

MEETING

POLICY AND RESOURCES COMMITTEE

DATE AND TIME

THURSDAY 30TH SEPTEMBER, 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

Councillor Dean Cohen	Councillor Geof Cooke	Councillor Val Duschinsky
Councillor Anthony Finn	Councillor Ross Houston	Councillor Arjun Mittra
Councillor Alison Moore	Councillor Sachin Rajput	Councillor Barry Rawlings
Councillor Gabriel Rozenberg	Councillor Peter Zinkin	

Substitute Members

Councillor Paul Edwards	Councillor Jess Brayne	Councillor Melvin Cohen
Councillor Mark Shooter	Councillor Rohit Grover	Councillor Kath McGuirk
Councillor Alan Schneiderman		

In line with the Constitution's Public Participation and Engagement Rules, requests to submit public questions or comments must be submitted by 10AM on the third working day before the date of the committee meeting. Therefore, the deadline for this meeting is **Monday 27 September at 10AM**. Requests must be submitted to Faith Mwende faith.mwende@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: Faith Mwende faith.mwende@barnet.gov.uk

Media Relations Contact: Tristan Garrick 020 8359 2454

ASSURANCE GROUP

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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 Comments (if any)	
6.	Members' Items (if any)	11 - 18
7.	Response to Members Item in the name of Councillor G Cooke - 8 February 2021	19 - 34
8.	Business Planning 2022-26 and in-year financial management 2021/22	35 - 72
9.	Proposed Delivery and Outcomes Framework for the Barnet Plan 2021-25	73 - 102
10.	Barnet's Local Plan - Submission - Town and Country Planning (Local Planning) (England) Regulations (Reg 22) and Barnet's Local Development Scheme.	103 - 722
11.	West Finchley Neighbourhood Plan - Adoption	723 - 808
12.	Proposed Extension of the Shared Service Agreement with Harrow for the Provision of Legal Services (HBPL)	809 - 820
13.	Assurance Group Update	821 - 836
14.	Local Contact Tracing for COVID	837 - 856
15.	Post-decision scrutiny cover report for Carers and Young Carers Support Services DPR Waiver	857 - 868
16.	Committee Forward Work Programme	869 - 872

17.	Any other item(s) the Chairman decides are urgent	
18.	Motion to Exclude the Press and Public	
19.	Any other exempt item(s) the Chairman decides are urgent	

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Decisions of the Policy and Resources Committee

20 July 2021

Members Present:-

AGENDA ITEM 1

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

Councillor Dean Cohen
Councillor Geof Cooke
Councillor Sachin Rajput
Councillor Barry Rawlings

Councillor Gabriel Rozenberg
Councillor Melvin Cohen (In place of
Councillor Val Duschinsky)
Councillor Alan Schneiderman (In place of
Councillor Arjun Mittra)
Councillor Rohit Grover (In place of
Councillor Caroline Stock)

Also in attendance
Councillor Nizza Fluss

Apologies for Absence

Councillor Caroline Stock
Councillor Val Duschinsky
Councillor Ross Houston

Councillor Arjun Mittra
Councillor Alison Moore

1. MINUTES OF LAST MEETING

RESOLVED that the minutes of the meeting dated the 16 June 2021 be agreed as a correct record.

2. ABSENCE OF MEMBERS

Apologies for absence had been received from:

- Councillor Caroline Stock who was substituted for by Councillor Rohit Grover;
- Councillor Val Duschinsky who was substituted for by Councillor Melvin Cohen; and
- Councillor Ross Houston who was substituted for by Councillor Alan Schneiderman.

3. DECLARATION OF MEMBERS' DISCLOSABLE PECUNIARY INTERESTS AND NON-PECUNIARY INTERESTS (IF ANY)

The Chairman advised the Committee that Councillor Caroline Stock had intentionally withdrawn from the meeting as she held an unpaid voluntary position at Middlesex University as Pro-Chancellor and to avoid any perception, perceived or actual, of pre-determination she has decided to not attend today and was substituted by Councillor Grover.

4. REPORT OF THE MONITORING OFFICER

None.

5. PUBLIC QUESTIONS AND COMMENTS

Details of the questions asked and the answers provided were published and circulated at the meeting. Verbal responses were given to supplementary questions at the meeting.

6. MEMBERS' ITEMS

None.

7. PETITION - LAST CHANCE TO SAVE OLD HENDON LIBRARY

The Lead Petitioner, Ms Gabbie Asher, addressed the Committee for three minutes. The Chairman and Committee Members asked her questions. The Committee noted the petition.

8. PROPOSED HENDON HUB REDEVELOPMENT FULL BUSINESS CASE

The Chairman introduced the report which set out the Full Business Case for the proposed regeneration of three main sites, plus several ancillary sites, with a view to submitting a planning application in Summer 2021.

The Committee noted that the following additional documents had been published with the reports for this item:

1. Public Interest Test – Proposed Hendon Hub Redevelopment;
2. Addendum to Appendix 3 – Proposed Hendon Hub Redevelopment Equalities Impact Assessment July 2021; and
3. Amendment to recommendation 10.d.

The Hendon Ward Member, Councillor Fluss, addressed the Committee for three minutes. Committee Members asked Councillor Fluss questions.

Chris Smith, the Assistant Director for Estates, presented the report.

At the invitation of the Chairman, James Kennedy, Deputy CEO of Middlesex University, addressed the Committee.

Officers from the Growth and Libraries services answered questions from the Committee.

During the debate on the item, Councillor Rajput declared a non-pecuniary interest as a Council appointed trustee of Nicholl & Daniel Homes Charity which owned property in the proposed regeneration area. He reported that he had taken advice from the Monitoring

Officer and Governance who had confirmed that the interest was non-pecuniary and he would remain and vote on the item.

Councillor Barry Rawlings **MOVED** that the item be **DEFERRED** to a future meeting of the Policy & Resources Committee to enable the Council to obtain counsel's opinion on legal points raised by a resident in relation to the release of information as any delay to the project could be costly.

Upon the deferral being put to the vote, the vote was recorded as follows:

For	5
Against	7
Abstentions	0

The deferral was therefore **LOST**.

Upon the result of the vote being declared, Committee Members requested that the vote be recorded. Committee Members voted as follows:

Councillor Dean Cohen	Against
Councillor Melvin Cohen	Against
Councillor Cooke	For
Councillor Longstaff	Against
Councillor Grover	Against
Councillor Mittra	For
Councillor Rajput	Against
Councillor Rawlings	For
Councillor Rozenberg	For
Councillor Schneiderman	For
Councillor Thomas	Against
Councillor Zinkin	Against

In accordance with Article 2.3 (e) of the Constitution (see section 5.4.1), three Members of the Committee requested to **REFER** the decision to Council for determination. The Committee Members supported the proposed referral. The Chairman advised the Committee that the item would be referred to Full Council to make the decision. In making the referral, the Committee requested details of comments received from Historic England since the publication of the committee papers be reported to Council.

Following the referral, the Chairman called an indicative vote on the item. Upon the recommendations, including the addendums and amendments reported to the Committee, being put to the vote, the vote was recorded as follows:

For	5
Against	7
Abstentions	0

The indicate vote on the recommendations set out the report and the additional addendums and amendments was therefore **APPROVED**.

Upon the result of the vote being declared, Committee Members requested that the vote be recorded. Committee Members voted as follows:

Councillor Dean Cohen	For
Councillor Melvin Cohen	For
Councillor Cooke	Against
Councillor Longstaff	For
Councillor Grover	For
Councillor Mitra	Against
Councillor Rajput	For
Councillor Rawlings	Against
Councillor Rozenberg	Against
Councillor Schneiderman	Against
Councillor Thomas	For
Councillor Zinkin	For

The item had been **REFERRED** to the next available meeting of Full Council for decision.

9. THE BORROUGHS AND MIDDLESEX UNIVERSITY SUPPLEMENTARY PLANNING DOCUMENT

The Chairman introduced a report which set out a proposed Supplementary Planning Document (SPD) for The Burroughs and Middlesex University to provide guidance for the redevelopment of the area around The Burroughs and the Middlesex University campus in Hendon.

Neeru Kareer, Assistant Director Planning and Building Control, presented the report.

Upon being put to the vote, the recommendations in the report were declared carried. The vote was recorded as follows:

For	7
Against	5
Abstentions	0

The Committee noted the proposed amendment to section 1.10 of the SPD as reported as an addendum.

RESOLVED that the Committee:

1. **Note the responses to consultation on The Burroughs and Middlesex University Supplementary Planning Document (SPD) as set out in the Schedule of Representations and Responses (Appendix B).**
2. **Following consideration of the consultation responses adopts The Burroughs and Middlesex University Supplementary Planning Document (SPD) (Appendix A) including the addendum referred to above.**
3. **Delegates authority to the Chief Executive to make any necessary minor changes to the SPD in consultation with the Chairman of the Committee before final publication.**

10. STRATEGIC COMMUNITY INFRASTRUCTURE LEVY (CIL) ALLOCATIONS

The Chairman introduced the report which outlined the priorities for the capital programme for the next five years drawing on the draft Infrastructure Delivery Plan previously approved by the Committee. The report sought approval for the list of projects to be prioritised for CIL subject to sign off from individual programmes and projects be relevant theme committees.

The Assistant Director for Capital Delivery, Matthew Waters, presented the report.

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

RESOLVED that the Committee:

- 1. Note proposed priority capital projects for the next 5 years as set out in Appendix A.**
- 2. Approve the proposed use of Strategic Community Infrastructure Levy to contribute towards the Council's priority capital projects subject to the production and approval of required Business Cases through appropriate project governance.**

11. CREATION OF NEW POST: ASSISTANT DIRECTOR - ASSURANCE

The Chairman reported that this item had been WITHDRAWN.

12. COMMITTEE FORWARD WORK PROGRAMME

RESOLVED that the Committee note the Forward Work Programme.

The meeting finished at 9.15 pm

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Policy and Resources Committee

30th September 2021

Title	Member's Item in the names of Councillor Alison Moore
Report of	Head of Governance
Wards	All
Urgent	No
Key	No
Status	Public
Enclosures	None
Officer Contact Details	Faith Mwende, Senior Governance Officer - Assurance Faith.Mwende@barnet.gov.uk

Summary

The report informs the Committee of a Member's item and requests instructions from the Committee.

Recommendations

1. That the Committee's instructions in relation to the Member's item is requested.

1. WHY THIS REPORT IS NEEDED

- 1.1 A Member of the Committee has requested that the item tabled below is submitted to the Policy and Resources Committee for consideration and determination. The Committee are requested to provide instructions to Officers of the Council as recommended.

Member	Item
<p data-bbox="204 293 368 353">Cllr Alison Moore</p> <p data-bbox="204 439 395 611">Impact of national insurance contribution increase</p>	<p data-bbox="491 293 1433 387">The Government's recently announced 1.25 per cent increase to national insurance contributions (NICs) will have an impact on budgets and services across the Council.</p> <p data-bbox="491 427 1433 589">The Council estimates the cost will be around £600,000 a year in their employers' contributions. Although the increase is intended to be cost neutral to the public sector the details of how this will be covered have not been announced. Officers expect costs to come back to the Council indirectly through the Council's supply chain.</p> <p data-bbox="491 629 1433 689">It is not acceptable for the Council to pay for this NIC increase by cutting services.</p> <p data-bbox="491 730 1433 824">For adults' social care the NIC increase will impact the sustainability of the care market with higher prices a likely outcome and a risk that some providers may stop trading altogether.</p> <p data-bbox="491 864 1433 1025">It will also affect schools, particularly primary schools where the proportion of the budget accounted for by staffing costs is higher and where a significant proportion of our schools are already struggling to balance their budgets with a growing number using deficit budget arrangements.</p> <p data-bbox="491 1066 1433 1160">I request that the Committee consider these issues and agree that a report comes back to the next meeting setting out the likely impact on Council services and contractors, and how this will be addressed.</p>

2. REASONS FOR RECOMMENDATIONS

- 2.1 No recommendations have been made. The Committee are therefore requested to give consideration and provide instruction.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 Not applicable.

4. POST DECISION IMPLEMENTATION

- 4.1 Post decision implementation will depend on the decision taken by the Committee.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 As and when issues raised through a Member's Item are progressed, they will need to be evaluated against the Corporate Plan, Barnet 2024 and other relevant policies.

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

Property, Sustainability)

5.2.1 None in the context of this report.

5.3 Legal and Constitutional References

5.3.1 The Council's Constitution (Members of the Council, Article 2) states that a Member, including appointed substitute Members of a Committee or Sub-Committee will be permitted to have one matter only on an agenda that he/she serves. Members' items must be within the term of reference of the decision-making body which will consider the item.

5.4 Social Value

5.4.1 Not applicable.

5.5 Risk Management

5.5.1 None in the context of this report.

5.6 Equalities and Diversity

5.6.1 Members' Items allow Members of a Committee to bring a wide range of issues to the attention of a Committee in accordance with the Council's Constitution. All of these issues must be considered for their equalities and diversity implications.

5.7 Corporate Parenting

5.7.1 None identified in the context of this report – any substantive report will consider the implications in detail.

5.8 Insight

5.8.1 None.

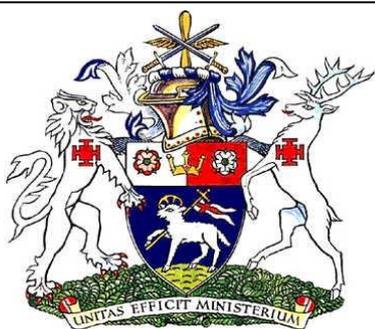
5.9 Consultation and Engagement

5.9.1 None in the context of this report.

6. BACKGROUND PAPERS

6.1 Email from Councillor Alison Moore on 20 September 2021.

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Policy and Resources Committee

30th September 2021

Title	Member's Item in the names of Councillor Barry Rawlings
Report of	Head of Governance
Wards	All
Urgent	No
Key	No
Status	Public
Enclosures	None
Officer Contact Details	Faith Mwende, Senior Governance Officer - Assurance Faith.Mwende@barnet.gov.uk

Summary

The report informs the Committee of a Member's item and requests instructions from the Committee.

Recommendations

1. That the Committee's instructions in relation to the Member's item is requested.

1. WHY THIS REPORT IS NEEDED

- 1.1 A Member of the Committee has requested that the item tabled below is submitted to the Policy and Resources Committee for consideration and determination. The Committee are requested to provide instructions to Officers of the Council as recommended.

Member	Item
<p data-bbox="201 286 357 353">Cllr Barry Rawlings</p> <p data-bbox="201 434 432 577">Viability assessments and affordable housing</p>	<p data-bbox="488 286 1436 421">Following an independent report into the published viability assessment for the development at 84 West Heath Road, the Council have increased the affordable housing commuted sum payable to £6m. The Council had previously accepted the developer's proposal that only £900k was due.</p> <p data-bbox="488 456 1436 591">I request that the Committee agrees to ask Audit Committee to retrospectively investigate how much money in affordable housing commuted payments may have been lost to the Council from all planning applications where commuted sums were payable.</p> <p data-bbox="488 627 1436 750">I also request that this investigation reviews other developments where the proportion of affordable housing has been reduced because of developer's viability assessments to see whether the assessments were fair/correct.</p>

2. REASONS FOR RECOMMENDATIONS

- 2.1 No recommendations have been made. The Committee are therefore requested to give consideration and provide instruction.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 Not applicable.

4. POST DECISION IMPLEMENTATION

- 4.1 Post decision implementation will depend on the decision taken by the Committee.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 As and when issues raised through a Member's Item are progressed, they will need to be evaluated against the Corporate Plan, Barnet 2024 and other relevant policies.

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

- 5.2.1 None in the context of this report.

5.3 Legal and Constitutional References

- 5.3.1 The Council's Constitution (Members of the Council, Article 2) states that a Member, including appointed substitute Members of a Committee or Sub-Committee will be permitted to have one matter only on an agenda that he/she serves. Members' items must be within the term of reference of the decision-making body which will consider the item.

5.4 **Social Value**

5.4.1 Not applicable.

5.5 **Risk Management**

5.5.1 None in the context of this report.

5.6 **Equalities and Diversity**

5.6.1 Members' Items allow Members of a Committee to bring a wide range of issues to the attention of a Committee in accordance with the Council's Constitution. All of these issues must be considered for their equalities and diversity implications.

5.7 **Corporate Parenting**

5.7.1 None identified in the context of this report – any substantive report will consider the implications in detail.

5.8 **Insight**

5.8.1 None.

5.9 **Consultation and Engagement**

5.9.1 None in the context of this report.

6. **BACKGROUND PAPERS**

6.1 Email from Councillor Barry Rawlings on 20 September 2021.

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Policy and Resources Committee

30 September 2021

Title	Response to Members Item in the name of Councillor G Cooke – 8 February 2021
Report of	Chairman of the Policy and Resources Committee
Wards	All
Status	Public
Urgent	No
Key	No
Enclosures	Annex A – Revised Process Annex B – Properties identified as not being banded
Officer Contact Details	Ashley Hughes – AD Investments & Innovation - Ashley.hughes@barnet.gov.uk

Summary

The report provides a response to the Committee of a Member's Item posed at the Policy & Resources Committee on 8 February 2021.

The council's Local Land Planning Gazetteer (LLPG) is, as at August 2021, 99.997% accurate and considered gold standard against the national measurement of Valuation Office Agency (VOA) council tax records matched to an LLPG criteria. Against the number of households in the borough, the 0.003% potentially unknown equates to 4 properties.

These 4 potential properties, if considered to be Band D rated for Council Tax (the council charges £1,377.33 per Band D property in 2021/22), represent unknown and uncollected income of £5,509.32.

Unknown and uncollected income can be mitigated by the council's current policy to backdate any council tax liability to the banding date set by the VOA, no matter how far back they may determine the banding date to be once they become known to the council.

Enhancements to process and insights in response to the Member's Item include:

- using different sources of information and systems (already available within the council) to identify properties by cross-matching against council tax systems
- cross-referencing and sharing information collected through our LLPG with the council tax team, and
- exploring solutions within our current systems to identify unknown and/or uncollected income.

Processes will be put into place to regularly review the impact of these enhancements.

Officers Recommendations

1. Policy & Resources Committee notes the answer to the Member's Item as below.
2. A follow-up to investigation of data matching exercise to be provided to a future Policy and Resources Committee

1. WHY THIS REPORT IS NEEDED

- 1.1 A Member of the Committee requested that the item tabled below was submitted to the Policy and Resources Committee for consideration and determination on 8 February 2021. The Committee requested a response from officers of the Council.

Member	Item
<p>Cllr Cooke</p> <p>Council Tax Revenue Safeguarding</p>	<p>While enquiring about a particular case, I have discovered that the registration of properties for Council Tax after new-build, renovation, extension or sub-division depends on the developer or owner volunteering to the relevant authority that the work has been completed.</p> <p>There is little incentive for the developer to do that and so delays of years may occur and even a permanent loss of revenue to the council. No interest is charged on retrospective liabilities. It appears that this problem exists largely because of a lack of any comprehensive process for cooperation between public bodies to prevent it. Using computers to cross-reference information from disparate sources is already standard practice for the council in combatting fraud.</p> <p>I propose that the relevant senior officers review the situation, devise a suitable process and report their proposal back to Policy and Resources committee by September 2021 after considering proactive information sharing and cross-referencing between those responsible for:</p> <ol style="list-style-type: none"> 1. Council tax (Capita CSG) 2. Property banding (Valuation Office Agency, part of national government) 3. Building Control (Re) 4. Planning (Re) 5. Street Naming and Numbering (Re) 6. Benefits (Capita CSG) 7. Electoral Registration (Barnet Council) 8. Corporate Anti-Fraud (Barnet Council) 9. and any other agencies which hold relevant information. <p>If automatic cross-referencing with publicly available records of private sales and/or lets is possible, that should also be incorporated into the process.</p>

2. REASONS FOR RECOMMENDATIONS

- 2.1 Following the members enquiry, a full review of the inspection process has been undertaken, resulting in a revision to existing processes and introduction of new measures (see annex A).

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 To implement no changes as result of investigatory work. Opportunities to introduce improvements following a review of processes undertaken by other councils have been introduced within our recommendations. The revised process is included in Annex A.

4. POST DECISION IMPLEMENTATION

- 4.1 See section 5.4 for insight activity to be undertaken as part of this work.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 As and when issues raised through a Member's Item are progressed, they need to be evaluated against the Barnet Plan 2021-25, and other relevant policies.

- 5.1.2 This report is written in the context of the four Barnet Plan priorities:

- Clean, safe and well run
- Thriving
- Healthy
- Family Friendly

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

- 5.2.1 The Council has budgeted to collect £198.05m for Council Tax in 2021/22. A Band D property incurs a charge of £1,337.33.

- 5.2.2 For scale, every 1000 properties, at Band D, that are unknown and not charged is a risk to the council's funding to the value of £1.337m.

- 5.2.3 As a mitigation to the risks above, the council tells the VOA of the earliest date it can evidence the property was complete and therefore liable for Council Tax. The VOA will then band the property from that date.

- 5.2.4 If the notification is later than it should be, then banding will be backdated. The developer/resident will therefore be liable to pay Council Tax from the start date. The VOA will send confirmation of the banding to the resident/developer, providing appeal rights if they disagree. There is no limit to backdating in respect of Council Tax banding.

- 5.2.5 The council has undertaken a matching exercise using Council Tax records and the LLPG. The results of the matching exercise provide us with an understanding of possible financial implications as a result of this members query.

- 5.2.6 The matching exercise has identified c.3,400 properties that do not appear on the CTAX register; of these c.1,200 require further investigation as they relate to development (c.700 of which are new

builds and could be in the process of being banded), the remainder being houses of multiple occupation with a single Council Tax bill, for example.

- 5.2.7 Based on a worst-case scenario, if all 1,200 properties were banded as a Band D, the possible loss of revenue to the council could be c.£1.6m per annum until such a date as the VOA bands and dates the properties for Council Tax.
- 5.2.8 The results of the further investigation and analysis will be brought back to a future Policy and Resources committee.
- 5.2.9 If liability is backdated then the statutory recovery process will be adhered to in accordance with the Local Government Finance Act 1992 (LGFA1992). If the amounts due fall within the current financial year then the Council Tax payer will have until end of financial year to pay, this can be in full or by instalments. If the liability is backdated for prior years, a separate demand for payment will be issued, a special arrangement plan can be agreed in this instance if the Council Tax payer cannot pay in full. If the Council Tax payer doesn't pay then they will go through the statutory recovery process in accordance with Reg.23 LGFA 1992 – reminder, 2nd reminder if appropriate, final notice if appropriate then summons to court. If taken to court, all costs reasonably incurred by the authority are added to the outstanding balance and are payable to the authority. The court has to agree these costs and a standard fee is set for all debtors irrespective of circumstances. Neither Primary or Secondary legislation allows the authority to charge interest on Council Tax.
- 5.2.10 In addition to the new process and additional measures introduced, officers are considering further options available from external partners. Any progression of external support will be payment by results-based. Properties not identified through the proposed internal process will attract a one-off percentage charge to be negotiated (there will be no fees payable for any backdating or future years' liabilities). A similar activity is currently undertaken for Business Rates properties.
- 5.2.11 This exercise will ensure the end-to-end process is robust and further support the new measures introduced, highlighting any potential gaps within the process. Any properties identified through a proposed external supplier will be used to continually review our own process.

5.3 Legal and Constitutional References

- 5.3.1 The Council's Constitution (Members of the Council, Article 2) states that a Member, including appointed substitute Members of a Committee or Sub-Committee will be permitted to have one matter only on an agenda that he/she serves. Members' items must be within the term of reference of the decision-making body which will consider the item.

5.4 Insight

- 5.4.1 The LLPG used by the council has been rated as gold standard* (99.997% accuracy, equating to 4 records unknown), this gives confidence that new properties in the main are known to the council. *The statistic is VOA council tax records matched to an LLPG record - and is a national criteria.
- 5.4.2 In addition to the new processes introduced, the council, with its strategic partner Capita, are due to undertake a full data matching exercise across various services; this exercise will include the following:
- Matching exercise between Council Tax records and LLPG,
 - Matching exercise against Parking data (where data is available).
 - Matching exercise against Planning information (where data is available).
 - Process map to be created from receipt of a planning application through to CTAX/Business Rates being notified, including all stages in between such as Street Name and Numbering notifying the LLPG team.

- Ongoing process review with relevant departments involved in the process; to be reviewed regularly for service improvement.

5.4.2 Upon completion of the data matching exercise, consideration be given to an external audit of the Council Tax base as mentioned in 5.2.2.

5.4.3 The exercise will identify any properties that are not currently banded by the VOA or under inspection by Barnet's own inspection team. This initial exercise will allow for further review of the new processes in place.

5.5 **Social Value**

5.5.1 The council will secure appropriate social value outcomes through any procurement exercise it undertakes with respect to future external work to inspect the council tax base.

5.6 **Risk Management**

5.6.1 The lack of clear processes around the inspection process and ultimately collection of Council Tax could result in a significant loss of revenue for the council.

5.6.2 The changes to existing processes and introduction of new measures enables properties to be brought into the rating list at the earliest opportunity and therefore maximise Council Tax collection within Barnet.

5.6.3 Further mitigations are outlined earlier in 5.2.3 regarding backdating ability for banding and billing retrospectively to developers/residents where necessary.

5.7 **Equalities and Diversity**

5.7.1 Members' Items allow Members of a Committee to bring a wide range of issues to the attention of a Committee in accordance with the Council's Constitution. All these issues must be considered for their equalities and diversity implications.

5.8 **Corporate Parenting**

5.8.1 None identified in the context of this report

5.9 **Consultation and Engagement**

5.9.1 None in the context of this report.

6. **BACKGROUND PAPERS**

6.1 Policy and resources Committee, 8 February 2021, Item 6, Members item - <https://barnet.moderngov.co.uk/documents/s63175/Members%20Item.pdf>

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Annex A – Revised Process

The new build/development process has been amended to the below.

Locate new build/developments/residential property splits via the following sources:

- Building Control monthly reports (include Initial Notice Report, Commencement Report and the Completion Report).
- Liaise with the Gazetteer department (Geographic Information System (GIS)) who provide information regarding new streets and developments.
- Planning department yearly housing trajectory local plan
- Street Naming & Numbering (SNN) decision letters
- Barnet Homes Development team
- Valuation Office Agency (VOA)
- Owner/tenant contact
- Benefit claimant contact
- Inspector local knowledge and investigations
- Local newspaper (new development stories and weekly planning announcements)
- Any properties that are identified by LLPG (Local Land and Property Gazetteer) matching are then added to the Tax base forecast and monitored by the inspectors. If the property is already in use it's referred immediately to the VOA. For incomplete properties, upon the issue of a completion notice these are then referred to the VOA.

Check SNN/Building Control system to obtain:

- The official naming/numbering, this could include the name of the road if a new development
- Confirm the number of new dwellings

Cross reference the information with the information held on the Planning Portal to confirm:

- Number of properties
- Developer/builder details

Once the new development/new build details have been established i.e., the number of flats/houses/owner/developers, these are then added to the Tax base report whereby they will be monitored until they are completed and referred to the VOA to allow them to be brought into the list.

If the property is to be demolished or is having major works to be split into flats or bring it back to one household, the VOA will be notified and if they are in agreement the property will be taken out of the Council Tax list from the agreed date.

The progress of the build will be monitored on a monthly basis by the inspectors. A completion notice can be served once it is deemed to be substantially complete up to 3 months before the completion of the development/new build.

Once the building works have been completed, whether established by customer contact, our inspectors visit or the completion notice, the Valuation team will notify the VOA, who will then band the property within 3 months.

Each hereditament will be set up on our database. If the owner details are not known, Land registry is used to confirm ownership details. The VOA will be issued with a Billing Authority Request (BAR) to set the banding.

Once the band has been set a demand notice will be issued to the customer.

- Planning applications – historically Inspectors would scan the Planning Portal, but the above enquiry has led to a change in the process and now Inspectors are sent the following information:
 - Planning List (weekly) – new applications/enquiries awaiting approval
 - Initial Notice Reports (INR) (monthly) - however this only covers 30% of the market inspected by RE, the rest are done by external approved building inspectors. Often RE don't hear anything from external inspectors following planning being granted until work starts, which can cause a delay to then being added to the report. This report has only just started in the past few months but is now sent to CT team.
 - Commencement Reports (monthly) - this is run off the first inspection that is carried out – this will capture any properties that are with external Building Inspectors not picked up in the INR above.
 - Completion Reports (monthly) – This report will detail all new builds, conversions and loft conversions, extensions. This will also include any retrospective applications.

The Initial Notice and Completion Reports should capture all building works undertaken. The Completion Reports are key for early identification of properties that need to be registered for Council Tax.

Whilst the room for errors has been significantly reduced the following risks remain in place:

- Time for property to be completed or for final inspection to take place, as there can be a lag between when works are completed and when the external inspectors notify the Council.
- Building Control's approved inspectors aren't chased regarding incomplete properties or those without completion reports – processes to be developed to ensure this is done proactively.
- Illegally converted houses into flats are harder to identify but often neighbours will notify council or if occupants wish to claim benefits or housing allowance claimants and the property doesn't exist in the system the benefits will ask Council Tax team to investigate. No claim or payment can be made without postcode and address. Currently there isn't an automated system for housing or benefits teams to send info to Council Tax, so done via email.
- Barnet Homes Development team – Council Tax office contacts them periodically for projections or what new developments are in the pipeline, also checks their website – not automatic, Council Tax team have to do the chasing

Currently LLPG match their list against VOA records however there is an outstanding issue with the files being corrupted which LLPG are working on with the VOA.

A quarterly matching exercise will be carried out between LLPG and CTAX/Business Rates records.

Property Bandings (Street Naming & Numbering):

Street naming and numbering applications bypass the CTAX process, Applications at the moment are sent to the Valuation Office Agency (VOA), who then send them back to Street Naming and Numbering. Any properties brought into the list by the VOA following this process are added to the VOA schedule which is sent to the valuation team on a weekly basis. There is currently a page on the Barnet Website which explains this process.

* Valuation Office Agency (VOA) external govt dept - assess properties to bring onto the Council Tax list. Inspectors visit properties and once they are completed the Valuation Team sends a weekly Billing Authority Request via the CT system (OpenRevenues) of all new properties/CT requests, directly to their system. VOA then calculate what the banding should be. VOA applications are also logged in master spreadsheet –VOA recently changed their Service Level Agreement to 3 months for a response, which slows things down sometimes and can cause frustration with property owner/tenant contact.

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Annex B – Properties identified as not being banded

Address	Date of Query	For any properties not identified prior to Cllr query what measures have been introduced	Comment	Timeframes & Outcomes	Outcomes
189 and 191 Barnet Road EN5 3JZ	01-Mar-21	Not applicable	Both 189 and 191 are registered and banded with effect from 03/09/2019 to the Developer	<ul style="list-style-type: none"> • Reported to Valuation Team – 17/12/2020 • Reported to the VOA on the 22/12/2020 • Banding received from VOA 20/1/21 • Billed 20/1/21 	Current Position – Banded and Billed
91 Milton Avenue EN5 2EY	01-Mar-21	We have monthly reports from Building control of Initial, Commencement and Completions (Final) Notices provided. Although this would not be of any help if the customer made no application to Planning or Building Control.	<p>The previous owners of No.89 with planning permission built an extension to the house over the existing garage. Since selling the property on the 07/05/2010, the new owners seem to have converted the garage further into a habitable dwelling and combined this with the former extension above it to form a separate property.</p> <p>No Planning Application was made to the Council until 2019 when retrospective planning</p>	<ul style="list-style-type: none"> • Made aware by Cllr Cooke on 12/01/21 • Reported to the Valuation Team on the 18/01/2021. • Valuation Team actioned the report on the 20/01/2021 and report issued by system on 26/01/2021. • Banding received from VOA 7/2/21 • Billed 10/2/21 	Current Position – Banded and Billed

Address	Date of Query	For any properties not identified prior to Cllr query what measures have been introduced	Comment	Timeframes & Outcomes	Outcomes
			<p>approval was sought for a Certificate of Lawfulness.</p> <p>The application was approved as the owner informed as part of the application that the property had been used as a separate dwelling to 89 Milton Avenue with effect from 01/06/2011</p>		
28 Bedford Avenue EN5 2EP	01-Mar-21	Properties that are Taken out of Tax are monitored periodically for possible changes such as demolition or start / ongoing construction work.	The property was taken out of tax by the VOA due to Fire Damage.	<ul style="list-style-type: none"> Made aware by Cllr Cooke on the 12/01/2021. Visit was made on the 14/01/2021, property rebuilt and board informing "Sold". 	Current Position - Property registered and BAR issued - awaiting notification from the VOA of the band to apply
81 Fitzjohn Avenue EN5 2HN	01-Mar-21	Not Applicable	Both 81 and 81A were reported to the VOA for deletion from the list due to Major Construction work being undertaken with effect from 11/02/2020.	<ul style="list-style-type: none"> Email from Cllr Cooke on the 12/01/2021. Visit was made on the 14/01/2021, property is still under construction to be monitored monthly. 	Current Position - recent visit on the 5th August 2021 to site confirmed construction work still in progress - continues to be monitored

Address	Date of Query	For any properties not identified prior to Cllr query what measures have been introduced	Comment	Timeframes & Outcomes	Outcomes
1-15 Abele House 1 Tewkesbury Close EN4 8FG	01-Mar-21	Not Applicable	As per External Building Control Company Final Certificate not issued and therefore cannot be occupied. They also informed that the build was not complete, and the owners were trying to sell the development to Barnet Housing, but it fell through. Subsequent attempts to sell the property for occupation have been unsuccessful due to Covid-19.		Current Position - Inspection Carried Out 08/09/21. Builders informed property to be completed and inspected by External Building Control in 2 weeks. All flats to be registered from date of Final Notice by BC and reported to the VOA for band assessment
152A Mays Lane EN5 2LT	01-Mar-21	We have monthly reports from Building control of Initial, Commencement and Completions (Final) Notices provided. Although this would not be of any help if the customer made no application to Planning or Building Control.	Property registered for Council Tax with effect from 26/08/2016. Report sent to VOA on the 23/02/2021	Email from Cllr Cooke to manager on the 17/02/2021	Current Position - Property registered and BAR issued - awaiting notification from the VOA of the band to apply. Chased VOA on 7 July 2021 and was promised that it would be on the next report - VOA to be contacted again.

Address	Date of Query	For any properties not identified prior to Cllr query what measures have been introduced	Comment	Timeframes & Outcomes	Outcomes
11 Sphinx Way EN5 2FG	05-Mar-21				Current Position - Property registered and BAR issued - awaiting notification from the VOA of the band to apply
2 Golda Close and 3A Golda Close EN5 2LX	13-Mar-21	Not Applicable	2 Golda Close - report sent to the Valuation Team from details provided by the Owner/Developer on the 01/02/2021. 3A Golda Close according to records was banded on 09/12/2014	<ul style="list-style-type: none"> • Report to Valuation Team sent 01/02/2021. • VOA report sent 09/02/2021 • Banding received from VOA 28/3/21 • Billed 31/3/21 	Current Position – Banded and Registered
349 Mays Lane EN5 2QF	15-Mar-21	We have monthly reports from Building control of Initial, Commencement and Completions (Final) Notices provided. Although this would not be of any help if the customer made no application to Planning or Building Control.	To be reported to the VOA.	Not Applicable	Current Position - Visit to property scheduled for 10/09/2021 to begin the process of registration and assessment by the VOA.

Address	Date of Query	For any properties not identified prior to Cllr query what measures have been introduced	Comment	Timeframes & Outcomes	Outcomes
25 Bertram Road NW4 3PR	13-Apr-21	Not Applicable	Property registered for Council Tax with effect from 26/03/2021	<ul style="list-style-type: none"> Property was De-listed on report to the Valuation Team dated 04/02/2020. The VOA requested for new PRN and re-listed the property with effect from 26/03/2021 Banding received from VOA 20/6/21 Billed 21/6/21 	Current Position – Banded and Billed
107 Audley Road NW4 3EU	14-Apr-21	Monitoring of all deleted properties for possible re-build. Using data held by SNN, BC and Planning to achieve this.	Property registered for Council Tax w with effect from 101/12/2019	<ul style="list-style-type: none"> The VOA re-listed the property on Schedule dated 26/05/2021 via LOR Banding received 26/5/21 Billed 26/5/21 	Current Position – Banded and Billed
Flats 1-4, 151 Audley Road NW4 3EN	14-Apr-21	Not Applicable	<p>All four flats assessed with effect from 27/03/2020.</p> <p>Report sent to Valuation Team on the 07/05/2020.</p> <p>Subsequent Reports sent to the VOA 12/05/20</p>	<ul style="list-style-type: none"> Report sent to Valuation Team on the 07/05/2020. Subsequent Reports sent to the VOA 12/05/20 Banding received from VOA 28/6/21 Billed 29/6/21 	Current Position - All Properties Banded and Billed

Address	Date of Query	For any properties not identified prior to Cllr query what measures have been introduced	Comment	Timeframes & Outcomes	Outcomes
Flats 1-42, 90 Hillview Gardens NW4 2JR		Not Applicable	All 42 Flats banded with effect from 01/04/2021 (Details provided by Developer) as per report sent to the Valuation Team on the 23/04/2021. Reports to VOA issued 04/05/2021	<ul style="list-style-type: none"> • Developer emailed on 25/3/21 and response sent 13/04/21. • Report sent to the Valuation Team on the 23/04/2021. • Reports to VOA issued 04/05/2021 • Banding received 13/6/21 • Billed 15/6/21 	Current Position - All Properties Banded and Billed

	<p>AGENDA ITEM 8</p> <h2 style="text-align: center;">Policy & Resources Committee</h2> <h3 style="text-align: center;">30 September 2021</h3>
<p style="text-align: center;">Title</p>	<p>Business Planning 2022-26 and in-year financial management 2021/22</p>
<p style="text-align: center;">Report of</p>	<p>Chairman of Policy and Resources Committee</p>
<p style="text-align: center;">Wards</p>	<p>All</p>
<p style="text-align: center;">Status</p>	<p>Public</p>
<p style="text-align: center;">Urgent</p>	<p>No</p>
<p style="text-align: center;">Key</p>	<p>Yes</p>
<p style="text-align: center;">Enclosures</p>	<p>Appendix A: Scenario B (base case) MTFs and overlay scenarios A and C. Appendix B: Updated Capital Programme</p>
<p style="text-align: center;">Officer Contact Details</p>	<p>Anisa Darr – Director of Resources (S151 Officer) Anisa.Darr@barnet.gov.uk</p> <p>Ben Jay – Assistant Director of Finance (Deputy S151 Officer) Ben.Jay@Barnet.gov.uk</p>

Summary

This report provides an update for Business Planning and the assumptions for the Medium-Term Financial Strategy (MTFS) for 2022-26, whilst giving an update on the expectation of savings required from Theme Committees.

It also presents, for approval, a number of routine financial management matters, in line with financial regulations, including budget virements and updates to the programme of capital investment.

Officers Recommendations

That the Committee:

In respect of business planning for 2022-26:

1. Notes the higher than usual uncertainty in the following three areas (para 2.7):
 - Estimates for ongoing service demand and income pressures due to the impact of Covid-19;
 - Flexibility around social care precept; and
 - Level of grant funding as a result of the Spending Review 2021.
2. Notes the three scenarios (A, B – base case, and C) modelled for the Medium Term Financial Strategy for 2022/23 and the preliminary assumptions for future years (from para 2.12; also appendix A)
3. Requests theme committees to find savings based on MTFS scenario B (base case) taking into account any equalities impacts. These savings will then be referred to Policy and Resources for consideration and at a later stage be subject to public consultation and an updated equality impact assessment.

In respect of routine financial matters for 2021/22:

4. Approves the proposed revenue budget virement for 2021/22; set out in paragraph 3.1 (£0.900m from contingency to the 18-25 years service).
5. Approves the revised Capital Programme and financing of it; from paragraph 3.2 (also appendix B) including scheme slippage, accelerations, additions, and deletions.

1. SUMMARY

- 1.1 The committee received an update to the Business Planning 2022-26 and Medium Term Financial Strategy (MTFS) process at its meeting in June 2021. This report provides a further update with a set of initial budget proposals ahead of the Theme Committees in November 2021.
- 1.2 The main subject for this report is business planning for 2022/23 and the MTFS period to 2025/26, set out in section 2 and appendix A. It also presents some routine items for P&R committee approval in line with financial regulations. These are set out in the section 3. The proposed revisions to the capital investment programme are detailed in appendix B.

2. REVISED MEDIUM TERM FINANCIAL STRATEGY

March 2021 MTFS

- 2.1 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 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 for 2020/21, with indicative savings for later years (at March 2021)	(10,590)	(18,488)	(27,334)	(34,802)
Cumulative Savings Gap	0	8,579	10,322	14,109

2.2 The pandemic has had a significant impact on the delivery of and cost of services and on the certainty of the outlook. This has had an impact on the Medium-Term Financial Strategy. The MTFS set out in March 2021 covered the period 2021-25. At that point, the MTFS indicated a remaining savings requirement for 2022/23 of £8.6m, rising to £14.1m by 2024/25.

Evolving national context

2.3 A HM Treasury announcement is expected to be delivered by the Chancellor of the Exchequer on 27 October, covering both a multi-year spending review and key points of the government's budget proposals for 2022/23. The Ministry of Housing, Communities and Local Government (MHCLG) is not a 'protected' department and therefore it is possible there will be further savings passed down to local government via the settlement funding. While the level of funding is open to speculation, the multiyear spending review will begin to provide some certainty around anticipated future resources.

2.4 The Finance Settlement for Local Government is expected to follow in December 2021. This will provide the specific impact of the 27 October announcements for each council.

2.5 It is unclear how the recent announcement on health and social care funding reform, and the decision to increase national insurance contributions (NICs) by £1.25% will affect councils¹ directly as employers and as purchasers of commissioned services. Current analysis from information known does not anticipate funding into adult social care in the next year.

2.6 The government's policy document sets out clearly that social care cost pressures will "be met through Council Tax, social care precept, and long-term efficiencies; the overall level of Local Government funding, including Council Tax and social care precept"², indicating that, at the time of writing, council tax increases (including the social care precept) remain an option, but that long-term efficiencies will also be required.

2.7 The recent publication of inflation rates has highlighted inflationary risks, although it is also clear that this is in part due to the comparison with the same period 12 months earlier

¹ [Building Back Better: Our Plan for Health and Social Care \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/978223/building-back-better-our-plan-for-health-and-social-care.pdf)

² Ibid, para 36

(where spending and prices were significantly affected by Covid-19 response measures). It may not, therefore, be a reliable indicator of future inflation rates. Nevertheless, inflation is a clear risk in the early years of this MTFS, and the council will continue to review the latest data, both overall and in different sectors (e.g. construction materials).

Updated MTFS estimates: scenario planning

- 2.8 Likely resources available across the MTFS have been reviewed. The council remains firmly in control of its spending and continues to invest in priority areas identified by residents, partner agencies and councillors; and to redirect resources from lower priority activities. This is evidenced by the strong close to the financial year 2020/21 and the in-year monitoring position where pressures have been contained within additional funding available.
- 2.9 However, as noted above, the availability of ongoing resources to support council activity is uncertain. In the context of this uncertainty, the council is planning on using a range of scenarios, so that the financial outlook can be mapped from different perspectives and the necessary decisions taken in a timely way and in the light of the available information.
- 2.10 This MTFS review has, therefore, been prepared in a different way than usual, as set out below. This allows a clear analysis of where there is more or less certainty in the MTFS period, and highlights current areas of higher uncertainty, and the possible impact of those. The areas of uncertainty will be reduced as we get closer to approving the budget. As this happens the MTFS which supports the budget report will remove the scenarios and replace them with a single set of likely estimates, based on the most recent information.
- 2.11 The approach has been to create a baseline estimate using areas where there is greater confidence and informed by a 'snapshot' of the current position, and then two scenarios as 'overlays' to that. The key areas where there is ongoing uncertainty are:
- Social Care Precept – any increase regarding the social care precept for 2022/23 has not been set out. Increases have not been ruled out by government and in the recent white paper there is a greater indication that it will be used to fund the pressures in social care. Further guidance is usually issued alongside the financial settlement in December. For some years councils have been permitted to increase the general rate by up to 1.99% (before requiring a local referendum), and separate permission has also been given to levy a social care precept of up to 2%, although this has varied³. Scenarios for 2022/23 range from 0% + 0%, to 2% + 2% (approximately worth £8m overall). It is assumed that +1% per year growth in the tax base is unchanged in all scenarios.
 - Service pressures and income reductions – these are currently focused on adult social care, but also cover lost income in car parking and leisure and other general pressures. Work is ongoing to understand pressures as much as possible, and to separate short term pressures (which, since they are time-limited, can be funded from reserves, Covid money or provisions) and long-term pressures (which should properly be included in

³ Specific instances have included a one-off 3% precept (2021/22), and other instances where a total increase of 6% was permitted over three years, with no more than 3% in any one year (so, 2% + 2% + 2%, or 3% + 3% + 0%, or similar). The three year arrangement was later extended to be up to 8% over 4 years, with no more than 3% in any one year.

base budgets). Ideally, all service pressures will be absorbed by services; in practice it is likely that some pressures, especially in adult social care, may not be able to be contained within existing budget provisions.

- Government funding resulting from the Spending Review 2021 (SR21): Recurrent funding received through the financial settlement is difficult to estimate. It is possible that further cuts will be passed to Local Government, it is also possible additional funding will be provided to deal with ongoing Covid pressures.

Updated MTFs estimates: baseline resource and spending estimates

- 2.12 Settlement funding assessment (including the estimate of retained business rates receipts) now remains unchanged at £64.749m in all years. This reflects uncertainty over the net impact of the annual increase in the multiplier (a positive impact) and the impact of the pandemic on local businesses (currently a negative impact). The performance of business rates in the current year remains uncertain and the subject of regular review. Latest assessments are that the overall level of net receipts in 2021/22 are expected to be £2.9m lower than anticipated. Current year performance is better than during the pandemic but has not yet returned to pre-pandemic levels (and may not do so for some time to come).
- 2.13 Estimated future grant receipts are assumed such that all grants remain unchanged, except for New Homes Bonus which is expected to reduce by £2m per year.
- 2.14 Estimated council tax receipts have been retained at the same levels as in March, with a small increase for growth in the council tax base, which is recovering at a faster rate than anticipated in March. This MTFs assumes 1% per year growth in the tax base in all scenarios (i.e. local households required to pay council tax). The estimate for the current year is 0.2% level of growth. The actual level of growth is under ongoing review, and future estimates may be revised if needed. 1% growth in the base is broadly equal to £2m. The overall level of growth is taken after reducing it for increased levels of households claiming council tax support. This grew during the pandemic and a further increase is anticipated following the end of furlough scheme this year.

Table 2: 2021-2026 MTFs Summary: current planning assumptions

2021/22	Item	2022/23	2023/24	2024/25	2025/26
-	<u>Council Tax Base:</u>	-	-	-	-
162,868	No. of Band Ds + growth	164,349	165,842	167,348	168,868
(14,774)	CTS Assumptions	(15,083)	(15,234)	(15,387)	(15,541)
148,094	No. Band D Dwellings	149,266	150,608	151,961	153,327
0.19%	Council Tax Growth Assumption (net of CTS)	0.79%	0.90%	0.90%	0.90%
	Scenario A assumptions				
1.99%	Council tax – general increase (gross rate)	1.99%	1.99%	1.99%	1.99%
3.0%	Council Tax – social care precept (gross rate)	2%	2%	2%	2%
NA	Recurrent funding – assumes expected NHB losses are reversed (or other changes with a similar impact; values are differences to scenario B)	+£2m	+£4m	+£6m	+£8
+£10.2m	Non-Recurrent funding – Covid-19	+£5m	nil	nil	Nil

2021/22	Item	2022/23	2023/24	2024/25	2025/26
NA	Service pressures are 33% lower than currently anticipated	-33%	-33%	-33%	-33%
	Scenario B (baseline) assumptions				
	<u>Council Tax rate:</u>				
1.99%	Council tax – general increase (gross rate)	1.00%	1.99%	1.99%	1.99%
3.0%	Council Tax – social care precept (gross rate)	1%	1%	1%	1%
NA	Recurrent funding – all grants as at present, except NHB which sees a reduction of £2m pa from 2021/22 levels	-£2m	-£4m	-£6m	-£8
+£10.2m	Non-Recurrent funding – Covid-19	+£5m	nil	nil	nil
NA	Service pressures are as currently than currently anticipated	NA	NA	NA	NA
	Scenario C assumptions				
1.99%	Council tax – general increase (gross rate)	0%	1.99%	1.99%	1.99%
3.0%	Council Tax – social care precept (gross rate)	0%	2%	2%	2%
NA	Recurrent funding – assumes expected losses are unchanged from the base case	+£2m	+£4m	+£6m	+£8
£10.2m	Non-Recurrent funding – Covid-19 – nil	Nil	nil	nil	Nil
NA	Service pressures are 33% higher than currently anticipated	+33%	+33%	+33%	+33%

Spending estimates

- 2.15 Estimated spending has been updated for latest information (up to September 2021) and early budget estimates received from services. Inflation may exceed 2% for specific sectors but the extent or timing of this is not yet clear. The recent increase in inflation seen in the 12 months to August was impacted by low levels of spending in the same month 12 months before, so is not a reliable guide to future inflation levels. This risk remains under review.
- 2.16 Other spending assumptions informing the MTFS baseline case (scenario B) are:
- Provision for the expected increase in the North London Waste Authority levy continue to be increased at £1.5m per year, in advance of the opening of the North London Heat and Power Project (expected in 2025/26) which will increase the levy.
 - Provisions for pensions employer contributions were included for 2021/22 and no further increase is required until the next triennial review.
 - One-off covid-19 spending, reflecting the one-off grant receivable in 2021/22, is removed in 22/23. The same treatment applies to Council Tax discretionary payments. A further one-off amount of £5m in 2022/23 is included.
 - Service pressures and mitigating efficiencies are being prepared and are not yet finalised; current estimates are included as scenario B. Key areas of further work are
 - Cost estimates for adult social care services.
 - The overall level of recovery of key income streams, including business rates, car parking income, and income from leisure facilities and sports centres.

- Contingency funding has been included at £5m per year from 23/24 (current estimates are that £4m of the current year contingency budget will be retained and carried forward to 2022/23).
- Latest estimates have increased the level of rebate on Freedom Passes, and this revised amount is included in the estimates below. Some of the benefit anticipated in 2022/23 reverses in 2023/24 assuming a return to 100% activity levels; the value may be revised for subsequent actual activity levels or revised projections in future years.

2.17 The table below sets out the impact of those spending assumptions. Overall spending is estimated in the base-case as £342.1m in 2022/23, rising to £418.2m by 2025/26 (an increase of £77m – 23% - overall, or £19m - 5.6% per year).

Table 3a: 2021-2026 MTFs: base-case spending estimates

2021/22		2022/23	2023/24	2024/25	2025/26
£m	<u>Forecast Expenditure - Base Scenario</u>	£m	£m	£m	£m
309.535	Base Expenditure Budget	333.101	342.102	369.561	394.431
3.271	Inflation - Non Pay	3.204	3.912	4.413	4.413
2.179	Inflation – Pay	3.327	3.382	3.437	3.437
1.500	North London Waste Authority levy	1.500	1.500	1.500	1.500
0.659	Capital Financing (MRP)	0.220	0.000	0.000	0.000
0.500	Pensions: Employer Contribution and Deficit Recovery	0.000	0.000	0.000	0.000
8.110	Statutory / Cost Drivers Sub Total	8.252	8.793	9.350	9.350
10.225	Covid-19 Grant: Expenditure	(10.225)	0.000	0.000	0.000
9.283	Service Pressures and Investment	15.844	10.546	10.519	10.202
6.982	Contingency - general risks	0.000	5.000	5.000	5.000
1.000	Council Tax Discretionary Payment	(1.000)	0.000	0.000	0.000
(2.130)	Concessionary Fares (Freedom Pass)	(3.869)	3.120	0.000	0.000
25.360	Service Expenses sub total	0.750	18.666	15.519	15.202
0.341	Public Health Grant increase	0.000	0.000	0.000	0.000
0.346	Housing Benefit and Council Tax Administration Grant	0.000	0.000	0.000	0.000
0.000	Flexible Homelessness Support Grant	0.000	0.000	0.000	0.000
0.686	Grant Income grossed up	0.000	0.000	0.000	0.000
343.691	Forecast Expenditure (Before Savings; Base case)	342.102	369.561	394.431	418.983

2.18 The table below (3b) sets out the impact of the resource assumptions. Overall resources are currently not anticipated to be significantly changed (although this may be affected by future government announcements). Assumptions include

- No overall change to Settlement Funding Assessment (SFA), which is a combination of retained business rates, the ‘top up’ or ‘tariff’ to be received based on comparison of retained levels of business rates and the government’s assessment of the ‘target’ level of funding, and Revenue Support Grant (RSG).
- Council tax is assumed as set out in table 2.

- Recurrent government grants are assumed as stable overall, but with a £2m per year reduction in New Homes Bonus (NHB).
- Noon-recurrent government grants assume that a further £5m of funding is provided against the impact of the pandemic.

2.19 Overall recurrent resources are estimated in the base-case as £320.9m in 2022/23, rising to £345.6m by 2025/26 (an increase of £24m – 7.7% - overall, or £6m - 1.9% per year).

Table 3b: 2021-2026 MTFs: base-case resource estimates

2021/22		2022/23	2023/24	2024/25	2025/26
£m	Forecast Resources - Base Scenario	£m	£m	£m	£m
(38.700)	Business Rates (inc. core S31 Grants)	(38.700)	(38.700)	(38.700)	(38.700)
(19.731)	Business Rates Top Up / (Tariff)	(19.731)	(19.731)	(19.731)	(19.731)
0.000	London net pooling benefit with no SIP	0.000	0.000	0.000	0.000
0.000	Share of Collection Fund Deficit (unfunded)	0.000	0.000	0.000	0.000
(6.318)	Revenue Support Grant	(6.318)	(6.318)	(6.318)	(6.318)
(64.749)	Total Settlement Funding Assessment	(64.749)	(64.749)	(64.749)	(64.749)
(192.392)	Council Tax - General Element	(201.817)	(209.950)	(220.510)	(231.601)
(5.659)	Council Tax - Social Care Precept	(1.998)	(4.117)	(4.324)	(4.542)
(198.051)	Council Tax Income	(203.815)	(214.067)	(224.834)	(236.143)
(17.817)	Public Health Grant	(17.817)	(17.817)	(17.817)	(17.817)
(9.339)	Improved Better Care Fund Grant	(9.339)	(9.339)	(9.339)	(9.339)
(8.260)	New Homes Bonus Grant	(6.260)	(4.260)	(2.260)	0.000
(8.606)	Social Care Grant	(8.606)	(8.606)	(8.606)	(8.606)
(4.795)	Homelessness Grant	(4.795)	(4.795)	(4.795)	(4.795)
(2.235)	PFI Credit Grant	(2.235)	(2.235)	(2.235)	(2.235)
0.000	London Crime Prevention Fund	0.000	0.000	0.000	0.000
0.000	Housing Benefit and Council Tax Administration Grant	0.000	0.000	0.000	0.000
(1.357)	Housing Benefit Administration Subsidy Grant	(1.357)	(1.357)	(1.357)	(1.357)
(0.556)	Council Tax Administration Grant	(0.556)	(0.556)	(0.556)	(0.556)
(1.340)	Independent Living Fund Grant	(1.340)	(1.340)	(1.340)	0.000
(54.305)	Other Grants: Recurrent (see also below)	(52.305)	(50.305)	(48.305)	(44.705)
(317.105)	Sub-Total Recurrent Resources	(320.869)	(329.121)	(337.888)	(345.597)
(10.225)	Covid-19 Grant	(5.000)	0.000	0.000	0.000
(5.184)	Local Council Tax Support Grant	0.000	0.000	0.000	0.000
(0.587)	New Lower Tier Services Grant	0.000	0.000	0.000	0.000
(15.996)	Other Grants: Non-Recurrent	(5.000)	0.000	0.000	0.000
(333.101)	Total Resources - Base Case	(325.869)	(329.121)	(337.888)	(345.597)

2.20 Table 3c sets out the impact of estimated spending and resources and summarised the overall MTFs position as a deficit of £15.7m in 2022/23 rising to £73.4m by 2025/26 (the deficit position is table before any new savings proposed; current indications are that £12.8m of savings have been identified so far for application in 2022/23, rising to £18.5m by the end of the MTFs period; these savings need to be discussed formally by them

committees before being formally included in financial plans, and some may not be progressed).

Table 3c: 2021-2026 MTFS: base-case summary (Scenario B)

2021/22		2022/23	2023/24	2024/25	2025/26
£m	<u>MTFS Summary - Base Scenario</u>	£m	£m	£m	£m
333.101	Expenditure	342.102	369.561	394.431	418.983
(333.101)	Resources	(325.869)	(329.121)	(337.888)	(345.597)
(0.000)	Cumulative (Surplus)/Shortfall to Balanced Budget	16.233	40.441	56.543	73.386
0.000	Funding from Earmarked Reserves (under review)	(0.519)	0.000	0.000	0.000
(0.000)	Net Cumulative (Surplus)/Shortfall to Balanced Budget	15.714	40.441	56.543	73.386

MTFS: scenarios

- 2.21 The following paragraphs outline 3 different scenarios and highlight the impact of changes to key variables in each one (social care precept increases assumed; the value of (unmitigated) service cost pressures; and Spending Review).
- 2.22 It is important to set out that the variables in the three scenarios are not interdependent and therefore it is not necessarily the case that all the assumptions under any one of the scenarios will all be correct, e.g. if we received a more favourable spending review outcome, we may not need to increase council tax and the social care precept to the maximum flexibility (whereas scenario A assumes both of these to happen).
- 2.23 Scenario A and scenario C are intended to act as perimeters of what officers reasonably think the revenue maximised and revenue minimised position could look like and are only to be seen as illustrative of outcomes that could transpire based on various variables.
- 2.24 Scenario A: This creates a benefit of £16.2m in 2022/23m rising to nearly £15.8m by the end of the planning period. This is shown below. It assumes:
- Council tax and Social Care Precept are agreed to be increased at the maximum permitted in 2022/23, i.e., 1.99% and 2%;
 - Service pressures are reduced from current estimates by 33% (through offsetting efficiencies); and
 - Current levels of recurrent government grants do not diminish (i.e. no reduction in NHB), and there is a further £5m funding for Covid related expenditure.
- 2.25 Overall, this scenario leads to a near-breakeven in 2022/23, with a deficit rising to an estimated £57.6m by the end of the MTFS (before any savings which may be approved). This outcome is possible but with the increasing pressures in social care (and other services), uncertainty around further cuts to local government and no confirmation around SCP, it is risky to assume all the benefit set out in this scenario.

Table 4a: Scenario A

MTFS: Scenario A	2022/23	2023/24	2024/25	2025/26
	£m	£m	£m	£m
base case (scenario B) deficit	16.233	40.441	56.543	73.386
changes to base case assumptions for uncertain items				
council tax - general rate increase from +1.00% to +1.99% in 2022/23	(1.978)	(4.087)	(4.205)	(4.327)
council tax - social care precept increase from +1% to +2% in 2022/23 (values reflect 2022/23 increase and residual impact in later years arising from increase in the council tax base)	(1.998)	(0.080)	(0.084)	(0.089)
service pressures are reduced by 33%	(5.229)	(3.480)	(3.471)	(3.367)
changes to estimated recurrent grants arising from the settlement (reverses assumed loss from current level of NHB shown in base case)	(2.000)	(4.000)	(6.000)	(8.000)
changes to non-recurrent (Covid-19) grants	(5.000)	0.000	0.000	0.000
impact of uncertain items in scenario A	(16.205)	(11.648)	(13.761)	(15.782)
resulting deficit/(surplus) in scenario A	0.028	28.793	42.782	57.604

2.26 **Scenario B (Base-case):** Using the assumptions set out above (para 2.14 ff) creates a deficit of £16.2m in 2022/23 rising to £73.4m by 2025/26 (before any savings which may be approved by Theme Committees).

Table 4b: Scenario B

MTFS: scenario B (base case)	2022/23	2023/24	2024/25	2025/26
	£m	£m	£m	£m
summary expenditure	342.102	369.561	394.431	418.983
summary resources	(325.869)	(329.121)	(337.888)	(345.597)
deficit in scenario B (base case)	16.233	40.441	56.543	73.386

2.27 **Scenario C:** This creates a cost of £9.2m in 2022/23m which largely persists through the MTFS period. This is shown below. It assumes:

- No increase to Council tax and Social Care Precept in 2022/23;
- Service pressures increase by 33% above the level in the base-case, and
- Current levels of recurrent government grants are not increased, and for NHB is reduced by £2m a year for the remainder of the MTFS period (as in the base case). No additional Covid-19 is assumed.

Table 4c: Scenario C

MTFS: Scenario C	2022/23	2023/24	2024/25	2025/26
	£m	£m	£m	£m
base case deficit (as above)	16.233	40.441	56.543	73.386
changes to base case assumptions for uncertain items				
council tax - general rate increase from +1.00% to +1.99% in 2022/23	1.998	4.117	4.324	4.541
council tax - social care precept increase from +1% to +2% in 2022/23 (values reflect 2022/23 increase and residual impact in later years arising from increase in the council tax base)	1.998	0.081	0.085	0.089

MTFS: Scenario C	2022/23	2023/24	2024/25	2025/26
	£m	£m	£m	£m
service pressures are increased by 33%	5.229	3.480	3.471	3.367
assumes no adverse change to current government grant estimates	0.000	0.000	0.000	0.000
assumes no additional non-recurrent (Covid-19) grants	0.000	0.000	0.000	0.000
impact of uncertain items in scenario C	9.225	7.678	7.880	7.997
resulting deficit/(surplus) in scenario C	25.458	48.118	64.423	81.383

2.28 Overall, this scenario leads to a £25m deficit in 2022/23, rising to an estimated £81.4m by the end of the MTFS (before any savings which may be approved).

Securing a balanced budget in 2022/23

2.29 Considering the range of possible outcomes set out above, and focussing on the base case (scenario B), the following require inputs from councillors, partner agencies, and officers, including:

- Theme committees to put forward efficiencies, savings, or revenue generation opportunities that can be secured.
- Consideration of the impacts arising from the Spending Review announcements on 27 October 2021 and the Local Government Financial Settlement in December 2021.
- Local decisions, following consultation, on any council tax increases or any social care precept that may be levied.

3. ROUTINE FINANCIAL MATTERS

2021/22 Budget Management

3.1 18-25 years service (Children's and Family Services). It is proposed to vire £0.900m from contingency budgets to the 18-25 years service. This is to address ongoing pressures relating to case complexity and increased average costs. This virement is expected to mitigate the pressure reported in the current year (2021/22) and also the anticipated pressure in future years.

Capital programme

3.2 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.

3.3 The Capital Programme, incorporating changes approved at this Committee's June and July 2021 meetings. Changes related to the 2021/22 forecasted outturn position, and subsequent additions, is described in the following sections

Table 6: Movement from the June 2021 to the September 2021 Capital Programme

Budget Movement Type	2021-22	2022-23	2023-24	2024-25	2025-26	Total
	£000	£000	£000	£000	£000	£000
June 2021 P&R Revised Programme	509,688	212,377	129,188	83,124	0	934,377
Slippage/ Acceleration	(125,900)	534	31,125	29,257	64,984	0
Additions	6,035	13,432	4,689	4,221	0	28,377
Deletions	(2,356)	(4,105)	(124)	(67)	0	(6,653)
Sept 2021 P&R Revised Programme	387,466	222,238	164,878	116,536	64,984	956,102

3.4 The revised programme from 2021/22 will total £956m as summarised by Theme Committee in the below table:

Table 7: Summary of Proposed Capital Programme by Theme Committee

Theme Committee	2021-22	2022-23	2023-24	2024-25	2025-26	Total
	£000	£000	£000	£000	£000	£000
Adults and Safeguarding	5,611	4,602	4,344	2,765		17,322
Housing and Growth (Brent Cross)	134,126	36,609	43,425			214,160
Housing and Growth (Other)	112,266	74,395	60,626	50,967	19,649	317,903
Children, Education & Safeguarding	16,338	19,427	5,514			41,279
Community Leadership and Libraries	330	200	200			730
Environment	24,315	10,961	8,060	6,383		49,719
Policy & Resources	22,884	2,476	600	600		26,560
Total - General Fund	315,869	148,671	122,770	60,715	19,649	667,673
Housing Revenue Account	71,597	73,567	42,108	55,821	45,335	288,429
Total - All Services	387,466	222,238	164,878	116,536	64,984	956,102

Slippage and Acceleration

3.5 A total of £129.333m has been slipped out of the 2021/22 financial year into future periods, with £3.433m accelerated into future years.

3.6 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.

3.7 The breakdown of net slippage and acceleration by Committee is shown below:

Table 8: Summary of Net Slippage by Theme Committee

Theme Committee	Slippage	Acceleration	Net change
	£000	£000	£000
Adults and Safeguarding	(217)	14	(204)
Housing and Growth (Brent Cross)	(27,927)	0	(27,927)
Housing and Growth (Other)	(44,779)	0	(44,779)
Children, Education & Safeguarding	(11,595)	0	(11,595)
Community Leadership and Libraries	0	0	0
Environment	(2,769)	0	(2,769)
Policy & Resources	(1,876)	0	(1,876)
Housing Revenue Account	(40,170)	3,419	(36,751)
Total at Month 4	(129,333)	3,433	(125,900)

Additions

- 3.8 Enforcement - CCTV (£0.730m) – Project to create a coordinated and centralised strategic CCTV operations in the Borough. This will result in a reduction in costs and a strategic approach to procurement of service contracts and CCTV components. This programme will be funded through CIL.
- 3.9 Firestopping works and other necessary maintenance works at care homes (£5.211m) - This will provide assurance to the vulnerable residents that the care homes they live in are safe and meet Fire and other Safety regulations.
- 3.10 Colindale Modifications (to support revised working arrangements for staff, post-pandemic; £0.188m) - With certain services supporting this change it has allowed us to vacate the 8th Floor, letting it to a commercial tenant. In addition, the reconfiguration of the 4th Floor as a collaborative working space for HR, Growth and Corporate Services, Public Health and Finance staff will allow those services to showcase the new ways of working and give others services the chance to explore and see how it could work for them. This is part of the ‘future of work’ programme.
- 3.11 Greenspaces Infrastructure Programme (£0.02m) – Access to Barnet branded vehicle for use in storms provides employee care when working in potentially hazardous conditions.
- 3.12 Housing Revenue Account (£22.228m) - The HRA additions relate to the stock Capital investment programmes, where resources have been accelerated from future years in the Business plan (beyond the timescales of the existing 5-year capital programme). These additions bring the HRA capital programmes in line with the current 30-year Business Plan. They are all funded from PWLB Borrowing. These include:
- M&E/ Gas (£1.784m)
 - Miscellaneous Repairs (£10.622m)
 - Major Works (£9.735m)
 - Extra Care – Housing (Cheshir) (£0.087m)

Budget movements

- 3.13 School place planning (Secondary) (£0.644m) – Transferring £0.644m Koshier Kitchen budget to School place planning (Secondary) budget. Pre-approved and funded from Grant and Contributions.
- 3.14 New Build Housing (Open Door) (£1.336m) – Transferring £1.336m Micro site development for affordable housing to budget to New Build Housing (Open Door) budget. Pre-approved and funded from Borrowing.

Total Additions

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

Table 9: Summary of Proposed Additions

Additions	2021-22	2022-23	2023-24	2024-25	2025-26	Total
	£000	£000	£000	£000	£000	£000
Enforcement - CCTV	330	200	200	0	0	730
Firestopping works and other urgent maintenance works at care homes	0	5,211	0	0	0	5,211
COLINDALE MODIFICATIONS (future of work – 'FOW')	188	0	0	0	0	188
Greenspaces Infrastructure Programme	20	0	0	0	0	20
Major Works (excl Granv Rd)	0	0	1,416	368	0	1,784
Miscellaneous Repairs	566	3,023	3,073	3,073	0	9,735
M&E/ GAS	4,932	4,998	0	692	0	10,622
Extra Care - housing (Cheshir)	0	0	0	87	0	87
Total at Month 4	6,036	13,432	4,689	4,220	0	28,377

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

Table 10: Summary of Changes Proposed to Revised Capital Programme

Theme Committee	Net Slippage & Accelerated Spend	Deletions	Additions
	£000	£000	£000
Adults and Safeguarding	(204)	0	0
Housing and Growth (Brent Cross)	(27,927)	(4,000)	0
Housing and Growth (Other)	(44,779)	(0)	5,399
Children, Education & Safeguarding	(11,595)	0	0
Community Leadership and Libraries	0	0	730
Environment	(2,769)	0	20
Policy & Resources	(1,876)	0	0
Housing Revenue Account	(36,751)	(2,653)	22,228
Total at Month 4	(125,900)	(6,653)	28,377

3.17 The capital programme shown in paragraph 1.6.2 was approved to be funded from the following sources:

Table 11: Summary of Financing for Proposed Capital Programme

Theme Committee	Grants	S106	Capital Receipts	RCCO/MRA	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000
Adults and Safeguarding	12,439	417	90		3,997	379	17,322
Housing and Growth (Brent Cross)	200,281		900			12,979	214,160
Housing and Growth (Other)	53,537	8,703	15,121	491	15,035	225,016	317,903
Children, Education & Safeguarding	38,722	2	342		406	1,805	41,279
Community Leadership and Libraries					730		730
Environment	687	4,095	428		7,868	36,641	49,719
Policy & Resources	1		1,108		5,000	20,451	26,560
Total - General Fund	305,667	13,218	17,988	491	33,036	297,272	667,673
Housing Revenue Account	19,992		3,352	78,823		186,262	288,429
Total - All Services	325,660	13,218	21,340	79,314	33,036	483,534	956,102

Borrowing

3.18 £483.534m of the total capital programme will be funded from borrowing of which £153.500m is to be on-lent to Opendoor Homes for the acquisition or delivery of new housing.

- 3.19 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

- 3.20 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.
- 3.21 £21.340m of the above capital programme is planned to be funded by capital receipts. Current receipts are standing at £17.476m with £16.088m HRA receipts and £1.389m General Fund receipts.
- 3.22 Of the £10.775m Capital receipts planned to fund expenditure in 2021/22, £3.979m will be funded from HRA capital receipt (RTB Receipts) relating to Open Door New Build Housing (this is shown in the above table under Housing and Growth (Other)). The remaining £6.796m is expected to come from General Fund capital receipts. To date the council has received £1.389m from General Fund disposals, with £3.569m capital receipts forecast this financial year. The current forecasted Capital Receipt shortfall will be £3.227m General Fund and may need to be funded by additional borrowing.
- 3.23 Current HRA capital receipt balances plus future estimates suggest that there will be enough HRA capital receipts to fund the relevant projects.

Capital Grants & Contributions

- 3.24 The current capital programme shows £325.660m to be funded from Capital Grants. S106 and CIL are standing at £13.218m and £33.036m respectively.
- 3.25 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).
- 3.26 S106 contributions are a developer contribution towards infrastructure; restricted to a specific area and timeframe. Community Infrastructure Levy (CIL) funds are developer contribution towards infrastructure; can be used borough wide but still has time restrictions on use.
- 3.27 Current capital programme forecasts plus future estimates suggest that there will be enough S106 contributions to fund the relevant projects.

4. REASONS FOR RECOMMENDATIONS

- 4.1 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.

4.2 This report also includes ongoing budget maintenance in the form of virements and the allocation of contingency funds to ensure strong financial management.

4.3 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.

5. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

5.1 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.

6. POST DECISION IMPLEMENTATION

6.1 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.

7. IMPLICATIONS OF DECISION

7.1 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.

7.2 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.

7.3 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.

7.4 **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.

7.5 **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.

7.6 **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.

7.7 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>

7.8 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.

7.9 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 2021. 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 (i) – Base-Case MTFS

2021/22		2022/23	2023/24	2024/25	2025/26
£m	<u>MTFS Summary - Base Scenario</u>	£m	£m	£m	£m
333.101	Expenditure	342.102	369.561	394.431	418.983
(333.101)	Resources	(325.869)	(329.121)	(337.888)	(345.597)
(0.000)	Cumulative (Surplus)/Shortfall to Balanced Budget	16.233	40.441	56.543	73.386
0.000	Funding from Earmarked Reserves (under review)	(0.519)	0.000	0.000	0.000
(0.000)	Net Cumulative (Surplus)/Shortfall to Balanced Budget	15.714	40.441	56.543	73.386
	Savings / Efficiencies Proposed to Date	(12.819)	(14.867)	(18.106)	(18.489)
0.000	Gap to Balanced Budget excl undertain items	2.895	25.574	38.437	54.897

2021/22		2022/23	2023/24	2024/25	2025/26
£m	<u>Forecast Expenditure - Base Scenario</u>	£m	£m	£m	£m
309.535	Base Expenditure Budget	333.101	342.102	369.561	394.431

3.271	Inflation - Non Pay	3.204	3.912	4.413	4.413
2.179	Inflation - Pay	3.327	3.382	3.437	3.437
1.500	North London Waste Authority levy	1.500	1.500	1.500	1.500
0.659	Capital Financing (MRP)	0.220	0.000	0.000	0.000
0.500	Pensions: Employer Contribution and Deficit Recovery	0.000	0.000	0.000	0.000
8.110	Statutory / Cost Drivers Sub Total	8.252	8.793	9.350	9.350

10.225	Covid-19 Grant: Expenditure	(10.225)	0.000	0.000	0.000
9.283	Service Pressures and Investment	15.844	10.546	10.519	10.202
6.982	Contingency - general risks	0.000	5.000	5.000	5.000
1.000	Council Tax Discretionary Payment	(1.000)	0.000	0.000	0.000
(2.130)	Concessionary Fares (Freedom Pass)	(3.869)	3.120	0.000	0.000
25.360	Service Expenses sub total	0.750	18.666	15.519	15.202

0.341	Public Health Grant increase	0.000	0.000	0.000	0.000
0.346	Housing Benefit and Council Tax Administration Grant	0.000	0.000	0.000	0.000
0.000	Flexible Homelessness Support Grant	0.000	0.000	0.000	0.000
0.686	Grant Income grossed up	0.000	0.000	0.000	0.000
343.691	Forecast Expenditure (Before Savings; Base case)	342.102	369.561	394.431	418.983
(10.590)	Approved Savings/ Further Efficiencies Required	0.000	0.000	0.000	0.000
333.101	Forecast Expenditure (After Savings)	342.102	369.561	394.431	418.983

2021/22		2022/23	2023/24	2024/25	2025/26
£m	<u>Forecast Resources - Base Scenario</u>	£m	£m	£m	£m
(38.700)	Business Rates (inc. core S31 Grants)	(38.700)	(38.700)	(38.700)	(38.700)
(19.731)	Business Rates Top Up / (Tariff)	(19.731)	(19.731)	(19.731)	(19.731)
0.000	London net pooling benefit with no SIP	0.000	0.000	0.000	0.000
0.000	Share of Collection Fund Deficit (unfunded)	0.000	0.000	0.000	0.000
(6.318)	Revenue Support Grant	(6.318)	(6.318)	(6.318)	(6.318)
(64.749)	Total Settlement Funding Assessment	(64.749)	(64.749)	(64.749)	(64.749)

2021/22		2022/23	2023/24	2024/25	2025/26
£m	<u>MTFS Summary - Base Scenario</u>	£m	£m	£m	£m
(192.392)	Council Tax - General Element	(201.817)	(209.950)	(220.510)	(231.601)
(5.659)	Council Tax - Social Care Precept	(1.998)	(4.117)	(4.324)	(4.542)
(198.051)	Council Tax Income	(203.815)	(214.067)	(224.834)	(236.143)
(17.817)	Public Health Grant	(17.817)	(17.817)	(17.817)	(17.817)
(9.339)	Improved Better Care Fund Grant	(9.339)	(9.339)	(9.339)	(9.339)
(8.260)	New Homes Bonus Grant	(6.260)	(4.260)	(2.260)	0.000
(8.606)	Social Care Grant	(8.606)	(8.606)	(8.606)	(8.606)
(4.795)	Homelessness Grant	(4.795)	(4.795)	(4.795)	(4.795)
(2.235)	PFI Credit Grant	(2.235)	(2.235)	(2.235)	(2.235)
0.000	London Crime Prevention Fund	0.000	0.000	0.000	0.000
0.000	Housing Benefit and Council Tax Administration Grant	0.000	0.000	0.000	0.000
(1.357)	Housing Benefit Administration Subsidy Grant	(1.357)	(1.357)	(1.357)	(1.357)
(0.556)	Council Tax Administration Grant	(0.556)	(0.556)	(0.556)	(0.556)
(1.340)	Independent Living Fund Grant	(1.340)	(1.340)	(1.340)	0.000
(54.305)	Other Grants: Recurrent (see also below)	(52.305)	(50.305)	(48.305)	(44.705)
(317.105)	Sub-Total Recurrent Resources	(320.869)	(329.121)	(337.888)	(345.597)
(10.225)	Covid-19 Grant	(5.000)	0.000	0.000	0.000
(5.184)	Local Council Tax Support Grant	0.000	0.000	0.000	0.000
(0.587)	New Lower Tier Services Grant	0.000	0.000	0.000	0.000
(15.996)	Other Grants: Non-Recurrent	(5.000)	0.000	0.000	0.000
(333.101)	Total Resources - Base Case	(325.869)	(329.121)	(337.888)	(345.597)

Appendix A(ii) – MTFS Overlays; Scenarios A, B (base case), and C.

