adversely impact the area.</p>	<p>Edgware Town Centre contains brownfield sites which are identified for redevelopment, enabling a far better use of land that provides the environment, services and housing that the area needs. Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs. The SPD seeks a family-friendly environment that is safe for residents and visitors.</p>
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			There are brownfield sites in the centre of Edgware which can be used for redevelopment however the push to have high density housing which we were told in the online consultation would be “significant” will change the nature of the area completely and in a negative way.	
33	Resident	NA	For text and response see item no. 32 above	For response see item no. 32 above
34	Resident	NA	For text and response see item no. 32 above	For response see item no. 32 above
35	Highways England	NA	Given that this SPD includes only local highways and transport matters, we have no comments or objections to this consultation. Therefore, we are satisfied that the outcome of this consultation will not materially affect the safety, reliability and / or operation of the Strategic Road Network.	Comment noted.
36	Avison Young	NA	We write to provide representations on behalf of the owners of 360 Burnt Oak Broadway, Edgware, HA8 5AN. We support the vision, objectives and principles set out within the draft SPD. However, there is a key opportunity for it to go further in planning for the appropriate growth of Edgware in recognising that the area that immediately surrounds the town centre also offers significant capacity and potential for redevelopment, particularly for housing. We therefore recommend that the Growth Area boundary is extended to include 360 Burnt Oak Broadway as it can be demonstrated that this suitable, available and achievable site meets the criteria for a Key Site which would assist in achieving the objectives of the SPD.	The SPD boundary is largely aligned with the town centre boundary. Renewal of the town centre will not be enhanced by extending the boundary to include 360 Burnt Oak Broadway.
37	Residents	General	We have seen how overcrowded Edgware has become in recent years and wanted to understand what new infrastructure was going to be put in place to alleviate this situation.	New development within Edgware must be supported by the community facilities needed to support that growth, as required by the SPD.

			<p>The main purpose of the plan is to insert mass ‘local affordable housing’ into Edgware via multi high-rise blocks blighting the skyline. It is only a few years since the 3 monstrous tower blocks at the north end of Green Lane were dynamited and replaced by the modern attractive housing estate in the area between Green Lane and Stonegrove. This shows what can be achieved with creativity and imagination to the benefit of all.</p> <p>How do these plans for high rise buildings comply with the Mayor of London’s London Living Spaces and Places which limits the occasions when high-rise buildings should be considered? Such buildings should not be where the character of the area would be adversely affected by such buildings’ scale, mass or bulk; Neither would placing such buildings in Edgware town centre comply with the requirement that they emphasise ‘a point of civic or visual significance where appropriate, and enhance the skyline and image of London’.</p> <p>Should the plans be revised to redevelop the area with low-rise buildings as has been done between Green Lane and Stonegrove, you will find local residents more supportive but all plans must include real plans to put more infrastructure in place per head rather than less.</p>	<p>Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
38	Sport England	Vision	<p>It is welcomed that the vision does expect that Edgware will be a healthy town centre as this entrenches health, wellbeing and physical activity aspirations within the entire document.</p>	<p>Comment welcomed.</p>
		Principle 4 – Ensure High Quality Design	<p>To assist developers and further inform the SPD Sport England recommend that the strong links between the SPD and Active Design are drawn out further in the document, particularly within the Principle 4 commentary that seeks to design in health and wellbeing. For instance, the SPD could have clear references to Active Design, its principles and the Active Design Checklist. Active Design principles and completing the</p>	<p>Enabling an active lifestyle and participation in sports support Edgware as a health town centre. Amend: Principle 4 include reference to Active Design and the checklist.</p>

			<p>checklist, for example, could be a requirement for development proposals. More information on Active Design, including the guidance, can be found via the following link; http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</p>	
		<p>Objective 10 And Principle 6 – Deliver Community Facilities</p>	<p>Sport England notes that Objective 10 and Principle 6 seeks to deliver/meet the need for community infrastructure. Although sport facilities are not specifically mentioned Sport England assumes that this Objective and Principle is intended to cover indoor and outdoor sports facilities as well as the other community infrastructure stated. Sport England would welcome reference to sport and recreation facilities in the commentary of this Objective and Principle so that it is clear to all. Sport England would also like to highlight that currently both Council's do not have up-to-date and robust assessments and strategies relating to indoor and outdoor sport provision, including playing fields/pitches, therefore it is unclear how the SPD could meet the supporting needs if these needs are unclear at this stage. Although the London Borough of Barnet are currently refreshing their assessment/strategies/evidence base relating to sport and physical activity the London Borough of Harrow have not and do not have an up-to-date and robust evidence for sport needs/demand that could inform any decisions. Sport England, therefore, strongly recommends that the London Borough of Harrow develop Playing Pitch and Built/Indoor Sport Facility Strategies to not only inform this SPD, but also sporting and planning needs/decisions throughout the borough to ensure that they are well-informed and robust. Sport England is happy to help with the process of developing this evidence base.</p>	<p>To ensure sports and active lifestyles are fully supported by the planning framework further text can be included. Amend: Objective 10 and Principle 6 to reference considering the need for sports facilities.</p>

39	Resident	General	How come we don't have a local cinema? I remember we had one in Edgware when I was a child. We don't all drive so getting to Borehamwood or Wembley is not ideal, plus neither of these are in the London Borough of Barnet. Is there any plans in the pipeline for one to be built close by?	A much-improved leisure and culture offering, potentially including a cinema, are prominent elements within the SPD.
40	Residents	NA	See item no. 37 above.	See response to item 37.
41	Resident		<p>In recent years, Edgware has already seen a massive increase in population due to new housing, which has led to the area becoming overcrowded and causing congestion in our streets. There has been absolutely no improvement to the infrastructure in order to align it with the influx of new residents into the area. The streets are very congested, there are limited parking spaces available, even for paid parking bays, and there has also been a substantial increase in crime in recent years.</p> <p>It appears that the main purpose of the plan in the Edgware SPD is to add affordable housing into Edgware with high-rise blocks. This will significantly impact the welfare and safety of the existing local community and impair the skyline of the area, not to mention the aesthetics of the town as a whole.</p> <p>I strongly object to the current plans where no thought whatsoever has been given to the local residents. The new blocks will impact Edgware's character and historic significance of being a safe residential suburban town. I urge you to consider the redevelopment of up to 5 storey buildings with full focus on family living. Furthermore, the general nature of the area must be preserved along with the well-being and security of the local residents, some of whom have been in the area since birth.</p>	New development offers the opportunity to improve and provide new infrastructure for the town centre. Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs. The planning framework seeks a mix of housing sizes and tenures, including affordable housing, to help people access the housing they need.
42	Resident	General	More CCTV cameras around the shops and also Station Road, particularly to deter anti-social behaviour and dangerous.	Security and safety features strongly in the SPD, including embedding of a secured by design approach to

			A fixed 20 MPH zone along Station Road, the busy stations of the High Street along the A5 and also parts of Hale Lane near the local Tesco's and Nat West. Speed cameras to re-enforce the 20 MPH zone, Raised bumps at all island crossing points along Station Road and parts of Hale Lane with red pedestrian priority crossing markings on the road and also traffic signs, thereby encouraging and warning drivers to drive more slowly and if necessary, to stop and give way to pedestrians.	development proposals. The need for security cameras is recognised. The need to provide an improved environment for pedestrians is recognised numerous times in the document.
43	Resident	NA	See item no. 37 above.	See response to item 37 above.
44	Resident	NA	See item no. 32 above.	See response to item 32 above.
45	Resident	Vision, Objectives 1 and 2 Principle 1 Renewal of the Town Centre	I have looked at the Edgware Town Center Economic Strategy document. Generally I am in agreement that there is a lack of flow and connectivity with no public space to meet apart from a few benches in the broadwalk. My concern is that the document does not give me much confidence of a strategy for a niche or element of differentiation that will give the town centre a uniqueness that will attract visitors and ensure they continue to return other than development of the Railway Inn (why has this never happened? - Could Barnet buy and develop the site as a community/art/leisure space?). Edgware can not compete with Brent Cross or Watford as a retail centre. No mention has been made of Mill Hill or Stanmore with their range of hospitality outlets (including national chains). Why are they more successful than Edgware?	Renewal of Edgware provides an opportunity to improve and expand the town centre offering. This is expected to include more leisure, cultural, community, shopping and eating out. The SPD provides a framework to help Edgware create its own identity and compete effectively with other north London town centres. This approach will include drawing on its unique heritage, location and community.
46	Resident	General	We were appalled when Premier House was built so we are shocked to find that far from its universal unpopularity serving as a deterrent against it's ever being replicated, the SPS includes many more such monstrosities. So we can only conclude that the wishes	Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that

			<p>and interests of the local community have been wilfully disregarded because one would have to be singularly ill-informed not to be aware of the strong local disapproval of Premier House in particular and of highrise buildings in general. In addition under the plans included in the SPD, Edgware would become even more congested, with even less parking space available. Given that the three polls carried out during the call clearly reflected the community's hostility to the SPD, I now look forward to a totally revised plan being drawn up which local residents can support.</p>	<p>the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
47	Resident	General	<p>I am extremely concerned about the impact the proposed SPD for Edgware will have on our local area. Whilst Edgware centre needs regeneration it appears the main priority for the redevelopment is to meet the Mayor of London's targets for new housing and new affordable housing and is not for the benefit of local residents. It appears that the main purpose of the plan is to insert mass local affordable housing in Edgware via multi high-rise blocks which will blight the skyline. It is only a few years since the 3 monstrous tower blocks at the north end of Green Lane were demolished and replaced by the modern attractive housing estate in the area between Green Lane and Stonegrove. This shows what can be achieved with creativity and imagination to the benefit of all. We strongly object to the current plans where no thought whatsoever is being given to the local residents. For decades, Premier House has been an eyesore but at least it was isolated. The SPD plans will be the death knell of Edgware's shopping high street with the shopping experience likely to fall below that experienced in shopping centres of Golders Green, Hendon or Watford. How do these plans for high rise buildings comply with the Mayor of London's London Living Spaces and Places which limits the occasions when high-rise buildings</p>	<p>Renewal of the town centre through an improved environment and better offering of leisure, culture and shopping, will enable Edgware to compete through providing a unique offering and experience. The Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>

			<p>should be considered? Such buildings will adversely affect the character of the area due to their scale, mass or bulk; Neither would placing such buildings in Edgware town centre comply with the requirement that they emphasise 'a point of civic or visual significance where appropriate, and enhance the skyline and image of London'. Should the plans be revised to redevelop the area with low-rise buildings as has been done between Green Lane and Stonegrove, you will find local residents more supportive. A key metric that should be observed in the redevelopment plans is that the infrastructure per head supporting the planned no. of residents in Edgware should be at par or increased from the level prior to the development. Over the years, we have seen the population density increase but the infrastructure supporting the area such as parking and policing appears to have remained the same.</p>	
48	Resident	General	<p>Whilst the regeneration of Edgware town centre is desperately needed this should be in a way that enhances the benefits of living in this beautiful suburb and not in a way that is likely to destroy its atmosphere and skyline. I therefore am writing to urge you to rethink the plan to build a number of high rise blocks of flats in the centre and to add another three floors to an already 17 floor block currently under construction. In addition to the impact that these will have on the environment and the 'country' feel that is so special to Edgware, the influx of residents will also strain key services potentially to breaking point.</p>	<p>Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
49	Resident		<p>My comments relate to the Draft Design Guide in particular. Edgware Town Centre can certainly benefit from improvement and some taller (maybe 5,6 or even 7 storey buildings) may be appropriate. Spaces between buildings must be most carefully considered - the SPD</p>	<p>More sustainable transport options are supported by the SPD to provide a much improved environment for pedestrians, cyclists and people using public transport. Car parking for town centre users will be provided through</p>

		Design Guide	<p>mentions access to views and sunlight and this should be prioritised for any new dwellings. The spatial quality of dwellings is also important, not just adhering to minimum standards, working from home should now be considered as a factor for some dwellings.</p> <p>3.14 Should 'Edgware Lane' read "Edgwarebury Lane"?</p> <p>4.2 Although, as locals, we recognise the locations, pictures should all be titled.</p> <p>6.10 No 'y' in Church Walk.</p> <p>Assuming there is still to be a supermarket, the reality is that people will still want to use their cars, though, hopefully more electric vehicles, maybe more sharing. Parking will need to be provided and the design of car parking is also very important if it is able to contribute to an improvement for the Town Centre.</p>	<p>more efficient designs, for example basement or podium parking.</p> <p>The Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p> <p>Amend: correct typos in paras 3.14, 4.2 and 6.10.</p>
50	Resident	General	<p>Happy for redevelopment, very against the skyline being filled. Lower density not tower blocks. Good quality family homes please that can be supported by the existing infra structure and not strain already struggling services. Some consideration to the style and scale of the architecture of the area rather than using blocks that were pushed through without the appropriate consultation as a precedent to ruin the skyline, aesthetic and quality of life of the local residents.</p>	<p>Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
51	Resident		<p>I am concerned by high rise developments which will ruin the skyline and increase densification to unsustainable levels.</p> <p>A new cinema was promised on the site of the broad walk car park when the previous cinema was knocked down on Manor Park Crescent and we are still waiting 20 years later.</p> <p>The high street needs regeneration and encouraging to avoid just being charity and betting shops.</p>	<p>A much-improved leisure and culture offering, potentially including a cinema, are prominent elements within the SPD. The planning framework encourages a broad renewal and improvement of Edgware's environment and town centre experience.</p>
52	Resident		<p>I would agree that Edgware town centre requires renewal, with an improvement in the quality of shops,</p>	

			<p>renewal of heritage sites such as the Railway Hotel and the Mason Arms, green communal spaces and an improvement in the quality of shop signage. It is noted by residents of and by visitors to Edgware that the town has been "going downhill" in the last 10 years. Please could Barnet Council consider the following:</p> <p>1) Edgware is a suburban town. Any development for housing should reflect that and should not be high density as it puts pressures on public amenities, in particular Tube spaces, schools, nurseries and hospital facilities. It also impacts the sense of Edgware being a leafy suburb, so new/regeneration developments should be low rise (less than 5 storeys), sensitive to the heritage of Edgware and not high density (not a mass of flats, in particular it cannot replicate Premier House). Emphasis should be on quality and not quantity.</p> <p>2) There should be a focus on green, communal spaces with both trees and also greenery at eye level and ground level (shrubs and grass, rather than a lot of hard surfaces).</p> <p>3) High quality shops, restaurants and leisure facilities should be encouraged, with appropriate frontage. The recent renovations of Nationwide building society and Izgara restaurant are good examples of appropriate signage and frontage. Many shops have poor quality signage and frontage. There are also too many discount, charity, and pay-lending shops, nailbars/tanning shops and betting shops. A better mix of quality retail and leisure should be encouraged with a focus on presentability to encourage frequent family footfall.</p> <p>4) The council should ensure sufficient and frequent refuse collection of public bins to ensure a pleasant experience when moving through public spaces and reduces the likelihood of fly-tipping.</p>	<p>Providing a much improved town centre environment, including more attractive and cleaner streets and new green spaces, are vital to the renewal of Edgware. It is a Major Town centre and the SPD supports this in terms of maintaining retail, food outlets, offices, and other town centre uses. Delivery of new housing is also an important element in redevelopment of Edgware. The town centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
53	Resident	NA	For response text see Response no. 52 above.	See response to item 52.

54	Resident		<p>There is no doubt from the meetings, that everyone agrees that Edgware town centre needs regeneration and improvements. However, there is one specific area that we take strong objection to as did the attendees at those meetings.</p> <p>Edgware now has a 17 storey tower block under construction. It is overbearing on the whole area and can be seen for miles around. This is an outer London suburban area and all the surrounding buildings are at a far lower level in keeping with the district. This ugly giant block should not have received permission as it is completely out of character for the area, but it is too late now. Worse is that the owners are now attempting to get permission to make this tower block into 20 storeys high! We do hope that this will be refused. I believe if the Barnet council planners are truly interested in Edgware regeneration, they will add to the SPD a limit to the height of any further developments which is in keeping with surrounding buildings in Edgware and not permit any further tower blocks. Tower blocks concentrate large numbers of people in a very small area and the result of overdevelopment include:</p> <ol style="list-style-type: none"> 1. Overstretching facilities such as schools and doctor surgeries 2. Loss of a sense of community & pride in the area which increases anti-social behaviour, crime, litter, pollution etc. 3. Causes irreparable damage to Edgware as a suburban area by changing the skyline from existing lower building heights associated with outer London suburbs to overbearing 20 storey high tower blocks associated with city centres. <p>For the above reasons, tower blocks will become the slums of the future and it is noteworthy how those 1960's blocks at the top of Stonegrove near Canons</p>	<p>Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
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			corner were demolished and replaced with a pleasing suburban lower level development.	
55	Resident	NA	For response text see Response no. 52 above.	See response to item 52
56	Resident	NA	For response text see Response no. 52 above.	See response to item 52
57	Resident	-	<p>The cost of the proposed works to improve Edgware are not costed and identified. The impact of the appearance of the proposed development on the surrounding area is highly understated</p> <p>The Edgware Town Centre Framework published in June 2013. The approach of the SPD is that all the work and its content were irrelevant. Perhaps in eight years' time the same will be said of this SPD. The point is that when the Framework was published it was considered by its authors to be the correct approach. Why are the councils sure that this SPD document will not be considered in the future to be equally misguided?</p> <p>The Economic Strategy document was prepared for TfL, who have a vested interest and therefore not impartial Little attention has been paid to previous survey.</p> <p>The car parking proposals are wholly unrealistic both for the developed properties and the loss of spaces used by commuters as well as shoppers</p> <p>The reference to the provision of a "heritage quarter" appears to be meaningless and something invented by marketing teams rather than based on reality.</p>	<p>The economic circumstances within Edgware Town Centre have changed since the 2013 document was prepared, with increased pressure on retailers, and greater demand for new housing. The Economic Strategy provides some of the evidence of the changing town centre needs and pointers as to the direction which the town centre could take.</p> <p>Car parking for town centre uses will be provided, albeit more land efficient designs will be sought.</p> <p>The Railway Hotel listed building context must be considered by proposals, with the potential for a 'heritage quarter' offering a realistic and interesting approach.</p>
58	Resident	Chapter 3 Spatial Context, Heritage	<p>The area covered by the SPD appears to contain two areas of Special Archaeological significance which do not appear to be reflected in the document. This needs to be rectified. The text from the 2007 document on LBB Areas Archaeological Significance by the greater London Archaeology Advisory Service is reproduced as is an extract from the online UDP map which I believe is the extant Local Plan map.</p>	<p>There should be reference to the APAs and the SPD will be updated.</p> <p>Amend: update to include areas the Archaeological Priority Area.</p>