MTFS: Scenario A	2022/23	2023/24	2024/25	2025/26
	£m	£m	£m	£m
base case (scenario B) deficit	16.233	40.441	56.543	73.386
changes to base case assumptions for uncertain items				
council tax - general rate increase from +1.00% to +1.99% in 2022/23	(1.978)	(4.087)	(4.205)	(4.327)
council tax - social care precept increase from +1% to +2% in 2022/23 (values reflect 2022/23 increase and residual impact in later years arising from increase in the council tax base)	(1.998)	(0.080)	(0.084)	(0.089)
service pressures are reduced by 33%	(5.229)	(3.480)	(3.471)	(3.367)
changes to estimated recurrent grants arising from the settlement (reverses assumed loss from current level of NHB shown in base case)	(2.000)	(4.000)	(6.000)	(8.000)
changes to non-recurrent (Covid-19) grants	(5.000)	0.000	0.000	0.000
impact of uncertain items in scenario A	(16.205)	(11.648)	(13.761)	(15.782)
resulting deficit/(surplus) in scenario A	0.028	28.793	42.782	57.604

MTFS: scenario B (base case)	2022/23	2023/24	2024/25	2025/26
	£m	£m	£m	£m
summary expenditure	342.102	369.561	394.431	418.983
summary resources	(325.869)	(329.121)	(337.888)	(345.597)
deficit in scenario B (base case)	16.233	40.441	56.543	73.386

MTFS: Scenario C	2022/23	2023/24	2024/25	2025/26
	£m	£m	£m	£m
base case deficit (as above)	16.233	40.441	56.543	73.386
changes to base case assumptions for uncertain items				
council tax - general rate increase from +1.00% to +1.99% in 2022/23	1.998	4.117	4.324	4.541
council tax - social care precept increase from +1% to +2% in 2022/23 (values reflect 2022/23 increase and residual impact in later years arising from increase in the council tax base)	1.998	0.081	0.085	0.089
service pressures are increased by 33%	5.229	3.480	3.471	3.367
assumes no adverse change to current government grant estimates	0.000	0.000	0.000	0.000
assumes no additional non-recurrent (Covid-19) grants	0.000	0.000	0.000	0.000
impact of uncertain items in scenario C	9.225	7.678	7.880	7.997
resulting deficit/(surplus) in scenario C	25.458	48.118	64.423	81.383

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Appendix B (i) – Capital Programme; Additions, Deletions, Slippage, Accelerated Spend

Year	Theme	Programme	Deletions/ Transfers	Additions	Net Slippage & Accelerated Spend	Explanation For Request	Funding
2021-22	Adults and Safeguarding	Disabled Facilities Grants Programme			14	Budget Reprofile	Grant and Contributions
2021-22	Adults and Safeguarding	Gaelic playing pitch relocation			(217)	Budget Reprofile	S106
2021-22	Housing and Growth (Brent Cross)	BXC - Funding for land aquisition			(8,604)	Budget Reprofile	Borrowing
2021-22	Housing and Growth (Brent Cross)	Thames Link Station			(2,422)	Budget Reprofile	Grant and Contributions
2021-22	Housing and Growth (Brent Cross)	Critical Infrastructure			(5,641)	Budget Reprofile	Grant and Contributions
2021-22	Housing and Growth (Brent Cross)	BXS Land Acquisitions			(11,260)	Budget Reprofile	Grant and Contributions
2021-22	Housing and Growth (Other)	Hermitage Lane - mixed tenure residential conversion			(1,034)	Budget Reprofile	Borrowing
2021-22	Housing and Growth (Other)	New Build Housing (Open Door)			(3,800)	Budget Reprofile	Borrowing
2021-22	Housing and Growth (Other)	Housing acquisitions Open Door			(17,700)	Budget Reprofile	Borrowing
2021-22	Housing and Growth (Other)	The Burroughs, Hendon			(3,710)	Budget Reprofile	Borrowing
2021-22	Housing and Growth (Other)	Micro site development for affordable housing			(50)	Budget Reprofile	Grant and Contributions
2021-22	Housing and Growth (Other)	Mixed tenure housing programme (Tranche 1)			(677)	Budget Reprofile	S106
2021-22	Housing and Growth (Other)	Development Portfolio			(500)	Budget Reprofile	Capital Receipts
2021-22	Housing and Growth (Other)	ULF GF SAGE (142)			(16,159)	Budget Reprofile	Grant and Contributions
2021-22	Housing and Growth (Other)	Milespit Cemetary Works			(1,149)	Budget Reprofile	Borrowing
2021-22	Children, Education & Safeguarding	Modernisation - Primary & Secondary			(2,303)	Budget Reprofile	Grant and Contributions
2021-22	Children, Education & Safeguarding	Saracens Primary			(651)	Budget Reprofile	Grant and Contributions
2021-22	Children, Education & Safeguarding	Grammar school projects			(3,287)	Budget Reprofile	Grant and Contributions
2021-22	Children, Education & Safeguarding	Oakleigh SEN			(778)	Budget Reprofile	Grant and Contributions
2021-22	Children, Education & Safeguarding	School place planning (Primary)			(786)	Budget Reprofile	Grant and Contributions
2021-22	Children, Education & Safeguarding	School place planning (Secondary)			(1,396)	Budget Reprofile	Grant and Contributions
2021-22	Children, Education & Safeguarding	SEN			(1,442)	Budget Reprofile	Grant and Contributions
2021-22	Children, Education & Safeguarding	Early Education and Childcare place sufficiency			(231)	Budget Reprofile	CIL
2021-22	Children, Education & Safeguarding	Loft conversion and extension policy for Foster Carers			(179)	Budget Reprofile	Borrowing
2021-22	Children, Education & Safeguarding	Meadow Close Children's Homes			(49)	Budget Reprofile	Borrowing
2021-22	Children, Education & Safeguarding	Family Services Estate - building compliance, extensive R&M, H&S, DDA			(468)	Budget Reprofile	Capital Receipts
2021-22	Children, Education & Safeguarding	Placement Demand Transformation			(25)	Budget Reprofile	Borrowing
2021-22	Environment	Park Infrastructure			(28)	Budget Reprofile	Borrowing

2021-22	Environment	Data Works Management system			(102)	Budget Reprofile	Capital Receipts
2021-22	Environment	Vehicles			(2,393)	Budget Reprofile	Borrowing
2021-22	Environment	Green spaces development project			(246)	Budget Reprofile	Borrowing
2021-22	Policy & Resources	Depot relocation			(1,876)	Budget Reprofile	CIL
2021-22	Housing Revenue Account	Major Works (excl Granv Rd)			(642)	Budget Reprofile	RCCO/ MRA
2021-22	Housing Revenue Account	Accessible accommodation adaptations			(218)	Budget Reprofile	RCCO/ MRA
2021-22	Housing Revenue Account	Regeneration			303	Budget Reprofile	RCCO/ MRA
2021-22	Housing Revenue Account	New Build - 250 units			(7,937)	Budget Reprofile	Borrowing
2021-22	Housing Revenue Account	Dollis Valley - property acquisitions			(2,500)	Budget Reprofile	Borrowing
2021-22	Housing Revenue Account	Extra Care - housing (Stag)			1,939	Budget Reprofile	Borrowing
2021-22	Housing Revenue Account	Extra Care - housing (Cheshir)			(9,417)	Budget Reprofile	Borrowing
2021-22	Housing Revenue Account	Burnt Oak Broadway Flats - additional storey			(1,000)	Budget Reprofile	Grant and Contributions
2021-22	Housing Revenue Account	Regen Stock Additional Investment			(5,424)	Budget Reprofile	Borrowing
2021-22	Housing Revenue Account	Barnet Homes GLA development programme			(12,565)	Budget Reprofile	Borrowing
2021-22	Housing Revenue Account	HRA Fire Safety Programme			1,177	Budget Reprofile	Borrowing
2021-22	Housing Revenue Account	Graham Park NE			(468)	Budget Reprofile	Borrowing
2021-22	Children, Education & Safeguarding	Kosher Kitchen	(644)			Budget Virement	Grant and Contributions
2021-22	Children, Education & Safeguarding	School place planning (Secondary)	644			Budget Virement	Grant and Contributions
2021-22	Community Leadership and Libraries	Enforcement - CCTV		330		Budget Additions	CIL
2022-23	Community Leadership and Libraries	Enforcement - CCTV		200		Budget Additions	CIL
2023-24	Community Leadership and Libraries	Enforcement - CCTV		200		Budget Additions	CIL
2021-22	Housing and Growth (Other)	New Build Housing (Open Door)	1,336			Budget Virement	Borrowing
2021-22	Housing and Growth (Other)	Micro site development for affordable housing	(1,336)			Budget Virement	Borrowing
2022-23	Housing and Growth (Other)	Firestopping works and other urgent maintenance works at care homes		5,211		Budget Additions	Borrowing
2021-22	Housing and Growth (Other)	COLINDALE MODIFICATIONS (future of work)		188		Budget Additions	Borrowing
2021-22	Environment	Greenspaces Infrastructure Programme		20		Budget Additions	Capital Receipts
2022-23	Brent Cross	Critical Infrastructure	(4,000)			Budget Not required	Grant and Contributions
2023-24	Housing Revenue Account	Major Works (excl Granv Rd)		1,416		Budget Additions	Borrowing
2024-25	Housing Revenue Account	Major Works (excl Granv Rd)		368		Budget Additions	Borrowing
2022-23	Housing Revenue Account	Regeneration	(90.980)			Budget Not required	RCCO/ MRA
2023-24	Housing Revenue Account	Regeneration	(124.000)			Budget Not required	RCCO/ MRA
2024-25	Housing Revenue Account	Regeneration	(67.000)			Budget Not required	RCCO/ MRA
2021-22	Housing Revenue Account	Miscellaneous Repairs		566		Budget Additions	Borrowing
2022-23	Housing Revenue Account	Miscellaneous Repairs		3,023		Budget Additions	Borrowing
2023-24	Housing Revenue Account	Miscellaneous Repairs		3,073		Budget Additions	Borrowing
2024-25	Housing Revenue Account	Miscellaneous Repairs		3,073		Budget Additions	Borrowing
2021-22	Housing Revenue Account	M&E/ GAS		4,932		Budget Additions	Borrowing

2022-23	Housing Revenue Account	M&E/ GAS		4,998		Budget Additions	Borrowing
2024-25	Housing Revenue Account	M&E/ GAS		692		Budget Additions	Borrowing
2021-22	Housing Revenue Account	Regen Stock Additional Investment	(1,820.30)			Budget Not required	Borrowing
2021-22	Housing Revenue Account	Voids and Lettings	(536)			Budget Not required	RCCO/ MRA
2022-23	Housing Revenue Account	Voids and Lettings	(14)			Budget Not required	RCCO/ MRA
2024-25	Housing Revenue Account	Extra Care - housing (Cheshir)		87		Budget Additions	Borrowing
			(6,653)	28,377	(125,900)		

Appendix B (ii) Proposed Capital Programme by Theme Committee

Theme Committee	2021-22	2022-23	2023-24	2024-25	2025-26	Total	Grants	S106	Capital Receipts	RCCO/ MRA	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Adults and Safeguarding	5,611	4,602	4,344	2,765		17,322	12,439	417	90		3,997	379	17,322
Housing and Growth (Brent Cross)	134,126	36,609	43,425			214,160	200,281		900			12,979	214,160
Housing and Growth (Other)	112,266	74,395	60,626	50,967	19,649	317,903	53,537	8,703	15,121	491	15,035	225,016	317,903
Children, Education & Safeguarding	16,338	19,427	5,514			41,279	38,722	2	342		406	1,805	41,279
Community Leadership and Libraries	330	200	200			730					730		730
Environment	24,315	10,961	8,060	6,383		49,719	687	4,095	428		7,868	36,641	49,719
Policy & Resources	22,884	2,476	600	600		26,560	1		1,108		5,000	20,451	26,560
Total - General Fund	315,869	148,671	122,770	60,715	19,649	667,673	305,667	13,218	17,988	491	33,036	297,272	667,673
Housing Revenue Account	71,597	73,567	42,108	55,821	45,335	288,429	19,992		3,352	78,823		186,262	288,429
Total - All Services	387,466	222,238	164,878	116,536	64,984	956,102	325,660	13,218	21,340	79,314	33,036	483,534	956,102

Adults and Safeguarding	2021-22	2022-23	2023-24	2024-25	2025-26	Total	Grants	S106	Capital Receipts	RCCO/MRA	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Sport and Physical Activities	540					540	450		90				540
Community Equipment and Assistive Technology	1,417	1,310	1,270			3,997					3,997		3,997
Investing in IT	379					379		0				379	379
Disabled Facilities Grants Programme	3,074	3,074	3,074	2,765		11,988	11,988						11,988
Gaelic playing pitch relocation	200	217				417		417					417
	5,611	4,602	4,344	2,765		17,322	12,439	417	90		3,997	379	17,322

Housing and Growth (Brent Cross)	2021-22	2022-23	2023-24	2024-25	2025-26	Total	Grants	S106	Capital Receipts	RCCO/MRA	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
BXC - Funding for land acquisition	1,372	480	8,627			10,479						10,479	10,479
Thames Link Station	111,397	25,288	16,806			153,491	150,991					2,500	153,491
Critical Infrastructure	16,114	10,580	3,567			30,261	29,361		900				30,261
Strategic Infrastructure Fund													
BXS Land Acquisitions	5,243	261	14,425			19,929	19,929						19,929
	134,126	36,609	43,425			214,160	200,281		900			12,979	214,160

Children, Education & Safeguarding	2021-22	2022-23	2023-24	2024-25	2025-26	Total	Grants	S106	Capital Receipts	RCCO/MRA	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Modernisation - Primary & Secondary	3,716	2,303				6,018	6,018						6,018
Healthy Pupils Fund													
Orion Primary School													
Monkfrith							0						0
St Agnes	23					23	23						23
Saracens Primary	1,000	1,201				2,201	2,199	2					2,201
Kosher Kitchen													
Permanent All Through Expansion Programme													
London Academy	11					11	11						11

St Mary's & St John's Permanent Primary/Secondary(reallocation) Expansion Programme							0						0
St James / Blessed Dominic Permanent Secondary Expansion Programme	25					25	25						25
Oak Lodge Special School Grammar school projects	1,000	3,987				4,987	4,503				484		4,987
SEN Programme Oakleigh SEN	250	1,428				1,678	1,678						1,678
Claremont SEN Whitefield School ASD							(0)						(0)
Other Projects Queenswell Inf Sch, Northway Sch, Fairway Sch, Edgware Sch, Northgate Sch	110					110	110				0		110
School place planning (Primary) School place planning (Secondary)		786	842			1,628	1,628						1,628
SEN	90	752	1,256			2,098	2,098						2,098
Alternative Provision Early Education and Childcare place sufficiency	1,475	1,442	3,002			5,919	5,919						5,919
Information Management Loft conversion and extension policy for Foster Carers	7,880	6,630				14,510	14,510				406		14,510
New Park House Children's home Meadow Close Children's Homes	175	231				406							406
Family Services Estate - building compliance, extensive R&M, H&S, DDA	110	359	180			649		39				610	649
Placement Demand Transformation	323	49				372						372	372
	48	234	234			516		303				213	516
	101	25				126						126	126
	16,338	19,427	5,514			41,279	38,722	2	342		406	1,805	41,279

Community Leadership and Libraries	2021-22	2022-23	2023-24	2024-25	2025-26	Total	Grants	S106	Capital Receipts	RCCO/MRA	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Enforcement - CCTV	330	200	200			730					730		730
	330	200	200			730					730		730

Environment	2021-22	2022-23	2023-24	2024-25	2025-26	Total	Grants	S106	Capital Receipts	RCCO/MRA	CIL	Borrowing	Total
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	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
HIGHWAYS TfL - LOCAL IMPLEMENTATION PLAN													
Local Implementation Plan 2016/17 and onwards	14					14	14						14
Borough Cycling Programme													
HIGHWAYS non-TfL													
Footway Reconstruction													
Traffic Management	4					4		4					4
Highways Improvement	2,352					2,352		2,239				113	2,352
Travel Plan Implementation	91					91		91					91
Exor Asset Management System	493	134	111	13		752						752	752
Carriageways													
Highways Planned Maintenance Works Programme													
Saracens - highways works	40					40		40					40
Drainage Schemes	127					127	126					1	127
Mill Corner Drainage Scheme	1,000					1,000						1,000	1,000
Road Traffic Act - Controlled Parking Zones	50					50		49				0	50
Investment in Roads & Pavement (NRP)	1,496					1,496						1,496	1,496
Highway Asset Management/Network Recovery Plan (NRP) Phase 2	7,903	6,826	6,240	6,370		27,339					7,868	19,470	27,339
Refurbish and regenerate Hendon Cemetery and Crematorium	378					378						378	378
Hendon Cemetery & Crematorium Enhancement	10					10			10				10
Old Court House - public toilets	40					40		40					40
Parks & Open Spaces and Tree Planting													
Park Infrastructure	1,561	162				1,723	8	315				1,400	1,723
Victoria Park Infrastructure	210					210			210				210
Data Works Management system	80	102				182			182				182
Parks Equipment	1					1	1						1
Vehicles	3,500	2,735	943			7,178				1		7,177	7,178
Street cleansing and greenspaces - vehicles and equipment													
Green spaces development project	300	246				546						546	546
COVID19 Social Distancing Projects	538					538	538						538
Lines and Signs	9					9						9	9
LED Lighting	1,408					1,408						1,408	1,408
Pay and Display parking machine estate upgrade													
Moving traffic cameras	390					390						390	390

Controlled parking zones review	449	50				499						499	499
Greenspaces Infrastructure Programme	488	399	450			1,337		1,317	20				1,337
CCTV Projects Retention													
Town Centre Bays													
Parking signs and lines introduction and replenishment													
Car Parking improvement													
Rubber Crumb													
Highways (permanent re-instatement)	908					908			4			903	908
Minor Highways Improvements	474	307	316			1,097						1,097	1,097
	24,315	10,961	8,060	6,383		49,719	687	4,095	428		7,868	36,641	49,719

Housing and Growth (Other)	2021-22	2022-23	2023-24	2024-25	2025-26	Total	Grants	S106	Capital Receipts	RCCO/MRA	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Office Build													
Empty Properties	2,071	1,700				3,771			3,771				3,771
Chilvins Court Area Committee													
Out of borough acquisition													
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	4,750	1,034				5,784				491		5,292	5,784
New Build Housing (Open Door)	10,800	5,000				15,800	346	1,872	6,335			7,247	15,800
Housing acquisitions Open Door	32,250	36,000	36,000	32,250	18,950	155,450	1,950					153,500	155,450
Loan Trf 156 properties to Open door													
The Burroughs, Hendon	13,729	4,200				17,929						17,929	17,929
Pinkham Way land release	100					100	100						100
Micro site development for affordable housing	1,201	50				1,251	1,251						1,251
Decent Homes Programme													
Infrastructure Projects				5,000		5,000					5,000		5,000
Mixed tenure housing programme (Tranche 1)	600	677				1,277		1,277					1,277
Development Portfolio	2,970	1,900				4,870			4,870				4,870
ULF GF SAGE (142)	929	14,925	20,330	9,717	699	46,600	46,600						46,600
DECC - Fuel Poverty													

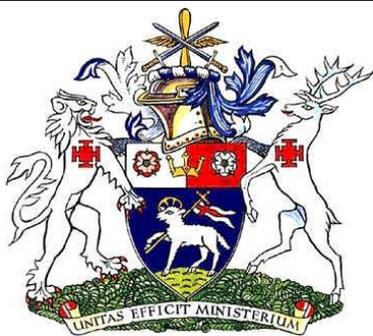
Town Centre	2,404	1,550	824			4,778	628	105			4,045		4,778
Strategic opportunities fund	24,697					24,697						24,697	24,697
Milespit Cemetary Works	333	1,149				1,482						1,482	1,482
Colindale – Highways and Transport	1,038	1,000	1,000	4,000		7,038	948	2,667			3,423		7,038
Colindale Station Works	2,858					2,858		108				2,750	2,858
Grahame Park – Community Facilities	2,108					2,108		2,108					2,108
Barnet House Exit Works													
Public Sector Decarbonisation Scheme Phase 1	1,381					1,381	1,381						1,381
Firestopping works and other urgent maintenance works at care homes	717	5,211				5,928						5,928	5,928
Window replacement at Apthore care centre	520					520						520	520
COLINDALE MODIFICATIONS (future of work)	2,444					2,444			145			2,299	2,444
FAMILY FRIENDLY HUB FITOUT	500					500						500	500
HTH AV EQUIPMENT	150					150						150	150
Brent Cross Retail Park Purchase												(0)	(0)
Colindale – Parks, Open Spaces and Sports	2,900					2,900	333				2,567		2,900
Health projects	567					567		567					567
	112,266	74,395	60,626	50,967	19,649	317,903	53,537	8,703	15,121	491	15,035	225,016	317,903

Policy & Resources	2021-22	2022-23	2023-24	2024-25	2025-26	Total	Grants	S106	Capital Receipts	RCCO/MRA	CIL	Borrowing	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Depot relocation	3,195	1,876				5,071			71		5,000		5,071
Community Centre - Tarling Road													
Asset Management	742	600	600	600		2,542	1		54			2,487	2,542
ICT strategy	802					802			802			0	802
Customer Services Transformation Programme	181					181			181				181
Implementation of Locality Strategy													
Saracen Loan	17,964					17,964						17,964	17,964
Finance IT													
Area Committee													
	22,884	2,476	600	600		26,560	1		1,108		5,000	20,451	26,560

Housing Revenue Account	2021-22	2022-23	2023-24	2024-25	2025-26	Total	Grants	S106	Capital Receipts	RCCO/MRA	CIL	Borrowing	Total
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	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Major Works (excl Granv Rd)	8,813	8,812	8,812	8,812		35,250				35,250			35,250
Accessible accommodation adaptations	460	678				1,138				1,138			1,138
Regeneration	787	250	150	150		1,337				1,337			1,337
Miscellaneous Repairs	2,560	3,023	3,073	3,073		11,729				1,994	9,735		11,729
M&E/ GAS	7,831	7,938	2,000	4,272		22,041				11,419	10,622		22,041
Voids and Lettings	3,707	3,567	3,567	3,567		14,408				14,394	14		14,408
New Build - 250 units	700	1,500	8,500	25,560	44,046	80,306						80,306	80,306
Ansell Court - extra care housing													
Dollis Valley - property acquisitions	1,200	2,500				3,700			1,110		2,590		3,700
Extra Care - housing (Stag)	8,000	4,002				12,002	1,581				10,420		12,002
Extra Care - housing (Cheshir)	539	6,646	9,006	4,987		21,178	7,197				13,981		21,178
Burnt Oak Broadway Flats - additional storey	2,237	3,454				5,691	2,514				3,177		5,691
Upper & Lower Fosters Community Led Design													
Regen Stock Additional Investment	15,540	13,591				29,131					29,131		29,131
Stag house - property purchase	97					97			32		65		97
Barnet Homes GLA development programme	200	13,000	7,000	5,400	1,289	26,889	8,700				18,189		26,889
HRA acquisitions	5,387					5,387					5,387		5,387
Silk House and Shoelands	1,965					1,965			1,965				1,965
HRA Fire and Structural repairs											0		0
HRA Fire Safety Programme	10,330	4,138				14,468				13,291	1,177		14,468
Dollis Valley CPO Payment	245					245			245				245
Graham Park NE	1,000	468				1,468					1,468		1,468
	71,597	73,567	42,108	55,821	45,335	288,429	19,992		3,352	78,823		186,262	288,429

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Policy and Resources Committee 30 September 2021 AGENDA ITEM 9

Title	Proposed Delivery and Outcomes Framework for the Barnet Plan 2021-25
Report of	Chairman of the Policy and Resources Committee
Wards	All
Status	Public
Urgent	Yes
Key	No
Enclosures	Appendix A: Clean, Safe and Well Run Appendix B: Family Friendly Appendix C: Healthy Appendix D: Thriving
Officer Contact Details	Katie Nevin, Corporate Performance & Risk Manager Katie.nevin@barnet.gov.uk

Summary

This report provides a strategic overview of the Delivery and Outcomes Framework that has been developed to enable residents and others to see whether we are achieving the objectives set out in the Barnet Plan 2021-25.

Officers Recommendations

1. That the Committee receive this report and provide comment on the enclosed appendices
2. That the Committee note the proposed reporting arrangements for the Delivery and Outcomes Framework at this Committee and the relevant Theme Committees.

1. WHY THIS REPORT IS NEEDED

- 1.1 The term Outcomes Framework has been defined as “*an agreed set of outcomes and indicators that can demonstrate whether, and to what extent, an initiative has positively contributed to improving people’s lives*”.
- 1.2 This report provides a strategic overview of the proposed Delivery and Outcomes Framework that has been developed to enable residents and others to see whether we are achieving the objectives set out in the Barnet Plan 2021-25, which was approved at Council in March 2021 and is available to view at <https://barnet.moderngov.co.uk/documents/s63856/Appendix%20A%20BARNET%20Corporate%20plan%202021%20-%202025.pdf>
- 1.3 The proposed framework focuses on the key activities being carried out under each objective and the most appropriate way of measuring the success and / or progress of these activities, whether that be key performance indicators (KPIs) and/or narrative. This will give assurance that the objectives within the Barnet Plan are being delivered as planned and highlight any potential areas of concern.
- 1.4 With the successful delivery of the objectives, it is anticipated that certain outcomes will be positively impacted as a result. A number of outcome performance indicators (OPIs) have therefore also been identified, which will show how we expect specific aspects of the lives of Barnet’s residents to be positively affected, from key borough statistics – for example, employment, education, housing, social care – and results of the Residents’ Perception Survey (RPS).
- 1.5 Underpinning our approach to delivery of the Barnet Plan are the 4 key areas of Equalities, Partnership, Prevention and Place-based working. A number of activities have been identified which focus on these areas and these will be highlighted within the Delivery and Outcomes Framework as implementation progresses.
 - 1.5.1 Focus on Equalities: We have published our EDI policy which includes a detailed action plan. Progress against the actions in the plan is tracked and scrutinised by the EDI Steering Group and an Annual Equalities Report is brought to this committee.
 - 1.5.2 Working in partnership: Partnership working is central to how we expect to achieve the best outcomes for Barnet and many of our objectives within the plan will involve working closely with both our formal and informal partners, the details of which are outlined in the appendices, predominantly within the Family Friendly and Healthy themes.
 - 1.5.3 Focus on Prevention: Work is underway to develop a prevention strategy which outlines the principles we will use to tackle problems before they arise. Activities in Year 1 of the Barnet Plan where the prevention principles are being applied include increasing digital inclusion and tackling financial vulnerabilities within the Clean, Safe and Well Run theme.
 - 1.5.4 Place-based working: Recognising the value in tailoring our approach to the unique needs of people in a given location or within a specific community, to deliver effective solutions and / or services is a critical part of our approach to certain objectives within the Barnet Plan. In Year 1, we are beginning to co-ordinate work to support residents

of the Grahame Park estate in developing community-based responses to issues in their area.

- 1.6 The proposed framework will also include budget outturn information at service level, in order to present a comprehensive view of performance on the Barnet Plan, as well as highlight potential risks to delivery of the plan objectives.
- 1.7 Extensive engagement and consultation with workstream leads and services has been carried out over a number of months to clarify the priorities for the 4 years of the plan, specific activities for Year 1 (2021-22) and the most appropriate way of measuring progress on delivery and performance depending on the nature of the service and activity.
- 1.8 The proposed framework is very much a collaborative effort and has been designed to ensure minimal reporting burden to services. It also aims to avoid duplication in working practises.

2. REASONS FOR RECOMMENDATIONS

- 2.1 The new Barnet Plan for 2021-25 was approved in March 2021 and is now being implemented. As a result, a Delivery and Outcomes Framework has been collaboratively designed to monitor progress in delivery and performance, and ensure that residents, partners, Members and others are able to see whether we are achieving the objectives set out in the plan.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 The Council could choose not to adopt an outcomes framework. However, having set out the council's objectives in the Barnet Plan, it is important that councillors and residents are able to see the progress the council has made in delivering those objectives.

4. POST DECISION IMPLEMENTATION

- 4.1 The details for performance indicators including baseline data and targets are being compiled, as well as beginning to establish mechanisms for monitoring new performance indicators identified as part of the Delivery and Outcomes Framework.
- 4.2 A quarterly report on the Delivery and Outcomes Framework will be brought to Policy and Resources Committee on a quarterly basis. The first report will be in December 2021 and will provide an overview of progress and performance for each Theme of the Barnet Plan for the period April to September 2021 (or the latest data available as at the end of September 2021).
- 4.3 This will consist of a progress update on Year 1 activities and performance against target and / or direction of travel against previous performance, as well as narrative and budget outturn information by Theme.
- 4.4 Reporting requirements for the Theme Committees have been discussed with Executive Directors. Performance on relevant objectives from each Theme of the Barnet Plan will

be taken to Theme Committees in line with their responsibilities as follows:

Theme Committee	Reporting	Frequency
Policy & Resources	An overview of all 4 themes of the Barnet Plan, as per the Delivery and Outcomes Framework, as well as budget outturn information	Quarterly
Adults & Safeguarding	An update on the Healthy theme will be included as an appendix to the quarterly Adults' performance report	Quarterly
Children, Education & Safeguarding	None. The agreed quarterly performance update for CES committee will continue	Not applicable
Community Leadership & Libraries	An update on the "Address issues of anti-social behaviour such as frauds, fly-tipping, noise nuisance and illegal parking" and "Tackling domestic abuse and gender based violence" objectives will be provided	6 monthly
Environment	An update on the relevant objectives within the Clean, Safe and Well Run and Thriving themes will be provided	6 monthly
Housing & Growth	An update on the relevant objectives within the Thriving theme will be provided	Quarterly

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

5.1.1 This report provides a strategic overview of the Delivery and Outcomes Framework that has been collaboratively designed to enable residents, partners, Members and others to see whether we are achieving the objectives set out in the Barnet Plan 2021-25.

5.1.2 Robust performance and budget monitoring are essential to ensure that there are adequate and appropriately directed resources to support delivery and achievement of the strategic objectives set out in the Barnet Plan 2021-25.

5.1.3 Delivering the Barnet Plan will involve implementing a number of existing strategies across the council, working collaboratively with our partners and the voluntary sector. These strategies include the Health and Wellbeing Strategy, the Long Term Transport Strategy, the Growth Strategy, the Children's and Young People's Plan and the Life Chances Strategy. A number of other strategies are being developed as part of the Barnet Plan such as the Sustainability Strategy and the refreshed Violence Against Women and Girls Strategy.

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

5.2.1 Budget outturn positions will be included as part of the proposed Delivery and Outcomes Framework and reporting arrangements. More detailed information on financial performance will continue to be reported to Financial Performance and Contracts (FPC) Committee.

5.2.2 The proposed activity reporting builds on existing service priorities and reflects existing service strategies and reporting plans. There will therefore be no direct resource implications arising from this report.

5.3 Legal and Constitutional References

5.3.1 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 to take actions which are calculated to facilitate, or are conducive or incidental to, the discharge of any of their functions.

5.3.2 The council’s Constitution, Article 7 Committees, Forums, Working Groups and Partnerships, sets out the functions of the Policy and Resources Committee:

(1) 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
- Finance including: Treasury management Local taxation; Insurance; Corporate procurement; Grants; Writing-off debt; Virements; Effective use of resources
- Procurement Forward Plan
- Local Plans (except for matters reserved to Full Council)
- Information Technology
- Strategic Partnerships
- Customer Services and Resident Engagement
- Emergency Planning

(2) To be responsible for those matters not specifically allocated to any other committee affecting the affairs of the Council.

(3) Consider for approval budget and business plan of the Barnet Group Ltd.

(4) To determine fees and charges for services which are the responsibility of the committee and to note decisions taken by Theme Committees, the Planning Committee and Licensing Committee on fees and charges within the remit of those committees.

5.4 Insight

5.4.1 In developing the Barnet Plan, insight and intelligence data from the recently created Insight function has been used to identify priorities and support decision making.

5.4.2 The proposed Delivery and Outcomes Framework will bring together data from across the organisation into one place, allowing a comprehensive view of progress and performance against the Barnet Plan themes.

5.4.3 Once established, analysis of the data will include comparison against external benchmarking data to help identify areas of best practise or where further focus might be required.

5.5 Social Value

5.5.1 The Public Services (Social Value) Act 2013 requires people who commission public

services to think about how they can also secure wider social, economic and environmental benefits. Before commencing a procurement process, commissioners should think about whether the services they are going to buy, or the way they are going to buy them, could secure these benefits for their area or stakeholders.

5.6 Risk Management

5.6.1 The council has an established approach to risk management, which is set out in the Risk Management Framework. Risks are reviewed quarterly (as a minimum) and any high level (scoring 15 to 25) risks are reported to Policy and Resources Committee. Risks are currently reported as part of the budget papers. Going forward they will be incorporated in the quarterly reports on the Delivery and Outcomes Framework.

5.7 Equalities and Diversity

5.7.1 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 Cabinet 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:

5.7.2 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.

5.7.3 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:

- a) Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- b) 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;
- c) 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.

5.7.4 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.

5.7.5 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:

- a) Tackle prejudice, and

b) Promote understanding.

5.7.6 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:

- a) Age
- b) Disability
- c) Gender reassignment
- d) Pregnancy and maternity
- e) Race
- f) Religion or belief
- g) Sex
- h) Sexual orientation
- i) Marriage and civil partnership

5.7.7 More detail regarding equalities, diversity and inclusion in delivering the Barnet Plan can be found in paragraph 1.5.1.

5.8 **Corporate Parenting**

5.8.1 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. There are no implications for Corporate Parenting in relation to this report.

5.9 **Consultation and Engagement**

5.9.1 Consultation on the Barnet Plan 2021-25 was carried out in the autumn 2020. The Barnet Plan was approved by Council in March 2021.

6. **BACKGROUND PAPERS**

6.1 Council, 2 March 2021 – approved Corporate plan (The Barnet Plan 2021-25) <https://barnet.moderngov.co.uk/documents/s63856/Appendix%20A%20BARNET%20Corporate%20plan%202021%20-%202025.pdf>

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The Barnet Plan 2021-25: Clean, Safe and Well Run

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

Objective: Improving Customer Service

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Provide excellent customer service and build on previous improvements by re-imagining and reinventing business processes	Review top 5 processes for both council tax and housing benefit to increase automation (details being scoped) and reduce repeat contact Embed continuous improvement plans at a service level that are monitored and aligned to overall objectives: for Year 1, review outbound correspondence for council tax and housing benefit to reduce queries and repeat contact
Influence a change in culture across the council and its partners to ensure a customer focused organisation, continually seeking feedback and co-designing improvements around our residents needs	Launch customer standards and principles to drive service led improvement plans and embed in service so each have their own framework Devise a broader customer service training programme so that all staff understand how to deliver great customer care: a series of courses on Barnet's eLearning Hub (POD) which will be relevant for all staff (those not in contact centre roles) and a course for Members to reduce escalation of Members' enquiries Procure and implement a new complaints management system by end of March 2022 to improve recording and reporting processes to drive business improvements and outcomes from the complaints process.
Provide a more holistic view of our residents, improving data quality and insight	Develop insight into how our residents interact across council services and tools that allow quicker analysis of trends and behaviours: introduce Power BI for contact centre management information to improve analysis and make better service decisions informed by data
Deliver a contact centre platform that handles demand across channels (email, phone, social media) and automates verification, becomes more personalised and predictive	Produce an options appraisal to determine whether the technology needs to change
Ensuring no resident is left behind, where there is an ever-increasing reliance on digital products and services (Digital inclusion)	Create a portal on the LBB website that provides staff and residents with one place to access resources, support and help on offer for digital enablement both at the council and via its partners Review the role of the face-to-face customer service staff at Colindale reception, with the aim of introducing an alternative model which will deliver support across the borough to our most vulnerable residents and possible adoption of the customer advocacy model through CSG

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> • % customers satisfied overall with customer services (excluding web) • % customers satisfied with the council's website • % customer cases closed within agreed timescales 	<ul style="list-style-type: none"> • Residents' Perception Survey (RPS) - % residents who report that it is easy to access council services • RPS - % residents who agree that LBB is a customer focused organisation and works to continually improve the customer experience

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> Use of website - % contacts via web compared to phone 	<ul style="list-style-type: none"> Reduction in the need for customers to chase for updates and make repeated contact regarding the same issue *

* Currently under development with CSG, likely to commence late Year 1 / into Year 2

Objective: Better environmental services and a cleaner borough

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Remodel the Street Cleansing service	Implement the new area-based model for Street Cleansing by June 2021
	Invest in additional resource and staff training to support the implementation of the new Street Cleansing model and tackle issues such as flytipping and targeted cleansing
	Introduce mechanised cleaning to supplement manual cleansing operations across the borough
Modernise our data systems for Streetscene	Complete implementation of the new works management system to provide a robust and efficient system to manage Street Scene activities
	Continue to improve Streetscene systems to provide customers with reactive and proactive notifications on their service requests
	Continue to develop customer access to services and information online
	Develop internal management information dashboards for Streetscene to understand demand and inform service decisions
Support the financial sustainability of the service	Continue to promote take up for the chargeable garden waste collection service, generating income to support the continued delivery and/or enhancement of other services
Maximise recycling and minimise waste	Implement a range of activities to support recycling and waste reduction, as part of the council's Reduction & Recycling Plan such as low plastic zones, trialling recycling for flats and introducing new ways of combatting contamination of recycling
	Work with the North London Waste Authority to support their initiatives on recycling and waste reduction
We will continue to invest in and make improvements to the borough's roads and pavements	Implement the 2021/22 Network Recovery Plan Programme

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> Number of issues (service requests) received reported by type £ income from chargeable waste service Number of flytips reported Number of graffiti incidents reported % Household waste sent for reuse, recycling and composting Annual Programme relating to Carriageway Resurfacing schemes - commencement and completion of schemes in accordance with agreed programme dates Annual Programme relating to Footway Relay schemes - commencement and completion of schemes in accordance with agreed programme dates 	<ul style="list-style-type: none"> RPS - % residents who are satisfied with refuse and recycling services RPS - % residents who are satisfied with street cleansing service RPS - % residents who are satisfied with repair of roads RPS - % residents who are satisfied with quality of pavements

Objective: Address issues of anti-social behaviour such as frauds, fly-tipping, noise nuisance and illegal parking

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Create a specialist Investigation and enforcement capability for the council to identify and resolve all instances of anti-social behaviour, including but not limited to all frauds, fly-tipping, littering noise nuisance, Blue Badge misuse, Licensing, Highways, Trading Standards, and Environmental Health offences.	Review schemes of delegation and legislation to identify commonalities, process improvements and how we can maximise opportunities for joint working
	Review IT arrangements with the aim of adopting a common system to record incidents of non-compliance across teams
	Increase staffing resources available for specialist Investigation and enforcement work
	Strategic review of CCTV to upgrade software and hardware and ensure cameras are located appropriately

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> A narrative update will be provided outlining progress against the project milestones Metrics are being developed and the number of incidents, as well as enforcement activity as a result, will be captured but this will be a KPI from Year 2 due to the need to first collate reporting via the new IT arrangements 	<ul style="list-style-type: none"> RPS - % residents who are concerned about anti-social behaviour RPS - % residents who are concerned about noise / graffiti etc

Objective: Robust Financial Management

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Maintain robust financial management and, at a minimum, maintain the amount of income generated to support service expenditure, with value for money at the heart of everything we do	Ensure robust financial management processes are in place, to include setting a balanced revenue budget each year, setting an appropriate capital budget each year (which allows us to live within our means, led by how much we can afford to repay), setting a Medium Term Financial Strategy to guide financial decision making and effective collection of local taxation and recovery of outstanding sundry debt in under 90 days
	Develop and implement policies for Responsible Procurement and Social Value
	Review an approach for maximising and realising benefits from investments in strategic property acquisitions
	Improvement in Treasury performance (Interest paid and earned minimised/maximised) to provide value for money to the taxpayer.
	Carry out an external review of Capital Budget to provide assurance that spending is in line with Capital Strategy and is sustainable
	Financial vulnerability: develop a financial vulnerability dashboard with multiple service vulnerability datasets overlaid to match datasets across key revenue and benefits, Adult Social Care and wider service areas to develop "single view" of individuals and their engagement with the council. Explore resulting insights to design a multi-service approach to provide appropriate support to identified residents.

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Ensure the highest standards of corporate governance and compliance	Carry out a review of internal controls, to include compliance with delegated powers, financial regulations and contract procedures to ensure these all reflect best practise and align to LBB constitution. Clearly communicate roles and responsibilities for compliance, governance and assurance
	Clarify roles and responsibilities for maintaining a strong control environment while delivering a robust internal audit function including planned risk-based audits
	Undertake a light touch check-in to ensure the updated special projects framework, for commissioning Capita works outside of the core contracts with CSG and RE, is working effectively
	Undertake a comprehensive review of strategic and service risks to ensure risks reflect the challenges of the last 18 months; are focused on the delivery of our objectives; and emerging risks are identified

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> Revenue budget outturn is within target % of the budget Budget savings are delivered on time or substituted appropriately % Council Tax collected % Business Rates collected % sundry debt collected (within 90 days) % audit recommendations completed to agreed timescale (all audits not just finance) 	<ul style="list-style-type: none"> RPS - % residents who agree that LBB provides good value for money RPS - % residents who are satisfied with the way LBB runs things

Objective: Unlocking the Potential of Parks and Open Spaces

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
An Active Borough – support increased physical activity and improved health	Progress with design development of West Hendon Playing Fields to planning stage, secure Community Infrastructure Levy funding to deliver programme
	Commencement and delivery of circa £1m investment project at Colindale Park
	Complete investment project at Childs Hill Park as part of S106 contributions
	Achieve planning consent for delivery of Rushgrove Park, subject to award commence with procurement of construction partner
	Complete tennis management pilot at Victoria Recreation Ground, Hendon Park, Montrose Playing Fields and Edgewarbury Park, providing recommendations on the future options
	Progress with design development of Heybourne Park to planning stage
	Progress with design development of Copthall and Mill Hill Open Spaces masterplans
A Green and Connected Borough	Plant circa 700 trees as part of the Tree Planting Programme
	Identify a location for a 'Tiny Forest' within the borough and deliver project
A Prosperous Borough – 21st Century Parks	In line with the 'Keep Britain Tidy' campaign, co-ordinate litter clearance efforts working with stakeholders (such as the Environment Agency / Canals & River Trust) at strategic locations

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
	Support the development of a vision and action plan for the 'Welsh Harp' working in partnership with the Canals & Rivers Trust, Environment Agency and LB Brent.
	In partnership with commissioned partner, co-ordinate an Events programme to be delivered within identified park locations
	Commence pilot of park patrol service, in consultation with Streetscene and Enforcement services
	In line with Environment Committee recommendations, install car park charging infrastructure at Mill Hill Park, Old Courthouse Recreation Ground, West Hendon Playing Fields and Scratchwood Open Space

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> • Number of trees planted • Total number of Park events delivered • A narrative update will be provided outlining progress against the implementation of the Parks and Green Spaces improvement plan, as well as the ParkGuard pilot 	<ul style="list-style-type: none"> • Total amount of investment secured to support park improvements • RPS - % residents satisfied with parks and open spaces

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The Barnet Plan 2021-25: Family Friendly

Creating a Family Friendly Barnet, enabling opportunities for our children and young people to achieve their best

Objective: Family and Belonging

Families and children can be together and be part of a community that encourages resilience

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Provide support that encourages and builds resilience Improve social, emotional and physical health and well being	Deliver the Autism Action Plan, developing clear pathways across health, education and social care and establishing a continuum of support for children with autism needs from diagnosis, through Early Help and to specialist teams.
	Develop a multi-agency integrated support hub that will provide respite, parenting support, health advice and therapies.
	Develop a Feedback, Engagement and Participation Strategy to ensure that engagement with children, young people and their families is purposeful and impactful so that we demonstrate how we listen, change and develop in response to their feedback.
	Commission independent surveys of young people through Coram’s Bright Spots survey (Children in Care and Care Leavers) and the Youth Perception Survey.
Sufficient good quality family housing	Work with Barnet Homes to progress identification of suitable and appropriate housing options, review protocol with Barnet Homes and determine acquisition needs for additional homes, in order to meet the increasing need.
Great corporate parenting	Deliver the Corporate Parenting Strategy, supporting children and young people to be resilient, aspirational and independent.
	Deliver the Placements Strategy, remodelling placements to reduce number of children in high-cost placements. Increase the recruitment and retention of internal foster carers and supported lodgings hosts.
	Develop in-house therapeutic provision to expanding lower cost internal semi-independent options.

Objective: Safe and Secure

Children and young people are safe and protected from harm

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Ensure the most vulnerable are protected Help children to live in safe and supportive families and communities	Develop a Parenting Hub to provide early years parenting interventions targeted at families with multiple needs, parents with personality disorders, or disrupted attachment. Parenting assessments will be undertaken and enhanced support offered to families in Early Help.
Prevent young people from being drawn into violence, crime, exploitation and antisocial behaviour Strengthen engagement with professionals	Deliver the Youth Justice Plan 2021 - 2023 with priorities to reduce offending and re-offending, tackle disproportionality, enhance prevention and diversion, protect the public, reduce Serious Youth Violence and keep young people’s voices at the centre. Following consultation, finalise the 2021 - 2023 Violence Against Women and Girls Strategy, to include the duties set out in the

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Listen to and act on the Voice of the Child	<p>Domestic Abuse Act 2021. Recommission the Domestic Abuse provision in line with the strategy.</p> <p>Deliver the Barnet Safeguarding Children’s Partnership Business Plan, working with partners to continuously improve safeguarding practice and respond to local issues.</p> <p>Deliver the Vulnerable Adolescents Strategy in order to safeguard children and young people in Barnet from the significant harm caused by sexual and criminal exploitation, gangs and serious youth violence. Priorities are the creation of opportunities, identification and early response to need, the enrichment of our workforce to equip them with the skills to effectively intervene and an unrelenting focus on disruption activities.</p> <p>In line with the Public Law Outline review, provide additional support to address families’ recognised needs and prevent the need to issue care proceedings.</p>

Objective: Education and Learning

Children and young people can learn about the world around them

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Ensure there are sufficient high-quality school places	Deliver the School Places Strategy to ensure there continue to be sufficient good quality school places. Rebuild the Pavilion Pupil Referral Unit.
Ensure the provision of high-quality local specialist and mainstream placements and support for children and young people with special educational needs and disabilities	Deliver the Special Educational Needs and Disabilities (SEND) strategy to ensure that all children with SEND receive high quality, integrated and inclusive services through effective and timely decision making across partner agencies and through listening and responding to the voices of children and young people, parents, families and professionals.
Improve the educational progress and outcomes for all children and young people Attainment and Inclusion - diminishing the difference and building resilience	Deliver the Education Strategy to ensure high quality education services, excellent, resilient schools, high levels of achievement and protecting and supporting vulnerable and disadvantaged children and young people and maximising their life chances and the resilience of them and their families.
Minimise the negative impact of the pandemic on learning	Deliver the Recovery, Reset and Renaissance project to address the impact of Covid on pupils’ learning by providing specific support, advice and training to schools through BELS and external specialists, and allocating funds to school based projects designed by schools themselves and sharing the learning from these projects across all schools in order to accelerate progress and recovery. Ensure there is sufficiency of childcare places, monitoring the impact of Covid on early years places.

Objective: Health and Wellbeing

Children are supported to achieve a healthy start in life, enjoy a healthy lifestyle and to build resilience

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
<p>Give every child in Barnet the best possible start to a healthy life</p> <p>Support children and young people to adopt healthy lifestyles to prevent avoidable illness and improve their social, physical and mental wellbeing</p> <p>Enable children and young people to build emotional resilience</p>	<p>Work with the North Central London Clinical Commissioning Group (NCL CCG) as the lead commissioner, to secure a new provider for the Children’s Integrated Therapy Service.</p> <p>Address issues of capacity, recruitment and retention of staff to prioritise and increase the therapy support available to children and families, and schools.</p> <p>Roll out Mental Health Support Teams across all schools.</p> <p>Develop the Parenting Hub to provide targeted early years parenting interventions.</p>

Objective: Life Chances

Children and young people are able to succeed

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
<p>Develop resilience and improving education</p> <p>Deliver access to equal opportunities</p> <p>Strengthen families and early years</p> <p>Target support</p>	<p>Deliver the Life Chances Strategy.</p> <p>Deliver Post-16 Education and Skills Strategy to extend the opportunities available to young people, particularly those from disadvantaged groups, and keep the number of young people who are not in employment, education or training (NEET) to a minimum.</p> <p>Support delivery of the Work, Productivity and Skills Action Plan, with a focus on the priority of supporting younger people on a pathway to high quality employment.</p>

How we will measure success / progress*
Link to the quarterly Children, Education and Safeguarding Committee performance report
Link to the annual Education Standards report
Link to the Youth Perception Survey report / highlights if appropriate, available every 2 years
Update on Family Friendly as per progress update Children's Partnership Board – frequency to be confirmed

* There will be a quarterly update to CMT so we will include whichever of these are available for that quarter

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The Barnet Plan 2021-25: Healthy

We aim to be the healthiest borough in London with fantastic facilities for all ages, enabling people to live happy & healthy lives

Objective: Bring health and care together

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Develop the Barnet Place Based Integrated Care Partnership (ICP) with Barnet NHS Partner organisations and the North London integrated care system.	Work with health and Voluntary, Community and Faith sector partners to develop the Barnet Integrated Care Partnership (ICP). This will include extending the range of projects and initiatives, implementing new programmes of work and developing governance in preparation for implementation of a statutory integrated care system.
Continuing to develop neighbourhood models of health and care support aligned with primary care networks focusing on specific cohorts and conditions	Working with primary care networks, implement a model of community based multidisciplinary support for people with dementia, frail older people and their carers. Additionally, expand the model to achieve borough-wide coverage subject to the outcomes of the pilot. Develop neighbourhood based multi-agency working to address the wider determinants of health
Integrated hospital discharge	Further develop the Integrated Discharge team model to ensure residents leaving hospital get the right care and support, in the right place and in a timely fashion. This will include embedding and mainstreaming the service model into 'business as usual', confirming funding and delivery levels for all partners and ensuring compliance with expected new legislation which will make the model a statutory requirement.
	Complete the transition back from central government funding of the initial period of post-hospital care without adding significant delay into the system. Ensure all residents who need one get a full Care Act assessment and a financial assessment.
Tackling health inequalities related to Covid19	Develop a health improvement and prevention approach to address health inequalities in communities
Integrated support for care homes	Embed new models of quality and clinical in-reach support to care providers and sustain the services over the longer term.

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> Number of clients with joint funding (Continuing Health Care) arrangements Total number of hospital discharges in the year (pathway 0,1,2 or 3) 	Specific outcome performance indicators are under development. A narrative update on the activities listed above will be provided in the first instance.

Objective: Support residents to maintain their strengths and independence

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
<p>Working across council services and with partners to implement plans and schemes that improve the lives of Barnet's most vulnerable residents and promote independence. Focus on supporting independent living using a strengths-based practice model.</p>	<p>Continue to develop our two new extra care schemes, Atholl House in Burnt Oak, due for completion in Spring 2022, and Cheshir House in Hendon, due for completion in Summer 2023.</p>
	<p>Work with our partners and commissioned services to ensure services adapt and are able to most effectively support residents with a learning disability or mental ill-health to enter or stay in the paid workforce.</p>
	<p>Working with Family Services, develop new ways to expand choice of care and support and promote independence for young adults with learning and complex disabilities.</p>
	<p>Explore opportunities to increase the number of people that can benefit from the work of our prevention and wellbeing team, delaying or avoiding the need for adult social care.</p>
	<p>Continue to deliver the priorities agreed in the Autism Action Plan, including working on the diagnostic pathway, awareness training and peer support for people with autism in our community, employment and skills.</p>
	<p>Complete work on our Dementia strategy, which will set out our commissioning intentions and priorities to improve outcomes for people with dementia and their carers.</p>
	<p>Undertake a strategic review of respite support for older people, including people living with dementia and people with learning disabilities.</p>

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> • Permanent admissions to residential and nursing care homes, per 100,000 population age 65+ • Permanent admissions to residential and nursing care homes, per 100,000 population age 18-64 • % of contacts signposted or provided with information, advice and guidance • % of safeguarding outcomes achieved (against number of people raising a concern or enquiry through safeguarding) 	<ul style="list-style-type: none"> • Increase in adults with learning disabilities who live in their own home or with their family • Maintain or increase people who feel in control of their own lives • Maintain or reduce permanent admissions to residential and nursing care homes, per 100,000 population age 65+ • Maintain or reduce permanent admissions to residential and nursing care homes, per 100,000 population age 18-64

Objective: Residents lead active, healthy lifestyles

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Continue to promote opportunities to maintain a healthy lifestyle	Develop an updated Fit and Active Barnet (FAB) strategy that builds on our previous success to deliver positive outcomes for residents; implement our FAB campaign by developing and delivering behavioural change campaigns, working with partners and connecting to national campaigns such as 'This Girl Can' and 'We are Undefeatable'.
	Increase physical activity levels in the borough through targeted work with groups who are less active and opportunities for physical activity that increase wellbeing and sustainability.
	Continue to invest in our leisure centres, enhancing facilities and developing longer term plans.
Continue to promote opportunities for healthier eating	Create more opportunities for healthier eating via the launch of the Healthier High Streets programme to encourage local hospitality businesses to become partners in Healthier Catering, London Refill (reusable water stations) and Breastfeeding Welcome.
	Deliver a healthy eating campaign focusing on food budgeting, reading labels, smart shopping and healthier cooking; working with local partners and connecting to national campaigns such as Change for Life.
	Increase the number of residents supported to eat well through weight management services. We will work with NHS partners to deliver the new digital weight management service and our local specialist weight management dietetics service. These will be delivered alongside the existing National Diabetes Prevention Programme and the Better Leisure Weight Management Programme.

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> A narrative update will be provided outlining delivery of FAB opportunities including engagement with specific groups and a breakdown of activities, including active travel, as well as delivery of the healthy eating initiatives 	<ul style="list-style-type: none"> Increase in adults who are active for at least 150 mins per week Increase in residents who feel they have a greater access to healthy food and more opportunities for physical activity – to be measured via Residents' Perception Survey

Objective: Residents maintain their mental health

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
<p>Residents have access to health and wellbeing information and activities and support available is promoted*</p> <p>* The council's mental health social work teams and recovery service, the Network, are integrated with NHS mental health services and work closely with the voluntary sector.</p>	<p>Working in partnership with key prevention voluntary community sector providers such as Community Barnet, Mind, Meridien Wellbeing service to increase knowledge of support and raise awareness including online advice</p>
	<p>Develop a multi agency suicide prevention strategy with particular focus on groups such as older men, and implement the strategy's actions for Year 1</p>
	<p>Promote and support wellbeing events to raise awareness such as Mental Health Awareness Week and Suicide Prevention Month</p>
	<p>Work closely with Barnet, Enfield and Haringey Mental Health Trust to ensure that their transformation programme for community mental health services most effectively meets the needs of Barnet residents.</p>
	<p>Work with North Central London Clinical Commissioning Group and partners to improve the multi-agency model of care and support for people with severe mental illness. This will include: an enhanced community-based offer, including physical health, employment support, personalised care, medicines management, a preventative approach with a focus on reducing health inequalities, and support for self-harm and substance misuse; services for mental health aligned with primary care networks; and improved crisis support.</p>

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> • Number of people accessing the Network • Outcomes of people accessing the Network, by type 	<ul style="list-style-type: none"> • Increase in residents with Severe Mental Impairment who are employed or able to access employment opportunities

Objective: Tackling domestic abuse and gender based violence

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
<p>We will invest in providing early help, intervening earlier to ensure people are prevented from becoming victims of domestic abuse, and are protected when it does occur. We will work with partners to create improved access to mental health support for anyone impacted by domestic abuse.</p> <p>We will develop outreach to older people, LGBTQ+ residents and refugee communities. We will continue to work in partnership on this issue – including communications, awareness and training for frontline staff</p>	<p>Specific activities will be included in the Violence Against Women and Girls (VAWG) strategy which will go to The Barnet's Safer Community Partnership Board for approval in January 2022</p>

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> Number of domestic abuse cases reported Number of service users reported to our support services Number of service users supported through our support services 	These will be confirmed in line with the drafting of the VAWG strategy and outcomes of the consultation
NB. Further performance indicators may be included as the VAWG strategy is developed	

Objective: Address the longer-term impacts of COVID-19 on communities

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
<p>Ensuring that there is a wide range of support available for residents to help them with employment, training, homelessness & housing, debt, income maximisation and food. We will promote these services widely, ensuring that affected residents know how to access the support available and that services are easy to access. Our services will provide support and help early on, preventing things escalating, ensuring that our services mean residents are clear on their rights as consumers and are able and supported to maximise their income. Ensuring that we continue to tackle food insecurity and enable digital inclusion for residents.</p>	Develop an insight led dashboard to identify areas which have been most impacted by the Covid-19 pandemic, to track the longer term impacts of the pandemic and the effectiveness of interventions
	Develop an overview strategy that brings together the various delivery plans which sit in other areas of the Barnet Plan, such as unemployment, homelessness and financial vulnerability
	Engage and work in partnership with key stakeholders (such as Adults Voluntary and Community Sector liaison group, LBB Partnership Board members and Adults Voluntary, Community and Faith Sectors forum) to inform the development of the strategy and associated delivery plans

Key Performance Indicators	Outcome Performance Indicators
Addressing the longer-term impacts of COVID-19 is a cross-cutting objective for the Barnet Plan; as such the developed strategy and insight approach provides the framework for monitoring the longer term impacts of the pandemic and the effectiveness of interventions implemented as a result. Specific performance indicators are already being reported elsewhere in the Outcomes Framework and these will be referenced within the developed overview strategy.	

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Reduce the use of temporary accommodation	Review our Homelessness Strategy, with a focus on prevention. This will include the completion of a health needs assessment for rough sleepers, an initial scoping exercise to review the effectiveness of homeless prevention partnership working across the borough, the impact on the customer and how a local forum / partnership can best deliver the refreshed aims of the Homelessness and Rough Sleeping Strategy 2019-2024
Focus on prevention of homelessness	
Maintain effective multi-agency and voluntary sector partnerships, including strengthening links between housing and health	
Support rough sleepers to address their housing and other needs	

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> • Number of preventions achieved each year • Number of households in temporary accommodation – including breakdown of families with under 18s, care leavers 	<ul style="list-style-type: none"> • Reduction in homelessness • Reduction in the cost of households in temporary accommodation

The Barnet Plan 2021-25: Thriving

Building a Barnet fit for the future, where all residents, businesses and visitors benefit from improved Housing, infrastructure & economic opportunity

Objective: Help residents - especially young people - into work

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Help residents - especially young people - into work	Collaborate with Barnet Education and Learning Service (BELS), local partner organisations, youth service providers etc to support young people into employment, utilising internships, apprenticeships and other opportunities, and targeting support for groups such as care leavers, young offenders and those with disabilities
	Launch a new "one-stop shop" to help those who have never been unemployed before to navigate the system so they can find the opportunities and support they need
	Bring forward the review of the Local Plan Supplementary Planning Document 'Delivering Skills, Employment and Training Through S106' to ensure it is maximising the resources available now for investment in training for those who need it most
	Work with the West London Alliance (WLA) to secure further funding from the Department of Work and Pensions (DWP) to deliver large scale employment and skills programmes
Focus on creating new pathways into work that focus on the highest-growth sectors with the best long-term prospects for progression: health & care, construction and trades, and the creative industries	Work with our partners to develop new approaches to employment schemes for high-growth sectors focusing on health and care, construction trades and creative industries, which will together generate thousands of new jobs in the coming decade
	Working with Planning, encourage regeneration developers to actively create new local job opportunities alongside upskilling their existing workforce
	Work with anchor organisations such as Middlesex University and Barnet & Southgate College to support training in high growth sectors
	Develop more joined up partnerships between training providers and businesses so that residents are able to develop the skills employers need in growing sectors
Work with those furthest from the labour market: Work across our partnership to reduce barriers to work and learning opportunities so that residents from all backgrounds can access good work	Ensure that essential training opportunities and support is available to those who need it through activities such as maintenance of the Jobs Portal on the council website, continuation of the Barnet Employability Network and active promotion through BOOST (Barnet Employment and Financial support) and BELS
	Work closely with DWP and Job Centre Plus to continue the successful rollout of the Work & Health programme to help at least 300 residents into work this year
	Work with DWP and the West London Alliance (WLA) to ensure Barnet residents are able to fully access the Job Entry Targeted Support (JETS) programme
	Support at least 300 residents into good work through our BOOST programme
	Expand our existing provision of digital skills to help break down the biggest barriers to employment, through working in partnership with BOOST and digital inclusion programme

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
	Review and monitor the current provision for adults and young people with learning disabilities and implement recommendations once identified
	Expand the availability of ESOL (English for Speakers of Other Languages) provision to offer additional support to those who traditionally do not engage with other services
	Establish at least two local hubs in the heart of the Grahame Park, West Hendon and Dollis Valley communities where the need for work is highest, in order to set up co-location of support services such as employment, financial and benefits advice

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> All adults - % participating in employment support programmes converting into employment 16-24 year olds - % participating in support programmes converting into education or training 	<ul style="list-style-type: none"> Increase in % Barnet residents employed % NEETs - aim to reduce Increase in % residents with a learning disability who are currently in paid employment

Objective: Implement our growth strategy

Full details of the delivery plan for 2021-22 are available in the annual Growth Strategy update

<https://barnet.moderngov.co.uk/documents/s65202/Appendix%201%20Growth%20Strategy%20annual%20update.pdf>

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
A Growing Borough: <ul style="list-style-type: none"> Increase the supply of housing Deliver more homes that people can afford Support our growing older population Deliver homes on public sector land 	Deliver our existing regeneration programme and explore new growth opportunities to increase the supply of housing
	Deliver more homes that people can afford on council land and through our planning system
	Deliver new specialist housing, such as Extra Care schemes in Hendon and Burnt Oak that will enable our growing older population to live as independently as possible
	Work with our public sector partners such as the NHS, Transport for London and Greater London Authority to deliver homes on public sector land
A Connected Borough: <ul style="list-style-type: none"> Enable new and enhanced public transport connections Investigate proposals for improvements associated with the Long Term Transport Strategy Deliver healthier street design to support all forms of travel Implement state of the art digital infrastructure 	Work with partners to enable new and enhanced public transport connections, including Brent Cross West station and other improvements to orbital connectivity (across the borough as opposed to North to South) and interchange between rail lines, reduce congestion on roads and rail and improve accessibility
	Investigate improvements to signage and wayfinding, the footway network, cycle parking and cycle network
	Commence work with partners on active corridor improvements at Edgware-Mill Hill-Finchley Central
	Work with broadband service providers to accelerate investment in and rollout of high speed digital infrastructure across the borough, ensuring every home and business has access to high speed internet by 2025
	Deliver a programme of digital inclusion interventions aimed at ensuring all residents have access to the technology to be able to succeed in the future, such as making connections with community

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
	centres, working with BOOST to improve digital skills, and working with providers to make affordable broadband more accessible to those on low incomes
<p>An Entrepreneurial Borough:</p> <ul style="list-style-type: none"> • Deliver first class customer service to the borough's businesses • Identify and support growing business sectors across the borough • Maximise employment opportunities through growth • Support the local economy including promotion of local supply chains 	<p>Convene regular business events to directly engage with and understand the needs of Barnet-based businesses</p> <p>Identify and engage with strategically important sectors, and those of potential greater future importance in Barnet's local economy, to assess ways that the council can support them to maintain and grow their contribution to the borough. Initial sectors of focus include Health and Social Care, Recreation and Leisure, Construction and Creative Industries</p> <p>Facilitate and create job and skills development opportunities in growth sectors</p> <p>Enhance delivery of local supply chain commitments through potential policy changes, new regeneration scheme contracts, and council-wide social value contractual commitments, including developing a new supply chain initiative to better promote the opportunities for, and benefits to, local businesses in relation to the regeneration of Brent Cross Cricklewood</p>
<p>A Borough of Thriving Town Centres:</p> <ul style="list-style-type: none"> • Strengthen and diversity town centres to ensure they are fit for the future • Support joined-up service delivery across the council for healthier high streets • Deliver high quality workspace • Build on existing strengths to create a thriving evening economy 	<p>Plan and deliver town centre public space and public realm improvement projects such as shop front improvements and 1-2-1 business support in Burnt Oak and improvements to West Hendon Broadway</p> <p>Deliver projects and improvements identified within adopted Town Centre Strategies and Community Plans such as developing the business case for priority projects in the Golders Green Town Centre Strategy and working with the community and businesses to deliver priority projects identified within the Chipping Barnet Community Plan</p> <p>Work with partners to launch a programme to address the impact of empty shops on the borough's high streets, and scope a programme to repurpose vacant retail units in town centres through meanwhile uses such as pop-up shops, arts and community</p> <p>Deliver new, specialist SME (small and medium-sized enterprise), creative and light industrial workspace aimed at key sectors through investment in council assets and by influencing private development</p> <p>Support preparation of the Regulation 19 stage Local Plan and the Visitor Economy Plan by using best practice to identify locations and activities that best support new 'evening economy zones', to enable joined-up regulatory support for cafes, bars, festivals and activities, ensuring Barnet's town centres remain safe and antisocial behaviour is minimised</p> <p>Deliver a significant 'Welcome Back' programme of events to activate town centres, promoting their safe return</p>
<p>A Great Borough to Live in and Visit:</p> <ul style="list-style-type: none"> • Delivering social infrastructure • Get the best out of the borough's green assets • Grow the visitor economy 	<p>Deliver Grahame Park and West Hendon community centres and digital support hubs at Brent Cross Cricklewood, Grahame Park and West Hendon, explore the potential of a new programme of leisure services investment, and support the delivery of infrastructure facilities to facilitate regeneration and growth as set out within the Infrastructure Delivery Plan</p> <p>Deliver the planned programme of development to improve the quality of parks and open spaces, such as the capital investment project for Colindale Park, the Copthall and Mill Hill Open Spaces</p>

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
<ul style="list-style-type: none"> Provide a broader canvas for creative industries 	Masterplan, a Borough wide review of parks infrastructure (for example bins, benches) and a diverse events programme.
	Work with development partners to deliver and launch the Brent Cross Visitor Pavilion and commence work to prepare the 'Visitor Economy Plan' (incorporating update and replacement of the Arts and Culture Strategy) by undertaking a visitor asset mapping exercise
	Engage more closely with creative sectors and provide support for new local leisure and cultural destinations, and conduct a cultural audit, mapping the borough's existing creative industries assets and identifying gaps in access.

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> Number of new homes completed - private Number of new homes completed - affordable % ultrafast broadband rollout coverage Number of "Welcome Back" events delivered 	<ul style="list-style-type: none"> Residents' Perception Survey (RPS) - % of residents who are satisfied with the local area as a place to live Reduce levels of homelessness in the borough % of homes and businesses in the borough who have access to high speed internet
<u>Post Year 1 (under development)</u> <ul style="list-style-type: none"> Value of contracts between contractors and local supply chains 	<u>Post Year 1 (under development)</u> <ul style="list-style-type: none"> Increase in social value contribution (once policy developed and implemented) % of local authority spend which is local (include partners / strategic contracts)

Objective: Build a park town for Barnet at Brent Cross Town

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Develop a park town at Brent Cross Town	Deliver the planned programme of building works - homes and infrastructure
	Replace Claremont Primary School and Whitefield and Mapledown Schools with new schools
Create the place in London to participate in sport and play	Deliver the programme of greenspaces development at Claremont Park
Strengthen connections with great transport into and out of central London.	Develop and launch Brent Cross West station by (date TBC)
	Deliver highways improvement and infrastructure works to enable and support the new town
Make a North London town where all can flourish	Deliver programme of work to attract businesses to use newly created office space, create jobs, including targets for people employed (focus on priority groups, local residents), offer opportunities in the project to local businesses and that targets are embedded into each major contract. Develop the "TransformingBX" website for opportunities
Build a net zero carbon town	Plan currently being drafted by Argent - details TBC

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> A narrative update will be provided outlining delivery of programmes of preparation / infrastructure on time and to budget Number of jobs created including focus on priority groups 	<ul style="list-style-type: none"> New jobs created including focus on priority groups New schools
	<u>Post Year 1 (under development)</u> <ul style="list-style-type: none"> Replacement and new homes constructed - confirm % mix of affordable, rental and private Increased scores for residents on the Flourishing Index

	<ul style="list-style-type: none"> • Increase in social value outcomes
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Objective: Create an efficient, convenient and reliable transport network

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Investigate and deliver proposals within the Long Term Transport Strategy	Investigate the proposals noted in the Long Term Transport Strategy - this includes working with Transport for London (TfL) to undertake feasibility studies to improve orbital travel, active travel infrastructure etc.
	Refresh the parking policy in alignment with the Transport Strategy proposals, and in view of emerging alternative transport modes
	Continue to introduce electric car charging provision - actively bid for funding; installation of Electric Vehicle charge points will be dependent on this

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> • Number of LBB electric vehicle charging points • A narrative update will be provided outlining progress on the refreshed Parking policy Performance indicators supplied by TfL and / or the Driver and Vehicle Licensing Agency (DVLA) are also being investigated to supplement the above indicator. It is proving challenging to get data at borough level.	<ul style="list-style-type: none"> • RPS - reduction in traffic congestion as a concern • RPS - reduction in poor public transport as a concern

Objective: Make Barnet a sustainable borough

What are we going to do over the 4 years of the Plan (2021-25)	Year 1 Activities (2021-22)
Produce a Sustainability Strategy for Barnet which will provide an overarching vision and objectives for the borough and bring together existing strategies, policies and plans that support sustainability as well as additional actions which should be undertaken to support the council, residents and business to reduce emissions.	Develop a cross cutting Sustainability Strategy for Barnet to incorporate the air quality plan and other initiatives such as tree planting. Year 1 will focus on designing the strategy, consultation and taking it to committee for approval
	Rollout of energy saving equipment: install energy saving equipment under the Public Sector Decarbonisation Scheme (PSDS1).

Key Performance Indicators	Outcome Performance Indicators
<ul style="list-style-type: none"> • Air quality levels for Particle Matter 10 (PM10) and Nitrogen Dioxide (NO2) • A narrative update will be provided outlining progress on the Sustainability strategy and the rollout of energy saving measures to Council Corporate Estate on time and to budget 	<u>Post Year 1 (being developed)</u> <ul style="list-style-type: none"> • Reduction in greenhouse gas emissions / carbon
NB. Further performance indicators will be identified and included as the Sustainability Strategy is developed	

Policy and Resources Committee

September 30th 2021



Title	Barnet's Local Plan – Submission - Town and Country Planning (Local Planning) (England) Regulations (Reg 22) and Barnet's Local Development Scheme.
Report of	Chairman of the Policy and Resources Committee
Wards	All
Status	Public
Urgent	Yes
Key	Yes
Enclosures	Appendix A - Barnet's Draft Local Plan Appendix B - Barnet's Local Plan – Schedule of Representations on Publication Regulation 19 Town and Country Planning (Local Planning) (England) Regulations 2012 (Reg 19) Appendix C – Barnet's Local Development Scheme.
Officer Contact Details	Nick Lynch - Planning Policy Manager (0208 359 4211) Nick.lynch@barnet.gov.uk Neeru Kareer – Assistant Service Director Planning and Building Control (0208 359 7477) Neeru.kareer@barnet.gov.uk

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. This importance is reflected in the Government's deadline of December 2023 for all authorities to have up-to-

date Local Plans in place.

The Draft Local Plan has now undergone public consultation and is ready to be submitted for Examination in Public (EIP) by an Inspector appointed by the Secretary of State. The Council must produce a local plan which is 'sound'. To be found sound the Local Plan has to be positively prepared, justified, effective and consistent with national policy. Following approval, by Committee and the Council, officers will submit representations to the (Reg 19) Draft Local Plan together with the Local Plan and supporting evidence to the Secretary of State for EIP. As part of the EIP process it is anticipated that modifications to the Local Plan will be proposed by the Council and other stakeholders. Subject to agreement by the Inspector these modifications will undergo further public consultation, the response to which is taken account of in the EIP Inspector's Report. The EIP is expected to take place in 2022 and, subject to the Inspector's Report of that examination adoption of the new Local Plan is not expected until early 2023.

The Local Plan must be prepared in accordance with the Local Development Scheme (LDS) which sets out the programme for the Local Plan and supporting documents as well as the Community Infrastructure Levy Charging Schedule. An up-to-date LDS should accompany submission of the Local Plan.

Officers Recommendations

That the Policy and Resources Committee:

- 1. Note the responses to consultation on the Local Plan – Publication - Regulation 19 (as set out in Appendix B);**
- 2. Agree to refer the Draft Local Plan (at Appendix A) to the Council meeting of October 19th 2021 with the recommendation that the Plan (and its supporting documents) be submitted to the Secretary of State for independent examination in public;**
- 3. Delegate authority to the Deputy Chief Executive in consultation with the Chairman of the Policy and Resources Committee to make modifications to the Draft Local Plan as part of the Examination in Public and prior to public consultation and publication of the Inspector's Report; and**
- 4. Approve the Local Development Scheme (as set out in Appendix C) as the new programme for production of the Local Plan, supporting documents and the Community Infrastructure Levy Charging Schedule.**

1. WHY THIS REPORT IS NEEDED

- 1.1 The Policy and Resources Committee on June 16th 2021 approved the Draft Local Plan (Reg 19) for public consultation and as the document that will be submitted to the Planning Inspectorate for Examination in Public (EIP). The document at Appendix A is the

version of the Local Plan that the Council seeks to adopt, subject to that examination, as the framework for planning decision making from 2021 until 2036.

- 1.2 Following completion of the Reg 19 public consultation and assessment of the representations received the draft Local Plan is now ready for submission to the Secretary of State (SoS).
- 1.3 When submitting the Local Plan the Council must send to the SoS: the draft Local Plan and supporting evidence base documents; all documents sent electronically and appropriately referenced; all responses to the Reg 19 Local Plan in full together with a schedule of representations received; and a statement of the main issues raised in the representations made. The updated LDS will be amongst the documents to be submitted.
- 1.4 In their assessment of the Local Plan the Inspector will raise a series of Matters & Issues & Questions (MIQs) for the Council and respondents to the Reg 19 consultation to consider. Largely based on the responses on the MIQs the Inspector will set a date for the hearing sessions of the Examination in Public (EIP). The hearing sessions will be inquisitorial with the Inspector asking further questions of the Council and Reg 19 respondents who have asked to appear at the EIP. The arrangements for the EIP hearing sessions will be determined by the Planning Inspectorate acting on behalf of the SoS. These inquisitorial sessions are not expected to happen until Summer 2022.
- 1.5 As the EIP progresses a series of main and minor modifications will be required. The minor modifications will mostly cover corrections and improvements to phrasing while the main modifications will be needed to make the Local Plan sound and legally compliant. These EIP modifications will be established through: clarifications, refinements and corrections identified by the Council; accepting changes made in response to representations at the Reg 19 stage; agreeing changes with key stakeholders such as the GLA, statutory bodies and neighbouring authorities through Statements of Common Ground; and making changes as suggested by the Inspector. All main modifications will be subject to approval by the Inspector before they are published for public consultation. The Inspector will consider the responses to the main modifications consultation in finalising their report which will be submitted to the Council.
- 1.6 Subject to the Inspector finding, on examination, that the proposed Local Plan satisfies the tests of soundness (being positively prepared, justified, effective and consistent with national policy) (as well as any recommended objections being accepted by the Council), the Council can proceed to adoption of the Plan. It is anticipated that adoption can happen before the Government's deadline of December 2023 for up-to-date plans to be adopted. 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 policy changes and external events (for example Brexit and 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.
- 1.7 The Government plans to introduce a Planning Bill to fundamentally reform the planning system in England. Further clarification from the Government is awaited and it is acknowledged that proposals for Local Plan reform will take considerable time including

primary and secondary legislation. In order to meet the 2023 statutory deadline, it remains important to progress the Local Plan as a replacement for the 2012 version, with a now agreed, albeit still challenging housing target, and the desire to deliver not only Corporate Plan outcomes but also more urgently the Council's Covid Recovery Framework and help facilitate social and economic recovery.

Response to Local Plan Reg 19

- 1.8 The Local Plan Reg 19 was subject to extensive public consultation during the summer of 2021. This provided the opportunity for interested parties and statutory consultees to respond on the soundness and legality of the Local Plan helping to frame scrutiny of the document at the EIP. Boroughwide engagement events were held online with regular outputs on social media to publicise the Plan and the opportunity to make comments on it. The Council's 'Engage Barnet' was also used as an engagement tool to help explain how to get involved at the more focused Reg 19 stage consultation. A six minute video explaining the Local Plan was also produced as part of the Reg 19 publicity.
- 1.9 Consultation on the Reg 19 Local Plan generated around 800 representations from 150 individual representors including statutory agencies, neighbouring boroughs, developers and landowners. Both Barnet Labour and Liberal Democrat groups submitted responses. There has been a good response across the Borough from residents associations, amenity societies, community and environmental groups as well as individual residents. Their representations at Reg 19 will give them the opportunity to request participation in the EIP from the Inspector and thereby focus the debate at hearing sessions on any outstanding matters.
- 1.10 The Schedule of Representations is set out in Appendix B. As part of the EIP process the Council will be responding to the issues raised by these representations. It will also produce a series of Statements of Common Ground to help clarify and resolve issues before the EIP. These will be submitted as part of the EIP and help form the basis of certain proposed modifications.
- 1.11 The Mayor of London has confirmed that Barnet's Local Plan is in general conformity with the London Plan. This includes our approach on parking standards. The Mayor has requested a small number of changes to be more consistent with the London Plan. The Environment Agency have raised strong concerns on site proposals subject to flood risk and have also requested a Sequential Test justification for the proposals. Historic England have expressed concerns about the Tall Buildings policy (CDH04) being ambiguous if the proposed Designing for Density SPD is set to provide further detail on heights. We will seek to resolve these strategic issues in the lead up to the EIP through Statements of Common Ground. These will also be used for clarifying and resolving issues raised by neighbouring boroughs and helping to demonstrate Barnet having met the Duty to Co-operate.
- 1.12 It is important to note that the Reg 19 response to the 52 policies and 65 site proposals generated about 70 supporting comments as well as objections. However it is the consideration of the objections that will form the main focus of the EIP. A summary of the policies are set out below together with a brief overview of the policy areas that generated the most responses:

Vision, Growth and Spatial Strategy

- Barnet's **Vision and Objectives** sets out the spine of the Local Plan outlining the benefits of well planned growth between 2021 and 2036. They reflect the four overarching principles of the Barnet Plan (Clean, safe and well-run, Family friendly, Healthy and Thriving) with the Local Plan providing the spatial expression of these priorities.
- Barnet's Spatial Strategy for growth highlights that by focusing on sustainable locations the impacts of development on the climate will be better managed, green belt and prevailing suburban character protected. 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 Town and Country Planning (Use Classes) Order 1987 from 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 (**GSS01**) will be focused. This policy framework further shapes the regeneration of **Brent Cross (GSS02)** and **Colindale (GSS06)**, as well as identifying new areas of significant growth in main town centres at **Cricklewood (GSS04)** and **Edgware (GSS05)** and around new (as at **Brent Cross West – GSS03**) and existing public transport nodes. Policies for these Growth Areas provide the strategic basis for more detailed area planning frameworks to come forward as well as further safeguards on the contributions of small sites and the use of area wide design codes in delivering new homes.
- The Local Plan's approach to **Brent Cross (GSS02)** 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. Highlights that the Council seeks comprehensive development of the Brent Cross Growth Area. The approach 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. Progress on Brent Cross will be measured against appropriate milestones in the Local Plan.
- **Mill Hill East (GSS07)**, 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. The Plan emphasises that growth must support public transport improvements and demonstrate how sustainable transport options will be provided. It also makes clear that there will be no development on Green Belt unless the land is previously developed land.
- In addition to Cricklewood and Edgware Main **Town Centres (GSS08)** 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. These frameworks will reflect their distinctive local character and outline unique opportunities in responding to the challenges faced. This section emphasises locational

opportunities for these Growth Areas, highlights the Healthy Streets Approach and the need for more flexible planning policy 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 (GSS09)** 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 reflected in the policy on **Redevelopment of Car Parks (GSS12)** with requirements set out 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 (GSS10)** providing opportunities for improving accommodation and quality of the urban form ensuring that estate regeneration and infill is carried out in collaboration with local residents.
- Policy on **Major Thoroughfares (GSS11)** 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 (and not in others) and emphasises that development must have a positive impact on thoroughfares and design should relate to suburban streets behind it. The Council will produce SPD on Designing for Density which amongst detailed consideration will set out, within such locations, further design guidance for optimising density and design guidance for considering that appropriateness or otherwise of tall building proposals.
- Policy for **Strategic Parks and Recreation (GSS13)** supports outdoor facilities that encourage physical activity and assist mental well-being.

Overview of Reg 19 response to Vision, Growth and Spatial Strategy

- *As the core of the Local Plan the Vision, Growth and Spatial Strategy generated attracted the most objections (around 200). Whilst the majority of these focused on Delivering Sustainable Growth significant local concerns were expressed about Town Centres, Mill Hill East and the Redevelopment of Car Parks.*

Housing

- 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 (HOU01)** and seeking a minimum level of 35 per cent delivery is set within the context of the London Plan. The Council's approach to First Homes including level of discount will be firmed up and clarified as part of the EIP. Priorities for ensuring an appropriate **Housing Mix (HOU02)** emphasise the number of bedspaces in terms of size priorities and highlights 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 and Redevelopment of Larger Homes (HOU03)** policy restricts such changes to areas around town centres or areas with good public transport accessibility.

- In terms of **Specialist Housing (HOU04)** 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 how the Council will manage student accommodation and HMOs to prevent harmful concentrations of such uses. To reduce demands on pressures for new build, policy on ensuring the **Efficient Use of the Housing Stock (HOU05)** resists loss of existing homes and set out how the impact of short term holiday lets is to be managed.
- Policy on **Meeting Other Housing Needs (HOU06)** sets out the approach to widening choice in terms of Build to Rent and Self-Build housing. Policy on **Gypsies, Travellers and Travelling Showpeople (HOU07)** highlights that there is no identified need for plots and pitches within Barnet and sets out how any proposals will be considered.

Overview of Reg 19 response to Housing Chapter

- *All policies attracted objections with the most contentious policy being the Local Plan's approach on housing mix which attracted representations from developers in terms of the policy being too restrictive and residents groups wanting more family sized accommodation.*

Character, Design and Heritage

- The **Character, Design and Heritage** Chapter 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 (CDH01)** and **Sustainable and Inclusive Design (CDH02)** as well as **Amenity Space and Landscaping (CDH07)**. Minimum requirements for residential space, internal layout and design as well as outdoor amenity space are clearly set out while policy CDH01 sets out requirements for Design Codes for small sites and further emphasises the Healthy Streets Approach. Policy on **Public Realm (CDH03)** emphasises the importance of development contributing to sense of place, community cohesiveness, health and wellbeing and highlights the use of town centre public realm strategies for addressing individual locations.
- In order to manage and respond to pressures for very tall buildings (15 storeys or more) the **Tall Buildings** policy (**CDH04**) sets out those strategic locations where tall and very tall buildings may be appropriate. The Council will produce SPD on Designing for Density which will set out, within such locations, further design guidance for assessing the appropriateness of tall and very tall buildings.
- Policies on **Extensions (CDH05)** and **Basements (CDH06)** have been introduced to guide proposals that exceed permitted development rights. Policy on **Advertisements (CDH09)** helps to better manage their impact on character and residential amenity.

Overview of Reg 19 response to Character, Design and Heritage Chapter

- *This Chapter attracted the second largest number of objections, the majority of which were from local amenity groups and residents focused on the Local Plan's approach to Tall Buildings. The approach to design also attracted significant objections from local groups.*

Town Centres

- The Chapter on **Town Centres** sets out how these locations will remain the focus for inward investment, vitality and viability despite retail change. The Local Plan

emphasises how the 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. The **Vibrant Town Centres (TOW01)** policy sets out the role that these locations play in delivering growth and improving their overall offer. Policy **TOW02** emphasises importance of protecting local parades of shops to ensure services are available for less mobile residents.

- Policy **TOW03** addresses the clustering of uses such as adult gaming centres, hot food takeaways, shisha bars, betting shops and money lenders. 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 (TOW04)** 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.

Overview of Reg 19 response to Town Centres Chapter

- *Local groups are largely supportive of the Local Plan’s approach on town centres but express concerns about implementation given the widening of permitted development rules in 2020. By contrast developers and landowners have called for further flexibility with town centre policy.*

Community Uses, Health and Wellbeing

- The **Community Uses, Health and Wellbeing** Chapter 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 (CHW01)** 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. It highlights 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.
- In **Making Barnet a Safer Place (CHW03)** the Local Plan sets out the measures that the planning system can take to improve community safety. **Public Houses (CHW04)** also contribute to community wellbeing. In response to the loss of such assets the Local Plan seeks to better safeguard them.

Overview of Reg 19 response to Community Uses, Health and Wellbeing Chapter

- *The Local Plan approach on Community Uses, Health and Wellbeing had a more positive reception than other chapters with supporting comments and suggestions for improvement and clarifications to providing community infrastructure, promoting health and wellbeing and making Barnet a safer place.*

Economy

- The **Economy** Chapter sets out in **ECY01** how enterprises will be supported and access to employment opportunities secured. It 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. 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 (ECY02)** 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 (ECY03)** policy.

Overview of Reg 19 response to Community Uses, Health and Wellbeing Chapter

- *The Local Plan approach on safeguarding employment land generated objections from landowners and developers. Concerns also expressed by developers about the justification for seeking affordable workspace while local groups wanted more action on job creation.*

Environment and Climate Change

- **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 (ECC01)** 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 and Water Management (ECC02 and ECC02A)**. The **Dealing with Waste (ECC03)** 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 (ECC04)** 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 (ECC05)** policy continues the robust protection of this land in accordance with NPPF and the London Plan. Policy on **Biodiversity (ECC06)** sets out Local Plan requirements from development that has an impact on biodiversity and habitat quality. Requirements for biodiversity net gain are clarified through on-site measures and by contribution to local biodiversity improvements.

Overview of Reg 19 response to Environment and Climate Change Chapter

- *This Chapter attracted a significant response from Barnet environmental groups and local residents expressing the view that policies on mitigating climate change, combatting pollution and promoting biodiversity do not go far enough. The Environment Agency have requested further changes to the policy on Water Management.*

Transport and Communications

- **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 (TRC01)** supports an improved transport network where dependency on the car is much reduced, requiring developments to provide healthy, safe attractive walking and cycling environments and advocates application of the Healthy Streets Approach in making non car travel more attractive. The **Transport Infrastructure (TRC02)** 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 (TRC03)** policy which also sets out the Council's process for establishing new Controlled Parking Zones. Zero car parking may be appropriate in areas with high Public Transport Accessibility Levels. Policy on **Digital Communication and Connectivity (TRC04)** emphasises the Council's aim to facilitate high speed broadband and clarifies requirements on the installation of telecommunications equipment.

Overview of Reg 19 response to Transport and Communications Chapter

- *Concerns continue to be expressed about the approach to parking management with residents associations, environmental groups, developers and Transport for London objecting to the proposed residential parking standards for a range of (sometimes conflicting) reasons.*

Delivering the Local Plan

- **Delivering the Local Plan** explains mechanisms for ensuring the infrastructure to support growth is secured. This reflects progress on the 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 and S106 funding.

Overview of Reg 19 response to Delivering the Local Plan Chapter

- *This Chapter does not have any specific policies and attracted few objections on soundness.*

Schedule of Proposals

- The **Schedule of Proposals** sets out 65 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, playing an important role in getting the right balance of development. and are also set out in a summary table within Annex 1 of the Local Plan.
- A site proposal sets out parameters - the expectations of development to which more detailed design led proposals should respond as part of a planning application. A proposal in the Local Plan carries significant weight and signals the application of Local Plan policies. Therefore, it is the weight applied to the raft of Local Plan policies that will provide the basis for determining an application for planning permission as well as relevant material considerations.
- As part of the site proposal there is a requirement to set out an indicative housing capacity, considered through using a high-level methodology known as a Density Matrix (categorising areas by character such as suburban, urban or central and considering public transport accessibility levels to approximate an acceptable level of no. of units per hectare). This is a high-level desk-top calculation. Therefore, only proportionate weight is given to these indicative numbers until such time as design-led detailed planning application comes forward. For the purpose of the Local Plan these high-level numbers are used to support the Council's ability to meet Barnet's overall housing target and demonstrate that the Plan has proactively identified sufficient sites to do so.
- Site proposals have been drawn from several 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 Green Belt, 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 provide detailed planning consent nor do they 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 consents being implemented that they will be deleted as site proposals in the emerging Local Plan.

Overview of Reg 19 response to Schedule of Proposals

- *Over 200 objections were directed at the 65 site proposals in Annex 1 of the Draft Local Plan with the most contentious sites being Finchley Central (site 30), sites 34 to 42 that form part of the Hendon Hub project, Watchtower House (site 49) in Mill Hill, site 9 in Colindale and East Finchley Station Car Park (site 24). Proposal site 45 (Whalebones Park), where a planning application is currently subject to appeal. Developers and landowners have requested new proposals predominantly on land that is safeguarded as Green Belt or for employment purposes to be added to the Plan. The responses on the site proposals demonstrate the balancing act the Local Plan has to perform. Whilst some responses are resistant to development others are pushing for more and more and greater flexibility and freedoms.*

Local Development Scheme

- 1.13 When submitting a Local Plan for examination one of the supporting documents that the examining Inspector will expect to receive is an up-to-date LDS. This LDS sets out a programme for Local Plan document production up to 2024 and will supersede the previous version that the Council published in January 2020.
- 1.14 This LDS sets out the Council's intention to review the Brent Cross Cricklewood Growth Area Planning Development Framework. Initially produced in 2005 and reflected in still extant saved policies from the 2006 Unitary Development Plan, this Framework covering the Cricklewood, Brent Cross and West Hendon Regeneration Area, requires updating to reflect the progress made and the terms of the outline planning consent originally granted in 2010 (as amended in 2014) and subsequent detailed applications.
- 1.15 Following adoption of the Local Plan it will be necessary to ensure that the guidance provided in SPDs referred to in the new Barnet Local Plan policies are suitably updated. This LDS therefore sets out a programme for the production and updating of these SPDs over the next three years, comprising the production of:
 - a new SPD on Designing for Density responding with the need for detailed guidance on the different models for achieving high density and high design quality ;
 - review and merging of existing residential design and sustainable design and construction SPDs into one Sustainable Design & Development Guidance SPD and,
 - updating of the existing SPDs on Planning Obligations (renamed Planning Contributions) and Green Infrastructure.

- 1.16 The previous LDS highlighted the Council's intention to produce area planning frameworks with neighbouring boroughs with regard to Brent Cross West and New Southgate. This still remains the Council's intention and is now reflected in the draft Local Plan. Without detail on the scope, funding and timetable for such documents it is not appropriate to list them in the LDS. When details become clearer they will be featured in a future revision of the LDS.
- 1.17 The previous LDS also highlighted the intention to produce a SPD focusing on Whetstone Town Centre. This has not progressed in the short-term as a planning document. Although no specific reference is made in the draft Local Plan to a Whetstone Town Centre SPD it remains the Council's intention to use more detailed area frameworks such as SPDs to pursue the individual planning objectives for each of the District Town Centres in the Borough. When details become clearer about a planning framework for Whetstone or any other District Town Centre they will be featured in a future revision of the LDS.
- 1.18 In this LDS the Council has prioritised the production of a new planning document to support the continued implementation of the Colindale Area Action Plan. This planning master-plan will cover Burnt Oak and Colindale and will help establish future priorities for healthy and connected places as well as place-based initiatives in that area.
- 1.19 The revised LDS also includes reference to the current review of Barnet's Community Infrastructure Levy (CIL) charging schedule. Following examination later this year, it is anticipated that the revised CIL charging schedule will be in place early in 2022. It is therefore intended that the revised CIL rates will be applied alongside the policies in the draft Local Plan once adopted.

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 change 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 SoS (in respect of appeals) in an incremental and reactive 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 Council's Community Infrastructure Levy, 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 In early 2020 the Local Plan Preferred Approach (Reg 18) was published. This 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.
- 3.2 In response to the representations to the Reg 19 consultation the Council could choose not to progress towards submission and EIP. However, this would risk not having a Plan in place by the Government's December 2023 deadline leaving Barnet with a current plan that is almost 10 years out of date and a planning strategy that no longer responds to the immediate pressures and challenges the borough is facing. This could further risk Secretary of State intervention, particularly if the Council fail to deliver on an agreed housing target, which whilst challenging is considerably less than the previous MHCLG method outcome. As set out in para 1.5 there will be opportunity for the Council to put forward modifications to the Inspector and all modifications to the submitted Local Plan will be subject to further public consultation by the Planning Inspector as part of the EIP process.
- 3.3 In terms of the LDS the alternative option is not to update it. This severely risks being criticised by the Inspector appointed to examine the Local Plan, and ultimately could even provide a reason for finding the plan to be unsound. This option would also send out a negative message to residents, businesses and the development industry that the Council is not prepared to manage new challenges and opportunities facing the Borough.

4. POST DECISION IMPLEMENTATION

- 4.1 Following referral to Council on October 19th and, in the event of their agreement to submit the Local Plan to the SoS an Inspector will be appointed to undertake the EIP (EIP). This is outlined in paras 1.3 to 1.6 above.
- 4.2 In the event of approval by Committee of the LDS a statement of confirmation will be published on the Council's website. A copy of the updated LDS will then also be included in the package of supporting documentation that is submitted to the SoS with the Local Plan.

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 Barnet Plan, Growth Strategy, Housing Strategy, Long Term Transport Strategy and Health and Wellbeing Strategy. It will deliver against the four main priorities of the Barnet Plan 2021 to 2025 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 (TOW03) and helping to further reduce waste by prioritising the circular economy of waste management (ECC03);
- The Local Plan has specific policy (CHW03) on Making Barnet a Safer Place. Ensuring that places are attractive and safe destinations worth visiting and enjoyed is a feature of policies on Public Realm (CDH03) and the Night Time Economy (TOW04);

- Ensuring that new development is sustainable and meets the highest standards of inclusive design (CDH02) removing physical barriers to enable all to share in Barnet's growth; and
- Through the Healthy Streets Approach (CDH01, TRC01, TOW01) the Local Plan promotes safe and attractive environments that further help encourage walking, cycling and use of public transport for getting around Barnet.
- Family friendly – enabling opportunities for our children and young people to achieve their best -
 - Ensuring we are and remain a family friendly borough is reflected throughout the Local Plan in particular policies on Mitigating Climate Change (ECC01), Affordable Housing (HOU01), Housing Mix (HOU02), as well as Sustainable and Active Travel (TRC01);
 - Enabling young people to enjoy and get the best out of our natural environment is helped by policies on Barnet's Parks and Open Spaces (ECC04), Green Belt and Metropolitan Open Land (ECC05) and Biodiversity (ECC06);
 - Local Plan design policies will help families by delivering new high quality homes that meet space standards (CDH01) and requirements for amenity space and landscaping (CDH07) whilst addressing environmental considerations such as noise and air pollution (ECC02) and flood risk (ECC02A);
 - Housing Policy (HOU04) responds to specialist needs for accommodation helping vulnerable people to live independent lives;
 - Specific policy on Local Jobs, Skills and Training (Policy ECY03) sets out how the Local Plan will help people access the employment opportunities generated by growth;
 - The Infrastructure Delivery Plan (IDP) which supports the Local Plan together with contributions from development through S106 and Community Infrastructure Levy (CIL) helps to ensure the Council has good schools and enough school places (CHW01) so all children have access to a great education;
 - Having good transport infrastructure (TRC02) and a sustainable approach to car parking (TRC03) helps children, young people and their families to get around the Borough; and
 - In ensuring the needs of children are considered the Local Plan seeks to tackle childhood obesity by not allowing any new hot food takeaways(TOW03) within 400 metres of a school or youth centre.
- Healthy – a place with fantastic facilities for all ages, enabling people to live happy and healthy lives -
 - Getting the right facilities in the right place at the right time is the objective of Policy CHW01 on Community Infrastructure;
 - COVID19 highlighted the importance of having access to open space and the natural environment for health and well-being (ECC04, ECC05, ECC06) as well as ensuring that new homes meet housing standards (CDH01 and CDH07);
 - Policy on promoting health and wellbeing (CHW02) highlights how much it is the most cross-cutting issue in the Local Plan reflected in a wide range of policies supporting healthier lifestyles from delivering the Healthier Catering Commitment (TOW03) and in recognition of their contribution to community cohesiveness protecting public houses (TOW05) to Sustainable and Active Travel (TRC01) and mitigating air pollution (ECC02), as well as;
 - Creating a sense of place that encourages social interaction and physical activity is an aim of the policy on Public Realm (CDH03) helping to 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 -
 - Policies to create a Vibrant Local Economy (ECY01) and Affordable Workspace (ECY02) help to safeguard existing employment floorspace and secure new affordable floorspace from development. Utilising vacant space in Barnet’s town centres (TOW02) for meanwhile uses is supported when it contributes to vitality and viability;
 - Policies in the Housing and Character, Design and Heritage Chapters seek to provide homes that meet housing aspirations and needs, including access to good quality affordable housing (HOU01), providing housing choice (HOU05), while protecting existing stock that contributes to character (HOU03) and providing direction on extensions and basements (CDH05 and CDH06);
 - Chapter on Delivering the Local Plan sets out mechanisms for securing funding from growth to invest in 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 and helps deliver community and transport infrastructure prioritised in CHW01, GSS09 and TRC02; and
 - The Local Plan approach to delivering sustainable growth (BSS01, GSS01 to GSS13) 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. This includes clearly setting out an approach for Tall Buildings identifying the strategic locations where they may be appropriate subject to satisfying a range of design criteria (CDH04).

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 as is production of the LDS but the cost of EIP and any associated legal costs is excluded and will need to be funded by the Council in late 2022 and early 2022-23 (estimated budget is £150k to allow for uncertainties). The costs associated with preparing the 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 Council signed a Service Level Agreement with the SoS in August 2021. This Agreement sets out the steps each party will take to help deliver an efficient examination and reporting process.

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 Planning decisions must be taken in accordance with the statutory development plan (which includes the local plan) unless material considerations indicate otherwise (s.38(6), Planning and Compulsory Purchase Act 2004 (PCPA 2004)). The Local Plan must be prepared in accordance with the “local development scheme” (s.19(1), PCPA 2004). The Local Plan must have regard to, amongst other matters, national planning policies and guidance, and the London Plan (s.19(2), PCPA 2004 and Reg. 10 Town and Country Planning (Local Planning) (England) Regulations 2012 (LPR 2012).

5.4.2 The Council is required to submit each “development plan document”, e.g. its proposed Local Plan, to the Secretary of State for independent examination (s.20, PCPA 2004) by a person appointed by the Secretary of State. The purpose of the examination is for the Inspector to determine whether: (1) the plan has been prepared in accordance with the relevant plan-making legislation (ss. 19 and 24(1), PCPA 2004); (2) the plan is “sound” (para 35, NPPF) and (3) the Council has complied with the “duty to cooperate” (s33A, PCPA 2004).

5.4.3 When submitting the proposed Local Plan for examination, the Council is required to submit the following documents:

- the sustainability appraisal report;
- a submission policies map if the adoption of the local plan would result in changes to the adopted policies map;
- a statement setting out—
 - which bodies and persons the local planning authority invited to make representations under regulation 18;
 - how those bodies and persons were invited to make representations under regulation 18;
 - a summary of the main issues raised by the representations made pursuant to regulation 18;
 - how any representations made pursuant to regulation 18 have been taken into account;
 - if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - if no representations were made in regulation 20, that no such representations were made;
- copies of any representations made in accordance with regulation 20; and
- such supporting documents as in the opinion of the local planning authority are

relevant to the preparation of the local plan

5.4.4 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 a lack of political and local support for the Local Plan. This can be addressed by briefing members, setting out the vision and objectives of the Local Plan clarifying what it can positively deliver whilst highlighting the consequences of not having an up-to-date planning framework for the Borough.

5.6 Equality Act 2010

5.6.1 The Equality Act 2010 (EqA 2010) provides a single general *public sector equality duty* (PSED) which applies to public authorities exercising public functions. The Council is such a public authority exercising its public function in preparing the proposed Local Plan for its area in its capacity as the local planning authority. The PSED comprises three limbs (s.149(1)), namely, 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 under the EqA 2010 (s.149(1)(a));
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it (s.149(1)(b)). This involves having due regard to -
 - remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - 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 (section 149(4)); and
 - 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.

Note: s.149(6) makes it clear that compliance with the PSED in s.149(1) may involve treating some people more favourably than others, but that is not to be taken as permitting conduct that would otherwise be prohibited by

or under the EqA 2010 (this includes breach of an equality clause or rule or breach of a non-discrimination rule (s.149(8)).

- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not (s.149(3)).

5.6.2 The relevant “protected characteristics” are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation (S 149(7)).

5.6.3 The EqA 2010 does not define what is required to “have due regard” for the purposes of the PSED. The courts have, however, set general principles to be followed if the duty is to be discharged, namely:

- (a) decision-makers must be made aware of their duty to have due regard to the identified needs;
- (b) regard should be had to the duty (to have due regard) before, and at the time, a particular policy is considered.
- (c) it is not a question of ticking boxes - the duty must be approached in substance, with rigour and with an open mind, and a failure to refer expressly to the duty whilst exercising a public function will not be determinative of whether due regard has been had;
- (d) the duty is non-delegable;
- (e) the duty is continuing;
- (f) it is good practice for an authority to keep a record showing that it has considered the identified needs.

5.6.4 The EqA 2010 does not require public authorities to produce equality impact assessments (EQIAs) but it is common for these to be prepared as these documents are an effect method of demonstrating evidence that the appropriate systematic analysis has been conducted to establish whether a decision, for example a change in policies in the proposed Local Plan, will have an adverse impact in terms of equalities.

5.6.5 The Local Plan, once adopted, has the potential to impact on all of those who live, work and visit the Borough. An EQIA has been undertaken as part of an Integrated Impact Assessment of the Local Plan. Policies contained within the Draft Local Plan could potentially have significant effects on those individuals who share one or more of the protected characteristics (identified in s.149(7), EqA 2010) and particularly within the context of housing, transport, employment, environment and inclusive design.

5.6.6 The EQIA identified that many of the policies would have a positive effect across 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 or practicable in some listed buildings. Where significant effects are identified, appropriate mitigation strategies need to be put in place to avoid or reduce impacts.

5.6.7 The Council recognises that (along with the other principles set out in para 5.6.3 above) the duty to “have due regard” is a continuing duty and, accordingly, evidence gathered from the analysis of the potential effects of the proposed Local Plan policies will be

updated in the EQIA as the proposed Local Plan progresses towards its anticipated adoption.

5.7 Corporate Parenting

5.7.1 In the policy on Specialist Housing (HOU04) the Local Plan sets out provision for people with social care and health support needs. This includes helping young people with complex needs to live as independently as possible within the community.

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 informed the Publication Local Plan (Reg 19) when representations were made on the 'soundness of the plan' as set out in the NPPF.

5.8.2 The Representations on the soundness of the (Reg 19) Publication Local Plan will be submitted to the SoS for the EIP along with the Local Plan and supporting evidence. This includes a Regulation 22(1)(c) consultation statement setting out how the LPA has complied with Regulations 18 & 19.

5.9 Insight

5.9.1 N/A

6. BACKGROUND PAPERS

6.1 Policy & Resources Committee - 16th June 2021 (Item 8) – Barnet's Local Plan – Publication - (Reg 19)

<https://barnet.moderngov.co.uk/ieListDocuments.aspx?CIId=692&MIId=10888&Ver=4>

6.2 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>

6.3 Policy & Resources Committee - 6th January 2020 (Item 12) – Local Development Scheme 2020

<https://barnet.moderngov.co.uk/documents/s56954/Local%20Development%20Scheme%202020.pdf>

6.4 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>

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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**

Contents

1	Chapter 1 – Introduction	6
2	Chapter 2 Challenges and Opportunities	13
3	Chapter 3 - Barnet’s Vision and Objectives	22
4	Chapter 4 – Growth and Spatial Strategy	32
5	Chapter 5 – Housing.....	81
6	Chapter 6 - Character, Design and Heritage	110
7	Chapter 7 - Town Centres	147
8	Chapter 8 - Community Uses and promotion of health and wellbeing	167
9	Chapter 9 - Economy.....	187
10	Chapter 10 - Environment and Climate Change.....	202
11	Chapter 11 - Transport and Communications.....	240
12	Chapter 12 - Delivering the Local Plan.....	258
13	Appendix A – List of Technical Evidence.....	269
14	Appendix B – Acronym Buster and Glossary.....	271
15	Appendix C - Replacement of Local Plan Policies.....	280
16	Annex 1 – Schedule of Site Proposals	283

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;

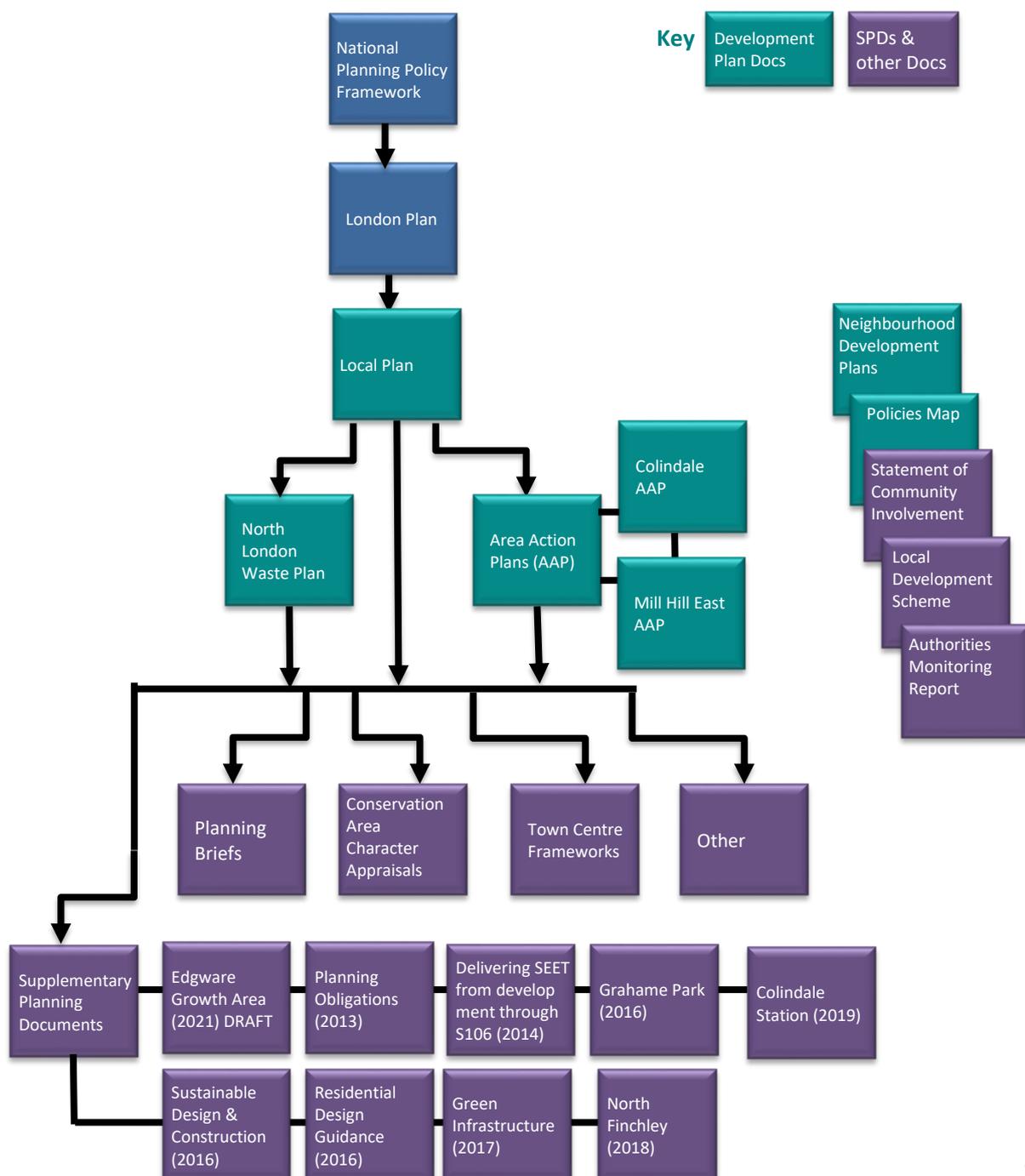
Justified – an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence;

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.

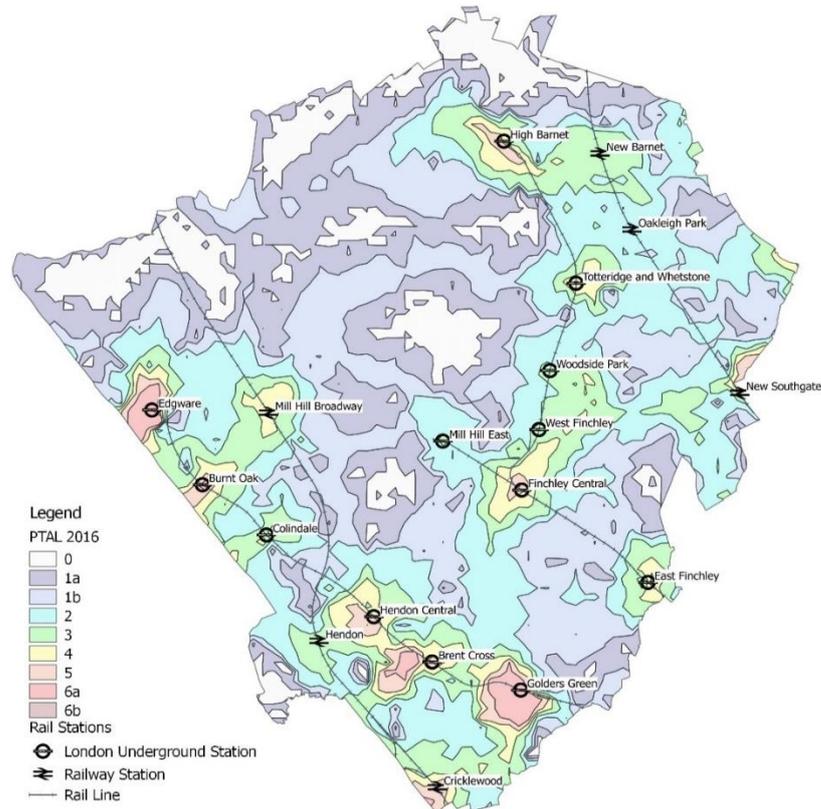
2.7 Health and Wellbeing

- 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

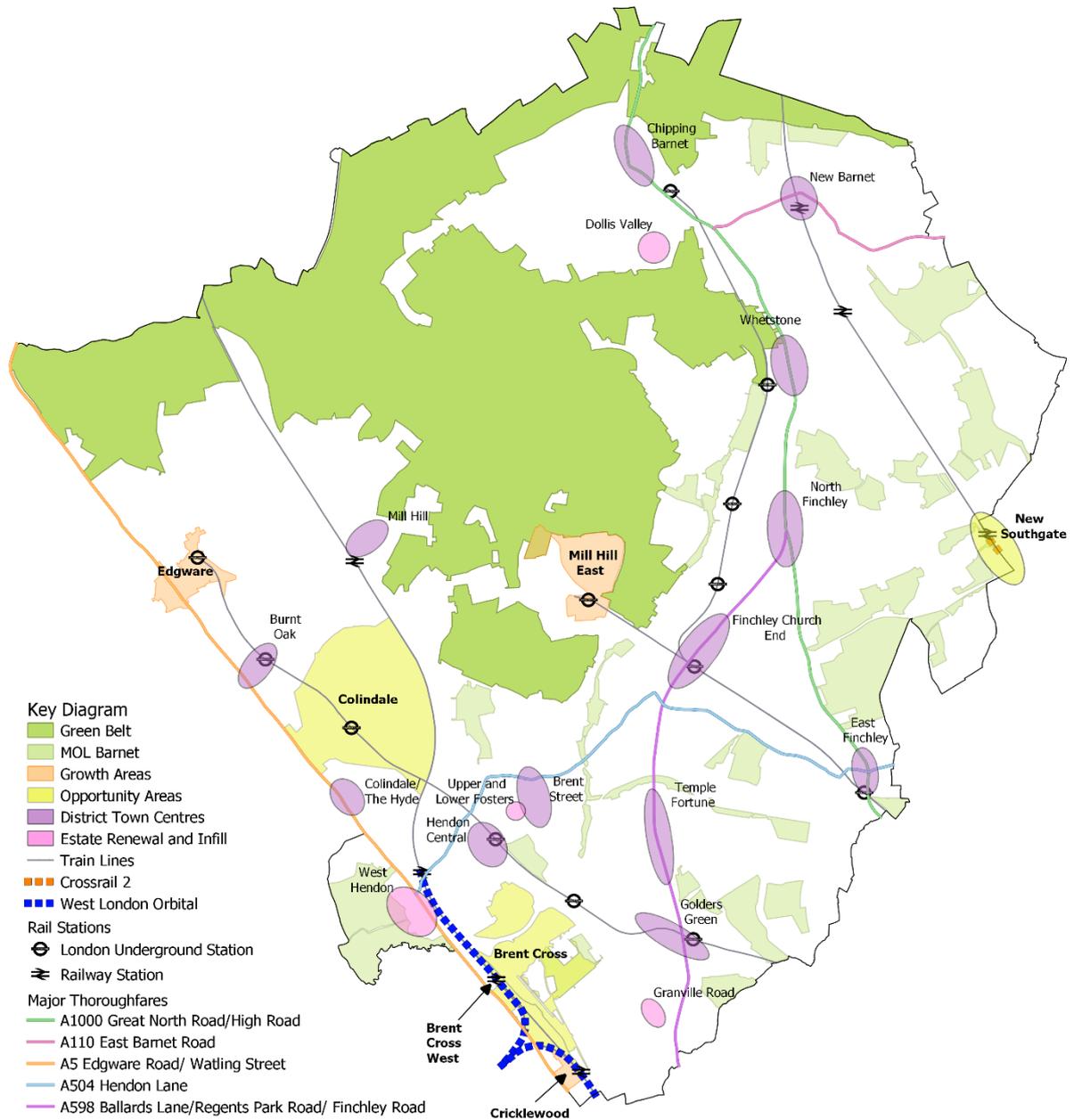
a) In order to make the Council's vision for Barnet happen, the Local Plan seeks to deliver between 2021 and 2036:

- 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	2250	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.

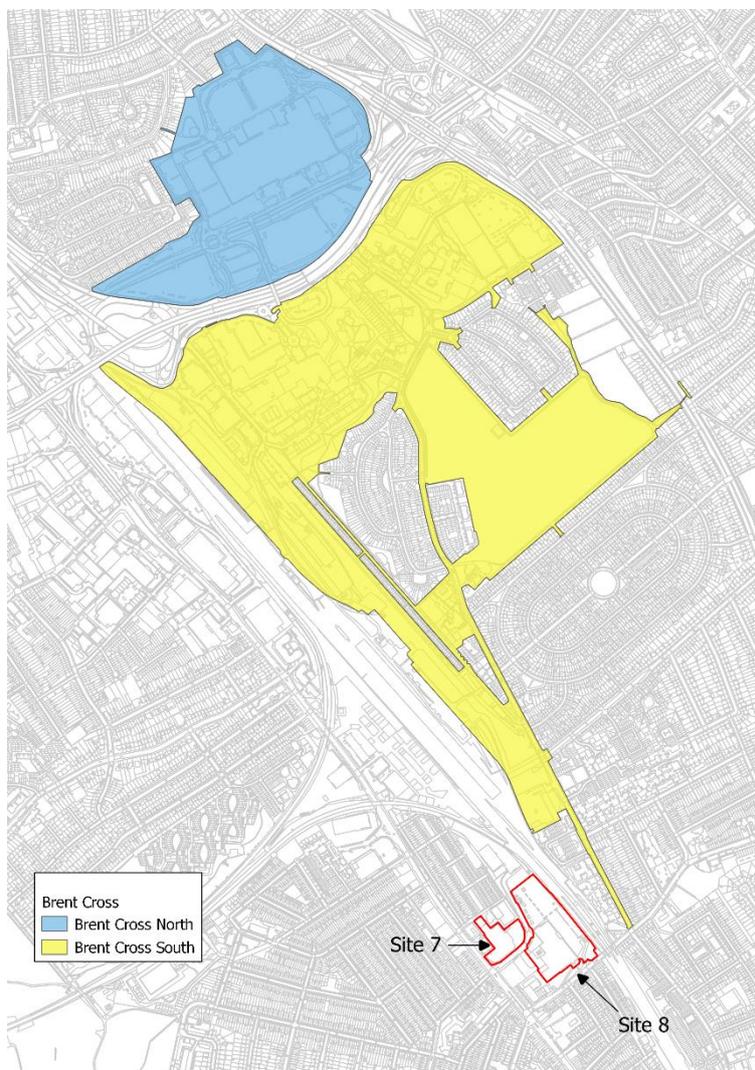
4.10 Comprehensive Development

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.

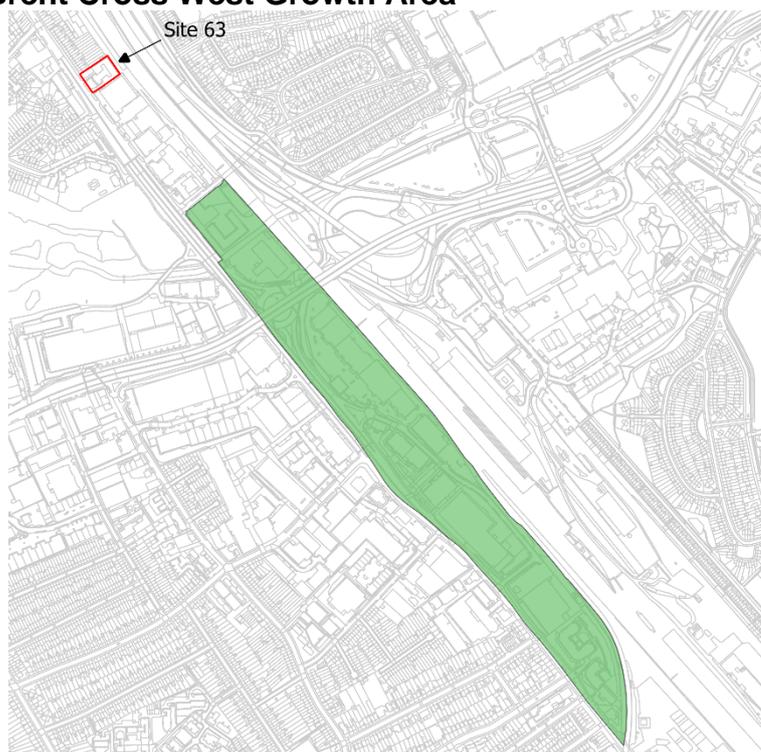
Progress of Brent Cross

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.

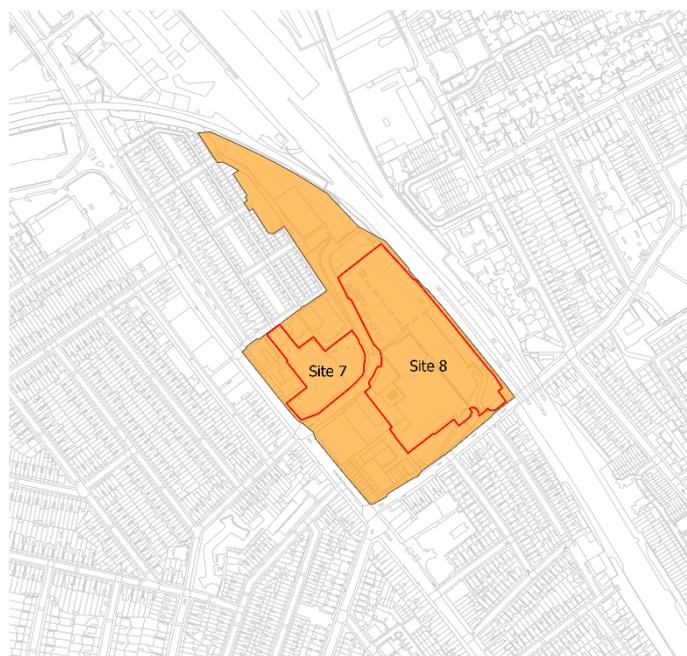
Development proposals will need to bring forward the following through detailed design, planning conditions and/ or contributions secured through Section 106 agreements:

- 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.

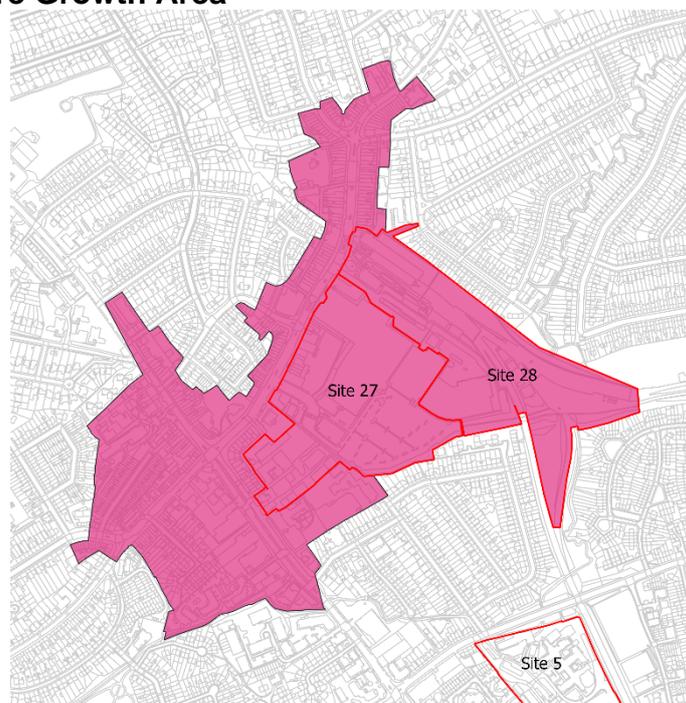
4.18.3 The Town Centre is an important commercial driver of the local economy and provides a range of important employment opportunities, largely in high street retailers and office work.

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)

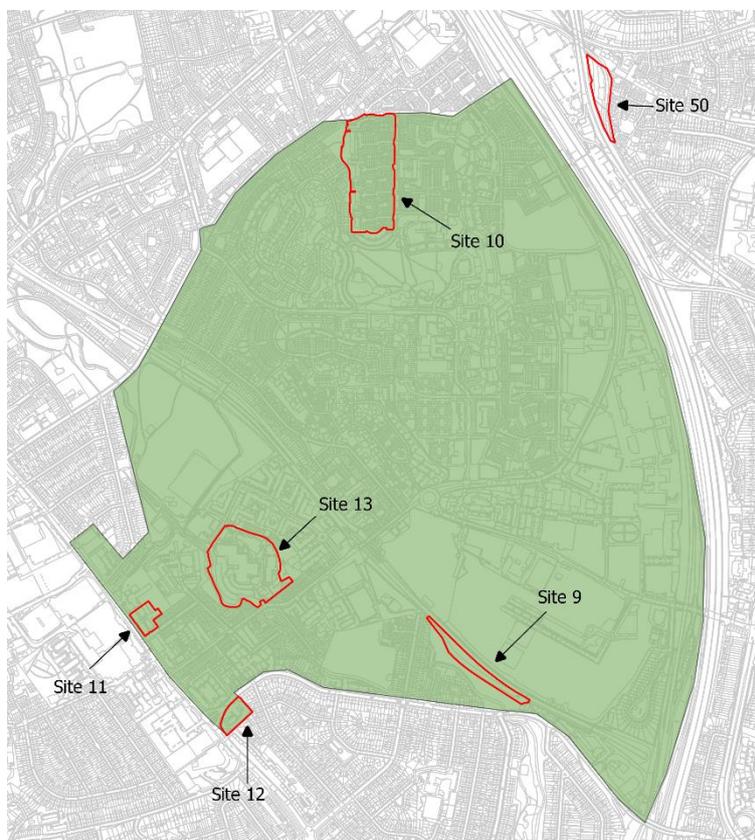
- Grahame Park SPD (2016)
- Colindale Station SPD (2019).

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 bedroomed 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.

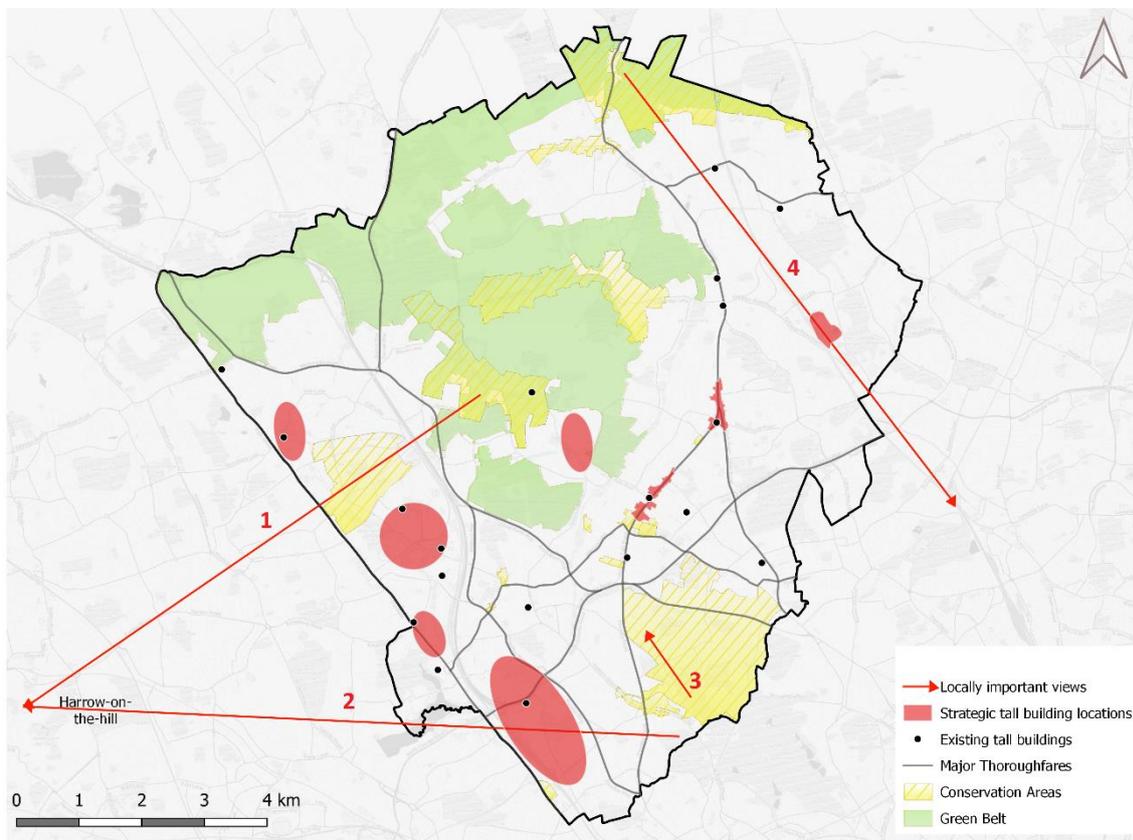
6.18 Tall Buildings

- 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.

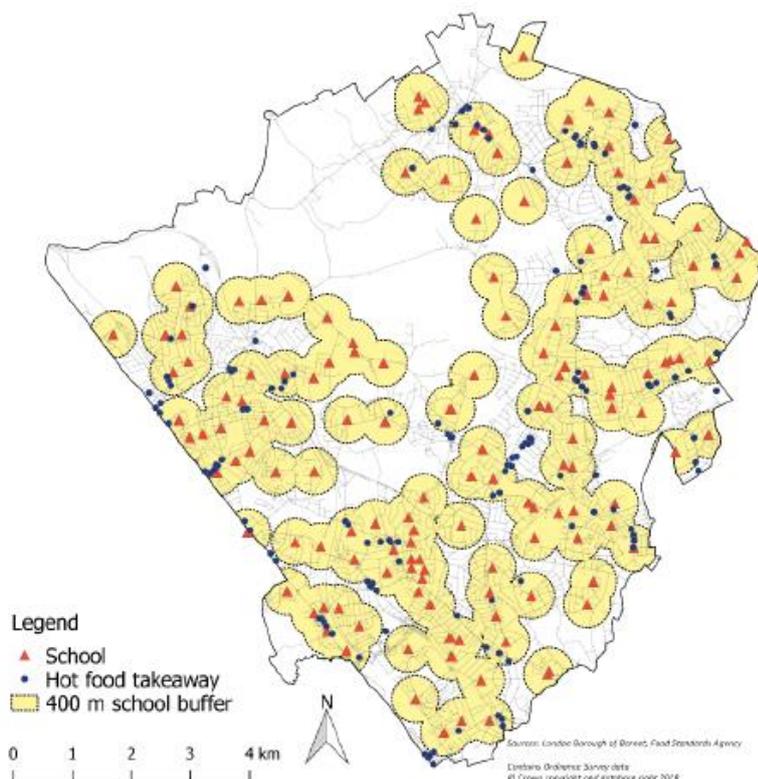
7.8 **Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars.**

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

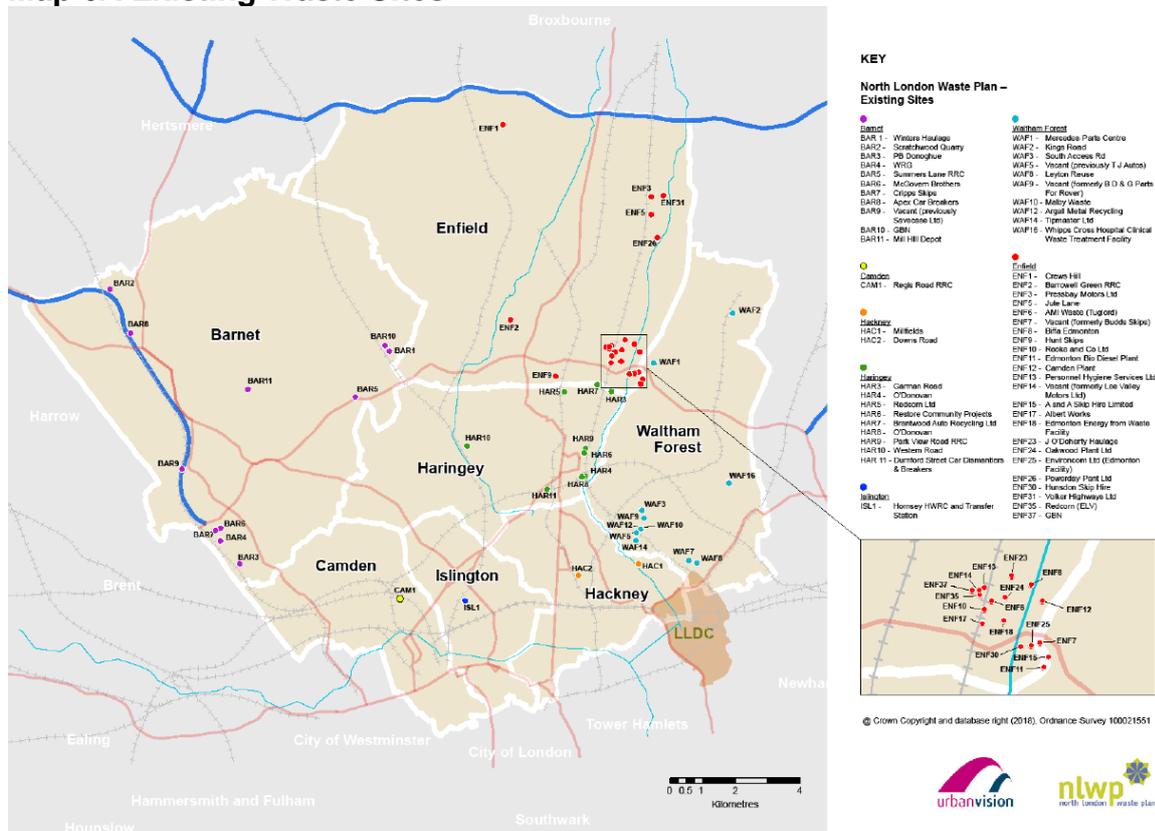
10.16.1 Barnet needs to find better ways of dealing with its waste and taking more responsibility for dealing with it within London rather than sending it to landfill in places such as Bedfordshire. The North London Waste Authority (NLWA) has produced a Joint Waste Strategy which forms the basis for 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**

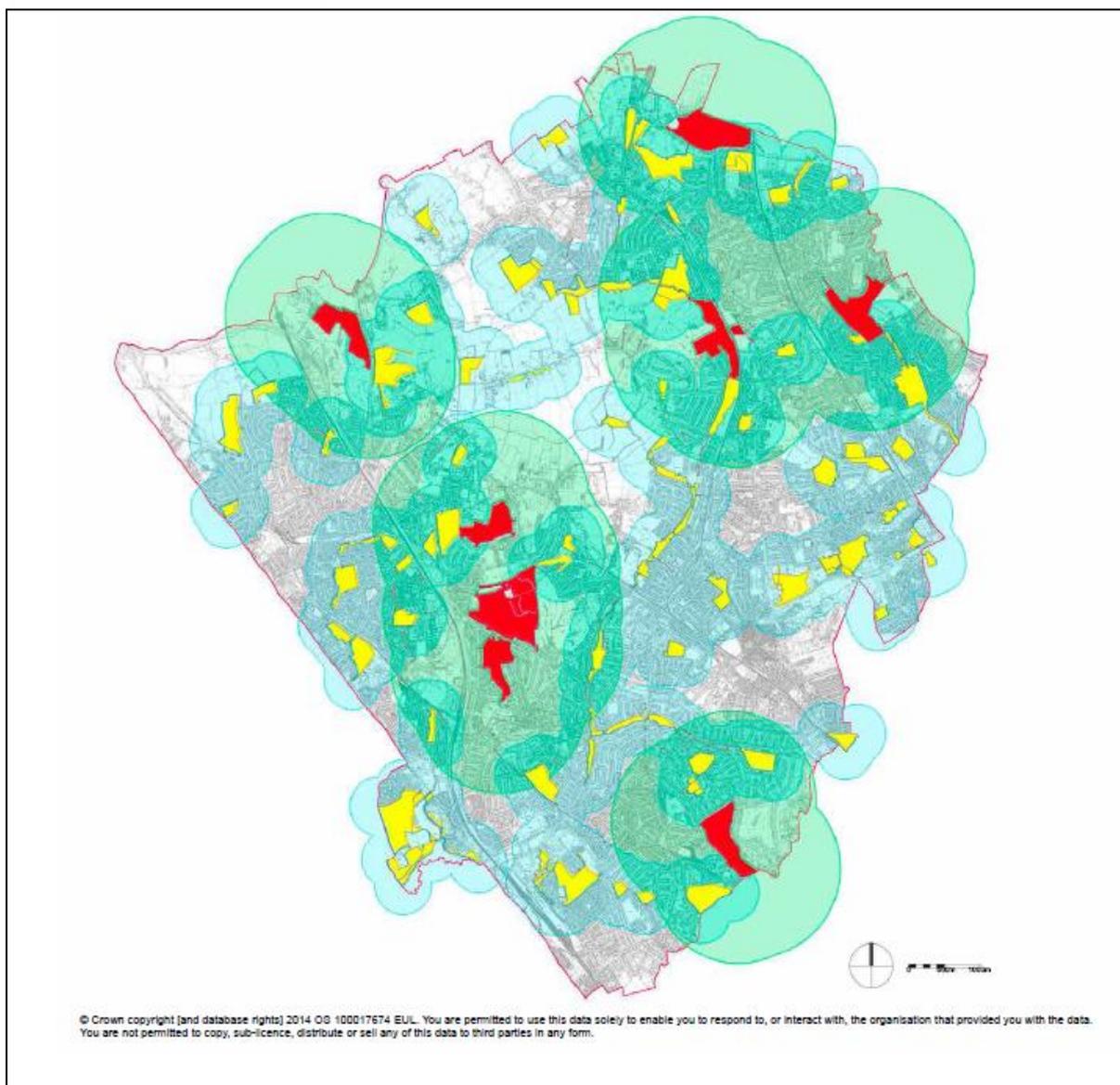
10.19.1 Barnet has 10 district parks and 77 local parks ranging in size from Hamilton Road Playground (0.04 ha) to Monken Hadley Common (41 ha). These are categorised according to the London Plan public open space hierarchy. Changes to the Policies Map show Barnet's parks and public open spaces. The 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

- Borough Boundary
- District Parks
- Local Parks
- 400 m Catchment Area
- 1.2 km Catchment Area



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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 tools⁶³ 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"> Sulloniacis 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.

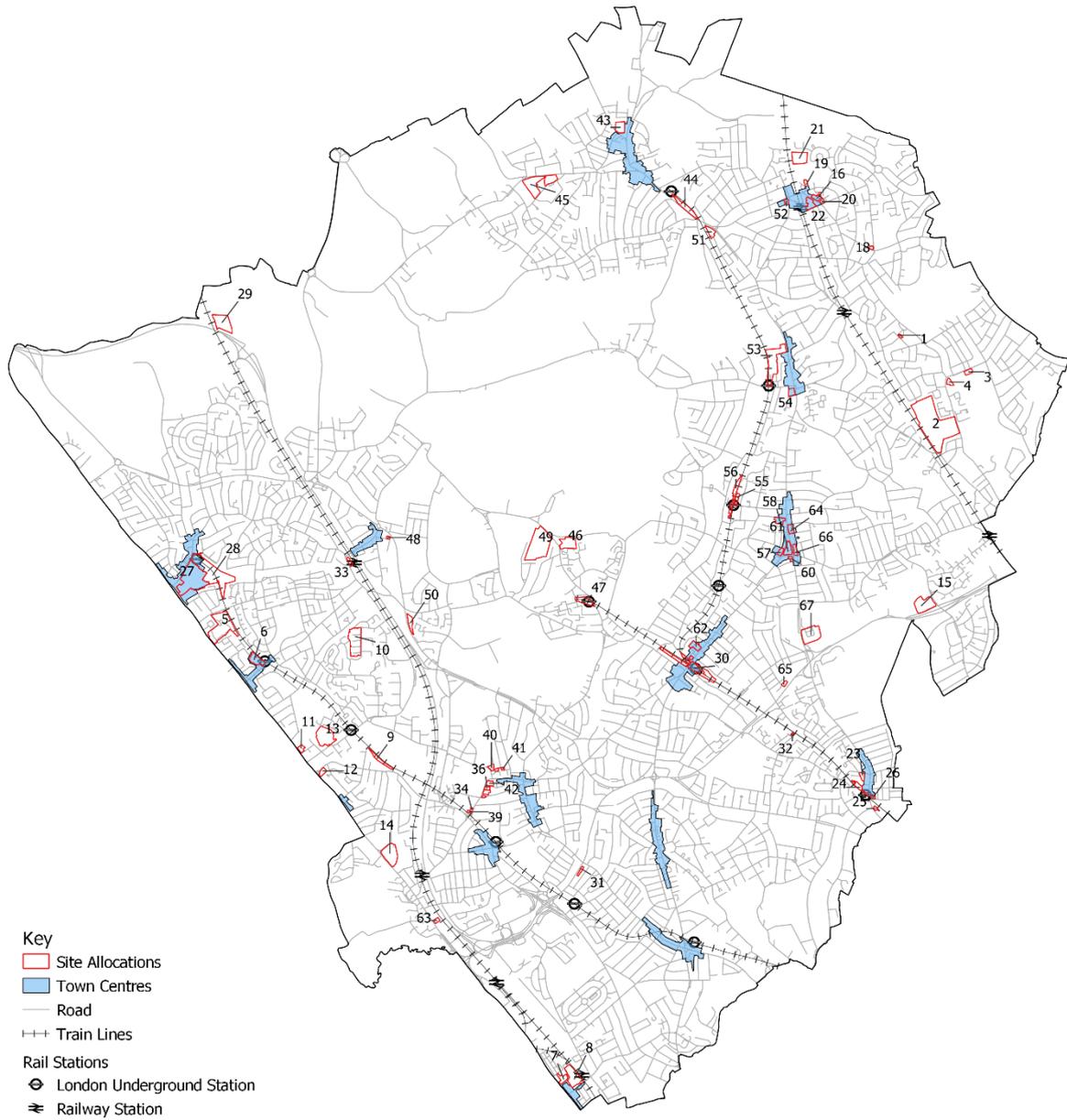
16	45-69 East Barnet Rd (New Barnet town centre)	East Barnet	45-69 East Barnet Rd, New Barnet, EN4 8RN	110	Commercial (retail and office)
17			Site number retained to provide consistency of numbering between the Plan versions.		-
18	Former East Barnet Library	East Barnet	85 Brookhill Rd, New Barnet EN4 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	-

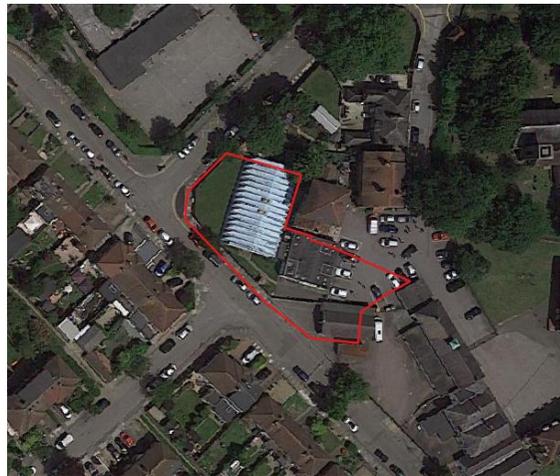
32	Manor Park Road car park	Golders Green	72-76 Manor Park Rd, East Finchley, N2 0SJ	7	-
33	Bunns Lane Car park (Mill Hill Town Centre)	Hale	Bunns Lane, Mill Hill, NW7 2AA	43	Hotel and car parking
34	Burroughs Gardens Car park (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 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

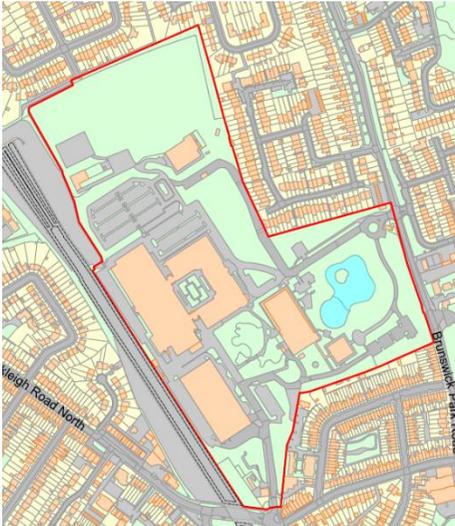
48	Mill Hill Library	Mill Hill	Hartley Avenue, NW7 2HX	19	Community
49	Watchtower House & Kingdom Hall (Mill Hill Growth Area)	Mill Hill	The Ridgeway, Mill Hill, NW7 1RS/ 1RL	224	Open Green Belt and community uses
50	Watford Way & Bunns Lane (Major Thoroughfare)	Mill Hill	Adjacent to Watford Way, Mill 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		
	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>	

	<p>Existing or most recent site use/s:</p>	<p>Community facilities, associated car park, access road to primary school</p>	
<p>Development timeframe:</p>	<p>0-5 years</p>		
<p>Planning designations:</p>	<p>Metropolitan Open Lan (MOL)</p>		
<p>Relevant planning applications:</p>	<p>None</p>		
	<p>Site description:</p>	<p>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.</p>	
<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS12, HOU01, HOU02, CDH01, CDH02, CHW01, CHW02, ECC02, ECC04, TRC01, TRC03</p>		
<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>25% residential floorspace with 75% floorspace for community uses, school access and retained parking</p>		
<p>Indicative residential capacity:</p>	<p>16</p>		
<p>Justification:</p>	<p>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>		
<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		
	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		
	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. Burnet 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.	

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			
	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			
	<p>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.</p>			
	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, ECY03, 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)	

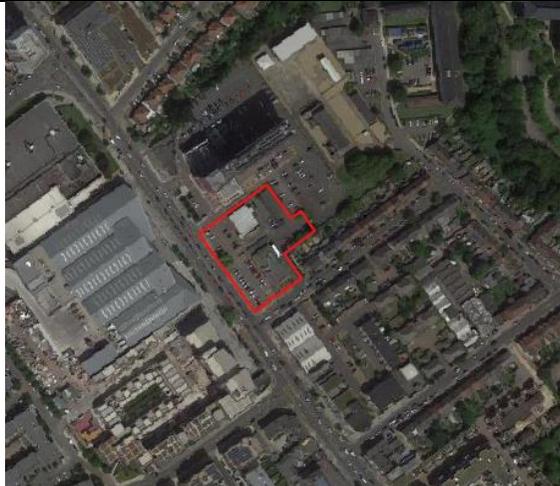
	Site source:		Call for sites	
	Context type:		Urban	
	Existing or most recent site use/s:		Vacant; surplus railway corridor land.	
	Development timeframe:		6-10 years	
	Planning designations:		Site of Borough Importance for Nature Conservation; Green Chain	
	Relevant planning applications:		None	
	Site 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.		

<p>Site requirements and development guidelines:</p>	<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, ECU03, ECC02, CHW02, TOW03, TRC01, TRC03</td> </tr> </table>		Applicable Draft Local Plan policies:	GSS01, GSS06, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, ECU03, 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, ECU03, 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											
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<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.											
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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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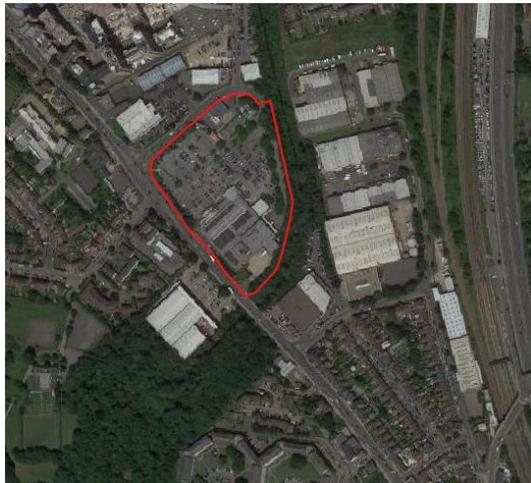
Site No. 12	McDonald’s Restaurant		
Site Address:	157 Colindeep Lane, NW9 6BD		
	Ward:	Colindale	
	PTAL 2019:	3	
	PTAL 2031:	3	
	Site Size:	0.48 ha	
	Ownership:	Private	
	Site source:	Colindale Area Action Plan	
	Context type:	Central	
	Existing or most recent site use/s:	Fast food restaurant and take-away 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	
			

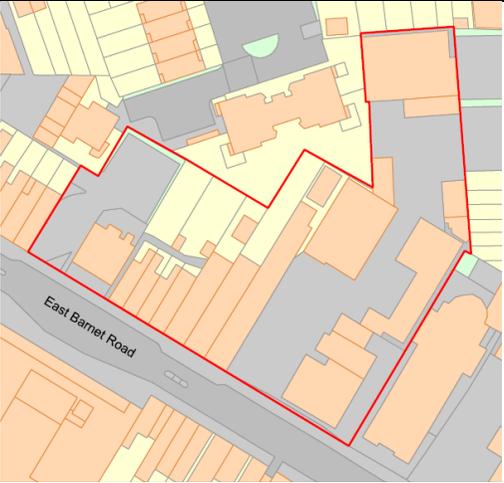
	<p>Relevant planning applications:</p>	<p>19/4661/FUL (approved) 1,309 residential units and commercial uses.</p>	
	<p>Site description:</p>	<p>A single-storey out-of-centre supermarket with associated surface car parking and a petrol filling station. The western boundary of the site lies on the busy 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>			

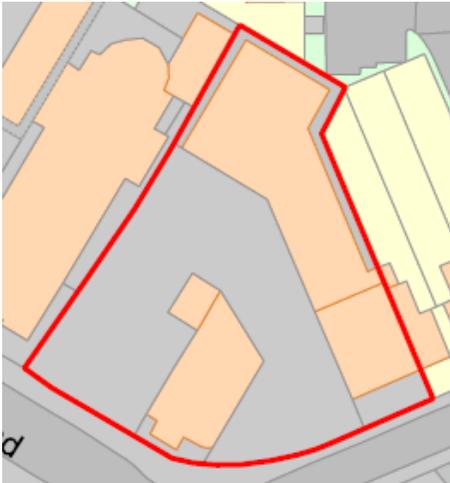
Site No.17	This site has been removed due to it being unlikely to come forward for redevelopment during the Local Plan period. The site number is being retained to provide consistency of site numbering between the Plan versions.
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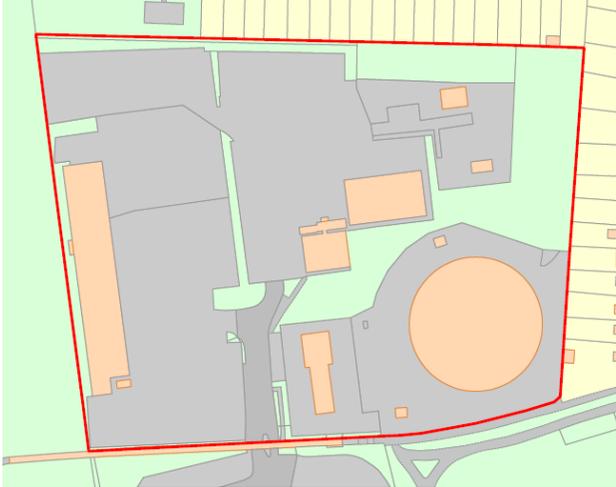
Site No. 18	Former East Barnet library	
Site Address:	85 Brookhill Rd, New Barnet EN4 8SG	
	Ward:	East Barnet
	PTAL 2019:	2
	PTAL 2031:	2
	Site Size:	0.16 ha
	Ownership:	Council
	Site source:	Council assets disposal programme
	Context type:	Urban
	Existing or most recent site use/s:	Public library and associated car park
	Development timeframe:	0-5 years
	Relevant planning applications:	20/4546/FUL (approved) temporary change of use to storage/ distribution
Site description:	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. 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.	
	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	

	Existing or most recent site use/s:	Shooting range	
Development timeframe:	11-15 years		
Planning designations:	None		
Relevant planning applications:	None		
	Site description:	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.	
	Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU04, CDH01, CDH02, CHW01, TOW01, CHW01, CHW02, TRC01, TRC03	
	Proposed uses/ allocation (as a proportion of floorspace):	Residential	
	Indicative residential capacity:	43	
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:	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.		

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	

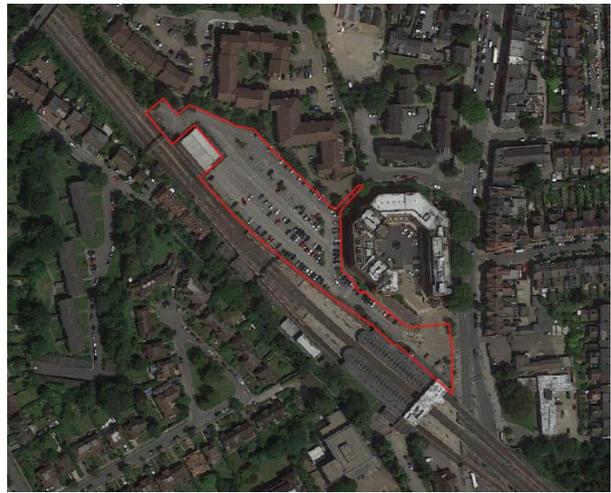
	Justification:	The site is highlighted within the New Barnet Town Centre Framework (2010) and presents a redundant industrial use within a residential area that is within walking distance of East Barnet Town Centre with its shopping, services and public transport connections.
Site requirements and development 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, ECY03, 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.		
				

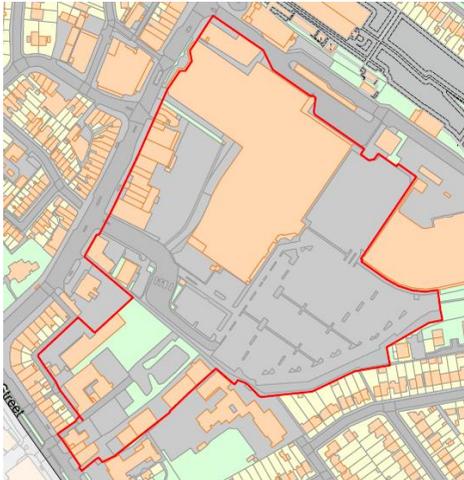
Site requirements and development guidelines:	Site layout will be important due to surrounding residential and transport uses, along with the Grade II listed station building. It might be advantageous to separate the needs of the station users from residents and visitors accessing the residential units. 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																								
	<table border="1"> <tr><td>Ward:</td><td>Garden Suburb</td></tr> <tr><td>PTAL 2019:</td><td>4</td></tr> <tr><td>PTAL 2031:</td><td>4</td></tr> <tr><td>Site Size:</td><td>0.19 ha</td></tr> <tr><td>Ownership:</td><td>Public (TfL)</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>Vacant (former substation for Northern Line)</td></tr> <tr><td>Development timeframe:</td><td>11-15 years</td></tr> <tr><td>Planning designations:</td><td>None</td></tr> <tr><td>Relevant planning applications:</td><td>None</td></tr> </table>	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		
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		
			

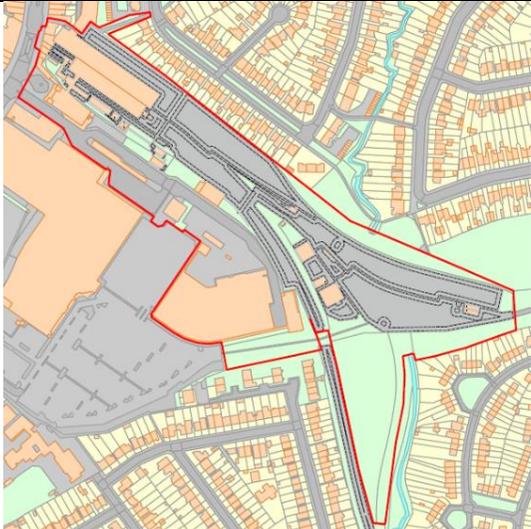
	<p>Site description:</p> <p>The site is within East Finchley Town Centre and consists of two storey buildings with outdoor amenity and parking spaces. The building is set back from the road and to the front is an area of green with mature trees. The building is in use as a childcare facility. The Grade 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		
	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:	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.	



	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>		

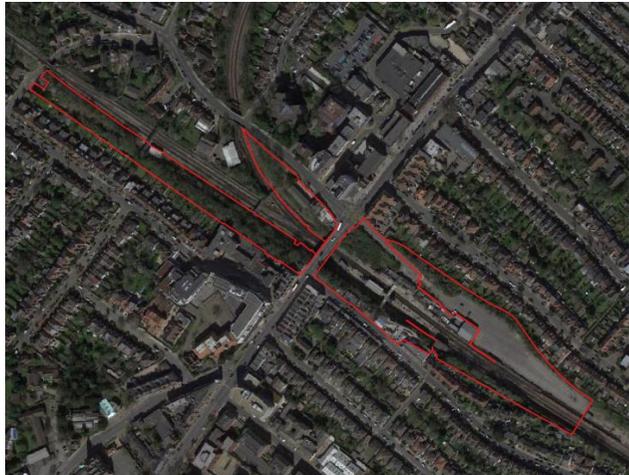
Site No. 28	Edgware Underground & Bus Stations (Edgware Growth Area)		
Site Address:	Station Rd, Edgware, HA8 7AW		
	Ward:	Edgware	
	PTAL 2019:	6B	
	PTAL 2031:	6B	
	Site Size:	8.17 ha	
	Ownership:	TfL	

	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		

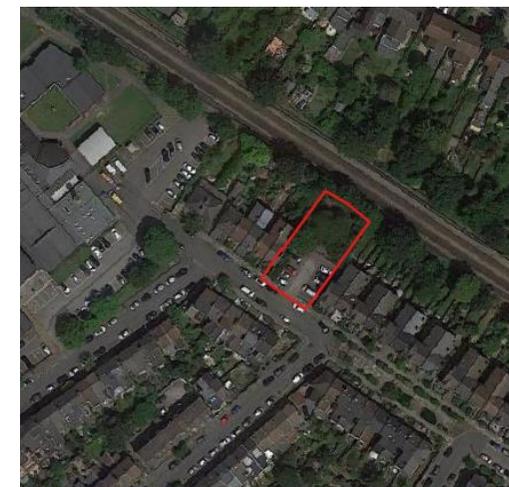
	Site description:	<p>Comprises land at Finchley Central station located either side of Regents Park Road (A598) and either side of the railway tracks. The site extends beyond the town centre and includes Secondary Frontage at Station Road. Site uses include the station and car park, retail and office 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>
	Applicable Draft Local Plan policies:	GSS01, GSS08, GSS12, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, CDH08, TOW01, TOW02, TOW03, CHW02, TOW04, ECY01, ECY02, ECY03, ECC02, TRC01, TRC02, TRC03
	Proposed uses/ allocation (as a proportion of floorspace):	50% residential uses with 50% retained transport infrastructure, commercial uses and car parking
	Indicative residential capacity:	556
	Justification:	The site is a highly accessible town centre location that offers considerable potential for intensification.

<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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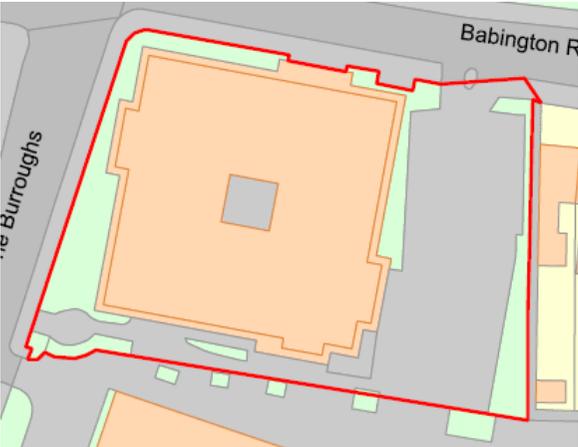
Site No. 34	Burroughs Gardens Car park (Middlesex University and The Burroughs)		
Site Address:	The Burroughs, Hendon, NW4 4AU		
	Ward:	Hendon	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.06 ha	
	Ownership:	Council	
	Site source:	Emerging Burroughs and Middlesex University SPD	
	Context type:	Urban	
	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			
		<p>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.</p>		
		<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, HOU01, HOU02, HOU04, CDH01, CDH02, CDH03, CDH08, CHW01, CHW02, TRC01, TRC03</p>	
		<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>90% residential (halls of residence) floorspace with 10% educational uses</p>	
		<p>Indicative residential capacity:</p>	<p>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)</p>	
		<p>Justification:</p>	<p>Greater use can be made of this well-located site to provide accommodation and for educational purposes.</p>	

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																								
	<table border="1"> <tr><td>Ward:</td><td>Hendon</td></tr> <tr><td>PTAL 2019:</td><td>3</td></tr> <tr><td>PTAL 2031:</td><td>4</td></tr> <tr><td>Site Size:</td><td>0.36 ha</td></tr> <tr><td>Ownership:</td><td>Council</td></tr> <tr><td>Site source:</td><td>Emerging Burroughs and Middlesex University SPD</td></tr> <tr><td>Context type:</td><td>Urban</td></tr> <tr><td>Existing or most recent site use/s:</td><td>Community meeting facility</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>	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		
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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												
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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.																
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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.	
			

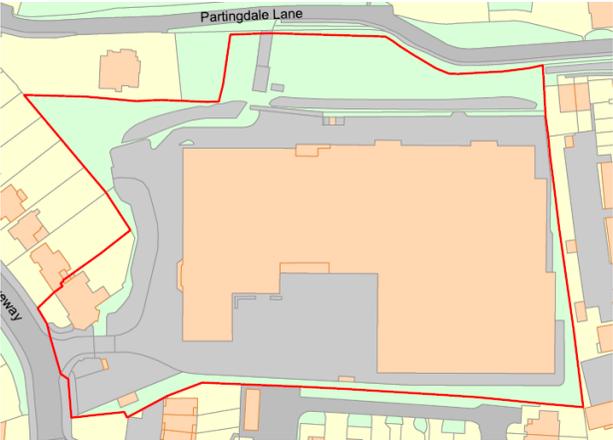
Site requirements and development guidelines:	New residential development with potential for commercial, business and services use elements will strengthen the vitality and viability of the town centre. This is an opportunity to provide family housing in an accessible location. The design should reflect 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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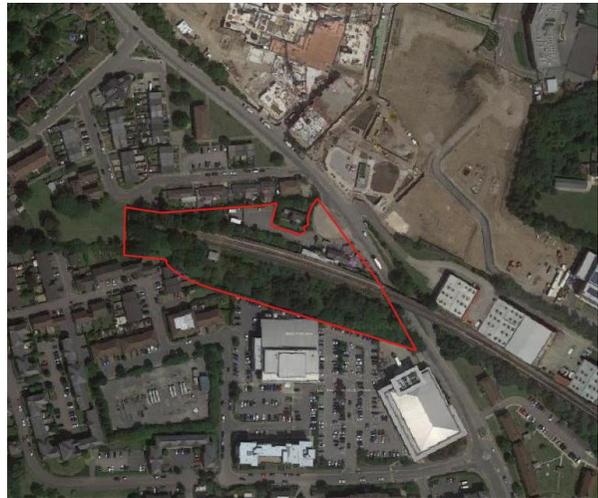
Site No. 44	High Barnet Station (Chipping Barnet Town Centre)		
Site Address:	Great North Rd, Chipping Barnet, EN5 5P		
	Ward:	High Barnet	
	PTAL 2019:	6	
	PTAL 2031:	6	
	Site Size:	1.50 ha	
	Ownership:	Public (TfL)	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	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.	

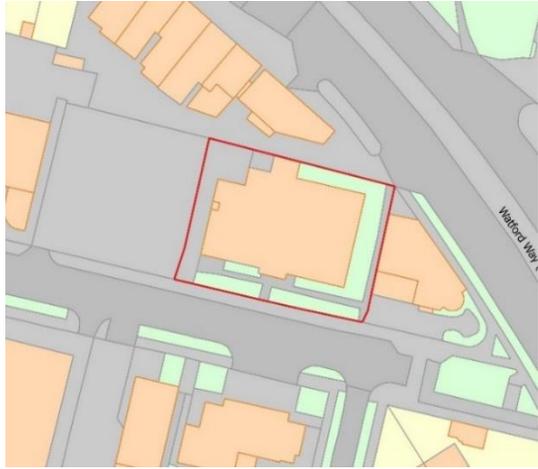
Site No. 45	Land at Whalebones		
Site Address:	Wood St, Chipping Barnet, EN5 4BZ		
	Ward:	High Barnet	
	PTAL 2019:	2	
	PTAL 2031:	2	
	Site Size:	2.20 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Suburban	
	Existing or most recent site use/s:	Agriculture, community facilities	

	<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.																
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<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																								
	<table border="1"> <tr><td>Ward:</td><td>Mill Hill</td></tr> <tr><td>PTAL 2019:</td><td>1B</td></tr> <tr><td>PTAL 2031:</td><td>1B</td></tr> <tr><td>Site Size:</td><td>2.08 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>Suburban</td></tr> <tr><td>Existing or most recent site use/s:</td><td>Office / light industrial / storage and distribution</td></tr> <tr><td>Development timeframe:</td><td>0-5 years</td></tr> <tr><td>Planning designations:</td><td>Green Belt (on part of the site)</td></tr> <tr><td>Relevant planning applications:</td><td>19/6551/FUL 197 residential units; 18/1998/PNO (refused)</td></tr> </table>	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)		
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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.																								

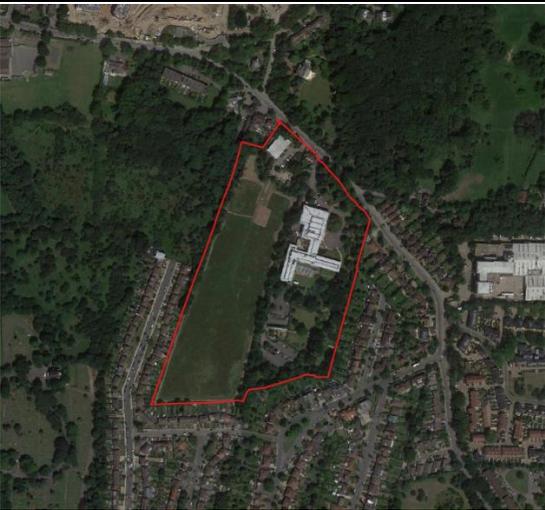
Site No. 47	Mill Hill East Station (Mill Hill East Growth Area)			
Site Address:	Bittacy Hill, Mill Hill, NW7 1BS – airspace above and land adjoining station			
	Ward:	Mill Hill		
	PTAL 2019:	3		
	PTAL 2031:	3		
	Site Size:	1.24 ha		
	Ownership:	Public (non-Council)		
	Site source:	Call for sites		
	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>	

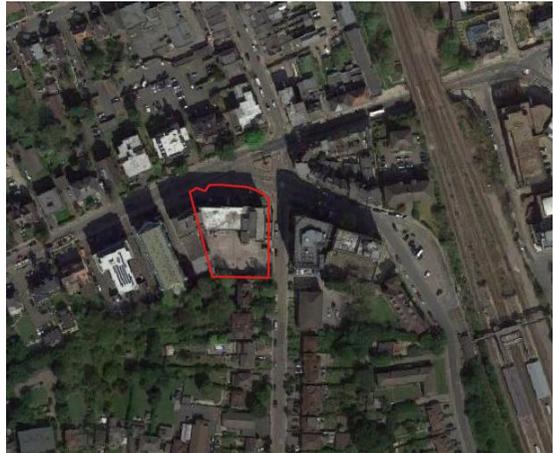
Site requirements and development guidelines:	The quantum and design of redevelopment are significantly constrained by numerous factors, including the low level of public transport access, the suburban semi-rural character, the Green Belt and Conservation Area status, the very prominent position at the 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	

	<p>Planning designations:</p>	<p>None</p>	
	<p>Relevant planning applications:</p>	<p>None</p>	
	<p>Site description:</p>	<p>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.</p>	
	<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH08, TOW01, TOW04, CHW02, CHW04, TRC01, TRC03</p>	
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>40% residential floorspace with 60% of floorspace in use as a cinema and public house</p>	
	<p>Indicative residential capacity:</p>	<p>84</p>	
	<p>Justification:</p>	<p>The site is accessible and presents an opportunity for intensification while seeking to maintain the existing important uses.</p>	
<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>																						
	<table border="1"> <tr> <td>Ward:</td> <td>Totteridge</td> </tr> <tr> <td>PTAL 2019:</td> <td>4</td> </tr> <tr> <td>PTAL 2031:</td> <td>4</td> </tr> <tr> <td>Site Size:</td> <td>4.27 ha</td> </tr> <tr> <td>Ownership:</td> <td>Mixed (TfL and private)</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>Railway station with car parking, industry and storage</td> </tr> <tr> <td>Development timeframe:</td> <td>10-15 years</td> </tr> <tr> <td>Planning designations:</td> <td>None</td> </tr> </table>	Ward:	Totteridge	PTAL 2019:	4	PTAL 2031:	4	Site Size:	4.27 ha	Ownership:	Mixed (TfL and private)	Site source:	Call for sites	Context type:	Urban	Existing or most recent site use/s:	Railway station with car parking, industry and storage	Development timeframe:	10-15 years	Planning designations:	None		
Ward:	Totteridge																						
PTAL 2019:	4																						
PTAL 2031:	4																						
Site Size:	4.27 ha																						
Ownership:	Mixed (TfL and private)																						
Site source:	Call for sites																						
Context type:	Urban																						
Existing or most recent site use/s:	Railway station with car parking, industry and storage																						
Development timeframe:	10-15 years																						
Planning designations:	None																						

	<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>	

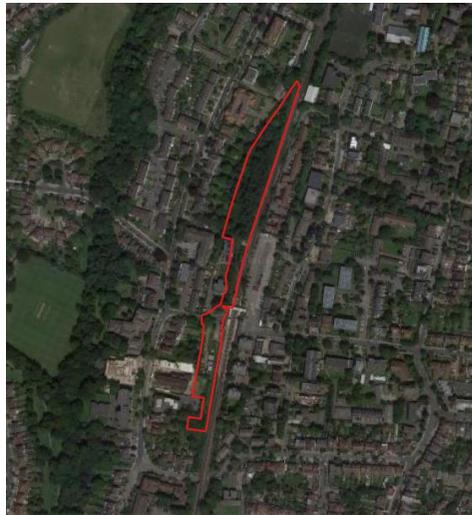
Site requirements and development guidelines:	<p>A portion of the site should be safeguarded for TfL / London Underground for operational purposes, to serve a future Northern Line upgrade. Station functions must be maintained. Good access to public transport and town centre functions support intensification.. 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="853 691 1003 775">Site description:</td> <td colspan="2" data-bbox="1003 691 2056 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 866">Applicable Draft Local Plan policies:</td> <td colspan="2" data-bbox="1133 791 2056 866">GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, CHW01, CHW02, ECY01, ECY02, ECY03, TRC01, TRC03</td> </tr> <tr> <td data-bbox="853 882 1227 935">Proposed uses/ allocation (as a proportion of floorspace):</td> <td colspan="2" data-bbox="1227 882 2056 935">90% residential uses with 10% community and commercial</td> </tr> <tr> <td data-bbox="853 951 1227 1003">Indicative residential capacity:</td> <td colspan="2" data-bbox="1227 951 2056 1003">139</td> </tr> <tr> <td data-bbox="853 1019 1133 1054">Justification:</td> <td colspan="2" data-bbox="1133 1019 2056 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		
			

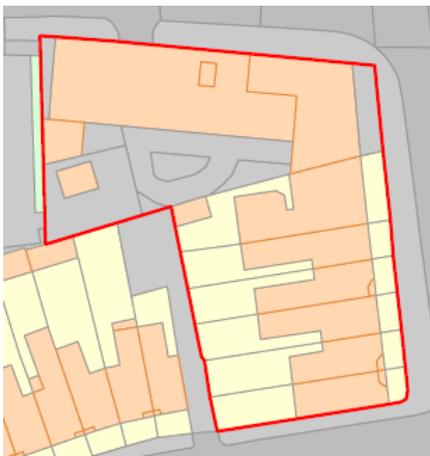
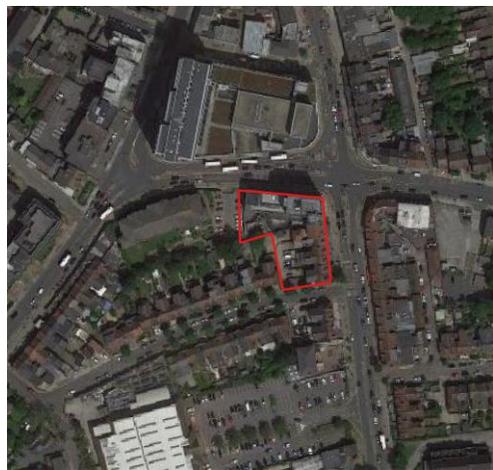
	Site description: The site is within North Finchley Town Centre and fronts onto Ballards Lane. The 4-5 storey buildings are set back from the highway boundary with car parking to the front and rear and are largely in office use. Opposite is the Tally Ho Triangle site, which includes the Arts Depot and 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>		

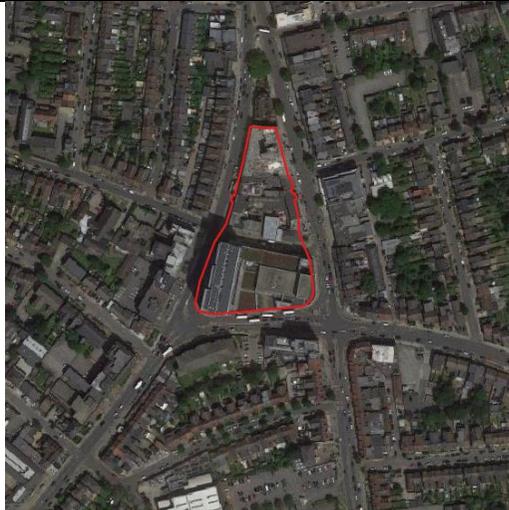
Site No. 59	Central House (Finchley Central Town Centre)			
Site Address:	1 Ballards Lane, Finchley N3 1UX			
	Ward:	West Finchley		
	PTAL 2019:	5		
	PTAL 2031:	6		
	Site Size:	0.15 ha		
	Ownership:	Private		
	Site source:	Call for sites, Finchley Church End Town Centre Strategy		
	Context type:	Central		
	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:</p>	<p>Town Centre</p>	
<p>Relevant planning applications:</p>	<p>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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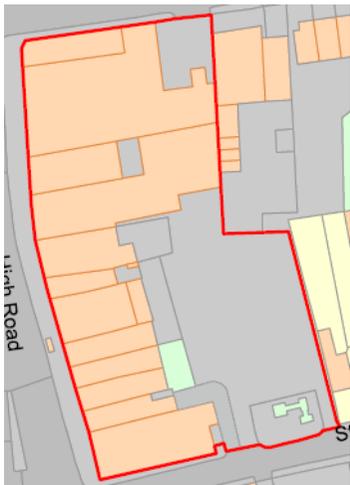
Site No. 62	Tesco Finchley (Finchley Central Town Centre)		
Site Address:	21-29 Ballard's Lane, Finchley, N3 1XP		
	Ward:	West Finchley	
	PTAL 2019:	4	
	PTAL 2031:	5	
	Site Size:	0.85 ha	
	Ownership:	Private	
	Site source:	Finchley Church End Town Centre Strategy	
	Context type:	Urban	
	Existing or most 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, EGY01, EGY02, EGY03, 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>																

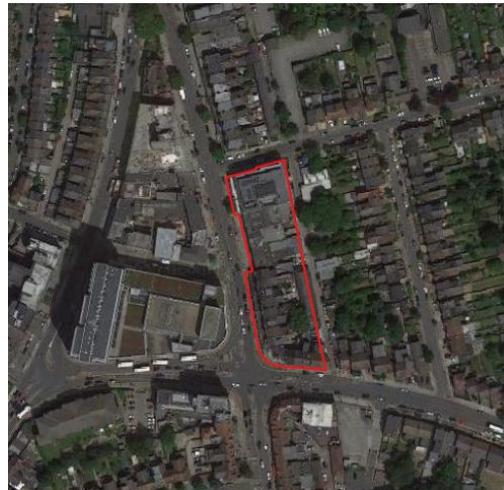
<p>Site No. 64</p>	<p>744-776 High Rd (North Finchley Town Centre)</p>
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Site Address:		744-776 High Rd, North Finchley, N12 9QG		
	Ward:	Woodhouse		
	PTAL 2019:	4		
	PTAL 2031:	4		
	Site Size:	0.54 ha		
	Ownership:	Mixed Council and private		
	Site 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		

	<p>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.</p>
	<p>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</p>
	<p>Proposed uses/ allocation (as a proportion of floorspace): 70% residential floorspace with 30% town centre commercial and cultural uses</p>
	<p>Indicative residential capacity: 125</p>
	<p>Justification: This accessible town centre site was identified for intensification in the North Finchley SPD.</p>
<p>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.</p>	

<p>Site No. 67</p>	<p>Great North Leisure Park (Major Thoroughfare)</p>		
<p>Site Address:</p>	<p>High Rd, Friern Barnet, N12 0GL</p>		
	<p>Ward:</p>	<p>Woodhouse</p>	
	<p>PTAL 2019:</p>	<p>1B</p>	
	<p>PTAL 2031:</p>	<p>2</p>	
	<p>Site Size:</p>	<p>3.45 ha</p>	
	<p>Ownership:</p>	<p>Mixed</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>Cinema, bowling, leisure/ sports centre with lido, restaurants and extensive car parking</p>	

	<p>Development timeframe: 6-10 years</p> <p>Planning designations: None</p> <p>Relevant planning applications: None</p>		
	<p>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.</p>		
	<p>Applicable Draft Local Plan policies:</p>	<p>GSS01, GSS11, HOU01, HOU02, CDH01, CDH02, CDH03, CDH07, CHW01 CHW02, ECC05, ECC06, TRC01, TRC03</p>	
	<p>Proposed uses/ allocation (as a proportion of floorspace):</p>	<p>60% residential floorspace with 40% commercial, leisure and community uses</p>	
	<p>Indicative residential capacity:</p>	<p>352</p>	
	<p>Justification:</p>	<p>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>	
<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 - Barnet's Local Plan – Schedule of Representations on Publication Regulation 19 Town & Country Planning (Local Planning) (England) Regulations (Reg 19)

Representor	Section	Summary of Comments
Mill Hill Preservation Society	Introduction :	We have compared the latest Draft Local Plan Reg.19 with the original comments we made in our response 5th March 2020 against V.18 of the plan. Where the point raised in the original letter is considered to be of no further relevance it has been omitted in this document. It is understood that in responding to a Reg. 19 Draft Local Plan it is a requirement to ascertain whether the Plan is 'Sound', and in order to be considered as sound the Plan must be positively prepared, justified, effective and consistent with national planning policy. At this time, the Society considers that the Plan cannot be sound, but that changes can be made to enable it to be made sound.
Hammerson UK Prop and Aberdeen Standard Investments	Para 1.3.3	Para 1.3.3 of the draft Local Plan confirms that Brent Cross Cricklewood continues to be identified as an Opportunity Area. The draft Local Plan sub-divides the Opportunity Area into three Growth Areas, namely: Brent Cross; ▪ Brent Cross West/Staples Corner; and Cricklewood Town Centre. H/ASI are supportive of the proposed sub-divisions which enable the differences that occur across each area to be recognised in policy terms.
Barnet Green Spaces Network	Chapter 2	Responding to the Nation wide and city declaration of Climate Announcement – consciously producing a plan ahead of COP26 in the UK – a clear ambitious declaration of the UK's desire to lead the way in mitigating Climate Change. The ambition should be to lift Barnet from being one of the greenest to it being recognised, awarded and rewarded for being London/ UK's leading green borough. This should be achieved by setting 5-10 bold targets and across a range of the priority issues. See suggested language in RED to insert into the document: 'Barnet aims to become a nationally/ globally recognised exemplar of how to achieve sustainable growth/ a sustainable future whilst achieving transformative response to the climate emergency. Maintaining the quality of the environment whilst delivering the levels of forecast growth is a key challenge for Barnet. Green growth will mean healthier happier lives for all residents and attract more investment and support to the borough, as well as enable the borough to be resilient and more efficient in face of future challenges 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. Publication 19 June 2021 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. The borough will aim to become one of the first London boroughs to become carbon neutral by the end of this planning cycle – 2030. With the aim of achieving 75% reductions by 2030/ Global Goal target. To make Barnet carbon neutral by 2050 the Council is progressing a Transformational 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. 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.
Barnet Cycling Campaign	Chapter 2	The Local Plan should represent a significant opportunity to improve active travel in Barnet. We comment on the most relevant chapters and policies to show this needs to be prioritised. We responded to the Reg 18 Local Plan in 2020 and this response retains those comments, where relevant. Since then, the borough published its Long Term transport strategy and we have all endured the pandemic, which will have unknown long term outcomes on the borough. Both of these influence our new comments. The Local Plan refers to the impact of the Pandemic and identifies a clear benefit opportunity of the 15 Minute Neighbourhood. [2.1.4]. Prioritising sustainable Active Travel through walking is essential for this. However Cycling is omitted from the section which is curious as the leading "15 minute cities " in the world – Paris, Amsterdam, Copenhagen – all achieve this through enabling cycling. The type of cycling that thrives in these cities is accessible to all ages and abilities. Sometimes, this is called "8-80 cycling" in reference to age, but it is also notable that these are also cities where women cycle more than men, school children cycle themselves to school, and people cycle well into old age. Mobility scooters tricycles and handcycles are a common sight on the paths too. Why can't this apply to Barnet? It's not the hills and it's not the rain. Study after study has shown that the main impediment to mass-cycling is the lack of infrastructure to keep cyclists safe from motor vehicles. Of course, e-bikes offer significant benefit and it's