		<p>Chapter 3 Spatial Context, Heritage</p>	<p>Edgware is mentioned in the Domesday Book but under the parish of Stanmore and formed nucleated villages within the forested area until the 13th century. There is no Edgware manor mentioned in the Domesday book, but there may be a farmhouse, recorded since 1216 AD. However, this is probably located at Edgwarebury (ASAS 10). Agriculture developed in the 16th century which was quite mixed and it became a small market in the 17th century. In 1862 AD it was said that the market town had disappeared. Industry had little impact on Edgware's economy, but it is likely that there were gravel pits being worked from 1802 AD continuing into the early 20th century. This ASAS consists of two sections:</p> <p>(a) Hale Lane (eastern area): In the area next to Hale next to Hale Lane, there is evidence of a mediaeval farmhouse (1294 AD), with 13th/14th century pottery sherds. Evidence here also suggests post-mediaeval development, including pottery sherds and 19th century landscaping.</p> <p>(b) Watling Street (western area)</p> <p>(c) A mediaeval settlement developed along the Edgware Road next to Edgware Brook. Edgware is a Saxon name, originally 'Aeges Weir'. This was so called because there would have been a nearby dam or weir constructed for the Silk Stream and Deans Brook for fishing or irrigation (the latter is mentioned in a charter of 972-8 AD). The church of St. Margaret is located here which had a tower dating to the 14th century. In 1370 AD, the Prior of St. Bartholomew's, Smithfield had land holdings in Edgware. Edgware Bridge is located here crossing the Edgware Brook, which is evident on a map from 1597 AD. A bridge was first mentioned in 1370 AD, called 'Eggewerebrigge'. A History of the County of Middlesex: Volume 4 (Victoria County history, 1971)</p>	<p>The additional detail is appreciated, however, the SPDs historical context information is aimed to provide an overview of the areas development and - notwithstanding the amendments set out in this schedule - is considered to be sufficient.</p>
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		Principle 5 - Improved Environment and New Public Spaces	<p>I would support the emphasis on provision of good quality, well maintained open spaces throughout the development. In addition I would ask that the SPD reflects the Mayor of London's Public London Charter principles for any privately owned open spaces.</p> <p>I would also like to see a clearer commitment for the long term maintenance of all open spaces and facilities created through these developments given that lack of maintenance and investment across much of the existing parks and green spaces network is a cause of Borough wide concern. There are a number of mechanisms through which this could be achieved and it would be helpful if these were set out in the final document.</p>	<p>New green spaces are a priority for Edgware Town Centre and ongoing maintenance will be key to their long-term success. Amend: additional bullet point to ensure plans are in place for the long-term maintenance of the public and open spaces with the Edgware SPD area.</p>
59	Resident		<p>These meetings were poorly attended due to a lack of publicity! I am sure there would be more than 100 people interested in this matter!</p> <p>While I welcome the regeneration of Edgware I am Very unhappy about the prospect of high rise buildings which are completely against the character of Edgware as I have known it for 40 years!</p> <p>I and lots of other people living here would prefer to Keep the character of Edgware as a quiet town with nice restaurants cafes with outdoor sitting areas and good commercial Centre with ample parking (not everybody lives within walking distance of the underground and the shops) . At my age I cannot bicycle with my shopping from Sainsbury and the centre to my house!</p> <p>Under the pretence of renovation this project will only add hundreds of flats and tenants with no additional Facilities like doctors, communautés facilities etc. Where all these people will park their cars?</p>	<p>The online consultation events received a significant level of publicity and attendance was high at both events.</p> <p>Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
60	Resident		<p>I agree that Edgware town centre requires renewal, with an improvement in the quality of shops, renewal of heritage sites such as the Railway Hotel and the Mason Arms, green communal spaces and an improvement in</p>	<p>Renewal and improvement of the Town Centre is multi-faceted and requires an improved environment, new commercial opportunities, and delivery</p>

			<p>the quality of shop signage. Edgware town centre has been in decay for a number of years, a trend accelerated by the Broadwalk Centre, the financial crisis and most recently the Covid-19 lockdowns. However, I object to a central tenet of the plan, tall tower blocks. Edgware is a suburban town, a leafy suburb . Housing development should reflect that and should not be high density as it puts pressures on public amenities, in particular Tube spaces, schools, nurseries and hospital facilities. New/regeneration developments should be low rise (less than 5 storeys), sensitive to the heritage of Edgware and not high density (not a mass of flats, such as Premier House). Emphasis should be on quality and not quantity and anything that resembles the new, ugly, skyline in Colindale must be avoided.</p>	<p>of community facilities. Change and growth includes new housing and a more intensive use of the town centre. This area is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>
61	Resident		<p>I feel that any development has to be in keeping with the surrounding areas, which are primarily low density semi detached , or detached houses. This is the reason that the majority of people were attracted to Edgware in the first place.</p> <p>I believe there is a lot of scope for development of brownfield areas, for the benefit of the whole community without any further need for high level buildings. I think that 2 tower blocks is already over generous, also the additional recent conversion of the office block adjacent to Edgware Primary School. This does not seem to have been beneficial to the whole community, as it appears to make the area run down.</p> <p>I am concerned that any future development must meet high standards of health and safety, and be of Long term quality for the community of Edgware, not just for the developers.</p> <p>I had an idea for the use of the Railway Hotel Building, I was thinking that this could become a major attraction and benefit for Edgware. I was thinking that it could have</p>	<p>Edgware Town Centre contains brownfield sites which are identified for redevelopment, enabling a far better use of land that provides the environment, services and housing that the area needs. The Railway Hotel is recognised as neglected and the SPD strongly supports bringing this heritage asset back into a suitable use. Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.</p>

			a multi use, as a museum for model railways, and engineering, and building. Perhaps it could also house a small hotel, or restaurant.	The SPD seeks a family-friendly environment that is safe for residents and visitors.
62	Resident		The proposed Edgware plan copies Mill Hill and Colindale. Massive blocks of flats with limited outside space. Covid 19 changes our world. People need houses with gardens not sterile sixties style slums of the future.	Redevelopment must deliver new green and open spaces to the town centre.
63	Historic England	Chapter 3 Spatial Context, Heritage	The SPD refers to the Edgware High Street Conservation Area in the table on page 22, but does not mention the Watling Estate Conservation Area, the Cannons Park Conservation Area or Canons Park Grade II Registered Park and Garden. They are all designated heritage assets that have the potential to be impacted upon and the SPD should be revised to refer to these and ensure that their setting is taken into account.	Reference to heritage assets adjoining the SPD boundary should be included. Amend: update to include reference to the Watling Estate Conservation Area, the Cannons Park Conservation Area and Canons Park Grade II Registered Park and Garden.
		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	The SPD makes no reference to the setting of heritage assets generally, nor to archaeology.	The setting of heritage assets is an important design consideration and should be referenced. Amend: update text to state that redevelopment proposals must carefully consider the setting and context of heritage assets.
		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	Paragraph 4.23, page 29 – states that the London Plan identifies the town centre as suitable for tall buildings and gives a prescribed height; however, the emerging London Plan does not identify it as an area for tall buildings. Instead, boroughs are required to set their own definitions for what constitutes ‘tall’. This paragraph should be revised to reflect the emerging London Plan.	Amend: update text to state that the Local Plan identifies Edgware as a tall building location.
		Chapter 5 Key Sites Design Guide	The key opportunity sites should not be included in the SPD; this is premature until the Local Plan is found sound. The inclusion of sites goes well beyond the scope of what a non-development local plan can do in the absence of a corresponding adopted local plan. We agree that the	The inclusion of these sites is indicative, providing guidance further to the identification of these sites within the Draft Local Plan. Heritage, context and

			sites do have development potential, but presently there is no evidence to show to what extent they can be developed. While the Reg 18 Local Plan Site Selection Background Paper is helpful it does not show how heritage was factored in. In addition the SPD may require and SEA if it precedes the Local Plan. The sites could be added into the SPD as a revision after the plan has been adopted. Only sites that are already allocated under the adopted plan could be included.	environmental considerations are covered by the Draft Local Plan.
		Chapter 5 Key Sites Design Guide	The area has a lot of regeneration potential and could accommodate higher buildings if they are carefully considered in design and heritage terms. However, as the SPD does not properly consider the heritage assets that could be impacted on. We would expect this type of evidence to be compiled in support of the sites allocated in the Local Plan. Given that the Local Plan is in its early stages it may be the case that is evidence will be forthcoming.	The Local Plan designates Edgware as a location potentially suitable for tall buildings location. To be acceptable proposals must ensure high quality design and fully consider the context, including of heritage assets.
		Design Guide Document	It is not clear if the Edgware SPD Design Guide forms part of the consultation. It is listed as a supporting document so it is assumed it is not part of the consultation and so we have not commented on it. We support the production of area-based design guides and look forward to being consulted on this in due course.	The Design Guide was prepared to inform the SPD.
64	Resident	NA	For response text see Response no. 32 above.	See response to item 32.
65	Resident		I agree that Edgware town centre requires renewal, with an improvement in the quality of shops, renewal of heritage sites such as the Railway Hotel and the Mason Arms, green communal spaces and an improvement in the quality of shop signage. Edgware town centre has been in decay for a number of years, a trend accelerated by the Broadwalk Centre, the financial crisis and most recently the Covid-19 lockdowns. However, I object to a central tenet of the plan, tall tower blocks. Edgware is a	Improvement of the Town Centre is multi-faceted and requires an better environment, sensitive renewal of certain heritage assets, new commercial opportunities, and delivery of community facilities. Change and growth includes new housing and a more intensive use of the town centre. This are is identified by the Local Plan as

			suburban town, a leafy suburb. Housing development should reflect that and should not be high density as it puts pressures on public amenities, in particular Tube spaces, schools, nurseries and hospital facilities. New/regeneration developments should be low rise (less than 5 storeys), sensitive to the heritage of Edgware and not high density (not a mass of flats, such as Premier House). Emphasis should be on quality and not quantity and anything that resembles the new, ugly, skyline in Colindale must be avoided.	an area potentially suitable for tall buildings - the SPD and other planning documents require that the design must be of excellent design and demonstrate an appropriate relationship with other town centre buildings and the surrounding low-rise suburbs.
66	Resident	NA	See item no. 65 above.	See response to item no. 65.
67	Barnet Borough Arts Council	Principle 1 - Renewal of the Town Centre and High Street as a Major Destination Principle 5 - Improved Environment and New Public Spaces	I write as Secretary of BARNET BOROUGH ARTS COUNCIL which links individuals and societies the borough and aims to promote the arts through BARNET ARTS MAGAZINE and festivals. Most of our member societies are based on the eastern side of the borough. In or near Edgware are The Good Companions, a drama group producing a pantomime and other productions in their excellent venue at John Keble Church in Hale, the nearest art society is Milldon who exhibit at Holy Trinity Church in Mill Hill, and musical shows are presented in St Michael's Church in MILL Hill which also houses the Pro Arte Choir. There's very little in Edgware, although the library is an oasis. We suggest local festivals can act as focal points, and there seems little floral or horticultural activity and these might be good starting points in the spring and autumn on stalls.	Drawing on Edgware's local artistic and cultural organisations can play a key role in renewal of the town centre. Amend: add reference to encouraging activities, exhibitions and performances by local community and artistic groups to bring people together and foster a sense of pride and inclusion.
68	NHS HUDU	General	The Edgware Growth Area SPD presents an important opportunity to revitalise the town centre, introduce a significant amount of new housing supported by social infrastructure, including healthcare in a highly accessible location. The impact of development will extend beyond GP surgeries and includes community and hospital services. The strategy in North Central London is to ensure that infrastructure supports integrated health and	Ensuring good social infrastructure, including healthcare, is a vital element of renewal.