Representor	Section	Summary of Comments
		<p>worth remembering that e-bikes already outsell electric cars in the UK1i and are predicted to be half of all bike sales by 2025ii. A 15-minute bike ride on safe, direct route would cover 2-5 miles, depending on age and ability which puts every citizen within reach of local parks, town centres and schools. It would mean quiet, zero-emission last-mile deliveries by cargo bikes rather than vans. A 15-minute borough would mean residents could stay active and healthy later in life, maintaining independence for longer. Central to the 15-minute borough is the concept that more people can chose to walk or cycle to their local amenities rather than drive. This is 'modal shift' and it has already been achieved in many other London boroughs. It has revitalised local high streets, improved air quality and reduced noise pollution. The Good Growth concept in the local plan should recognise that delivering a 15-minute city means fewer car journeys, especially unnecessary ones over short distances [which frees up previous road capacity for those with genuine needs]. This can be achieved through the local plan in several ways:</p> <ul style="list-style-type: none"> - Removing Car Dependency via the Planning Process [as hinted in the Good Grown concept [2.2.1] - Using the IDP to deliver a network of safe cycling routes adhering to LTN1/20 guidelines for Cycle Infrastructure Design. This must include sufficient provision for secure cycle-storage at-destination and for residents without storage space in their homes. - Low-cost measures such as traffic filtering, 20mph zones and pedestrian prioritisation to facilitate more walking and cycling. Based on the Healthy Streets Scorecard. Even basic measures such as pavement quality, continuous footways, high street clutter and pedestrian crossing timings can have a major impact on the experience of pedestrians. School streets and 20 mph limits improve safety and encourage parents and children to use active transport to school which has a major health and social benefit. The school run is 1/5th of rush hour traffic. - Parking charges and road pricing to dissuade unnecessary journeys. It works in cities where it has been introduced including London, with the congestion charge. We need to make it clearer to people that if you drive your car unnecessarily you need to pay a bit more. 1/3rd of London car journeys are under 2km. Reducing this traffic would improve public transport speed. <p>Failure to deliver this will mean Barnet will grind to a halt. This is already happening as traffic exceeds pre-pandemic levels as people shy away from public transport as they lack viable alternatives.</p> <p>This cannot be achieved without some honesty with people that it would mean fewer journeys by car – but this is a large part of the benefits and appeal. Despite some manufactured outcry from various critics, Low Traffic Neighbourhoodsiii (LTNs) have been shown to work and are popular with residents once correctly implemented.</p> <p>Barnet already has several historic or de-facto LTNs where through traffic is restricted and no one ever proposes removing those. In fact, every Local Area Forum and most e-petitions to the council are for traffic calming, road safety and more parking restrictions. Residents are fed up with their roads being used by drivers as rat runs.</p>
LB Brent	Section 2.6	<p>The council is supportive of the approach to the enhancement and restoration of the Brent Reservoir in Policy GSS02. It understands the challenges and the opportunities blue infrastructure can present. For consistency, it will be helpful to recognise the river tributaries (Welsh Harp/Brent Reservoir) at the beginning of the Plan in Chapter 2 Opportunities and Challenges under environment section.</p>
Mill Hill Preservation Society	Section 2.8	<p>Clause 2.8 Transport: Appropriate assessments need to be undertaken to ensure parking standards are reflective of the impact that parking is having on areas such as Mill Hill/Mill Hill East, as opposed to a blanket policy advocated within the London Plan. (see accompanying letter) 2.8.4The Plan accepts that the car is the dominant mode of transport in outer London, and Barnet has long been associated with a high level of car ownership. Within the lifetime of the Plan, realistically, there will be little change in this reality. Whilst the Local Plan needs to support active travel and public transport opportunities it also needs to provide for adequate parking standards to meet the requirements of residents - 70% of whom live in residences with motor vehicles. Recent developments within the area have exacerbated on-street parking within the Conservation Area to the extent that it is undermining the character and appearance of the area and directly impacting on the safe and free flow of traffic. Due to the strategic nature of the Transport Assessment this consequential impact is not considered. The Mill Hill Conservation Area Appraisal 2008 noted the impact that development and traffic was having on the value of the heritage asset. Since this appraisal was undertaken, this situation has only been exacerbated. Appropriate assessments should be undertaken to ensure parking standards are reflective of the impact that parking is having on areas such as Mill Hill/Mill Hill East, as opposed to a blanket policy as advocated within the London Plan. Clause 2.8: include for assessments to ensure local parking needs are met rather than applying a blanket policy advocated in the London Plan.</p>
Brent Cross South Limited Partnership ('BXS LP'),	Para 2.4.1	<p>To reflect para. 5.17 of the Draft Plan, the contribution of BtR development to meeting Barnet's housing needs should be specifically recognised here. The following wording is suggested: <i>It will support opportunities for tenure diversity when it can bring development forward quicker and will support Build to Rent development in appropriate locations. It may also consider precision manufactured housing on long term regeneration sites as an appropriate option in addressing Barnet's housing needs.</i></p>

Representor	Section	Summary of Comments
Finchley Society	Para 2.4.2	This para fails to recognise that if Barnet's housing needs are to be met the whole planning process must be acceptable to the community. Early and meaningful consultation of the community is essential if the planning system is to run smoothly and be acceptable to the citizenry. Lengthy confidential negotiations between officers and applicants, followed by refusals by councillors and expensive long-drawn out appeals, are to no-one's benefit (except perhaps lawyers.) Para 2.4.2 should include a sentence committing the council to consult openly and at the earliest opportunity on all major planning proposals of which it is aware. Such a commitment would be in harmony with the Government's emerging ideas for the reform of the planning system. Because full examination of this essential aspect of the planning system is necessary, and I have recent experience of the problems stemming from unsatisfactory consultation.
LB Brent	para 2.5.1	For consistency and to be in general conformity with the London Plan, the town centre hierarchy should use consistent terminology as that set out in the London Plan town centre hierarchy. Proposed modification: ' <i>Barnet's town centre hierarchy provides a strong, distinctive feature for the Borough economy. The variety of centres (regional, metropolitan, major, district and local) across the Borough...</i> '
Barnet Cycling Campaign	Chapter 3	The vision statements need an additional para 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.
Sanjay Maraj	Chapter 3	<ol style="list-style-type: none"> 1. The objectives (3.2.2) do not have any form of measure. Without a metric it is impossible to understand how progress is being made, and how effective the plan, policies and downstream activities. 2. Table 2 Objectives and supporting policies – CDH01 and CDH08 have not been referenced as relevant to three objectives <ol style="list-style-type: none"> a. To deliver growth to housing aspirations and needs b. To improve the quality and type of housing c. To ensure new developments are high quality and sustainable 3. Policy BSS01 – Barnet Spatial Strategy. No reference has been made to the Hackitt enquiry, and the imminent introduction of a new Building Safety bill. <ol style="list-style-type: none"> 1- As the strategy evolves, suggest measures are included for each objective. It would also be good to have some form of baseline for each objective, from which progress can be measured. This will help the council demonstrate the strategy is being effective, and would help the community understand what difference is being made. 2- Include CDH01 and CDH08 as referenced policies to three objectives: <ol style="list-style-type: none"> a. To deliver growth to housing aspirations and needs b. To improve the quality and type of housing c. To ensure new developments are high quality and sustainable 3- Policy BSS01 – Barnet Spatial Strategy. Include reference to the Hackitt enquiry, and the imminent introduction of a new Building Safety bill, and use the strategy to position Barnet as going above and beyond the minimum to protect the safety of the people that live and work in the borough. Safety needs to be more prominent wherever there are references to development
Environment Agency	Vision	We support the changes that have been made to the vision, as it is now clear there is some ambition to improve the natural environment. This achieves a better balance between economic, social and environmental objectives in line with paras 8(c) and 149 of the NPPF. We think therefore the vision is sound being more consistent with the NPPF policies, more positively prepared and justified. However, we have recommended some very minor changes to improve this by (a) bringing the issue of climate change to the forefront of what the Borough is trying to achieve in line with aims of para 149 of the NPPF and (b) acknowledge that water quality needs to be improved in line with para 170 (e) of the NPPF. We acknowledge with 'water quality' that restoring the Borough's rivers is referenced, but water quality is a much broader issue than that encompassing the need to protect both the Borough's surface water and groundwater from contaminated land and pollutants. Minor changes we suggest are as follows to strengthen and improve the vision include: 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. At the same time we will build our resilience to climate change and improve water quality.
TFL (Commercial Development)	Vision	TfL CD continues to support the proposed 'vision' and, in particular, directing growth to the most sustainable locations with good public transport and sustainable transport choices. In particular we support the added references to good, sustainable growth. However, we would still suggest adding specific references to good design , which is important to ensuring the Barnet continues to be " <i>a place where people choose to make their home</i> ". References to

Representor	Section	Summary of Comments
		good design should also be included in para 3.2.2 which sets out key objectives linked to the vision; this would reflect updated para 8 of the new NPPF which highlights the importance of “ <i>well designed, beautiful and safe places</i> ” to achieving sustainable development. This could potentially be incorporated within the last bullet point of para 3.2.2..
Barnet Climate Action Group	Vision	In the challenges identified, the Barnet Draft Local Plan does not highlight the key issue of climate change in a detailed manner. It highlights the London Plan’s aspirations on zero carbon but does not identify the challenges of reducing carbon emissions from across the borough or the threat that climate changes poses to communities and infrastructure. BCAG believe that the reason for this is that, unlike the majority of other London boroughs, Barnet has no climate plan in place, and no joined up strategy in relation to reducing carbon emissions across the borough. This is probably also the reason why the ‘Local Plan Key Facts Evidence Paper’ has no reference to the impacts of climate change and there was no research commissioned by the council as part of the Local Plan work on the impacts of new development on the borough’s carbon emissions. In a similar vein, the lack of a climate plan for the borough has likely contributed to the fact that climate change is not one of the five cross cutting themes for the Local Plan, which is a lost opportunity to embed climate, sustainability and low carbon across all aspects of the Local Plan. The key objectives are largely supported, but while resilience and adaptation to climate change is highlighted, reducing carbon emissions again is not. While the Vision includes getting the best out of our natural environment and improving orbital connectivity in order to improve sustainable transport, it does not speak to reducing carbon emissions or present a vision for a net zero Barnet in 2050. This is disappointing as it is clear that the Government is making the issue of the UK tackling climate change as a key issue of both national and international leadership and BCAG would expect the council to rise to this challenge in the Local Plan.
Environment Agency	Vision	We support the changes that have been made to the vision, as it is now clear there is some ambition to improve the natural environment. This achieves a better balance between economic, social and environmental objectives in line with paras 8(c) and 149 of the NPPF. We think therefore the vision is sound being more consistent with the NPPF policies, more positively prepared and justified. However, we have recommended some very minor changes to improve this by (a) bringing the issue of climate change to the forefront of what the Borough is trying to achieve in line with aims of para 149 of the NPPF and (b) acknowledge that water quality needs to be improved in line with para 170 (e) of the NPPF. We acknowledge with ‘water quality’ that restoring the Borough’s rivers is referenced, but water quality is a much broader issue than that encompassing the need to protect both the Borough’s surface water and groundwater from contaminated land and pollutants. Minor changes we suggest are as follows to strengthen and improve the vision include: <i>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. At the same time we will build our resilience to climate change and improve water quality.</i>
Barnet Green Spaces Network	Vision	Taking into account the challenges highlighted in Chapter 2 the Local Plan Vision is: By 2036 Barnet has transformed into a dynamic globally/ nationally recognised borough where residents and business thrive in a greener, healthier and more dynamic environment of opportunity. By putting the climate emergency at the heart of our growth, Barnet will not only ensure a sustainable future for the borough but also create by 2036 one of the most, well planned sustainable and climate friendly boroughs and demonstrate how that growth can be delivered. The Borough aims to become the most family friendly borough, 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. Championing our natural environment at all times Getting the best out of our natural environment through expanding and improving access to green and blue infrastructure, delivering biodiversity net gain, rewilding and restoring the Borough’s rivers to the benefit of people and wildlife whilst protecting our communities from flooding and future climate unpredictability. 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. Encourage Community buy in /engagement with this work – overall the sustainability/ greening policies <u>should be included in Section 8 – Community Health And Wellbeing</u> linked to https://www.nationalparkcity.london/ aims for healthier, greener, wilder city for people to live in Targets for schools and business groups to be represented Should also be included in section 9 / Economy – space for green jobs – putting sustainability front and centre including rewilding should bring new green jobs as well as provide a better working environment

Representor	Section	Summary of Comments
Haringey Council	Vision	Haringey broadly supports the Draft Local Plan (Reg 19) vision which is that by 2036 Barnet has successfully demonstrated the benefits that good, well planned growth can deliver. We note the ten objectives which have been developed for the Plan and which underpin all of its policies, including to respond and recover from COVID19.
Finchley Society	Para 3.2.2	'aspirations and needs' in the second bullet point is the wrong phrase:- 'aspirations' could be infinite - we might all aspire to a mansion - while some calculations produce a high figure for so-called housing "need" throughout London. replace 'aspirations and needs' by 'requirements'
Lodge Lane N12 Resident's Association	Para 3.3.1	National/London-wide/Barnet housing need projections are all based on estimates done before Brexit and COVID-19. Evidence such as the PWC estimate of a 300,000 reduction in London population in 2021 (https://www.theguardian.com/uk-news/2021/jan/07/london-population-decline-first-time-since-1988-report-covid-home-working) suggests that future objectively-assessed housing need will be far less than is currently estimated. The Local Plan needs to recognise this and provide a mechanism for revising housing need without a complete re-publication of the Plan. Otherwise, unnecessary and unwanted homes will blight the borough.
Lodge Lane N12 Resident's Association	Para 3.3.1	Text along the lines of: "It is recognised that the impacts of Brexit and COVID-19 on housing need, although currently unquantified, will be significant. The Authorities Monitoring Report (AMR) provides continuing review and monitoring of the Council's housing targets and its performance against them. The AMR will reflect changes to needs as they emerge from national and local studies, and will result in appropriate amendments to housing targets in the appropriate documents such as the Growth Strategy Delivery Plan." The impact of future changes in housing need should be reflected elsewhere in the plan where definitive numbers are given which may need to change – chiefly section 5 and the various specific growth area policies – by reference to the overarching strategic policy BSS01.
Home Builders Federation	BSS01	Part a) i. is unsound because it is ineffective. The draft policy Part a) i) states that the local plan will seek to deliver between 2021 and 2036: i. A minimum of 35,460 new homes, including the provision of affordable housing to meet Policy HOU01. We note para 3.3.1 of the Local Plan. This observes that over the Plan period to 2036, the Council will seek 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 over 15 years. HBF supports this Local Plan objective as it accords with the new London Plan. The new London Plan sets an annual housing requirement for ten years 2019/20 to 2028/29 of 23,640 net additional homes (see London Plan Policy H1). This equates to an annual average of 2,364 homes. As Barnet's Local Plan will commence in 2021 this ten-year target should cover the period 2021-2031. The London Plan assesses in aggregate the housing need across all of London and then sets a housing target for each of the boroughs based upon a judgement about capacity. The Mayor has only been able to set housing requirements for ten years because housing land capacity after 2028/29 is subject to great uncertainty. The Mayor intends to produce a revised London Plan before the termination date of the new London Plan with revised targets and housing requirements. The Barnet Local Plan is doing the correct thing by projecting forward the capacity-constrained figure of 2,364 net additional homes a year to support a 15-year plan, in line with the requirement of the NPPF. The Local Plan should be amended to explain why it is doing this. Barnet will be mindful of the fact that it will need to update its local plan, in line with a new London Plan, to reflect any changes in evidence, and especially evidence relating to the capacity of the borough. We agree that the figure of 2,364 net additional homes a year should be regarded as the minimum number of homes required each year. This is because London as a whole (and London is treated as a single housing market area for planning) is able only to accommodate 52,000 homes a year out of a total need for 66,000. There is, consequently, a shortfall annually of 14,000 homes.
Home Builders Federation	BSS01	Part c) is unsound because the Plan's approach to housing supply does not accord with national and London Plan policy. We appreciate what the Council is attempting to achieve here, but the aim of concentrating development chiefly within the Opportunity Areas and Growth Areas identified may inhibit opportunities for small sites development. With the emphasis in national and London Plan policy to increase supply of housing on small sites (sites of 0.25ha in size in the context of London – see London Plan policy H2) and on increasing active forms of travel). The spatial strategy is unjustified. The Local Plan policy needs to be worded more a bit positively to encourage a greater number of small-scale developments in locations outside of these primary development zones. We welcome the Council's overall stance so that proposals that have careful regard to the historic environment and character will be supported, but we are unsure how the words 'recognised capacity' may be interpreted in planning. It is unclear if this would be the Council's view or the applicants. It is highly likely that both sides will hold very different views on this question. To achieve a more positive prepared local plan, it would be better if the Council identified a number of additional locations outside of the growth locations where smaller-scale developments would be supported, and ideally allocate these, as national and London Plan policy encourages. We note from the Key Diagram that there are very large parts of the borough that are not served by any development zones. This is true of the quadrant bordered by the tube stations Golders Green, East Finchley, Hendon Central, and Mill Hill East. Also, the area west of New Southgate to North Finchley. We cannot believe that there are not any housing development opportunities, especially smaller infill sites, within this large area that could not be identified and allocated by the Plan. The Opportunity and Growth areas also seem very tightly drawn when it is feasible for town centres and key transport hubs to be reached through walking and cycling, as London Plan policy and Policy TRC01 – sustainable and Active Travel of the Barnet local plan encourages. Barnet has many underground stations which people, especially the more able-bodied, could access

Representor	Section	Summary of Comments
		<p>from outside of the Opportunity and Growth areas through walking and cycling. Furthermore, some areas with underground stations are not identified as Opportunity or Growth areas for housing at all. This is despite London Plan policy H1 seeking the following to improve housing supply: 2) <i>optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.</i> Increasing the supply of housing from small sites is a key objective of the new London Plan. We note that Barnet needs to provide 434 homes a year on small sites. We will discuss this in more detail below, but in terms of the spatial strategy and the locations for delivery, the London Plan expects London boroughs to increase the supply of housing on small sites, by, among other things: <i>increasing housing provision in accessible parts of outer London to help address the substantial housing need in these areas and deliver market homes in more affordable price brackets</i> (London Plan, para 4.2.2). Moreover, the GLA SHLAA that provided the supporting evidence for the housing requirements in the new London Plan, assessed the potential for the supply of housing through small sites by looking at factors such as accessibility, capacity and constraints. As the London Plan summarises at para 4.2.3: <i>The targets are based on trends in housing completions on sites of this size and the estimated capacity for net additional housing supply from intensification in existing residential areas, taking into account PTAL, proximity to stations and town centres, and heritage constraints.</i> The areas around the town centres and underground stations are clearly highly accessible locations suitable for more allocations. Figure 4.3 of the London Plan is a diagram that shows areas in proximity to town centres and stations. The Barnet area shows that the Mayor considers that there is much greater potential in Barnet around the town centres and stations than is reflected in the Barnet Local Plan. To exclude many of them is unjustified. The Plan will need to give stronger support for housing in the town centres and near transport hubs. It will need to allocate more housing sites, if possible, in those town centres and near stations. The Plan should also be amended to read: <i>Outside of these locations, a presumption in favour of residential development will operate where: a) the development is within 800m distance of an underground or rail station; and b) the development is within 800m distance of a district, major town centre, or Opportunity or Growth area. When considering such applications the applicant will need to have regard to protecting and enhancing the historic environment and local character.</i></p>
Barnet Cycling Campaign	BSS01	<p>We suggest that the Spatial Strategy for Barnet includes specific references and targets for active travel [Cycling and Walking] as a means to achieve the objectives laid out in B, C and D of the policy.</p>
All Souls College	BSS01	<p>The plan is considered to be unsound as the plan period will not be a minimum of 15 years from adoption as set out in Para 22 of the NPPF. The plan is expected to be adopted in Autumn 2022 according to the Council web-site. A fifteen year plan period from Autumn 2022 would require an extension to the plan period of at least one year. An extended plan period would require a proportionate increase in the stated minimum housing requirement set out in Policy BSS01. The plan period should be extended by at least one year to 2037. The housing requirement set out in Policy BSS01 should be increased to reflect the extended plan period. <u>Would like to participate at the examination hearings:</u> To explain why the plan period should be consistent with advice in Para 22 of the NPPF To explain why the housing requirement should be increased to reflect such a change in the plan period</p>
Landsec	BSS01	<p>Draft Policy BSS01 seeks to deliver a minimum of 35,460 homes over the Plan period (2021-2036). This equates to an annual target of 2,364 homes. Landsec consider it appropriate that the overall housing target is expressed as a minimum, to enable opportunity for further appropriate housing delivery to come forward to support the Mayor of London strategic housing targets, and the Government's ambition to significantly boost the supply of housing as set out in Para 60 of the NPPF (NPPF) (July 2021). It is noted the Regulation 18 version of this draft policy previously set the housing target as a minimum of 42,000 homes. As part of the previous representation, Landsec expressed support for the retention of this target rather than a reduced target to align with the London Plan (at that time also in draft form), as is now included in the Regulation 19 version. It is noted that the Council had an advisory meeting with Inspector Louise Crosby in April 2021 ahead of the Regulation 19 Draft Local Plan being published. The notes of this meeting state the Inspector advised the Council to set its housing requirement to match that handed down by the adopted London Plan (35,460) but keep the supply as presented (closer to 46,000). This use of this approach is set out in Supporting Para 4.4.5 of the Regulation 19 Draft Local Plan. The Inspector references the PGG which states 'where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategic or non-strategic policies'. However, and as acknowledged by the Inspector, the London Plan target is based on capacity rather than need and it is widely accepted that the need is much greater. On this basis, we consider the reintroduction of the 42,000 homes target, which closer aligns with the Borough's Objectively Assessed Need (OAN) as set out in the London Borough of Barnet Strategic Housing Market Assessment Update (SHMA) (October 2018) for 3,060 homes per year (45,900 over the 15-year life of the Plan) would be an appropriate and sound approach, and we request this is taken forward.</p>
Mill Hill Missionaries	BSS01	<p>Policy BSS01 provides an overarching spatial strategy to capture the aspirations for Barnet's preferred approach over the Plan period (2021 to 2036), which includes 35,460 new homes (i.e. 2,364 dwellings per annum), and Table 4 of the Draft Local Plan sets out the Housing Requirement Assessment for the Plan Period (as shown below).</p>

Representor	Section	Summary of Comments																			
		<table border="1" data-bbox="483 134 1171 284"> <thead> <tr> <th data-bbox="483 134 622 217">New Homes for Barnet</th> <th data-bbox="622 134 759 217">MHCLG Standard Methodology 9Dec 2020)</th> <th data-bbox="759 134 896 217">London Plan (March 2021)</th> <th data-bbox="896 134 1032 217">Draft London Plan (Dec 2017)</th> <th data-bbox="1032 134 1171 217">Barnet SHMA (Oct 2018)</th> </tr> </thead> <tbody> <tr> <td data-bbox="483 217 622 240">Per annum</td> <td data-bbox="622 217 759 240">5,361</td> <td data-bbox="759 217 896 240">2,364</td> <td data-bbox="896 217 1032 240">3,134</td> <td data-bbox="1032 217 1171 240">3,080</td> </tr> <tr> <td data-bbox="483 240 622 284">Total 2021 - 2036</td> <td data-bbox="622 240 759 284">80,415</td> <td data-bbox="759 240 896 284">35,460</td> <td data-bbox="896 240 1032 284">47,000</td> <td data-bbox="1032 240 1171 284">46,000</td> </tr> </tbody> </table> <p data-bbox="465 293 2148 847">MHCLG “Standard Method” Requirement (December 2020) Since the Regulation 18 Consultation, the methodology for calculating housing need was revised to 5,361 homes per annum (‘dpa’) in December 2020, which is an uplift from the previous calculation published in February 2019 of 4,126 dpa. Although the Government is currently re-considering the standard method and further details are expected to be published later this year, this figure demonstrates that affordability has worsened within Barnet with the average house price-to-earnings ratio widening .London Plan Requirement Para 3.3.1 of the Draft Local Plan states that the Council will seek to create the conditions in the Borough that will deliver a minimum of 35,460 new homes equal to 2,364 dpa over a 15-year Plan Period (2021-2036). The overall objective of providing 2,364 dpa within the Draft Local Plan accords with the London Plan (Policy H1), however the London Plan sets a 10-year housing target from 2019/20 until 2028/29 therefore Barnet’s housing target should be used for the first 10 years of the Draft Local Plan (i.e. from 2021 until 2031) only. Instead, the Council have rolled forward the London Plan annual rate over the 15-year Plan Period (in line with the requirements of the NPPF) and have not provided reasoning or acknowledged this approach within the Draft Local Plan and supporting text. Whilst we recognise the uncertainty’s on housing land supply capacity from 2028/29, it is intended that a revised London Plan, with revised housing requirements, will be published prior to the termination date of the London Plan. Given the past trends of the housing requirement for Barnet, and the overall shortfall We consider that the housing requirement identified within Policy BSS01 is unsound as it is ineffective. Although we agree with the overall approach taken by the Council to plan for a minimum of 2,364 dpa from 2021-2036, the Draft Local Plan does not address the current shortfall of 14,000 dpa across London (with London being treated as a single housing market area for planning). Therefore, we recommend the minimum housing target is increased. Furthermore, we request that the Council provides further clarity on how they intend to address the housing requirement within years 10-15 of their Plan period, given the London Plan housing target is for a 10-year period only, and will likely be reviewed prior to the end date of the Local Plan. We consider that if there are available, suitable and deliverable sites within Barnet, such as Land East of Lawrence Street, then this should be considered for future development, in order to plan forward and contribute to the increasing demand for housing within the Borough. Furthermore, should any further sites be required at Examination Stage to contribute to the shortfall of housing across London overall, Land East of Lawrence Street should be considered as a first priority given its sustainability credentials and ability to deliver a range of housing types</p>					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	3,080	Total 2021 - 2036	80,415	35,460	47,000	46,000
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Total 2021 - 2036	80,415	35,460	47,000	46,000																	
Hammerson UK Prop and Aberdeen Standard Investments	BSS01	<p data-bbox="465 847 2148 1238">The retail sector is undergoing substantial change. This is recognised throughout the Local Plan including in para 4.14.12 which states that 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. Furthermore, para 4.5.5 acknowledges the need for town centres to diversify in terms of other uses such as food and drink, becoming social and community hubs as well as economic centres supported by new housing development. The Local Plan also notes that the COVID19 pandemic has accelerated movement away from traditional retail formats and further changed the way society shops and interacts with town centres as the focus of local commercial activity. As a result, the Local Plan explains that the Council is working as part of the West London Alliance on a new study to establish how much additional retail provision may be needed over the period to 2036. Whilst the results of this study are presently unavailable, it is inevitable that the scale of comparison retail growth is likely to be less than previously forecast. However, Policy BSS01 sets out a spatial strategy for the Borough which is predicated on delivering a specific scale of retail floorspace at Brent Cross consistent with that forecast prior to the recent changes to the retail sector. It is acknowledged that this figure forms part of the planning permission granted for the regeneration of the Brent Cross Growth Area, but given the announcement by H/ASI to delay delivery and the nationwide evidence showing a declining demand for retail space in town centres, H/ASI do not consider the inclusion of the floorspace figure in the policy to be ‘justified’ or appropriate. We would suggest the specific retail figure is deleted from criteria aii of Policy BSS01 and replaced with wording which supports the creation of a vibrant and sustainable retail, leisure and mixed use Metropolitan Town Centre at Brent Cross North</p>																			
DTZ Investors UK Ltd	BSS01	<p data-bbox="465 1238 2148 1404">Draft Policy BSS01 sets out the spatial strategy for Barnet. It clarifies the number of homes that the Council seeks to deliver up to 2036, as well as the quantum of new office space, a new regional park and three new destinations for sport and recreation. The policy also states that the Council will seek to minimise the Borough’s contribution to climate change and that, in order to better manage the impacts of development on the climate, growth will be concentrated in the identified Opportunity Areas, together with Barnet’s Growth Areas and District Town Centres. It states that 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. The supporting text for draft Policy BSS01 explains that the Growth Areas have a supply of brownfield and underused land and buildings that offer</p>																			

Representor	Section	Summary of Comments
		<p>opportunities for inward investment, and that they provide identified developable and deliverable sites with substantial capacity for new homes, jobs and infrastructure. DTZ supports the principle of prioritising Opportunity Areas, including NSOA, for growth. DTZ also supports the underlying principle of redeveloping brownfield sites and underused buildings and the draft Local Plan acknowledges that Growth Areas are identified as having a supply of such sites that offer development opportunities. However, we recommend that the wording of this policy is strengthened to further highlight and encourage the redevelopment of brownfield sites. Chapter 11 of the NPPF seeks to make effective use of land and para 119 clarifies that this should be for other uses as well as housing. As currently worded, this policy is not effective or entirely consistent with national policy, as it fails to establish that previously developed land should be prioritised, and therefore it does not promote the most effective use of land. We therefore propose that the wording of draft policy BSS01 is amended to specifically include undesignated brownfield sites as part of the Council's spatial strategy, as set out below:</p> <p><i>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, and previously developed sites. 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.</i></p>
Diocese of London	BSS01	<p>The policy states that between 2021 and 2036 the Plan seeks to deliver a minimum of 35,460 new homes. This is based on the London Plan (March 2021) Market Assessment. A number which is a significant reduction from the previous delivery number of 46,000 based on the Barnet SHMA (Oct 2018). The Standard Method formula, which addresses projected household growth and historic under-supply, identifies a minimum requirement of 5,361 dwellings per annum for Barnet. This equates to 80,415 dwellings across the plan period. This is significantly higher than the figure provided for in the Draft Local Plan. Furthermore, 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. Again, this is significantly higher than the number provided for in the Draft Plan. While it is acknowledged that the 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. The Draft Plan proposed to meet the London Plan target of 35,460 new homes while providing a supply of sites for up to 46,000 new homes. 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. We consider that there is clear justification to deliver above the level of housing envisaged in the London Plan. First, the approach set out in the Local Plan will deliver high density housing within the settlement boundary, the overwhelming form of housing provided would be flats. While there is a significant need for this form of housing in London, there is also a very large need for housing, particularly in an Outer London Borough such as Barnet where families seek larger homes. This is compounded by the effects of the pandemic with a much greater demand for houses which provide more space. The effects on the housing market in Outer London Boroughs are already demonstrating this need. We consider that Barnet need to seek to ensure that they are able to deliver a variety of housing needs, rather than solely concentrate on flatted development. Furthermore, the New London Plan targets are minimum targets and that 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. Barnet should be looking to deliver more than its requirement in order to support the Government's objective to significantly boost the supply of housing (NPPF, para 60). Second, the current approach to meeting the London Plan target fails to capitalise on the opportunity of delivering higher levels of affordable housing. The current target does not adequately address affordable housing need, particularly around social rented housing. Increasing the Local Plan target would allow the Council to meet this wider need and address this unmet need. Such an approach is likely to require the release of Green Belt land, but we consider that this is justified. Barnet is no different from any other local authority with significant levels of 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. In our view, the above steps could be followed to support the release of Green Belt land in the Borough. In summary, we consider that this housing figure is not representative of Barnet's actual identified need. The Council should be assessing the potential of the Green Belt to accommodate growth in order to seek to deliver higher levels of growth to address unmet need.</p>

Representor	Section	Summary of Comments
TFL (Commercial Development)	BSS01	<p>We note the significant reduction in the Council's housing delivery ambitions; the target to deliver a minimum of 46,000 new homes set out in the Reg 18 version of the draft Plan has been reduced to 36,000 during the period to 2036. This remains an ambitious target, requiring an average delivery of 2,364 new homes per annum, which accords with the London Plan 10 year housing target for the borough [London Plan, Table 4.1]. TfL CD can make significant contributions towards the Council achieving this and also your objective to increase the supply of affordable home ownership and rental options. The targets set out in Tables 4.1 and 4.2 of the London Plan should be treated as minima (see para 4.2.5 of the London Plan) and the Mayor encourages boroughs to exceed these where possible while taking into account other policies within the development plan. Exceeding the borough's housing target would make an additional contribution to meeting objectively assessed housing needs, addressing housing affordability issues, and making the most of opportunities to regenerate and redevelop brownfield land in the borough TfL CD continues to support the objectives of this policy to deliver new homes (albeit the target is now reduced to accord with the London Plan), the other growth objectives for commercial and retail floorspace across the town centres, provision of parks, sports and recreation facilities, and the objective to minimise contributions towards climate change. We support the directing of development to the most sustainable locations with good public transport connections and provisions for active travel. However, in addition to the specified Opportunity Areas, Growth Areas and District Town Centres, the policy should make clear that outside of these areas the design-led approach should also be used to maximise the development potential of sites and make the best use of land, particularly on sites which are within 800m of a station or town centre boundary or with PTALs of 3-6. Such an approach would conform with London Plan policy H1 (Increasing housing supply) and would therefore be both 'sound' and 'legally compliant'. We would suggest that the last sentence of policy BSS01 (para C) could be modified as follows: <i>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, and particularly within 800m of a station or town centre boundary and / or areas with PTALs of 3-6 as a result</i>. This would bolster the Council's approach to ensuring that development takes place at optimum densities in the most sustainable locations in order to minimise carbon and air quality impacts, reduce congestion and encourage sustainable and active transport choices.</p>
Barnet Society Committee	BSS01	<p>This proposal is unsound for several reasons. The proposed sport and recreation hub on 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 the playing fields. This would be a flagrant breach of the openness of the Green Belt. We dispute that the proposal is justified by 'very special circumstances'. The proposed hub would replicate sport and recreation facilities already available for community use at the nearby Totteridge and Ark Pioneer Academies, and therefore be poor value for money. We also question whether demand exists for additional provision on this scale. Even if that could be demonstrated, it would be unnecessary to build on this precise site since other less open, far less conspicuous – and probably cheaper and more convenient – sites exist close by. Radically downsize the proposed sport and recreation hub and/ or relocate it to a less intrusive site on Barnet Playing Fields, or omit it altogether. Yes – because the Barnet Society has consistently challenged the rationale and scale of this proposal, and the validity of its location in the Green Belt</p>
Friends of Market Place Playground	BSS01 GSS1 Para 4.6.1 Para 4.28.3	<p>Map 7 of the Local Plan identifies those areas of the Borough that are deficient in open space for both district and local parks. To my knowledge the deficiency within the East Finchley area has been identified but not been addressed in the past 30 years. However, with some creative thinking and determination there is an opportunity to rectify, at least in part, this situation. Market Place Playground N2 sits in the middle of this area of open space deficiency. Well used and highly valued locally there would be scope to expand it through play streets, capturing some of the open land around the nearby tower blocks and incorporating little used areas of land. All of the land is owned by Barnet Council. This is also the historic core of East Finchley and open space led regeneration of the area would open opportunities for promoting the historic value of the area as well. A dedicated voluntary group – Friends of Market Place Playground – has already raised £70,000 in under 6 months to contribute to create a new park incorporating a playable landscape at the Market Place Playground location and we are fully committed to working in partnership with Barnet Council to maximise this opportunity to implement much needed improvements to a vital local green space. Funding for the proposal should be identified and included in the Infrastructure Delivery Plan. Add to BSS01 Spatial Strategy for Barnet - Add new para "a) vi) a new park to address open space deficiency in East Finchley as set out in Policy GSS13" Policy GSS13 Add at end of policy "...and create a new park in East Finchley to address an identified area of open space deficiency." Add new site allocation proposal to Annex 1: Site Number 68 Market Place N2 – A new Park for East Finchley.</p>

Representor	Section	Summary of Comments
		 <p data-bbox="465 528 2136 687">Include relevant changes to paras 4.6.1 by adding at end of para: "The Council will creatively address longstanding areas of open space deficiency including the provision of a new park for East Finchley provisionally called Market Place Park." Para 4.28.3 add "f) a new park in East Finchley, provisionally known as Market Place Park, to address known deficiencies in open space." Include reference to the creation of the park and relevant funding mechanisms including grant money and CIL plus the active local groups supporting the park in the Infrastructure Delivery Plan. A new proposal introduced to the plan will need examination.</p>
Hurricane Trading Estate	BSS01	<p data-bbox="465 695 2136 802">The draft Local Plan recognises the significant development potential of the Borough. We strongly support the growth strategy proposed which is guided by the identification of several Opportunity Areas and Growth Areas. The Opportunity Areas are designated within the London Plan as the capital's principal opportunities for accommodating large scale development. Whilst the Growth Areas are distinctive locations with good public transport accessibility and have a supply of brownfield and underused land and buildings that offer opportunities for inward investment.</p>
CasaBella Developments	BSS01	<p data-bbox="465 807 2136 1407">The Draft Local Plan seeks to deliver between 2021 and 2036 a minimum of 35,460 new homes (2,364 per annum). The Council has set this target following the preparation of a Strategic Housing Market Assessment which identified a Full Objectively Assessed Need for 46,000 new homes over the plan period (3,060 per annum). This target continues to be significantly below housing need when calculated using the Governments Standard Methodology (applying this methodology the Council is required to deliver 5,361 new homes per annum). This identified shortfall is considered to fail the 2021 NPPF Para 35 'test of soundness' by virtue of the Draft Plan not being positively prepared to meet housing needs and not being consistent with the NPPF's objective to significantly boost the supply of homes. As identified within the Secretary of State Directions received during the examination of the new London Plan: □ There is a need to maximise housing delivery in London by taking proactive steps to surpass the housing requirements in the London Plan. □ There is still a very long way to go to meet London's full housing need. The Secretary of State noted that the London Plan 2021 clearly and starkly fails to achieve the housing need and asked that the Mayor starts working to dramatically increase the capitals housing delivery and to start considering the next London Plan to bridge the gap having regard to the acute housing need London faces. Taking the above into account, the reduction from 46,000 homes per annum stated within the Regulation 18 Draft Local Plan to 35,460 homes per annum is disappointing and does not represent a commitment to maximising delivery of housing in London. Such reduction is contrary to bringing the Draft Plan targets closer to housing need and result in the Draft Plan not being positively prepared. Taking account of the identified housing 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. 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 5,400 homes in District Centres and 3,350 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 within 100m from the Colindale District Centre where significant additional growth is proposed. Such growth is supported in the 2021 London Plan where development of brownfield sites on the edge of town centres are promoted under Policy GG2. The 2021 London Plan and NPPF 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 and provides further justification for allocation of the site.</p>

Representor	Section	Summary of Comments
Haringey Council	BSS01	We welcome Barnet's decision to set a minimum housing target of 35,460 new homes across the borough over the next fifteen-year period consistent with the net housing completion targets set out in Policy H1 of the London Plan. We note that Barnet has provided a supply of sites for to 46,000 homes representing Barnet's full objectively assessed need for housing as derived from the Barnet Strategic Housing Market Assessment (2018). We note that a robust strategy is in place to deliver infrastructure to support growth above the London Plan target (see below) and therefore do not have any objection to the enhanced level of supply in the plan
Hertsmere Borough Council	BSS01 Para 4.4.5	The proposed housing target of 35,460 falls far short of the level of need identified through the application of the standard method and also through the SHMA. Whilst we note the Inspector's advice to set the housing requirement to match that handed down by the adopted London Plan the potential implications of such under provision in terms particularly of increased pressure on housing in Hertsmere, where there are already acute affordability issues, are of concern. Consideration should be given to setting a higher housing target, more closely related to that arising from the application of the standard method.
Theresa Villiers MP	BSS01 Para 4.6.2	The proposed sport and recreation hub comprises a large building, a floodlit outdoor games area and parking for 65 cars. I believe this is a breach of the openness of the Green Belt. Parks and open spaces should be among the highest priorities for the council. They contribute significantly to the quality of life for residents; and are a key reason why people move to Barnet. With the expected increase in population, they will become every more important, not least because many new homes being built either have small gardens or none at all. Additionally, there are existing sport and recreation facilities for community use at the nearby Totteridge and Ark Pioneer Academies. This proposal, therefore, is not value for money and I do not believe that demand for this proposal has been demonstrated. The council needs to demonstrate that this proposal is needed in this area, given the facilities already available. If it is demonstrated that they are needed, then a reduced scheme should be considered – one that complements the existing sporting facilities. I would like the opportunity to elaborate on the importance of retaining green belt land.
LB Brent	Key Diagram	The Council welcomes the recognition that Burnt Oak and Colindale/The Hyde are town centres that cross over the boundary into Brent and the identification of the West London Orbital which also crosses into the borough. This points to an understanding that there should be engagement between the two boroughs on an on-going basis on these matters. The Council in its previous response to Reg 18 suggested greater clarity between the use of the terminology Opportunity Area and Growth Area, which at times are interchangeable or can mean different things. LB Barnet has considered this revision however, greater clarity is required. Para 3.4.4 refers to 'Brent Cross Cricklewood' as an Opportunity Area (which it is in the London Plan). The Key Diagram (Map 2) shows Cricklewood as a Growth Area (in orange based on the map key where Opportunities Areas are identified in yellow). In addition, another minor suggestion to add '/' for consistency with the London Plan is suggested. The London Plan refers to the Opportunity Area as 'Brent Cross/Cricklewood'.
DTZ Investors UK Ltd	Key Diagram	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. The Key Diagram includes the Opportunity Areas that are designated within the London Plan, as the capital's principal opportunities for accommodating large scale development. The draft Local Plan states that the Opportunity Areas have the highest expectations for delivering new homes and new jobs as well as supporting infrastructure. The NSOA is shown indicatively on the Key Diagram and it includes the Site. DTZ is supportive of the inclusion of the Site within the NSOA, as it is an excellent example of a brownfield site that is suitable for redevelopment for alternative uses, as well as an appropriate location for tall buildings (as discussed in the representations to Draft Policies CDH04 and GSS01). However, as currently shown, the boundaries of the NSOA are unclear. In order to provide certainty for developers, the boundary should be clearly defined through the preparation of the Local Plan. At present, the Key Diagram does not sufficiently define the boundaries of the NSOA. It is therefore not effective and should be amended in order to be sound.
Brent Cross South Limited Partnership ('BXS LP'),	Key Diagram	The Key Diagram does not reflect the full extent of the Brent Cross/Cricklewood OA, as designated in the London Plan 2021. The map is also inconsistent in the way it shows the various designations – both Brent Cross Growth Area and Cricklewood Growth Area are within the OA, but the former is shown only as an OA (yellow) and the latter only as a Growth Area (orange). It is also considered that the Key Diagram should show the future planned Metropolitan Town Centre at Brent Cross (consistent with the objectives of Policy GSS02 and the development consented by the outline planning permission).
TFL (Commercial Development)	Key Diagram	Linked to our comment immediately above, and to ensure that growth and new housing can be focussed in all accessible locations, particularly those with good public transport connections, we would suggest that consideration is given to drawing indicative 800m zones around stations and town centre boundaries.
TFL (Spatial Planning)	Key Diagram	We welcome the amendment to the Crossrail 2 route which is now shown correctly terminating at New Southgate.
Roger Chapman Ramblers Herts	Key diagram & Policies map	<i>add Strategic Walking network map – see separate attachment for map.</i> <i>Amend all site specific proposals indicated on the attached sheet to include references to the scope for improving walking linkages.</i> Active travel and strategic walking routes are key elements in assisting the shift from car borne to active travel and this issue needs to be examined.

Representor	Section	Summary of Comments
& North Middlesex		
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.
LB Brent	Chapter 4	<p>The Council in its previous response to Reg 18 suggested greater clarity between the use of terminology of Opportunity Area (OA) and Growth Area (GA). LB Barnet has considered this revision however, greater clarity is still required. For example in Policy GSS01, under the subtitle part a) Growth Area: 'Brent Cross Cricklewood' is listed but referred to as OA. Following Policy GSS01, the title of para 4.9 says 'Brent Cross Growth Area'. However, within para 4.9, the term 'Brent Cross Cricklewood OA' is used. There is no explanation as to what 'Brent Cross Growth Area' is till para 4.10.3 where it breaks down 'Brent Cross Growth Area' into 3 parts: Brent Cross North, Brent Cross Town, and Brent Cross West (Thameslink). There is further confusion as 'Policy GSS01 Brent Cross Growth Area' sets a housing delivery of 9,500. 'Policy GSS02 Brent Cross West Growth Area' sets a housing delivery of 1,800 homes. If Brent Cross West GA is part of Brent Cross GA, why does it have a separate capacity and not inclusive of the 9,500 homes? This needs to be set out in a clear format in 'Policy GSS01 Delivering Sustainable Growth' and consistent use of terminologies between the policies. In addition, In Policy GSS01, It lists 'Brent Cross West' and its housing target. However, the list does not acknowledge 'Brent Cross North' and 'Brent Cross Town'. In para 4.11.1, it mentions that Brent Cross North has a consent to deliver 800 new homes. Similarly, Brent Cross Town is delivering 6,700 new homes.</p> <p>Proposed modification</p> <p>a) Growth Areas <u>Growth and Spatial Strategic Areas (23,300 homes):</u> <u>Brent Cross / Cricklewood Opportunity Area (referred in the Plan as Brent Cross Growth Area) – 9,500 homes (Policy GSS02)</u> <u>Brent Cross West Growth Area – 1,800 homes (Policy GSS03)</u> <u>Brent Cross North – 800 homes</u> <u>Brent Cross Town – 6,700 homes</u> <u>Cricklewood Town Centre Growth Area 1,400 homes (Policy GSS04)</u> <u>Edgware Town Centre Growth Area – 5,000 homes (Policy GSS05)</u> <u>Colindale Opportunity Area (referred to as Colindale Growth Area in the Plan) – 4,100 homes (Policy GSS06)</u> <u>Mill Hill East – 1,500 homes (Policy GSS07)</u></p> <p>b) District Town Centres – 5,400 homes (Policy GSS08) <u>Barnet's District Town Centres (Policy GSS08)</u></p>
Home Builders Federation	Section 4.4	<p>HBF agrees that the Council should plan for 2,364 new homes per annum as a minimum. This is the requirement figure for Barnet established through the examination of the new London Plan. The Mayor is the strategic plan-maker for all London. London is treated as a single housing market area. As the GLA SHMA 2017 (the report that informed the new London Plan) observes at para 1.11: <i>London boroughs have in the past carried out their own assessments of housing need either locally or in sub-regional partnerships. However, because London can be considered as single housing market area and the London Plan sets capacity-based housing targets at the local level, the draft new London Plan states that boroughs are not required to carry out their own needs assessments. This is consistent with the view of the inspector who examined the FALP, whose report stated that it was the role of the London Plan to determine the housing need for London as a whole and to guide the distribution of housing to meet that need. It is also consistent with the proposals in DCLG's recent consultation on 'Planning for the right homes in the right places'.</i> Consequently, the Mayor assesses the housing need for London in aggregate and then apportions this among the 33 London boroughs and the two development corporations based on evidence of capacity (mainly large strategic sites) and a judgement made about potential capacity over the plan period. This potential capacity is based mainly on windfall supply in recent years plus a judgement made about small sites supply as a consequence of the policy intervention in Policy H2 of the London Plan. See para 4.1.8 of the London Plan. There are pros and cons with this approach, but the HBF considers this to be an efficient and effective way to plan for the housing needs of this very large planning area. It avoids debate, uncertainty and inconsistency in methods used at the level of the local plan. We agree with the Council that the figure of 2,364 net new homes a year (or 35,460 over the plan period) must be considered the minimum required, because: a) there is a strategic housing shortfall across London of 14,000 homes a year. This is the difference between the objective need of 66,000 homes a year and the realistic capacity to provide 52,000 homes a year; and b) the evidence from the Council's own local assessment of need which indicates potentially higher levels of need. The Council has summarised this in the Plan at table 4: Of all these figures, the figure from the Draft London Plan of a need for 3,134 homes a year is possibly the one that is most useful as a reference point, as this derives from the overall assessment for London of 66,000 homes a year, with 3,134dpa being Barnet's original share</p>

Representor	Section	Summary of Comments
		of that total (based on a judgement about land capacity) before the examining Panel concluded that the Mayor's original estimate of yields from small sites was unrealistic.
Home Builders Federation	Section 4.8	<p>The Local Plan is unsound in its approach towards facilitating small site delivery. It conflicts with national and London Plan policy. This section of the Local Plan describes the Council's approach to supporting the delivery of housing. Para 4.8.2 describes how housing delivery will focus chiefly on the Opportunity and Growth Areas, and the borough's town centres. According to Table 5 these two categories of land will account for 28,700 homes (23,300 in the growth and opportunity areas and 5,400 in the town centres). There are five other categories of supply, but the last one – small sites delivery – is supposed to account for 5,100 homes over the plan period. According to the London Plan and its Table 4.2, Barnet is required to provide 4,340 homes on small sites over ten years, or 434 homes a year. Over a 15-year plan period this would require a total of 6,510 homes.</p> <p>We acknowledge, on the basis of Table 5 of the Local Plan and without delving down into the detail about the deliverability of individual sites, that the Council is in a relatively strong position in that it has been able to identify theoretical capacity for 46,000 homes compared to a local plan requirement for 35,460. However, it must be acknowledged that the allocation for small sites is only theoretical supply – it is a windfall figure. This is contrary to the thrust of national and London Plan policy, which requires local authorities to adopt more active measures to identify and allocate small sites of 0.25ha in size or less. The NPPF, at para 69 requires plan-makers to (among other things): <i>"Identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved."</i> Similarly, the London Plan recognises that increasing the supply of homes from small sites is a strategic priority. As it observes at para 4.2.1: <i>For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.</i></p> <p>London Plan Policy H2, part B, requires London boroughs, among other things, to: <i>3) identify and allocate appropriate small sites for residential development 4) identify and allocate appropriate small sites for residential development 5) grant permission in principle on specific sites or prepare local development orders.</i> The reason for these policies is to help support and consolidated the work of SME housebuilders who have declined significantly since the advent of the plan-led system in 1990, owing chiefly, to the reluctance of local authorities to identify and allocate small sites. The paucity of allocations means that smaller developers fail to benefit from the statutory principle for applications to be determined in accordance with the development plan, unless material considerations indicate otherwise (as stated in para 2 of the NPPF). Without a land-use allocation the acceptability of development is doubtful and it is costly, time-consuming and very risky to promote a site and secure a planning permission. For this reason, the Government has intervened with certain measures to try and create a planning environment that will support better the establishment and growth of a strong SME sector. Increasing the number of small site allocations should have a number of benefits, not least, improving rates of delivery, improving supply overall, and introducing greater competition. See also the London Plan's observations on the benefits of small sites and small developers at para 4.2.2. The small sites target for London set by the London Plan, including the 4,340 required over ten years in Barnet, is the minimum number required. We consider that the Council will need to do more to identify and allocate more small sites in the Local Plan to support small site delivery, making this into a more reliable supply rather than a hope. We have considered Annex 1 – Schedule of Site Proposals – in order to understand better if small sites are being allocated to help deliver the small sites requirement. The list of sites in Annex 1 is very helpful. This list - by our calculations - includes 17 individual sites of 0.25ha in size or less. We have also included a few on the cusp of that threshold – those below 0.30ha in size. The list includes three student schemes and the Council has made the conversion to the equivalent number of standard self-contained homes (use class 3C dwellings) following the PPG. The small sites are:</p>

Representor	Section	Summary of Comments		
		Site no	Site size (hectares)	Estimated residential capacity
		1	0.13	12
		18	0.16	12
		19	0.25	43
		20	0.21	25
		25	0.19	29
		26	0.20	20
		31	0.27	46
		32	0.08	7
		34	0.06	9
		35	0.09	23 (69 student bedrooms)
		36	0.26	60 (180 student bedrooms)
		39	0.13	21
		41	0.23	16 (48 student bedrooms)
		48	0.17	19
		52	0.26	61
		59	0.15	48
		63	0.28	48
		65	0.25	20
		Total		519
		<p>The number of homes on small sites allocated of 0.30 ha in size or less amounts to 519. This falls far short of the 4,340 homes on small sites over ten years required by the London Plan, and is just over the target for one year's supply (434dpa). The three schemes providing student housing should be discounted as they will not be providing general needs housing, and the market for student accommodation is already established, vigorous and competitive. This is not the case for SME housebuilders trying to provide general needs housing. The purpose of national and London Plan policy is to help support small housebuilders to establish themselves in London not to assist institutional investors already providing student accommodation. Once these three schemes are discounted, the number of homes for general needs provided on allocated small sites falls to 420 homes – a figure that falls short of the requirement for just one year. We appreciate the difficulties that local planning authorities face with identifying and allocating small sites, and we welcome the efforts made so far by Barnet Council to at least allocate some, but the number allocated falls far short of the requirements of national and London Plan policy. National policy (NPPF, para 69) requires that 10/% of the requirement is provided on allocated sites – equivalent to 3,546 in the case of Barnet's mew plan. We are still far short of this. Windfall is welcome, but it cannot be relied upon to the same extent as actual allocations.</p>		
LB Brent	Para 4.1.1	<p>GG2 Making the best use of land and GG4 Delivering the homes Londoners need are not policies and London Plan lists them as 'Good Growth Objectives'. Proposed modification London Plan Policy <u>Good Growth Objective</u> GG2 Making the best use of land Policy <u>Good Growth Objective</u> GG4 Delivering the homes Londoners need</p>		
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.10.2	<p>We welcome the discussion here about the meaning of 'comprehensive development'. However, we feel that the definition could benefit from further clarity. We suggest the following wording: <i>In general planning and regeneration terms, comprehensive development reflects an area that is refers to planned to ensure the development of strategic sites which is undertaken in a coordinated way, with the goal of improving and regenerating the area as a whole. It is usually applied to large and/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 and/or Developers.</i></p>		
Hammerson UK Prop and	Para 4.10.3	<p>Para 4.10.3 explains that the Brent Cross Growth Area is itself split into a further three sub areas: ▪ Brent Cross North; ▪ Brent Cross Town; and ▪ Brent Cross West (Thameslink).</p>		

Representor	Section	Summary of Comments
Aberdeen Standard Investments		H/ASI are concerned that this naming creates an unhelpful confusion between a) Brent Cross West/Staples Corner Growth Area, and b) the Brent Cross West (Thameslink) part of Brent Cross Growth Area. The matter is not helped by the plans at Map 3 and 3A – neither of which show the Brent Cross West (Thameslink) area.
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.10.3	This para gives the impression that the three parts of the Brent Cross Growth Area are each within a single ownership, and will come forward in three discrete parts. The situation is more complex and we suggest that this para should be amended as follows to ensure accuracy: <i>The regeneration of the Brent Cross Growth Area is being delivered in three principal parts: Brent Cross North, Brent Cross Town, and Brent Cross West (Thameslink). These three areas are in multiple land ownerships and are being delivered separately by the Council and different development partners.</i> Please also note that Brent Cross West (Thameslink) as referred to within this para lies partly within a different Growth Area as designated in the Plan (Brent Cross West).
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.10.4	This should be amended as follows in the interests of consistency: <i>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.</i>
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.12.1	We suggest that this para is amended as follows: <i>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 over 6,700 new homes comprising a mix of types and tenures (including Build to Rent), 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 mixed use neighbourhood residential quarter will be supported by new and improved schools, community, health and leisure facilities, as well as improved parks and open spaces.</i>
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.12.2	We suggest that this para is amended as follows: <i>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.</i>
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.12.4	Detailed consent is now in place for six plots. It is therefore suggested that this para is amended to refer to ' <u>over five</u> development plots.'
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.14.6	As above, detailed consent is now in place for six plots. It is therefore suggested that this para is amended to refer to ' <u>over five</u> development plots.'
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.15.1	We support the recognition that the outline permission needs to be supplemented by further applications, but are concerned at the unintended implication or inference that the consent is now out of date. We suggest that the second half of this para is amended as follows: <i>The existing outline planning permission was originally approved in 2010, is now nearly a decade old and whilst 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 applications to update areas of the masterplan as it is evolved and as the development responds to updated market and policy shifts. The existing outline planning permission was originally approved in 2010 and subsequently amended and updated in 2014. , is now nearly a decade old and Development pursuant to the outline planning permission will be supported and whilst it has flexibility to allow the phasing and delivery sequence of the development to be adjusted, it is also 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. Any new planning applications will need to demonstrate their relationship with the outline planning permission, including not undermining comprehensive development of the Growth Area.</i>
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.16.4	This should be amended as follows in the interests of clarity: <i>There is much potential for a beneficial interrelationship between Brent Cross West and the wider Brent Cross Growth Areas, and opportunities for connectivity between the two should be maximised.</i>
Bestway Ltd	Para 4.16.6	The para refers to the "need to widen and upgrade" Geron Way "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". However, no evidence is presented in the Local Plan which supports or justifies this

Representor	Section	Summary of Comments
		specific requirement. In this regard, discussions which Bestway have had with Barnet Council planning and regeneration officers have indicated that there may be no need for buses to travel along Geron Way to access the new railway station, but instead buses may be able to service the station using existing bus stops on Edgware Road. Therefore the para should include flexibility on whether buses are required to travel along Geron Way. Para 4.16.6 should be amended to allow flexibility on the need to widen Geron Way to accommodate buses, which will only be known after more detailed analysis is undertaken. The para should be amended read: "Subject to further analysis, it may be necessary to widen and upgrade Geron Way 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".
TFL (Spatial Planning)	Para 4.23.2	We welcome the amended description of the West London Orbital in response to our previous comments. Although construction work may begin by 2026, the earliest date when passenger services are likely to operate is 2029. As such, the date should be altered to ensure consistency with other documents.
TFL (Spatial Planning)	Para 4.23.3	The final sentence should be amended to reflect the fact that there is safeguarding in place for part of the Crossrail 2 route to New Southgate. We suggest it is simplified to read as follows 'This safeguarding refresh will include a revised the alignment of the proposed New Southgate branch. which is a part of the Crossrail 2 route that is not currently safeguarded.
TFL (Spatial Planning)	Para 4.24.5	We strongly support the redevelopment of station car parking to deliver growth and as part of a shift towards sustainable travel. The new London Plan states that car-free development should be the starting point in all well-connected locations. Any re-provision of car parking must therefore be assessed against the same criteria as proposals for a new station with a car park. Where there is sufficient access by active travel and by bus, we would strongly urge the Council to resist the re-provision of parking except where clearly justified e.g. for disabled persons accessing the station or for operational reasons.
LB Brent	Para 4.26.6	A5 Edgware Road is one of the principal vehicular movement corridors for most Opportunity Areas and Growth Areas of Edgware, Colindale, Brent Cross and Cricklewood. This corridor also serves other areas recognised for development such as Burnt Oak and Colindale/The Hyde town district centres and West Hendon Estate renewal. Whilst reference appears to have been made to healthy streets throughout the Plan, it could be interpreted as focussing on streets within the developments. Para 4.26.6 refers to enhancement of routes and healthy streets initiative to a number of roads; however A5 Edgware has not been included in the list.
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.28.3	Sub-para e) should read as follows: <i>e) work as part of the regeneration of Brent Cross <u>Growth Area</u> (including improvements to Clitterhouse Playing Fields)...</i>
Mill Hill Preservation Society	Para 4.28.4 :	Clause 4.28.4 The enhancement of footpaths, cycling and bridleway networks need to include for the omission of faster electric cycles and scooters as a matter of public safety. (see accompanying letter) The Society has noticed a considerable number of references to 'enhancement of footpath, cycling and bridleway networks' and here is as good a place as any to comment on this aspect. We trust that due consideration will be given to safety issues where routes are shared with often elderly walkers, children and potentially less able people. This is important, as there is an increasing range of faster electric cycles and scooters that could be used on these improved routes and we would not wish to promote anything that might lead to an increase in accidents. We note the plan does emphasise the development of the Green Grid for "walking and cycling". Clause 4.28.4: Redraft to include the exclusion of electric cycles and scooters on grounds of health and safety.
TFL (Commercial Development)	Para 4.4.5	TfL CD supports the Council's approach, in para 4.4.5, to provide a supply of sites for up to 36,000 new homes in order to maximise the prospects of meeting the London Plan and draft Local Plan's targets for delivering a minimum of 2,364 new homes each year.
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.5.2	The reference to 'Brent Cross' here is referring to the Brent Cross Growth Area, and should be referenced as such to avoid confusion. The following wording is suggested in the interests of clarity and consistency: <i>The BELR concluded that efforts should be focused on protecting employment land and estimated that Barnet required, in addition to <u>the office space consented in the Brent Cross Growth Area</u>, another 67,000 m2 of new office space.</i>
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.5.5	The reference to 'Brent Cross' here is referring to the Brent Cross Growth Area, and should be referenced as such to avoid confusion.
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.6.2	The reference to 'Brent Cross' here is referring to the Brent Cross Growth Area, and should be referenced as such to avoid confusion.

Representor	Section	Summary of Comments
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.8.2	It is suggested that this para is re-worded to provide consistency. The following wording is suggested: <i>Delivery of new homes will mostly be in the key Growth Areas of Brent Cross, <u>Brent Cross West and Cricklewood (Brent Cross/Cricklewood Opportunity Area), Colindale (Colindale/Burnt Oak Opportunity Area), Mill Hill East and 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.</u></i>
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.9.2	Here, the Plan refers to the Brent Cross Cricklewood Opportunity Area, when it is actually discussing the Growth Area. It is suggested that these paras are amended to provide consistency, as follows: <i>The Brent Cross Cricklewood Opportunity Area <u>Growth Area</u> covers 151 hectares, with proposals including a new commercial quarter <u>uses and a Metropolitan Town Centre, incorporating and connected to Brent Cross Shopping Centre. The Opportunity Brent Cross Growth 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.</u></i>
Brent Cross South Limited Partnership ('BXS LP'),	Para 4.9.4	The outline consent also covers part of the Brent Cross West Growth Area as shown on Map 3A. It is therefore suggested that the text is amended as follows: 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 (<u>along with parts of the Brent Cross West Growth Area</u>) to create a new mixed use town centre with an additional 56,600m2 of comparison retail floorspace; <u>approximately 7,500 new homes including affordable homes; a new and commercial quarter</u> uses 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.
Mill Hill Missionaries	Para: 4.8.6 Figure/Table: 5 and 5A	Table 5 indicates that within the first five years of the plan period (2021/22 until 2025/26), land is available for 14,250 new homes however Table 5A sets out only 4,600 new homes are on identified sites. Given the requirement is for a minimum of 2,364 new homes per annum / 35,460 homes across the Plan Period (in line with the London Plan), this would require a minimum of 11,820 over the next five years, plus an allowance for an appropriate buffer. This places reliance on the areas identified within the trajectory and the identified sites within Table 5A to be deliverable within the timeframe anticipated, otherwise the Council will likely be unable to demonstrate a five years supply of housing within the early years of the Plan period. Furthermore, as demonstrated within the Council's latest Housing Delivery Action Plan (2020), the Council delivered 94% of its requirement and is now required to produce an Action Plan to demonstrate how it will ensure deliverability within the Borough. In line with NPPG, the Council are also required to apply a 10% buffer to their five-year housing land supply position which indicates a need for 13,640 homes in the first five years on deliverable sites. We consider the Draft Local Plan is unsound as it is contrary to national policy and is not positively prepared. Table 5 and Table 5A of the Draft Local Plan indicate that the Council may not be able to demonstrate a five-year housing land supply. The Council should provide clarity on the identified sites and how the housing target will be met in full within the Plan Period, especially years one to five of the plan period, in line with Para 68 of the NPPF. Land East of Lawrence Street is available, suitable, and deliverable within the first five years of the Plan Period. We also have concerns regarding the deliverability of sites and the lack of identification on where homes will be provided in the Borough, which is contrary to the NPPF and the NPPG.
TFL (Spatial Planning)	Paras 4.27.1, 4.27.2 & 4.27.3	The wording of these paras should be more positive in promoting the removal or reduction of parking spaces, particularly in well-connected locations. There is no need or demand for general car parking in many locations where alternative travel options exist and, as such, there should be no absolute requirement to demonstrate surplus capacity or to replace spaces.
Home Builders Federation	GSS01	Aspects of the policy are unsound because they are contrary to the London Plan. Town Centres We note in Annex 1 that this category is defined in para 16.6.1 in the following way: <i>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</i> This seems contrary to the London Plan which wishes to encourage more housing supply, especially of small sites, where these are within 800m of the town centre boundary. London Plan policy H1, in seeking to improve housing supply, wishes to: <i>'optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.'</i> The Council is drawing the net too tightly around its town centres, thereby limiting the potential capacity for new homes, or making it more difficult for an applicant to secure a planning permission on infill sites. Unless we have misunderstood the Council's approach, the Council should set the parameters more widely, reflecting the London Plan recommendation of 800m around transport nodes. Major Public Transport Infrastructure We note in Annex 1 that this category is defined in para 16.10.1 as: "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." We note, however, that the London Plan policy H1, in seeking to improve housing supply, wishes to: <i>'optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</i>

Representor	Section	Summary of Comments
		<p><i>a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.'</i> The Council is drawing the net too tightly around important public transport hubs, thereby limiting potential residential capacity, or making it more difficult to secure a planning permission on infill sites. Unless we have misunderstood the Council's approach, the Council should set the parameters more widely, reflecting the London Plan recommendation of 800m around transport nodes.</p>
Bridge Industrial and Extra MSA London Gateway Ltd	GSS01	<p>Barnet's Employment Growth Strategy The identification within Policy GSS01 of principles aiding the delivery of sustainable growth across Barnet, in order to create more than 27,000 new jobs across the plan period up until 2036, is welcomed in principle. Likewise, the acknowledgement that employment growth can be delivered sustainably outside of identified employment areas such as town centres and Locally Significant Industrial Sites (as per Policy ECY01(j)) dependent upon satisfying site-specific criteria is also seen to be beneficial, providing flexibility for growth across the borough to ensure that Barnet's employment targets can be achieved rather than prohibiting development outside designated locations. However, whilst a clear strategy has been developed for the delivery of office floorspace across the borough, as demonstrated by the quantitative floorspace targets and locations for growth re-iterated throughout Policies BSS01, GSS01 and ECY01, there is no coherent strategy for the delivery of industrial land across the borough. It is surprising that given the identification in Para 9.2.1 of Barnet's "relatively low supply of established industrial sites" and the identified demand of up to 13.5ha of industrial land as per Para 9.7.2, no detailed strategy identifying the quantum of floorspace sought or industrial jobs to be created has been devised. Instead, Para 9.7.3 of the Draft Local Plan simply states that the borough: <i>"envisages meeting the identified [industrial need] through intensification and windfall"</i>. This is considered to be an unrealistic strategy which pays no regard to demand or viability considerations. There is no evidence that intensification of industrial land has been delivered anywhere in the borough to date, and in our experience it is a form of development which is only likely to be viable in certain higher value parts of London. As such we consider that intensification is unlikely to come forwards in Barnet in the short to medium term. We note that para 9.7.4 of the DLP acknowledges that industrial intensification will present challenges for smaller LSISs in Barnet, which underscores our questions as to why the DLP's proposed industrial strategy is seemingly wholly dependent upon the intensification of existing employment areas. Policy GSS11 of the Draft Local Plan, which considers the borough's main road corridors and the sustainable growth achievable along said routes, is also silent on the potential for sustained employment in such areas. It is recommended that Policy GSS11 is revised so that consideration is given to the employment potential along such routes, as this would help to identify and support suitable areas for employment growth. In this regard, it is also noted that the M1 motorway is not identified as a 'Major Thoroughfare'. If Policy GSS11 is revised, it is recommended that the M1 motorway be identified as such, given it forms an arterial road network which could support employment land uses, helping to direct employment, and particularly industrial land uses, toward suitable locations as per requirements of Policy ECY01 (f) and (j).</p>
Taylor Wimpey	GSS01	<p>The Draft Local Plan identifies a housing need for Barnet of 35,460 new homes (2,364 per annum, London Plan 2021 target) over the Plan Period from 2021 up to 2036, while providing a supply of sites for up to 46,000 new homes (3,060 per annum) which is based on the Objectively Assessed Need for Housing as identified in Barnet's SHMA 2018. Policy GSS01 and Table 5 set out how the housing targets will be met. The strategy outlined in Policy GSS01 and Table 5 is not sound as it is over reliant on large and complex urban regeneration sites, and is not compliant with London Plan Policy H2 with regard to small sites. Over-Reliance on Large Sites The proposed strategy for meeting housing need is overly optimistic and not effective as it is over-reliant on complex urban regeneration sites. It is not justified as there is insufficient evidence provided that these large urban regeneration sites will deliver in the required timescales. This issue has previously been acknowledged in Barnet's Housing Delivery Action Plan (2020) which states that a 'high dependence on larger sites results is a potential risk to overall future delivery, given the broad reliance on meeting a significant proportion of the target for new homes through a small number of very large schemes'. For example, the Brent Cross Growth Area is proposed to deliver 9,500 homes by 2036. Section 4.15 of the draft Local Plan notes that the development of the Brent Cross Growth Area is dependent on factors relating to land ownership, viability and phasing. The existing outline planning application was approved in 2010 and will need to be supplemented through further planning applications to update areas of the masterplan. The size, complex history and landownership arrangements of this site make it difficult to guarantee that 9,500 homes will be delivered by 2036 and sufficient evidence is not provided to justify this. At Edgware Town Centre, 5,000 new homes are expected to be delivered by 2036, with 3,350 of these by 2031. However, the Council has not yet received any development proposals for this site and does not indicate that they have had discussions with developers or landowners. There could be complex issues to do with landownership, viability or previous uses of the site which may delay delivery and these do not appear to have been sufficiently assessed. Therefore, insufficient evidence is provided that 3,350 homes will be delivered in Edgware Town Centre in the next ten years, and 5,000 by 2036. The two examples above indicate that the reliance on large sites in the draft Local Plan is not justified. The plan is therefore not sound in this regard. In order to make the plan sound, an alternative scenario for meeting housing need should be considered which includes more allocated medium sites, including targeted release from Metropolitan Open Land (MOL), where MOL is providing no public benefit, that could be delivered in the shorter term. The land to the east of Colney Hatch Lane, which Taylor Wimpey Strategic Land has an interest in, 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</p>

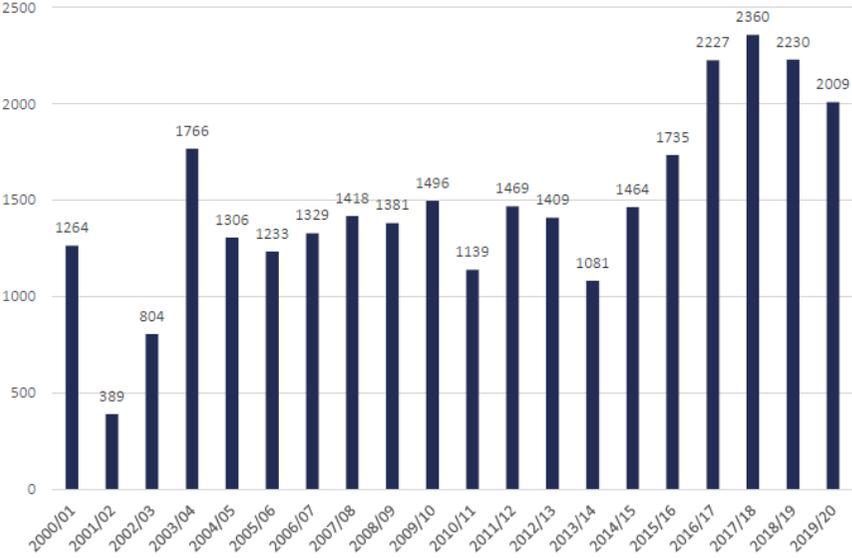
Representor	Section	Summary of Comments
		<p>not publicly accessible. The site is unconstrained, available and deliverable within the plan period. This is an example of a suitable smaller/medium site which would assist with meeting Barnet's housing need and reduce the over reliance on large, complex urban regeneration sites to meet the housing requirement in the shorter term. Small Sites The proposed strategy for meeting housing need is not justified as there is an overreliance on very large regeneration sites, that will take a long time to deliver, and it is not consistent with London Plan Policy H2 and the strategic priority of increasing housing delivery from small sites (below 0.25ha). Only 5,100 of 46,000 new homes in the plan period are to be delivered through small sites. The London Plan (Table 4.2) sets out a target for Barnet of 4,340 net housing completions on small sites within ten years. If this figure is extrapolated at 434dpa for the plan period, at least 6,510 homes should be planned for on small sites in the new Local Plan. The plan therefore fails to meet the London Plan's target for net housing completions on small sites and some small to medium size sites should be allocated, rather than a reliance on windfalls. This is not compliant with London Plan Policy H2, which states that boroughs should pro-actively support well-designed new homes on small sites, in order to significantly increase the contribution of small sites to meeting London's housing needs. The plan's figure of 5,100 homes is 'based on previous trends for delivery from small sites'. The figure of 5,100 is not a proactive approach to delivery of small sites and further small to medium sites should be allocated. As confirmed in para 4.2.1 of the London Plan, increasing the rate of housing delivery from small sites is a strategic priority. The draft Local Plan is therefore unsound, as it is not in compliance with the targets set out in London Plan Policy H2 and the deviation from this policy is not sufficiently justified. In order to achieve a sound strategy, the Council need to allocate more small/ medium sized, available and deliverable sites that could deliver homes in the short to medium term, until the larger, complex regeneration sites deliver housing on a regular basis. This would ensure that a five-year housing land supply is in place, and provide other benefits such as the earlier provision of affordable housing.</p>
Oakfield House, Burtonhole Lane, Mill Hill	GSS01	This policy references Mill Hill as the growth area, whereas it is Mill Hill East as the growth area. Consistency in terminology should be reviewed throughout the document.
Barnet Cycling Campaign	GSS01	The targets for growth are significant and cannot be delivered with traditional suburban car-centric transport and planning. Active travel, combined with public transport, is essential to achieving sustainable and 'good' growth
Brad Blitz	GSS01 CDH01 CDH08 ECC06	<p>NB. LB Barnet have not published GSS01 Delivering Sustainable Growth on its webpage as of 8 August 2021 so I cannot comment on specific paras, only references in secondary sources.</p> <p>NB. LB Barnet have not published CDH01 Promoting High Quality Design on its webpage as of 8 August 2021 so I cannot comment on specific paras, only references in secondary sources</p> <p>NB. LB Barnet have not published CDH08 Barnet's Heritage on its webpage as of 8 August 2021 so I cannot comment on specific paras, only references in secondary sources.</p> <p>NB. LB Barnet have not published ECC06 Biodiversity on its webpage as of 8 August 2021 so I cannot comment on specific paras, only references in secondary sources.</p>
Brad Blitz	GSS01	<p>The draft Local Plan Reg 19 Cites Policy GSS01 Delivering Sustainable Growth as one basis for the proposed developments in Hendon. I note that Barnet has recorded: 2By 2036 Barnet has successfully demonstrated the benefits that well planned growth can deliver. 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" (Local Plan Reg 19, page 23). Hendon is not mentioned in the above list. However, the proposed developments in the two conservation areas of the Burroughs and Church End do not seek to protect the character and distinctiveness as previously recognised in the 2011/12 Character Appraisal Statements. The proposals by virtue of their size, scale and density pose major threats to the character of the area. This fact has been recognised by Historic England to two letter submitted to the Council on 22 February 2021 and 19 July 2021 where the heritage body identifies significant harm resulting from the proposed developments in the two conservation areas, including the proposed alterations to the Hendon Library, and the erection of unsympathetic buildings on the Burroughs and more importantly, the overdevelopment of buildings on Church End, overlooking the ancient church.</p>
Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth	GSS01	<p>With regard to draft Policy GSS01 (Delivering sustainable growth), Hill and Trustees are supportive of a design led approach to optimising a site's capacity. However, we would suggest that when considering comprehensive proposals for site allocations, more flexibility should be afforded with regard to density, particularly given that the London Plan 2021 has deleted the density matrix that was previously in the London Plan 2016. As such, we request the following text is added to draft Policy GSS01 (the additions are shown underlined):</p> <p><u><i>A flexible approach to density should be taken when considering comprehensive redevelopment proposals, with the optimum density of a development resulting from a design-led approach.</i></u></p>

Representor	Section	Summary of Comments
Cowing 1968 Settlement		Making this change would provide flexibility and it will ensure that the draft Local Plan is effective in its delivery and consistent with National policy.
John Lewis Partnerships	GSS01	John Lewis Partnership ('JLP') owns land within the Mill Hill East area shown on Map 3E Mill Hill East. JLP's site comprises the Waitrose store and car park, immediately to the south of the railway line, next to Mill Hill East Station. JLP's site has the potential to contribute towards meeting the housing needs of the plan, whilst retaining and improving the existing Waitrose store. Since the previous consultation on the local plan, the John Lewis Partnership has identified the site as a potential location for a mixed-use residential scheme which retains the existing Waitrose shop and therefore could contribute to housing delivery within the next five years. JLP is keen to work with the Council to develop an appropriate scheme on the site. Policy GSS01 sets out the growth strategy for delivering sustainable growth. The policy refers to new homes being directed to Growth Areas, including Mill Hill (Policy GSS07). To bolster the soundness of Policy GSS01 and the overall emerging Local Plan, Policy GSS07 and Annex 1 site allocations should be updated to reflect JLP's site in Mill Hill East. A submission is made in parallel to Policy GSS07 and Policy CDH04. The wording of Policy GSS01 does not in itself need updated, however to make the delivering sustainable growth policy and Local Plan overall more sound Policy GSS07 Mill Hill should be updated to reflect the addition of the Waitrose site and car park, 'Land South of Mill Hill East Station' should also be reflected within the Schedule of Site Proposals in Annex 1.
Landsec	GSS01	Draft Policy GSS01 directs new homes to a number of locations including 3,350 homes to be delivered along major thoroughfares. The Regulation 18 version considered 4,900 homes would be delivered along major thoroughfares. As with Draft Policy BSS01 Landsec would support the reintroduction of the target expressed in the Regulation 18 version. In addition, Landsec continue to request that the breakdown of figures for each location be expressed as a minimum in the same manner as the overall housing target is expressed as a minimum. For example, the under part e), it is requested that the policy wording be amended to read: " <i>e) Major thoroughfares – minimum of 3,350 homes (Policy GSS11)</i> ". This will retain flexibility in the policy, will maximise development potential and encourage the most efficient use of land, in line with Para 124 of the NPPF.
FORAB	GSS01	2.3.1 indicates population growth from the current around 400,000 to 452,000 by 2036. We understand current the occupancy level per home is 2.6. We recognise that with smaller homes being built occupancy levels will be lower but it is difficult to envisage that the occupancy rate for new homes will be less than 2.0. This will be especially true for market homes as prices largely dictate that affordability can only be achieved with two incomes. So for a target of 46,000 new homes occupancy is unlikely to be less than 92,000, or for the minimum target of 35,460 homes occupancy would be a minimum of 71,000. We recognise there is an element of 'hidden' homelessness that will result in numbers of such people occupying some of the new homes and thus reduce occupancy levels in existing homes. However there remains an immense disparity between an expected population growth of some 50,000 and 46,000 additional homes which, even with an average of two bedrooms, could house a minimum of 115,000 people. We appreciate the SHMA assessment provided the basis for the 46,000 homes figure, but it is poorly explained. The population growth/ new housing relationship is fundamental to the Plan. For the Plan to be sound this needs a full explanation justifying why 46,000 homes are needed.
FORAB	GSS01	The total number of homes reflects a target of 46,000 over 15 years. This figure was the working assumption in the January 2020 draft of the Plan, which itself reflected the target then in the draft London Plan. As a consequence of the recommendation following the Examination In Public the London Plan targets were reduced, with the minimum target figure for Barnet reduced to 23,640 over 10 years, which grossed up over 15 years is 35,460. Thought 35,460 is quoted in Barnet's Plan as a minimum, 46,000 remains as the objective. We find the retention of the 46,000 target odd. The London Plan EIP in effect found this target unsustainable yet Barnet has retained it. We certainly have doubts whether 46,000 is anywhere near achievable, and as we have indicated, this appears to be aimed at accommodating far more people than the projected population growth. Two figures serve to confuse, and the higher figure is unnecessary. To be sound the Plan should present a single easily understood target figure and that what is considered achievable in the London Plan – a minimum of 35,460
DTZ Investors UK Ltd	GSS01	Draft Policy GSS01 sets out the hierarchy for the distribution and location of housing, which includes Growth Areas, District Town Centres, existing and major new public transport infrastructure (including the NSOA), estate renewal and infill, major thoroughfares and "other large sites including land at Middlesex University in Hendon and car parks". The policy also states that housing growth will come forward on "small sites" (defined at para 4.8.4 as being under 0.25ha) (5,100 homes) that are not designated in the Local Plan. The Site is an excellent example of a brownfield site that is suitable for redevelopment for alternative uses. It is clearly previously developed, and it is in an accessible location with easy access to the surrounding road network. Given that it is proposed to be located within the boundary of the NSOA, it is identified as a priority location for new homes and commercial development. The Site is bounded by residential development to the north, indicating its suitability for residential development, and it is easily accessible on foot, by car and via public transport. It extends to approximately 4.64ha. It therefore has the potential to accommodate a significant number of dwellings, especially if it was to be developed for tall buildings. Given the Site's development potential DTZ supports the inclusion of the Site within the NSOA. Whilst draft Policy GSS01 identifies the NSOA as having the capacity for 250 homes, it is also an identified location for tall buildings (draft Policy CDH04). Therefore, the Site presents an opportunity to deliver a significantly larger quantum of homes than currently indicated, as well as other types of development.

Representor	Section	Summary of Comments
		<p>Opportunity Areas are defined at para 2.1.1 of the London Plan as “significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity.” In the London Plan, the NSOA is identified as an opportunity to provide 2,500 homes and 3,000 jobs. However, by comparison, Lee Valley Opportunity Area is identified to provide 21,000 homes and 13,000 jobs. The Site provides an opportunity within the NSOA to boost the number of homes and jobs that could be provided. The boundaries of the NSOA should therefore be clearly defined to provide certainty on the amount of development that could be delivered. Draft Policy GSS01 as currently worded is not effective or entirely consistent with national policy, as it fails to prioritise brownfields sites to make the most effective use of land. As such, we propose that the policy is amended as set out below, to prioritise brownfield sites for development opportunities for homes and other uses. DTZ is also supportive of the prioritisation of sites such as the NSOA for delivering homes and commercial development.</p> <p>However, as discussed above, the boundaries of the NSOA should be clearly defined within the Polices Map to provide certainty on the amount of development that can be delivered. DTZ will also engage with the emerging Area Action Plan / Planning Framework on this. These amendments would ensure that the plan is consistent with national policy, with respect to Chapter 5 of the NPPF and significantly boosting the supply of homes.</p> <p><i>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 development <u>Previously developed sites, which fall within or outside of the locations identified above, should be prioritised for development opportunities for homes and other uses.</u> 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.</i></p>
Diocese of London	GSS01	<p>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 23,300 homes in 6 Growth Areas across the Borough. While 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. Brent Cross in Barnet’s largest growth area. Included in this, is a large and complex scheme, taking over 20 years to deliver 7,900 homes. The outline planning permission, approved in 2010, is now over 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 applications to update areas of the masterplan as it evolves and as the development responds to updated market and policy shifts, particularly those arriving from the pandemic. The Government’s Housing Delivery Test (HDT) provides a measure of housing delivery based on the preceding three financial years. The Housing Delivery Test concluded that Barnet’s housing delivery is below 95% and the Council was therefore required to produce this Housing Delivery Action Plan (HDAP). While the HDAP highlights measures that Barnet is taking to improve levels of housing delivery, it demonstrates that the majority of homes are coming forward within large schemes (150+ homes). This high dependence on larger sites results in a potential risk to overall future delivery, given the broad reliance on meeting a significant proportion of the target for new homes through a small number of very large schemes. For these schemes, experience shows that they can often have more complex issues that require resolving, and these can therefore have the potential for significant delays. Furthermore, the HDAP focuses on the 2019/20 financial year i.e. the period before the COVID 19 lockdown. The impact of the lockdown on housing delivery is a national issue. Local Plan’s will need to ensure that their housing need is robust enough to withstand the impact on potential delays to housing delivery caused by the Covid 19 lockdown. 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. Furthermore, the variety of housing types brought about by delivering more houses, would protect the Council from housing delivery issues. Smaller Sites 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 states that where an allowance is to be made for windfall sites 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 a variety of sites will need to come forward and play a role in housing delivery. However, the Council fail to justify this figure. This figure appears to be arbitrarily set and therefore cannot be considered a reliable source of realistic housing delivery. This is further supported by the London Plan Examiner’s Report which did highlight the uncertainty of the delivery of small sites.</p> <p>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 to ensure that there is a varied and realistic level of sites which can come forward to provide housing throughout the district.</p>

Representor	Section	Summary of Comments
Barratt London	GSS01	<p>Policy GSS01 sets out that new housing development will be delivered through a number of different components of supply, with the delivery of new homes mostly being located in 6 Key Growth Areas. Para 16.6.1 defines Growth Areas as "distinctive locations with good public transport accessibility. They have a supply of brownfield and underused land and buildings that offer opportunities for inward investment". Whilst the former West Hendon Estate forms part of the Estate Renewal and Infill Strategic category at Policy GSS01(d), it is considered that West Hendon Estate should be its own stand-alone growth area given that it too is a distinctive location overlooking the Welsh Harp and with good public transport accessibility, that has and will provide substantial capacity for new homes and jobs. West Hendon is one of the Council's Key Priority Housing Estates for Regeneration under the currently adopted Barnet Local Plan (Core Strategy, 2012). The 2004 London Plan previously identified Cricklewood/Brent Cross/West Hendon as an Opportunity Area with the potential to provide a minimum of 10,000 new homes. A planning framework for the Opportunity Area was subsequently prepared jointly by London Borough of Barnet and the Mayor. The Council adopted it as Supplementary Planning Guidance (SPG) in April 2004 and the Mayor subsequently adopted it as his Opportunity Area Planning Framework in December 2005. The SPG, which has not been superseded, identifies the former West Hendon Estate as the "West Hendon Residential Quarter and Local Centre". Hybrid planning was granted in 2013 for the demolition and redevelopment of the Estate to accommodate up to 2,000 homes in buildings ranging from 2 to 29 storeys as well as associated landscape and highway works, and the provision of two new pedestrian bridges across the Welsh Harp. This forms a baseline for redevelopment but in line with London Plan policies, there is an expectation of site optimisation where this can be supported through a design led approach. The history to the Site as well as its' SPG status is an important material consideration which reaffirms the position that West Hendon should be its own stand-alone growth area. Policy GSS01(a) should therefore be amended to include a new bullet point after bullet point 6:</p> <ul style="list-style-type: none"> • West Hendon Estate – Minimum 2,000 homes (Policy GSS10)" Barnet's Growth Areas which are shown on Map 2 'the Key Diagram' should be updated to reflect the inclusion of the West Hendon Estate. In addition, the West Hendon Estate should also be included as a key Growth Area in respect to para 4.8.2. Minimum Targets - 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 Borough justifies maintaining a lower minimum housing target, then we continue to urge that 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. It is acknowledged that Policy BSS01 establishes the minimum borough wide housing target. However, this aspiration for the housing target to be exceeded where appropriate is not implicit within emerging policy GSS01. Given the pressing need for housing delivery, this policy 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 London Plan's emphasis upon site capacity being based on design-led optimisation. The figure expressed in its current form suggest rigidity rather than flexibility. The Secretary of State in his directions to the Mayor of London including the 13th March 2020 informed the Mayor that housing targets should be minimums: "Your Plan must be brought to the minimum level I would expect to deliver the homes to start serving Londoners in the way they deserve." Under Section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004 there is a legal requirement that all development plan documents must be in general conformity with the London Plan.
Hendon Goods Yard Village Ltd	GSS01	<p>Para 5c Acknowledging the NPPF ('NPPF; 2021) Para 105 which states that 'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel', our client considers that the strategy included under Draft Policy GGS01 is sound. This includes 'further intensification around Hendon Station' in delivering sustainable development, which also supports policy objectives of the London Plan (2021) (Policy GG2 'Making the best use of land') which local plans in Greater London are required to be in general conformity with. On this basis, our client wishes to highlight the suitability of previously developed land adjacent to Hendon station (known as the Hendon Goods Yard) for high-density housing – which would actively support this policy objective and the NPPF Para 120 which states that 'planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes... alongside supporting the development of under-utilised land, especially if it would meet an identified need where land supply is constrained'. The site's connectivity is also set to further increase through the introduction of the West London Orbital (WLO) and Crossrail 2, further supporting transformation in the Hendon area and the delivery of sustainable growth.</p>
Brent Cross South Limited Partnership ('BXS LP'),	GSS01	<p>Part (a) of this policy should refer to 'Brent Cross Growth Area' rather than the OA. See also comments above regarding housing numbers.</p>
Berkeley Group (on behalf on St James Group Limited/St	GSS01	<p>As stated at Regulation 18 stage, the general approach to delivering sustainable growth by focussing development within growth areas, district town centres and around transport hubs is supported and the presumption of brownfield first is fully supported. Notwithstanding this, it is noted that the expected new homes delivery as set out in Table 5, indicates a very small proportion of overall housing growth to occur within district town centres. Draft policy BSS01 sets a figure for the Borough to achieve a minimum of 35,460 new by 2036; whilst it is understood that this is a minimum target, to ensure draft policy BSS01 meets the soundness tests of the NPPF this figure should reflect the minimum 46,000 as set out in draft policy GSS01 and which is based on the evidence</p>

Representor	Section	Summary of Comments
William Homes LLP)		<p>base, the SHMA (2018). 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. As set out in our response to previous consultations, the 2018 SHMA figure has not followed the Government's standard methodology for calculating local housing need. Table 4 of the draft Local Plan indicates that if this was applied, Barnet's OAN would be 5,361 homes per annum / 80,415 homes across the plan period. Para 61 of the NPPF (2021) states that 'To determine the minimum number of homes needed, 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.' 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. From the 2021 figures published, Barnet has failed to meet the Housing Delivery Test during the last 3 years and is required to complete an Action Plan as a consequence. The current draft Local Plan does not provide an indication of how the backlog of delivery is incorporated into the housing figures. Given the above, the housing targets are considered inconsistent with national policy and the OAN is questioned. On this basis, the plan has been not been positively prepared, current housing figures are not justified and therefore the plan fails a number of the soundness tests as set out in the NPPF. In draft policy GSS01, the Council sets a reliance on small sites, para 4.8.4 of the draft Local Plan states that '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.' Draft Policy GSS01 goes on to note 'Housing growth will come forward on small sites (5,100 homes) that are not designated in the Local Plan', therefore these will all be windfall. Currently, it is not clear where this figure, which equates to 11% of the total housing target, is derived from. The NPPF indicates in para 71 that 'where an allowance is made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply.' Current evidence does not support the numbers attributed to small sites, rendering the Local Plan unsound on this basis. In terms of where new homes are to be located, St William generally supports the spatial strategy, which directs development to brownfield sites, primarily within growth areas and town centre areas; however, the 5,100 new homes to come forward on small sites is not only 'unjustified' (as indicated above), it is disproportionate to the 5,400 expected to come forward within District Centres. It is considered that the Plan over relies on small windfall sites to meet housing targets, whilst under estimating the number of homes that could come forward within accessible and sustainable sites located in district town centres. On this basis, the Plan is not positively planned, justified or consistent with the NPPF. The NPPF places an emphasis on the efficient and effective use of brownfield sites. The London Plan also seeks to optimise potential of suitable brownfield sites particularly those that are accessible and sustainable, including those located within town centre areas. With this in mind, as well as the issue of over reliance on small windfall sites, the council should work more closely with land owners so that the town centre figures can be increased to ensure that housing in these locations is optimised in line with both regional and national policy. The former gas holders site at Albert Road is an example of an accessible site located within the town centre where housing should be optimised. As a minimum, the Plan needs to emphasise that the 5,400 homes expected to be delivered in district centres is 'an absolute minimum' and that development in these locations should be optimised where possible. The draft Barnet local plan indicates that Town Centre Frameworks/SPD's will provide the basis for promoting positive change in town centres and ensure regeneration gets underway. The Plan should make clear that these will seek to optimise housing numbers within town centre locations. Within such frameworks or guidance, where the council wish to promote a mix of uses on a site, the need of any non-residential floorspace should be justified by robust evidence so that development viability is not undermined and to ensure site deliverability. To ensure compliance with the soundness tests of the NPPF, this point on evidenced need for non resi uses should be included in policy preamble supporting draft policy GSS08 (ref point e) and be included within wording of draft policy CW01.</p>
Mactaggart and Mickel Homes	GSS01	<p>The Council should be proactively supporting sustainable development to deliver a significant boost to the supply of housing to meet identified housing needs as set out in the NPPF. In delivering this, the NPPF expects strategic policy-making authorities to follow the standard method within the National Planning Policy Guidance for assessing local housing need, unless exceptional circumstances justify an alternative approach. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. As confirmed in Para 4.4.2 of the Barnet Draft Local Plan (Reg 19) 2021 to 2036 the most up-to-date standardised methodology confirms a requirement for a minimum of 5,361 homes per annum (or 80,415 homes in total). This is stark contrast to that proposed by the Council at 2,364 homes per annum (or 35,460 homes in total). This is a 56% shortfall year-after-year. Given the London Borough of Barnet are proposing a lower housing need figure than that identified using the standard method, the Local Planning Authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. Mactaggart & Mickel do not consider that exceptional circumstances do apply. Conversely, the London Borough of Barnet is positioned in Greater London; it has a high level of existing and planned infrastructure (the West London Orbital; Brent Cross West Station, and the potential for Cross Rail 2); has a high proportion of brownfield sites available and has significant pressures for affordable homes. It should also be noted that the London Plan is only able to establish housing requirements for</p>

Representor	Section	Summary of Comments																																										
		<p>10 years from the period 2019 / 2020 – 2028/2029. After this point, the land supply position is uncertain. It is anticipated that a new London Plan will be adopted before the end of this period and will establish a new housing need / requirement. As such, the emerging Barnet Local Plan should make this clear. Mactaggart & Mickel believe that not only is the London Borough of Barnet not planning to meet its housing needs in full, but also has also underdelivered for the last 20 years. Historical housing completions are shown at Figure 1 (overleaf). It provides information from 2000 / 2001 and 2019 / 2020 and confirms that the average rate of delivery has been only 1,348 homes, which based on the current standard method requires a step-change of almost 300%.</p> <p>Figure 1 – Historical Housing Delivery in the London Borough of Barnet</p>  <table border="1" data-bbox="465 316 1317 874"> <thead> <tr> <th>Year</th> <th>Homes</th> </tr> </thead> <tbody> <tr><td>2000/01</td><td>1264</td></tr> <tr><td>2001/02</td><td>389</td></tr> <tr><td>2002/03</td><td>804</td></tr> <tr><td>2003/04</td><td>1766</td></tr> <tr><td>2004/05</td><td>1306</td></tr> <tr><td>2005/06</td><td>1233</td></tr> <tr><td>2006/07</td><td>1329</td></tr> <tr><td>2007/08</td><td>1418</td></tr> <tr><td>2008/09</td><td>1381</td></tr> <tr><td>2009/10</td><td>1496</td></tr> <tr><td>2010/11</td><td>1139</td></tr> <tr><td>2011/12</td><td>1469</td></tr> <tr><td>2012/13</td><td>1409</td></tr> <tr><td>2013/14</td><td>1081</td></tr> <tr><td>2014/15</td><td>1464</td></tr> <tr><td>2015/16</td><td>1735</td></tr> <tr><td>2016/17</td><td>2227</td></tr> <tr><td>2017/18</td><td>2360</td></tr> <tr><td>2018/19</td><td>2230</td></tr> <tr><td>2019/20</td><td>2009</td></tr> </tbody> </table>	Year	Homes	2000/01	1264	2001/02	389	2002/03	804	2003/04	1766	2004/05	1306	2005/06	1233	2006/07	1329	2007/08	1418	2008/09	1381	2009/10	1496	2010/11	1139	2011/12	1469	2012/13	1409	2013/14	1081	2014/15	1464	2015/16	1735	2016/17	2227	2017/18	2360	2018/19	2230	2019/20	2009
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TFL (Commercial Development)	GSS01	<p>TfL CD supports directing housing growth to the Growth Areas (including Colindale, Edgware and Mill Hill), District Town Centres (including Finchley Church End), at existing and major new public transport infrastructure and at other car parks. In the context of the current borough housing target in the recently adopted London Plan, we are generally supportive of the housing targets for the Growth Areas, District Town Centres, and Existing and Major New Public Transport Infrastructure (subject to our comments below on developing at TfL stations and environs including car parks). However, as above, we consider that the housing targets should be expressed as minima, ie. a) <i>Growth Areas (at least 23,300 homes)</i>: We consider that the indicative capacity of <i>at least</i> 5,000 new homes at Edgware (where TfL CD is partnering Ballymore to bring out transformative change in the town centre) is achievable. We are also happy with the figure of <i>at least</i> 4,100 new homes at Colindale, which we assume to include the 313 new homes granted planning permission at Colindale Station in 2020. And likewise <i>at least</i> 1,500 new homes at Mill Hill which we assume to include the min 127 new homes in Site Proposal No. 47. We note the reduction in capacity for District Town Centres from 6,100 in the Reg 18 version of the Draft Local Plan to 5,400 in the Reg 19 version. The Council will need to ensure that the reduced figure still optimises opportunities for the delivery of housing in these highly sustainable locations. We also note, with some concern, the significant reduction in capacity for “<i>London Underground and Network Rail stations and environs, including car parks</i>” – from 1,000 new homes in the Reg 18 draft to just 450 in the Reg 19 draft. The development of such sites will not only regenerate and make much better use of this under-used, brownfield land, but will also help to encourage more sustainable and active transport choices in the most accessible locations, in accordance with the Mayor’s Transport Strategy (MTS) and London Plan eg. policies SD7 (Town centres: Development Principles and Development Plan Documents) and H1 (Increasing Housing Supply). We consider that the Reg 19 version of the draft Local Plan underestimates the capacity of these sites. We calculate that our car park sites in the borough have the capacity to deliver a greater number of new homes over the lifetime of this Local Plan. Based on the draft Reg 19 Local Plan Annex 1 Site Proposals figures, TfL’s “stations and environs, including car parks” have the potential to deliver a minimum of:</p>																																										

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		<table border="1"> <thead> <tr> <th>Site No.</th> <th>Site</th> <th>Indicative homes</th> </tr> </thead> <tbody> <tr> <td>24</td> <td>East Finchley Station Car Park</td> <td>135</td> </tr> <tr> <td>28</td> <td>Edgware Underground and bus stations</td> <td>2,317</td> </tr> <tr> <td>30</td> <td>Finchley Central Station</td> <td>556</td> </tr> <tr> <td>44</td> <td>High Barnet Station</td> <td>292</td> </tr> <tr> <td>47</td> <td>Mill Hill East Station</td> <td>127</td> </tr> <tr> <td>53</td> <td>Alum Way</td> <td>600 (assume up to 200 could be collocated with transport infrastructure on TfL land)</td> </tr> <tr> <td>55</td> <td>Woodside Park Station East</td> <td>95</td> </tr> <tr> <td>56</td> <td>Woodside Park Station West</td> <td>356</td> </tr> <tr> <td>-</td> <td>Colindale Station, car park and adjoining land</td> <td>313</td> </tr> <tr> <td></td> <td>TOTAL</td> <td>4,391</td> </tr> </tbody> </table> <p>Over the lifespan of the draft Local Plan, this may be an underestimate as there is also potential for new homes at other sites in TfL's portfolio such as Golders Green station (see below). However, this demonstrates the estimated capacity for housing delivery on TfL sites comprising "London Underground stations and environs, including car parks". Even if we account for potential double counting by discounting the station / car park sites in Growth Areas (ie. Edgware Underground and bus stations, Colindale Station and Mill Hill East station) and District Town Centres (ie. East Finchley Station car park and Finchley Central station), the highlighted sites in the table above could deliver 943 new homes. We do not know the capacity of Network Rail sites, which would also need to be added, but we suspect it may take the total to above 1,000. As the draft Reg 19 Local Plan underestimates housing delivery on these sites, we consider that the figure of 450 homes does not optimise housing delivery on highly sustainable sites. It should remain as at least 1,000 homes as previously specified in the Reg 18 draft. We look forward to continuing to work with the Council in order to realise the true potential of these sites. TfL CD continues to support the development of 'small sites' and our scheme at Beechwood Avenue should be completed shortly to provide 97 new homes. We also have a number of other 'small sites' in the borough, including on the North Circular which will reinstate homes on derelict sites, therefore improving the environment and townscape, as well as providing much-needed additional family homes.</p>	Site No.	Site	Indicative homes	24	East Finchley Station Car Park	135	28	Edgware Underground and bus stations	2,317	30	Finchley Central Station	556	44	High Barnet Station	292	47	Mill Hill East Station	127	53	Alum Way	600 (assume up to 200 could be collocated with transport infrastructure on TfL land)	55	Woodside Park Station East	95	56	Woodside Park Station West	356	-	Colindale Station, car park and adjoining land	313		TOTAL	4,391
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Barnet Society Committee	GSS01	Clarification is needed as to whether (1) in para 1, the 27,000 new jobs are net or gross, and (2) in para 5, why the list of areas totals an unrealistically ambitious 46,200 new homes when the New London Plan target is 35,460. We also support the views submitted by the Federation of Residents' Associations of the London Borough of Barnet (FORAB). Clarify the basis of (1) & (2) above.																																	
Ropemaker Properties Ltd	GSS01	GSS01 is a strategic policy aimed at delivering sustainable growth through inter alia directing new homes to the most sustainable locations. These are set out in parts a) – f) of the policy. Part c) refers to existing and major new public transport infrastructure and recognises the potential for the WLO to support further intensification around stations at Cricklewood, Hendon and Brent Cross West. A combined figure of 950 homes is allocated across these areas. However no specific sites have been identified to deliver these 950 homes. Both Cricklewood and Brent Cross West stations are also located in designated Growth Areas which are referred to under part a) of the Policy. On the basis that there must be no double counting to achieve the BSS01 target, this implies that all 950 homes are to be delivered in proximity to Hendon station. Annex 1 of the draft BLP (Reg 19) identifies the proposed allocation at Sainsbury's The Hyde (i.e. the Silk Park site) as a 'Major Thoroughfare' site. The only other proposed allocation in the vicinity of Hendon railway station is Philex House (again under the 'Major Thoroughfares' category) which is allocated for 48 homes. Policy GSS01 should allocate the Garrick Industrial Centre as an LSIS with potential for co-location with residential and other uses (in accordance with London Plan Policies E6 and E7) and should be clearly defined as such on the Proposals Map.																																	
TFL (Spatial Planning)	GSS01	The wording in relation to new public transport infrastructure has been amended from the Reg. 18 draft and suggests there is now more certainty about delivery of West London Orbital than is actually the case. Although work is continuing there is still uncertainty about funding and timescales for delivery and so we suggest it is altered to read as follows 'Major new public transport infrastructure is delivered at the new Brent Cross West station and as part of a potential West London Orbital rail line, with longer-term potential for Crossrail 2, subject to confirmation.' In view of the above, the assessment of potential for new homes at existing and major new public transport infrastructure in part c should take account of the possibility that there could be delays to delivery of the named transport projects. There may be additional scope to develop in and around existing stations while not being dependent on the delivery of specific projects.																																	
Hurricane Trading Estate	GSS01	We strongly support the Council's policy objective to create the conditions for sustainable growth to deliver the homes, jobs, retail floorspace and community facilities to meet Barnet's identified needs, in accordance with Para 11 (b) of the NPPF (NPPF) (2021). Specifically, the policy sets out that 23,300 new homes will be directed to 6 identified locations. These locations include Colindale, which has capacity for 4,100 homes over the plan period between 2021																																	

Representor	Section	Summary of Comments
		and 2036. In accordance with Policy D3 (“Optimising Site Capacity through the Design-led Approach”) of the London Plan, draft Policy GSS01 advocates that development must make the best use of land by following a design-led approach that optimises the capacity of sites, ensuring that development is of the most appropriate form and land use for the site. We support this approach, in accordance with London Plan Policy D3.
Clarion Housing Group and the Huntingdon Foundation	GSS01	<p>The Draft Local Plan identifies a housing need for Barnet of 35,460 new homes (2,364 per annum, London Plan 2021 target) over the Plan Period from 2021 up to 2036, while providing a supply of sites for up to 46,000 new homes (3,060 per annum) which is based on the Objectively Assessed Need for Housing as identified in Barnet’s SHMA 2018. Policy GSS01 and Table 5 set out how the housing targets will be met. The strategy outlined in Policy GSS01 and Table 5 is not sound in the context of NPPF (2021) Para 35 as it is over reliant on large and complex urban regeneration sites. The proposed strategy for meeting housing need is overly optimistic and not effective as it is over-reliant on complex urban regeneration sites. It is not justified as there is insufficient evidence provided that these large urban regeneration sites will deliver in the required timescales. This issue has previously been acknowledged in Barnet’s Housing Delivery Action Plan (2020) which states that a ‘high dependence on larger sites results in a potential risk to overall future delivery, given the broad reliance on meeting a significant proportion of the target for new homes through a small number of very large schemes’. For example, the Brent Cross Growth Area is proposed to deliver 9,500 homes by 2036. Section 4.15 of the draft Local Plan notes that the development of the Brent Cross Growth Area is dependent on factors relating to land ownership, viability and phasing. The existing outline planning application was approved in 2010 and will need to be supplemented through further planning applications to update areas of the masterplan. The size, complex history and landownership arrangements of this site make it difficult to guarantee that 9,500 homes will be delivered by 2036 and sufficient evidence is not provided to justify this. At Edgware Town Centre, 5,000 new homes are expected to be delivered by 2036, with 3,350 of these by 2031. However, the Council has not yet received any development proposals for this site and does not indicate that they have had discussions with developers or landowners. There could be complex issues to do with landownership, viability or previous uses of the site which may delay delivery and these do not appear to have been sufficiently assessed. Therefore, insufficient evidence is provided that 3,350 homes will be delivered in Edgware Town Centre in the next ten years, and 5,000 by 2036. The two examples above indicate that the reliance on large sites in the draft Local Plan is not justified nor is the plan sound in regard to NPPF (2021) Para 35.</p> <p>The strategy of seeking to achieve the Borough’s housing target by relying on large strategic sites is highly aspirational and ambitious. Para 16 of the NPPF (2021) states that plans should be ‘prepared positively, in a way that is aspirational but deliverable’ and one of the key tests for soundness is that the plan should be effectively and deliverable over the plan period (Para 35). There is no evidence presented to provide clarity or certainty that the large strategic sites would deliver the quantum of homes required over the plan period. In order to make the plan sound, mixed-use redevelopment of available sites and previously developed land across the Borough and in particular on sites in Growth Areas and Opportunity Areas. For example, the Nos. 20-130 Colindeep Lane site is suitable for redevelopment and could deliver a number of new homes that would substantially contribute towards meeting the Borough’s housing target over the plan period in the shorter term. The Draft Local Plan should set out an alternative scenario that isn’t solely based on large strategic sites but also allocates a range of small and mid-size sites suitable for redevelopment; such as Nos. 20-130 Colindeep Lane. In order to achieve a sound strategy, the Council need to allocate more small/ medium sized, available and deliverable sites that could deliver homes in the short to medium term, until the larger, complex regeneration sites deliver housing on a regular basis. This would ensure that a five-year housing land supply is in place, and provide other benefits such as the earlier provision of affordable housing. The following additional criteria should be added to Draft GSS01: <i>“g) Other developed sites suitable for mixed-used redevelopment that have the potential to optimise the use of the land and to deliver new homes and job opportunities”</i>.</p>
New Barnet Community Association	GSS01	<p>The basic premise of policy GSS01 is that it is ‘Sustainable’. However, the number of homes detailed in the policy amounts to 45,700 which suggests a population increase of close to 90,000 based on the requirement of at least two incomes to be able to afford the new homes being built (other than social housing). With the requirement for 90,000 income generators, one would expect a similar number of new jobs to be created in order to make the developments ‘sustainable’. While the Brent Cross growth area is identified as generating 27,000 jobs, there remains a high degree of uncertainty in the post covid world that demand for the volume of planned new office and retail space will be sufficient to meet this employment target. Even if that target is met it means that there will be a significant shortfall between the jobs created and the number of new income generating residents to the borough which will increase the levels of commuting outside the borough. This will have a significant environmental impact, either by increasing road usage (car and bus) or additional pressure on underground and rail networks. The Employment Land Review identifies the pressure on employment land and how this is being eroded in favour of housing development yet there are very few measures to protect employment land from housing development and Policy ECY01 allows this to take place so long as a financial contribution is made. Given residential values will always exceed employment land values the reduction in employment land will only continue unless strong policies are in place. The London Plan makes the distinction of “Good Growth” recognising the importance of affordable workspace, and culture and leisure facilities as part of the growth strategy which should be socially and economically inclusive and environmentally sustainable. This should be replicated in the Local Plan. As a policy principle, the local plan should ensure that the number of new homes is matched by job creation within the borough and that there should be proactive policies to attract new employers into the borough. Sites such as the North</p>

Representor	Section	Summary of Comments
		London Business Park could have been developed as technology hubs attracting in technology and supporting industries with high value employment. Instead they will provide homes for commuters who will place much greater pressure on the transport infrastructure. GSS01 must include a clear balance between housing and employment land and ensure that job creation is included as a key component of sustainable growth.
Haringey Council	GSS01	We welcome Policy GSS01 Delivering Sustainable Growth which states that infrastructure is key to supporting growth in Barnet, including investment in transport, education, health and open spaces. We also welcome the identification of major transport infrastructure upgrades in Policy GSS09 Existing and Major New Transport Infrastructure which are expected to be delivered in Barnet over the plan period and will support growth and development in the borough. Barnet's draft Infrastructure Delivery Plan (IDP), published in January 2021, identifies infrastructure needs to support future growth of 46,000 new homes over the next 15-year period. The IDP identifies Barnet's infrastructure needs comprehensively while highlighting some uncertainties around funding from Government departments that may affect how planning for future provision is considered. We particularly note Barnet's commitment to maintain strong relationships with transport providers to ensure that when provision issues are identified, steps can be taken to help delivery to ensure that growth can be delivered in a sustainable manner.
Environment Agency	GSS01	Policy GGS01 and the preamble explain that use of brownfield land and areas of good public transport provision have been key factors when selecting the Growth Areas and associated site allocations. It still remains unclear to us how the Borough have applied the flood risk Sequential Test to their spatial strategy and choice of site allocations in accordance with para 157 of the NPPF (NPPF). This also indirectly relates to NPPF paras 149, 155 and 156 which stipulate taking a pro-active approach to manage the long-term impacts of flood risk and directing development away from the areas of highest risk (informed by a Strategic Flood Risk Assessment (SFRA)). We can see no evidence of the Sequential Test, and the references throughout the Local Plan only mention the Sequential Test in relation to planning applications (alongside Flood Risk Assessments) when the point has really been missed that this is a test that should also be applied strategically by a Local Planning Authority to their Local Plan. We highlighted the requirement to apply the Sequential Test at the regulation 18 stage. We also brought to the Borough's attention the limitations of the Site Selection Methodology which only references flood risk as a limiting factor in that there might be ways to mitigate the impacts. The flood risk Sequential Test is not asking Local Authorities to consider whether flood risk can be mitigated, its aim is to steer new development to the lowest risk of flooding, i.e. not allocate development in areas of high risk if there are reasonably available sites in areas of lower risk of flooding. Although the Local Plan references the SFRAs as supporting the plan, there appears to be an assumption that the SFRA is the Sequential Test. They are not. The SFRAs provide the baseline information upon which the Local Authorities apply the Sequential Test. Of the 67 sites, 8 are at risk from medium to high fluvial flooding. We still have major concerns regarding 2 of these sites which are set out in separate representations. When considering the overall number of sites, the Local Authority has managed to achieve a general majority in areas of lowest fluvial risk, however, the fact remains it is still not explicit or clear enough how you've taken flood risk into account when making these selections and choices. It needs to be obvious to us and the Planning Inspector that the ST has been applied by (a) submitting evidence and (b) ensuring there commentary throughout the Local Plan that indicates you have done this. The Planning Practice Guidance suggests various options of how the Sequential Test can be demonstrated, e.g. as part of the Sustainability Appraisal, a free standing document or as part of the Strategic Housing Land Availability Assessment. We can't find this evidence in your Site Selection Background Report or your Integrated Impact Assessment (IIA). For the 8 sites at risk from fluvial flooding (plus sites at risk of surface water flooding) it needs to be clear why other sites at lower risk previously considered where not available/suitable. The IIA objectives can also help in determining whether there are wider sustainability objectives that outweigh flood risk (if there are no reasonably available sites at lower risk). The lack of Sequential Test evidence means that currently the Local Plan is not justified i.e. an appropriate strategy, which has considered alternatives, based upon proportionate evidence. Policy GSS01 does state the Boroughs approach to windfall sites in that: 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. We do support this as it aligns with the aims of Para 157 of the NPPF, and it will also support decisions taken at the planning application stage. We note our recommendations at the regulation 18 stage were not taken into account, specifically our comment that delivering sustainable growth will also require provision for environmental infrastructure such as flood risk, waste water and green infrastructure. Although the policy is only citing examples in the top para, we think the omission is not sound, as it is not positively prepared (meeting the boroughs unmet needs and delivering sustainable development) and not in accordance with aims of para 20 (b) and 149 of the NPPF. The modifications that are necessary to address our concerns are as follows: a) The Borough needs to provide evidence (preferably a free standing document) that sets out how the Site Allocations at risk of fluvial flooding (and surface water) have passed the Sequential Test. There are examples of how other Local Authorities have produced a Sequential Test. However, please note our representations to sites 6 and 9. b) Once the Sequential Test has been applied, make suitable reference to this as part of the preamble and within Policy GSS01 and in other appropriate sections of the Local Plan so it is clear that 'flood risk' has been a factor in the spatial decisions of the plan e.g. the selection of suitable sites and that alternative options have been properly considered before selecting sites at high risk of flooding. c) Policy GSS01 should be amended as follows in line with the request we made at the regulation 18 stage to acknowledge that flood risk, waste water, drainage and green infrastructure is also part of the infrastructure that will be required to meet Barnet's

Representor	Section	Summary of Comments
		<p>identified needs: 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, flood risk, waste water, drainage and green spaces.</p> <p>We will continue to support the Borough and provide Sequential Test advice. The evidence and modifications to the plan can be agreed prior to submission of the Plan. However, we are available to attend the hearings if necessary.</p>
Ballymore Group and TFL Commercial Development	GSS01 GSS05	<p>Policy GSS01 states that new homes will be directed to a number of Growth Areas including Edgware Town Centre where the target is 5,000 new homes. This is amplified in policy GSS05 which sets out the Council's requirements for development proposals in the Edgware Growth Area and which includes the target of 5,000 new homes. We support this ambition for growth in the borough and consider this target to be both deliverable and consistent with the Council's ambitions as set out in the adopted Edgware Growth Area SPD. We welcome the Council identifying Edgware Town Centre as an opportunity for regeneration and intensification and the importance placed on enabling economic recovery from the impacts of the COVID-19. However, following the Government's publication of the new Standard Methodology for calculating housing need which applies a cities and urban centre uplift for cities including London, we can reasonably anticipate an increase to Barnet's housing targets within the plan period. This new Standard Methodology will increase the borough's housing target to over 5,000 units per annum from its current 2,364 units per annum. Therefore, draft Policies GSS01 and GSS05 should be appropriately worded and introduce flexibility to its application by presenting housing figures as minimums as suggested below. This approach maximises the Council's ability to achieve its housing target by relying on its plan to govern housing delivery, whilst ensuring the Local Plan is effective in its delivery throughout the plan period.</p> <p>Policy GSS01 – suggested change</p> <p>a) <i>Growth Areas (at least 23,300 homes):</i></p> <ul style="list-style-type: none"> • <i>Brent Cross Cricklewood Opportunity Area – at least 9,500 homes (Policy GSS02)</i> • <i>Brent Cross West – at least 1,800 homes (Policy GSS03)</i> • <i>Cricklewood Town Centre – at least 1,400 homes (Policy GSS04)</i> • <i>Edgware Town Centre – at least 5,000 homes (Policy GSS05)</i> • <i>Colindale Opportunity Area – at least 4,100 homes (Policy GSS06)</i> • <i>Mill Hill – at least 1,500 homes (Policy GSS07)</i> <p>Policy GSS05– suggested change</p> <ul style="list-style-type: none"> • <i>To deliver growth and regeneration at Edgware Town Centre, the Council will seek the following from development proposals: At least 5,000 new homes;</i>
Brad Blitz	GSS01 GSS08 GSS12 CDH08 CDH01 ECC06	<p>In several places the draft Local Plan Reg. 19. mentions ultra vires sources, e.g. the 'Emerging Burroughs and Middlesex University SPD' (See pp. 340-350). This SPD was unlawfully approved by the LB Barnet Policy and Resources Planning Committee on 20 July 2021. Other supporting documents contain factual inaccuracies (e.g. Integrated Impact Assessment for Barnet's Draft Local Plan (Reg 19) May 2021) or multiple omissions e.g. (Key Facts Evidence Paper). Further, there were problems with the consultation process over the Draft Local Plan (Reg. 18), as noted in communication to the Aarhus Convention Compliance Committee (ACCC/C/2021/185).</p> <p>Specifically, we note that:</p> <ol style="list-style-type: none"> i) all local authorities should abide by Local Government Association (LGA) guidelines, including recommendations that consultations should last up to 12 weeks, unless in exceptional circumstances when the consultation period should be extended. ii) On 27 January 2020, the LB Barnet initiated a consultation over its Draft Local Plan for the entire borough, which included its vision for growth and development over a 15-year period (2021-2036). In order to comply with its requirement of public consultation, the LB Barnet left one hard copy of the document provided in concealed folder in the Hendon public library. iii) On 10 February 2020, the UK government introduced with immediate effect the Health Protection (Coronavirus) Regulations 2020. These imposed restrictions on any individual considered by health professionals to be at risk of spreading the virus. iv) On 11 February 2020, the Secretary of State for Health, reminded the public of the advice to remain in doors for 14 days if they developed symptoms of COVID-19. v) On 25 February 2020, the Secretary of State declared that the incidence or transmission of novel Coronavirus constituted 'a serious and imminent threat to public health', and stated that the measures outlined in these regulations were considered 'an effective means of delaying or preventing further transmission of the virus'. vi) On 1 March 2020, the Secretary of State set out a Battle Plan, including advising the public to remain and work from home.⁸

Representor	Section	Summary of Comments
		<p>vii) On 3 March 2020, the UK Prime Minister Boris Johnson introduced an 'action plan', including advising more people to work from home.⁹</p> <p>viii) On 12 March, the UK Prime Minister advised that the UK was 'moving out' of contain phase and into delay. He advised that all with symptoms should self-isolate and warned that a national lockdown was approaching.</p> <p>ix) 16 March 2020, the UK government published industry guidance including asking people to self isolate for 7 days if they feel unwell.</p> <p>x) On 16 March 2020, the LB Barnet consultation closed, after the Secretary of State for Health called for 'unnecessary social contact' to cease.</p> <p>Further, the LGA document, LGA Conversations – New Guide to Engagement, sets out models for 'good engagement', in particular, to foster partnership, and allow residents to be informed contributors to the decision-making process. The HM Code of Practice on Consultation lists seven criteria for managing consultations, including i) when to consult; ii) the duration of the consultation exercise, iii) clarity of scope and impact; iv) accessibility of consultation exercises; v) the burden of consultation; vi) responsiveness of consultation exercises; and viii) capacity to consult. The HM code also recommends a 12-week period under normal circumstances. 'If a consultation exercise is to take place over a period when the consultees are less able to respond e.g. over the summer or Christmas break, or if the policy under consideration is particularly complex, consideration should be given to the feasibility of allowing a longer period for the consultation.' With respect to the Local Plan Reg18 AND Reg19 consultation exercises, the above criteria have not been satisfied by Barnet Council.</p>
Brad Blitz	GSS01 GSS08	<p>With respect to Hendon, the Local Plan Reg. 19 should be modified to: Protect the Burroughs and Church End conservation areas from unsympathetic development, by reducing the scale, size, and massing of the proposed new student accommodation/residential homes in this highly residential area. The number of student living spaces (1700) needs to be sharply reduced and new dorms should be built on Middlesex University's footprint.</p> <p>Reject proposals to alter the listed Hendon Library Building, including both the exterior, interior and roof.</p> <p>Remove the proposed demolition of 3 Egerton Gardens from the plans for Hendon - Remove the proposed demolition of 28-30 Church End from the plans for Hendon - Remove the Burroughs Car Park and the Burroughs Gardens carparks from the Local Plan Reg 19. These should be soft landscaped and left for residents living in the more than 20 listed buildings on the Burroughs – recognising that the owners who moved into those heritage homes did so with the understanding that there was parking available to them.</p>
Brad Blitz	GSS01 GSS08 CDH08 CDH01	<p>I am a long-term resident and live within one of the conservation areas that will be affected by the proposed developments. Since January 2021 I have alerted Barnet to the improper way in which consultations over the redevelopment scheme have been conducted. This includes unlawful actions, which I identified by letter, and in a complaint submitted to the Aarhus Convention Compliance Committee (28 February 2021), when it was clear that our rights to participation in the SPD consultation were being violated. LB Barnet has further withheld significant information from residents, which has hampered the process of effective consultation including over the Local Plan Reg. 19. I note that as of 8 August 2021, just as we are asked to provide specific references to policies, paras, and figures/tables, LB Barnet has failed to post each of the policies listed in the Local Plan on its website. They are simply not available for scrutiny. I have read many of these policies, but do not have all to hand, so cannot at this point indicate the exact places where the Local Plan Reg. 19 is not legally compliant, and is unsound, and where it violates the duty to co-operate. I can do so however in order to assist the inspector and believe it is necessary to participate in the examination hearings. I have also been in regular contact with Historic England and Save Britain's Heritage.</p>
Mill Hill Missionaries	GSS01 Part A	<p>GSS01, Part A, of the Draft Local Plan states the Council will direct 23,000 new homes at Growth Areas across the Borough including Brent Cross Cricklewood, Colindale and New Southgate. Whilst recognising the importance of providing significant levels of development within these areas, we also consider that the Council should consider available, suitable and deliverable sites outside these primary development zones and within sustainable locations, such as Land East of Lawrence Street, Mill Hill. We consider it is necessary to ensure flexibility in the type of sites brought forward to respond to the divergent needs of the Borough. Reliance on one particular type of land (brownfield) means that should there be any issues in terms of land availability or deliverability, the housing trajectory would suffer as a result. We consider the Draft Local Plan is unsound because it is contrary to national policy and the requirement to ensure a sufficient amount and variety of land to come forward where it is needed (Para 60 of the NPPF). The Council should ensure a variety of sites are identified within the Draft Local Plan, that are able to provide a variety of different types of housing.</p>
Mill Hill Missionaries	GSS01 Part B	<p>GSS01, Part B, of the Draft Local Plan, states the Council will direct 5,400 new homes towards "District Town Centres", with Part C stating 1,650 new homes will be directed towards "Existing and Major New Public Transport Infrastructure". As outlined within Annex 1 at Para 16.6.1, the boundaries of town centres were established in 2012 and have not been changed since this date. A significant level of development has come forward within Barnet since 2012, with the housing requirement also increasing therefore we consider the Council should seek to revise their town centre boundaries to reflect the changing circumstances in the Borough. Furthermore, Annex 1 defines "Town Centre" sites as those within 400m of a Town Centre boundary and "Existing and Major New Public Transport Infrastructure" as those within 400m an existing or new public transport hub which have not otherwise been identified as within Growth Areas, Town Centres of Major Thoroughfares. This distance identified for both town centre and major new public transport locations seems to restrict development and also is contrary to Policy H1 of the London Plan which wishes to encourage more housing towards locations within 800m of town centre</p>

Representor	Section	Summary of Comments
		boundaries. Also, the Council should consider revising the town centre boundaries to reflect the NPPF, which encourages strategic policies to respond to “long-term requirements and opportunities” (Para 22). We consider the Draft Local Plan is unsound because it is contrary to national policy and not justified. The Council should set the parameters more widely around town centres to reflect the London Plan and the NPPF. There are many sites within close proximity to town centres that are also highly sustainable, and the Council should acknowledge how these sites can contribute to meeting the identified shortfall of housing across London overall. We also consider the Council should revise their Town Centre boundaries, to ensure a sufficient supply of homes can come forward within the Plan Period.
Mill Hill Missionaries	GSS01 Part F	Policy GSS01, Part F, of the Draft Local Plan, states the Council will direct 2,800 new homes at “Other Large Sites” which includes Middlesex University in Hendon and Car Parks. However, as outlined within Annex 1, Part 4 of the Draft Local Plan, the Council only appear to actually identify sites to accommodate approximately 248 units (at Middlesex University, and car parks, and outside of Town Centre boundaries) across the Plan period, most of which are student housing. Furthermore, the Draft Local Plan does not include a specific policy on “Other Large Sites” nor does it provide criteria or define what constitutes an “Other Large Site”. As such, clarity on what sites represent “Other Large Sites” and how the housing land supply can be achieved within the Plan Period is sought from the Council. We consider the Draft Local Plan is unsound because it is contrary to national policy and not positively prepared. The information provided within the Draft Local Plan does not ensure a sufficient supply of deliverable homes within the Plan Period, specifically deliverable sites within years one to five of the plan period, in line with Para 68 of the NPPF. We recommend the Council defines “other large sites” within the Draft Local Plan and provides further clarity on where 2,800 new homes will be accommodated. Should the Council require further deliverable sites in order to meet this requirement, we consider that Land East of Lawrence Street is available, suitable and deliverable for development, specifically Parcel B of the site which is closely associated to the existing settlement.
Mill Hill Missionaries	GSS01 Small Sites	GSS01 identifies that 5,100 new homes will come forward on small sites that are not designated in the Local Plan, which over a 10-year period is 3,400 new homes. Table 4.2 of the London Plan 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 10-year target is a minimum of 4,340 homes. This is about 1,000 homes higher than the number that the Council anticipates providing on small sites. National policy, at para 68 of the NPPF, requires all Local Planning Authorities to identify land of one hectare or less to accommodate at least 10% of the overall housing requirement. 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 10-year life of the Local Plan. Table 5 suggests that the national policy requirement is achievable but that the London Plan small sites target may not be achieved. We consider the Draft Local Plan is unsound because it is contrary to national policy and not positively prepared. The information provided within the Draft Local Plan does not ensure a sufficient supply of deliverable homes within the Plan Period, specifically deliverable sites within years one to five of the plan period, in line with Para 68 of the NPPF. 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 Table 4.2 of the London Plan and the small sites target through finding any additional sites needed to address the small site shortfall.
Hammerson UK Prop and Aberdeen Standard Investments	GSS01, GSS02 GSS03	Para 16 of the NPPF is clear that Plans should be clearly written and unambiguous. H/ASI request improved clarity in Policies GSS01, GSS02 and GSS03, and their supporting text and plans, to ensure an effective plan and consistency with national policy
Roger Chapman Ramblers Herts & North Middlesex	GSS01	Without understanding where the strategic walking routes are it is difficult, if not impossible for developers and communities to visualise and work out how these ‘links’ can be made to work. A simple solution to this issue is to include active travel in GSS01, reference the Strategic Walking network and identify in the site specific proposals what links should be expected so that development schemes can reflect them. Proposed amendments GSS01 Delivering sustainable growth Add to end of first para: <i>“Prioritise active travel including pedestrian and cycle routes throughout all new development and improve pedestrian and cycle connections and routes drawing on the strategic walking network shown on the key diagram and proposals map.”</i>
Theresa Villiers MP	GSS01 Para 4.4.5	The 2021 London Plan target is for 35,460 – why is the Barnet Plan proposing 46,200 new homes? The MHCLG target of 5361 new homes is excessive. The borough should not attempt delivery on more than 2634 target in the March 2021 London Plan. Even this target is far too high but there is no possible justification for trying to exceed it. Additionally in para 4.5.1, Barnet is proposing to deliver 27,000 new jobs. I note from the comments made by the Federation of Residents Associations in Barnet that they are questioning whether this figure is net or gross. They point out that there will be job losses to make way for housing in areas such as Homebase in North Finchley, Brake Shear House in High Barnet and the North London Business Park among others. Clarification needs to be provided on this figure. The provision of housing in my constituency of Chipping Barnet is an important issue for my constituents, particularly when large developments are planned without the necessary infrastructure being put in place.

Representor	Section	Summary of Comments
Barnet Cycling Campaign	GSS02	We support the proposal to make walking and cycling the priority modes of transport in the Brent Cross town [4.12.3 This should be the default for all Growth Areas in the borough.
Hammerson UK Prop and Aberdeen Standard Investments	GSS02	As explained above, the structural changes to the retail sector have called into question the appropriateness of a retail-led redevelopment at Brent Cross North. This issue is not unique to Brent Cross and is being experienced in town centres across the UK. H/ASI continue to investigate options, but it is highly likely that an alternative approach will involve revitalising the existing Shopping Centre and introducing a broader mix of main town centre uses, along with residential accommodation, to complement the wider Brent Cross Growth Area and facilitate creation of a Metropolitan Town Centre. This is not fully recognised in draft Policy GSS02 and its supporting text which continues to focus, despite clear evidence to the contrary, on retail led growth. As a result we would suggest that the specific Brent Cross North para within Policy GSS02 be altered as follows- 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 <u>main town centre uses (including those contributing to the night-time economy) and a mix of residential homes to ensure that it acts as a regional destination and contributes to a vibrant and viable night-time economy.</u> The shopping centre Brent Cross North will be connected to a new high street to the south via enhanced connections new pedestrian and vehicular bridges over the North Circular. Development at Brent Cross North 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.
Hammerson UK Prop and Aberdeen Standard Investments	GSS02	Section 4.15 of the draft Local Plan recognises that the redevelopment of the Brent Cross Growth Area will be delivered over a long period of time – in excess of 20 years. The text acknowledges that over this time there will be a need to respond to changing economic, market and technological conditions. Whilst it is noted that the extant planning permissions benefit from some flexibility, it is anticipated that further planning applications may be required. As a result, the draft Local Plan explains that the Council intends to create a flexible planning policy framework that is capable of responding to future changes and enable the delivery of a successful scheme. However, whilst enabling flexibility, the Local Plan correctly emphasises the need for coordination in the delivery of strategic parts of identified Growth Areas. In particular the supporting text explains that 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. This is translated into draft Policy GSS02 which sets out a specific list of transport improvements. The draft policy then states that the Council 'will secure' contributions from developers towards the retrospective costs of infrastructure delivered in earlier phases of the development. The National Planning Practice Guidance explains that planning obligations are to be used to assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be: ▪ 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. These are set out as statutory tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended by the 2011 and 2019 Regulations) and as policy tests in the NPPF. H/ASI fully support the Council's intent that new or revised applications contribute to the funding or/and delivery of infrastructure needed to mitigate its impacts. However, each application needs to be assessed individually, having regard to any cumulative impacts, to determine the appropriate mitigation requirements in light of the tests of Regulation 122. As drafted this aspect of Policy GSS02 is unsound as it is not consistent with national policy. The wording should be updated to remove the positive presumption that new/revised applications will be required to contribute towards retrospective costs, and should instead refer to the relevant package of mitigation measures being determined on a case by case basis having regard to the tests of Regulation 122.
Hammerson UK Prop and Aberdeen Standard Investments	GSS02	Policy GSS02 refers to the Brent Cross Growth Area delivering a new waste management facility to replace the existing Hendon Waste Transfer station. The replacement facility is actually located in Brent Cross West Growth Area and therefore should be referenced in Policy GSS03, not GSS02.
Brent Cross South Limited Partnership ('BXS LP'),	GSS02	Given the importance of the Brent Cross Growth Area in terms of delivering new homes, jobs and infrastructure, it is important that Policy GSS02 – the policy applying specifically to the Brent Cross Growth Area – is fit for purpose and provides the necessary policy support to ensure that the development is deliverable and viable. The policy should allow for optimisation of the site, be worded so that it provides a reasonable level of certainty about what the Growth Area is expected to deliver, and recognise the close relationship of Brent Cross Growth Area to the neighbouring Growth Areas of Cricklewood, Brent Cross West and Staples Corner (in the London Borough of Brent). We consider that some of the unique opportunities presented by the Brent Cross Growth Area should be explicitly referenced in Policy GSS02, especially where this would provide consistency throughout the Plan. In particular, the policy should state that the Growth Area is, by virtue of being within a London Plan Opportunity Area, a location where site optimisation is supported. As recognised in Chapters

Representor	Section	Summary of Comments
		<p>5 and 6 of the Draft Local Plan, the Brent Cross Growth Area is a suitable location for Build to Rent (hereafter 'BtR') development, as well as being appropriate for tall buildings. The policy should explicitly express support for these types of developments.</p> <p>Policy GSS02 also implies, in the second para, that each development proposal in the Growth Area must meet all of the criteria listed, but some of the criteria (for example, restoring and enhancing the River Brent) will not be applicable to all proposals. Lastly, the Draft Local Plan refers throughout to residential and commercial 'quarters'. We feel as though this is misleading. Brent Cross Town is a mixed use development and terms that imply the segregation of certain types of uses which are perfectly able to exist alongside one another should be avoided. In the table below, we have provided some suggested re-wording that we consider would bring the necessary clarity and flexibility to Policy GSS02, whilst providing the policy support to ensure that Brent Cross Town can deliver on the ambitious targets set by the Draft Local Plan.</p>
<p>Brent Cross South Limited Partnership ('BXS LP'),</p>	<p>GSS02</p>	<p>As per our points in 1) above, it is suggested that the policy is amended as follows: <i>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 employment uses, 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. <u>Opportunities for optimising land and increasing site capacity across the Brent Cross Growth Area will be supported.</u></i></p> <p><i>Development proposals within the Growth Area must should, insofar as is relevant to the proposal:</i></p> <ul style="list-style-type: none"> • <i>Demonstrate how they assist in achieving and not undermining comprehensive development of the area;</i> • <i>Contribute towards the creation of a Metropolitan Town Centre;</i> • <i>Support the provision of a minimum of 9,500 new homes including a mix of tenures and types of housing, <u>including Build to Rent homes</u>;</i> • <i>Protect and where possible improve the amenities of existing and new residents;</i> • <i>Create a high quality, safe and attractive environment accessible to all;</i> • <i>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;</i> • <i>Provide sufficient community infrastructure, including new and expanded schools and primary healthcare capacity;</i> • <i>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.</i> <p><i>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.</i></p> <p><i>Meanwhile uses will be permitted where it can be demonstrated that they support the comprehensive development of the area.</i></p> <p><i><u>The Brent Cross Growth Area is an area considered suitable for the development of tall buildings, in accordance with Policy CDH04.</u></i></p> <p><i>A New commercial quarter <u>uses</u> focussed around the new Brent Cross West rail station will provide 395,000m2 of office development for over 20,000 new jobs. This Brent Cross Town 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.</i></p> <p><i>Transport Improvements</i></p> <p><i>Development proposals will need to bring forward the following- <u>The following transport improvements will be brought forward within the Brent Cross Growth Area through detailed design, planning conditions and/ or Section 106 agreements:</u></i></p> <ul style="list-style-type: none"> • Prioritise <i>Pedestrian and cycle routes throughout the new development and improvements to pedestrian and cycle connections and routes beyond the development area;</i> • Ensure <i>Good access for disabled persons throughout the area with step-free access at Brent Cross Underground and Brent Cross West stations;</i> • <i>A new rail station (Brent Cross West) on Thameslink line supported by a public transport interchange;</i> • <i>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;</i> • <i>Connections and/or improvements to the strategic road network, that are supported by Transport for London in relation to the TFL Road Network), and Highways England in relation to the M1 motorway, based on up to date mode share targets;</i> • <i>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;</i> • <i>Improved pedestrian access across the A41 Hendon Way to link with Brent Cross Underground Station; and,</i> • <i>A new rail freight facility to replace the existing Strategic Rail Freight Site.</i> <p><i>Progress of Brent Cross - The Local Plan will establish a series of indicators to monitor progress on Brent Cross <u>Growth Area</u>...</i></p>

Representor	Section	Summary of Comments
GLA – Planning	GSS02	Policy GSS02 and its supporting text set out a long-term strategy for the Brent Cross Growth Area, including how it can support the creation of a new Metropolitan Town Centre at Brent Cross Town. This supports London Plan Policy SD8 and the identification of Brent Cross as a future Metropolitan Town Centre.
TFL (Spatial Planning)	GSS02	We welcome the Council's commitment to delivering Healthy Streets in the Brent Cross growth area. We also welcome the addition of a reference to delivering step-free access improvements to Brent Cross Underground station as part of new development in the area.
Barnet Cycling Campaign	GSS03	We support the proposal for new and improved pedestrian and cycle routes to the new Brent Cross West. Safe cycling routes across the A5 and North Circular are vital to connect the borough.
Bestway Ltd	GSS03	Bestway generally supports the draft Local Plan's approach towards the Brent Cross West Growth Area (as set out in Policy GSS03). However, the policy includes prescriptive requirements for the redevelopment of the area, which are yet to be tested through detailed analysis (in this regard the policy suggests that further work will be set out in a more detailed planning framework for the area). Bestway's specific concerns relate to the draft policy's cap on the amount of new homes could be accommodated in the growth area (set at 1800 homes) and the requirement for development to provide a comprehensive scheme for the improvement of the junction between the A5/Edgware Road and the A406/North Circular. In addition, the policy lacks the clarity (set out in Para 4.16.8) that contributions towards infrastructure improvements (such as the A5/A406 junction) will need to be proportionate to the scale of development. Without supporting evidence which specifically justify these requirements, greater flexibility should be built into the policy concerning the level of development that is acceptable in the growth area. To be sound, Policy GSS03 needs to allow greater flexibility in terms of the level of development acceptable on the site, as well as how infrastructure will be delivered. In this regard the policy (first bullet point) should be amended to read: <ul style="list-style-type: none"> • "Approximately 1,800 new homes with the potential to increase further upon delivery of the West London Orbital (WLO) and/or subject to sound planning justification that an increased number of homes is acceptable". In addition, the fourth bullet point should be amended to read: "Development Proposals should contribute proportionally towards the delivery of a scheme for the improvement of the junction between the A5/Edgware Road and A406/North Circular supported by Transport London in relation to the TLRN".
TFL (Spatial Planning)	GSS03 GSS04	We welcome the addition of specific references in both policies to supporting development proposals that facilitate access to and delivery of the West London Orbital. 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. As requested previously we ask that in policy GSS03 the Council include potential contributions toward delivery of the West London Orbital scheme as well. Similarly, we repeat our request that in policy GSS04 the Council seek contributions towards new/improved active travel routes to Cricklewood station, as well as improved interchange, onward travel facilities and public realm outside Cricklewood station.
Alun Parker	GSS04	The proposed number of new homes (1,400) is excessive for the area shown on Map 3B Cricklewood Growth Area (containing sites 7 and 8) and cannot be achieved without creating tall or very tall buildings (as defined in policy CDH04) which would be out of keeping with the area. It should be mentioned that the B&Q site sits on a raised area of former railway sidings that is several feet above the ground level of the surrounding streets which is to be the benchmark for the start of height measurement. Furthermore, this proposed number of new homes does not respect either the historical and archaeological importance of Cricklewood, nor the conservation area of the Railway Terraces. Intensification of housing in this area would contradict Barnet's stated objective of drawing upon the legacy of Raymond Unwin (section 2.3.3) Valuable local amenities – health clinic, supermarket, historic pub (Lucky 7), building home improvement – could not coexist with this enormous number of new homes proposed Reduce the number of proposed homes – and do not allow tall or very tall buildings
Barnet Cycling Campaign	GSS05	We support the policy to reduce congestion and improve the pedestrian experience. We recommend the policy includes commitments for safe cycle routes and cycle storage within the area to support that aim.
Environment Agency	GSS05	Our regulation 18 comments highlighted some key environmental features and challenges that were specific to Edgware Growth area. This included: <ul style="list-style-type: none"> • The risk of fluvial flooding from Deans Brook, Edgwarebury Brook and Edgware Brook main rivers; • Functional floodplain (flood zone 3b) along the Deans Brook and Edgwarebury Brook river corridors; • There is also surface water flooding and a Critical Drainage Area (the Edgware Station CDA) within the growth area; • The area receives a level of flood protection from flood storage areas north of Edgware in Edgwarebury Park, Stoney Wood Lodge and near Bransgrove Road over the border in Harrow. These were constructed as part of the Silk Stream Flood Alleviation Scheme over 10 years ago. • There are river restoration and enhancement opportunities identified for the Edgware Brook, Deans Brook and Silk Stream main rivers. Edgware Town Centre is in effect surrounded by floodplains particularly on the eastern and southern boundaries by the Edgwarebury Brook, Deans Brook and Edgware Brook flowing into the Silk Stream. There are also two confluences with the Edgwarebury Brook and Deans Brook joining south of Brook Avenue and the Edgware Brook meeting the Deans Brook south of Deansbrook Road. Given these key features Policy GSS05 should include strategic

Representor	Section	Summary of Comments
		<p>principles aiming to achieve a reduction in flood risk from all sources, river restoration and enhancement and the improvement of or planning contributions towards strategic flood infrastructure where necessary. The preamble supporting text should explain the context for this. Though page 41 of the 'Schedule of Representations and Responses to the Regulation 18' report suggests you agreed with us and a change was made, the Policy appears to be unchanged. Without the inclusion of these principles and context we think the Policy is unsound as it's not positively prepared in that it is not meeting the area's objectively assessed needs and achieving sustainable development. It is also not consistent with the aims of paras 20 (b), 20 (d) or 149 of the NPPF. The issues we are raising with respect to this policy are strategic priorities for this area and if we don't make it clear they are priorities our concern is that they won't be considered priorities when bringing forward growth in this area.</p> <p>a) 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 and natural environment of the area. To deliver growth and regeneration at Edgware Town Centre, the Council will seek the following from development proposals:</p> <ul style="list-style-type: none"> • 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. • Improved flood risk resilience for the town and surrounding communities with provision of flood risk infrastructure and restored rivers. <p>(b) In addition, a supporting text para should be created to explain the context for this strategic priority. Our answers to Question 1 could help with the wording of this. Could potentially agree the specific wording via a Statement of Common Ground.</p> <p>We will continue to engage with the Borough and hope that our concerns can be addressed. We are available to attend the examination if necessary.</p>
Betterpride Ltd	GSS05	<p>We would like to submit the following representations to the draft Barnet Local Plan, on behalf of Betterpride Ltd, the freehold owner of Premier House, Edgware. The comments mainly relate to Site Allocation 27 in the draft Local Plan We welcome the changes to Policy GSS05, and support the principle that "The Council will support planning proposals that optimise residential density on suitable sites while delivering improvements to the amenity of the area". As the borough's only Major town centre, Edgware is an important, sustainable location with the infrastructure to support the provision of new housing. This is especially important in meeting the borough's London Plan housing targets, which are the fourth highest of all the London boroughs.</p>
Ballymore Group and TFL Commercial Development	GSS05	<p>Policy GSS05 notes the need to support growth in Edgware and enable its recovery from the COVID-19 pandemic. The policy goes on to refer to the need for "appropriate" floorspace for community, retail and office uses. In contrast to the approach in policy GSS05, our view is that the use of percentage figures in the site allocations is overly prescriptive. The approach may have the unintended consequence of constraining housing delivery particularly as the quantum is expressed as a proportion of floorspace, meaning that the requirement for non-residential uses would increase in-step with any increase in housing delivery. Such a constraint on housing delivery could run contrary to the aims of both the Local Plan and London Plan which seek to optimize housing delivery in town centres like Edgware.</p> <p>In responding to impacts of the pandemic on the borough's town centres, planning policies, particularly as they relate to town centre uses ought to be sufficiently flexible to ensure that sites can be delivered in the plan period and that objectives for regeneration and economic recovery are realised. In the context of shifting retail patterns, a more justifiable policy approach would seek an appropriate mix of uses to activate streets and deliver a resilient and relevant town centre offer. We therefore suggest the following amendments:</p> <p>Site 27 "75% Residential floorspace with 25% an appropriate mixed of town centre commercial uses (retail and office), entertainment, community, and car parking"</p> <p>Site 28 "70% Residential floorspace with 30% an appropriate mixed of town centre commercial uses (retail and office) and transport infrastructure"</p>
OmniState 360 Burnt Oak Broadway	GSS05	<p>It is considered that the policy, as currently drafted is unsound on the basis that it is not positively prepared or justified. Map 3C provides the draft boundary for the Growth Area, which we understand is based on that drafted for the associated SPD/town centre boundary. The area that immediately surrounds the town centre also offers significant capacity for redevelopment (particularly for housing), and as such consider that the boundary of the Growth Area should extend beyond the defined Town Centre Boundary to include edge-of-centre locations, including 360 Burnt Oak Broadway which represent additional opportunities to deliver much needed homes within a sustainable location (see also comments on the Schedule of Sites in relation to housing need).</p>

Representor	Section	Summary of Comments
		As drafted, the Plan currently fails to realise the potential of edge-of-centre locations for delivering much needed housing, particularly in the context of Barnet's disputed 5-year housing land supply. We consider that the Edgware Town Centre boundary should be extended through the Local Plan to include key edge of centre Locations, including 360 Burnt Oak Broadway. OmniState are currently bringing forward redevelopment proposals for the site at 360 Burnt Oak Broadway which sits adjacent to the currently defined boundary.
TFL (Commercial Development)	GSS05	TfL CD welcomes Edgware Town Centre being identified as an opportunity for regeneration and intensification and supports this policy, subject to the housing target being expressed as a minimum ie: <i>At least 5,000 new homes</i> ; Please see our more detailed comments below in respect of Site No. 27: Edgware town centre and Site No. 28: Edgware underground and bus stations.
TFL (Spatial Planning)	GSS05 Paras 4.16.3 4.16.4	TfL would welcome continued engagement with the Council in implementing the 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. As previously requested, 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. 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.
Professor Geoffrey Alderman	GSS06	This Plan contains a proposal to allegedly "improve 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." The proposed pedestrian and cycle route will inevitably encroach on wild-life habitat on and around the Silkstream River. This habitat currently supports squirrels, foxes, and an array of bird life including ducks, egrets, herons, woodpeckers, magpies and crows. The proposed pedestrian and cycle route is in any case completely unnecessary, as such a route already exists utilising Colindale Park and Sheaveshill Avenue at its junction with Colindeep Lane - Scrap the proposed pedestrian and cycle route.
Robin Kerr	GSS06 Site 9	Your guidance mentions assessing the "areas" needs. Given the huge amount of development that has taken place and is still ongoing in the Colindale area, I do not believe that the proposal to build 128 residential units on this strip of woodland meets the needs of the current local community in any way. By all means build on brownfield sites but, it is surely negligent of the council to consider destroying a comprehensively wooded area, with a mixture of long established planted and self-seeded trees, bushes and undergrowth. The removal of all these trees, will increase the likelihood of flooding, which this area is already prone to. There is also a considerable amount of wildlife that lives in this embankment, including bats, foxes, squirrels, mice, butterflies and many species of birds. It forms a natural green corridor to the Silk Stream which is listed as a site of importance in the borough. This proposed development would therefore have a negative impact on a local conservation area.
Robin Kerr	GSS06 Site 9	I do not object to a cycle path being constructed, linking Colindale and Rushgrove Parks. This would have a positive and beneficial effect for the community, allowing people to enjoy the natural beauty of the woodland.
Barnet Cycling Campaign	GSS06	We support the policy's commitment to Healthy Streets, as should be the default for all parts of the Borough. We hope the mentioned Pedestrian and Cycle Routes are built to LTN1/20 standards rather than inappropriate shared paths.
Environment Agency	GSS06	Our regulation 18 comments highlighted some key environmental features and challenges that were specific to Colindale Growth area. This included: • The fact that parts of Colindale are at risk of flooding from the Silk Stream main river and also surface water flood risk. Grahame Park and Sunnyside Park are Critical Drainage Areas coinciding with this growth area. • Colindale receives a level of protection from flood storage areas constructed as part of the Silk Stream Flood Alleviation Scheme approximately 10 years ago. • The Environment Agency is working on a new Silk Stream FAS intended to protect areas in Colindale and Rushgrove Park from flood risk. This is likely to require partnership funding contributions to be viable. • We have identified improvement measures for the Silk Stream main river across all parks mentioned in the Policy i.e. Colindale, Montrose, Rushgrove and Silk Stream Parks, to improve water quality and biodiversity. Although page 43 of the 'Schedule of Representations and Responses to the Regulation 18' report suggests you agreed with us and text revisions proposed, the Policy and supporting text appears to be unchanged. The revised text you have proposed is as follows: 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. 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

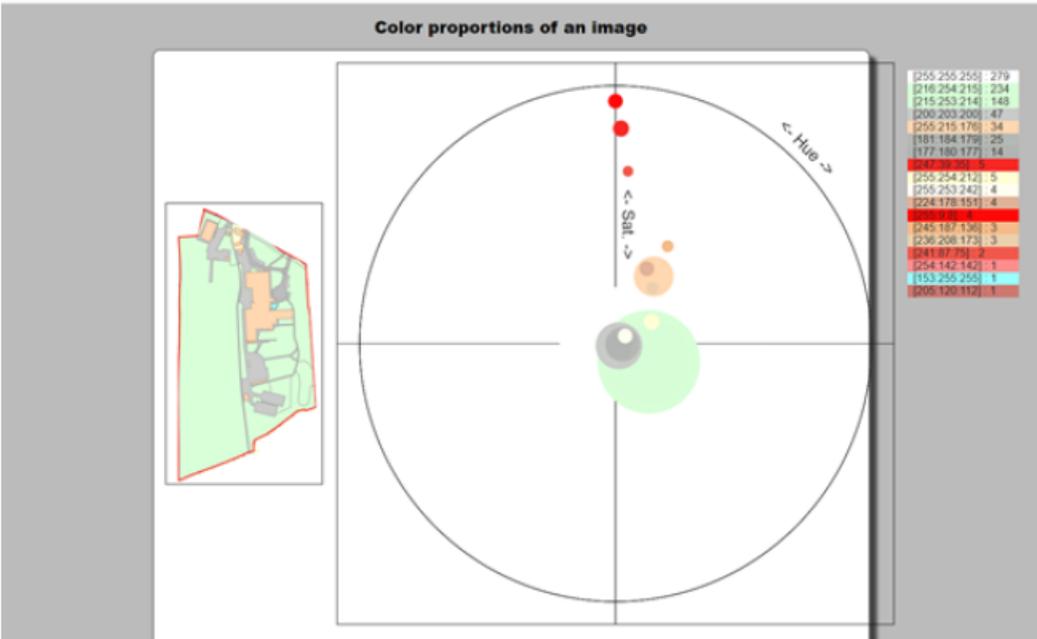
Representor	Section	Summary of Comments
		<p>complimenting the riverside location. We agree with this text but there are still significant omissions e.g. the reference to the risk of flooding in Colindale from fluvial and surface water, and the need to ensure that flood risk infrastructure is provided to reduce the level of risk either by working in partnership with us to deliver the Silk Stream FAS and/or on-site measures. As stated for GSS05, without the inclusion of the relevant principles and context we think Policy GSS06 is unsound as it's not positively prepared in that by not including appropriate reference to strategic flood infrastructure and river restoration, it is not meeting the area's objectively assessed needs and achieving sustainable development. It is also not consistent with the aims of paras 20 (b), 20 (d) or 149 of the NPPF. The issues we are raising with respect to this policy are strategic priorities for this area. Although still in its early stages the Silk Stream FAS is a strategic flood risk scheme which could be at risk if we don't receive the appropriate support we may need from third parties in the form of planning contributions, partnership working or related physical works. The policy needs to ensure it recognises flood risk infrastructure and river restoration as strategic priorities for this growth area so that future applicants are aware and will take the appropriate action.</p> <p>The revised text you have proposed is as follows: 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. 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 agree with this text but there are still significant omissions e.g. the reference to the risk of flooding in Colindale from fluvial and surface water, and the need to ensure that flood risk infrastructure is provided to reduce the level of risk either by working in partnership with us to deliver the Silk Stream FAS and/or on-site measures. As stated for GSS05, without the inclusion of the relevant principles and context we think Policy GSS06 is unsound as it's not positively prepared in that by not including appropriate reference to strategic flood infrastructure and river restoration, it is not meeting the area's objectively assessed needs and achieving sustainable development. It is also not consistent with the aims of paras 20 (b), 20 (d) or 149 of the NPPF. The issues we are raising with respect to this policy are strategic priorities for this area. Although still in its early stages the Silk Stream FAS is a strategic flood risk scheme which could be at risk if we don't receive the appropriate support we may need from third parties in the form of planning contributions, partnership working or related physical works. The policy needs to ensure it recognises flood risk infrastructure and river restoration as strategic priorities for this growth area so that future applicants are aware and will take the appropriate action. We recommend the policy is amended as follows: (a) POLICY GSS06 Colindale Growth Area In addition to new homes delivery the Council expects the following to be delivered: Improvements to open spaces and the Silk Stream main river which enhances the amenity, biodiversity and makes provision for play space, including at Colindale, Montrose, Rushgrove and Silkstream Parks; The provision of strategic flood risk infrastructure including contributions to fluvial flood risk schemes and measures to alleviate surface water flooding to ensure the area's resilience to the risks of flooding and climate change. Colindale development up to 2036 will be focussed at the following locations: 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. (b) Appropriate supporting text including the already agreed text specified on page 43 of the Schedule of Representations. Recommended wording to include: Parts of Colindale are at risk of flooding from the Silk Stream main river and also surface water flood risk. Grahame Park and Sunnyhill Park are Critical Drainage Areas coinciding with this growth area. Colindale receives a level of protection from flood storage areas constructed as part of the Silk Stream Flood Alleviation Scheme (FAS) approximately 10 years ago. However, the Environment Agency is working on the early stages of a new Silk Stream FAS intended to protect areas in Colindale from flood risk. This is likely to require partnership funding contributions to be viable. Developers are expected to consider new developments holistically and seek to deliver on-site and off-site measures to achieve a positive reduction in flood risk. 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>
TFL (Commercial Development)	GSS06	<p>TfL CD supports the general ambitions for growth within the Colindale Growth Area and also the specific reference to improving Colindale Underground station, including seeking developer contributions in order to help enable this. Please note that the improvements do not comprise a "new station", but a new ticket hall building (the platforms and much of the station infrastructure below ticket hall level will remain). Therefore, we suggest the following amendment to the policy for clarification: <i>New Colindale Underground Station ticket hall building station with step-free access to the platforms and sufficient gate capacity ... etc</i> TfL CD hopes to soon be seeking a new development partner to deliver the 313 new homes permitted following the grant of planning permission on 10 March 2020 or an alternative scheme. To reflect this, and confirm the delivery of much-needed new homes in a highly sustainable location adjacent to the station, we suggest a further amendment to the policy in respect of the second mention of the station: <i>Land at Colindale Underground Station will be redeveloped to provide a new, higher capacity, step-free access station ticket hall building that incorporates cycle parking and new homes;</i></p>
TFL (Spatial Planning)	GSS06 Para 4.19.4	<p>We welcome inclusion of additional wording which sets out that all development within 1km 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</p>

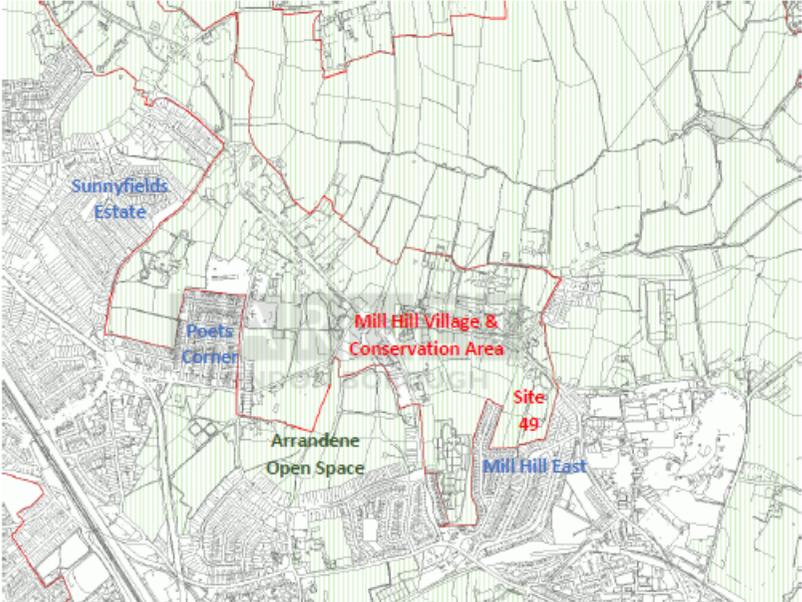
Representor	Section	Summary of Comments
		<p>additional cycle parking and that new development in Colindale should deliver improvements to streets and the public realm in line with the Healthy Streets Approach as well as measures to assist bus services including an expectation that new development will 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. We support the Council's ambition to improve connectivity and reduce severance where possible. We strongly encourage the Council to continue to engage with TfL 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 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. To better reflect proposals for Colindale station we suggest that the final bullet point on page 62 is redrafted to read as follows: 'Reconstruction and upgrading of Colindale Underground Station to increase its capacity and provide a step-free access station, along with additional cycle parking and facilitating the redevelopment of adjacent land owned by TfL and others.'</p>
Hurricane Trading Estate	GSS06	<p>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. The policy sets out that development in Colindale up to 2036 will be focussed at Land at Colindale Underground Station, The Grahame Park Estate, Colindale Gardens, The Public Health England site and Middlesex University's Platt Hall. The CAAP was adopted in 2010 and forms part of the wider Colindale / Burnt Oak Opportunity Area designated within the London Plan. The London Plan recognises the development potential of the Opportunity Area to provide 7,000 new homes and 2,000 jobs. 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. The current spatial strategy in the CAAP allocates four distinct Corridors of Change, for which most new development will be concentrated. These include Colindale Avenue (concentrated around Colindale tube station, for which there is an SPD); Edgware Road; Aerodrome Road and Grahame Park Way. The Site sits between the latter two Corridors of Change, which are significant regeneration projects. The CAAP is now significantly outdated, with many proposals identified within it now having been completed. Whilst a new framework for local growth under draft Policy GSS06 is welcomed, the draft policy misses the development opportunity presented by the Site. We strongly endorse an update to the CAAP to take account of changing circumstances and new opportunities presented beyond the existing document – including our clients' land interests. The current environment along Grahame Park Way, and Avion Crescent in particular, is overlooked within the CAAP, with the strategic focus on more intensive areas of change. This area is a key link road between two areas of change, but lacks character and feels like a transitional zone, comprising of an assortment of building types and uses. Indeed, the Site presents a significant opportunity to revitalise the route and unite the reinvigorated neighbourhoods at Grahame Park to the north and Beaufort Park to the south that current feel isolated from one another.</p>
Clarion Housing Group and the Huntingdon Foundation	GSS06	<p>Overall, we support the objective for development to be located in the Colindale Growth Area. However, the strategy outlined in Policy GSS06 is not considered to be sound in the context of NPPF (2021) Para 35 as it is not effective. It is over reliant on specific large and complex urban regeneration sites such as Colindale Gardens, Colindale Underground Station and the Public Health England Site; some of which are already being built out. Draft Policy GSS06 and it's associated supporting paras fail to recognise that there are other sites within the Growth Area, located outside of the major site identified on Map 3D at page 61 and listed at Para 4.19.8. that are suitable for redevelopment in the short term. The risk associated with the reliance on specific sites within the Growth Area to deliver development has not been effectively addressed within the Draft Local Plan or it's associated evidence base. There is no evidence presented to demonstrate the strategy is effective and could be successfully delivered over the plan period.</p> <p>The Council's supporting evidence base provides insufficient evidence to demonstrate that sites identified on Map 3D at page 61 and listed at Para 4.19.8 will deliver the desired quantum of development within the plan period. This issue has previously been acknowledged in Barnet's Housing Delivery Action Plan (2020) which states that a 'high dependence on larger sites results in a potential risk to overall future delivery, given the broad reliance on meeting a significant proportion of the target for new homes through a small number of very large schemes'. A reliance on large scale sites could delay delivery as there are often complex issues associated with landownership arrangements and viability.</p> <p>Para 4.19.3 states that "Colindale continues to deliver new homes with a development pipeline of over 6,000 units, 4,100 of which are within the Plan Period" and Draft Policy GSS06 states "the Growth Area has capacity to deliver 4,100 new homes between 2021 and 2036".</p> <p>Para 4.19.9 refers to proposals sites within the Colindale Area shown on Map 3D and listed in Annex 1. The indicative quantum of homes set out at Annex 1 in relation to the sites identified within the Growth Area on Map 3D totals 1,737 which fails to demonstrate how the target of 4,100 new homes will be delivered. It is unclear from the Draft Policy and supporting text how the remaining pipeline of 2,363 homes will be delivered and whether these homes are subject to extant planning permissions being delivered. The indicative capacity of the sites shown on Map 3D set out at Annex 1 is based on the rigid application of a density matrix. The indicative capacity of sites should be identified via a design led approach in accordance with new London Plan (2021) to enable the most appropriate density for the site, based on and in response to the key opportunities and constraints to be identified.</p> <p>To be sound Draft Policy GSS06 and it's supporting paras should be modified to support the mixed-use redevelopment of available sites and previously developed land within the Growth Area as a whole; such as Nos. 20-130 Colindeep Lane. At present the rigid focus large and complex urban regeneration</p>

Representor	Section	Summary of Comments
		<p>sites fails to provide sufficient flexibility to allow other sites to come forward. It is overly restrictive and rigid and fails to allow sufficient flexibility for successful implementation over the plan period of fifteen years. By way of an example, the Nos. 20-130 Colindeep Lane site is suitable for redevelopment and could deliver a number of new homes together with employment generating floorspace. The redevelopment of the site offers a significant opportunity to make more efficient use of the land and provide more modern, fit for purpose employment generating floorspace, as well as high-quality residential development. The site is unconstrained, available and deliverable within the plan period. This is an example of a suitable site which has development capacity to accommodate new housing and commercial development and reduce the over reliance on large, complex urban regeneration sites to meet the housing requirement in the shorter term. As drafted, there is a risk that the delivery targets will be unmet if one of the specific sites identifies fails to come forward.</p> <p>Map 2 at page 31 of the Draft Local Plan shows the Colindale Area as an Opportunity Area; however Map 2 should be explicit that area is both an Opportunity Area and a Growth Area. The Draft Local Plan should adopt a consistent approach through when defining/referring to Opportunity Areas and/or Growth Areas. Draft Policy GSS06 and it's associated supporting paras fail to address the capacity of the Growth Area in relation to creating new employment opportunities and provision of commercial floorspace. The defined boundary of the Growth Area show on Map 2 at page 13 is consistent with the boundary of the Colindale and Burnt Oak Opportunity Area. The London Plan (2021) is explicit that Opportunity Areas are significant locations that have development capacity to accommodate new housing and commercial development (Para 2.1.1). The Draft Policy GSS06 should acknowledge and support the role the Growth Area has in relation to delivering the 2,000 indicative jobs identified in Table 2.1 of the London Plan (2021) for the Colindale and Burnt Oak Opportunity Area. In order to be sound by being effective and in accordance with the NPPF (2021) and boost the supply of homes and optimise the use of land, Draft Policy GSS06 and the supporting paras need to be modified to provide better support and flexibility for the redevelopment of sites not set out at Para 4.19.8 (the key location) or shown on Map 3D and to support the provision of new employment opportunities and commercial floorspace.</p> <p>We request the following additional supporting para is included within the Draft Local Plan: <i>"In contributing towards the delivery and supply of homes and jobs, mixed-used redevelopment proposals on existing developed sites, will be encouraged across the Growth Area. Mixed-use redevelopment of sites outside of the key areas listed at Para 4.19.8 has the potential to optimise the use of land and deliver substantive benefits that would contribute to delivering new homes and jobs and support the viability and vitality of the Growth Area"</i>.</p> <p>We suggest Draft Policy GSS06 is modified as follows: <i>"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. The Council will also encourage the mixed use redevelopment on existing developed sites across the Growth Area that contribute towards the supply of homes and/or jobs. In addition to new homes delivery the Council expects the following to be delivered:</i></p> <p><i>... [bullets 1-10]</i></p> <ul style="list-style-type: none"> • New job opportunities and better quality commercial floorspace. <p><i>Colindale development up to 2036 will be focussed at the following locations:</i></p> <ul style="list-style-type: none"> • 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. • Other developed sites suitable for mixed-used redevelopment that have the potential to optimise the use of the land and to deliver new homes and job opportunities. <p><i>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"</i>.</p>
Joshua Barnett	GSS07	I believe this plan is not suitable because it impacts 3 main areas: Nature conservation: this area is green belt and should remain undeveloped. It is a home to wild life & acts as a local carbon offset; Effect on conservation area: as mentioned this land is green belt & housing needs should be better directed

Representor	Section	Summary of Comments
		towards the regeneration of brownfield sites, rather than the destruction of green belt; Overlooking/ loss of privacy: this land is on a hill and any development would overlook my/the surrounding properties. The plan to develop this land should be rejected
Oakfield House, Burtonhole Lane, Mill Hill	GSS07	The policy requirement "Development proposals must demonstrate careful consideration of any impacts on the Mill Hill Conservation Area ..." is welcomed, but there is a significant concern that this policy lacks the strategic assessment necessary to justify this growth area and that the positive approach to development will not hinder the Conservation Area cumulatively. There should be a strategic assessment of the impact of this growth area both in terms of visual and functional impact resulting from the cumulative development, or require the developments to be strategically masterplanned to avoid a cumulative impact.
Victor Montefiore	GSS07	A. The percentages in the statement "80% retained as undeveloped Green Belt with 18% residential and 2% community floorspace" in the annex for site 49 need recalculation based on Barnet's commitment to the GLA that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt" etc. B. The 'Indicative residential capacity' in the annex for site 49 of 224 needs to be recalculated based on Barnet's commitment to the GLA that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt" etc. C. The figure of 547 in para 3 of Policy GSS07 "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" needs recalculation based on Barnet's commitment to the GLA that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt" etc.
John Lewis Partnerships	GSS07	JLP owns land within the Mill Hill East area shown on Map 3E Mill Hill East. JLP's site comprises the Waitrose store and car park, immediately to the south of the railway line, next to Mill Hill East Station. JLP's site has the potential to contribute towards meeting the housing needs of the plan; whilst retaining and improving the existing Waitrose store. JLP is keen to work with the Council to develop an appropriate scheme on the site. Firstly, to make Policy GSS07 and emerging Local Plan more 'effective' and 'justified' JLP's site should be included within its development sites. Since the previous consultation on the local plan, the John Lewis Partnership has identified the site as a potential location for a mixed-use residential scheme which retains the existing Waitrose shop and therefore could contribute to housing delivery within the next five years. Its inclusion in the Mill Hill East policy and as a site allocation, will help give more assurance to the ability of the plan to deliver the new homes required over the plan period. Secondly, Policy GSS07 should be updated to make it consistent with national policy which encourages making effective use of land. The current policy wording refers to Mill Hill East delivering 'good suburban growth'. This should be updated to reflect that more intense development could be achieved on sites which are well served by public transport (i.e. next to stations like JLP's site). This would make it consistent with NPPF Policy (Para 125 a) which states plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. To bolster the soundness of this policy the emerging Local Plan should be updated to reflect this suitable, deliverable and available site. Amendments required to Policy GSS07 to make it sound are as set out below. Struck out words are to be omitted. Additions are shown in bold . <i>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. More intensive development may be appropriate at Mill Hill East Station and on land to the South of Mill Hill East Station</i> , The addition of the Waitrose site and car park, 'Land South of Mill Hill East Station' should also be reflected within the Schedule of Site Proposals in Annex 1.
TFL (Commercial Development)	GSS07	TfL CD appreciates the Council's support to deliver good growth at Mill Hill East Station. However, as we have previously said, given the good level of public transport accessibility (PTAL 3 and adjacent to the underground station) we would suggest that 'urban' rather than 'suburban' growth would better optimise the opportunity to deliver new homes close to the station. Indeed, the reference to "good suburban growth" is confusing in the context of the cited Millbrook scheme which comprises multi-storey apartment buildings presenting more of an urban than suburban face to Mill Hill East. We would suggest that this policy is reconsidered in order to clarify that development at and close to the station would be expected to be of a scale that, subject to a design-led approach, would optimise development potential and density in this accessible and sustainable location. As suggested above, all housing targets should be expressed as minima in order to provide flexibility as and when housing targets change as a result of updated targets at a national and / or London Plan level during the lifetime of the Local Plan.
TFL (Spatial Planning)	GSS07	We welcome the requirement for proposals to be supported by a transport assessment, but it should be made clear that this will need to take into account cumulative impacts from all planned and proposed development because the station has particularly limited capacity at its gates and staircases. This has been reflected to a degree in Policy GSS09 Existing and Major New Transport Infrastructure, but the 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.