			care services. This includes a wider range of services provided by a multi-disciplinary workforce across a network of GP practices and community services.	
		Principle 3 – Enable Diverse Housing Delivery	Under Principle 3 (enable diverse housing delivery), we note that the Barnet’s emerging new Local Plan will establish a future housing capacity for the town centre. This should also include Harrow Council’s emerging Local Plan as one of the Key Sites, Lidl and The Masons Arms, identified in the draft document is in Harrow.	The boroughs will each set out their own housing targets and locations for delivery within their borough boundaries.
		Principle 6 – Deliver Community Facilities	We support the Development Principles, including Principle 6 to deliver community facilities. However, we suggest that the principles refer to health and wellbeing to reflect the vision to promote Edgware as a healthy town centre. As Objective 15 implies health and wellbeing is a cross-cutting theme which requires a holistic policy response.	The health and wellbeing objective is reflected within the Principle 6.
		Principle 6 – Deliver Community Facilities	In response to Barnet’s Draft Local Plan (Regulation 18) consultation the CCG noted that Policy GSS05 ‘Edgware Growth Area’ identified a potential new housing capacity of 5,000 homes. This scale of development will require new healthcare infrastructure and we would welcome the opportunity to work with both Councils to identify future requirements and site opportunities to deliver new and improved infrastructure. This is endorsed under Principle 6 to deliver community facilities, including healthcare.	Barnet is preparing an Infrastructure Development Plan to set out the borough’s requirements over the Local Plan period. Proposals within Edgware must demonstrate how the healthcare requirements for the new developments will be met.
		NA	Draft Local Plan site No 27 ‘Edgware Town Centre’ includes the Old Redhill Clinic in Station Road and there is an opportunity to redevelop or re-provide the medical centre taking a holistic view of all public sector assets and opportunities in the growth area. Paragraph 8.8 notes that Transport for London is the largest public landowner.	Redevelopment of this area will provide an opportunity to consider re-provide medical facilities in suitable and well-located premises.

		NA	Development in the Growth Area will also impact on future plans for Edgware Community Hospital to the south. Barnet's draft Local Plan (Regulation 18, January 2020) identifies the community hospital site (No 5) as a site with development potential with an opportunity to consolidate services and release some land for housing.	Edgware Hospital is identified within Barnet's Draft Local Plan Schedule of Sites.
		Chapter 8 Delivery and Implementation Section 106	In terms of delivery and implementation we support paragraph 8.18 which sets out the infrastructure priorities for the growth area, which includes community facilities including for education, nursery provision and health facilities. We suggest that the document clearly refers to the role of section 106 planning obligations to mitigate site-specific impacts which could include both financial and 'in kind' contributions towards healthcare. This could include improvements to existing premises to increase capacity or supporting the new delivery of new facilities.	Amend: include reference to the role of S106 obligations to mitigate site-specific impacts which could include both financial and 'in kind' contributions.
		Chapter 8 Delivery and Implementation	The text will need to be updated to refer to the role of the Infrastructure Funding Statement (CIL Regulation 121A) which has replaced the Regulation 123 List and identifies the infrastructure required to support development in an area and how it will be funded, using Community Infrastructure Levy, or section 106 obligations, or a combination of both. We would welcome the opportunity to work with both Councils to identify the healthcare infrastructure requirements and timescales and funding and delivery options.	Acknowledge that the text should be updated. Amend: update to reference the Infrastructure Funding Statement (IFS) and the Planning Obligations SPD.
		NA	The draft SPD addresses other issues which will impact on health and wellbeing, including air and noise pollution, active travel, open space deficiency and opportunities, employment opportunities, unhealthy town centre uses and the impact of climate change. To tackle these issues in a holistic way, we suggest that a health impact assessment is submitted with large development proposals to ensure that measures are introduced to	As noted by the response, Health Impact Assessments are required on larger developments by the councils Local Plans.

			mitigate the negative impacts of developments and maximise health benefits. It could also consider the longer-term health and wellbeing implications of Covid-19 in terms of travel, changing working patterns and demand for office space, the future of town centres and design of buildings and spaces. We note that the Barnet's draft Local Plan Policy CHW 02 'Promoting health and wellbeing' supports the use of health impact assessment for larger developments.	
69	Savills (on behalf of The Ballymore Group and Transport for London Commercial Development (TfL CD)	Chapter 1, Strategic Context	We are generally supportive of the document and its ambition. In the same vein, it is our view that the SPD must go further in recognising Edgware's role in helping meet LBB's and London's housing need. This should be done by greater explanation of the significance the Major Town Centre and how the key sites within the design guidance can embrace such designation. To assist in demonstrating this potential, LBB should further consider adopting a more visual approach to the SPD which provides impressions/overlays on the key sites illustrating what these sites could look like in the context of their local and regional planning policy designations.	The requirement to provide housing to meet the boroughs targets is covered in the Strategic Context section. The SPD provides a framework for development and would be too inflexible if more specific design guidance were included. More detailed images and drawings will be provided through the masterplan and application processes.
		Chapter 1, Strategic Context	The London Plan makes clear at paragraph 1.2.5 that using the city's land more efficiently will need to include the redevelopment of brownfield sites and intensification of existing places, including in outer London. In order to meet the city's housing needs, Policy H1 in the London Plan instructs boroughs to optimise the potential for housing delivery on sites with high public transport accessibility and proximity to stations and within town centres. Table A.1 of the London Plan outlines that Edgware has high residential growth potential. The SPD makes reference to this strategic context (paragraphs 1.13-1.15). However, it ought to	The strategic context can be expanded to clarify the Mayor's approach. Amend: update to reference the Mayor's Good Growth Principles that underpin the approach in Edgware Town Centre, in particular Policy GG2 Making the best use of land, which expects application of a design-led approach to determine the optimum capacity of sites. A high density approach in Edgware Town Centre is a sustainable way of meeting the boroughs growth needs while

			<p>emphasise that high density development in Edgware town centre is a sustainable response to meeting London’s growth needs while also protecting the Borough’s Green Belt as set out in the London Plan.</p> <p>There are a number of good growth objectives, one of which is making the best use of land (GG2) achieved in part by applying a design-led approach to determining the optimum development capacity of sites and, promoting higher density development in locations well-connected to jobs, services and public transport. It is our view that the SPD can be a positive response to this strategic framework but that it should be clearer and more direct in its ambition.</p>	protecting precious green spaces, including Green Belt.
		Chapter 1, Strategic Context	The London Plan provides the strategic policy context for the Council’s identification of Edgware as a growth area capable of accommodating substantial growth including the thousands of new homes that the SPD rightly seeks to deliver. This relationship between regional and local policy ought to be emphasised in the introduction to the SPD in both the text and through diagrams.	Reference to thousands of new homes is made in Objective 6, making clear the potential within Edgware Town Centre.
		Principle 3 – Enable Diverse Housing Delivery	Paragraph 4.20, paragraph 5.15 - in line with Figure 31 the core of the centre is the shopping centre and station site and this site is identified as having “higher development potential” and represents the largest higher development potential segment in the SPD area. The text in both paragraphs therefore ought to recognise that the core of the centre should accommodate the “thousands” of new homes needed as referenced in Objective 6 of the SPD.	Reference to thousands of new homes is made in Objective 6. paragraphs 4.20 and 5.15 reference high levels of housing delivery within SPD, providing an appropriate and flexible description to achieve the quantum of growth within Edgware.
		Chapter 5 - Key Sites Design Guide, Broadwalk Centre and the Station	The Broadwalk Centre and Station site is the largest town centre site with high development potential and identified in the draft Local Plan as having capacity for over 4,000 new homes. This level of new housing would need to be accommodated in a number of tall buildings,	Amend: update text to reference tall buildings in the plural.

		Para 5.19	not just one. Paragraph 5.19 should therefore be amended to state: <i><u>"potential for the creation of a modern urban environment with opportunities for tall buildings and higher densities in some parts..."</u></i>	
		Chapter 5 - Key Sites Design Guide, Broadwalk Centre and the Station Figure 36	While figure 36 seeks to depict the figure ground plan, it suggests houses along Brook Avenue sit hard up against the boundary of the redevelopment site which is not accurate given the presence and buffering effect of the railway. We would suggest therefore that this diagram be amended to include the railway. Similarly, figure 31 currently shows the boundary of the shopping centre/station development segment extending over the railway and could also be amended to reflect that the railway will provide a buffer between the site and houses to the north east.	The site boundaries are consistent with those set out in Barnet's Draft Local Plan Schedule of Sites. Text will be added to indicate the buffering effect of the railway infrastructure, as set out in the response to Paragraph 5.20 below.
		Chapter 5 - Key Sites Design Guide, Broadwalk Centre and the Station	While we agree that development of the site ought to respond to its immediate context, particularly at its edges, the SPD ought to clarify what it defines as the east and southern edges. The site is bordered to the north east by the railway which provides a buffer of approximately 76m from the edge of the site to the rear gardens on Brooke Avenue. This separation afforded by the railway together with proximity to the station makes this part of the site suitable for taller buildings. A tapering down to lower heights is more appropriate to the south to respond to existing low rise development around Parkfield Close and Fairfield Crescent where the SPD should recognise that the existing tree line will assist in screening new development. The first bullet point of paragraph 5.20 should therefore be amended as follows: <i><u>'Towards the southern and eastern edges...the height and massing of buildings must should respond to the suburban context.'</u></i>	To provide more clarity and direction on the siting and context for development proposals the bullet point will be updated. Amend: update text as follows- 'towards the southern and eastern edges where the site is in proximity to low-rise residential areas – notably Parkfield Close and Fairfield Crescent and Brook Avenue – the height and massing of buildings must should respond to the suburban context. <u>Proposals must also carefully consider the setting and context of heritage assets in the surrounding area, such as the Railway Hotel. Along the eastern boundary the railway lines provide a buffer to residential areas, although the raised topography of the site must</u>

			<p>While we agree that good design should avoid undue loss of lighting and privacy to neighbours, we note that through high-quality design and various design measures it is possible to mitigate against impacts such as overshadowing or loss of privacy, even in schemes comprised of tall buildings wording of this The first bullet point in paragraph 5.20 sentence should be amended as follows:</p> <p><i><u>'The height of new development should be considered in the context of its impact on overshadowing and loss of privacy which will themselves need to be assessed in the context of Edgware as appropriate for an urban town centre be sufficiently modest as to avoid overshadowing and loss of privacy.'</u></i></p>	<p><u>be a design consideration.</u> The height of new development should be <u>considered in the context of its impact on sufficiently modest as to avoid</u> overshadowing and loss of privacy.</p>
		<p>Chapter 5 - Key Sites Design Guide, Broadwalk Centre and the Station</p>	<p>The second bullet point of paragraph 5.20 - the SPD provides no definition of the site's "heart" or indication of where this is located. Notwithstanding, both the buffering effect of the railway and the location of the Underground station provide sound urban design reasons for also locating taller buildings to the north of the site in addition to the centre as the term "heart" implies. Considering the town centre as a whole, there is also a sound design and place-making argument for the transport interchange forming a gateway into the town centre and one of its "hearts" in addition to the central area in our site. The third bullet point in paragraph 5.20 states "the overall design must be provided in the context of the Underground Station and demonstrate wayfinding towards the public transport hub." The locating of marker buildings close to the station will consolidate a sense of arrival and together with the appropriate design of routes and spaces will aid wayfinding.</p>	<p>Directing tall buildings to the northern and eastern parts of the site in the SPD is considered to be too restrictive in design terms. The text will be updated, however, to allow more flexibility in delivering tall buildings in the most suitable location.</p> <p>Amend: update the second bullet point to read - 'Proposals for tall buildings should locate them in <u>those parts</u> heart of the site where there is more potential to establish a high-quality urban design that achieves higher densities. Within this area <u>Building</u> heights and massing should be varied to achieve an attractive mix of building types that is beneficial to the urban landscape and allows new residents access to views and sunlight.'</p>

			<p>Paragraph 4.23 explains that there is potential for “very tall buildings” in Edgware. The adopted plan makes clear that tall buildings should be directed towards growth areas. It therefore follows that it is the principal sites in the SPD area on which very tall buildings will be expected to arrive. Given the development potential of the station/shopping centre site and its location in the core area of the town centre, the SPD ought to direct “very tall buildings” here. We therefore suggest that the second bullet point of paragraph 5.20 be amended to read as follows:</p> <p><u>“Proposals for tall and very tall buildings should locate them towards the northern and eastern edges and in the heart centre of the site where there is more potential to establish a high-quality urban design that achieves higher densities</u></p>	
	Chapter 5 - Key Sites Design Guide, Design Vision	<p>The section on ‘Intuitive flows’ in paragraph 5.4 refers to minimal exposure to noise but it should be acknowledged that there will be general town centre noise and noise associated with transport movements from the transport hub. We suggest that the sentence is reworded to reflect this so the focus is on mitigating the impact of noise on more sensitive uses.</p>	<p>Amend: update to ‘with minimal minimised exposure to noise and air pollution ...’</p>	
	NA	<p>Given the status of the London Plan which has now been approved for adoption, it would be appropriate for the SPD to amplify its definition of high quality/good design and ensure that this is rooted in the Mayor’s definition of a design-led approach. While contextual considerations are key, a design-led approach ought also to consider the following aspects as set out in Policy D3 (Optimising Site Capacity Through the Design-led Approach) of the London Plan: Form and layout; Experience; Quality and character.</p>	<p>The SPD provides a framework for development and the councils are concerned that the inclusion of more specific design guidance would be too inflexible. The masterplan and application stages will be used to consider more detailed images and drawings.</p>	

			<p>We consider that the Edgware SPD must go further in supporting the delivery of sustainable, well designed higher-density, taller buildings in this location given its strategic potential. The SPD ought also acknowledge the contribution a critical mass of new residents will make to the long term vitality and economic health of a sustainable Edgware town centre. The Edgware SPD can do so by introducing the following into the document:</p> <ul style="list-style-type: none"> • Key Sites design appendix to provide design codes, statements and concept diagrams of what these sites could look like based on both local plan and London Plan designations and ambitions. This would assist in providing a visual references of the key sites design guides, which we consider a useful tool for all end-users but also is in keeping with the NPPF. • Greater explanation of what the Edgware’s designation as a Major Town Centre means and how this strategic designation underpins the growth ambitions of the SPD. 	
70	Centro Planning Consultancy (on behalf of Betterpride Limited, the freehold owner of Premier House)		<p>We are broadly supportive of the draft SPD, and the general principles it lays out for the long term development future of the Town Centre. Of particular importance is the emphasis on intensifying development at underused brownfield sites to provide an adaptable and vibrant town centre, and the suitability of this area for increased development height.</p> <p>We support the principle of intensifying the land uses in underutilised areas of the Town Centre, and we particularly support residential intensification at those areas identified as Key Sites later in the draft SPD.</p> <p>The principle that tall and very tall buildings are suitable in the Town Centre is fully supported.</p> <p>The spirit of encouraging taller buildings in the central part of the site, that can form a defined and coherent cluster near the station, at the entrance to the town, is</p>	<p>Amendments to the Key Site Design Guidance on the Broadwalk Centre and Station site – as set out in the response to Savills above - provides greatly flexibility to the siting of tall buildings, referring to locating <i>‘them in those parts of the site where there is more potential to establish a high-quality urban design that achieves higher densities.’</i></p>

			considered to be beneficial. This also allows for mid height developments on the edges of the key site to act as a stepping down to the lower height residential buildings at the edge of the SPD area.	
71	Resident		<p>The official designation of Edgware as a major town centre, and the proposal of “thousands of new homes” (Draft Edgware Growth Area SPD, section 2.2.6) should be of major concern to all Edgware residents, especially homeowners, and anyone who genuinely cares about the quality of urban environments.</p> <p>Edgware as a major town centre – since when?? Harrow, Watford, and Croydon town centres, yes. Clearly, these are examples of major town centres and set up as such, unlike Edgware. This idea is totally the opposite of what Edgware needs. The classification of Edgware as a major town centre is very convenient as it paves the way for approval of the idea of thousands of new homes.</p> <p>Edgware needs essential regeneration; it is more about restoring the order and harmony of a relatively new suburban town centre (less than 100 years old) to its original form and character as opposed to finding a new function or a new identity for the town.</p>	<p>Edgware Town Centre is identified within Barnet’s Draft Local Plan as a location for housing delivery, based on the accessibly location, and in line with London Plan policy.</p> <p>It is classified as a Major Town Centre by the London Plan and the councils support the success Edgware through the SPD.</p> <p>High-quality design that is responsive to context is vital to delivering effective and attractive redevelopment.</p>
72	Historic England Archaeology	Objective 8	<p>The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning.</p> <p>The SPD should include using archaeology to tell the story of the areas heritage.</p>	<p>The archaeological of Edgware offers potential to support the historical identity of the area. Amend: include reference to heritage in Objective 8. More specific references to archaeology are included in Chapter 3 Spatial Context and Chapter 4 Development Principles.</p>
		Chapter 3 Spatial Context, Heritage	<p>Include reference to the Barnet Designated Edgware: Hale Lane and Watling Street Archaeological Priority Area (APA) which covers part of the SPD area. The Description for this APA is as follows:</p>	<p>The SPD should reference these APAs. Amend: include reference to Hale Lane and Watling Street APAs.</p>

		<p><i>“Edgware is mentioned in the Domesday Book but under the parish of Stanmore and formed nucleated villages within the forested area until the 13th century. There is no Edgware manor mentioned in the Domesday Book, but there maybe a farmhouse, recorded since 1216 AD. However, this is probably located at Edgwarebury (ASAS 10). Agriculture developed in the 16th century, which was quite mixed and it became a small market in the 17th century. In 1862 AD it was said that the market town had disappeared. Industry had little impact on Edgware’s economy, but it is likely that there were gravel pits being worked from 1802 AD continuing into the early 20th century. This APA includes:</i></p> <p><i>Watling Street: A medieval settlement developed along the Edgware Road next to Edgware Brook. Edgware is a Saxon name, originally ‘Aeges Weir’. This was so-called because there would have been a nearby dam or weir constructed for Silk Stream and Dean’s Brook for fishing or irrigation (the latter is mentioned in a charter of 972-8 AD). The church of St Margaret is located here which had a tower dating to the 14th century. In 1370 AD, the Prior of St Bartholomew’s, Smithfield had land holdings in Edgware. Edgware Bridge is located here crossing the Edgware Brook, which is evident on a map from 1597 AD. A bridge was first mentioned in 1370 AD, called ‘Eggewerebrigge’.</i></p>	<p>The SPDs historical context information is aimed to provide an overview of the areas development and - notwithstanding the amendments set out in this schedule - is considered to be sufficiently detailed.</p>
	Chapter 3 Spatial Context, Heritage	<p>Also include reference to the Harrow designated “Edgware Village” APA which lies on the Harrow side of Edgware Road.</p> <p>Please note that the APAs within Barnet were last updated in 2007. GLAAS is currently reviewing all such areas and the Barnet APAs are due to be reviewed in 2023. The Harrow APAs are due to be reviewed in 2021</p>	<p>Amend: Include reference to Edgware Village APA.</p>
	Principle 4 – Ensure High Quality Design	<p>Heritage, including archaeology, can be used to enhance the experience of an area by telling the story of the areas</p>	<p>Heritage provides an opportunity to enhance Edgware’s identify and</p>