Representor	Section	Summary of Comments
Elizabeth Silver and 18 Co-Signatories	GSS07	<p>A. Watchtower House and Kingdom Hall - A1. Non-compliance with Duty to Cooperate The Mayor has stated (Appendix B Reg 18 Schedule of Representations & Responses p 154) regarding Site 49: "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt". Inclusion of the Watchtower site and Kingdom Hall site in the Growth area, goes against the Mayor's instructions.</p> <p>A2. Not justified Barnet Council stated (ibid. pages 175,179,184) : "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. ". Development on site 49 as suggested in Reg 19, increasing the total built footprint three-fold (see below) , will effectively remove this site's designation as Green Belt.</p> <p>A3. Contravention of London Plan Policy G2 and NPPF 2021 paras 137, 140, 141, 147-149: A significant increase in footprint or volume on Green Belt, if permitted, can effectively de-designate the Green Belt and destroy its permanence. Reg 19 permits the increase of the built footprint on Site 49 from the current 7% to 20%, i.e. a three-fold increase. Replacement of hard-standing (e.g. tennis courts used as parking) by buildings three or more stories high, is therefore not legally compliant in a Green Belt setting.</p> <p>A4. Contravention of Policy G1: The Watchtower House site forms one end of a continuous green corridor going westwards from the gardens of Bittacy Park Avenue to Drivers Hill, a Site of Borough Importance Grade II, and is part of an important habitat. Increasing the footprint or building volume or removing mature trees, will be detrimental to biodiversity.</p> <p>B Mill Hill East station</p> <p>B1. Non-compliance with Duty to Cooperate with Mayor and TfL The Mayor's comments (Appendix B Reg 18 Schedule of Representations and Responses, p. 10) "the Mayor ... 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....development proposals should contribute towards capacity enhancement at stations" have been disregarded. TfL says the same on p. 195. TfL states (ibid. p. 46) "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."</p> <p>B2. Contravention of London Plan Policies T3 and T5: Inclusion of Mill Hill East Station in the growth area will impede expansion of train capacity which is central to the Barnet Plan for dominant use of public transport (Reg 19 11.5.1 and Policy TRC01) Thousands of homes are being built, e.g. on the Ridgeway, that are not within walking distance of the station, that have reduced car parking spaces, with the expectation that people will be cycling. The station car park has only 42 car spaces, which could be converted to only 160 cycle spaces, so building on the station car park is unsound and not legally compliant.</p> <p>B3. Unsoundness – due to ambiguity, contrary to NPPF 2021 para 16d Barnet Council (Appendix B Reg 18 Schedule of Representations & Responses p 154) commenting on GSS07, promises that: "Growth within the Mill Hill East area will support improvements to public transport. Policy GSS07 has been revised to outline more specific improvements. "</p> <p>However, GSS07 in Reg 19 para 4, is very unspecific and open to interpretation (see quote from TfL in my para B1 above), compared to the specific targets for homes in GSS07 para 1. Improvements to public transport cannot take place if housing on the Mill Hill East station site prevents expansion.</p> <p>To make GSS07 legally compliant and sound</p> <p>Para 3: Remove references to Watchtower House and Kingdom Hall and Mill Hill East station as part of a Growth Area.</p> <p>Para 4: Add: "Provision must be made for increased train capacity at Mill Hill East station and retention or increase in parking for cycles and cars, in accordance with the new housing numbers in Mill Hill East."</p>
Victor Montefiore	GSS07 Para 3	<p>A. The local plan annex states 80% of the 7.31 hectares, i.e. 5.85 hectares, of the site should be retained as undeveloped green belt.</p> <p>B. The sales particulars for the site say that the western parcel is 38,565m2 (i.e. 3.86 hectares) and the eastern parcel is 32,629m2 (i.e. 32.6 hectares) totalling 71,194m2 (7.12 hectares) [1,2]</p> <p>C. The sales particulars for the site say that the undeveloped green belt on the western parcel is 38,064 m2 (i.e. 3.81 hectares) and the eastern parcel is 28,058m2 (i.e. 2.81 hectares) totalling 66,122m2 (6.61 hectares), that is to say 92.88% of the current site is undeveloped green belt. [1,2]</p> <p>D. Systematised graphical analysis of the built areas of Barnet's site map gives a similar percentage - that is to say 91.4% of the site is undeveloped green belt [3]</p> <p>E. On the 16th March 2020 Debbie Jackson, GLA's Director for the Built Environment, wrote to Nick Lynch stating in relation to site 49 that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt"[4 (see page 11)] and "Draft Local Plan Policy GSS07 – Mill Hill East should make it explicit that Green Belt must not be developed, except on previously developed land." [4 (see page 3)]</p> <p>F. Barnet responded "Agreed – GSS07 revised" and with regard to site 49 Barnet responded "Agreed. Proposal reflects this".[5]</p>

Representor	Section	Summary of Comments
		<p>G. However Barnet's responses were duplicitous (not duplicative) and non-cooperative because whilst para 5 of GSS07 was revised, para 3 of GSS07 was not revised to account for the reduction in the number of new residential units that could be delivered i.e. the figure of 547 needs to be revised downwards as it is based on the erroneous estimate of 224 units on site 49, which in turn is based on the erroneous calculation of 80% of the site being undeveloped green belt.</p> <p>H. Note that planning application W03005AJ (September 1997) "Excavation to provide a hard surfaced tennis court and surrounding fencing" (and similar) does not constitute a building on the green belt such that a building could be erected on this part of the footprint.</p> <p>[1] Source: https://ibsaproperty.com/properties/watchtower-house/ and https://web.archive.org/web/20210725180220/https://ibsaproperty.com/properties/watchtower-house/</p> <p>[2] Source: https://web.archive.org/web/20210725180417/https://ibsaproperty.com/properties/conf-centre-and-open-field/ and https://ibsaproperty.com/properties/conf-centre-and-open-field/</p> <p>[3] Source: Representation sent in relation to Reg 18 sent by Victor Montefiore on 15th March 2020 and illustrated overleaf</p> <p>[4] Source: https://www.london.gov.uk/sites/default/files/PAWS/media_id_491869/Mayor%20Response%20Barnet%20Reg%2018%20final.pdf</p> <p>[5] Source: https://barnet.moderngov.co.uk/documents/s65265/Appendix%20B%20-%20Barnets%20Local%20Plan%20Schedule%20of%20Representations%20and%20Responses%20to%20Preferred%20Approach%20.pdf</p>  <p>The image shows a circular plot with a central green area and several orange and grey areas. A legend on the right lists color codes and their counts. Below the plot, calculations are provided for the Undeveloped Green Belt count and the Existing footprint of the building.</p> <p>Undeveloped Green Belt count (green plus grey) = 234 + 148 + 47 + 25 + 14 = 468</p> <p>Existing footprint of the building (orange) = 34 + 4 + 3 + 3 = 44</p> <p>⇒ Undeveloped Green Belt = 468 / (468 + 44) = 91.4%</p>
Victor Montefiore	GSS07 Para 3 and 5 and Map 3E	<p>A. The map overleaf shows (i) Mill Hill Conservation Area (bounded by the red line) and (ii) Green Belt (green vertical shading)</p> <p>B. The map also shows (i) to the West of Mill Hill Conservation Area the urban sprawl and massing of the Sunnyfields Estate (ii) to the South of Mill Hill Conservation Area the urban sprawl and massing of the Poets Corner development and development south of Arrandene Open Space (iii) to the East of Mill Hill Conservation Area the urban sprawl and massing of Mill Hill East</p>

Representor	Section	Summary of Comments
		<p>C. NPPF 138 states "Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."</p> <p>D. The inclusion of site 49 in Policy GSS07 Mill Hill East and Mill Hill East's designation as a 'Growth Area' removes the restriction on the sprawl of the large built up area of Mill Hill East into Mill Hill Conservation Area and towards Mill Hill Village, and is therefore in direct conflict with NPPF 138 part a.</p> <p>E. The inclusion of site 49 in Policy GSS07 Mill Hill East and Mill Hill East's designation as a 'Growth Area' stops its safeguarding of Mill Hill's precious countryside from encroachment, and is therefore in direct conflict with NPPF 138 part c. Indeed the western parcel of site 49 is countryside - it is farmland and Kingdom Hall itself is on the site of the farm buildings "Farm buildings were located on this site until the early 1990's and these buildings along with the open land stretching down the hill to the south served as a working farm, with dairy cows and chickens being resident." (see https://lbsaproperty.com/properties/conf-centre-and-open-field/details/) and should be designated Metropolitan Open Land.</p> <p>F. The inclusion of site 49 in Policy GSS07 Mill Hill East and Mill Hill East's designation as a 'Growth Area' damages the setting of the historic town of Mill Hill Village (an 'Area of Archaeological Significance'), and is therefore in direct conflict with NPPF 138 part d.</p> <p>G. The inclusion of site 49 in Policy GSS07 Mill Hill East and Mill Hill East's designation as a 'Growth Area' removes the incentive for urban regeneration of Barnet's redundant office space and is therefore in direct conflict with NPPF 138 part e. Note that Barnet's 'call for sites' was prior to the pandemic (i.e. 'by 3 August 2018' per https://www.barnet.gov.uk/planning-and-building/planning-policies/local-plan-review/call-sites) and now much evidence is showing offices are not being occupied with pre-pandemic regularity and as such are ripe for residential development because of the work-from-home revolution (https://www.cbre.co.uk/research-and-reports/UK-Will-Working-from-Home-Change-the-Central-London-Office-Market-March-2021 https://www.jll.co.uk/en/trends-and-insights/cities/how-post-pandemic-living-will-redefine-uk-real-estate https://www.architectsjournal.co.uk/news/city-of-london-looks-to-turn-empty-offices-into-homes).</p> <p>H. Note that points D-F above are true regardless of the of the fact that the site was formerly identified in the UDP as a Major Developed Site against the old PPG.</p> <p>Part of response to Question 3: map showing (i) Mill Hill Conservation Area (bounded by the red line) and (ii) Green Belt (green vertical shading)</p> 

Representor	Section	Summary of Comments
Victor Montefiore	GSS07 Para 3 and 5 and Map 3E	A. GSS07 para 3 should state "The Council will positively consider proposals on suitable sites to deliver further good suburban growth, including at Mill Hill East Station and IBSA House, which together could deliver around 324 new homes" where 324 is the sum of the indicative residential capacity for remaining sites 46 (197) and 47 (127) B. Removal of para 5 given that site 49 (Watch Tower House [including Kingdom Hall]) is designated green belt to protect Mill Hill Village from the urban sprawl of Mill Hill East. C. Removal of site 49 from Map 3E Mill Hill East Growth Area
Finchley Society	GSS07 Para. 4.20	The discussion glosses over the constraints on the capacity of Mill Hill East Station, with the impossibility of making the line to Finchley Central doubletrack. Add a sentence to 4.20.3 acknowledging the constraints on the improvement of public transport to cope with big population increases. I wish to associate the Finchley Society with FORAB's wider comments on this section of the Plan; they will be participating at the hearing.
Barnet Cycling Campaign	GSS08	We welcome the inclusion [g, h] of Sustainable Travel and Active Travel in the policy for Barnet's town centres. We suggest that noise-reduction targets [c] consider the noise from through traffic, which has a major negative impact on town centre appeal. We propose that the Borough uses its powers to allow conversion an unused retail unit in each town centre for secure cycle storage [similar to www.bike-drop.com/] which would be especially attractive to owners of E-bikes and large adaptive cycles and cargo bikes.
Brad Blitz	GSS08 GSS12	This part of the Local Plan Reg. 19 is not sound: It is not positively prepared – in that it does not meet the area's objectively assessed needs and is therefore not consistent with achieving sustainable development; It is not justified based on proportionate evidence; It is not effective, as evidenced above; and It is not consistent with national policy enabling the delivery of sustainable development in accordance with the policies in the NPPF. It is also not legally compliant, nor compliant with the Duty to Cooperate. In several places the draft Local Plan Reg. 19. mentions ultra vires sources, e.g. the 'Emerging Burroughs and Middlesex University SPD' (See pp. 340-350). This SPD was unlawfully approved by the LB Barnet Policy and Resources Planning Committee on 20 July 2021. Other supporting documents contain factual inaccuracies (e.g. Integrated Impact Assessment for Barnet's Draft Local Plan (Reg 19) May 2021) or multiple omissions e.g. (Key Facts Evidence Paper). Further, there were problems with the consultation process over the Draft Local Plan (Reg. 18), as noted in communication to the Aarhus Convention Compliance Committee (ACCC/C/2021/185).
Brad Blitz	GSS08	The Draft Local Plan Reg 19 Cites Policy GSS08 Barnet's District Town Centres as one basis for the proposed developments in Hendon – one of the proposed district town centres. The Draft Local Plan Reg 19 para 7.2.3 states: "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" p.149. The Good Growth policies of the London Plan emphasise the need to protect character and heritage. "London's distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special feature that Londoners value about a place, such as cultural, historic or natural elements, can be used positively to guide and stimulate growth, and create distinctive, attractive, ad cherished places" (see 1.2.7). The proposals by virtue of their size, scale and density pose major threat to the character and heritage of the area. This fact has been recognised by Historic England to two letter submitted to the Council on 22 February 2021 and 19 July 2021 where the heritage body identifies significant harm resulting from the proposed developments in the two conservation areas, including the proposed alterations to the Hendon Library, and the erection of unsympathetic buildings on the Burroughs and more importantly, the overdevelopment of buildings on Church End, overlooking the ancient church.
Regal JP North Finchley Ltd	GSS08	Chapter 4 sets out the Growth and Spatial Strategy for the Borough. Draft Policy GSS01 identifies 6 Growth Areas that are considered distinctive locations with good public transport accessibility and a supply of brownfield and underused land that offer opportunities for inward investment. In total the Growth Areas are planned to deliver 23,300 homes, ranging from 9,500 homes at Brent Cross Growth Area to 1,400 homes in Cricklewood and 1,500 homes in Mill Hill East. Each of these Growth Areas has its own policy which sets out the specific matters that need to be considered in planning for growth in each location. Draft Local Plan Policy GSS08 supports investment and revitalisation across the Borough's District Centres, including North Finchley. Whilst these priorities are supported, given the scale of change and growth planned by the Council at North Finchley (as evidenced in the adopted SPD) we do not consider that a general town centre policy gives enough clarity to enable the step-change in growth required. The SPD notes that North Finchley is one of the Borough's largest centres and sets out the scale of ambition proposed across the town in order to facilitate successful and long last revitalisation. Indeed, the scale of change proposed at North Finchley is larger than some of the smaller Growth Areas identified in the Local Plan, and represents over a third of the total housing growth envisaged across all District Centres. To ensure the Local Plan is soundly based, with a positively prepared strategy, that is effective and deliverable, Regal JP suggest that a specific policy be prepared for North Finchley. As required by the NPPF the policy should provide a clearly written and unambiguous explanation of the scale of change proposed across the Town Centre, highlighting the specific matters that need to be considered in assessing any applications proposals, and importantly the infrastructure required to support coordinated revitalisation. Building on the SPD, Regal JP is currently

Representor	Section	Summary of Comments
		investigating in more detail the opportunities that exist across the Town Centre. Regal JP would welcome the opportunity to share this emerging evidence with the Council and discuss in more detail a bespoke North Finchley policy to ensure a sound plan is advanced to Examination.
FORAB	GSS08	In other documents Barnet's town centres are very narrowly defined as encompassing the retail areas only. So on the face of it the target new homes figure seems excessive. We have however now been led to understand the definition of town centres for the purposes of the Plan extends to 800m beyond the retail boundary. This does make more sense but there may be overlap with target figures in other categories, e.g Woodside Park station (see GSS09). The definition of the area encompassing the town centre target should be made clear and figure checked to ensure there is no duplication with targets under other headings.
TFL (Commercial Development)	GSS08	TfL CD supports the development of new mixed-use housing schemes in sustainable locations within the Town Centres and recognition of their vital role in delivering sustainable growth and post-Covid recovery. In particular, the focus on the main town centres such as Finchley Central and Golders Green is sound as they are adjacent to railway stations providing access to central London and elsewhere. In addition, we strongly support the requirement to optimise residential density (b) in order to make the most efficient use of brownfield land and take advantage of high levels of public transport accessibility. As above (under GSS01) we note the reduction in capacity for District Town Centres from 6,100 in the Reg 18 version of the Draft Local Plan to 5,400 in the Reg 19 version. The Council will need to ensure that the reduced figure still optimises opportunities for the delivery of housing in these highly sustainable locations. We also reiterate that all housing targets should be expressed as minima in order to provide flexibility as and when housing targets change as a result of updated targets at a national and / or London Plan level during the lifetime of the Local Plan. In our Reg 18 representations we pointed out that it is not clear what is meant by the requirement that <i>proposals "do not have a negative impact on areas outside of the town centre"</i> (d). This has not been updated and as presently worded it is imprecise, unclear and, in our view, unsound. Therefore, we suggest, again, that clarification is provided as to what types of impacts are meant to be avoided. We also strongly support the requirement to support sustainable travel and provide parking at the minimum required standard, including at zero provision where appropriate. This accords with the MTS and London Plan policy T6 (Car Parking). However, it is not clear what is meant by the reference to car parking <i>"established standards"</i> in (g). We suggest that this is replaced by a specific reference to the London Plan as setting standards for car parking. We appreciate the additional support for active travel modes and the Healthy Streets Approach which has been added since Reg 18. We would also, again, urge the Council to consider extending the town centre boundary for Chipping Barnet (Map 2 – Key Diagram) to include High Barnet Station as there are clear transport and interchange links between them (please see below).
Barnet Society Committee	GSS08	The planned figure of 5,400 new homes seems low if a town centre area is deemed to extend 800m from its centre, as we understand from informal communication between planners and the Federation of Residents' Associations of the London Borough of Barnet (FORAB). Clarification is needed of the basis for the figure of 5,400 new homes in town centres.
TFL (Spatial Planning)	GSS08	We support optimising density in town centres. We strongly welcome the supporting text of para 4.21.7 and the additional reference to the Healthy Streets Approach in the policy text. We welcome the intention of part g of the policy to minimise parking provision including zero provision where appropriate and the amended wording which addresses our previous comments. We would also welcome working with the Council on any Supplementary Planning Documents relating to town centre planning objectives to unlock growth.
New Barnet Community Association	GSS08	New Barnet is constantly referred to as a District Town Centre. While it does have a supermarket greater than 500m ² and a gym in a converted office building it has few other shops and does not provide destination shopping other than for the supermarket. As a resident of New Barnet I am forced to travel to either Chipping Barnet or North Finchley to shop for anything other than food. We have no bank, clothes shopping, electrical or hardware. New Barnet consists predominantly of fast food shops and cafes, hairdressers, a sub post office and newsagent, two public houses betting shop and dry cleaners. The intention of the policy appears to relate only to the main town centres and these are specifically listed. However, Policy GSS08 uses the all encompassing title of "Barnet District Town Centres" but then refers to "Main Town Centres". The ambiguity between "District" and "Main" town centres may therefore lead to a lack of clarity when making planning decisions, allowing developers to interpret where major housing development can take place. I would ask that this policy heading is revised to state "Barnet's Main Town Centres" and that all other references in the document are changed from 'District' to 'Main' town centres. This will provide much greater clarity on this policy and eliminate the ambiguity between Main and District Town Centres.
Barnet Cycling Campaign	GSS09	We support development and regeneration close to major transport infrastructure if safe cycling and walking routes are provided in the locality. Provision for safe walking and cycling routes, and secure cycle storage, should be supported at all new and existing transport hubs named in the policy. [For example, there are a number of stations in the borough without a safe pedestrian crossing directly outside].
Regal JP North Finchley Ltd	GSS09	Draft Policy GSS09 highlights the potential for growth at existing public transport hubs with high PTAL ratings. Whilst this strategy is to be encouraged, it is not clear how this policy, and its associated criteria, relate to other growth policies eg Policy GSS08, which typically include public transport hubs but with different assessment criteria identified. Clarity should be added to the policy or supporting text to confirm the relationship of Policy GSS09 with other policies within the draft Local Plan.

Representor	Section	Summary of Comments
FORAB	GSS09	There is a presumption that existing transport hubs have potential for growth without any evidence to assess whether the public transport provision will have the capacity to meet additional demand. The potential to provide extra train capacity on the two branches of the Northern Line is very limited yet several thousand new homes are earmarked for locations along both branches (including Finchley Central station, Mill Hill). Edgware and Colindale) will be significant here yet are not mentioned in this policy. An assessment should be included in the Plan of the potential extra traffic on the two branches of the Northern Line and Thameslink and the capacity of the trains to cope with this extra traffic. See also related comments on policy TRC02
DTZ Investors UK Ltd	GSS09	GSS09 seeks to deliver growth and regeneration at existing transport hubs and alongside major new transport infrastructure at New Southgate and West London Orbital. This includes development for new homes, employment and community, retail and commercial uses. The policy states that New Southgate and Crossrail 2 have the potential for at least 250 new homes and that the Council will consider new planning frameworks to support comprehensive redevelopment in alignment with progress on Crossrail 2. Whilst this policy supports the opportunity for development at New Southgate, it does not consider the options available if Crossrail 2 is not delivered. The supporting text at para 4.23.6 which states "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", highlights the development opportunities around the North Circular Road, which include the Site, and DTZ supports this. In light of the above, the policy wording is currently unsound as it fails to take into account reasonable alternatives (ie Crossrail 2 not coming forward), and it is therefore not justified. We therefore recommend the following amendment to the policy wording: <i>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. 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.</i>
Hendon Goods Yard Village Ltd	GSS09	Para 5 and Supporting Text 4.24.5 - As per our client's response to Draft Policy GSS02, our client considers that Draft Policy GSS09 is sound and supports the Draft Policy objective for 'significant intensification and growth at Hendon station' including the delivery of residential as the priority use (supporting text 4.24.5). This actively supports the NPPF Para 119 and London Plan Policy GG2 ('Making effective use of land') and is therefore being considered sound on this basis.
TFL (Commercial Development)	GSS09	TfL CD strongly supports the recognition that: " <i>Public transport nodes, particularly of underground and over-ground rail infrastructure, provide locations of higher PTALs that can support significant intensification and growth.</i> " [para 4.24.1] Much of TfL's programme for development in the borough is on this basis and it is an approach this is supported by both the London Plan and NPPF. We also strongly welcome the recognition, in accordance with the Draft Growth Strategy, that station car parks offer opportunities for redevelopment through utilising the high PTALs and other potential site characteristics such as town centre locations, and that the Council's expectation is that such sites will be developed primarily for residential uses [para 4.24.5]. Para 4.24.7 and the policy itself lists a number of stations that are " <i>not linked to a town centre which are expected to support development</i> " such as Mill Hill East, New Southgate etc. Since the Reg 18 version of the draft Local Plan, Woodside Park has been removed from this list. It should be reinstated because it provides two housing development opportunities on TfL land [Annex 1, Site Nos 55 and 56] with capacity to deliver 451 new homes, one of which already has planning permission. In this context, we also note that High Barnet station is not within a town centre boundary, although it is adjacent to Chipping Barnet town centre and our proposals will seek to strengthen links between the station and Chipping Barnet District town centre (as well as nearby Underhill). As above, and as we said at Reg 18, we would urge the Council to consider extending the town centre boundary to include High Barnet Station as there are clear transport and interchange links between them. Notwithstanding, we reiterate that policy GSS09 should prioritise all public transport nodes for the optimal development of new homes. If High Barnet is not included within Chipping Barnet town centre then it should be recognised as a prime, well-connected brownfield site, and specifically identified in draft policy GSS09 as a growth area for new development. We appreciate that you have changed your approach to the re-provision of commuter car parking on these sites since Reg 18. You now say that the level of station car parking provision should be assessed in light of encouraging the use of public transport and active modes of travel. This should enable our schemes to reduce commuter car parking, enabling us to optimise development opportunities and housing delivery and, importantly, to contribute towards meeting other important objectives of the MTS and London Plan including: the target for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041; 'vision zero' to eliminate all deaths and serious injuries on London's transport system; and the Healthy Streets Approach. However, we do not support the final sentence of the policy and, in particular, the reference to " <i>multi-storey design</i> ". We are likely to focus car parking re-provision on a much smaller number of spaces for people with disabilities including 'blue badge' holders. The provision of multi-storey car parks is unlikely to be acceptable from a design point of view (often resulting in full or partial blank facades) and would often jeopardise scheme viability (especially for our schemes with very high affordable housing provision), particularly when fully or partially underground. Therefore, we suggest the following changes to the last sentence of the policy: <i>Existing provision must be assessed and if there is a demonstrable need to replacement some car parking, it may be supported through a more land-efficient design approach such as a multi-storey design.</i>

Reprentor	Section	Summary of Comments
Barnet Society Committee	GSS09	In the last para of the policy regarding development of car parks at existing transport hubs, a distinction must be made between stations at the end of a line or on the edge of the TfL area and stations closer in. Outer London and Hertfordshire commuters to London are drawn to High Barnet and New Barnet Stations because over recent decades bus services have atrophied or disappeared altogether, creating extra demand for car use and parking at and around those stations. 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. Recognise the distinction between stations at the end of a line or on the edge of the TfL area and stations closer in in the Local Plan.
Ropemaker Properties Ltd	GSS09	GSS09 recognises the potential for major transport infrastructure upgrades to unlock opportunities for growth and allowing higher density developments to be achieved. The Policy states that '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'. The Policy identifies potential for 950 new homes in proximity to the WLO stations. However no specific sites have been identified to deliver these 950 homes and there is no evidence to demonstrate that this is an appropriate figure which optimises site potential. It is our Client's position that the Garrick Industrial Estate lies adjacent to the WLO station at Hendon which alone has the potential to accommodate a significant number of new homes as part of a co-location scheme. NLP Policy E7 requires Development Plans to be 'proactive' in considering the potential for LSIS intensification and consolidation and the 'areas affected clearly defined in Development Plan policies maps' (our emphasis). This is important in this context because there needs to be certainty for landowners to invest in exploring opportunities for the Site. Policy GSS09 should allocate the Garrick Industrial Centre as an LSIS with potential for co-location with residential and other uses (in accordance with NLP Policies E6 and E7) and should be clearly defined as such on the Proposals Map.
TfL (Spatial Planning)	GSS09	We welcome the addition of a specific reference to supporting proposals that facilitate access to—and delivery of—the West London Orbital at Hendon, as well as seeking contributions towards its delivery. It may be helpful to express the potential number of new homes that could be supported as a minimum figure. TfL will continue to work with the Council to update this assessment. We welcome the more balanced approach to replacement parking although this could go further to ensure consistency with the new London Plan. As set out under 4.24.5, any re-provision of car parking as part of development of an existing station car park must be assessed against the same criteria as proposals for a new station with a car park. Where there is sufficient access by active travel and by bus, we would strongly urge the Council to resist the re-provision of parking except where clearly justified e.g. for disabled persons accessing the station or for operational reasons.
John Living Mill Hill Preservation Society	GSS09:	Clause 4.24.5 Within Mill Hill/Mill Hill East there is a demand for parking at the stations. The wording of the Plan is contradictory and the policy GSS09 should be expanded to require all applications to be supported by an assessment of car use and a PERS audit to maximise the efficiency of the surrounding pedestrian environment. (see accompanying letter) The clause outlines the use of station car parks for development and MHPs were concerned about the loss of car parking spaces for commuters. We note the plan now includes the sentence "Existing provision must be assessed and replacement car parking may be supported through a more land-efficient design approach such as multi-story design". This sentence and the preceding sentence are somewhat contradictory and it is necessary to ensure any developer understands exactly what is expected of them. Within the Mill Hill/Mill Hill East area, there is a demand for car parking at the stations, as many people do not rely on 'non-car' modes of transport to reach the stations before continuing their journey on public transport. The policy should be expanded to require all applications to be supported by an assessment of car use and a PERS* Audit to maximise the efficiency of the surrounding pedestrian environment. (*PERS – Pedestrian Environment Review) Clause 4.24.5: Policy should be expanded to require assessment of car use and PERS audit.
Elizabeth Silver and 18 Co-Signatories	GSS09_	Unsound: Not justified or deliverable for Mill Hill East Station Housing on the Mill Hill East station site would be incompatible with the requirement to "enhance(s) the capacity, access and facilities of the transport interchange". The enhancement is much needed because of the thousands of new housing units in Mill Hill East (2200 at Millbrook Park New Homes Shared Ownership Mill Hill WhatHouse.com , around 500 at Ridgeway Views Microsoft Word - 170925 NIMR representation hearing report.docx (london.gov.uk) and another 1500 planned for Mill Hill East (Table 5 in Reg 19). Currently 50 % of the total area (measured from the figure in Local Plan Reg 19 site 47) is taken up by rail infrastructure and parking. Reg 19 for site 47 states that 40% should be retained rail infrastructure and parking, which is a 20 % decrease from the current figure of 50%. To enhance the capacity and avoid overcrowding, the unused land should be reserved for a possible second track and platform within the station itself. To Make GSS09 Sound: Remove Mill Hill East (station) from GSS09 final para "Existing Transport Hubs".
Barnet Cycling Campaign	GSS10	We welcome the mention of active travel but recommend the phrase "promote" is replaced by "enable" and includes commitment to the aforementioned guidelines [LTN 1/20. Healthy Streets]. The phrase "appropriate level of parking" sounds worryingly open-ended.
Barnet Liberal Democrats	GSS10	1. We see no reason to conflate estate regeneration with infill. These are two very different issues and approaches. The alternative, of only including estate regeneration as a policy, is not considered.

Representor	Section	Summary of Comments
		<p>2. We do not believe estate infill should be a positive policy. Whilst there maybe occasions where this is appropriate, this should be decided on a case by case basis, as it is elsewhere in the borough.</p> <p>3. We believe that an active policy of estate infill will reduce access to green space and open space in the poorest and most densely populated parts of the borough. This will have a disproportionate impact on women, older people, disabled people and people of colour, because these groups are more dependent on their immediate surroundings and find it harder to travel to open space. We believe that this policy will widen health inequalities. We also believe that this is not consistent with the Joint Health and Wellbeing Strategy; the evidence and experience of the Covid pandemic; and the cross-border policies of NCL ICP, for whom reducing health inequalities is the number one priority.</p> <p>4. We believe that the term “sufficient” open space and play space should be defined objectively.</p> <p>Modification:</p> <p>1. We believe that the reference to estate infill should be removed, so that applications for estate infill are decided on a case by case basis, as all other applications, including infill applications, are.</p> <p>We believe there should be objective standards for open space and play space.</p>
Barratt London	GSS10	In line with the above, we would again welcome the housing target being expressed as a minimum.
Grange, Brownswell and Tarling Road Residents Association	GSS10	<p>1. We see no reason to conflate estate regeneration with infill. These are two very different issues and approaches. The alternative, of only including estate regeneration as a policy, is not considered.</p> <p>2. We do not believe estate infill should be a policy. Whilst there maybe occasions where this is appropriate, this should be decided on a case by case basis.</p> <p>3. We believe that an active policy of estate infill will reduce access to green space and open space in the poorest and most densely populated parts of the borough. This will have a disproportionate impact on women, older people, disabled people and people of colour, because these groups are more dependent on their immediate surroundings and find it harder to travel to open space. We believe that this policy will widen health inequalities (and can provide references to evidence this). We also believe that this is not consistent with the Joint Health and Wellbeing Strategy; the evidence and experience of the Covid pandemic; and the cross-border policies of NCL ICP, for whom reducing health inequalities is a number one priority.</p> <p>4. We believe that the term “sufficient” open space and play space should be defined objectively.</p> <p>Separate estate renewal and infill into two policies, with the policy on infill being that this should be decided on a case by case basis.</p>
Barnet Cycling Campaign	GSS11	An additional 3,350 new homes along Barnet’s main road corridors will add to traffic congestion unless the alternatives are much better. As mentioned in 4.26.3 and the policy, access to walking and cycling networks is vital and that means installing safe cycle tracks directly along these corridors, especially on strategic routes like the A5, A598 and the entire length of the A1000. We are engaging with the Council separately about the Experimental Lane on the A1000 and we absolutely support it being made permanent and improved.
LB Brent	GSS11	GSS11 states: ‘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.’ It does not include reference to the healthy streets for this section of the policy. Given the strategic A5 road with future major developments focused along, the policies should look into a wider strategic approach. It is currently dominated by traffic and has a poor quality public realm that would also benefit from the healthy streets initiative.
Landsec	GSS11	<p>Landsec continues to support the inclusion of a separate policy relating to the delivery of new homes along major thoroughfares. As expressed under Draft Policy BSS01, and set out in the previous section, the wording of Draft Policy GSS11 should confirm that the delivery of 3,350 homes (or preferably the Regulation 18 target of 4,900 homes) is a minimum. It is recommended that the policy is altered to read: “Such locations have capacity to deliver a minimum of 3,350 additional new homes”. This allows for flexibility to be maintained in the policy, and as set out previously, will maximise development potential and encourage the most efficient use of land in line with Para 124 of the NPPF. The Regulation 19 version introduces the following revised wording to Draft Policy GSS11: “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.” Landsec support the acknowledgement within this policy of the suitability of locations along A5/ Edgware Road and the A1000 / Great North Road Major Thoroughfares for residential led tall building development, however the current wording of the Draft Local Plan is considered inconsistent with London Plan Policy D9. Part B of London Plan Policy D9 is as follows:</p> <p>1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.</p>

Representor	Section	Summary of Comments
		<p>2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans</p> <p>3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</p> <p>The Draft Local Plan has determined there are locations where tall buildings may be an appropriate, which includes Major Thoroughfares, through the Tall Buildings Update Document (2019) which forms part of the evidence base. This is considered to satisfy the first criteria of London Plan Policy D9 Part B. With respect to the second criteria, neither the Draft Local Plan nor the Changes to the Policies Map (Reg 19) identify locations for tall buildings, and this is inconsistent with London Plan Policy D9 and therefore not considered sound. It is acknowledged that the Council intend to bring forward an emerging Height Strategy Supplementary Planning Document, however timescales for this are unknown and the Council has yet to publish a draft for public consultation. It is therefore requested that the Draft Local Plan and the Draft Policies Map is updated to clearly identify on maps all locations where tall buildings may be an appropriate, and the appropriate tall building heights. This must include the areas identified in Draft Policy CDH04, as listed below:</p> <ul style="list-style-type: none"> • 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) <p>In addition, the policy wording within Draft Policy GSS11 should be updated to reflect that sites with good public transport accessibility or those where there are opportunities to support modal shift towards more sustainable transport modes, have the potential for residential led tall building development which can revitalise these areas. In light of the above, it is requested that the policy wording to his Draft Policy GSS11 amended to read: <i>“The A5/ Edgware Road and the A1000 / Great North Road Major Thoroughfares <u>has</u> potential for residential led tall building development in certain locations, as identified on the Policies Map, optimising site availability and good public transport accessibility <u>or where there are opportunities to support modal shift towards more sustainable transport modes, providing the opportunity for revitalising these areas. Further guidance will be provided by the emerging Height Strategy Supplementary Planning Document.</u></i>” These requested amendments are considered necessary in order for the Draft Local Plan to be consistent with the London Plan and to deemed sound in accordance with the tests set out in Para 35 of the NPPF.</p>
Regal JP North Finchley Ltd	GSS11	<p>Draft Policy GSS11 identifies that redevelopment along Barnet’s main road corridors can provide a significant supply of sites for growth. It is recognised that these corridors do offer opportunities to support growth, benefiting from the public transport facilities that run along them. However, the characteristics of these corridors is variable, in some cases offering more limited access to services and facilities, especially outside of town centres. As such, we suggest that the promotion of increased density and tall buildings should be focussed to where these corridors pass through town centres, and that outside of town centres the scale and density of development needs to be carefully considered on a case by case basis.</p>
OmnIState 360 Burnt Oak Broadway	GSS11	<p>Whilst the principle of GSS11 is supported (namely the recognition of major thoroughfares to deliver significant new housing capacity within the Borough), as currently drafted it is considered this policy is unsound on the basis it is not effective. It is noted that the housing target for Major Thoroughfares has been reduced from 4,900 homes in the Regulation 18 consultation to 3,350 homes. It is considered that these thoroughfares afford a significant opportunity to meet housing needs, and therefore the policy should be clear that this represents a minimum aspiration. The draft policy states that A5 Major Thoroughfare “may have potential for residential led tall building development 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”. Whilst the principle of this is strongly supported, it is not considered to be effective in relation to London Plan Policy D9. Part B of this policy states:</p> <ol style="list-style-type: none"> 1) <i>Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.</i> 2) <i>Any such locations and appropriate tall building heights should be identified on maps in Development Plans.</i> 3) <i>Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</i> <p>As tall buildings should only be developed in locations that are identified as suitable in development plans, the policy should be very clear on what is suitable in specific locations to avoid any uncertainty.</p>

Representor	Section	Summary of Comments
		The policy should be strengthened to specifically note that tall buildings will be supported along major thoroughfares, including the A5/Edgware Road, and proposals for very tall buildings will be considered through a design-led approach. To comply with London Plan Policy D9, the policy should identify locations appropriate for tall buildings on maps in the development plan. Whilst it is noted that a Height Strategy SPD is being prepared, in the absence of this document this policy should be very clear on what is suitable in specific locations to avoid any confusion.
TFL (Commercial Development)	GSS11	TfL CD supports redevelopment of sites along main road corridors, particularly for housing delivery and at a density / scale that is optimised according to public transport accessibility (as well as surrounding context etc). We appreciate the Council's commitment to <i>"work with TfL and Highways England to help deliver appropriate sites"</i> . However, we note that support for development on the A406 North Circular is not as strong as it is for some other major roads through the borough. In particular, para 4.26.6 says that the A406 North Circular <i>"could potentially be enhanced"</i> which we consider to be unclear. We would suggest that this para is strengthened to provide a clear presumption in the Local Plan in favour of the redevelopment of unused / underused sites in suitable locations on the A406 (subject to the usual planning, heritage and environmental considerations, of course). TfL has a number of sites along the A406 North Circular that were originally acquired by the DfT for road-widening projects which were never brought forward. Beechwood Avenue is an example of one of these sites that is successfully being brought forward for housing development alongside the A406. Our site at Brentmead Place is another example, where the Council has made a draft site allocation for housing development (Site No. 31). We have other small sites along the A406 where houses were demolished after being vandalised and / or burnt; their redevelopment with replacement homes will have significant townscape and environmental benefits as well as providing much-needed additional family-sized housing in the borough. They are also in a sustainable location within easy walking distance of Brent Cross underground station. A clear planning position in the Local Plan will help us to market these development opportunities through the GLA 'Small Sites' programme and secure their redevelopment. In addition, it should be made clear that <i>"substantial public transport investment"</i> will not be required in all cases (particularly where sites are in easy reach of existing facilities or too small) and that contributions should be proportionate to the scale of development. Therefore we suggest that para 4.26.6 is amended as follows: <i>Within Barnet there are routes that are managed by Transport for London (TLRN) along parts of which could potentially be suitable for housing delivery (particularly reinstating former homes and infill development). enhanced, but In some locations it will require more substantial public transport investment (proportionate with the scale of development) alongside the healthy streets initiatives, to unlock their capacity for growth. These include:</i> • • A406 North Circular; • • A1 Great North Way/ Watford Way; and • • A41 Edgware Way / Watford Way / Hendon Way.
TFL (Spatial Planning)	GSS11	We welcome amendments to the last bullet point which now refers to 'any proposals for car parking...' as requested.
New Barnet Community Association	GSS11	Para 4.26.1 refers to Major thoroughfares within the borough and includes, on the list, the A110, East Barnet Road. While this may be an A Class Road, it cannot be described as a major thoroughfare as the road is constrained by the railway bridge at the north end which restricts movements and is height limited. This stretch of road was not recognised by TFL in 2011 as one of the 1,703 major road links within Greater London with an annual average daily flow estimate of greater than 10,000 vehicles. There are many other stretches of road within Barnet which sit within this list yet are not listed as major thoroughfares, including A502 Brent Street, and the A5109 Totteridge Lane. While the A110 Cat Hill is listed with traffic counts of approximately 16,000 vehicles per day, this is at a point where it picks up traffic coming from the A1000, down Longmore Avenue and through East Barnet Village as well as traffic coming up from the south along Church Hill Road. The count point at Cat Hill does not reflect the volume of traffic on East Barnet Road as evidenced by traffic counts taken at the junction of East Barnet Road and Margaret Road which indicated a figure below 10,000 vehicles per day. We would assert that the designation of this specific stretch of the A110 East Barnet Road as a Major Thoroughfare is both irrational and without evidence and would ask that East Barnet Road is removed from para 4.26.1.
Barnet Cycling Campaign	GSS12	The proviso that car parking spaces will be released 'if surplus to requirements or re-provided' will not deliver the sort of change needed to achieve other policies on active travel and climate change.
Brad Blitz	GSS12	The Draft Local Plan Reg 19 Cites Policy GSS12 Redevelopment of Car Parks as one basis for the proposed developments in Hendon – one of the proposed town centres. The Draft Local Plan states: 4.27.3 2In 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 the 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". P77. There are currently 141 residential premises, 49 businesses, two schools and two churches which rely on approximately 60 car parking spaces. The proposed development of the Burroughs Gardens car park and the Burroughs car park for the residents living in the listed buildings of the Burroughs and the Burroughs Gardens and the small businesses located there, where is there is no on street

Representor	Section	Summary of Comments
		parking available. The Good Growth policies of the London Plan emphasise the need to protect character and heritage. "London's distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special feature that Londoners value about a place, such as cultural, historic or natural elements, can be used positively to guide and stimulate growth, and create distinctive, attractive, ad cherished places" (see 1.2.7). The proposals by virtue of their size, scale and density pose major threat to the character and heritage of the area. This fact has been recognised by Historic England to two letter submitted to the Council on 22 February 2021 and 19 July 2021 where the heritage body identifies significant harm resulting from the proposed developments in the two conservation areas, including the proposed alterations to the Hendon Library, and the erection of unsympathetic buildings on the Burroughs and more importantly, the overdevelopment of buildings on Church End, overlooking the ancient church.
Brad Blitz	GSS12	I am a long-term resident and live within one of the conservation areas that will be affected by the proposed developments. Since January 2021 I have alerted Barnet to the improper way in which consultations over the redevelopment scheme have been conducted, including the failure to engage with Historic England. LB Barnet has further withheld significant information from residents, which has hampered the process of effective consultation including over the Local Plan Reg. 19. I note that as of 8 August 2021, just as we are asked to provide specific references to policies, paras, and figures/tables, LB Barnet has failed to post each of the policies listed in the Local Plan on its website. They are simply not available for scrutiny. I have read many of these policies, but do not have all to hand, so cannot at this point indicate the exact places where the Local Plan Reg. 19 is not legally compliant, and is unsound, and where it violates the duty to co-operate. I can do so however in order to assist the inspector and believe it is necessary to participate in the examination hearings.
Landsec	GSS12	Landsec continues to be in general support of LBB's intention to support the redevelopment of existing surface level car parks for residential and other suitable uses. Draft Policy GSS12 is considered to reflect London Plan Policy H1 and SD7 which also support mixed use redevelopment of car parks and low-density retail parks and supermarkets. GNLP currently includes a large surface car park which provides parking for the leisure facilities on the site. It is noted that an additional assessment criterion has been introduced into this Policy to require that development 'demonstrates how the use of public transport and active modes of travel will lead to reduced car park usage'. Landsec has no objection in principle to this additional criterion. As part of its redevelopment, Landsec will be looking to reconfigure GNLP in order to make the most efficient use of land, with specific levels of car parking to be appropriately determined at subject to the nature of the development and the uses which are proposed. The nature of the proposals, discussed in further detail within this Letter, will result in an overall reduction in car trips associated with the existing leisure park, which is considered to accord with this Draft Policy. In addition, this Policy also now states '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'. Landsec consider that the need for, and scope of, any parking strategy should be subject to discussions with planning and highway officers at pre-application stage and should be proportionate to the proposed change in car parking quantum and the uses which are proposed as part of any future redevelopment proposal.
Regal JP North Finchley Ltd	GSS12	Policy GSS12 relates to the redevelopment of surface level car parks. Regal JP support the thrust of the policy which seeks to optimise the use of underutilised land. The policy sets out three criteria, the first of which is that the design 'preserves' the amenity of neighbouring uses. We question whether 'preservation' is the correct test for this policy, for example if building set back distances were reduced as a result of redevelopment that could fail the 'preservation' test despite the set back distances being consistent with wider policies/guidance. As such we propose 'preserves' be replaced with 'has regard to' the amenity of neighbouring uses.
FORAB	GSS12	This policy is bullish about redevelopment of car parks. We recognise that, on the face of it, they do represent inefficient use of land in prime locations. But the council is also committed to supporting the commercial well-being of town centres, which have endured many difficulties over recent years. So there is a potential conflict. The second bullet point in the policy indicates that development will be supported if it can be demonstrated "how the use of public transport and active modes will lead to reduced car park usage". It is obvious that if alternative uses are employed car usage will fall, that does not need to be demonstrated. The issue is whether usage would fall. It is not sufficient to simply assert that other modes exist The third bullet point refers to redevelopment being acceptable if spaces are being re-provided. This ignores the potential impact of the spaces not being available for a considerable period of time whilst redevelopment takes place. Once motorists change their shopping habits it may be very difficult to entice them back. This policy should be far more cautious re the potential damage to the commercial viability of town centres. We have no difficulty with redevelopment if it can be demonstrated that parking is surplus to requirements, but the elements in the policy regarding alternative means of transport and re-provision after development should be removed. They should be replaced with something along the lines of "For parking currently in use any consideration of permanent or temporary removal to facilitate redevelopment of the site should be subject to an analysis of the potential impact on the well-being of any nearby commercial activity.
TFL (Commercial Development)	GSS12	TfL CD supports the re-development of publicly accessible surface level car parks for residential and other suitable uses

Representor	Section	Summary of Comments
Barnet Society Committee	GSS12	We are concerned that the need for car parking in edge-of-London locations may be greater than elsewhere in Barnet, because centres such as Chipping Barnet have to compete with Potters Bar, Hatfield, London Colney and Borehamwood, which are easier to reach by car. This is likely to be exacerbated by the major developments around the M25 being proposed by Hertsmere. We also support the views submitted by the Federation of Residents' Associations of the London Borough of Barnet (FORAB). Require transport assessments for edge-of-London locations to factor in developments outside the borough boundary.
TFL (Spatial Planning)	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. We welcome the inclusion of this policy and the more nuanced approach, but the wording could still give much stronger encouragement to remove or reduce parking as part of redevelopment proposals particularly where sustainable alternatives exist. Re-provision should only be considered where it is essential e.g. for disabled persons parking or for operational reasons
Theresa Villiers MP	GSS12	I oppose this policy. Residents and local businesses need car parks. Building over car parks will make life harder for residents in a borough which the council acknowledges is car-dependent. Lateral cross borough public transport is limited and many people, especially the elderly and people with young children, depend on their cars for many journeys. A policy supporting building over car parks will have an especially negative impact on disabled people and is out of line with the council's equalities duties. I am particularly concerned about car parks at stations such as High Barnet, Cockfosters, Finchley Central. It is vital that these are retained because they perform an important park and ride function encouraging public transport use. The Mayor of London's proposals to replace the car parks at these stations with high density blocks of flats are completely unacceptable. The fact that there will be no off-street parking for these new flats will mean great pressure on surrounding roads already crowded with parked cars. Additionally, as pointed out by the Barnet Society, this problem will be exacerbated by the major developments around the M25 being proposed by Hertsmere. And in their comments on GSS09 (Existing and Major New Transport infrastructure), they point out that a distinction must be made between stations at the end of a line or on the edge of the TfL area and stations closer in. The council should review this part of the plan and reconsider its support for developing station car parks for residential use. Also distinguish between those stations at the end of a line or on the TfL area and stations closer in, in the Local Plan. I wish to stress the importance of retaining car parks. The council needs to take into account developments in nearby boroughs that will impact on Barnet's need for parking provision at transport hubs.
CPRE London	GSS13	A Regional Park for Barnet based on the Green Belt is very much supported however the draft plan does not include specific proposals on how and when it will be delivered. We propose a clear statement should be included in the Local Plan stating on how this is to be progressed including adding it to the key diagram, proposals map and identifying the resources to create it in the Draft Barnet Infrastructure Delivery Plan.
Barnet Cycling Campaign	GSS13	We support the establishment of a Regional Park within the Brent Valley / Barnet Plateau area but ask for fuller details of what is proposed. We ask for good cycling facilities through the park. We support the idea of developing the Strategic parks at King George, Cophthall and West Hendon with dedicated cycling routes within. There should also be safe cycling routes to these parks so that people can cycle to them as well.
Barnet VCS Environmental Network.	GSS13	Regional Park for Barnet based on the Green Belt. (Policy GSS13) This idea has been around for many years but there is nothing specific on how and when it will be delivered. The messages given in the plan on this idea are garbled. We propose a much clearer statement MUST be included on how this is to be progressed including adding it to the key diagram, proposals map and identifying the resources to create it in the Draft Barnet Infrastructure Delivery Plan.
Barnet Liberal Democrats	GSS13	<ol style="list-style-type: none"> 1. We believe that local access to natural spaces, pocket parks, and local play spaces are more important to people's quality of life, health and wellbeing and activity levels than large strategic parks and recreation centres. This is particularly true of those from poorer socio-economic backgrounds, older and disabled people, who may not have the time or money to travel to large strategic centres. Whilst strategic parks are certainly desirable, a policy around parks and recreation should forefront these vital, small, local spaces. 2. We are concerned that, at a policy level, strategic parks and recreation should pay particular attention to equalities issues, specifically the work of Make Space For Girls, and inclusion of disability sports. 3. We believe putting local, accessible green spaces, open spaces and play spaces at the heart of the policy will respect the child's right to play (Article 31 UNCRC). Barnet has put the UN Convention on Rights of the Child at the heart of their policy. 4. The draft only considers no policy as an option, rather than alternative policies which put health and other inequalities at the heart of the policy. 5. 5. We believe these small open spaces are important to protect against urban heat islands and also flash floods. <p>Modifications: Protection of pocket parks and small open play spaces, particularly in areas of high density. Objective standards of open space and play space</p>
Elizabeth Silver and 18 Co-Signatories	GSS13	Contravention of NPPF 2021 para 16d (due to ambiguity), and paras 137 and 174a There is ambiguity in GSS13, and therefore unsoundness, which may permit indoor facilities to be built in a new Regional Park on Green Belt (GB) and Metropolitan Open Land (MOL). If indoor "leisure and recreational facilities" facilities are built to "improve the utilisation of an open space" in a new Regional Park within designated GB or MOL, this will decrease the natural habitat and its biodiversity. Structures such as car parks, tennis courts and visitor centres could be built in the name of 'access', thereby affecting the openness and permanence of the GB, so that part of the GB or MOL becomes a brownfield site. There are precedents for this in Mill Hill - invoking NPPF

Representor	Section	Summary of Comments
		2021 para 149b has not been a sufficient safeguard to prevent Green Belt becoming brownfield. .To make the Policy Sound: Para 2: add at the end: “New indoor facilities should not be built within Green Belt or Metropolitan Open Land “ Para 4: “Care should be taken that improved access should not lead to a loss of openness and natural habitat in the park.”
Barnet Green Spaces Network	GSS13, Para 4.28.4, & ECC04	The population of the Borough is set to rise by 50,000 people during the lifetime of this plan. The concept of a new Regional Park has been around for at least 10 years and there is no sign yet of any positive movement to bring it to fruition. The recently released Infrastructure Delivery Plan makes no mention of the Regional Park. Warm words that the Borough will “promote a new regional Park” in both policies mentioned above will not make it happen. The impression is given that this idea is being batted off into the long grass. Firmer policy wording is required in both GSS13 and ECC04 to the effect that: “A new regional park within designated Green Belt and/or Metropolitan open land in the Brent Valley and Barnet Plateau is a vital open space infrastructure element required to support the population growth of the Borough. A masterplan will be drawn up within the first three years of the plan period with an expectation that the park will be substantially complete by 2030.” In addition the Infrastructure Delivery plan should include a clear commitment to the expenditure required to develop the regional park and an indication of where that money is likely to come from – probably CIL. The Regional Park is a vital component of the infrastructure required to support the plan yet there appears to be a reluctance to ‘promote’ the Park and indicate a clear timescale for its completion.
Barnet Green Spaces Network	GSS14 & ECC06	There is need to recognise the emerging climate crisis and the adverse impact that climate change is and will continue to have on our wildlife and biodiversity. The plan needs considerable strengthening in this regard and does not fully take account of the growing evidence in this area and the rapid and wide-ranging changes that are needed to tackle the problems we will face in the plan period from a changing climate. COP26 will take place following the end of the consultation period on the plan but it can be easily anticipated that this will throw out more evidence of the problems we will confront and issues we will need to address to rectify the situation. Rewilding is one principled approach that is beginning to help to address some of the adverse impacts on our wildlife with examples at Knepp Estate in Sussex and the reintroduction of Beavers into the river systems at Tottenham and work in the adjacent borough of Enfield. Introduce a new strategic policy on Rewilding GSS14 Rewilding Support will be given to all proposals where wildlife recovery and easy access to nature for people are at their heart. The intertwined ecological and climate crises will, in part, be addressed, by protecting land that’s in recovery. A new designation - a Wildbelt – will be introduced, through the Barnet nature recovery plan, to appropriate areas in the Borough. Residents and other stakeholders will be encouraged to engage in design and decision-making at all stages and will have the information they need to understand the impacts of plans on nature and on communities. Decisions will be based on accurate and up-to-date ecological data, with a full program of investment in place, as set out in the Infrastructure Development Plan, to gather, analyse and hold data appropriately. Introduce addition to Policy ECC06 Biodiversity a1) supporting proposals for Wild belts, land specifically designated as places for nature recovery. Add appropriate supporting text in para 10.26.5 “wild belts”, will be designated which will be land protected from development and managed to allow the recovery of nature. A Barnet Nature recovery Plan will be prepared in the next 18 months in conjunction with local communities. Rewilding is a relatively new concept for planning and this needs to be explored and developed through examination to make it as strong as possible to ensure that we can begin to address some of the severe problems that the Climate Emergency is having on our wildlife and biodiversity.
LB Brent	Map 3	For clarity and consistency, it will be useful to label this map as Brent Cross/Cricklewood Opportunity Area. In addition, it will be useful to amend the map and add what site 7 and site 8 are within the map key. Marking the LB Barnet boundary, LB Brent boundary along with road name/landmarks will also assist in understanding the map and strategic importance better.
Brent Cross South Limited Partnership (‘BXS LP’),	Map 3	The heading to the map key should be ‘Brent Cross Growth Area’, and Brent Cross Town is still labelled as ‘Brent Cross South’. The map key should be amended for clarity.
LB Brent	Table 3	The council notes that this table has been revised following Reg 18 consultation. NPPF Para 21 requires Plans to make explicit which policies are strategic policies. To support this, Para 20 has a list of criteria. Based on this criteria and further reference in NPPF para 21/22/23 on strategic and non-strategic policies, LB Brent considers that some policies not identified as strategic policies are strategic. The list of policies below are considered as strategic matters as they set out an overall strategy for the pattern, scale and quality of development. In line with the presumption in favour of sustainable development, strategic policies are also those that make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement of natural, built and historic environment. NPPF Para 21 also highlights that strategic policies address the strategic priorities and relevant cross-boundary issues. LB Brent considers the following policies strategic policies based on NPPF Para 20/21/22/23. Proposed modification Strategic policies: Policy CDH01 Promoting High Quality Design, Policy CDH02 Sustainable and Inclusive Design, Policy CDH03 Public Realm, Policy CDH04 Tall Buildings, Policy TOW01 Vibrant Town Centres, Policy TOW04 Night –Time Economy, Policy CHW01 Community Infrastructure, Policy ECC02 Environmental Considerations, Policy TRC01 Sustainable and Active Travel, Policy TRC02 Transport Infrastructure, Policy TRC03 Parking management

Representor	Section	Summary of Comments
Brent Cross South Limited Partnership ('BXS LP'),	Table 5	We query whether the indicative homes delivery for Brent Cross Growth Area is correct, given that 9,500 is the indicative capacity set out in the London Plan for the Brent Cross/Cricklewood Opportunity Area as a whole (including Brent Cross West and Cricklewood Growth Areas). The outline permission for the Brent Cross Growth Area controls residential uses by floor area (rather than units), but provides an indicative unit number of around 7,550. Notwithstanding this, the eventual residential output will be determined at detailed design stage and owing to the fact that BXT is set to deliver a range of residential products, any figures in this table should be referenced as a minimum, and this should be made clear in Table 5 (see comments regarding site optimisation in Policy GSS02 below).
Sanjay Maraj	Para 5.12.1	5.12.1 highlights a number of factors that has led Barnet to make changes, however, the policy only appears to be taking action at the application stage and there does not appear to be anything in the policy where the council seek to uphold the standards set out in the HMO licencing application process The policy should also include more on how the council will enforce the standards. For example, the two HMO's on our road are full of occupants (one of them for the last 15 years) and yet the exterior, and interior, of the houses have been neglected. There is also the opportunity to improve standards of HMO landlords perhaps by introducing a council ranking based upkeep, tenant and neighbour surveys...this scheme would ensure the negative aspects of HMO's are addressed.
Dr Elizabeth Kliman	Para 5.13.2	The point made in this para is 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)', However this is highly unlikely to be true as halls of residence are normally provided mainly for first year students. If a substantial number of students (1712 students are the proposed number- which is an extra 954) are housed in Hendon on the first year of their university course, it is highly likely that they will seek housing in HMOs for the further two years of their university career. This is indeed what is currently occurring and it is unlikely that this will change. This is likely to increase the number of HMOs in Hendon and greatly impact on the residential nature of the local community. It is highly likely that this will further increase antisocial behaviour in residential areas, for example, on Station Road, which is close to the university there are currently several HMOs and there are young people around these HMOs who are drinking alcohol and using cannabis outside on the street, leading to further antisocial behaviour such as shouting abuse etc. This is a residential street with a number of children. This local plan would result in the introduction of 1712 students to be domiciled in the area: 758 currently, 180 in newly council-approved private rooms, 774 in new blocks. This figure does not include private HMOs. The result of this would be to dramatically change the demographic of the area, so much as to be detrimental, replacing established residential neighbourhoods with transient ones. London Plan (March 2016) Policy: 2.6: Outer London: Vision and Strategy recognises that one of the key opportunities for Outer London is maintaining and enhancing the high quality of life that is already there. Delivery of "lifetime neighbourhoods" is an important part of preserving this quality of life. If Middlesex is allowed to dominate the area, Hendon residents will be excluded from every single civic building on The Burroughs. I am also concerned that carparks will be removed to allow this development, this will mean that there is additional parking pressure on residential roads leading off The Burroughs would negatively impact those residents. This would directly impact on Station Road which is opposite the Boroughs in which there are already non-residents who park, due to limited parking restrictions. This impacts on visitors being able to park nearby. This will be further impacted by Mencap being moved to Station Road. This will prevent delivery drivers from parking and visits by professionals to residents as there will be limited parking available. Less students should be housed in what is a residential area. There is no infrastructure for accommodating 1712 students as is proposed, which in practice is an additional 954 students. It is likely that this would impact on the local shops available to residents and would impact on the use of public transport- public transport is inadequate to support this increase in students. The influx of so many students living in the area would dramatically change the demographic of the area, so much as to be detrimental, replacing established residential neighbourhoods with transient ones. If the plan were to go ahead, there would need to be a clear plan to house students in their second and third years of university in a way that diverts them away from seeking housing in HMOs in Hendon. If the plan goes ahead street parking on Station Road should have longer restricted hours, with day permits being made available to residents free of charge for their visitors. Mencap should have parking onsite only and not use residential street parking spaces. There is ample opportunity for Middlesex University to develop its campus within its own footprint.
Brent Cross South Limited Partnership ('BXS LP'),	Para 5.17.2	This para refers to a Build to Rent scheme being supported, however there appears to be no justification for why this is expressed in the singular. It is suggested that this para is amended, as follows: <i>As part of the Council's plans for <u>the Brent Cross Growth Area</u> delivery of a Build to Rent scheme development 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).</i> Clarity is also required in relation to the Discounted Market Rent levels required as part of the Council's BtR policies. Our suggested wording is as follows, to align the Plan with the London Plan Policy H11: <i>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, with at least 30% provided at London Living Rent levels and the</i>

Representor	Section	Summary of Comments
		<i>remaining 70% at a range of affordable rents. Rents for the remaining 70% should have regard to the relationship between the level of discount required and local affordability, as well as the viability of achieving the 35% policy target.</i>
Brent Cross South Limited Partnership ('BXS LP'),	Para 5.2.4	This para refers to First Homes, however the Housing section provides no further clarity on the Council's position in respect of discount levels and affordability. We suggest further detail is provided as to how the Council intends to implement the Government's First Homes initiative.
Brent Cross South Limited Partnership ('BXS LP'),	Para 5.4.7	This para notes that assessments should be undertaken in line with the Mayor's Affordable Housing and Viability SPG. The determining authoritative source in relation to planning viability matters remains Central Government Planning Practice Guidance (PPG), with the guidance provided by the Mayor supplementary to this. Suggested amendments as follows: <i>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 NPPF, the Planning Practice Guidance, and the Mayor's Affordable Housing and Viability SPG.</i>
Home Builders Federation	Para 5.5.10	The Council's approach to the housing mix in the borough is questionable and contrary to the London Plan. The London Plan identifies that the greatest need in the type of homes between 2018-2041 is for one-bedroom homes – 55% of the overall supply (market and affordable). This is set out in the GLA SHMA 2017 that informed the new London Plan. See table 1 on page 6. The Council prefers instead the conclusions from its own local SHMA 2018 which considers the greatest need is for three-four bed homes in both the market and affordable houses elements. In contrast to the London Plan, the Council considers that the need for one-bedroom homes is just 6% in the market and 13% of affordable housing supply (see table 6 of the Local Plan). As we have previously argued, London is a single housing market area. This means that supply in Barnet will contribute to meeting wider-London needs. The assessment conducted by the GLA also uses consistent judgements and precludes the need for local assessments. The Council, therefore, needs to be careful about making prescriptive policy about the size mix of homes.
Brent Cross South Limited Partnership ('BXS LP'),	Para 5.5.7	This para refers to one-bed units being the 'least flexible forms of accommodation', however there should be some recognition that they are suitable for specific types of accommodation such as BtR. We suggest this para is amended as follows: <i>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. <u>Notwithstanding this, well-planned single person dwellings have an important role to play in reducing dependence on HMOs and attracting those wanting to downsize from their existing homes, and are appropriate for Build to Rent schemes, where demand for new rental stock is much greater for one bedroom dwellings than in the owner-occupier or social/affordable rented sectors.</u></i>
Landsec	HOU01	Between 7th February and 1st May 2020, the Government consulted on a new affordable housing product known as First Homes. First Homes is a scheme to provide homes for first-time buyers that are discounted by a minimum of 30% against the market value. On 6th August 2020, the Government published a summary of the consultation responses, and following the May 2021 Ministerial Statement, substantial changes to planning policy came into effect on 28th June 2021. Local Plans and Neighbourhood Plans that have submitted for Examination or reached publication stage before 28th June 2021 are not required to reflect First Homes policy requirement. While Para 5.2.4 of the Draft Local Plan acknowledges affordable housing may include First Homes, the Draft Local Plan Policy HOU01 does not provide any clarity of the Council's intended application of this. It is requested that the Council provide further clarity on the application of First Homes within Draft Policy HOU01.
Joe Henry	HOU01	The policy does not confirm/clarify that a lesser provision would be appropriate if a viability appraisal demonstrates a proposal would not be viable if affordable housing was provided to meet policy requirement.
Philip Greene	HOU01	I am concerned about the proposal to build 556 units of affordable housing in the immediate vicinity of Finchley Central Station. This will include tall tower blocks located close to the railway line at the top of Station Road and on the other side of the railway bridge. Significant buildings are proposed on the north side of the bridge behind Dollis Park as well as in the station car park. I understand the need for more housing in the Barnet area, however this proposal involves a large number of units in a very small space, and the proposed large tower blocks would be seriously detrimental to the environment and to the area. The actual construction is likely to cause massive disruption along Ballard's Lane and Regents Park Road causing increased traffic chaos, and air pollution as well as serious overload on the existing amenities and services of Finchley Central. I am therefore raising my objection to this proposal. I suggest finding alternative sites for this project.
Hill Residential Ltd & Trustees of Gwyneth Will Trust &	HOU01	The Council's threshold approach to viability in accordance with the London Plan Policy H5 and the principle of affordable housing, and for new homes to be genuinely affordable, subject to viability. We note that Policy HOU01 (Affordable housing) sets out thresholds and criteria in the provision of affordable homes. Hill and Trustees support the draft policy's approach that the provision of affordable homes is subject to viability.

Representor	Section	Summary of Comments
Gwyneth Cowing 1968 Settlement		<p>In terms of the affordable housing tenure mix, it is essential to ensure that a flexible approach is taken, subject to the site specific circumstances. Therefore would consider a flexible approach should be taken, and that the following additions (shown underlined) should be added to Policy HOU01:</p> <p><u>A flexible and end-user driven approach to housing mix should be taken when considering comprehensive redevelopment proposals.</u></p>
McCarthy and Stone Retirement Lifestyles and Churchill Retirement Living	HOU01	<p>Affordable Housing requirements in the Barnet Local Plan are linked to the corresponding policies in the London Plan – namely Policy H4: Delivering affordable housing. This sets a strategic target of 50% of all new homes in London to be ‘genuinely affordable’ with a 35% affordable housing requirement for residential developments that fulfil the requirements of the threshold approach detailed in Policy H5: Threshold approach to applications.</p> <p>Policy HOU 01: Affordable Housing seeks a minimum of 35% affordable housing from all developments of 10 or more dwellings, across the Borough, in line with the threshold approach. The wording of Policy HOU 01 and its supporting text makes it clear that a non-policy compliant level of affordable housing will only be allowed in exceptional circumstances stating that: 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. It is clear from the wording of the policy and its justification that the Local Authority is cognisant of the increased emphasis on Local Plan viability testing in Para 54 of the NPPF. Given the Council’s stance towards developer contributions and affordable housing, we find aspects of the evidence base underpinning these policies to be concerning. The affordable housing targets detailed in the above policy are informed by the Barnet Local Plan Viability Study undertaken by the BNP Paribas and the London Plan Viability Study (2017) and its corresponding addendum (2018) undertaken by Three Dragons and Turner & Townsend. In reviewing the Barnet Local Plan Viability Study we note that no viability appraisals were undertaken for specialist older persons’ housing typologies – namely Sheltered Housing and Extra Care accommodation. This is disappointing and considered to be contrary to both best practice and the typology approach detailed in Para: 004 (Reference ID: 10-004-20190509) of the PPG which states that. “A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. This would mean that the viability evidence underpinning the 35% affordable housing requirement is that of the London Plan. The respondents, as part of a Retirement Housing Consortium, have consistently voiced their concerns about the Mayor of London’s threshold approach and the viability evidence underpinning this. These concerns were presented during the EiP, however despite the Examiners acknowledging our concerns the London Plan Examination in Public: Panel Report (October 2019) concluded that ‘The threshold requirements for affordable housing have been challenged, on the basis of the higher build costs compared with mainstream housing. This is reflected in the findings of the LPVS, which indicates that viability for sheltered and extra care housing is more difficult in lower value areas. Further the case studies tested for this type of housing in the LPVS do not reflect industry practice. For these reasons, we are not convinced that viability would not hamper delivery. However, in light of the significant need for affordable homes and given that the “viability tested route” is available to assess the impact of viability on affordable housing requirements, it is worth waiting to assess the impact of this new policy approach. However, close monitoring should take place to ensure that the impacts are properly assessed and fed into any review. This ‘wait and see’ approach does not accord with the increased emphasis for the viability of planning obligations to be tested, robustly, at the Plan making stage. The London Plan was assessed with regard to the policies in the 2012 version of the NPPF, and other relevant policy under the transitional arrangements detailed in NPPF (2019) para 214 and footnote 69. It was not assessed against the revisions to the NPPF made in 2018, 2019 or 2021. The London Plan’s approach, particularly in respect of development viability and affordable housing contributions, is not considered to be consistent with that of the NPPF (2021). While the respondents will not reiterate the point made in their submissions to the London Plan, they remain strongly of the view that the viability assessments for older persons’ housing typologies in the London Plan Viability Study were not fit for purpose and substantially overstated the viability of these forms of development. Notwithstanding the respondents concerns with The London Plan Viability Study, we note that it concluded that the viability of older persons’ housing was considered to be particularly finely balanced in the outer London Boroughs (Value Bands D & E): Other residential development types This group of uses includes specialist provision for the elderly and others needing sheltered or extra care facilities and for care homes. It also includes student accommodation and another relatively new form of provision – Shared Living. Generally, all these types of uses are viable and able to provide affordable housing (when required to do so). However, there are considerable differences in viability between the uses. The policy requirements for student accommodation and Shared Living can be met across the value areas. Sheltered housing is able to provide 50% affordable housing in Value Band C, but not in D or E. Extra care, as was tested for this study, was viable with 35% affordable housing in C but not in D or E. (Emphasis own). The need for specialist older persons’ housing across Greater London is detailed in Table 4.3 of the London Plan which requires the Borough 275 units of specialist older persons’ accommodation per annum. The Barnet SHLAA goes on to further assess this need and breaks it down into type of accommodation detailed in Table 8 – Additional Modelled demand for Older Persons Housing up to 2036 in the supporting text for Policy HOU 04: Specialist Housing of the Barnet Local Plan review. Barnet’s Annual Monitoring Reports (AMR) do not currently monitor the delivery of specialist older persons’ housing in the Borough. The Knight Frank Senior Housing Update 2021 is however a useful reference in this respect and highlights the London Plan target for an additional 4,115 units of</p>

Representor	Section	Summary of Comments
		<p>specialist older persons' housing per year across the capital up to 2029. Since the start of the London Plan timeline in 2017 however, only 3,000 seniors housing units have been delivered – less than the requirement for one year. There are a further 1,600 further units either under construction or with planning granted across Greater London, which will do little to address the shortfall. In light of the urgent need to significantly increase the delivery of specialist older persons' housing in the Borough and across Greater London, we consider that it is imperative that the viability of these forms of development is careful robustly against planning obligations and policy requirements. Mindful of the guidance in the PPG that is the responsibility of site owners and developers to engage in the Plan making process – McCarthy Stone and Churchill Retirement Living have provided a separate document with viability appraisals for sheltered and extra care older persons' housing typologies. It concludes that these forms of development are not able to provide an affordable housing contribution on previously developed land in the Authority..The PPG makes it clear that 'Different requirements may be set for different types or location of site or types of development' (Para: 001 Reference ID: 10-001-20190509). We are strongly of the view that it would be more appropriate to set a lower, potentially nil, affordable housing target for sheltered and extra care accommodation in the Borough. We are of the view that as The London Plan was assessed against the NPPF (2012) and the Barnet Local Plan Review will be determined against the NPPF (2021), with its increased emphasis on robust viability assessments at the plan making stage, it is the Borough's responsibility to ensure its planning obligations regime is sufficiently robust and justified. The Local Plan is therefore considered to be unsound on the grounds the affordable housing targets are not justified, positively prepared or effective. The respondents as part of a Retirement Housing Consortium have consistently voiced their concerns about the affordable housing threshold approach and the viability evidence underpinning this in the London Plan. As the Barnet Local Plan Review will be determined against the NPPF (2021), with its increased emphasis on robust viability assessments at the plan making stage, it is the Borough's responsibility to ensure its planning obligations regime is sufficiently robust and justified. The evidence we have provided in our viability appraisals for Sheltered Housing and Extra Care Housing typologies, concludes that these forms of development should be exempt from affordable housing provision.</p>
Barnet Liberal Democrats	HOU01	<ol style="list-style-type: none"> 1. We are unclear why the target for affordable housing has been lowered to 35%, particularly when the London Plan has demanded a higher target. We believe the evidence base for this is poor. 2. High housing costs are the main reason why a higher percentage of families on a low income are living beyond their means than in any other London borough, according to work done by Policy in Practice before the pandemic. We believe there is a risk that HOU01 would fail an equalities impact assessment. 3. Levels of child poverty in the borough are significantly impacted by housing costs – see Fig 4 Barnet's Child Poverty Strategy, taken from the End Child Poverty Coalition. We believe that it may conflict with Article 27 UNCRC. 4. We do not believe it is consistent with the policy of North Central London Integrated Care Partnership to focus on reducing health inequalities. 5. We do not believe it is consistent with London Plan targets of 50% affordable housing. <p>Modifications: We believe current percentages of new developments should be retained – 50%.</p>
Brent Cross South Limited Partnership ('BXS LP'),	HOU01	<p>Part a) refers to the 60% Low Cost Rent component including 'Affordable Rent'. However, para 5.5.11 then refers to Affordable Rent as a form of intermediate housing. We request that this is clarified. Affordable Rent is a distinct low-cost rental product, as noted by the NPPF at Annex 2, however at para 5.4.3 it appears to be used as an umbrella term for homes let at social rent and London Affordable Rents. We suggest the umbrella term adopted is aligned to the policy wording and uses 'Low Cost Rent', but which at para 5.4.3 also includes reference to the Affordable Rent product.</p>
Berkeley Group (on behalf on St James Group Limited/St William Homes LLP	HOU01	<p>St William support the Council's objective to support safe, strong and cohesive communities and improve the quality of housing in Barnet and supports the council in its aim to deliver a range of homes and increase access to affordable, good quality homes. Former Gasworks sites are unique in both use and character; they are challenging and abnormally expensive to regenerate compared to delivery of development on other brownfield sites; 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. The specific viability challenges to bring former utility sites forward needs to be carefully balanced to ensure these redundant brownfield sites fulfil their potential and contribute to an areas housing need. Draft policy HOU01 should make reference to exceptional cases such as this, where a more flexible approach may be needed. For conformity reasons, policy HOU01 and supporting text will also need to reflect footnote 59 of the London Plan which highlights the unique challenges of former utility sites; it recognises that 'some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35% housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available'</p>
Finchley Society	HOU01	<p>'seek' in the first sentence is far too weak, and could easily be ignored by developers. replace 'will seek' by 'will not accept less than 35% without convincing reasons'. The supporting text should give examples of convincing reasons. The provision of sufficient affordable housing throughout London is of great importance, and the part Barnet will play in this needs full scrutiny.</p>

Representor	Section	Summary of Comments
TFL (Commercial Development)	HOU01	TfL CD notes the policy and will always look to achieve this in the borough except in cases when scheme viability challenges would make it impossible. We appreciate the changes that have been made to reflect our comments at Reg 18.
Clarion Housing Group and the Huntingdon Foundation	HOU01	Draft Policy HOU01, is considered unsound on the basis of NPPF (2021) Para 35 on the basis it is it unjustified and ineffective. It fails to make reference to London Plan (2021) Policy H5 and the associated supporting text does not explicitly confirm whether LB Barnet will implement the Mayor's Fast Track approach to viability in accordance with the London Plan (2021). Draft Policy HOU01 and the associated supporting text should be modified to accord with the Mayor's Fast Track approach and allow the policy to be effectively implemented alongside London Plan (2021) Policy H5. The policy wording should be explicit that LB Barnet will implement the Fast Track approach in line with London Plan (2021) Policy H5 to ensure it is sound, positively prepared and consistent with the London Plan (2021). Draft Local Plan Para 5.4.9 states: "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". Para 5.4.9 fails to confirm whether the 'Threshold Approach to Applications' will be applied when LB Barnet assess development proposals and their associated affordable housing provision. Draft Local Plan Para 5.4.10 states: "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". Para 5.4.9 and the supporting text set out in relation to Draft Policy HOU01 fails set out how LB Barnet will assess the viability and affordable housing offer of scheme that achieve or exceed the affordable housing target. London Plan (2021) Policy H5 allows affordable housing led schemes with an alternative tenure split to follow the fast track route. Policy H5 (D) states that: "Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant." London Plan (2021) Para. 4.5.10 expands upon the Policy H5: "To incentivise schemes with a high proportion of genuinely affordable housing, schemes that propose 75 per cent or more genuinely affordable housing may be considered under the Fast Track Route whatever the affordable housing tenure mix, where supported by the borough and, where relevant, the Mayor. This should be determined on a case-by-case basis having regard to the housing need met by the scheme and the level of public subsidy involved." Draft Policy HOU01 and the associated supporting text is as drafted considered unsound on the basis it fails to adequately demonstrate consistency with the London Plan (2021). Draft Policy HOU01 should be modified to accord with Mayor's Fast Track approach and allow the policy to be implemented alongside London Plan Policy H5. Draft Policy HOU01 should be explicit and state the following (or similar): " <i>Development proposals may follow the Mayor's Fast Track approach where they meet or exceed the relevant threshold level of affordable housing on site in accordance with the provisions set out in London Plan (2021) Policy H5. Development proposals which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is considered acceptable and would effectively contribute towards meeting housing needs. Fast tracked application will not be required to provide a viability statement at application stage</i> ".
Joe Henry	HOU02	Table 6 on page 91 is not based on need or demand. The small percentage of 2-bedroom units (24%) does not take into account that 2-bedroom units provide family sized housing. A high percentage of 3–5-bedroom dwellings (70%) is not justified. 3–5-bedroom dwellings are out of the price range for the majority of people. Therefore, having a policy requiring a high percentage of large units would only increase significant competition for smaller units and lead to more affordability issues – this has not been thought through properly. A high percentage of 3–5-bedroom dwellings (70%) would lead to many potential developments being unviable therefore leading to less housing provision and less affordable housing provision. The proposed mix does not take into account the projection in the increase in the number of single person households. The significant reduction in the number of 1-bedroom units would force people to live in HMO accommodation which is not a good standard of accommodation - there needs to be a surplus in supply in 1-bedroom units to ensure people have the opportunity to step from HMO accommodation into secure self-contained housing. The policy does not give flexibility to provide smaller units in town centre locations where large family sized dwellings would not be appropriate. The policy does not give flexibility to provide smaller units where the provision of amenity space is challenging – amenity space is more important for family sized dwellings.
Lodge Lane N12 Resident's Association	HOU02	To clarify the objectively assessed need that 1 bedroom homes are the least desirable, and give the council the ammunition they need to refuse developments with excessive 1 bedroom units, this should be explicit in the policy wording of HOU02.
Lodge Lane N12 Resident's Association	HOU02	After the current b): "c) 1 bedroom homes are the lowest priority in market and affordable homes. Their inclusion, particularly in larger developments, should be in proportion to the identified need unless compelling justification can be supplied. If large developments do not deliver an appropriate mix of unit sizes reflecting the Borough's identified need then planning applications will be refused." Reindex the current c) and all references to it to d)

Representor	Section	Summary of Comments
Friern Barnet & Whetstone Residents' Association	HOU02	The policy sets out what is no more than a set of aspirations. It is unsound in that it does not adequately require compliance at the level of the individual development. Compare and contrast with, Policies TOW04 and CHW04, where it is made clear that applications which are non-compliant " will be refused" .
Home Builders Federation	HOU02	The policy is unsound because it conflicts with national policy. It is unclear how the Council intends this policy to operate. It states that its priorities are for three-bedroom homes, with two and four-bedroom homes being a medium priority. Is this a requirement? If so, it should make this clear in the policy. If this is to be a matter for negotiation, then the policy should be re-worded to make this clear. Local plan policies need to be clear and unambiguous (NPPF, para 16 d)). We would, however, advise against prescription to allow developers to respond flexibly to needs and local conditions. The policy states that the dwelling size priorities will be subject to periodic review and update. This is unsound. The Council cannot change the policy until it undertakes a review of the Local Plan (in five years time or earlier). It cannot impose new policy requirements on applicants outside of the local plan. These words should be deleted. The policy states: <i>Through the Authorities (SIC) 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.</i> The Council cannot require a different dwelling-mix on an application-by-application basis. It can lawfully require what is in its local plan policy, but it cannot make new policy 'on the hoof'. This should be deleted. The Council states that: <i>Innovative housing products that meet the requirements of this Policy will be supported.</i> We suggest this is deleted because it is unclear what would be judged 'innovative'.
Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	HOU02	We note that Publication Local Plan Policy HOU02 (Housing Mix) seeks to provide a mix of unit sizes and housing choices and provides Barnet's dwelling size priorities. We also note that proposed Policy HOU02 states that dwelling size priorities will be subject to periodic review and updates when new assessments of housing are commissioned. Hill and Trustees are supportive of the need to deliver a range of new housing types. To ensure flexibility, we consider that the following text should be added to proposed Policy HOU02 (the additions are shown underlined): <u><i>A flexible and end-user driven approach to housing mix should be taken when considering comprehensive redevelopment proposals.</i></u> Making this change would provide flexibility and it will ensure that the Publication Local Plan and Proposed Site Allocation can be effective in its delivery.
McCarthy and Stone Retirement Lifestyles and Churchill Retirement Living	HOU02	The policy stipulates development should provide a mix of dwelling types and sizes in order to meet the diverse housing needs of the Borough. The policy and its supporting text then go on to detail the current housing priorities in the Borough which are 'family sized housing' i.e. two, three and four bedroom homes. Para 5.5.6 in the supporting text for this policy recognises that older residents downsizing releases under-occupied family housing and stresses that well designed new homes in, or close to, town and local centres can encourage this. While we recognise that downsizers may not necessarily choose specialist older persons' housing, the enhanced level of services and communal facilities are more beneficial as frailty increases in later life. The cost of providing and maintaining these communal services and facilities is the principal reasons why specialist older persons' housing cannot provide a mix of house types in-block. The requirement to provide a mix of house types in block cannot apply to specialist older persons' housing accordingly and the wording of the policy and its supporting text should be amended to reflect this. To address the concerns detailed in our representation we would suggest the following amendments to Policy HOU 02 and its supporting text. Policy HOU02 Housing Mix <i>In applying the preferred housing mix the Council will consider the following criteria:</i> c) <i>Site size, surrounding context (including town centre location), PTAL and character.</i> d) <i>Mix of uses.</i> e) <i>Range of tenures.</i> f) <i>Potential for custom-build and community led schemes.</i> <i>Innovative housing products that meet the requirements of this Policy will be supported. The Borough recognises that providing a mix of housing types may not be feasible in specialist housing.</i>
Mill Hill Missionaries	HOU02	Policy HOU02 sets out that the 3 bedroom properties are the highest priority with 2 or 4 bedroom properties a medium priority. Firstly, we request for the Council to confirm whether this is a policy requirement or an ambition for the Borough. If a policy requirement, we consider many of the brownfield sites identified within the housing trajectory will struggle to meet this mix requirement, with many sites coming forward within the Opportunity and Growth areas likely focusing on smaller units. Larger units (i.e. 3 bedroom properties) are often suited more towards families and we consider are also often more appropriate for greenfield sites since they are able to provide gardens, car parking and open space. As such, we consider that the Council will struggle to meet this requirement on the sites identified within the Local Plan. We consider the Draft Local Plan is unsound because it is contrary to national policy, specifically Para 68 of the NPPF which states planning policies should identify a sufficient supply and mix of sites. We recommend that the Council consider a diverse range of sites (both greenfield and brownfield) to provide a range of housing mix and types across the Borough.

Representor	Section	Summary of Comments
Diocese of London	HOU02	In general, one and two bedroom dwellings are the most dominant type of accommodation delivered in Barnet, accounting for 78% of all new homes overall and 86% of flats. The Council has 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.
Barratt London	HOU02	Barratt London are still concerned that this policy does not go far enough to provide sufficient flexibility on housing mix for sites located in sustainable locations. The Council's approach to housing mix in Policy HOU02 requires private homes to be predominantly three bedroom and omits any provision of one-bedroom homes, even if they are delivered as part of a mixed development. This is not in conformity with paras 4.10.3 and 4.10.4 of the London Plan which considers one-bedroom units playing a very important role in meeting housing need. In determining a suitable mix, we urge the Council to also consider including additional criterion to point's c – f of policy HOU02 relating to "consideration of existing mix of homes surrounding a site" as well as the "viability of development" which are critical determining factors.
Hendon Goods Yard Village Ltd	HOU02	Criteria C-F Our client considers that Draft Policy HOU02 is sound – subject to including criteria under Paras C-F which recognise that in assessing housing mix, the Council will take account of context, PTAL, mix of uses and range of tenures. Innovative housing products will also be supported. This approach ensures that the right homes are delivered at the right place in the Borough, taking account of site-specific context, and is therefore considered to accord with the NPPF Para 68 ('Identifying land for homes').
Brent Cross South Limited Partnership ('BXS LP'),	HOU02	The London Plan 2021 provides that boroughs should take a positive approach to the BtR sector to enable it to better contribute to the delivery of new homes. Within that context, we welcome the reference within the Plan's housing policies to the importance of providing a broad range of tenures, including BtR, to ensure the delivery of a range of housing types. However, whilst the Plan expresses general support for BtR, application of the housing mix policies in Chapter 5 would pose significant viability challenges to actually delivering it. In particular, Policy HOU02 prioritises 3-bedroom units for market rent properties, and one-bedroom units are not supported in any tenure, with the supporting text implying that they are inflexible and will not be encouraged. If Brent Cross Growth Area is to meet the delivery timescales set out in the Plan, and in order to be a mixed and balanced community overall, it will need to include a range of residential types and products, especially BtR. The provision of smaller units in urban locations is an important part of the successful delivery of BtR development, where demand for one and two bedroom units is greater than in the owner-occupied or social/affordable rented sector and where potential yields and investment risk can be affected by increases in the number of large units within a scheme (as specifically highlighted in the Mayor's Affordable Housing and Viability SPG). Whilst the policy as worded does have some flexibility, we do not consider it goes far enough to provide the requisite policy support for BtR and that more clarity and detail is required. We suggest that the Plan is clear that policies on housing mix will be applied flexibly to BtR schemes in accessible locations like Opportunity Areas and/or Growth Areas (or, if considered necessary, specifically the Brent Cross Growth Area). This will enable a more permissive approach to BtR without jeopardising the ability of the Local Planning Authority to refuse 'traditional' housing schemes on the basis of an inappropriate housing mix. We have suggested specific amendments to the wording of the policy in the table below. The Plan provides limited detail on the affordable housing requirements for BtR development beyond reference to London Plan Policy H11 (Policy HOU06, part b). However, the supporting text within para 5.17.2 simply requires 'Discount Market Rent units delivered at a genuinely affordable rent level'. This in itself is not strictly in accordance with London Plan Policy H11 which requires Discount Market Rent ('DMR') to be provided, with at least 30% provided at London Living Rent levels and the remaining 70% at a range of affordable rents. London Plan Policy H11 includes a footnote in relation to what genuinely affordable rents mean: 'Boroughs may publish guidance setting out the proportion of DMR homes to be provided at different rental levels to benefit from the Fast Track Route. In setting local DMR requirements boroughs should have regard to the relationship between the level of discount required and the viability of achieving the relevant threshold level.' The Plan provides no such clarity on what is considered to be a genuinely affordable rent, and we request this is included so that the Plan provides certainty in respect of BtR development.
Brent Cross South Limited Partnership ('BXS LP'),	HOU02	As noted above, this policy does not provide the flexibility required to deliver BtR development, which requires a bespoke approach. It is important that Policy HOU02 makes it clear that the appropriate mix on individual sites will be considered on a case by case basis having regard to housing typology, local need and wider delivery patterns. We suggest the policy is amended as follows: <i>Barnet dwelling size priorities are:</i> <i>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. 1 bedroom (1 to 2 bedspaces) properties are a lower priority but may be appropriate where justified in relation to the criteria in parts c) to g) of this policy.</i> <i>In applying the preferred housing mix the Council will consider the following criteria:</i> <i>c) Site size, surrounding context (including town centre location), PTAL and character.</i>

Representor	Section	Summary of Comments												
		<p>d) <i>Mix of uses.</i> e) <i>Range of tenures.</i> f) <i>Any special characteristics applying to specific types of tenure (for example Build to Rent development).</i> g) <i>Potential for custom-build and community led schemes.</i> Innovative housing products that meet the requirements of this Policy will be supported.</p>												
Mactaggart and Mickel Homes	HOU02	<p>The COVID19 pandemic has prompted changes in our preferences to living. People are now spending longer at home due to amended working practices. For example, TUI are advising staff to spend just one day in the office per month going forwards. Similarly, companies such as PwC, Lloyds Banking Group, Virgin Media and Centrica are all openly moving towards a hybrid way of working. The direct implication of this is people are reconsidering where they live. Unsurprisingly, the desire for more space and the declining importance of an easy commute are key determinants. What this means in terms of housing mix is people are increasingly looking for an extra bedroom as a workspace environment and outdoor space. This is particularly relevant in the context of Para 5.5.10 of the Barnet Draft Local Plan (Reg 19) 2021 to 2036. This confirms that housing trends in Barnet are at variance with the wider London requirement insofar as it relates to housing mix. The Mayor’s Strategic Housing Market Assessment (SHMA) 2017 highlights that one bedroomed 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, which confirms a requirement for family housing. The largest market housing requirement in the London Borough of Barnet is for 3-bedroom homes and, thereafter, for 4-bedroom properties.</p> <p>Figure 2 – Required Market Housing in Barnet (extract from Local Plan)</p> <table border="1" data-bbox="472 584 1529 919"> <thead> <tr> <th data-bbox="472 584 1003 639">Unit Size</th> <th data-bbox="1003 584 1529 639">Market Housing</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 639 1003 695">1-bedroom</td> <td data-bbox="1003 639 1529 695">6%</td> </tr> <tr> <td data-bbox="472 695 1003 751">2-bedroom</td> <td data-bbox="1003 695 1529 751">24%</td> </tr> <tr> <td data-bbox="472 751 1003 807">3-bedroom</td> <td data-bbox="1003 751 1529 807">40%</td> </tr> <tr> <td data-bbox="472 807 1003 863">4-bedroom</td> <td data-bbox="1003 807 1529 863">25%</td> </tr> <tr> <td data-bbox="472 863 1003 919">5-bedroom</td> <td data-bbox="1003 863 1529 919">5%</td> </tr> </tbody> </table> <p>The Council has identified a number of strategic regeneration projects within its emerging Local Plan. This includes the Brent Cross Opportunity Area, which has been identified for the delivery of 7,500 homes and supporting employment over the plan period. The first phases of housing delivery have already been consented and construction has now commenced. These are providing approximately 33%, 1-bedroom flats / studio / 57%, 2-bedroom flats and 10% 3 / 4-bedroom flats (Ref. 17/6662/RMA). This housing mix does not align with that identified in the emerging Local Plan. In addition to the above, the Council are proposing 5,400 homes in town centre locations / 1,650 homes on new transport hubs / 1,400 homes in Cricklewood town centre and 3,350 along major road corridors. The emerging Local Plan policies also support the delivery of 8 to 14 storey buildings in these locations. As such, these growth areas are likely to have a strong emphasis towards high-density flat-led residential typologies. By contrast, the only area where sub-urban growth is identified is in Mill Hill East, which is projected to deliver 1,500 homes. This heavy dependence upon high-density apartment living does not align with the overarching vision of the emerging Local Plan (as set out in Para 3.1.1), which is to “be a place that is family friendly”; “a place where people choose to make their home”, and a place with a “range of housing types”. Para 6.2.2 sets a bold target of being “the most family friendly place in London” but it is unclear how this strategic objective will be delivered. As a note of caution and as confirmed in the emerging Local Plan, “New one bed homes that meet London Plan space standards contribute to address 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” (Para 5.5.7). This again emphasises the importance of balance, rather than placing an over-reliance on smaller properties. Authority Monitoring Report The Authority Monitoring Report (previously known as an Annual Monitoring Report) is published each year reporting on the performance of the council’s Planning policies. The most recent available on the Council website is for the period 2019 / 2020. The AMR is helpful insofar as it clearly sets out the long-term delivery mix that has been completed during 2011 / 2012 – 2019 / 2020. Again, this shows a strong bias towards smaller properties over the last decade.</p>	Unit Size	Market Housing	1-bedroom	6%	2-bedroom	24%	3-bedroom	40%	4-bedroom	25%	5-bedroom	5%
Unit Size	Market Housing													
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Representor	Section	Summary of Comments																		
		<p>Figure 3 – Housing Mix [2011 / 2012 – 2019 / 2020]</p> <table border="1"> <thead> <tr> <th></th> <th colspan="5">Number of Bedrooms</th> </tr> <tr> <th>Unit Type</th> <th>1 / studio</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> </tr> </thead> <tbody> <tr> <td>Total Number of Units</td> <td>40%</td> <td>26%</td> <td>16%</td> <td>9%</td> <td>9%</td> </tr> </tbody> </table>		Number of Bedrooms					Unit Type	1 / studio	2	3	4	5	Total Number of Units	40%	26%	16%	9%	9%
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Mill Hill Preservation Society	HOU02	MHPS supports policy HOU02 and the priority attached to the provision of 3-bedroom units.																		
Barnet Society Committee	HOU02	We share the concern of the Federation of Residents' Associations of the London Borough of Barnet (FORAB) that Barnet is becoming over-provided with one and two-bedroom units. We also believe that encouragement should be given to more varied – and newer – forms of tenure, e.g. co-housing. The policy needs a clearer requirement for a greater proportion of family homes, and encouragement of more diverse forms of tenure.																		
Hurricane Trading Estate	HOU02	We acknowledge the latest housing needs evidence to inform the housing mix of development proposals. However, whilst housing mix is informed by market demand for specific housing products, we are supportive of the flexible application set out in Policy HOU02 which recognises that site size, characteristics and location are relevant to devising appropriate housing mixes. Indeed, the local development context should be regarded as a key influence on housing mix, with different parts of the Borough demanding a range of approaches in order to deliver the right mix in the right locations. This aligns with the design-led approach to optimising site capacity. Higher density development should be focussed in Opportunity Areas and Growth Areas in order to make the best use of land and deliver the required level of growth.																		
Clarion Housing Group and the Huntingdon Foundation	HOU02	<p>Draft Local Plan Para 5.5.10 states: “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”. Table 6 of the Draft Local Plan demonstrates that there is a need for all units sizes, from one-bedroom to five-bedroom plus, for both market and affordable housing. Draft Policy HOU02 states the dwelling size priorities are as follows:</p> <p>“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.</p> <p>b) For Affordable Homes (see Policy HOU01 and supporting text):</p> <p>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</p> <p>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.</p> <p>iv. 2 bedroom properties are the highest priority for homes at an Affordable Rent / Low Cost Home Ownership”.</p> <p>While it is appreciated that developments are expected to have regard to the guide dwelling size priorities set out in Table 6 rigid application of these requirements may not be acceptable or appropriate in all cases. Draft Policy HOU02 goes on to state:</p> <p>“In applying the preferred housing mix the Council will consider the following criteria:</p> <p>c) Site size, surrounding context (including town centre location), PTAL and character.</p> <p>d) Mix of uses.</p> <p>e) Range of tenures.</p> <p>f) Potential for custom-build and community led schemes”.</p> <p>The wording of Draft Policy HOU02 is considered to be unsound in the context of NPPF (2021) Para 35 on the basis it is not justified or effective. The policy and associated supporting text fails to set out a clear definition of LB Barnet’s approach to assessing dwelling mix. Draft Policy HOU02 should be revised to provide clarity on LB Barnet’s approach to assessing dwelling mix and ensure that the guide dwelling mix can be applied flexibly to meet the Borough’s needs but also respond appropriately to site-specific conditions and the Criteria A1-9 of London Plan (2021) Policy H10. The wording needs to be clear that when considering the criteria deviations from the guide dwelling mix may be appropriate where fully justified to ensure soundness. The following sets out how we consider Draft Policy HOU02 should be modified to better secure an appropriate dwelling mix in schemes that contributes towards addressing the Borough’s housing need and also appropriately responds to site specific characteristics: <i>“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</i></p>																		

Representor	Section	Summary of Comments
		<p><i>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's guide dwelling size priorities are based on Barnet's SHMA and comprise:</i></p> <p><i>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.</i></p> <p><i>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</i></p> <p><i>ii. 2 and 3 bedroom properties are the highest priority for homes at Low Cost Rent.</i></p> <p><i>iii. 3 bedroom properties are the highest priority for homes at a London Living Rent.</i></p> <p><i>iv. 2 bedroom properties are the highest priority for homes at an Affordable Rent / Low Cost Home Ownership.</i></p> <p><i>These guide dwelling size priorities will be subject to periodic review and update when new assessments of housing need are commissioned.</i></p> <p><i>Through the Authorities Monitoring Report (AMR) the Council will set out progress on delivering these guide 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.</i></p> <p><i>The Council will allow variations to the guide dwelling size mix where it can be fully justified based on the following criteria:</i></p> <ol style="list-style-type: none"> <i>1. The nature and location of the site, including it's size, constraints site context (town centre or Growth Area location, PTAL and character);</i> <i>2. Viability;</i> <i>3. The mix of uses;</i> <i>4. The range of tenures;</i> <i>5. The aim to optimise housing potential on sites;</i> <i>6. Potential for custom-build and community led schemes;</i> <i>7. The ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock;</i> <i>8. The need for additional family housing and the role of one and two bed units in freeing up existing housing.</i> <p><i>In applying the preferred housing mix the Council will consider the following criteria:</i></p> <p><i>c) Site size, surrounding context (including town centre location), PTAL and character.</i></p> <p><i>d) Mix of uses.</i></p> <p><i>e) Range of tenures.</i></p> <p><i>f) Potential for custom-build and community led schemes.</i></p> <p><i>Innovative housing products that meet the requirements of this Policy will be supported”.</i></p> <p><i>An additional supporting para should also be included after draft para 5.5.11 and Table 7 to make it clear that the rigid application of preferred dwelling mix may not be appropriate. We would suggest the following or similar: “While developments are expected to reflect the preferred dwelling mix set out above, rigid application of these requirements may not be appropriate in all cases. When considering the mix of dwelling sizes appropriate to a development, the Council will have regard to individual site circumstances and variations to the guide dwelling size mix may be accepted where they can be fully justified”.</i></p>
New Barnet Community Association	HOU02	<p>While the policy recognises the need for family housing it is unenforceable and as such meaningless. Developers are reluctant to build three bedroom homes as they believe they are less profitable than studio and one bed flats and will typically only be included as part of the social housing requirement. The impact of this will force families to move out of Barnet due to the lack of supply of family homes. This also fails to recognise that due to the unaffordability of housing, children are living much longer in the parental home including adult children (over 18), and that in these circumstances they will be forced to share rooms even if they are of different genders. The Annual Monitoring Report identified that between 2011/12 and 2019/20 15,984 homes were completed of which 78% were studio, one and two bed homes. However, The Strategic Housing Market Assessment in November 2018, recognised that there was still a shortage of 3 bed properties and that these should be the top priority for open market housing. It states at 4.23 that “The percentage of overcrowded households in the private rented sector has also had the biggest increase from 25.1% to 35.7%”. As this was based on the last census in 2011 the situation is likely to have worsened when the 2021 census figures are disclosed. Unless the Local Plan clarifies and strengthens the policy on housing mix the problem of overcrowding will only get much worse. The policy should include specific requirements for developments of more than 150 homes to provide the mix of homes detailed in the policy and supported by the Strategic Housing Market Assessment and that these requirements cannot be offset with financial payments. The policy must be explicit that failure to provide the mix of homes will result in an automatic planning refusal.</p>
Theresa Villiers MP	HOU02	<p>I share the concerns of FORAB and the Barnet Society about the over-provision of one and two bedroom units when it has been identified that three bedroom homes are needed in the borough. The policy should be reviewed to ensure that encouragement is given to developers to provide three bedroom homes, preferably with gardens. Housing is a major issue for my constituents.</p>

Representor	Section	Summary of Comments
Joe Henry	HOU03	<p>The conversion and redevelopment policy is wholly unreasonable. This policy conflicts with the policies in the NPPF and the London Plan 2021, because it would be a barrier to the efficient use of land and providing higher density development, in the majority of the borough. The policy mainly seeks to protect the character and amenity of local areas, but character and amenity are protected by other policies. Therefore, to introduce a raft of criteria which does not allow common sense or meaningful assessment to be carried out should be rejected.</p> <p>The first criteria of only allowing redevelopment and conversions of houses within 400 metres walking distance of a major or district town centre (in accordance with Policy TOW01) or is located in an area with a PTAL of 5 or more, would mean that over 90% (estimated) of the borough could not be converted or redevelopment. This would have huge consequences for housing delivery, in particular meeting Government and London Plan policies to deliver housing. Why is this a requirement when many successful conversions and redevelopment sites are outside 400 metres of local shops and public transport. The requirement to provide a 3-bedroom unit at ground floor level in a conversion is often not practical. There is no justification to only allow a family sized dwelling in a conversion at ground floor level. So long as the provision of a 3-bedroom unit on upper floors includes access to sufficient amenity space then this should be supported. Criteria d) would prohibit the conversion of large houses, including those close to town centres. Most large houses are an inefficient use of floorspace and are only affordable to the very affluent (in Barnet). Large houses in the right locations should be seen as an opportunity to convert or redevelop in order provide much needed dwellings. Large houses can only be afforded by the very rich so protecting these types of houses would restrict the majority of people having access to decent housing – the policy as it is currently worded is discriminatory against all those except the very affluent. A definition of larger homes should be provided to ensure only efficient 3–5-bedroom houses are protected and not oversized inefficient houses which could provide much needed housing if converted or redeveloped.</p>
Friern Barnet & Whetstone Residents' Association	HOU03	Amend as shown- "These dwelling size priorities will be subject to periodic review and update when new assessments of housing need are commissioned. <u>Residential development proposals that do not comply with the housing mix set out in Table 6 (as from time to time updated) will be refused.</u>
Barnet Cycling Campaign	HOU03	When converting existing dwellings to increase occupancy, consideration should be given to provision of adequate and affordable cycle storage both on site and with on-street cycle hangars.
McCarthy and Stone Retirement Lifestyles and Churchill Retirement Living	HOU03	<p>The policy looks to manage the housing stock in the Borough by placing a presumption against the conversion of existing dwellings into flats or Houses in Multiple Occupations (HMO), or their demolition and redevelopment unless specific criteria can be met. This policy is of interest to the respondents who do acquire and redevelop residential land, either individual plots or land assemblies, in order to bring forward specialist older persons' housing. Of the criteria for the conversion and redevelopment of residential properties, the majority are concerned with ensuring that new dwellings meet the required design or parking standards. Sub-clause a) however limits redevelopment to locations within 400metres or 0.25 miles of a town or local centre, or, it is located in an area with a PTAL of 5 or more. The respondents appreciate the benefits of being near town centres and understand how this facilitates the continued independence of older people and typically acquire sites within 0.5 miles (800 metres) of town and local centres. Both Companies have brought forward successful specialist older persons' housing developments within 0.5 miles of town and local centres and duly consider limiting the redevelopment of larger residential properties to within 0.25miles of such centres to be overly restrictive. Sub-clause will limit opportunities for redevelopment in locations which can be reasonably considered to be sustainable. Indeed, by restricting redevelopment to such a limited area within the Borough the policy is contrary to the principles of Chapter 11. Making Effective Use of Land in the NPPF which states that Plans and decisions should 'promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used' (Para 120 d). This aspect of the policy is unsound accordingly. To address the concerns detailed in our representation we would suggest the following amendments to Policy HOU 03. <i>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.</i></p>
Mill Hill Preservation Society	HOU03	We also support Policy HOU03 'Residential Conversions and Re-development of Larger Homes' that seeks to protect the character and amenity of local areas and seeks to protect larger existing homes subject to conversion.
Barnet Society Committee	HOU03	We share the concerns of the Federation of Residents' Associations of the London Borough of Barnet (FORAB) that this policy, as currently worded, will not be effective in resisting the trend towards smaller family homes. Make definitions of larger homes more rigorous.
TFL (Spatial Planning)	HOU03	We are concerned that the amended wording suggests that the Council will only support the conversion of larger homes which provide 'Minimum car and cycle parking provision in accordance with policy TRC03'. This is inaccurate because car parking requirements in policy TRC03 are expressed as maximum not minimum provision. Given that suitable sites should be within 400 metres walking distance of a town centre or in an area with a PTAL of 5 or more,

Representor	Section	Summary of Comments
		residential conversions should be car free with provision only for disabled persons car parking (although cycle parking should meet minimum standards). It would be simpler to state that conversions should be 'car free and permit free while cycle parking should be provided in accordance with minimum parking standards.'
Theresa Villiers MP	HOU03	Residential Conversions and replacement of larger homes. FORAB points out that, as this policy is currently worded, it is not effective in resisting the trend towards smaller units. The council has always resisted conversion of houses into flats and this should continue in the emerging plan. The identified housing need in the borough is for three bedroom family homes (preferably houses with gardens) and I am concerned that the emerging plan, as currently drafted, does not secure that aim. It is therefore not a legally sound way to deliver long established council policy. Re-word this policy so that the importance of delivering three bedroom homes is clear.
Joe Henry	HOU04	Criteria 1 (D) is unreasonable (be within 400m walking distance of local shops and easily accessible by public transport) – why is this a requirement when many successful homes are outside 400 metres of local shops and public transport. Many homes provide care for people who cannot travel so the criteria would be pointless for these types of homes. There is no justification for the criteria. Part (b) of the HMO policy – This needs an explanation in the preamble what evidence the Council would expect to demonstrate an identified need. What does “a harmful concentration of such a use in the local area” mean – this is too subjective. Part (d) of the HMO part of the policy requires HMO’s to; “Be easily accessible by public transport, cycling and walking.” This needs to be defined. Para 5.14.2 – The council need to define what they mean by “non self-contained market housing” – does this mean kitchen facilities can be provided in each room so long as there are significant communal areas?
Home Builders Federation	HOU04	<p>1: Housing Choice for People with social care and health support needs Part of the policy is unsound in relation to the supply of housing for older people because it is contrary to national and London Plan policy.</p> <p>We support the reference in 1 (b) of the policy to the aim to deliver more housing for older people in line with the London Plan indicative benchmark. The London Plan requires Barnet to provide 275 units of older persons housing, as set out in Table 4.3 of the London Plan. We are pleased to see this reflected in the Barnet local plan. The Council is facing an increase in the number of older people living in the borough, as para 8.13.1 acknowledges. Part A of London Plan policy H13 states: <i>Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of:</i></p> <ol style="list-style-type: none"> 1) <i>local housing needs information including data on the local type and tenure of demand, and the indicative benchmarks set out in Table 4.3</i> 2) <i>the need for sites 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</i> 3) <i>the increasing need for accommodation suitable for people with dementia.</i> <p>The London Plan observes that the number of older people in the city-region will increase substantially. As para 4.13.2 observes: <i>By 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent. Appropriate accommodation is needed to meet the needs of older Londoners.</i></p> <p>However, it is unclear from the Barnet Local Plan whether the Council will support the supply of the full range of types of older persons housing that is needed and encouraged by the London Plan. From the discussion in the section titled <i>Housing choice for vulnerable people</i> (page 97), it appears that the Council only supports: Extra care housing. Sheltered plus housing. Residential care homes This is set out in para 5.10.2. The types of accommodation specified, while important, does not cover all the types of older persons housing that London Plan policy H13 has been devised to support. The type of older persons accommodation that the Barnet Plan supports, would fall without the ambit of the London Plan policy. Para 4.13.4 of the London Plan states the following: <i>This policy contains requirements for ‘specialist older person housing’. It does not apply to accommodation that has the following attributes, which is considered ‘care home accommodation’:</i></p> <ul style="list-style-type: none"> • <i>personal care and accommodation are provided together as a package with no clear separation between the two</i> • <i>the person using the service cannot choose to receive personal care from another provider</i> • <i>people using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold</i> • <i>likely CQC-regulated activity⁷² will be ‘accommodation for persons who require nursing or personal care’</i> <p>Para 4.13.5 then goes on to state: <i>Specialist older persons housing that does not provide an element of care but is specifically designed and managed for older people (minimum age of 55 years) is covered by the requirements of this policy.</i></p> <p>Para 4.13.6 of the London Plan then goes on to clarify: <i>In addition to this, the requirements of this policy also cover specialist older persons housing that has the following attributes:</i></p>

Representor	Section	Summary of Comments
		<p><i>i. where care is provided or available; a. there are separate contracts/agreements in place for the personal care and accommodation elements, and/or b. residents have a choice as to who provides their personal care</i></p> <p><i>ii. housing is occupied under a long lease or freehold, or a tenancy agreement, licensing agreement, license to occupy premises or a leasehold agreement</i></p> <p><i>iii. housing provided is specifically designed and managed for older people (minimum age of 55 years)</i></p> <p><i>iv. likely CQC-regulated activity⁷³ will be 'personal care'</i></p> <p>It would appear that the Council has misunderstood the intention behind London Plan policy H13, which is to increase the supply of a wider type of older persons housing, including retirement housing, not just accommodation providing an element of care. Indeed, London Plan policy H13 is clear, that 'extra-care' and 'residential-care' housing, that typically falls under use class C2, is not the type of housing that the policy is aiming to support. The Barnet Local Plan should be revised to reflect the intention of the London Plan. Part 1 b) of Policy HOU04: Specialist Housing is misleading, implying that the tenure breakdown provided in Table 8 of the Local Plan is relevant to the supply of the indicative benchmark of 275 older persons homes a year, even though this target relates primarily to the supply of older persons housing in the C3 category. The Local plan policy should be amended to read: <i>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; This would include the full range of tenures referenced in paras 4.13.5 and 4.13.6 of the London Plan.</i> The London Plan requires local authorities to plan proactively to meet the indicative benchmarks – see London Plan para 4.13.9. To help improve the likelihood that the indicative benchmark target of 275 units of older persons housing is provided each year, the policy should be amended to read: <i>'In the event that the annual benchmark is not achieved in a year, the Council will operate a presumption in favour of proposals for older persons housing in the subsequent year. This presumption will continue to operate until the benchmark has been achieved.'</i></p>
Barnet Cycling Campaign	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.
McCarthy and Stone Retirement Lifestyles and Churchill Retirement Living	HOU04	<p>McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in sheltered housing for older people. Together, we are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Para 1 of the PPG Housing for Older and Disabled people states: "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking". Para: 001 Reference ID: 63-001-20190626 The Local Plan acknowledges that the demographic profile of Barnet is set to increase over the Plan period and references Table 4.3 of the London Plan which requires the Borough 275 units of specialist older persons' accommodation per annum. Para 5.10.6 and Table 8 – Additional Modelled demand for Older Persons Housing up to 2036 further break down the London Plan target into types of accommodation and tenure. The greatest need in Table 8 is for Leasehold Schemes for the Elderly (LSE). The terminology employed in Table 8 is taken from the SHMA which utilises the methodology employed to assess need by the Housing the Housing LIN Older People Resource Pack 2012) However the SHMA uses different terminology in part to Housing Lin and this is misleading.</p> <p>A) The Plan refers to "Traditional Sheltered" whereas Housing LIN refers to "Conventional sheltered housing to rent"</p> <p>B) The plan refers to "leasehold Schemes for the elderly" whereas Housing LIN refers to "Leasehold sheltered housing"</p> <p>Whilst the respondents would suggest that use of the word "sheltered" is somewhat out of date and retirement housing is preferred, the Housing LIN terminology should be employed. It is "leasehold Schemes for the elderly/Leasehold sheltered housing" together with enhanced sheltered that is considered by the respondents to be housing without the provision of significant on-site care facilities and accounts for a substantial proportion of the older persons' housing requirement (at least 52%). The focus of Policy HOU 04 and its supporting text is however the delivery of supported accommodation, or housing with care. 'Traditional sheltered', and potentially Leasehold Schemes for the Elderly, is considered by the respondents to be housing without the provision of on-site care facilities and accounts for a substantial proportion of the older persons' housing requirement (at least 23%). The focus of Policy HOU 04 and its supporting text is however the delivery of supported accommodation, or housing with care. We commend the manner in which the housing needs of older people have been comprehensively addressed in the Policy HOU 04, however the intention of London Plan Policy H13 is increase the supply of a wider type of older persons housing, including 'sheltered' housing, and not just housing with care typologies. We are therefore suggesting amendments to the recommendations in Policy HOU 04 so that it encourages the delivery of all forms of specialist older persons' housing. We also note that subclause 1a) requires older persons' housing to demonstrate an identified need to help people live independently. This need is however self-evident and has already been established as significant in both the London Plan and the Barnet SHLAA. We also note the requirement in subclause 1 d) for specialist older persons' care facilities to be located within 400metres (0.25 miles) of a town or local centre. The respondents appreciate the benefits of being near town centres and</p>

Representor	Section	Summary of Comments
		<p>understand how this facilitates the continued independence of older people and typically acquire sites within 0.5 miles (800 metres) of town and local centres. Both Companies have brought forward successful specialist older persons' housing developments within 0.5 miles of town and local centres and duly consider the requirement be within 0.25miles be both onerous and unjustified. We would also, respectfully, highlight, that despite the largely positive manner which Policy HOU 04 addresses the Housing Needs of the elderly, it is undermined by the lack of consideration given to older persons' housing typologies in Policy HOU 01: Affordable Housing and the Barnet Local Plan Viability Study Report. This matter is addressed comprehensively in our representation to Policy HOU 01 and in our supporting viability appraisal. To address the concerns detailed in our representation we would suggest the following amendments to Policy HOU 04.</p> <p><i>1: Housing Choice for <u>Older People and people with social care and health support needs</u></i> <i>Proposals for <u>specialist older persons' housing and people with social care and health support needs</u> should:</i></p> <p>(a) <i>In meeting an identified need help people to live independently;</i> (b) <i>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;</i> (c) <i>Demonstrate that they will not have a harmful impact on the character and amenities of the surrounding area;</i> (d) <i>Be within 400m walking distance of local shops and easily accessible by public transport with the exception of specialist residential care facilities;</i> (e) <i>Provide adequate communal facilities including accommodation for essential staff on site;</i> (f) <i>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</i> (g) <i>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</i></p>
Mill Hill Missionaries	HOU04	<p>Table 4.3 of the London Plan establishes annual Borough benchmarks for specialist older persons housing for the period 2017-2029. For Barnet, this equates to 275 units per annum. Policy HOU4 (Point 1) sets out a broad response for catering for the wider specialist housing needs, including those with social care and health support needs, with Point B making specific reference to the London Plan benchmark of 275 homes per annum. However, it is considered that there should be a standalone policy to reflect the local, regional and national importance attributed to the delivery of specialist senior living housing. In terms of the type of specialist housing for older people, the Council set out at Para 5.10.2 of the Draft Local Plan that housing proposals should consider Extra Care Housing, Sheltered plus housing and Residential Care Homes. This does not cover all types of older persons accommodation and does not reflect Policy H13 of the London Plan which sets out the importance of providing all forms of specialist housing, including those falling outside the classic C2 use Class (i.e. retirement housing, not just accommodation providing an element of care). We also consider that Policy HOU4 should set out more specific requirements for the location of this specialist housing and provide further clarity on how this target will be met. We consider the Draft Local Plan is unsound because it is contrary to national policy, specifically Para 62 of the NPPF which requires planning policies to reflect housing for older people. 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. We also recommend that the Council provide further clarity on the types of specialist housing for older people, the appropriate locations for this form of development and how the figure will be met within the Plan period.</p>
Joe Henry	HOU05	<p>The policy is contradicted by the council's policy to stop conversions and redevelopment in most of the borough. Part of the policy states: "3. <i>The Council will protect housing from permanent conversion to short-stay accommodation.</i>" Providing short term temporary accommodation for vulnerable groups for example is very important. This part of the policy seeks to try and stop such provision of much needed short term temporary accommodation. If the policy seeks to prohibit the conversion of permanent residential accommodation into temporary accommodation, then the Council need a policy outlining where they would support the provision of temporary accommodation – it is a concern that the Local Plan seems to be trying to exclude the provision of short-term accommodation. Part 2 of the Policy states: "2. <i>The Council will utilise its regulatory powers to reduce the number of vacant dwellings and bring them back into use.</i>" – this is not a policy but a statement of intent which is not related to planning.</p>
Joe Henry	HOU06	<p>Are build to rent schemes exempt from providing a mix of dwellings?</p>
Mill Hill Missionaries	HOU06	<p>Policy HOU06, Part C, of the Draft Local Plan states that neighbourhood plans will be encouraged to identify opportunities for Self-Build and Custom Housebuilding. In line with the continued Government drive to support the self and custom build sector, the latest NPPF, at para 59, duly recognises that it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed. Para 61 stipulates that "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including...those people wishing to commission or build their own homes" (our emphasis). Although the self-build demand in Barnet may</p>

Representor	Section	Summary of Comments
		<p>be lower than other Boroughs, there is a requirement to ensure that enough permissions are granted to meet the level of need. The Draft Local Plan is unsound because it is contrary to national policy. The policy approach suggested in HOU06 that self and custom-build is delivered through a Neighbourhood Plan is not considered to be a sound approach and simply delays the identification of sufficient sites to meet this need. 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.</p>
John Cox	HOU07	<p>This response email is to claim that the local plan's policy on gypsies, travellers and travelling showpeople is unsound and requires rejection by the Planning Inspectorate. The borough needs to start again, as an essential Major Modification to the local plan. GOVERNMENT GUIDANCE The local plan has been produced under the terms of the government's 2015 guidance: Planning policy for traveller sites which states that: "The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers, while respecting the interests of the settled community. To help achieve this, Government's aims in respect of traveller sites are: a. that local planning authorities should make their own assessment of need for the purposes of planning. [Unfortunately, Barnet has not made a reasonable assessment of need, based on credible evidence, but then, historically, Barnet officers have historically based 'traveller policy' (and their careers) on political direction in the borough and, perhaps historically, their own prejudices.]b. to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites. [Barnet has jointly worked with other authorities in the West London Alliance, but that has had unreasonable consequences for policy.]...</p> <p>g. for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies. [Barnet's policy may be politically realistic to some, but it is not fair or inclusive.]h. to increase the number of traveller sites in appropriate locations with planning permission, to address under-provision and maintain an appropriate level of supply.[Barnet maintains that there is no under-provision, because there is no demand.]...</p> <p>j. to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure.[An expense this 'borough of enterprise and success' has historically sought to avoid.]"There seem to be no changes in the NPPF since 2015 that significantly affect any of the above statutory guidance. LOCAL PLAN SOUNDNESS As the local plan says (in 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: ... Sites for Gypsies, Travellers and Travelling Showpeople in order to meet any need identified by Barnet's Gypsy and Traveller Need Accommodation Assessment (GTNAA)." Section 5.9 then covers Gypsies, Travellers and Travelling Showpeople It says (in 5.9.1): "The West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) provides a robust and objective assessment of current and future need for accommodation."It does not do that at all. It is not 'robust' or 'objective', and it therefore makes any policy derived from this 'evidence' unsound. It is not positively prepared, because it does not provide a strategy which, as a minimum, seeks to meet the area's objectively-assessed needs. No significant objectivity has been used by the authority in its assessment.</p> <p>It is not justified, because there is no appropriate strategy, considering the reasonable alternative of providing travellers pitches as do every surrounding local authority, (not even ONE PITCH!) or encouraging private provision. It is not effective - except in the sense that it would effectively manage to deliver nothing at all over the plan period. Mention of 'London-wide planning' is kicking-the-can-down-the-road, since it is unlikely the Mayor would have statutory powers to effect actual change in Barnet. Although there has been a 'West London Alliance' report, the result is that there is no effective joint working on cross-boundary strategic matters, or only in the sense that other boroughs will continue to make provision for travellers, but in Barnet, "it will only happen over our dead body". It is not consistent with national policy in the sense it ignores the 2015 statutory guidance that: "In assembling the evidence base necessary to support their planning approach, local planning authorities should:a) pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups) b) cooperate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities c) use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions."</p> <p>LAST-MINUTE ADDITION! The Draft Local Plan (Reg 19) Publication consultation has been from: 28 June 2021 until: 9 August 2021. However! On 20 July 2021 the authority added (i.e. quietly slipped out) a document into the local plan submission's web page:Update on Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) This document appeared, without any known publicity, over half-way through the public consultation period. The Planning Inspectorate can, of course expect to receive many additional documents from a planning authority during the progression of a local plan, which need to be adequately classified and published.</p>

Representor	Section	Summary of Comments
		<p>However, the Planning Inspectorate may want to clarify if the public is expected to comment on a moving target, that is, one that quietly changes during the public consultation period. THE GTAA The GTAA report states (in section 3.2): "PPTS (2015) contains a number of requirements for local authorities which must be addressed in any methodology. This includes: - the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); - identification of permanent and transit site accommodation needs separately;</p> <p>- working collaboratively with neighbouring local planning authorities; and - establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople. The stages below provide a summary of the methodology that was used to complete this study. ..." I invite the Planning Inspectorate to conclude that, in the case of LB Barnet, the GTAA jointly-written supporting document is unsound. Its methodology may be partly questionable in the case of the other contributing London boroughs, but at least they have existing traveller pitches to allow interviews by researchers. Barnet has no existing traveller pitches and must have been delighted by the chosen methodology, endorsed by the borough, of interviewing non-existent people! (I have already challenged the use of joint supporting documents for local plans with the Planning Inspectorate, and specifically regarding this GTAA and its effect in Barnet in particular. I have so far received what I think are unsatisfactory replies. There is, therefore, currently no opportunity for reasonable democratic comment by the public on multi-authority methodology. The London Borough of Brent has already used the GTAA at its local plan submission, and I got short shrift when I raised generalised questions about the report at the EiP there. There is no guidance from the Planning Inspectorate to inspectors on this subject, and that ought to be rectified.) Barnet is hardly the size of a parish council, and does not need to hide behind 2015 guidance that says: "... consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)." Other boroughs are quite capable of individual borough policies and of making traveller provision. Barnet is big enough to do so too, whether privately-provided with Barnet's planning support or publicly-provided, mentioned as 'necessary' in government guidance (and which is widespread and the norm across London boroughs). The GTAA manages to say about Barnet (in section 7.20 onwards): "There were no Gypsies, Travellers or Travelling Showpeople identified to interview in Barnet." "Following efforts that were made, it was not possible to interview any households living in bricks and mortar in Barnet." "There are no public sites in Barnet so there is no waiting list." "There were no households identified to interview in Barnet, so there is no current or future need for additional pitches for households that met the PPTS planning definition." "There were no Travelling Showpeople identified in Barnet, so there is no current or future need for additional plots under the PPTS or Draft London Plan definition of a Traveller." Money well-spent by the borough then! It is perfectly fair to say that some of those phrases were used for other boroughs in the report, but only Barnet manages to get 'all the ducks in a row'. It is appropriate to ask the Planning Inspectorate to consider what an imaginary similar report might look like if it was: - only commissioned by Barnet, and - only applied to Barnet. It might say:</p> <p>"We wrote an appropriately-resourced report methodology - that was endorsed by the borough - to successfully collect absolutely no evidence, and we have succeeded in achieving that aim. As anticipated, it provides you with cover for the decades-old political policies towards travellers in Barnet to continue. Job done. Please pay our fee." The GTAA regarding Barnet is unsound. Policies based on it are therefore also unsound.</p> <p>The 'GTAA UPDATE' OF 20 JULY The authority has unexpectedly produced a second supporting document, as an 'update'. It states (in section 2.1.1): "Through the Local Plan consultation, respondents have highlighted reports of unauthorised encampments in Barnet throughout 2019. Respondents also claim that the evidence base and policy have been unsoundly produced. • One respondent highlighted that evidence base and policy have been unsoundly produced and will be challenged if the Council do not act more responsibly and equitably as a London borough with shared responsibilities for the city. The respondent claimed that: 'there have been decades of well-documented discrimination and racism against these groups from the political leadership of Barnet'. The respondent [further] claimed that the Council 'are simply perpetuating that, and 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.'</p> <p>• Another resident questioned the derivation and accuracy of the statement in the GTAA that there were no Gypsies, Travellers or Travelling Showpeople identified to interview in Barnet. The representor states:</p> <p>- she visited a site of five caravans, parked in the car park of Bethune Park in N11 on December 6th, 2019, and</p> <p>- provided data from the NextDoor 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</p> <p>- suggest[s] that [all] this information would also be available to the Safer Neighbourhood Team, the Courts, local Councillors and the local MP who was also lobbied for their removal. The 'GTAA Update' goes on to document numerous additional non-approved encampments. I have received details from the Metropolitan police and from the local authority under Freedom of Information requests of some of those occasions.</p>

Representor	Section	Summary of Comments
		<p>Co-incidentally, the 'GTAA Update' document was published after I requested those FoI details from the authority. The Planning Inspectorate should examine whether the authority considers - whether or not evidence of non-approved encampments (not 'unlawful encampments') - provides evidence, worthy of the local plan, of unmet demand in the borough. The local plan actually states (in section 5.19.1): "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." So: does it or doesn't it? The alternative, which I hope the Inspectorate will consider unsound, is in proposed Policy HOU07: "The Council can demonstrate that there is no objectively-assessed need for pitches and plots for Gypsies and Travellers and Travelling Showpeople households." The public can reasonably conclude that the planning authority CANNOT demonstrate that. The rest of Policy HOU07 gives quite reasonable policies for "any proposals that do come forward" [perhaps meaning: "despite us moving heaven and earth to stop that from ever happening"]. Furthermore, the authority needs to remind the Planning Inspectorate of the specific 2015 guidance regarding the authority itself providing the required provision: "... Government's aims in respect of traveller sites are ... to promote more private traveller site provision, while recognising that there will always be those travellers who cannot provide their own sites" A rejection of Policy HOU07 is a necessary step towards that national aim of public provision as policy in Barnet, as in all other personally-known local authorities, even if the political leadership of the Barnet will 'possibly' direct its officers to try and stop a single penny being spent or any actual proposal being drawn up. The 'GTAA Update' is a strange document, presumably produced as a last-minute defence (by "Stone, Caroline") because it is hardly an extra brick in any wall for protecting the authority's unbending, long-term attitude to travellers. The attempt to talk up future, unspecified London-wide policies is a trap that I hope the Planning Inspectorate does not fall into. More to the point, the authority's central policy description claim that: "The West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) provides a robust and objective assessment of current and future need for accommodation." patently does not.</p>
Marstead Living Limited/IBSA	HOU1	<p>This policy, as drafted, is considered unsound on the basis it is not effective or in conformity with national policy with respect to how it applies to Specialist Older Persons Housing (SOPH) and with respect to First Homes.</p> <p>Specialist Older Persons Housing (SOPH) The policy as currently drafted does not clarify whether and how this policy applies to Specialist Older Persons Housing (SOPH) (see also comments on behalf of Marstead Living Limited/IBSA on Policy HOU04). It should be consistent with the London Plan, which clarifies that affordable housing policies do apply to SOPH. However, SOPH is different to general needs housing in terms of its design, specification, management, occupants, and sales values which has an impact on viability and its ability to be provided as a genuinely affordable product. It is critical that affordable housing policies take account of this to ensure their effectiveness. This requires a more flexible approach to be allowed for SOPH schemes when compared to conventional housing. Viability - The new Local Plan should take into account the NPPF (NPPF) and the associated PPG. Para 015 (Reference ID: 63-015-20190626) of the PPG provides helpful guidance for the preparation of Local Plans and states: "Viability guidance sets out how plan makers and decision takers should take account of viability, including for specialist housing for older people. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure. Plans can set out different policy requirements for different types of development." It is critical that planning policies take account of the distinct viability characteristics of SOPH to enable a 'level playing field' to be established that allows SOPH providers to compete for sites with general housebuilders. Otherwise, SOPH will simply not be delivered, preventing needs being satisfied and benefits realised. In practice this requires affordable housing policies to be applied differently (more flexibly) to SOPH when compared to conventional housing in order to be effective. In order to be consistent with the London Plan, HOU04 should confirm that both the Fast Track and Viability Tested Routes are available for SOPH proposals, but that the standard tenure split requirements may differ to those set out in London Plan Policy H6. Form of Affordable Housing Provision - SOPH schemes typically comprise a unified scheme managed as a single entity, with extensive on-site services (including care) funded via service charges. Providing genuinely affordable SOPH housing within such schemes can be particularly challenging on account of high service charges which can make such homes unaffordable to eligible households. In this context, affordable housing needs can often be more effectively met in the form of conventional housing off-site (or via payment of a commuted sum in lieu).</p> <p>First Homes - The expected affordable tenure split set out in the draft policy is not consistent with national planning policy (as introduced by Ministerial Statement dated 24/05/21) regarding First Homes..(See also comments on behalf of Marstead Living Limited/IBSA on Policies HOU02 and HOU04). The policy should be amended, in line with the London Plan, to reference the separate and distinct requirements for affordable housing associated with SOPH. It should acknowledge that the Council will seek affordable housing from SOPH developments of 10 or more dwellings and the policy (or a corresponding specific policy for SOPH) should set the criteria for eligibility to the Fast Track Route applications – namely providing a minimum 35% SOPH affordable housing on-site but with flexibility of tenure allowing up to 100% intermediate tenure. Alternatively, the Viability Tested Route can be followed whereby the maximum viable % of affordable housing should be provided either by:</p> <p>(a) The on-site provision of affordable SOPH or conventional homes (which can differ from the target affordable housing tenure splits including up to 100% intermediate tenures);</p>

Representor	Section	Summary of Comments
		<p>(b) The off-site provision of affordable SOPH or conventional homes (where it can be demonstrated that (a) is unfeasible and/or this would give rise to demonstrable benefits); or</p> <p>(c) Providing a financial contribution in-lieu (where it can be demonstrated that (a) and (b) are unfeasible and/or this would give rise to demonstrable benefits. The policy and its supporting text should 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. Finally, the policy should be amended to account for First Homes</p>
Marstead Living Limited/IBSA	HOU2	<p>This policy, as drafted, is considered unsound on the basis it is not effective, positively prepared or justified. As currently drafted, the dwelling size priorities apply to all homes which would include Specialist Older Persons Housing (SOPH). NPPF para 62 requires the size of housing needed for different groups (including older people) to be assessed and reflected in planning policies. The housing needs (in terms of unit sizes) of older persons is different to those of younger households due to the differences in typical household sizes which are much smaller. Office for National Statistics data confirms that 81% of persons in the UK over the age of 70 live alone and in practice the remainder are most commonly 2 person households. Accordingly, meeting the housing needs of this group mainly requires the provision of homes with one or two bedrooms (not 2-4 bedrooms as prioritised by the policy as currently drafted). Accordingly, the policy as currently drafted (insofar as it applies to SOPH) would not be effective or consistent with national policy. It is also noted that the AMR does not provide monitoring information specifically relating to SOPH (it is included as part of conventional housing figures). Therefore using the AMR as a mechanism to monitor the delivery of this policy with respect to SOPH would be ineffective. (See also comments on behalf of Marstead Living Limited/IBSA on Policies HOU01 and HOU04) The policy should be amended, in line with the London Plan, to reference the distinct requirements for SOPH.</p> <p>It should 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. As such it should highlight that SOPH proposals will be expected to provide a mix of dwelling types and sizes that demonstrably address identified local needs for older persons. The AMR must also include detailed breakdowns of the number of consented and delivered SOPH units so that the effectiveness of the Local Plan in delivering the high targets set out in the Local Plan (and LBB's own evidence base) can be assessed accordingly.</p>
FORAB	HOU2	<p>The reality of recent years is that one and two bedroom flats have dominated the supply of new homes, as indicated in para 5.5.5. Many schemes currently in the pipeline are continuing to offer a preponderance of small flats. Hardly any houses are being built. The failure to provide larger family units, and indeed to stop the continuing loss of existing ones (see HOU03) is a major policy failure that threatens the status of the Borough as a highly desirable place for families to live. Middle and upper income families who aspire to family houses may find such housing in the Borough increasingly less affordable, and as the character of areas change they may find them less congenial places to live. It is these residents who provide the glue in the Borough supporting civic and voluntary activities, and weakening their numbers will weaken the social fabric of the Borough. This policy does indeed express the aspiration to provide more larger family homes 9, but lacks any measures to make this happen. This policy needs much more muscle. It should be a requirement that sizable developments should offer larger family homes (minimum of three bedrooms suitable for 5 persons or more) and if they fail to do so then planning consent will be refused. Stronger controls on height (see comments on CHD04) could shift the balance between the commercial appeal of building flats and instead make the provision of houses more attractive.</p>
FORAB	HOU3	<p>Text at 5.6 identifies the concern at the loss of larger family sized homes to conversion or demolition to make way for small flats. The plan asserts that a two bedroom flat can be regarded as a family home for four persons, and as many of these are being built, the evident concern is about family homes suitable for five persons or more. The existing policy DM01 has had some success in resisting these conversions but lacks precision and interpretation has been inconsistent. To reflect the concerns something stronger and more precise is needed. HOU03 attempts to do this and we do recognise the value of the constraints introduced by clauses (a)(d) (e) (f) and (g). But clause (b) will not only fail in its objective, it could make it easier for developers to secure approval for conversions by proposing that a gross internal area of 74sqm is an adequate minimum. Table 9 identifies that 74sqm is only suitable for a four person home, irrespective of whether two or three bedrooms. And as the availability of four person homes is not a problem specifying 74sqm is incorrect. Para 5.6.4 says these conversions should have access to a rear garden. But table 11 specifies that for a five person flat the minimum outdoor space should be 7m2, which cannot be regarded as a garden space. Clause (c) needs a more precise definition of what 130sqm refers to. There is no definition of what constitutes a large family home but this does need to be clearly understood, and we suggest it should be a home suitable for 5 persons or more. To meet the objective of protecting the existing stock of these homes the minimum gross internal area should be increased from 74sqm to 86sqm as indicated in table 9. To fulfil the objective of ensuring access to a rear garden the minimum garden space of 40sqm specified in table 11 should be used for these conversions. Clause (c) should be clear whether the 130sqm minimum includes or excludes extensions and loft conversions. We expect this was drafted with the intention to reflect that 130sqm over two floors should be a property large enough to potentially be suitable for conversion, so it should be made clear the 130sqm refers to the property as built.</p>

Representor	Section	Summary of Comments
Marstead Living Limited/IBSA	HOU4	This policy, as drafted, is considered not to be legally compliant or sound on the basis it is not in conformity with the NPPF (2021) and London Plan (2021) and cannot be seen as having been positively prepared or effective. NPPF para 62 requires the housing needed for different groups (including older people) to be assessed and reflected in planning policies. Accordingly, the London Plan includes a specific policy (H13) for Specialist Older Persons Housing which requires boroughs to plan proactively to meet identified needs for SOPH. It follows that in order to be effective, the new Local Plan should also include policies to manage the delivery of SOPH, including identifying sites to accommodate this need. The significance of this is highlighted by the policy requirement to deliver 275 SOPH units per annum (9% of the overall housing target). As such a large proportion of the borough's overall housing requirement, it is essential that the new local plan has clear unambiguous policies to effectively manage its delivery. As currently drafted, policy provisions regarding SOPH are included in draft Policy HOU4, under the overarching banner of 'specialist housing', and more specifically 'housing choice for people with social care and health support needs'. SOPH and housing for 'people with social care and health support needs' are entirely different forms of housing (noting the definitions at Annex 2 of the NPPF and para 4.13.6 of the London Plan) with different needs and different associated policy issues. Bundling these together is therefore incapable of being an effective policy. More generally, the policy as drafted is confusing and muddled in respect to SOPH, which makes it ineffective in principle. Furthermore, in order for the plan to be sound as a whole, it should be read in conjunction with the proposed site allocations which should identify specific sites that are suitable to accommodate residential development (both conventional housing and/or SOPH), in order to accord with the London Plan. (See also comments on behalf of Marstead Living Limited/IBSA on Policies HOU01 and HOU02) For the Local Plan to be sound, it must include a differentiated policy (or as a minimum a sub-policy of HOU04) specifically relating to SOPH to reflect the importance of this provision to achieving the aims of the London Plan and meeting needs identified in the Council's own evidence base. As such it should specifically state: Support for the delivery of 4,125 SOPH homes over the period 2021-36 (at least 275 SOPH per annum). 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. This should be consistent with the London Plan Policy H12. Identify qualitative site suitability criteria; A clear policy position regarding the application of affordable housing policies to SOPH cross referring to Policy HOU01 which should be consistent with this; 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. Furthermore, the policy should be read in conjunction with the site allocations which should identify specific sites that are suitable to accommodate residential development (conventional housing and/or SOPH).
Regal JP North Finchley Ltd	HOU4	Policy HOU4 covers specialist housing including older persons accommodation. Regal JP support alternative types of living accommodation, such as those in this policy, which should be directed, in part, to town centre locations given the access to services and facilities.
Marstead Living Limited/IBSA	HOU5	This policy, as drafted, is considered not to be either legally complaint or sound on the basis it is not in conformity with the London Plan (2021) and cannot be seen as being justified or effective. Site allocation ref. 49 involves the loss of existing volunteer residential accommodation (for which there is no longer a need) to be replaced with new housing (for which there is a need). There may be other similar development opportunities elsewhere in the borough where existing sites with residential accommodation can be repurposed to better address local needs. This would conflict with Policy HOU05 as currently drafted as none of the exceptions set out at 1(a-d) would apply. Without amendment, the repurposing of sites such as allocation ref 49 would be precluded which (we assume) is not the intention of the draft policy. The policy would otherwise not be justified or effective. The wording of the policy should be amended in order to allow for the loss of existing residential accommodation where it would involve redevelopment that would re-provide residential accommodation (of the same or a different type) of equal or greater capacity for which there is demonstrable need.
TFL (Commercial Development)	Chapter 6	TfL CD generally supports the policies in this chapter which aim to create sustainable, well designed, safe and secure developments which respond appropriately to context and deliver Healthy Streets. We note the recent publication of the July 2021 revised version of the NPPF and National Model Design Code which the Reg 19 draft Local Plan may need to be updated to respond to.
Barnet Climate Action Group	Chapter 6	BCAG is highly supportive of embedding the Healthy Streets Approach into development as this will help create neighbourhoods that are sustainable, adapted or adaptable to climate change and healthy for residents in the long term. However, on Policy CDH02 (Sustainable and Inclusive Design) the requirement for development proposals to meet BREEAM 'Very good' is a low ambition for design. Other boroughs are already setting BREEAM 'Excellent' as the standard, which will result in far better developments that are less impactful in terms of carbon emissions and we would recommend that this high standard of BREEAM 'Excellent' should be set for development in Barnet.
Barnet Labour Group	Chapter 6	Development is always controversial, whatever the size of the scheme. The document needs better developed policies on co-design with local people to ensure that development is what people actually want. LB Enfield has a Design Review Panel in its local plan. Barnet's Local Plan should emphasise the

Representor	Section	Summary of Comments
		importance of good design in delivering density without high rise and in protecting the suburban and historic character of parts of the borough. The Characterisation Study needs to be revised - the main study was done in 2010, and it insufficiently protects suburban character.
Peter Piper	Section 6.13	6.13 Climate Mitigation and Carbon Reduction. This section provides no detail of the Council's "credible path to achieving net zero emissions", other than "expecting all development to be energy efficient". It is <u>completely unacceptable</u> for the plan to be so vague over such an important issue. To remedy this and thus tackle the major challenge mankind will face this century some Councils are already formulating clear and detailed strategic plans for tackling climate change. (for example, Medway. https://www.kentonline.co.uk/medway/news/councils-plans-to-tackle-climate-change-223124/) There is certainly enough expertise within Barnet to do this and it is negligent and irresponsible for it not to be given the highest priority. Under 6.13 <u>Climate Mitigation and Carbon Reduction</u> . I propose inserting: "To tackle the major challenge that mankind is likely to face this century Barnet will set up a cross-party Climate Change Member Advisory Group tasked with the remit of producing a clear and detailed strategic plan for tackling climate change."
Canal & River Trust	Section 6.23	In our previous response to the Barnet Local Plan we stated that the Welsh Harp (Brent Reservoir) has significant heritage importance within LB Barnet, and is part of the industrial heritage of the London canal network. We suggested that the Local Plan should recognise its heritage value through local-designation or its identification as a non-designated heritage asset and encourage development to protect and enhance its historic character. None of its structures are designated heritage assets within LB Barnet, but we consider that 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. Greater recognition of the heritage importance of the reservoir would be consistent with para 185 of the NPPF, which states environment
Finchley Society	Para _6.9.1	This para is too loose. Standards for light, ventilation, sense of space in new homes are described as having to be 'adequate'. Dual aspect dwellings are merely 'encouraged' Dwellings must be dual aspect. Single aspect will only be permitted in exceptional circumstances and no more than 10% of the total development. Where single aspect flats are considered acceptable they should demonstrate that all habitable rooms are capable of providing good natural ventilation, including clear opening windows. The standards of accommodation a very important for the health and well-being of the people who will live in the homes. This should be discussed at the EiP.
Brent Cross South Limited Partnership ('BXS LP'),	Para 6.18.2	This should be amended as follows in the interests of clarity: <i>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 Growth Areas such as Brent Cross, and Colindale, as well as Growth Areas and Town Centres such as Cricklewood and Edgware, as well as town centres such as Finchley Central and North Finchley and along historic routes such as the Edgware Road (A5) and the Great North Road (A1000).</i>
Finchley Society	Para 6.28.1	This para omits the need to ensure that those proposing major developments anywhere, significant developments in APAs, and anything including ground-breaking in really important places like the centre of the historic Barnet village are aware that archaeological conditions may be imposed. Add a sentence "The Council will ensure that those proposing major developments anywhere, significant developments in APAs, and anything including ground-breaking in really important places like the centre of the historic Barnet village are aware that archaeological conditions may be imposed."
Finchley Society	Para 6.34	There is lacking any explanation of the borough's Areas of Special Advertisement Control Add an explanation of the borough's Areas of Special Advertisement Control
British Sign and Graphics Association	Para 6.34.4	We are particularly concerned with para 6.34.4 (much of which is more relevant to the public realm section – advertisements cannot be placed on street furniture if that street furniture does not exist in the first place!). The advice that "shopfront advertisements will generally only be acceptable at the ground floor level, at fascia level or below" is unrealistic and unduly restrictive. Even looking at an average shopping street in the Borough (take, for example, Ballards Lane in Finchley), it is clear that there are already many, many signs displayed on business premises above fascia level. This is particularly so in the case of bracket-hung projecting signs which are traditionally hung above fascia level to allow headroom on the footway. These should not be considered "exceptional" (as in policy CDH09). They are common and very much part and parcel of most shopping streets. Any advertisement can appear "obtrusive and unattractive" and can "cause light pollution" to neighbours. This is not solely as a result of the height at which it is displayed. For instance, in Ballards Lane, the Council's own advertising banners are displayed on street lamps above the general fascia level – yet these are presumably acceptable in terms of amenity and public safety. We would suggest that the last two sentences of para 6.34.4 be deleted and replaced with: "Advertisements on shopfronts should relate well to the design of the shopfront where there is one. Generally, advertising at fascia level and below will be acceptable, as well as signs which are traditionally displayed at higher levels, for example hanging signs at public houses and on other frontages where the sign will not adversely affect the character or appearance of the upper storeys of the premises. Illuminated signs should be carefully designed and sited so that their light does not have any adverse impact on any neighbouring residential properties."
British Sign and Graphics Association	Para 6.34.6	In respect of estate agents' boards, para 6.34.6 will not be understood by anyone other than an expert in advertisement control. The Council should understand that the withdrawal of deemed consent by a direction under Regulation 7 must be approved by the Secretary of State; and that he is unlikely to

Representor	Section	Summary of Comments
		approve such a direction unless the Council has in place (following meaningful consultation with interested parties) guidelines which allow for “for sale/to let” advertising in acceptable forms (eg boards flat to the face of buildings). We suggest the last three sentences of this para be deleted and replaced with: <i>“The Regulations controlling the display of outdoor advertising generally allow the display of “for sale/to let” advertising boards (commonly called estate agents’ boards) subject to certain restrictions on size, number and position. But where these boards proliferate to the extent of causing serious harm to the appearance of a street or area, the Council may seek approval for the removal of the general approval for these types of advertising boards. In this event, the Council will provide guidance on what alternative forms of advertising properties for sale or to let are acceptable (for example, boards flat to the face of a building are far less obtrusive in the street).”</i>
Lodge Lane N12 Resident’s Association	Para 6.4.2 and 6.5.2	Consistency with national policy is not clear. The document that Barnet will use to specify design codes is incorrectly identified, and the current text of 6.5.2 implies that there will only be one design code for all Small Sites, when there should be provision for plot-specific design codes, as in the National Model Design Code.
Lodge Lane N12 Resident’s Association	Para 6.4.2 and 6.5.2	References to ‘the Sustainable Design Guidance SPD’ should be to ‘the Sustainable Design and Construction (SD&G) SPD’ – that is the full title. At 6.5.2 “Through the use of a specific Design Code for Small Sites” should be “Through the use of specific Design Codes for Small Sites” to emphasise that different small sites may have different design codes, in line with national policy.
Peter Piper	Para 6.4.5	I note that there is no mention in the plan of retrofitting Barnet’s older housing stock for higher energy efficiency 6.4.5 (CDH01) only mentions optimising energy efficiency of <u>new</u> buildings. Improving the efficiency of <u>both</u> old and new dwellings should be given the highest priority, both for the Mayor’s objective of net-zero and for the benefit of residents of these dwellings.
Brent Cross South Limited Partnership (‘BXS LP’),	Para 6.6.1	This para implies that Secured by Design Standards will be applied stringently to all schemes. In line with the London Plan, the level of compliance with Secured by Design should be considered proportionately and on a case-by-case basis. It is suggested that this para is amended as follows: <i>Measures to design out crime should be integral to development proposals, having regard to Secured by Design guidance. Where appropriate, the Council will ensure through conditions on planning consents that Secured by Design is applied.</i>
Brad Blitz	CDH01	With respect to Hendon, the Local Plan Reg. 19 should be modified to: Protect the Burroughs and Church End conservation areas from unsympathetic development, by reducing the scale, size, and massing of the proposed new student accommodation/residential homes in this highly residential area. The number of student living spaces (1700) needs to be sharply reduced and new dorms should be built on Middlesex University’s footprint. In line with the recommendations by Historic England, the Local Plan should recognise the importance of heritage assets and: Reject proposals to alter the listed Hendon Library Building, including both the exterior, interior and roof. Remove the proposed demolition of 3 Egerton Gardens from the plans for Hendon Remove the proposed demolition of 28-30 Church End from the plans for Hendon.
Roger Chapman	CDH01	Amend CDH01 insert new para a) To tackle climate change all development proposals should creatively recycle, remodel and reuse existing buildings on site. New build development will only be permitted where it can be demonstrated that the whole lifetime CO2 emissions of new build would be less than the reuse of existing buildings.
Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	CDH01	Supportive of the principle of a design-led approach to deliver optimum density on sites. However emphasis on the flexibility of design-led approach should be emphasised on a site by site basis. We request that the following text be added to para a) of proposed Policy CDH01 (the additions are shown underlined): <i><u>Flexibility should be afforded to the design-led approach to determine capacity should deliver an optimum density.</u></i> This above change would ensure that the proposed policy conforms with London Plan Policy D3 (Optimising site capacity through the design-led approach) which seeks to maximise the capacity of sites through a flexible design-led approach. These changes would ensure that the draft Local Plan positively prepared and consistent with national policy.
FORAB	CDH01	If the Planning White Paper proposals are implemented design codes will assume fundamental importance in the extent to which the community and the council can shape a proposed development. The national guidance produced so far is way short on the detail that will be required at local level. Whilst the Council states an intention to produce a design SPD there is no commitment regarding what form this might take. All we have for certain is the reference at clause (b) regarding the (inadequate) national guidance. There is nothing in the Local Plan to indicate that Barnet intends to take a robust approach to design quality through a formal review and community consultation process as indicated in para 128 of the NPPF. Given the Mayor’s recognition of the issue, and the Govt’s aspiration to markedly improve design quality, the local approach needs to radically change. Design quality is in the hands of planning officers but they are not equipped to effectively assess this. Consequently design is not a priority in the assessment of most planning applications. The London Plan

Representor	Section	Summary of Comments
		requires that schemes referred to the Mayor must have undergone a design review. There is also no provision requiring community consultation at the pre-application stage. All too often 'consultation' takes place after a developer and officers have largely agreed the detail of a scheme. PolicyCHD01 should include: A firm commitment to producing comprehensive design codes that reflect the particular circumstances of different areas of the Borough, and to identify in some detail the expectations for significant sites identified as likely candidates for development. A commitment to establish a Design Review Panel of appropriately qualified individuals to review all schemes over a certain size or in sensitive locations. As indicated in D4 of the London Plan design review should be part of the public consultation process. We also notice this policy also lacks any reference to fire safety. This features in the London Plan policy D4 and should be reflected here
Hendon Goods Yard Village Ltd	CDH01	Para A - Our client supports the overarching objective of Draft Policy CDH01 (para a) which states that residential proposals should make the most efficient use of the land by optimising density – through a design-led approach. This is in line with the NPPF (Para 125) and the London Plan (2021) Policy D3 ('Optimising site capacity through the design-led approach') which states that 'all developments must make the best use of land by following a design-led approach that optimises the capacity of sites. It is therefore considered that Draft Policy CDH01 is sound on this basis.
Brent Cross South Limited Partnership ('BXS LP')	CDH01	As per the above, this policy should be amended as follows: <i>The Council will expect development proposals to:</i> v. Adopt <i>Demonstrate how Secured by Design principles have been incorporated into the development to create safe and secure environments that reduce opportunities for crime and help minimise the fear of crime.</i>
Barnet Society Committee	CDH01	We support the views submitted by the Federation of Residents' Associations of the London Borough of Barnet (FORAB) that design guidance in Barnet is currently insufficiently clear and consistent. On a point of detail, although clause (b) explicitly mentions biodiversity, water management and sustainable drainage, energy saving does not feature in the policy itself. There must be a clear statement about the value of timely design review and the role of local design codes, not simply for small sites. Explicit mention of energy saving would also be helpful.
Barnet Green Spaces Network	CDH01	The policy is weak on seeking high quality design and thus fails to meet its stated goal. One area that is in strong need of strengthening to bring out quality is in respect of greening of developments which will be vital in the toolbox to tackle adverse climate change and to help improve biodiversity across the borough. Amend Policy CDH01 - Add following after the first sentence in para b) ... <i>Code for Small sites...."Developments will contribute to the greening of Barnet by incorporating trees, green walls, green roofs, rain gardens and other green features and spaces into the design of the scheme."</i> The Design policies are weak and require significant strengthening as we are to 'build back better', tackle climate change, improve biodiversity and create future beautiful buildings and environments. Close examination of the entirety of this policy area needs to be undertaken.
TFL (Spatial Planning)	CDH01	We welcome the added reference to the Healthy Streets Approach.
Hurricane Trading Estate	CDH01	We strongly support the Council's objective in setting out a framework to deliver high-quality design and developments, aligning with the new objective in the NPPF (NPPF) (2021) of beautiful design.
Met Police - Secured by Design	CDH01 CHW03, Para 6.6.1, Para 6.6.2 Para 6.17.1	As the Design Out Crime Officer (DOCO) for Barnet and on behalf of the Metropolitan Police Service (MPS) and Secured by Design (SBD), I fully commend and support the local planning authority for the inclusion of Secured by Design as a condition to any planning consents. This is with particular reference to policies CDH01 and CHW03 amongst other SBD references within the draft Local Plan. By helping to deliver Secured by Design in Barnet, it can greatly enhance the safety and security of those using or residing within a development and the wider environs of the local community, by using proven crime prevention measures at design, planning stage, through to construction and eventual completion. The scheme is free of charge whereby impartial advice and recommendations is provided for applicants and all those involved within the planning process, to help ensure that a safe and secure environment can be designed and constructed for Barnet and the wider community, by helping to remove crime and the fear of crime. From Secured by Design guidance (Homes 2019), 'the environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage. It also has a significant impact on anti-social behaviour'. With SBD guidance also available for commercial developments, educational establishments and so on, it is possible to apply crime prevention guidance throughout the planning stage and beyond for a whole range of different types of development to help make Barnet a safer place. These policies are fully supported.
Harrison Varma Ltd	CDH01 Para 6.4.2	Whilst the overall intent of the policy and the supporting paras are both supported, it is considered that these can be better worded in order to ensure full consistency on national policy in regard to optimising sites for residential development and ensuring well-designed places. Specifically, this relates to parts 11 and 12 of the NPPF (2021). The NPPF is clear that Local Plan policies should ' <i>optimise the use of land in their area and meet as much of the identified need for housing as possible</i> ' (para 125). Similarly, with reference to achieving well designed places it is noted at para 130 that ' <i>Planning policies and decisions should ensure that developments...optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development</i> '. The

Representor	Section	Summary of Comments
		<p>limitations on land supply and availability within the borough are clearly highlighted through the proposed Plan. This includes the level of land falling within Green Belt and Metropolitan Open Land designations and the drive to protect and enhance heritage, environmental and social assets wherever possible. This means that the use of available land must be as efficient as possible, particularly in order to deliver more than 5,000 homes (almost 15% of the overall minimum housing target over the life of the Plan) from non-designated sites as set out by Policy GSS01. Current and previous Local Plan policies have specifically stated that the loss of houses from roads traditionally characterised by houses will not normally be appropriate (for example, Development Management Policy DM01). Such policy has limited the potential to optimise the residential use of previously developed land through alternative forms of development that could offer an increased residential density compared to houses. The revised approach proposed within the new Local Plan policies remove this limitation which is welcomed and Policy CDH01 is clear that design-led residential development should deliver the optimum density from any development site. However, the policy and supporting paras as currently drafted are not clear that such optimisation could include alternative forms of housing provision (for example, flats or apartments) in locations previously characterised by houses. Given the wording of current and historic policies, it is important that the potential to deliver different forms of residential development from any site is as clear as possible within the new Local Plan. This shift in policy emphasis needs to be specifically stated so that any residential development proposal can be assessed in terms of optimisation through overall design and character and not simply whether the specific form of housing is unchanged from previously.</p> <p>This can be achieved through some minor changes to Policy CDH01 and supporting paras as set out below. By removing any potential ambiguity on this matter, this will ensure soundness through full consistency with national policy as set out above and also support the overall intent to optimise residential development capacity from all sites. Following related modifications are proposed. <u>Para 6.4.2</u> (additional text underlined)</p> <p>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. <u>The form of new residential development may differ from that traditionally prevalent in a location (for example, provision of flatted units in place of houses) where this will optimise housing delivery from a site.</u> 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 <u>Policy CDH01</u> (additional text underlined)</p> <p>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. <u>Achieving such an optimum density may include alternative forms of residential development to those traditionally found in a location, for example the provision of flatted development in place of houses.</u> This approach should consider local context, accessibility by walking and cycling and existing and planned public transport as well as the capacity of infrastructure...<i>(remainder of policy unchanged)</i></p>
Theresa Villiers MP	CDH01	Design is likely to be of importance in the Government's reforms for planning. And any schemes referred to the Mayor of London must show that a design review has been undertaken. However, it appears that design is not a priority in most planning applications submitted to Barnet. Barnet Council should have a policy relating to design which takes into account the area to which the site of the planning application refers. FORAB suggests that a Design Review Panel of qualified individuals should be established to review all schemes over a certain size or in sensitive locations. Additionally, as indicated in D4 of the London Plan, design review should be part of the public consultation process. Lastly, FORAB points out the lack of any reference to fire safety in this policy. As this is mentioned in the London Plan policy D4, the council should ensure that this is reflected in their policies.
Home Builders Federation	CDH02	Part C of the policy is unsound because it is contrary to national policy. The Council requires compliance with a BREEAM 'Very Good' rating. We recommend that the Council deletes this reference and adheres to the Building Regulations instead as the standard measure for building performance. The Government's ambitions relating to the Future Homes Standard will be measured through the changes it will make to the Building Regulations, including the planned increase in energy efficiency through Part M, that will be required from July 2022. The Council would assist the development industry if it adhered to the Building Regulations as the single, authoritative, set of standards.
Barnet Cycling Campaign	CDH02	We support the commitment to sustainable design and the BREEAM method.
Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth	CDH02	Supportive of providing sustainable and inclusive developments which are accessible to those with disabilities. However, we consider that point g) of proposed Policy CDH02 should make clear that the M4(3) requirement should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling as set out in the Planning Practice Guidance at Para: 009 Reference ID: 56-009-2015032. This would ensure that the Publication Local Plan is consistent with national policy.

Representor	Section	Summary of Comments
Cowing 1968 Settlement		
Mill Hill Missionaries	CDH02	CDH02 provides the policy requirement for sustainable design and construction, which includes that all new development should achieve a minimum BREEAM "Very Good" rating in accordance with the Sustainable Design Guidance. This policy should be updated to state that all new development should adhere to Building Regulations instead as the standard measure for building performance, to ensure the latest national standards is measured.
Barnet Liberal Democrats	CDH02	We believe that, particularly in light of the difficulty of retrofitting insulation to older housing stock, Barnet needs to be ambitious about well-designed homes that are designed to minimise the impact on climate change. We believe that new buildings should be built to BREEAM of at least Excellent. Modifications: We believe that new buildings should be built to BREEAM of at least Excellent.
Canal & River Trust	CDH03	The recent reservoir draw-down showed plastic pollution to be a key issue at the Welsh Harp (Brent Reservoir). We suggest that policy CDH03 might helpfully include a policy requirement for public realm plans to incorporate strategies that seek to prevent littering and fly-tipping. We can explore working together with Barnet (along with Brent) to develop plans to tackle plastic pollution at the Welsh Harp (Brent Reservoir) if there is a plan to increase visitor numbers.
Barnet Cycling Campaign	CDH03	We support the use of Healthy Streets Indicators but the policy needs to set minimum acceptance criteria for healthy streets scores. Barnet performed poorly in the recent Healthy Streets Scorecards at 24thplace. We want Barnet to be the leading Outer London borough for Healthy Streets.
Hurricane Trading Estate	CDH03	We strongly support the Council's objective to deliver high-quality, inclusive and effective public realm as part of development proposals to contribute to the delivery of placemaking, social interaction and the health and wellbeing of residents. This is in accordance with Para 130 (f) of the NPPF (2021) which states that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. SGiven its prominent location between the existing neighbourhoods of Grahame Park to the north and Beaufort Park to the south, the Site represents an overlooked opportunity to provide a key piece of public realm to transform and revitalise Avion Crescent. Further, Policy T2 ("Healthy Streets") of the London Plan states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. In its existing format, Avion Crescent does not facilitate connectivity between the Site and the wider area, acting as a functional transitional route that offers little by way of useable public realm. The provision of an enhanced public realm and active frontage along Avion Crescent would reduce the local dominance of vehicles, promoting the principles of building sustainable, healthy and walkable neighbourhoods. Indeed, the Site could deliver a significantly improved pedestrian environment with the promotion of a more cycle-friendly route between Grahame Park and Colindale Underground Station.
Lodge Lane N12 Resident's Association	CDH04	Tall buildings policy contains a number of errors that could lead to misinterpretation. See text below. More generally, it would be better to define tall (and very tall) buildings in relation to their immediate surroundings, to be more sensitive to the local character of an area. c) reference to part d) should be to part e) d) should say "produce [an] SPD..." e) should say "Proposals for Tall and Very [Tall] Buildings..." Consistent title case for Tall and Very Tall Buildings would be clearer, to emphasise that they are defined terms.
Historic England	CDH04	We continue to have concerns regarding this policy. As set out, we do not consider it conforms to policy D9.B2 of the 2021 London Plan, which requires that appropriate heights (as well as locations) of tall buildings are defined in boroughs development plans. While we note the intention indicated in the Plan to prepare a Supplementary Planning Document which would contain further detail on heights, this would not form part of the Plan itself given its presence in the proposed SPD. We further consider that the current draft is therefore ambiguous in relation to tall buildings, both with regard to the nine strategic locations identified in CDH04 and those site allocations where tall buildings are also identified as potentially appropriate. As a result, we consider the Plan is potentially contrary to para 16 d of the NPPF that requires local policies to be clearly written and unambiguous. While we would stress that we do not have any in-principle objection to tall building proposals in the strategic locations, it is clearly important that the full extent of potential adverse impacts of such proposals on the historic environment are understood at a stage in the plan-making process early enough to ensure they are avoided. We therefore consider that further work is required to define appropriate height ranges within the relevant sites in the Schedule of Site Proposals at Annex 1.
Ian Dunkin	CDH04	Section (e) gives criteria for assessing proposals for tall and very tall buildings, including consideration of frontage and impact on the public realm but does not consider impact in areas close to low-rise residential properties. For several of the strategic locations listed, including North Finchley, development sites often front areas of low rise residential properties, and impact on these should be a factor for approval or rejection of proposals. Add to CDH04 para (e) a section (vii): vii: how the building impacts neighbouring low-rise residential properties, through overshadowing, impact on views, and impact on residential character

Representor	Section	Summary of Comments
Environment Agency	CDH04	Policy CDH04 has been revised based on our advice at the regulation 18 stage. We support part (v) of the policy and para 6.8.11 which outlines that tall buildings should be set back from rivers and watercourse so as not to cause harm to wildlife, including directing artificial light away from the river corridor. Para 6.8.11 explains that tall buildings should be set back further, more than 10 metres from the watercourse. We support the policy and consider it is sound and compliant with aims of the NPPF particularly those relating to the protection and conservation of the Natural Environment. This will also compliment the objectives of the Thames River Basin Management Plan in avoiding further deterioration and seeking to restore and enhance watercourses.
LB Brent	CDH04	Whilst understanding and supporting LB Barnet's desire for some flexibility in relation to the location of tall and very tall buildings, the Council is not sure that the policy is positively prepared and consistent with London Plan Policy D9 which does not appear to allow the flexibility Barnet's policy seeks. For example CDH04 does not provide sufficient clarity on the likely locations of very tall buildings and their potential height. The evidence base identifies some appropriate locations for very tall buildings. These places however are not adequately reflected in the policy and neither are the heights. To provide more certainty, and be consistent with the Brent locations identified for what would in Barnet be identified as appropriate for very tall buildings, it could perhaps be amended to: <i>"The following locations are considered appropriate for Tall Buildings (8, etc). The following locations (list as set out in the Tall Buildings Study 2019) are appropriate for very tall buildings....."</i>
John Lewis Partnerships	CDH04	The current drafting of Policy CHD04 Tall Buildings indicates that Tall Buildings may be appropriate in strategic locations listed in the policy. This list does not include Mill Hill East, the only growth area where tall buildings are not identified. Whilst tall buildings may not be appropriate across the Mill Hill East area, immediately adjacent to Mill Hill East Station there is an opportunity to optimise development. One way to achieve this would be with taller buildings on the site. The potential of Tall Buildings should be recognised in this location. This would make it consistent with other strategic locations. It would also make the policy consistent with NPPF Policy (Para 125 a) which states plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. The NPPF rightly recognises that locations that are well served by transport being particularly suitable for denser development. Policy CHD04 should be updated to make it consistent with national policy. Similarly, 'Very Tall' Buildings are also considered appropriate in this growth area location with strong public transport links. The policy wording should be updated as set out in bold. Additions are shown in bold . <i>a. Tall buildings (8 to 14 storeys (26 to 46 metres above above ground level)) may be appropriate in the following strategic locations:</i> <ul style="list-style-type: none"> • <i>Brent Cross Growth (Opportunity) Area (Policy GSS02);</i> • <i>Brent Cross West Growth (Opportunity) Area (Policy GSS03)</i> • <i>Colindale Growth (Opportunity) Area including Grahame Park Estate (Policy GSS06);</i> • <i>Cricklewood Growth (Opportunity) Area (Policy GSS04);</i> • <i>Edgware Growth Area (Policy GSS05);</i> • Mill Hill East (Policy GSS07) (on sites close to the Station) • <i>West Hendon Estate (Policy GSS10);</i> • <i>New Southgate Opportunity Area27 (Policy GSS09);</i> • <i>Major Thoroughfares - Edgware Road (A5) and Great North Road (A1000) (Policy GSS11); and the Town Centres of Finchley Central and North Finchley (Policy GSS08)</i>
Betterpride Ltd	CDH04	Part b) states that: "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". We agree that siting within an Opportunity or Growth Area should be considered the correct circumstances for very tall buildings. However, this further highlights the need for the allocated Site 27 description to be updated to show that this site is an "appropriate siting" within the Edgware Growth Area for very tall buildings.
Landsec	CDH04	Landsec strongly support the amendment to Part C which removes the 28-storey height limit for Very Tall Buildings, which was not supported by the Borough's evidence base (2019 Tall Buildings Update). It is noted the Tall Buildings Update Document (2019) identifies the Finchley High Road (A1000) Major Thoroughfare as suitable for tall buildings of between 8 and 14 storeys. Landsec continues to consider that Major Thoroughfares should be considered as appropriate locations for Very Tall Buildings (15 storeys or more), as well as Tall Buildings (8 to 14 storeys), taking into consideration a site-specific assessment, including local contextual factors and the wider planning and public benefits offered by any such scheme. As set out above, neither the Draft Local Plan nor the Changes to the Policies Map (Reg 19) identify locations for tall buildings, and this is inconsistent with London Plan Policy D9 and therefore not considered sound. It is requested that the Draft Local Plan and the Draft Policies Map is updated to clearly identify on maps all locations where tall buildings may be an appropriate, and the appropriate tall building heights. This must include the areas identified in Draft Policy CDH04, including Major Thoroughfares which includes the GNLP site.
Regal JP North Finchley Ltd	CDH04	Draft Policy CDH04 recognises that tall buildings (8 to 14 storeys) are appropriate in strategic locations, including North Finchley town centre. Regal JP support North Finchley being identified as a potentially appropriate location for tall buildings, and the recognition of the contribution that carefully designed tall

Representor	Section	Summary of Comments
		<p>buildings can make to the delivery of sustainable growth. The policy explains that tall buildings of 15 storeys or more ('Very Tall') are not to be permitted unless exceptional circumstances can be demonstrated. The policy provides an example being the appropriate siting within an Opportunity Area or Growth Area. District Centres should also be specifically referenced, especially as some Growth Areas represent smaller town centres than District Centres such as North Finchley, they are planned to accommodate a smaller scale of growth than District Centres and have a lower public transport accessibility rating. Consistent with Policy D9 of the London Plan, the Council should carefully consider the wording of this policy to ensure it correctly identifies the locations that may be suitable for tall buildings. The Council can of course rely on the fact that any tall building will need to satisfactorily address the criteria set out in the policy, and therefore sufficient controls are in place to refuse unacceptable proposals.</p>
Comer Homes Group	CDH04	<p>The Characterisation Study states that areas of growth are likely to evolve significantly as has been proven by the NLBP site. The Council's vision for the NLBP site has clearly evolved and expanded slowly over time, not keeping pace with the capacity identified. Beginning with the 2006 Brief seeking 400 homes on such a large strategic brownfield site, up to 1,000 homes in the Regulation 18 Local Plan site allocation, the site now has planning permission for over 1,350 homes. The Council has failed to recognise the weight that must be given to the 2020 permission granted by the SoS which supported the findings of the reporting Inspector that the site is appropriate for buildings up to 9 storeys, which by LB Barnet's definition, are tall buildings. Both the Inspector and SoS agreed that the existing character of the North London Business Park is entirely different to the surrounding area and as existing it does not contribute towards the character and appearance of the area. Both felt that the appearance, scale, mass, height and pattern would not adversely affect the character and appearance of the area. It was considered that the proposed layout and height strategy for the development was appropriate to the current character of the site and that the taller buildings would not be visually obtrusive to those living around the site and that whilst the taller buildings would be visible from locations in the surrounding area, they would primarily be part of the background cityscape, a characteristic of London even in the suburbs.</p> <p>Given the pressures for housing, intensification of brownfield sites and in the context of the recent planning permission, it is clear the Council has consistently failed to recognise the full potential of the site, steadily carrying forward outdated and restrictive parameters, primarily the number of homes that can be provided and the building heights that would be appropriate. We take this opportunity to highlight to reinforce the LB Barnet's irrationality for not including the NLBP site as an area where tall buildings may be appropriate, with only the latest Tall Buildings Update (2019) in the evidence base to support this, albeit without justification and having skewed the information relating to NLBP's planning application at the time. In any case, the Tall Buildings Update pre-dates the SoS decision and no evidence has been submitted by LB Barnet to quash the SoS decision as the most relevant and up-to-date as required by Para 31 of the NPPF. These representations do not seek the Council to concede that the site is appropriate for unlimited numbers/storeys of tall buildings. The wording of Policy CDH04 is clear in that the identified locations are those which "may" be appropriate and that evidence would still need to be demonstrated for tall buildings to be accepted. Barnet's policy team have no evidence in the evidence base sitting behind the draft Local Plan which justifies the contempt for the NLBP site being appropriate for tall buildings. The draft Local Plan would be ineffective and unjustified to overlook a site which has the benefit of extant planning permission authorising tall buildings, on a site that has capacity for this and more, and which has been assessed by the SoS as being suitable for tall buildings. This also causes internal conflicts with the wording of draft Policy GSS01 of the draft Local Plan. In light of the SoS decision to approve buildings in excess of 8 storeys, the NLBP site must be listed in its own right within draft Policy CDH04 as being suitable for tall buildings otherwise the Local Plan is not sound and therefore contrary to Para 36 of the NPPF. The policy must be updated to align with the recent 2020 decision and needs to take a more positive position in its preparation to align with the wider aspirations for optimisation, intensification and growth. To the contrary, as currently drafted Policy CDH04 is a barrier to further sustainable forms of development being brought forward on this allocated site which is not aligned with the objectives of the NPPF. To summarise, conflicts with the NPPF are set out below: Para 15 of the NPPF states that the planning system should be genuinely plan-led and that succinct and up-to-date plans should provide a positive vision for the future of each area. Policy CDH04 should not be using out-of-date evidence and should not be relying on the securing of planning permission to determine the parameters of what the NLBP site is capable of achieving. Looking to the future, our client has demonstrated that there are further opportunities to be captured on the site which the Council have ignored in favour of the out-of-date evidence base. The draft Local Plan is therefore in conflict with Para 15 of the NPPF. Draft Policy CDH04 has not been drafted with the objective of contributing to the achievement of sustainable development and has not been prepared positively or in a way that is aspirational or deliverable despite the 2020 permission and ongoing pre-application and policy discussions demonstrating what is achievable. The draft policy therefore conflicts with Para 16 of the NPPF. Draft Policy CDH04 is not underpinned by relevant or up-to-date evidence and therefore conflicts with Para 31 of the NPPF. The omission of the NLBP site being identified as a site that may be appropriate for tall buildings renders Policy CDH04 and indeed the draft Local Plan unsound. These representations have highlighted LB Barnet's negative stance towards the NLBP site meaning the policies that are relevant to NLBP have not been positively prepared, have not justified the disregard for the NLBP site and is not effective. The draft policy is therefore inconsistent with Para 35 of the NPPF and the Local Plan is not sound.</p>

Representor	Section	Summary of Comments
Ballymore Group and TFL Commercial Development	CDH04	We support the Council's ambition regarding 'Very Tall Buildings' as per draft Policy CDH04. This policy supports, Very Tall Buildings (15+ storeys) in a designated Growth Area including the Edgware Growth Area. This approach is consistent with London Plan Policy D3 which seeks to ensure that site capacity is optimized through the design-led approach, particularly in well-connected locations. Edgware is the borough's only designated Major Town Centre as per the London Plan's town centre hierarchy and is therefore an appropriate location for growth. We therefore agree with the Council's ambition that the Edgware Town Centre is appropriate for Very Tall Buildings.
DTZ Investors UK Ltd	CDH04	CDH04 defines tall buildings as those which are between eight and 14 storeys, and very tall buildings are defined as those which are 15 storeys and above. The policy states that very tall buildings will not be permitted unless exceptional circumstances can be demonstrated, but it does list a number of strategic locations where tall buildings may be acceptable, one of them being the NSOA. The Site is included within the NSOA, which is identified as one of the potential locations for tall buildings. The Site meets the criteria for tall buildings as set out in the Tall Buildings Update, London Plan Policy D9 and in the supporting text for draft Policy CDH04. The site is well-connected by public transport and has good access to services and amenities. It does not affect any locally important views as set out on Map 4 of the Draft Barnet Local Plan and there are no nearby heritage assets. DTZ is supportive of the identification of the NSOA as an appropriate location for tall buildings as it presents a suitable opportunity to deliver a significant number of homes. Tall buildings on the Site would optimise its capacity. As set out in the representations to draft Policy GSS01, DTZ propose that the boundary of the NSOA is clearly defined, to provide certainty for developers with regard to appropriate locations for tall buildings. DTZ considers that this amendment is necessary to ensure that draft Policy CDH04 is effective and consistent with national policy, by making effective use of the Site.
Barratt London	CDH04	London Plan Policy D9 (B) relates to locations of tall buildings and is split into three limbs. The first two limbs require Boroughs to determine if there are locations where tall buildings may be an appropriate form of development. These locations and appropriate tall building heights should be identified on maps in Development Plans. The third limb, Part B(3) states that tall buildings should only be developed in locations that are identified as suitable in Development Plans. The former West Hendon is listed as an identified location for tall buildings under emerging policy CDH04(a) and therefore would be London Plan Policy D9(B) compliant. However, we are concerned that emerging policy CDH04(a) refers to 'buildings of 8 to 14 storeys' which may be appropriate at strategic locations only, including West Hendon. Tall buildings of 15 storeys or more which are defined as 'very tall' will not be permitted unless exceptional circumstances can be demonstrated. Two examples are given such as an Opportunity Area or Growth Area. West Hendon is not currently identified in either despite it still forming part of the adopted Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework SPG. For this policy to be sound under para 35 of the NPPF, policies should be positively prepared, justified and effective. In our opinion, this policy is not sound because the evidence base underpinning the emerging plan does not reflect the practical implications of the extant planning permission and the physical development on Site. The former West Hendon Estate is located to the south-west of the Borough and is one of the Council's Key Priority Housing Estates for Regeneration under the currently adopted Barnet Local Plan (Core Strategy, 2012), forming part of the Barnet's Three Strands Approach "Protection, Enhancement and Growth" which sought to guide regeneration in the Borough. It was approved planning permission in 2013 for the demolition and redevelopment of the Estate to accommodate up to 2,000 homes in buildings ranging from 2 to 29 storeys as well as associated landscape and highway works, and the provision of two new pedestrian bridges across the Welsh Harp. Specifically, four new tall buildings of between 18-29 storeys will front the York Park along the water's edge. Emerging policy CDH04(a) which refers to 14 storeys is inconsistent with this permission. It also demonstrates that West Hendon should be categorised under CDH04(b) where very tall buildings are appropriate. 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). The Tall Buildings Update (2019) document provides an overview of how buildings heights will be considered throughout the Borough however there is no townscape, heritage, and visual impact analysis available to the public as part of this report or as a standalone evidence base to the local plan consultation. For that reason, Barratt London propose the following amendment to Policy CDH04(a) and the removal of reference to 8 to 14 storeys because it is not supported by an appropriate local plan policy evidence base: "a. Tall buildings (8 to 14 storeys (26 to 46 metres above ground level)) may be appropriate in the following strategic locations...Barratt London also consider that the supporting text at para 6.18.6 be amended to read: "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). <i>When determining planning applications for tall buildings, detailed townscape and visual impact analysis will be required for planning applications to determine the appropriate heights specific to a location.</i> " Barratt London welcome the removal of the maximum limit of 28 storeys for very tall buildings from Policy CDH04(b), however are still concerned with the current wording around exceptional circumstances and Opportunity Areas/Growth Areas. What constitutes "exceptional circumstances" is somewhat ambiguous however to have it grouped together with Opportunity Areas/Growth Areas could limit otherwise acceptable development which should be determined via a design-led approach in accordance with the London Plan. For this reason, Barratt London propose the following amendment to Policy CDH04 (b): "b) Tall buildings of 15 storeys or more ('Very Tall') will not be permitted unless exceptional circumstances can be demonstrated, or they are such as appropriately sited within an Opportunity Area or Growth Area. As