		and a Sensitive Approach to Heritage	heritage through sympathetic and imaginative public realm design.	environment. Amend: add text to state that archaeology can be used to enhance the experience of the area by telling the story of the area's heritage through sympathetic and imaginative public realm design.
		Principle 4 – Ensure High Quality Design and a Sensitive Approach to Heritage	Any applications within the APA should be supported by an archaeological desk based assessment. In some instance this may also need to be supplemented by an archaeological evaluation. Consultation with the GLAAS should sought as part of any pre-application discussions.	Amend: add text to state that proposals within an Archaeological Priority Area should be supported by an archaeological desk-based assessment.
73	Environment Agency	Chapter 1 Strategic Context	Strategic Context – Paragraph 1.16 - The SPD should also seek alongside growth (green growth) the delivery of benefits for the natural environment and climate change, which will also have benefits for social amenity, health and wellbeing, wildlife and the local economy. This paragraph should be amended.	Agree that the Strategic Context should refer to the need for green growth. Amend: include text referencing green growth that delivery benefits for the natural environment including tackling climate change.
		Chapter 2 Vision	The vision lacks an ambitious approach to improve the local environment in a wider sense. Although there is reference to creating a healthy town centre with substantial new and integrated public spaces and landscaping, the aims should be wider than that as there are broader environmental issues applicable to Edgware Growth Area that need to be directly addressed.	The vision can be expanded to encompass environmental concerns. Amend: Vision to reference environmental resilience through addressing pollution, biodiversity and climate change.
		Chapter 2 Objectives	We support objectives 12 and 13, but there should be an explicit objective to manage and improve the water environment to reduce flood risk and future water shortages, increase resilience to climate change and improve water-related habitats. As a minimum there should be an additional objective that deals with addressing flood risk and climate change, given the prevalence of this issue within the area.	Amend: add reference to flood risk in Objective 12 Objective 13 refers to habitats generically, including water habitats, and these are addressed more fully in Chapter 3 Spatial Context and Principle 8 - Tackle Environmental Issues

	Chapter 3 Environmental Profile	The SPD provides an opportunity to promote sustainable growth and bring about significant improvements to the natural environment. Although the 'Environmental Profile' on page 20 alludes to waterways and flood risk the commentary needs to be expanded to provide a more complete picture. This should be based on existing evidence base documents which haven't yet been fully utilised, but we would also recommend a Level 2 Strategic Flood Risk Assessment informs the SPD to further characterise the level of flood risk.	A Level 2 Strategic Flood Risk Assessment has been carried out for Barnet's emerging Local Plan. This includes a detailed assessment of the key sites within Edgware.
	Chapter 3 Environmental Profile	Paragraph 3.16 identifies the two waterways (Deans Brook and Edgware Brook) leading to some areas lying in Flood Zone 3 and also surface water flood risk in parts of the town centre. Flood zone 3 is indicative of an area which is at risk from fluvial (river) flooding in a 1 in 100 year annual probability or greater (1% chance) so the current definition within brackets is incorrect (i.e. a 1 in 100 year or less risk of flooding).	Amend: update reference to flood risk probability.
	Chapter 3 Environmental Profile	Paragraphs 3.17 and 3.18 identify the deficiency in access to or a network of open spaces and the presence of Deans Brook (Site of Borough Importance for Nature Conservation). However, more could be said about this. There are quite a few local wildlife sites around the perimeter of town centre including Deans Brook and Stoneyfields Park, Silk Stream and Burnt Oak Brook and Mill Hill Old Railway Nature Reserve (Bentley Priory SSSI is 2.2km away from the town). There is potential to improve biodiversity value and think about the SPD area's potential impact and link to wider habitats. In addition, you have utilised the data available on Water Framework Directive (or referenced the Thames River Basin Management Plan, 2015).	Reference to wildlife sites in the wider area should be included in the SPD. Amend: include information on other wildlife sites in the local area, including Silk Stream, Burnt Oak Brook, Stoneyfields Park and Mill Hill Old Railway Nature Reserve.
	Chapter 3 Environmental Resilience	Under 'Environmental Resilience' paragraphs 3.19 and 3.20 identify air pollution and noise pollution as key issues. Whilst we agree, this should be broadened out to	Amend: add reference to the impact of climate change being expected to increase the likelihood of extreme

			<p>other resilience issues such as flood risk, water resource stress and climate change. For example, Barnet is located within a wider south east area that suffers from serious water stress, and so water efficiency measures should be a requirement for all new developments (achieving 110 litres per head per day in accordance with the Optional Higher standards of Building Regulations for residential and BREEAM 'Excellent' with maximum water credits for non-residential). Climate change is likely to exacerbate and increase the risks from flooding and therefore flood resilience measures across the growth area will be vital to protect residents and the local economy and infrastructure.</p>	<p>weather events that pose a risk to health, including summer heatwaves, flooding, and drought.</p>
		<p>Principle 5 - Improved Environment and New Public Spaces</p>	<p>Principle 5 - Improved Environment and New Public Spaces. An opportunity has been missed to combine the principle of creating public open spaces with a sense of greenery and nature, with other objectives such as the provision of sustainable drainage, attracting wildlife and carbon capture through initiatives such as tree planting. The type of planting used and the ways in which the open spaces can contribute to water. Could boundary treatments and street furniture also include wildlife friendly planters? Where hard surfacing requires replacement, could greener options such as grassed areas, gravel or permeable paving be introduced?</p>	<p>Amend: add reference for green spaces to deliver environmental benefits such as attracting wildlife, natural SUDS, and carbon capture.</p>
		<p>Principle 8 - Tackle Environmental Issues</p>	<p>Deans Brook and Edgware Brook are classified together as the Silk Stream and Edgware Brook GB106039022970. This surface water body is currently failing to reach good status and is currently at moderate status. Multiple factors contribute to reasons for not achieving good status. The opportunity to improve the local rivers in tandem with opportunities to create new public open spaces should be championed within this SPD. For example, we identified a specific WFD action measure to improve the Edgware Brook near Hendon FC Stadium</p>	<p>The SPD supports the approach of a network of green linkages and enabling people to experience nature. The wording can be expanded and emphasised. Amend: update text to reference restoring the rivers and improving the river corridor habitat and spaces for wildlife, along the aim of connecting</p>

			<p>with buffer zone and riparian habitat improvements which might include river restoration, renaturalising river banks, river edge planting and habitat creation. We have also identified a number of weirs which are causing an obstruction to fish passage, which could also be improved by introduction of fish passage or removal if the weir is obsolete. Improving the rivers in this area will bring about improvements to nature and wildlife as a whole, as a wider range of species will be attracted to the habitats provided. Improving the rivers can also benefit flood risk by increasing flood storage and natural processes. This can also have other benefits such as improving health and wellbeing of residents and visitors, increasing the number of visitors (footfall) to the area and thereby benefitting the local economy. This SPD should encourage a net gain approach to biodiversity and the natural environment in general (Planning Practice Guidance definition: Net gain in planning describes an approach to development that leaves the natural environment in a measurably better state than it was beforehand)</p>	<p>green spaces and habitats across the area where possible.</p>
		<p>Principle 8 - Tackle Environmental Issues</p>	<p>This SPD should make explicit reference to applying the Sequential Test and Sequential approach to ensure sites within areas of lowest risk are prioritised ahead of selecting sites in areas of medium to high fluvial (and surface water) flood risk. The West London SFRA also provides climate change extents for each of the river models. The climate change flood outlines for the Silk Stream model also show an increase in the extent of flood risk from rivers in this area for the 35% and 70% allowances (for example, along Brook Avenue to north-east of Edgware Station). Consequently what this is showing is that there are areas where fluvial flooding would occur during these climate change scenarios which are currently at low risk.</p>	<p>Amend: add a bullet point to reference application of the sequential test and approach</p>

		<p>Principle 8 - Tackle Environmental Issues</p>	<p>Surface water flood risk is also mapped within the West London SFRA and is more extensive than the fluvial risk. Unless a further study is undertaken using the correct climate change allowances, the 0.1% annual probability extent from the Surface Water Flood Risk map represents the potential climate change adjusted impact of current risk. Barnet and Harrow's Surface Water Management Plans have both identified Critical Drainage Areas (CDA) within the Edgware Growth Area. It's important to recognize within this SPD that the different sources of flooding interact and can exacerbate flood risk. Increasing impermeable surfaces from development and a lack of capacity within the existing drainage network will also contribute to risk.</p>	<p>Amend: add text to reference that different sources of flooding can interact and exacerbating flood risk.</p>
		<p>Principle 8 - Tackle Environmental Issues</p>	<p>Small pockets of the SPD Area benefit from flood storage areas north of Edgware in Edgwarebury Park, Stoney Wood Lodge and near to Bransgrove Road over the border into Harrow which is evident from the 'Flood Storage Areas' and 'Areas Benefiting from Flood Defences' layer in the SFRA Policy Map. These flood storage areas were constructed as part of the Silk Stream Flood Alleviation Scheme approximately 10 years ago. We are currently working on a new Silk Stream Flood Alleviation Scheme intended to protect areas in Colindale and Rushgrove Park from flood risk. This is likely to require partnership funding contributions to be viable, and it's possible that planning contributions to this scheme may be sought, where appropriate.</p>	<p>Amend: reference that Planning contributions towards the new Silk Stream Flood Alleviation Scheme may be sought.</p>
		<p>Principle 8 - Tackle Environmental Issues</p>	<p>Reducing and managing flood risk and requiring sustainable drainage measures in this area is a must-do and should be strongly reflected in this SPD. There should be a sentence within the SPD which requires all development to utilise the guidance within the existing SFRAs to design layouts, mitigate and make space for water to help with the reduction of flood risk. In addition,</p>	<p>Amend: add text to state that proposals should utilise the guidance within the existing SFRAs to design layouts, mitigate and make space for water to help with the reduction of flood risk.</p>

			growth within the town centre and beyond may also be required to contribute financially to improving strategic flood defences, upgrading flood storage areas and defence assets and flood resilience in the area.	
		Principle 8 - Tackle Environmental Issues	Principle 8 - Tackle Environmental Issues - Whilst we support the references to mitigating and adapting to climate change, managing flood risk and creating new habitats, we think this section could be more specific and detailed. For example, paragraph 4.49 talks about the potential for opening up spaces such as the Deans Brook but we would like to see an explicit reference here to the opportunity to restore the rivers and improve the river corridor habitat and spaces for both people and wildlife. We'd also like to see the aim to plan to connect these green spaces and habitats across the area wherever possible. Paragraph 4.49 should seek to achieve net gains for biodiversity as a result of new developments. We support paragraph 4.49; but it doesn't really translate into what would be expected of new developments to achieve that aim. For example, do we want growth in Edgware to find a way of connecting to wider environmental assets by creating green networks and linkages? Growth should incorporate environmental measures that deliver multiple benefits, e.g. pocket parks that provide public access and amenity, spaces for wildlife, flood attenuation and carbon capture through tree planting.	Amend: expand bullet point to include reference to a net gain approach, restoring river habitats, and providing green networks and linkages.
		Principle 8 - Tackle Environmental Issues	Paragraph 1.9 identifies that in particular there is a lack of open public open spaces within the town centre, with no parks and little tree coverage or planting. This SPD should also be championing opportunities to make provision for this and creating a network and linkages between green spaces. There are potential opportunities to integrate the natural environment within the District's Town Centre's in addition to providing better access to	Through the Vision, Objectives, Development Principles and design guidance the SPD supports and encourages new and better open spaces and planting. Inclusion of further references are set out in other parts of this response.

			<p>open spaces. This can be achieved in a number of ways such as native tree planting, pocket parks, rain gardens, natural swales, permeable paving, green roofs and walls, bird and bat boxes and wildlife friendly planters. The geographic location of these measures can also link up to new green open spaces and existing green corridors such as river corridors. This SPD needs to be clear how growth will be expected to contribute to improving green spaces, green networks and biodiversity to improve health and wellbeing, reduce flood risk and increase resilience to climate change.</p>	<p>Amend: add reference to placing emphasis on measures that enhance and support the Urban Greening Factor as detailed in the London Plan.</p>
		<p>Principle 5 - Improved Environment and New Public Spaces</p> <p>Principle 8 - Tackle Environmental Issues</p> <p>Chapter 6 Public Realm Guide, Planting</p>	<p>Also- '<i>Managing flood risk through the design and location of development and make use of sustainable urban drainage systems</i>'... is positive but there is a lot more we should be pushing growth to achieve, such as creating more space for water, incorporating sustainable drainage systems as a must-do, selecting sustainable drainage measures that have multiple benefits (such as improving water quality and biodiversity) and designing for climate change. Additional hard surfacing is going to exacerbate the situation rather than alleviate it placing greater pressure on existing drainage networks to receive surface water runoff therefore developments need to achieve more green space, SuDS and more permeable paving. Measures such as rain gardens, pocket parks, green roofs and walls, planters, swales and tree planting can all help to capture and absorb rain water and are suitable in an urban setting. We think this section would benefit from providing references to further information such as the West London SFRA (2018) and the future Level 2 SFRA. It is essential that there is the physical infrastructure in place (flood risk infrastructure, surface water and waste water networks) to accommodate new developments. We'd also like to see a reference to water</p>	<p>Amend: add reference to the benefits of SUDS throughout the SPD, namely Principles 5 and 8, and the Public Realm Guide.</p>

			saving measures (water efficiency) as a requirement for both residential and non-residential uses.	
74	TfL	General	<p>An SPD should help guide decision makers on putting into action London-wide and local policy on development proposals that they may receive in this area. In general, TfL is supportive of how the policy has been developed, the level of engagement with TfL through various forums and technical supporting information.</p> <p>In accord with Barnet long-term Transport Strategy, we need investment in LU capacity to support growth in London including growth in Barnet and at sites such as Edgware. TfL would expect through the planning system to seek direct obligations and safeguards to deliver enhanced capacity on Edgware branch of the Northern Line, when that investment can happen will be decided through TfL Business Plan and Mayor's Transport Strategy. This may limit what can be built at Edgware until such investment has been made and at this stage.</p>	Welcome the support for the planning framework.
		Objective 3 Improving transport options	Edgware Town Centre will move towards being more sustainable, with better options to walk and cycle ... TfL suggests that you should add 'better public transport' (buses) will be needed for local travel as well as for 'those coming from further afield' as not everyone can walk or cycle and the socio economic profile of the area shows significant percentage of the populations in both Barnet and Harrow are people with protected characteristics, including a growing population of older age groups, with a forecast increase of 26% in over 65s up to 2030 in Barnet. The EqIA (for the SPD) says that there will be no adverse impact on people with protected characteristics.	Amend: update text to - '...with better options to walk, and cycle or take the bus to the Town Centre for those living locally ...'
		Chapter 2, Objectives Objective 3	<p>TfL queries why there is no objective relating to cutting down the amount of traffic.</p> <p>Objective 3 talks about improving transport options to move towards being more sustainable but these improvements must not lead to significantly adverse</p>	<p>These concerns are addressed through the change to Objective 3.</p> <p>Amend: '... far better local environment that and seek to ameliorate does not</p>

		traffic congestion impacts. This implies that the SPD aiming not to make traffic congestion worse which lacks ambition as the Council should be trying to reduce it in accordance with the Publication London Plan.	lead to significantly adverse traffic congestion impacts
	Objective 12 Tackle Climate Change and Pollution	This should also mention the reducing motorised traffic as a way of reducing air pollution and prioritising active travel`	The Objectives are intended to be high level, with more details provided in Development Principle 8 Environmental Issues.
	Chapter 3	Figure 12 on page 21, looks 1930s or even later	Amend: update Figure 12 caption to reference the mid twentieth century.
	Chapter 3 Spatial Context	In 3.27, the Council should acknowledge a third major change in the 1960s with the construction of the tall office block (Premier House and associated retail on the south side of Station Road. TfL understands that this was on the site of the Great Northern Railway station, not the Broadwalk shopping centre as stated.	Amend: include reference to Premier House in the development of the area.
	Chapter 3 Spatial Context	In 3.28, there's a typo in the table of listed buildings: 'Edgwarebury' (not 'Edgware bury').	Amend: typo corrected
	Principle 2 Transport Options Chapter 7 Transport and Movement Guide	In 4.11 (and 7.6), TfL would dispute the statement that 'trains [through Edgware station] are highly congested during peak-hours'. There are fewer than 500 people travelling in either direction in any fifteen-minute period. Given there's a train every three minutes and each can carry almost 800 passengers, this is a considerable exaggeration. The capacity constraints are towards central London. This will change with growth at Burnt Oak, Colindale, Hendon Central and Brent Cross.	Amend: update wording in paras. 4.11 and 7.6 to remove reference to train usage levels at Edgware.
	Principle 2 Transport Options Chapter 7 Transport and Movement Guide	In 4.11, the statement that 'the station operates within capacity', should be verified through data analysis though likely to be correct. TfL provides open source data on passenger numbers and analysis of baseline station capacity could be undertaken. TfL advice is the station	Station capacity information is based on the Transport Study. The text will be rephrased for clarity. Amend: 'Whilst busy, the station <u>is observed to</u> operates within capacity'

			observed capacity should be verified to create a base position to assess the growth assumption in the SPD.	
		Chapter 5 Key Sites Design Guide	The area analysis by segmentation fails to identify any opportunities where development sites could contribute to increasing permeability for walking and cycling and removing pressure from the main thoroughfares.	While movement and linkages through the sites are referenced, the wording can be strengthened. Amend: for the Broadwalk Centre and Forumside sites reference better and new walking and cycling routes to reduce pressure on main thoroughfares.
		Chapter 5 Key Sites Design Guide	There are references to reduce the severance impact of the Northern line on the area – however, it is not clear what is expected. TfL would be open to discuss this aspect. Its important that any works in or around LU infrastructure safeguard our ability to operate and maintain the railway.	Amend: include references in the Broadwalk Centre site section to reducing severance caused by the Northern Line, and the need to maintain LU operations.
		Chapter 5 Key Site – Broadwalk Centre and the Station	In 5.20 fifth bullet, the wording should be tightened. The Council should explain why there should be retention of some car parking for town centre users and especially commuters and what quantity with evidence that takes account of the MTS. The policy starting point is car free in areas of good accessibility such as Edgware.	Update to reference the need for evidence. Amend: para. 5.20 There should be retention of some The provision of car parking for town centre users, and potentially commuters, must be based depending on evidence of assessed need
		Chapter 5 Key Sites Design Guide	In 5.30 first bullet, typo ‘metres’ (not ‘meters’).	Amend: typo corrected
		Chapter 5 Key Sites Design Guide	In 5.12, the area appears to include the depot too. Why does the boundary line not cover the circular drop off area in front of the station or the building directly to the west of the bus station access road facing on to Station Road?	Boundary lines were drawn to follow building frontage alignments.
		Chapter 5 Key Sites Design Guide	In relation to point 5.12 and figure 31 & 32 TfL is concerned to see the area TfL have discussed at length with Barnet Council previously in relation to potential	The boundary reflects that within Barnet’s Draft Local Plan Sites Schedule. Further text can be added to clarify the

		expanded stabling for a future Northern line upgrade and expanded fleet continue to be highlighted as an area of 'high development' opportunity (see above). It important that this operation LU land remains available for operational purposes for the longer term. This is supported by the Barnet Long term transport strategy.	importance of this area for LU requirements. Amend: add a new bullet point to para. 5.20 – <u>'London Underground infrastructure comprising tracks and sidings to the eastern part of the site is expected to remain available for operational purposes for the longer term.'</u>
	Chapter 7 Transport and Movement Guide	Something ought to be mentioned about ways of preventing or deterring use of the central part of Station Road to the east of the station for informal car parking.	Amend: insert in Chapter 7 the need to deter informal parking along the central section of Station Road.
	Chapter 7 Transport and Movement Guide	Bus priority should be explored where queuing occurs. Drop off at LU station creates conflicts with bus operations; referring to picture on page 31 of Edgware Transport Strategy Appendix 1 Recognise that there will be a substantial increase in bus usage (Principle 2 of the Development Principles). The Transport Assessment baseline Appendix points to a 46% in bus boarding and 28% in alighting activity. 33% of LU station users arrive by bus during the am peak, 33% during the day, rising to 50% in the pm peak.	Amend: through a new sub-section in Chapter 7, include references to the expected increases in bus usage, the potential for bus priority, and traffic conflicts at the Tube station
	Chapter 7 Transport and Movement Guide	The section on 'Promoting Active Travel' (page 50) needs to make more reference to promoting bus travel as well as not adversely affecting bus travel. Bus travel incorporates active travel, prioritising road space for buses directly benefits bus users, as well as benefiting walkers and cyclists.	This section includes support for bus travel as an important means of moving around the area.
	Chapter 7 Transport and Movement Guide	The aim is no one to be killed or seriously injured by or in a bus by 2030, and all serious injuries and deaths to eliminated on London Streets by 2041. Your particular focus on the interaction between the bus station vehicle access and Station Road needs to be set within a broader	Promoting a safe and Secure environment for all road users is set out in the Active Travel section of Chapter 8. Amend: 'Promote a safer and more secure environment for all road users

			<p>set of interventions along Station Road, to making the street less vehicle dominated.</p> <p>TfL recommendation is to reduce road speeds to 20 mph within the study area and the introduction of slow street (less than 12 mph) where pedestrian flows are higher or being encouraged to increase due to development e.g. Station Road.</p>	<p>including pedestrians and cyclists, <u>making the roads less vehicle dominated, and considering a 20 mph zone on Station Road.</u></p>
		Chapter 7 Transport and Movement Guide	<p>Safer streets, the focus is on junctions, in this case this should include the access to the bus station, as well as the access to the car park, and major junctions such as the A5/ Station Road junction. This should include better facilities for cyclists and pedestrians, a more pleasant walking environment, and a safe, simpler and more accessible experience for bus users</p>	<p>An additional bullet point has been added to Chapter 8, Promoting Active Travel, relating to new and improved road crossings.</p> <p>The new section on Roads and Traffic addresses bus priority and managing conflict with other users around the station.</p>
		Chapter 6 Public Realm Guide	<p>The public realm guide currently only considers wayfinding, street furniture, planting and signage as relevant factors. Reference should be made to Healthy Streets which considers a wider range of influencing factors in the public realm and should be made specific to Edgware.</p>	<p>Amend: included reference to Healthy Streets in Chapter 6 the Public Realm Guide.</p>
		Chapter 6 Public Realm Guide	<p>As well as Healthy Streets indicators, other issues related to public realm:</p> <ul style="list-style-type: none"> • noise and air pollution need to be considered in this context; • the high street footways as a zone for shop fronts, display or catering, seasonal activation (e.g. Christmas lights, or festivals), • importance of sensitive design with regard to accessibility and heritage, simplified material palette etc. • Management of cycle parking, deliveries and rubbish removal. 	<p>Amend: Insert new paragraph to Chapter 6 providing further opportunities offered by public realm improvement.</p>

			<ul style="list-style-type: none"> • Harmonising footway lighting v highway lighting 	
	Throughout	There is recognition that maintaining the high PTAL rating is important and that public transport operation must remain viable. There are useful headline principles offered for any relocated bus station on page 36/37 of the main Transport Strategy.		Support for maintaining PTAL levels is present throughout the SPD, including in the Vision, Objectives and Design Principles.
	Chapter 8 Delivery and Implementation	The 'Delivery Timelines (Transport)' measures for the bus station need further consideration on pages 55 and 56. The first one says 'Reduce conflict between bus station and other users'? The Council should clarify what this means and what is envisaged to achieve it. Shouldn't the primary measure be to improve and ensure a high quality interchange with the tube station and between bus services within the bus station?		Amend: update the text to - ' Improve the relationship Reduce conflict between <u>the</u> bus station and other town centre users'
	Chapter 8 Delivery and Implementation	The 'Delivery Timelines (Transport)' measures for the bus station need further consideration on pages 55 and 56. The fourth one says 'Develop proposals for a relocated bus station....'. The requirements for the bus station as set out in 7.9 do not assume the bus station is going to be moved, rather they set some key tests for any development proposals. These criteria also place considerable importance on ensuring integration with the station. It would therefore be premature to include relocation as a delivery test for the SPD – TfL suggests that ' <i>Develop proposals for a new or upgraded integrated bus station facility</i> ' would be more appropriate at this stage, to allow for a range of options to come forward.		Amend: update the text to - 'Develop proposals for a new or upgraded integrated relocated bus station facility following detailed principles'
	Chapter 8 Delivery and Implementation	<p>Delivery timelines:</p> <ul style="list-style-type: none"> • Healthy Streets and Active Travel Zone approach needs to be followed from the outset • Cycling infrastructure from the outset • Traffic reduction and reduce speeds from the outset • Delivery and consolidation needs to be considered early on as it impacts on ground floor 		Amend: updated timelines

75	Owner – Ballard Mews	Principle 7 - Promote Economic Growth and Local Jobs	You plan includes no provisions whatsoever for commercial / light industrial which is a strong provider of jobs in the locality.	Principle 7 does make reference to office and light industrial uses. LB Harrow support Ballards Mews as a functioning light industrial site.
		Chapter 5 – Key Sites Design Guide	You identify Ballards Mews as an area of low development potential (as shown on your map). This is a surprise given it is a relatively easy to develop site for housing or commercial use.	The location is within a Conservation Area which restricts the intensity of potential redevelopment.
76	Resident	General	My concern still remain that the document is more aspirational than one that would give sense of direction for integrated and comprehensive improvement of greater Edgware.	The SPD provides a planning framework for the area. More detailed approaches will be established through masterplans and development proposals.
		Chapter 1	I further feel that the town centre SPD should embrace Edgware Hospital site given its importance to the health of the local community and as a major non-retail employment site. I'm sure you are aware that Edgware General was downgraded to a community hospital and the A and E facility moved to Barnet Hospital. The free transport between the two hospitals has quietly been withdrawn - thereby adding to congestion on our roads. I am not sure, if the Local Authority has been effectively engaged to expand its services with imminent increase in the local population resulting from the large-scale housing developments that would be approved by the council. I am very concerned that Edgware community hospital is disposing of its "surplus" land. I would like the SPD to protect this hospital site in light of the large-scale population increases resulting from the massive A5 Edgware Road corridor housing developments currently taking place from Stone Grove along Burnt Oak/Colindale to West Hendon and Cricklewood.	The SPD boundary largely follows the town centre boundary. Extending to include Edgware Hospital would not support renewal of the town centre. The hospital is treated as a site in its own right in Barnet's Draft Reg 18 Local Plan Schedule of Sites.

		General	The issues of congestion in Station Road and Edgware town centre is well known. If the vacant site adjoining the Sainsbury's car park is to be developed, then a direct road link to Deans Lane (A5109), needs to be conditional, before any development commences.	While the SPD requires improvements in movement and circulation, detailed proposals will be prepared as part of masterplanning or development proposals.
		Objective 10 Principle 6 – Deliver Community Facilities	The document refers to improved community facilities that potential developments may lead to, but it would be useful to have a list of amenities that developers would be required to provide. There are references to public toilets which has been an ask (outside the Broadwalk when it is shut) by the local community for more than a decade and nothing has come of it.	The SPD requires that renewal of the town centre should support and, where necessary, improve community facilities.
		General	Tall buildings are now increasingly of concern to many - not least in the light of the Grenfell Tower fire. A tall buildings capacity study was asked for, when such an exercise was undertaken some 10 years ago. Is such a study to be produced for underpinning this SPD?	Edgware Town Centre is identified by the Local Plan as an area potentially suitable for tall buildings.
77	Local Worker	NA	I am a consultant who works at both Northwick Park and Edgware Hospital. As a Director of Screening for North London Breast Screening, access for transport has been found to be a major factor to access screening. I am therefore asking this is not lost in your consultation. Furthermore, there does not appear to be any plans to support the move to electrified vehicles. The provision of publicly accessible charging points is essential. The creation of housing these days mean that flat owners do not have the ability to charge outside their own homes, which would increase the deprivation of those who do not live in a house and deprive them access to transport (as not everybody's work can use public transport eg keyworkers who work shifts and nights still need access to vehicles).	Electric vehicle charging requirements are set out in the councils' Local Plan documents.

**London Borough of Barnet
Policy and Resources
Committee Work Programme**

July 2021 – February 2022

Contact: Maria Lugangira – maria.lugangira@barnet.gov.uk

Title of Report	Overview of decision	Chief/Lead Officer(s)	Issue Type (Non key/Key/Urgent)
20 July 2021			
Hendon Hub Full Business Case	To recommend the approval of the Full Business Case for Hendon Hub	Deputy Chief Executive	Key
The Burroughs / Middlesex Supplementary Planning Document (SPD)	Formal Council adoption of The Burroughs & Middlesex Area Supplementary Planning Document.	Deputy Chief Executive	Key
30 September 2021			
Q1 2021/22 Strategic Performance Report	Q1 2021/22 Strategic Performance Report This report also seeks Committee approval for a series of budget management decisions for 2021/22 required as part of normal business in line with the organisation's Financial Regulations.	Director of Resources (Section 151 Officer)	Non-Key
West Finchley Neighbourhood Plan	Adoption of Neighbourhood Plan Following Referendum	Deputy Chief Executive	Key
Local Development Scheme	3-year timetable for delivering the Local Plan, Community Infrastructure Levy and Supplementary Planning Documents	Deputy Chief Executive	Key

Title of Report	Overview of decision	Chief/Lead Officer(s)	Issue Type (Non key/Key/Urgent)
Regulation 20 (Submission of Local Plan)	Submission to the Planning Inspectorate of Local Plan Regulation 19 and representations	Deputy Chief Executive	Key
9 December 2021			
Q2 2021/22 Strategic Performance Report	<p>Q2 2021/22 Strategic Performance Report</p> <p>This report also seeks Committee approval for a series of budget management decisions for 2021/22 required as part of normal business in line with the organisation's Financial Regulations.</p>	Director of Resources (Section 151 Officer)	Non-Key
9 February 2022			
Q3 2021/22 Strategic Performance Report	<p>Q3 2021/22 Strategic Performance Report</p> <p>This report also seeks Committee approval for a series of budget management decisions for 2021/22 required as part of normal business in line with the organisation's Financial Regulations.</p>	Director of Resources (Section 151 Officer)	Non-Key
Business Planning	To approve and recommend the Budget and Medium Term Financial Strategy to Full Council on 1 March 2022.	Director of Resources (Section 151 Officer)	Key

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