Representor	Section	Summary of Comments
		per our comments under policy GSS01, we suggest that West Hendon be included as a growth area particularly as it still forms part of the adopted Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework SPG.
Hendon Goods Yard Village Ltd	CDH04	Para A - Draft Policy CDH04 sets out the preferred, strategic locations and Growth Areas for tall buildings in the Borough, in accordance with the London Plan 2021 (Policy D9) – which is considered a sound approach. However, our client considers that the Existing Transport Infrastructure of Hendon Station should be included under this policy, to be in line with optimisation objectives of Draft Policy GSS09 and in the interests of ensuring the delivery of sustainable growth at key transport nodes, in line with Draft Policy GSS01. Further, as connectivity is planned to be further increased at Hendon station by way of Crossrail 2 and the WLO, it is considered that opportunities for tall buildings at underutilised land adjacent to the station should be explicitly recognised. Indeed, this is acknowledged under supporting text 6.18.3 which states that due consideration should be given to existing and planned supporting infrastructure when assessing tall building locations, with proposals occurring in the most suitable and sustainable locations. We would therefore request that Draft Policy CDH04 is reviewed by the Council to ensure it compliments Draft Policies GSS01 and GSS09 before it is submitted for Examination.
Brent Cross South Limited Partnership ('BXS LP'),	CDH04	We welcome the fact that Brent Cross is recognised as a location for tall buildings but consider that greater clarity is required in the wording of the policy. 'Appropriate siting' is not clearly defined; it is assumed that this means compliance with the criteria listed in Part (e), in which case the words 'appropriate siting' are not required. We also query whether location within an OA or Growth Area would alone be sufficient to demonstrate 'exceptional circumstances.' The word 'Opportunity' after the name of each Growth Area is not required.
Berkeley Group (on behalf on St James Group Limited/St William Homes LLP	CDH04	The requirement of a design led approach to deliver optimum densities as set out in policy CDH01 (a) is fully supported. The London Plan makes it very clear within Policy D9 that 'Tall buildings should only be developed in locations that are identified as suitable in Development Plans'. Recent decisions made by MHCLG, indicate that, in London, any tall buildings not identified in the Development Plan should not be accepted. Para 6.18.5 of the draft Local Plan references Barnet's Tall Buildings Study Update; this document provides the evidence base to establish areas of the Borough that could be appropriate for tall buildings. These locations include Opportunity Areas as well as town centres and major thoroughfares. As highlighted within previous representations, draft Policy CDH04 'Tall Buildings' does not fully reflect the evidence base. Whilst it recognises opportunity areas, growth areas and major thoroughfares as suitable for tall buildings (8 to 14 storeys) it only recognises 2 town centres areas as being appropriate for taller buildings and disregards all other town centres as suitable locations. This approach undermines the Mayor's policies which seek optimised growth and housing delivery on 'suitable brownfield sites within 800m of town centre boundaries', it also undermines and contradicts part (a) of the Council's draft policy CDH01, which states: '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. ' As currently worded, policy CDH04 omits any future opportunity for any tall building to come forward within other town centre locations; inadvertently, this sets a blanket approach for all town centre sites (irrelevant of any design led analysis or other site considerations), that onerously restricts any element of developments in these accessible locations to be no more than 7 storeys. As an indirect consequence, this will suppress housing numbers, impact development viability and hinder housing delivery across the borough. The current draft CDH04 policy also contradicts the spatial strategy and policy GSS08 of the draft plan where it is recognised that town centres have a vital role in delivering growth and new homes. It is suggested that draft policy CDH04 part (a) includes town centres (including district centres) within the definition of areas that may be appropriate for tall buildings. Any such sites that come forward would still have to satisfy part (e) of this policy - the requirement to demonstrate site suitability for a tall building through a design led approach and full assessment. As currently worded draft policy CDH04 is in conflict with other areas of the draft local plan, does not conform to the London Plan and does not fully meet the soundness test as required by the NPPF.
GLA – Planning	CDH04	The Mayor notes that Barnet defines a category of 'very tall' buildings of 15 storeys or more in Policy CDH04. It would be helpful if the policy clarified if the appropriate locations for 'very tall' buildings is the same as for tall buildings, or is a sub-set of those locations.
OmnIState 360 Burnt Oak Broadway	CDH04	Whilst 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, it is considered that further modifications are necessary to make this policy sound. the policy should be strengthened to ensure that suitable locations are optimised to deliver much needed housing. The policy currently fails to identify major thoroughfares on a map with appropriate heights and is too vague to fully comply with London Plan Policy D9.As per our comments on GSS11, to comply with London Plan Policy D9, the policy should identify the strategic locations appropriate for tall buildings on the Local Plan Proposals Map.
TFL (Commercial Development)	CDH04	TfL CD maintains it concerns in respect of the tall buildings policy because the issues raised in our Reg 18 representations have not been addressed. It is proposed that 'very tall' buildings will only be permitted in exceptional circumstances. One very limited example of exceptional circumstances is provided (appropriate siting within an Opportunity Area or Growth Area) and we consider that this should be extended. For example, the significant public realm and townscape improvements sought by the Council will only be secured at our Finchley Central site (see below) if an appropriate and viable scale of

Representor	Section	Summary of Comments
		<p>development (likely to include very tall buildings) can be achieved. In addition, we believe that a design-led approach to 'very tall' buildings would be appropriate, in accordance with London Plan policy D9.</p>
Barnet Society Committee	CDH04	<p>We agree with the comments of the Federation of Residents' Associations of the London Borough of Barnet (FORAB), particularly in relation to the need for a more nuanced and localised definition of tall buildings that would protect low-rise neighbourhoods, where anything over four storeys might appear tall. 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 proposed blocks looming over Victoria Recreation Ground. 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. Produce guidance, in the proposed SPD on Building Heights or elsewhere, to protect low-rise neighbourhoods from buildings that are lower than eight storeys but incongruous with their locality. Designate locations where clusters of tall buildings would be permitted, with substantial distances between clusters.</p>
Ropemaker Properties Ltd	CDH04	<p>The locations identified in Policy CDH04 include the majority but not all of the areas where development is to be directed as per the first four chapters of the BLP (Reg 19). It does not refer to the enhanced opportunities provided at areas in proximity to the West London Orbital (WLO) stations. The specific effect of this is that Policy CDH04 does not currently provide in principle support for development for taller buildings around Hendon station (development around Cricklewood and Brent Cross West stations being embraced by other criteria). This is despite in principle support for taller buildings along the Edgware Road Major Thoroughfare which is located in close proximity and indeed there have been a significant number of recent permissions with very tall buildings in the immediate vicinity (the tallest of which are actually set back away from Edgware Road towards the boundary of the Garrick Road Industrial Estate which itself is located adjacent to Hendon Station) which implies that the area is an appropriate location for tall buildings. The criteria set out in Policy CDH04 make no reference to access to public transport. This appears to be an oversight given that para 6.18.2 of the BLP (Reg 19) states that <i>'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'</i>. Policy CDH04 should make provision for the potential for development for taller buildings around Hendon station to coincide with the opportunities presented by the major infrastructure works proposed by the WLO. This is consistent with the evidence base and para 6.18.2 and NLP Policies H1, D9 and para 3.9.1.</p> <p><i>'a. Tall buildings (8 to 14 storeys (26 to 46 metres above above ground level)) may be appropriate in the following strategic locations:</i></p> <ul style="list-style-type: none"> • <i>Brent Cross Growth (Opportunity) Area (Policy GSS02);</i> • <i>Brent Cross West Growth (Opportunity) Area (Policy GSS03);</i> • <i>Colindale Growth (Opportunity) Area including Grahame Park Estate (Policy GSS06);</i> • <i>Cricklewood Growth (Opportunity) Area (Policy GSS04);</i> • <i>Edgware Growth Area (Policy GSS05);</i> • <i>Hendon Station (Policy GSS09);</i> • <i>West Hendon Estate (Policy GSS10);</i> • <i>New Southgate Opportunity Area27 (Policy GSS09);</i> • <i>Major Thoroughfares - Edgware Road (A5) and Great North Road (A1000) (Policy GSS11); and the</i> • <i>Town Centres of Finchley Central and North Finchley (Policy GSS08)'</i>
Sanjay Maraj	CDH04	<ol style="list-style-type: none"> 1- Enabling Tall Buildings undermines one of Barnet's key objectives: "To conserve and enhance the historic environment of the Borough, particularly the distinctive character and identity of Barnet's town centres and suburbs" 2- 6.18.3 – design led is positive, however, no reference is made to safety which is a fundamental aspect to any development – the Hackitt enquiry and imminent Building Safety Bill put safety at the centre building construction and maintenance, with the need for building owners to maintain digital records. 3- 6.18.8 – no consideration for water courses, artesian wells, that are prominent in town centres, and impact the structural integrity of developments and impacts neighbouring buildings 4- 6.18.10 – suggests medium build are more sustainable, and cost less, so with this evidence why not have a Medium building policy, not a Tall Building policy? 5- Policy e iv and v – ground water flow should be included as a factor in the relationship between the building and the public realm, as this can have an adverse environmental impact on neighbouring buildings

Representor	Section	Summary of Comments
		<ol style="list-style-type: none"> 1 Where tall buildings are approved, there should be budget set aside by the developer so that investments/solutions can be made within the local area ensuring meaningful character is kept. The proposed solutions should be clearly explained during the planning process so that the local community affected by the tall buildings, can understand how their needs are being considered 2 6.18.3 – include reference to safety, and the use of digital, to create transparency on the construction and in-life maintenance of buildings – eg with owners being required by law to have digital records, will make it easier for the council to assess progress against plans 3 6.18.8 – consideration should be given to water courses, artesian wells, ensuring developers are able to evidence hydrological impact not just within the development site, but also the surrounding neighbourhood. 4 6.18.10 – suggests medium build are more sustainable, and cost less, so with this evidence why not have a Medium building policy, not a Tall Building policy? <p>Policy e iv and v – ground water flow should be included as a factor in the relationship between the building and the public realm as this can have an adverse environmental impact on neighbouring buildings</p>
Clarion Housing Group and the Huntingdon Foundation	CDH04	<p>Draft Policy CDH04 defines a very tall building as 15 storeys and above. Draft Policy CDH04, it's supporting paras and the Tall Buildings Update (2019) which forms part of the Draft Local Plan's evidence base fails to set out any reasonable justification as to why tall buildings are defined as being between 8 and 14 storeys and why very tall buildings are defined as being 15 storeys and above. As such, Draft Policy CDH04 is considered unsound in the context of NPPF (2021) Para 35 on the basis it is not justified or effective. Within the Colindale Growth Area there are a no. of tall buildings which extend above 15 storeys, for example emerging developments in the Growth Area extend up to 28 storeys. We consider it inappropriate to set a singular definition for a tall building and for a very tall building for the entirety of LB Barnet. London Plan (2021) Policy D9 is explicit that Development Plans should define what is considered a tall building for specific localities, the height of which will vary between different areas. Whilst Draft Policy CDH04 recognises the potential for very tall buildings within Growth Areas and Opportunity Areas, this reference should be strengthened to specifically support taller building within Growth and Opportunity Areas and as means of ensuring sites are genuinely optimised to demonstrate soundness and compliance with NPPF (2021) Para 130 and the London Plan (2021) which requires planning polices to optimise the potential of sites to accommodate and sustain appropriate development. Draft Policy CDH04 should be modified to make reference to a tall building's ability to optimise a site's development potential at an appropriate density, given their locations within Growth / Opportunity Areas in accordance with London Plan (2021) Policy D3 and the NPPF (2021). It should be clear that the appropriate height and scale of development should be the result of a design led process in accordance with the London Plan (2021).</p> <p>We request Criteria B of Draft Policy CDH04 is modified as follows: "b) Tall buildings of 15 storeys or more ("Very Tall") will not be permitted unless exceptional circumstances can be demonstrated. Development of very tall buildings will be directed towards the Borough's Opportunity Areas and Growth Areas. Very tall buildings will be supported in these locations where they optimise the site's development potential and achieve an appropriate density that represents an appropriate design solution in regard to the site's character and context.</p>
CasaBella Developments	CDH04	<p>The Draft Local Plan identifies that tall buildings may be appropriate in specified strategic locations, including along a Major Thoroughfare, such as the A5 Edgware Road. This approach is supported so to make best use of land in a sustainable location and to reflect the evolving character of this corridor. Map 4 of the Draft Plan 'Locally Important Views' has been updated to show 'Strategic Tall Buildings Locations'. It is considered that all Major Thoroughfares, including the Edgware Road should be considered as Strategic Tall Buildings Locations' due to the identified potential of these locations for infill and intensification, whilst being supported by good transport infrastructure. Such strategic development would assist in achieving residential intensification along the Edgware Road and make a positive contribution towards increasing the delivery of housing. The Plan itself or supporting text should make clear that the boundaries of the 'Strategic tall building location' show 'broad or indicative locations' rather than definitive boundaries, and that proposals for tall buildings will be assessed on a case for case basis having regard to townscape and visual impact analysis and the criteria listed in London Plan 2021 and part e) of the CDH04. policies. In turn such changes would assist in demonstrating that the Draft Plan meets the NPPF test of being positively prepared.</p> <p>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.</p>
Theresa Villiers MP	CDH04	<p>In my view, a building should be considered "tall" if it more than six storeys. I would also express concern about the implication that buildings of eight storeys or more could be considered suitable for the Great North Road. This may be a main road but it passes through the low-rise outer suburb part of our borough for which eight storey buildings are completely inappropriate. However, I support the principle that tall buildings should be confined to certain designated areas and should be turned down in other places. Blocks of six or seven storeys would seriously intrude into views from open spaces and green belt if allowed outside specified locations. An example of this was in the application for the Victoria Quarter site. Under these proposal, blocks of flats would overlook the adjoining park and existing housing. The detriment to the landscape, particularly in Victoria Recreation Ground, resulting from these proposals would reduce many residents' amenity and enjoyment of what has long been, and remains, a neighbourhood populated by largely by low-rise semi-detached</p>

Representor	Section	Summary of Comments
		and terraced family housing. As Barnet is predominantly low rise, the council needs to assess all areas of the borough to set an upper limit for each area so that inappropriate planning applications for tower blocks – such as the North London Business Park – would fail. This is an issue in which my constituents have concerns and I wish to elaborate on the need for a review to determine what is acceptable in each area.
Thames Water Utilities Ltd	CDH06	Thames Water support Policy CDH06 in relation to basement development, but request that the Policy is strengthened by requiring all basement development to incorporate a positively pumped device or other suitable flood prevention device to avoid the risk of sewage backflows which can cause sewer flooding. This is because the wastewater network may surcharge to ground level during storm conditions. Such measures are required in order to comply with the NPPF which highlights the need to avoid flooding and also in the interests of good building practise as recognised in Part H of the Building Regulations.
Barnet Cycling Campaign	CDH07	There Local Plan has no clear policy covering the widespread conversion of front gardens into driveways [outside of conservation areas]. We suggest this is required to avoid degrading the local character of all streets and the environmental damage caused by loss of drainage and biodiversity.
Barnet Green Spaces Network	CDH07	There is inconsistency between the supporting text and policy prescription in respect of front garden parking. Supporting text gives the impression that front garden conversions to hardstanding will be refused where there is harm to character and appearance of a conservation area (6.25.7) and where garden development is considered to be detrimental to local character. (6.22.7) However this text is not followed through into policy prescription which is weak.VFront garden parking hardstanding not only creates these issues but where planning permission is required i.e. on classified roads safety issues also need to be taken into account for pedestrians and cyclists. Biodiversity is also often lost, and hardstandings contribute to increased surface water flooding. In the light of these issues a stronger policy prescription is called for. Additional background on this subject can be found at: https://www.nationalparkcity.london/frontgardens and https://frontgardens.nationalparkcity.org/ Reword b) ii) to read: “Permeable, well designed and planted front gardens help reduce surface water runoff, increase biodiversity and add character to local neighbourhoods. Planning permission for parking in front gardens and other hardstanding will be refused. Parking in front gardens is a controversial issue and needs to be thoroughly examined and debated. It contributes significantly to surface water runoff and decreased biodiversity.
Barnet Green Spaces Network	CDH07	The importance of trees is lost within this policy and the value of ancient woodland, veteran trees and hedges is not recognised. London Plan Policy G7 Trees and Woods says that Boroughs in their development plans should ‘protect veteran trees and ancient woodland and identify opportunities for tree planting in strategic locations. This is not done in the Barnet Plan and this inadequacy should be addressed. In terms of proposals the Great North Road Hedge (see separate sheet) would look to ensure that major thoroughfares through the Borough would be green, offer shade in terms of minimising the heat island effect of Climate Change and be a major boost to tackling the impact of air pollution. Remove item iv) from policy CDH07. Create new policy: CDH07A Trees, woodland and hedges Development proposals must protect all existing trees and hedges and safeguard their root systems during development. Additional trees, hedges and vegetation should be incorporated wherever possible. Veteran trees and ancient woodland will be protected, and their conservation and long-term management supported. Add Great North Road Hedge (see separate sheet) to proposals map and include new para in section on Trees, woodland and hedges: The Council supports the concept of the Great North Hedge running along the A1/A1000. Joining Communities. Plant, insect, bird, animal and human. The proposal would eventually link London to Edinburgh along both the A1 and A1000 by way of hedge, tree and wildflower planting in fields, school grounds, parks, and open spaces together with buildings using green walls, roofs and green infrastructure will join plant, insect, bird, animal, and human communities across the country. Running through urban, suburban, and rural communities the hedge would help to tackle air pollution, create habitats for wildlife and educational study. It will engage communities. It will involve, schools, local authorities, private sector organisations, Friends of Parks groups, wildlife organisations, other voluntary and community groups in a common endeavour to create a continuous green corridor. Trees and woodland are an important element of Barnet and need protection. Their importance and the proposal for a Great North Road Hedge needs to be emphasised and the case made at examination.
Clarion Housing Group and the Huntingdon Foundation	CDH07	Para 6.21.3 of the supporting text of the Policy states “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 part of the Local Plan is not sound in the context of NPPF (2021) Para 35 as it is not measurable or effective; “where site constraints make it difficult to provide private outdoor open space that offers good amenity for all units” is considered to be too vague and unimplementable. The wording should be adjusted to give a clear and measurable metric. Further, the Para also states “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” (emphasis added). It is not considered justified to require a financial contribution in if policy compliant levels of playspace are provided as part of an application. This para needs to be modified to be considered sound. Policy CDH07 part iii. requires development proposals to provide a biodiversity net gain of “at least 10%” either within the development site or off site. This is not justified in the context of the Local Plan evidence base and is not consistent with National Policy. Para 6.22.4 of the supporting text is incorrect in stating that this figure is required by the NPPF and London Plan. The footnote on page 386 states that this requirement is

Representor	Section	Summary of Comments
		<p>“subject to the enactment of the environment bill”, and as there is no guarantee of the bill coming into law, the Policy cannot enforce this requirement and is unsound. The wording of Para 6.21.3 should be adjusted as follows: <i>“...In tall buildings which fail to meet the external private amenity space standards, where site constraints make it difficult to provide private outdoor open space that offers good amenity for all units, additional internal living space...”</i></p> <p><i>“...residential development in areas of playspace deficiency as well as those in areas with sufficient playspace which do not provide a policy compliant level of playspace on site will normally be expected to make a contribution either on site or financially for playspace...”</i> In order to be consistent with the requirements of the London Plan, Part iii. Of Draft Policy CDH07 should be adjusted as follows: <i>“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”</i></p>
Oakfield House, Burtonhole Lane, Mill Hill	CDH08	<p>The policy advises “Conservation area character appraisals and where applicable, conservation area-based design guidance will be used in the assessment of planning applications.” As demonstrated above, the Mill Hill Conservation Area Appraisal is a 2008 document and does not have regard to the negative impact development has already had on the character and appearance of this heritage asset. Many other appraisals are of a similar age. To ensure developments are assessed against an accurate baseline, the Local Planning Authority should commit to and commence a review and update of all Appraisals to ensure applications are appropriately assessed. We trust this assists in enabling the emerging Plan to evolve with sensible suggestions as to how it can be amended to be considered sound.</p>
Historic England	CDH08	<p>We note and welcome the expansion of the supporting text (now paras 6.23.1-6.33.1) to policy CDH08, and consider this sets out a helpful understanding of the borough’s current position in relation to the historic environment. We further note the significant changes to policy CDH08 itself and the introduction of separate sections relating to different types of heritage asset. Taken individually, including the opening para, we do not consider that there is anything that we would disagree within CDH08 although we would question the level of repetition of national policy and whether this adds value to the local plan. However, we would suggest that the policy as a whole could be made more straightforward through the removal of the first two overarching paras, which in effect repeat text elsewhere.</p>
Brad Blitz	CDH08	<p>The Draft Local Plan Reg 19 Cites makes several reference to heritage assets within Barnet and the need for sensitive development. Specifically it cites Policy CDH08 Barnet’s Heritage as one basis for the proposed developments in Hendon- one of the proposed district town centres. Policy GSS08 Barnet’s District Town Centres as one basis for the proposed developments in Hendon – one of the proposed town centres . The Draft Local Plan Reg 19 states: “Applicant will need to balance any harm caused to heritage assets against the wider sustainability benefits in consultation the conservation and design team”. p121 and 6.3.1 “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 Barnet’s historic environment. The historic environment is reflected in the designation of 16 conservation areas, the majority of which are supported be conservation area character appraisals” p136. And 6.24.1 “The Council will not permit harm to a designated heritage asset unless public benefits, which can include heritage benefits, of the proposal outweigh the harm p136. Also the Good Growth policies of the London Plan emphasise the need to protect character and heritage. “London’s distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special feature that Londoners value about a place, such as cultural, historic or natural elements, can be used positively to guide and stimulate growth, and create distinctive, attractive, ad cherished places” (see 1.2.7). The proposals included in the draft Local Plan Reg 19 SPD Design Guide (adopted July 20 2021) and the Hendon Hub, by virtue of their size, scale, and density pose major threats to the character and heritage of the area, as outlined in the 2011 and 2012 Character Appraisals for The Burroughs and Church End. The importance of the heritage assets included within the areas proposed for development has been further recognised by Historic England in two letters submitted to the Council on 22 February 2021 and 19 July 2021 where the heritage body identifies significant harm resulting from the proposed developments in the two conservation areas, including the proposed alterations to the Hendon Library, and the erection of unsympathetic buildings on the Burroughs and more importantly, the overdevelopment of buildings on Church End, overlooking the ancient church. There has been tremendous public opposition to the proposed development in the above conservation areas and particularly with respect to the heritage assets on the Burroughs (the Library) and around Church End. This includes two petitions which included some 2000 signatories in total and formal objections raised by letter and in Council meetings. The proposed developments provide no public benefit to residents, as emphasised be 2000 objectors. With respect to Hendon, the Local Plan Reg. 19 should be modified to:</p> <p>Protect the Burroughs and Church End conservation areas from unsympathetic development, by reducing the scale, size, and massing of the proposed new student accommodation/residential homes in this highly residential area. The number of student living spaces (1700) needs to be sharply reduced and new dorms should be built on Middlesex University’s footprint. In line with the recommendations by Historic England, the Local Plan should recognise the importance of heritage assets and:</p> <p>Reject proposals to alter the listed Hendon Library Building, including both the exterior, interior and roof.</p>

Representor	Section	Summary of Comments
		<p>Reject proposals to build within 50 metres of St. Mary's Church Remove the proposed demolition of 3 Egerton Gardens from the plans for Hendon Remove the proposed demolition of 28-30 Church End from the plans for Hendon Reject proposals to develop the Burroughs Car Park and Burroughs Gardens Car Park which are used by residents of the 18th and 19th Century listed buildings on the Burroughs and which protect these historic sites. Without parking, families will not be able to remain; and properties risk becoming HMOs – a trend which has seen two mid-18th Century brick and timber buildings destroyed, as developers ripped out beams and walls.</p>
Hill Residential Ltd & Trustees of The Gwyneth Will Trust & Trustees of The Gwyneth Cowing 1968 Settlement	CDH08	Supportive the overall thrust of proposed Policy CDH08 which is reflective of the relevant statute and NPPF and PPG. This includes including NPPF para 202 where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
KRF Services, 45 Winnington Rd N2	CDH08	Supporting para (6.25.4) notes the following: “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.” In relation to conservation areas, Policy CDH08 notes the following: “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...” As drafted, the wording of this policy is not clear in what it is directing the decision maker to do, when such a proposal is submitted as part of a planning application. It suggests through the wording “will be resisted” that there is a policy objection to demolishing buildings, which are considered to make a positive contribution to the character or appearance of a conservation area. In terms of plan-making, para 16 (part d) of the NPPF states that plans should “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”. As drafted, Policy CDH08, is inconsistent with this guidance. The wording of the policy indicates that the Council’s starting policy position is to resist demolition of buildings that are considered to make a positive contribution to the character or appearance of a conservation area per se. However, to the contrary, the loss of a positive building in a conservation area can be considered acceptable, providing that any replacement building preserves, or enhances, the character and appearance of that conservation area. The Legislation governing listed buildings and conservation areas is the Planning (Listed Building and Conservation Areas) Act 1990. Notably, Section 72 (1) of the Act requires the decision maker with respect to any buildings or other land in a conservation area to pay “special attention...to the desirability of preserving or enhancing the character and appearance of that area”. To preserve, in this context, means to cause no harm. There have been some significant recent judgements and determinations which have helped to clarify the appropriate mechanisms contained within the NPPF for the determination of heritage-based planning applications. Most notably these have included Bramshill -v- SSHCLG [2021] EWCA Civ 320 and the called-in decision on the ‘Whitechapel Bell Foundry’ (appeal refs. APP/E5900/V/20/3245430 & APP/E5900/V/20/3245432). In para 12.76 of the called-in decision on the ‘Whitechapel Bell Foundry’, the interaction between paras 193 and 196 of the NPPF, the so called ‘internal balance’, was considered. This para stated the following: “In terms of the Framework, the significance of the designated heritage asset would be conserved, and the proposals would accord with the requirements of paras 184 and 193. In this scenario, there is no need to consider paras 195 or 196 because considered in the round, the proposals would cause no harm to the significance of the designated heritage asset affected.” This judgement by the Planning Inspectorate was endorsed in their decision by the Secretary of State in para 23 of their decision, where they stated the following: “The Secretary of State agrees with the Inspector at IR12.76-12.77 that the proposals would accord with the requirement of Framework paras 184 and 193, and in this scenario, there is no need to consider Framework paras 195 or 196 because considered in the round, the proposals cause no harm to

Representor	Section	Summary of Comments
		<p>the significance of the designated heritage asset affected.” A similar issue was considered in the Court of Appeal’s Bramshill judgement which addresses the interpretation and application of policies in the NPPF and the assessment of harm and benefit to heritage assets. In this judgement, it was outlined in para 74 that there is no one approach that is suitable for considering the approach to paras 195 and 196 of the NPPF. Notably, Para 74 of the judgement specifically addressed this point: “The same can be said of the policies in paras 195 and 196 of the NPPF, which refer to the concepts of “substantial harm” and “less than substantial harm” to a “designated heritage asset”. What amounts to “substantial harm” or “less than substantial harm” in a particular case will always depend on the circumstances. Whether there will be such “harm”, and, if so, whether it will be “substantial”, are matters of fact and planning judgment. The NPPF does not direct the decision-maker to adopt any specific approach to identifying “harm” or gauging its extent. It distinguishes the approach required in cases of “substantial harm ... (or total loss of significance ...)” (para 195) from that required in cases of “less than substantial harm” (para 196). But the decision-maker is not told how to assess what the “harm” to the heritage asset will be, or what should be taken into account in that exercise or excluded. The policy is in general terms. There is no one approach, suitable for every proposal affecting a “designated heritage asset” or its setting.” These decisions also consistent with the judgement in Bohm -v- Secretary of State for Communities and Local Government [2017] EWHC 3217 (Admin), which clearly held that, the loss of a positive building from a Conservation Area would meet the duty under S72 of the PLBCAA 1990, should the replacement building preserve or enhance the character and appearance of the conservation area. The position in ‘Bohm’ has been routinely endorsed and the demolition of non-designated heritage assets considered acceptable, due to the quality of the replacement building. Given the judgement in Bohm (specifically at para 33), when considering the impact of the proposal on the CA under s.72, it is the impact of the entire proposal which is in issue. Therefore, the decision maker must consider not merely the removal of the building which made a positive contribution, but also the impact on the CA of the building proposed to replace it. On this basis, we suggest that in order to ensure that the Local Plan is consistent with Para 16 and Section 72 (1) of the Planning (Listed Building and Conservation Areas) Act 1990, we advise a modification to the wording of draft Policy CDH08, which should be amended to read as follows: “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 of 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 unless the proposals preserve or enhance the character and appearance of the conservation area”</p>
British Sign and Graphics Association	CDH09	<p>We therefore suggest that, in policy CDH09, para (d) – (you may like to consider renumbering and realigning this policy text and consistency in upper and lower cases – for example, para (d) is aligned as a subpara of (a)!) – be deleted. The advice is more relevant to the section on public realm and reducing street clutter rather than on any advertisement which may utilise existing street furniture. We further suggest that the final unnumbered para “The Council will resistexcept in exceptional circumstances” also be deleted for the reason we give above.</p>
FORAB	CHD04	<p>This policy merely reflects the current policy which applies across the Borough defining a tall building as one over seven storeys. The current policy identifies areas where tall buildings would be acceptable, and indeed these are extensive, but even so the policy has evidently failed as we have experience approval of tall building in areas not previously identified. Many areas of the Borough are explicitly low rise, where anything over four storeys would be a significant visual incursion. But by implication a seven storey building, not being defined as ‘tall’, may be acceptable. ‘Tall’ buildings that vary from the prevailing landscape have engendered strong resistance. The London Plan points the way by offering far more flexibility that hitherto, recognising that different heights could be appropriate for different localities taking account of the local context. A different and more nuanced approach is needed, in particular recognising the flexibility offered by the London Plan. All areas of the Borough should be assessed to determine the prevailing height and an upper limit set for each area. This could vary from 4 storeys to no upper limit. Most areas of the Borough are consistent in terms of prevailing height and we do not anticipate this would be a difficult exercise.</p>
Finchley Society	CHD07	<p>There is much to commend in Chapter 10 of the draft Plan, but there are places where it could and should be strengthened. Gardens are important for biodiversity. In the Regulation 18 consultation the Finchley Society requested a further subpara (d) to read “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 refused, saying that it had no plans to make an Article 4 Direction, but did not explain its refusal or address the merits of the proposal. Add subpara (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.” Because there ought to be a full discussion of Chapter 10 and I wish to make important points about front gardens, which continue to be lost in Finchley.</p>
Finchley Society	CHD07 (a iii)	<p>Para (a iii) envisages a contribution to off-site provision where amenity space in a new development is inadequate. Unless the off-site provision is new or enhanced such a contribution merely helps the Council’s maintenance budget, does not improve the amenity space available to the dwellers in the new development and does not therefore meet the purpose of the policy. Add a sentence reading “mere contributions to the maintenance of existing parks will not satisfy this policy” Because parks and open spaces are fundamental to the future of Barnet, and will probably be an important topic at the EiP. Financing their improvement is crucial.</p>

Representor	Section	Summary of Comments
London Historic Parks and Gardens Trust	CHD08	<p>The Local Plan leaves non-designated designed landscapes of heritage value unprotected from the impacts of development either within the open space or, arising from development outside. Such impacts could be on designed views into, as well as from, the landscape and setting, their landscape character and defined significance. The most effective way of identifying these sites is via the Local List. Indeed, this is the approach that Historic England has advised since its 2016 publication, updated 2021. https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/</p> <p>Local Heritage Listing: Identifying and Conserving Local Heritage, Historic England Advice Note 7 (2nd edition), Published 27 January 2021 “Local heritage lists are one way in which local heritage – buildings, monuments, sites, places, areas, historic parks and gardens or other designed landscapes – can be formally identified, as part of the wider range of designation, so that their significance can be taken into account in planning applications affecting the building or site or its setting.” In August 2019 Barnet held a Local Heritage List consultation. We pointed out the discrepancy between the HE advice and the Barnet local list criteria relating only to buildings and structures. HE defines “Cultural landscapes: heritage assets associated with a significant period in an area’s history, including historic parks, gardens, grounds and their structures and other designed landscapes.” The Senior Planning Officer for Urban Design and Heritage replied to us on 2 Sept 2019 stating: “<i>The decision was made to exclude parks, gardens and other open spaces from the asset types that could be nominated for local listing. It was felt there were sufficient policies and protection elsewhere in the Local Plan.</i>”</p> <p>Since then the new Local Plan has been drafted. There has been time to ensure the new local plan policies would ensure protection of designed landscapes from any adverse impacts of development. The current draft excludes landscapes. Developers are likely to argue that this is a deliberate omission rather than a careless oversight. This leaves cultural landscapes, as defined by HE unrecognised and therefore unprotected in Barnet. The general Parks and open spaces policies do not give protection to that subset of designed landscapes from development outside their boundaries eg Policy ECC04. So this is a threat to all Barnet’s open spaces.</p> <p>Evidence base. The London Historic Parks and Gardens Trust launched the London Inventory of Historic Green Spaces in April 2003. The research was completed over a seven-year period and it continues to be added to and updated. The Inventory is a comprehensive listing of more than 2,500 historic open green spaces - parks, gardens, squares, churchyards, cemeteries, commons and greens - in the Greater London Boroughs, and contains valuable information on each site. We link our information wherever possible with other resources including GoParks London and the Greater London Historic Environment Record to make sure that the vital historic features of London’s green spaces is protected within the planning system. The Barnet List Detailed information on each of the 101 sites in Barnet can be accessed here: https://londongardenstrust.org/conservation/inventory/sites-in-borough/?Borough=Barnet</p> <p>A few of these sites of heritage interest are associated with buildings or structures which may already be recognised by Barnet as locally listed buildings. Our view is that these sites are valuable on their own merits and should be designated as protected landscapes. Their status as a setting of a designated building or structure does not recognise their full heritage and cultural value.</p>
London Historic Parks and Gardens Trust	CHD08	<p>Insert “designed landscapes” after locally listed buildings in 1st clause.</p> <p>Insert “and designed landscapes” after Locally Listed Buildings and their settings in the clause headed Locally Listed Buildings and Other Non-Designated Heritage Assets Insert - Development proposals affecting heritage assets such as designed landscapes should</p> <ul style="list-style-type: none"> • protect and conserve the borough’s heritage assets of designed landscapes such as parks, gardens, squares, churchyards, cemeteries and other sites of historic interest; • give proper recognition and consideration of designed landscapes and open spaces, and evidence that their status and significance has been given due consideration in the consideration of planning applications including details such as lighting, noise, intrusion, overlooking, overshadowing, boundaries, change of use, temporary uses/reinstatement. In our experience, these impacts are often not thought of at planning application stage. • Provide landscape improvements to mitigate adverse impacts on the experience of being within the open space arising from the development. <p>We are sorry that we have had to make this response at this late stage. <i>London Parks and Gardens Trust</i> responded to Barnet Draft Growth Strategy 2030 Consultation in August 2019. I have checked through our records and I can confirm that we were not consulted on the Reg 18 draft Local Plan. London Historic Parks and Gardens Trust trades as <i>The London Gardens Trust</i> (previously <i>London Parks and Gardens Trust</i>). The London Historic Parks and Gardens Trust is a registered charity, affiliated to the national Gardens Trust (GT) a statutory consultee for planning applications. We champion all London green space and make observations on planning proposals, both on behalf of the GT for sites on the Historic England Register of Parks and Gardens of Special Historic Interest, and also in relation to other green open spaces, especially those in our Inventory https://londongardenstrust.org/conservation/inventory/</p>
Brent Cross South Limited	Chapter 7	<p>The Draft Local Plan acknowledges the impact of COVID-19 on town centres and the shift from retail to other formats, but is not explicit about the fact that many restaurants and food businesses have pivoted towards a more production-led/takeaway model. Whilst restaurants are likely to return to normal trading as COVID-19 recedes, it is likely that some will retain a production and delivery operation model alongside dine-in, which in turn means that delivery</p>

Representor	Section	Summary of Comments
Partnership ('BXS LP'),		companies such as Deliveroo and Uber Eats are also likely to play a role in the future of our high streets. It is considered that the Plan should consider how public realm and building design could be adapted and implemented to facilitate these new models. The Plan refers to culture and tourism as a part of night-time economy, but is generally very light on culture. The Plan should also refer to the Mayor's Rescue Plan for Live Music Venues and express support for such uses in suitable locations, given their decline across London.
Finchley Society	Chapter 7	Nowhere in Chapter 7 is Friern Retail park mentioned. Yet it is a significant magnet for car-borne shoppers in Finchley, and a proper analysis of shopping must include it in the hierarchy. It is more significant than many local parades of shops Include Friern Retail Park in the discussion in Chapter 7 and in Table 13.
Queer The Norm Ltd and Inkluder CIC	Section 7.6	We believe the lack of direct inclusion of LGBTQ+ provisions within the description does not commit to co-operating with the LGBTQ+ community within Barnet and should be specific for it to be legally sound. Inkluder CIC is the first LGBTQ+ led community organisation in the borough and was founded in March this year and plans on tackling every single element in the 7.6 Vibrant Towns section. We have many plans on how Barnet can become a more vibrant and desirable a place to visit, work and live including inclusive works of art at the entrance of all the train stations as they are the most common way people step into barnet for the first time. 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 with a dedicated space to support LGBTQ+ arts, culture and events. 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.
Brent Cross South Limited Partnership ('BXS LP'),	Para 7.5.1	As per the above, this para should be amended as follows: <i>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 at Brent Cross North and Brent Cross Town, with 56,600m² of comparison retail floorspace; approximately 7,500 new homes, including affordable ones, and 395,000m² of new office space new commercial quarter with a forecast of over 20,000 new jobs.</i>
TFL (Spatial Planning)	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. We therefore welcome the addition of a reference to consider opportunities to reduce on-street and off-street car parking as part of town centre development. However, we would question the accompanying caveat 'whilst acknowledging the contribution of appropriate car-parking facilities to the success of a town centre'. Most town centres in London do not rely on car parking for their success because people using active travel or public transport spend both more money time in the town centre. They are also more frequent visitors. On the contrary, reducing the dominance of vehicles has been shown to support town centre vitality by making the public realm more pleasant and inclusive, thus encouraging more frequent and longer trips.
CPRE London	TOW01	We support improvement of public realm and planning around sustainable transport. This policy should state explicitly that that town centre policy is underpinned by reducing car dominance in the town centre; and promoting sustainable travel to / from the town centre. Promotion of health and wellbeing – the starting point for this needs to be underpinned and linked to transport policy i.e. to support active travel and modeshift away from cars as this is one of the most important ways to promote active lifestyles, key to health and wellbeing.
Barnet Cycling Campaign	TOW01	This 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 has increased and trade has increased, as shown in this reportv and this videovi.
Landsec	TOW01	Landsec supports the Council's aspirations to promote the vitality and viability of the Borough's town centre. However, Part D requires a sequential and impact assessment for replacement/re-provision of main town centre uses in out of centre locations. Landsec continue to request the policy and supporting test be amended to confirm that established locations are not required to undertake a sequential and impact assessment if there is no net uplift of on-site main town centre uses.
FORAB	TOW01 TOW02	We are fully supportive of policies TOW01/02 but the drafting does not reflect the reality of the contraction of retail recent changes to classifications (the majority of commercial properties now in Class E). The introduction of Permitted Development allowing the conversion of shops to residential use may hasten the loss of retail outlets. TWO1(b) for example is very robust on defending local parades from changes to other uses, but such losses have occurred over recent years and Permitted Development is likely to accelerate this. These issues are mentioned in the accompanying text but are not reflected in the two policies. To be sound these two policies should be redrafted to reflect the reality of the decline in retail and the possibility of many outlets undergoing change of use. If the aspirations in the policies are to be sustained there needs to be reference to more robust protection such as using Article 4 Direction wherever possible.

Representor	Section	Summary of Comments
Hammerson UK Prop and Aberdeen Standard Investments	TOW01	Policy TOW01 deals with vibrant town centres and in respect of Brent Cross refers to Policy GSS02 but also states “Brent Cross [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 new Metropolitan Town Centre for North London.” As described above and consistent with the NPPF, the wording should expressly refer to residential accommodation forming part of the mix of uses provided.
DTZ Investors UK Ltd	TOW01	TOW01 seeks to 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 policy supports an appropriate mix of uses in Brent Cross, Edgware, Cricklewood, District Town Centres and Local Centres. It also seeks to enhance and protect local parades outside of town centres. The draft policy wording requires a town centres first approach to be applied, with proposals for main town centre uses outside of town centres being subject to the sequential test. The policy also requires any proposal of more than 500sqm of retail, office or leisure development in an edge or out of centre location to be supported by an impact assessment. We recommend that existing retail parks in accessible locations are acknowledged as sequentially preferable sites for main town centre uses. Sites such as this already accommodate retail and other main town centre uses and, therefore, they represent a sustainable location for further development. The policy also fails to acknowledge that the sequential test should be proportionate to the scale and nature of a proposal. Furthermore, the proposed threshold of 500sqm is significantly below the national threshold of 2,500sqm as set out in para 90 the NPPF. There is no justification for the proposed lower retail impact threshold as the Council does not have an up to date retail study (the most recent document is the Town Centre Floorspace Needs Assessment (2017)), and we consider that, as proposed, this would have a detrimental impact on the delivery of development. This does not represent a positive approach to retail development. The current wording of draft Policy TOW01 is unsound as it is not positively prepared, justified or consistent with the NPPF. We therefore propose that the following amendments are made: <i>(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. After centres and edge-of-centre sites the sequential approach should prioritise existing retail parks in accessible locations (including Friern Bridge Retail Park) as sequentially preferable sites for main town centre uses. The application of the sequential test must be proportionate and appropriate for the scale and nature of the given proposal. In addition, any proposal of more than 2,500 m² of retail, office or leisure development in an edge or out of centre location must be supported by an impact assessment.</i>
Brent Cross South Limited Partnership (‘BXS LP’),	TOW01	The reference to Brent Cross in Part (a) should be Brent Cross Growth Area; it is considered the policy should be amended as follows: <i>The Council will support an appropriate mix of uses within designated centres:</i> <i>i) <u>The redevelopment of Brent Cross Growth Area (see policy GSS02) to will 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.</u></i>
Finchley Society	TOW01, TOW02 and ECY01	All these policies are good, but cannot be deemed sound unless there are the means to implement them. Use Class E and the permitted development rights conveyed by the recent amendments to the Town and Country Planning (General Permitted Development) (England) Order 2015 limit the Council’s powers considerably, and para 53 of the NPPF 2021 restricts the Council’s use of Article 4 Directions to maintain control. To be sound, the Plan must set out a strategy for implementing the policies in TOW01, TOW02 and ECY01. The Council must devise and set out a strategy for implementing these policies in the context of the new Permitted Development rights and para 53 of the NPPF The implementation of town centre policies in current circumstances needs full discussion at the EiP, preferably with some knowledge of how other London boroughs are coping.
Home Builders Federation	TOW02	The permitted development right for Class E allows a change of use from any operation, or mix of operations, within the commercial, business and service use class (Class E) to residential use (C3). Part (h) of the policy is unsound because it conflicts with national policy and regulations. The new PDR applies to buildings which have been vacant for at least three continuous months immediately prior to the date of the application for prior approval. This requirement was introduced to protect existing business in the premises. It does not, however, require a building to be empty for at least 12 months, as the Council’s policy specifies. The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021, Part 6, Development Not Permitted, MA.1 (a). It is unlawful for the Council to require this. If the Council is going to refer to a vacancy period it should be the period of three months in the regulations, although this is not strictly necessary, as this is a matter of law rather than policy. Nor is there any requirement in national policy for evidence of continuous marketing over a 12-month period. This also should be deleted. The cumulative effect of these criteria for prior approval would limit the potential effectiveness of the changes to permitted development rights to encourage new sources of housing supply. Moreover, given the shortages in housing supply in London compared to need, these restrictions are doubly unjustified.

Representor	Section	Summary of Comments
Barnet Cycling Campaign	TOW02	As recommended above, we suggest converting some unused retail units for use as cycle hubs.
Barnet Liberal Democrats	TOW03	<p>1. We believe that this policy should reference, and be in accordance with, Barnet's Joint Health and Wellbeing Strategy.</p> <p>2. Under b) (xii) we would add impact on crime and antisocial behaviour</p> <p>Modifications:</p> <p>1. We believe that this policy should reference, and be in accordance with, Barnet's Joint Health and Wellbeing Strategy.</p> <p>Under b) (xii) we would add impact on crime and antisocial behaviour</p>
Thames Water Utilities Ltd	TOW03	To further strengthen Policy TW03 Thames Water would suggest that the installation of fat traps is mandatory to prevent blockages and protect Thames Water's assets within the Borough.
Brent Cross South Limited Partnership ('BXS LP'),	Table 13	The new town centre will be both north and south of the A406 (Brent Cross North and Brent Cross Town), and this should be noted in Table 13. We also suggest that the reference to 'Brent Cross Shopping Centre' in the top row of the table is amended to 'Brent Cross'.
Peter Piper	Para 8.17.2	Under 8.17 <u>Promoting Health and Wellbeing</u> I propose inserting: "The impacts of air pollutants will be mitigated in accordance with ECC02 and as set out in Barnet's Air Quality Strategy."
Brent Cross South Limited Partnership ('BXS LP'),	Para 8.2.2	Given their high transport accessibility, Growth Areas are also suitable locations for community uses. It is therefore suggested that 'Growth Areas' should be added to the list of locations where community uses will be encouraged, as follows: <i>The Council's approach is to encourage new community uses to be located in <u>Growth Areas</u>, town centres and local centres as these locations tend to be more accessible by public transport, in particular the bus network.</i>
Roger Chapman Ramblers Herts & North Middlesex	Paras 8.5.4; 10.15.4, 10.19.7	The plan appears to give increasing (and indeed extremely welcome) preference to active travel modes but does not go far enough in providing the tools that will enable Developers, planners and local residents, to clearly, easily and simply understand what could be achievable. Within the plan are references that hint at an understanding of the issue e.g. para 8.5.4 "A key conclusion of the <i>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.</i> " 10.15.4 "Public accessibility is also important and the ability to link into the wider network of footpaths and cycleways should be considered." 10.19.7 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. <i>The Dollis Valley Green Walk and the Capital Ring are strategic walking routes that cross Barnet.</i>
McCarthy and Stone Retirement Lifestyles and Churchill Retirement Living	CHW 02	We welcome the Council's commitment to the health and wellbeing of its residents. As detailed in our representation to Policy HOU04 – Specialist Housing, the demographic profile of the Borough is ageing with a requirement for 275 units of specialist older persons' accommodation per annum. An ageing population inevitably results in an increase in frail individuals and persons with long term health issues. There is a commensurate pressure on care and health services accordingly with many local authorities spending over a third of their budgets on adult social care currently. It is well established that poor housing can exacerbate health problems in old age, with enormous resultant costs to the NHS and social care. For example: Falls - Public Health England statistics show that in 2017/18 falls accounted for 335,000 hospital admissions in England of people aged 65 and over. Cold Homes - Millions of older people in the UK are living in homes that are too cold. A cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression. Social Isolation - 1.5 million people aged 50 and over are always or often lonely, researchers have calculated. Loneliness makes it harder for people to regulate behaviours such as drinking, smoking, and over-eating, which in turn have their own significant negative outcomes. Specialist older persons' housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and companionship. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. The Council's aspirations to improve the health and wellbeing of its residents is commendable and we are strongly of the view that increasing the delivery of specialist older persons' housing is wholly aligned with this objective. We recommend that the role of specialist older persons' housing in improving the health and wellbeing of the Borough's elderly residents is acknowledged in the wording of this policy. As a suggestion we would recommend an additional sub-clause to the policy which reads as follows: <i>i <u>Ensure that the needs of the Borough's ageing population are addressed, and that older people have increased access to support, care, companionship, and appropriate accommodation.</u></i>

Representor	Section	Summary of Comments
Queen Elizabeth's School	CHW01	<p>Queen Elizabeth's School ("the School") is a leading boys' grammar school located in Queens Road, Chipping Barnet. The School was founded by Queen Elizabeth I's royal charter in 1573 and has operated from its Queens Road campus since 1932. The campus (Figures 1 and 2) comprises a main academic hub with a compact arrangement of buildings in the centre of the site between two large playing fields. The campus has no planning designations in either the adopted or emerging Barnet Local Plans. The School also own a sports field to the east of Galley Lane which is used for overspill curriculum sport. The School is an established local provider of education and employment to residents of Barnet and surrounding areas. It consistently ranks amongst the highest performing schools across state and independent sectors for academic results and pupil progress. The School's strong academic curriculum is complemented by an extensive enrichment programme. High quality teaching, sports, pastoral and administration facilities that can adapt to meet the School's evolving needs are vital for supporting Queen Elizabeth's School's ongoing success. Local plans must be consistent with national planning policy. With respect to schools, the NPPF ("NPPF") (July 2021) recognises the importance of planning for schools to help meet community needs. Para 95 states: "It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: (a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and (b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted." (Emphasis added). It is within this context that these representations are made. In summary, the School supports the Regulation 19 Plan in principle, but wishes to raise points relating to the "soundness" of the Plan in line with para 35 of the NPPF. The Plan's prioritisation of social infrastructure provision, and specifically of school facilities, is supported. In the following paras, we suggest some amendments that seek to ensure the plan robustly supports the provision and expansion of school facilities. We consider the draft policy does not offer the same level of support for development at schools to correspond with para 95 of the NPPF. In particular, part i) of the policy lacks specificity as to how educational providers will be supported. It is recommended that this part of the policy is expanded to include the red text below, to read: <i>"The Council will: i) Support providers and promoters of new and improved educational facilities within the Borough, such as those at Middlesex University's Hendon campus, by affording great weight in planning decisions to the need to create, expand or alter these facilities, and will encourage the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research."</i> Para 95 of the NPPF also encourages local authorities to take a proactive, positive and collaborative approach to working with school promoters, both with regard to pre-application discussions and planning decisions for development at school sites. This is not currently reflected in draft Policy CHW01 and we propose that a subsection is added to the policy to establish this objective, for example: "The Council will adopt a proactive, positive and collaborative approach to working with school promoters through pre-application discussions and planning applications to support the delivery of new and expanded educational facilities." Incorporating these recommendations into the draft Plan will assist with delivering educational facilities in a timely manner to sustain the supply of school places, thereby accommodating predicted population growth and supporting Barnet's planned housing targets. High quality, flexible and well-designed facilities are vital for the academic success of educational institutions such as Queen Elizabeth's School. Revising the Regulation 19 plan to adopt a more proactive approach to planning for schools will help Barnet's educational establishments respond to evolving academic, sporting and pastoral needs and trends. Our recommendations are entirely consistent with national planning policy and recent legislation¹ that seeks to prioritise and 'fast track' planning applications for school development proposals and extend permitted development rights for school buildings.</p>
Barnet Cycling Campaign	CHW01	<p>The Indoor Sport and Recreation study identified a 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 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.</p>
Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	CHW01	<p>Fully supportive of the Publication Local Plan of ensuring that community facilities are provided for Barnet's communities.</p>
Landsec	CHW01	<p>Landsec supports this draft Policy as currently worded which enables the enhancement of community infrastructure, such as the Lido located to GNLP, whilst also providing sufficient flexibility to provide a replacement facility, of better quality, off site. This approach will allow for appropriate development to come</p>

Representor	Section	Summary of Comments
		forward in the right places to meet the needs of the Borough and demands of the market. This Draft Policy is considered to be consistent with both national policy and the London Plan Policy S1.
Barnet Liberal Democrats	CHW01	<ol style="list-style-type: none"> 1. Whilst clarity on the position of registration as an asset of community value is useful, this policy is significantly less clear than previously. In particular, it no longer sets out an objective test that a facility is no longer required. It would be helpful to both residents and developers to have clarity on this. There is no justification for removing it. 2. There is no objective test of what it means to support and promote an alternative use. Again, clarity on this would be helpful. 3. These points are particularly true given that there may be a conflict of interest for planning departments who both have a duty to assess ongoing need, but also have a duty to maximise CIL income to the council. In order for there to be a perception of fairness on all sides, objective tests and clarity here are important. <p>Modifications: Include within the policy an objective test of when a community facility or asset is no longer necessary to the local community.</p>
Sports England	CHW01	Sport England considers that Policy CHW01 does broadly follow Sport England's Policy and the NPPF however it does not consider that it is fully compliant with national policy as currently drafted as the policy seeks: "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..." The NPPF, para 99, seeks replacement facilities to be of at least equivalent quality, quantity and in a suitable location. The policy lacks the requirement for at least equivalent quantity and location required by the NPPF therefore Sport England does not consider this element to align with national policy Sport England is also unclear if playing fields and outdoor sports facilities are applicable to Policy CHW01. These facilities are mentioned at the beginning of the Chapter but are not raised at any other stage in relation to this policy. Sport England considers these community facilities and applicable under Policy CHW01 but it is not clear whether the Council recognise this or not.
Sports England	CHW01	Sport England support the inclusion of this policy and its content. Improving health and well-being is a theme throughout the whole document and it is welcomed that this is highlighted by a specific policy. Sport England also welcome the inclusion of Active Design within Policy CHW02 to help achieve the Council's health and wellbeing aspirations. Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice therefore seeking developers to consider the Active Design Principles within proposals would assist the Council to achieve its health and wellbeing aims.
Brent Cross South Limited Partnership ('BXS LP'),	CHW01	As above, Part C should be amended as follows: <i>The Council will:</i> <ol style="list-style-type: none"> a) 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 <u>and Growth Areas</u> will need robust justification;
NHS Property Services	CHW01	We support the provision of health services in the borough, and welcome LBB's commitment to providing appropriate health provision. However, Policy CHW01 fails to address the need for flexibility within the NHS estate. NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of superfluous and unsuitable healthcare facilities for best value can be prevented or delayed. The policy currently fails to take into account that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services where it can be demonstrated that community facilities would be lost or have their use changed as part of a wider NHS estate reorganisation programme. Having met the NHS testing and approval processes before being declared surplus, it should be accepted that this provides sufficient evidence that a facility is neither needed nor viable for its current use or other community uses and that adequate facilities, which meet the needs of the local population, are or will be made available. An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that NHS sites are not strategically constrained by restrictive local planning policies. Where such restrictive policies are in place, the reorganisation of underutilised facilities can be delayed. In turn, there are direct implications for the provision of quality healthcare facilities and services, as the reinvestment of capital in modern and fit-for-purpose facilities is prevented or delayed, with ongoing revenue spent on maintaining inefficient parts of the estate. To confirm, a property can only be released for disposal or alternative use by NHSPS once Commissioners have confirmed that it is no longer required for the delivery of NHS services. Furthermore, NHSPS estate code requires that any property to be disposed of is first listed on "e-PIMS", the central database of Government Central Civil Estate properties and land, which allows other public sector bodies to consider their potential use for it. Where NHS Commissioners can demonstrate that healthcare facilities are in need of reorganisation, which might include the disposal or development of a facility, there should be a presumption that such sites have been subject to appropriate scrutiny both by NHS service providers, and wider

Representor	Section	Summary of Comments
		<p>public sector bodies, and as a result are suitable for other uses. Site which are declared surplus to NHS needs should therefore not be subject to restrictive policies. With this in mind, we are keen to encourage that a greater level of flexibility be granted to the NHS via modification of the wording of policies that ensure that we are able to promptly and efficiently respond to the needs of the population as they arise . The NPPF states that Local Plans by nature to adopt policies that “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community” (Para 93b). We would suggest the inclusion of additional wording (in blue italics) be included in Policy CHW01 to make this policy more robust: “Development (including change of use) that involves the loss or replacement of existing community facilities/services will only be permitted if:</p> <ul style="list-style-type: none"> - 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 , or - the loss or partial loss of a facility or site arises from a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities.” This change would ensure that the NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met. This amendment to policy wording would also be in accordance with London Plan Policy S1(F2).
Clarion Housing Group and the Huntingdon Foundation	CHW01	<p>Although Clarion Housing Group and the Huntingdon Foundation support Draft Policy CHW01 in principle and the value of community facilities and services further flexibility is required to ensure it does not unnecessarily inhibit development coming forward where this not a genuine need to retain the existing facility. Draft Policy CHW01 is considered unsound in regard to NPPF (2021) Para 35 on the basis it is not effective and unnecessarily inhibits sustainable development being delivered. Redevelopment (including change of use) that involves the loss or replacement of existing community facilities / services needs to be considered in regard to site-specific circumstances and on a case-by-case basis. In some cases redevelopment proposals that result in a loss of a community facilities may deliver other substantive public benefits that outweigh the loss of the facility such as the provision of much-needed housing (including affordable), provision of new employment floorspace and jobs delivering local economic benefits, improvements to public realm and the townscape. Draft Policy CHW01 should also recognise the potential for replacement community facilities to be incorporated into mixed use residential schemes where a genuine community need is being met. Draft Policy CHW01 should be modified as follows: “<i>Development (including change of use) that involves the loss or replacement of existing community facilities / services will not be permitted unless one or more of the following criteria are met: only be permitted if:</i> • <i>It can be demonstrated that adequate alternative facilities meet the needs of the community;</i> • <i>The replacement facility is equivalent to or better quality and meets the needs currently met by the existing facility;</i> or <i>It can be demonstrated that the facility (to be lost) is no longer required in its current use and that it is not suitable or and viable for any other forms;</i> or • <i>The public benefits associated with the loss of the facility would outweigh the loss of its function</i>”. We also request the following additional criteria is inserted in Draft Policy CHW01: “<i>The provision of replacement community facilities into mixed use schemes will be supported where the facility meets and an identified need</i>”.</p>
Theatres Trust	CHW01	<p>The Trust is supportive of and welcomes inclusion of Policy CHW01 which helps protect valued facilities in Barnet from unnecessary loss in line with the NPPF and London Plan, and facilitates new facilities in the borough. We also welcome that para 8.2.1 confirms the policy applies to cultural facilities including theatres. These facilities contribute towards the cultural well-being of local people and are important for the vitality of town centres.</p>
Marstead Living Limited/IBSA	CHW01 Para 8.3.5	<p>This policy, as drafted, is considered unsound on the basis it is not positively prepared or justified. The NPPF at para 93 requires planning policies to plan positively for the provision and use of community facilities to enhance the sustainability of communities and residential environments and ensure an integrated approach to considering the location of community facilities. It also requires policies to ‘guard against’ the ‘unnecessary’ loss of valued facilities services, particularly where this would reduce the community’s ability to meet its day-to-day needs. London Plan Policy S1 sets the strategic policy context for which local plan Policy CHW01 should accord. It is noted that both the NPPF and London Plan allow the loss of existing community infrastructure where criteria are met. It is considered that the current wording is not clear in relation to where the loss community infrastructure is acceptable, in particular where community infrastructure which serves a specific community/requirement is reprovided outside the plan area. This is relevant to Site Allocation ref. 49, where the existing Kingdom Hall is being replaced off-site in a more suitable location (with respect to the location of the community need) to an equivalent or better quality As such the wording could prejudice the delivery of otherwise appropriate redevelopment sites and jeopardise their ability to meet the identified needs of the Local Plan. It is considered that the policy and supporting para 8.3.5 should be amended to confirm that the relocation of community infrastructure off-site (and out of borough where need transcends Borough boundaries and where it can be demonstrated that this would be an appropriate location) would pass the policy test where the loss of an existing community use would be acceptable. Para 8.3.5 should be reworded as follows: “<u><i>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 or through the re-provision of facilities on alternative sites. This, can include relocation to suitable sites outside of the Borough where there is a locational requirement to do so and local needs can be met elsewhere in the Borough.</i></u>...” The policy should therefore be reworded to: “<i>Development (including change of use) that involves the loss or replacement of existing community facilities / services will only be permitted if:</i></p>

Representor	Section	Summary of Comments
		<ul style="list-style-type: none"> <i>the replacement facility (either on site or in a suitable off site location) 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.</i>
Canal & River Trust	CHW02	As noted above, the Trust supports greater use of the Welsh Harp (Brent reservoir) for recreational and community uses. Research undertaken for the Trust (by Simetrica link above) has shown the wellbeing benefits of spending time by water. Our evidence (although not specific to the Welsh Harp) supports the Council's statement that COVID-19 lockdowns have demonstrated the importance of publicly accessible open space (para 8.19.1), with many of our urban waterways experiencing significant increases in visitor numbers. We strongly support the following ambition from 8.19.2: 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. However, we are somewhat surprised to see that policy CHW02 does not contain a clear reference to the importance of access to green/blue infrastructure and open space for health and wellbeing. It also does not appear to give the council a clear policy mandate for seeking improvements to the quality and accessibility of such infrastructure through developer contributions. We would suggest that this is reconsidered, especially given that ECC04 doesn't appear to us to clearly provide for this either (see below).
Barnet Cycling Campaign	CHW02	The council needs to commit that applying the healthy streets approach will mean it will lead on this by directing all possible funding towards healthy streets schemes across the borough and by adopting these policies in all planning decisions. (Comments on Active Travel Policy TRC01 below). This policy supports training in the construction industry. 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.
Andrew Glendinning	CHW02 ECC01 ECC02 ECC06	<p>The Plan describes a biodiversity metric which purports to assess an area's value to wildlife, helps to determine the impact of local development and therefore informs planning applications. The information on which this is based includes the conditions of each habitat parcel. While this does include air and noise pollution (p. 204), it does not and MUST include light pollution which has a well-documented impact on human and environmental health. "Given the current urgent need to save energy as our planet warms, and the evidence that waste light is a contributory factor to the rapid decline in biodiversity (www.sciencedaily.com/releases/2018/06/180619122456.htm), we should be urging all administrations, both local and national, to save energy and reverse biodiversity decline by tackling waste light."</p> <p>(Chapter 3, https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf). Indeed the London Environment Strategy [LES] states (p. 134) : "Urbanisation can also have indirect impacts such, as: ... noise and light pollution affecting the ability of wildlife to breed or feed successfully; and exacerbating changes to the urban climate caused by climate change." (https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf).</p> <p>The Plan needs to include a specific table on Light quality and installation requirements. These requirements must apply to all Minor, Major and Large Scale developments and include all exterior public, commercial and domestic lighting. Exterior lighting must conform to the following :</p> <p>Institution of Lighting Professionals Guidance Note 1 for the reduction of obtrusive lighting 2021: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/</p> <p>Institution of Lighting Professionals Guidance Note 8 Bats and Artificial Lighting https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</p> <p>Commission for Dark Skies (a section of the British Astronomical Association) Lighting Guidelines: https://www.britastro.org/dark-skies/pdfs/CfDS1703_E5_Good_Lighting_Guide.pdf</p> <p>These measures are all easy to adopt and will offer immediate and better protection of the bio-environment and health.</p>
Landsec	CHW02	Landsec continues to support LBB's ambition to promote the creation of healthy environments under Policy CHW02, and consider the redevelopment of GNL provides opportunity to promote the creation of healthy environments and safe, accessible, sustainable and high-quality places as sought by this Policy. The initial masterplan and feasibility studies undertaken by Landsec in 2020 offer opportunity for comprehensive redevelopment of the site to introduce ecological and biodiverse landscapes, areas of public realm, high quality-built form with a range of uses and safe, legible connection to the neighbouring MOL. Landsec's vision for the site is set out in further detail in this later sections of this Letter.
NHS Property Services	CHW02	There is a well-established connection between planning and health; in so far that the planning system has an important role in creating healthy communities. Planning can not only facilitate improvements to health services and infrastructure, thereby enabling the health providers to meet changing healthcare needs but planning also provide a mechanism to address the wider determinants of health. A vital part of this is ensuring the NHS continues to receive a commensurate share of developer contributions to mitigate the healthcare impacts arising from growth and towards delivering transformation plans. We

Representor	Section	Summary of Comments
		agree with parts b. of Policy CHW02 which seeks to allocate developer contribution towards the provision of health and social care facilities. When receiving funds, health facilities should be put on a level footing with education and public transport improvements in order to ensure that healthcare infrastructure and funding requirements arising from planned and unplanned growth across the borough are appropriately represented given its strategic importance.
TFL (Spatial Planning)	CHW02	We welcome the additional references to the Healthy Streets Approach and sustainable and active travel
Dr Arthur Fleiss	CHW02, ECC01, ECC02, ECC02a ECC06	<p>Green Infrastructure SPD list of 'green assets' (p9, table 1) includes private gardens. Each year a large number of planted front gardens are lost and replaced by paved driveways. I do not have statistics, but the volume of biomass lost in this way each year must be significant in the Borough, and more widely, across London. This loss has consequences for: - increased run-off/flooding - reduced CO2 capture through loss of plant biomass - air quality - increased urban space temperatures - loss of habitat for insects, especially pollinators, birds and other wildlife, It is important to understand that front and rear gardens, even small ones, provide habitats for flora and fauna which help to create bridges between the more significant areas of green infrastructure listed in the SPD. Thus, even though they are not publicly accessible, gardens play a significant role in maintaining and sustaining the borough's living environment. There is also an aesthetic element to creating paved areas as streets with forecourts instead of front gardens lose their 'traditional' suburban look.</p> <p>I understand there is a current requirement for planning permission where more than 5 square m. of front garden is paved but that this relates to drainage requirements rather than considerations of environment/climate change.</p> <p>Suggestion 1: As a contribution to reducing flooding, improving air quality, preserving biomass and habitat, and reducing urban heating the Council could impose requirements to retain planted front gardens, or at least larger proportions of front gardens, when applications to pave them over are submitted.</p> <p>Suggestion 2: For similar reasons, the Council could set out stronger requirements relating to planting around new developments when they grant permission for either new build or redevelopment of existing sites.</p>
Barnet Liberal Democrats	CHW03	<ol style="list-style-type: none"> 1. Given the impact of the cladding scandal on Barnet residents, we would add in a further requirement that developers with whom the Council partners on schemes have to show a proactive approach to fire safety, including a history of this in the past, or of correcting issues that have arisen. 2. We would like to see specific reference to making Barnet a safer place for women and girls, as we believe taking that as a starting point to inform design and planning will benefit everyone. 3. We would like to see a specific reference to a public health approach to crime, particularly youth crime, linked to policy CHW01 and to the Joint Health and Wellbeing Strategy. <p>Modifications: Include a specific policy that partners in development with Barnet Council have to show a proactive. approach to fire safety, including a history of this in the past, or of correcting issues that have arisen. Include specific reference to equalities issues in design, specifically for women and girls. Include a specific reference to a public health approach policy on youth crime.</p>
Brent Cross South Limited Partnership ('BXS LP'),	CHW03	As per comments on Policy CDH01, this policy should be amended as follows: <i>The Council will:</i> <i>b. as far as is practicable, require development proposals to reflect 'Secured By Design' (see Policy CDH01) and work with the Metropolitan Police's Secured by Design Officers;</i>
Joe Henry	CHW04	Part c states: "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." The policy is silent on providing much needed housing where it is demonstrated a public house is no longer in demand. The policy should be amended to encourage housing in such circumstances.
Sports England	Chapter 9	<p>Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are:</p> <ul style="list-style-type: none"> • In 2010, sport and sport related activity generated Gross Value Added (GVA) of £20.3 billion – 1.9% of the total GVA in England. This placed sport within the top 15 industry sectors in England and higher than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting (*Economic value of sport in England June 2013 published by Sport England). • Sport and sport related activity is estimated to support over 400,000 fulltime equivalent jobs – 2.3% of all jobs in England. Sport also generates a range of wider benefits, both for individuals and society: • The benefits of playing sport include the wellbeing/happiness of individuals taking part, improved health and education, a reduction in youth crime, environmental benefits, stimulating regeneration and community development, and benefits to the individual and wider society through volunteering. • Consumption of sport benefits include the wellbeing/happiness of spectators, and the national pride/feel good factor through sporting success/achievement. • The economic value of sport in terms of health and volunteering in England is estimated in 2011-2012 to have been £2.7 billion per annum for volunteering and £11.2 billion per annum for health. <p>Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is, has not. The</p>

Representor	Section	Summary of Comments
		introduction of B8 distribution challenged local Authorities in the 80's and '90s as more of these uses came forward. Sport is often overlooked as an employer. It is Sport England's contention that the Local Plan should consider sports uses, such as fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites as sports uses do create sustainable employment opportunities and provide work experience and qualifications. When sports facilities are designed in as part of an employment area e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to. Furthermore, it should not be overlooked that there are usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms, or commercial football, e.g. Football First, or a gymnastics club, than a 500,000m2 B8 use. Sport England, therefore, would encourage the inclusion of sport and recreation facilities in traditional employment areas. Overall, despite some positive aspects for health and wellbeing with the Draft Local Plan Sport England does not consider that the Draft Local Plan is sound as it is currently not justified or in line with national policy for the reasons outlined above. Sport England would be happy to work with the Council to overcome these issues so the Local Plan would effectively plan for sport.
Barnet Climate Action Group	Chapter 9	It is disappointing that throughout the Economy section of the Barnet Draft Local Plan there is no reference to supporting or growing the green economy or supporting and promoting green skills. We feel this is a key omission, as the need for mass retrofit alone will be a huge driver for skills development and economic opportunity, even without the need for green construction skills to build low carbon development within identified Growth Areas. That there is no mention of green skills in Policy ECY03 (Local Jobs, Skills and Training) is a major omission.
Brent Cross South Limited Partnership ('BXS LP'),	Para 9.10.5	The qualifying comment beneath Table 15 should be amended to remove reference to 'positive' indexation. BCIS costs go both up and down and if the formula rates are to track BCIS costs, then they should track absolutely.
Brent Cross South Limited Partnership ('BXS LP'),	Para 9.6.1	This should be amended as follows in the interests of clarity and consistency: <i>The proposals for the Brent Cross Growth Area 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.</i>
Ropemaker Properties Ltd	Para 9.7.6	Para 9.7.6 is not sound because: a) It misunderstands the Agent of Change principle which is directed towards new residential development in proximity to nuisance-generating uses (to be retained), whereas co-location provides the ability to redevelop sites in a manner where uses can co-exist and be designed on that basis. The Agent of Change is not therefore a reason why any application for co-location in an LSIS must be employment led.b) NLP Policy E7 and its supporting text does not require co-location schemes to be 'employment led'. Para 6.7.1 of the NLP is clear that co-location proposals are encouraged to explore the potential to intensify industrial activities, this is not the same as 'employment led'. Accordingly, para 9.7.6 is not sound as it is not justified or in accordance with the NLP. Para 9.7.6 should be amended as follows: <i>Co-location of residential uses in a LSIS can could prove problematic for both the existing businesses and new residents in regards to impacts of noise, dust, operating hours as well as traffic vehicles manoeuvres and overall quality of amenity if not designed appropriately. 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 should be employment led³⁸ and All co-location proposals in LSIS should therefore be masterplanned to ensure the employment and related activities are not compromised in terms of their continued efficient function, and the potential for the intensification of employment activities are fully explored. The masterplan approach should 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.</i>
Brent Cross South Limited Partnership ('BXS LP'),	Para 9.9.1	As outlined above, it is considered that Brent Cross Growth Area could be a location for well-planned logistics and distribution uses. It is therefore suggested that this para is amended as follows: <i>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, <u>with other employment uses being considered where it can be shown that they are able to operate without negatively impacting upon other uses.</u></i>
Joe Henry	ECY01	The policy does not support mix use development providing housing where there is no net loss of employment floorspace and the residential use is compatible with surrounding uses. This policy therefore, would be in conflict with the NPPF and the London Plan which promotes mix use development as part of the solution to provide much needed housing. There is no justification not to allow a mix use development that still protects the integrity of an employment area.

Representor	Section	Summary of Comments
DTZ Investors UK Ltd	ECY01	<p>ECY01 seeks to protect and promote new employment opportunities. With respect to industrial development, the policy wording supports appropriate proposals within Locally Significant Industrial Sites (LSIS) for Class B2 (general industry); Class B8 (storage or distribution); and/ or uses related to light industrial or research and development (now Class E(g)(ii) and (iii)); and Sui Generis uses, where it is an employment generating use compatible with an industrial use. Part (j) of the policy supports new industrial employment space (as defined above) outside of LSIS if the following criteria are met:</p> <ol style="list-style-type: none"> 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 <p>The supporting text for the policy highlights that Barnet has a relatively low supply of established industrial sites and office accommodation and that requirements for this space are changing, partly in response to the COVID19 pandemic. Furthermore, para 9.7.1 states that the London Industrial Land Demand Study (LILDS) identifies Barnet as needing to retain industrial land as the vacancy rates are below the London average. Para 9.7.3 states that Barnet envisages meeting its identified need for industrial development through intensification and windfall.</p> <p>DTZ is supportive of this policy, which seeks to support economic growth and productivity in line with para 82 of the NPPF, and which also seeks to make the most effective use of suitable sites. As mentioned in representations to draft Policy GSS01 we support that Friern Bridge Retail Park is included in NSOA, as it could be a suitable redevelopment site in the future for logistics and distribution. The Site's redevelopment for logistics / distribution related uses would comply with part (j) of the policy, as it would meet the four required criteria, as explained below:</p> <ol style="list-style-type: none"> i. it would make effective use of the existing site and contribute towards the regeneration of the wider area; ii. It is well connected to the surrounding road network via the A406; iii. the redevelopment of the site could be designed to provide a buffer between the nearest residential dwellings and any potential adverse impact on residential amenity could be appropriately mitigated; iv. the Site is unallocated. <p>In light of the above, DTZ is supportive of draft Policy ECY01, as it is positively prepared, justified, effective and consistent with the NPPF, as such, the policy is sound.</p>
Brent Cross South Limited Partnership ('BXS LP'),	ECY01	<p>Clarity is required as to whether the Brent Cross Growth Area would be considered an 'allocated site' within the context of Policy ECY01 (j) which, based on the current wording, might prevent certain employment uses coming forward at Brent Cross by way of future planning proposals. In particular, we consider that the Brent Cross Growth Area could potentially play an important role in the provision of last-mile logistics, taking advantage of its high accessibility and ability to plan and masterplan the co-location of other uses effectively. We have suggested revised wording to Policy ECY01 to provide the requisite flexibility. As highlighted throughout the Plan, Brent Cross Growth Area will deliver over 395,000m² of office space, representing the vast majority of Barnet's economic growth over the Plan period. In order to ensure that quantum of space is deliverable, it needs to be attractive to potential occupiers. BXS LP are finding that there is a disparity between office occupier requirements for car parking and the London Plan car parking standards (incorporated into the Draft Local Plan by Policy TCR03). This highlights the difficulties in attracting 'statement' occupiers to outer London locations which are not yet established neighbourhoods or town centres. Whilst we support the Plan's general objectives to support more sustainable modes of transport, we feel that the policy should explicitly recognise that there may be circumstances in which stringent application of London Plan parking standards may not be appropriate (even if such flexibility is applied in the short term or until the new town centre is established). Further detail is set out in the representations by Steer in respect of Chapter 11, appended to this letter.</p>
Barnet Society Committee	ECY01	<p>We support the view submitted by the New Barnet Community Association that this policy is insufficiently visionary about job creation. We agree with the New Barnet Community Association that the Local Plan should be more proactive and imaginative, for example linking provision of new kinds of jobs and new kinds of homes.</p>
Ropemaker Properties Ltd	ECY01	<p>Policy ECY01 part g) places a requirement on co-location schemes within LSIS to be 'employment-led'. This is defined by footnote 38 as: <i>'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'</i>. Whilst the objective must always be to prioritise employment uses within LSIS, this policy is overly rigid and does not allow for circumstances whereby an LSIS site can accommodate enhanced employment provision (either through quality improvements and/or increased floorspace) but also presents an opportunity to maximise other uses (i.e. residential use in proximity to major transport infrastructure) and in doing so the latter might be proportionally greater overall. There should be a provision within the policy to allow for such an eventuality, in order to maximise the potential of sites with co-location potential, and to not unduly restrict opportunities. The policy is also inconsistent with NPL Policy E7 which does not require co-location schemes to be 'employment led'. Para 6.7.1 of the NLP is clear that co-location proposals are encouraged to explore the potential to intensify industrial activities, this is not the same as</p>

Representor	Section	Summary of Comments
		<p>'employment led'. Accordingly, Policy ECY01 is not sound. Policy ECY01 part g) should be amended as follows: <i>g) Where co-location of residential uses is proposed in an LSIS the development should be employment led explore the potential to intensify or consolidate employment uses. and tThe Agent of Change principle should be used in favour of existing and proposed employment uses (including the potential to expand or modify over time). The introduction of residential uses into an LSIS should not prejudice the LSIS its ability to function as an employment area. .</i></p>
Hurricane Trading Estate	ECY01	<p>While we have no comments in respect of the proposed approach to co-location development on Locally Significant Industrial Sites, we are concerned to see that Hurricane Trading Estate and the adjacent Travis Perkins site – i.e. all of our clients' landholding – is to be designed as a Locally Significant Industrial Site (LSIS). This would be a change from its existing status as a Non-Designated Industrial Site (NDIS). We hereby object to the proposed consolidation of the land as LSIS. It does not appear that our clients have been consulted on this proposal directly. After positive pre-application discussions, our clients are reviewing the advice received and are appraising potential development options. Pre-application advice was pursued on the basis that the site was not statutorily protected as a LSIS and the proposed elevation of its status materially alters the planning policy context under which prospective development proposals would be assessed. It is counter-productive for the Council to allocate the site as LSIS when it is aware of our client's emerging proposals to regenerate and intensify the site. The proposed wording of Policy ECY01 states: 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. This is a more stringent policy assessment than if the site were to remain as NDIS, which considers other factors including (inter-alia), the "contribution of the proposed use to the Council's growth objectives for the local area". While our clients have set out their desire to pursue a genuinely mixed-use proposal with the provision of flexible commercial / industrial floorspace, the proposed wording of ECY01 would significantly divert focus away from the residential element of the proposal, if the proposed designation as LSIS is carried forward. In effect, the policy requirements to make a scheme including residential development acceptable in principle would become more complex. This has significant potential to stifle the opportunity to intensify the planning benefits offered by redevelopment. Our pre-application meeting highlighted how new residential development could play a significant role in linking together two key regeneration areas, through enhanced public realm and place-making, in a location that has been historically overlooked by planning policy.</p>
Clarion Housing Group and the Huntingdon Foundation	ECY01	<p>Draft Policy ECY01 and the policy's associated supporting text is considered unsound in the context of NPPF (2021) Para 35; it is not justified, effective or consistent with the NPPF. It fails to provide sufficient clarity or flexibility to enable the delivery of sustainable development over the plan period. The Nos. 30-120 Colindeep Lane site currently comprises non-designated employment/industrial land in the adopted Statutory Development Plan. The Site is shown as 'Area of Business Location' in the Draft Local Plan and the Changes to the Policies Map (Reg 19); Map 52 (Nos. 30-100 Colindeep Lane). The Draft Local plan and associated evidence base fail to consider if the site could reasonably be redeveloped to provide an intensified use as part of a residential led mixed use scheme or provide sufficient justification for the site's designation as an 'Area of Business Location'. The Draft Local Plan fails to set out a definition of 'An Area of Business Location', even though these are shown within the Changes to the Policies Map (Reg 19). Clarion Housing Group and the Huntingdon Foundation request that LB Barnet confirm the definition of 'An Area of Business Location' and allow further representations, if required in regard to the implications of this definition on the potential mixed use redevelopment of Nos. 30-120 Colindeep Lane, to be made prior to the submission of the Local Plan for examination. Draft Policy ECY01 should be modified to provide greater flexibility regarding mixed use redevelopment to ensure it is effective and in compliance with general objectives of the NPPF (2021) which promote sustainable development and encourage the optimisation of land. Mixed-use redevelopment should seek to optimise residential development in order to deliver other significant planning benefits while demonstrating that the maximum feasible and viable proportion of non-residential floorspace is included within the scheme, and/or the re-provided space will result in an intensification of uses/ increased job densities. For example, the existing commercial floorspace at Nos. 30-120 Colindeep Lane. The mixed-use redevelopment of the site provides an opportunity to provide more modern, fit for purpose facilities that would increase job densities. Draft Policy ECY01 should be modified to provide greater flexibility to truly encourage the redevelopment of acceptable sites over the plan period. Flexibility is required to ensure deliverable schemes are secured and an appropriate and sustainable balance between meeting other policy objectives (i.e. housing need) and meeting economic aims is achieved and also address the changes in demand for workspace in light of the Covid-19 pandemic. Criteria (g) of Draft Policy ECY01 is unsound on the basis it is not effective or justified. It requires financial contributions to be secured from development that results in a net loss of employment floorspace. This is wholly inappropriate. It cannot be defined as effective due to the lack of flexibility; it fails to consider that the net loss of employment may be appropriate in relation to site specific circumstances. Criteria (g) assumes a one size fits all approach across the Borough and fails to address the varying character of the borough. It unnecessarily priorities the net re-provision of floorspace ahead of other key planning priorities such as the delivery of new homes. Furthermore, it assumes that all existing employment floorspace is in use, suitable for it's purpose and fails to allow flexibility to re-evaluate specific sites and the quality and value of employment floorspace they provided. In some cases, it may be necessary to release under-utilised employment floorspace and re-provide a smaller quantum of floorspace which would perform better over the plan period as part of mixed use redevelopment. The aim of Criteria (g) is not justified or realistic.</p>

Representor	Section	Summary of Comments
		<p>The Draft Local Plan should be modified to define an 'Area of Business Location'; at present Draft Policy ECY01 does not refer to or set out the proposed strategy in relation to such locations. Once defined, Clarion Housing Group and the Huntingdon Foundation reserve the right to provide further representations. LB Barnet have failed to reasonably or appropriately consult on the Draft Local Plan's definition of an 'Area of Business Location'.</p> <p>Draft Policy ECY01 should be modified to provide greater flexibility regarding the partial replacement of commercial floorspace in relation to mixed use redevelopment that accords with other relevant policies and planning priorities; i.e. the delivery of homes in the Colindale Growth Area and Opportunity Area and ensure it is sufficiently flexible to appropriately adapt and respond to change over the plan period.</p> <p>Draft Policy ECY01 should be modified as followed: "... 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 need to be justified <i>and demonstrate the alternative proposal is more suitable and appropriate in these areas will not be supported.</i> i) <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></p> <p><i>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).</i></p> <p><i>ii. Loss of a commercial use at ground-floor level.</i></p> <p><i>iii. Contribution of the proposed use to the Council's growth objectives for the local area.</i></p> <p><i>vi. The loss of any existing employment floorspace in regard to the mixed use redevelopment of the sites which contribute to wider planning objectives such as the delivery of homes and proportion of affordable homes. ... 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".</i></p>
New Barnet Community Association	ECY01	<p>The Employment Land Review identifies the pressure on employment land and how this is being eroded in favour of housing development. However, there are very few measures to protect employment land from housing development and Policy ECY01 allows this to take place so long as a financial contribution is made. Given residential values will always exceed employment land values, the reduction in employment land will only continue unless strong policies are in place. The Employment Land Review identified the importance of sites like North London Business Park yet this site has an extant consent for housing. The Policy appears passive in that it will support applications brought forward in Locally Significant Industrial Sites (LSIS) but it fails to actively promote these sites or encourage employers to relocate to Barnet. It also tacitly precludes employment opportunities being brought forward in non LSIS.</p> <p>There is no designation of Tech Hubs or Research & Development sites which have the potential to bring skilled, well paid employment to Barnet and as such will mean that job creation is limited to office and retail employment, both of which have suffered during the covid pandemic. The policy fails to provide a vision of what Barnet could be achieving in comparison to cities like Coventry, Bradford or Nottingham all of which have smaller populations than Barnet. The local plan should take a more positive approach to job creation by setting a goal of proactively attracting new employers into the borough. Sites for technology, medical research, pharma or other skilled employment should be identified and designated, coupled with resources such as a business development unit to attract in employers to Barnet. The target for the number of jobs to be created should be linked to the number of new homes built so that additional new homes can only be built if there is a corresponding number of jobs created. This would help to reinforce the link between housing and employment, something which will be essential for a sustainable society.</p>
CasaBella Developments	ECY01	<p>The draft policies on assessing alternative uses on non-designated employment sites within Policy ECY01 of 5 the Draft Local Plan are unclear. Part (i) of the policy should make clear that the non-designated employment sites relate to those sites in office and industrial use only. Employment can refer to many uses, i.e. retail, leisure, sui generis type uses such as a car showroom use. Based on pre-application discussions with the Council, the provisions within part (i) do not apply to such uses; therefore, the wording of part i) should be amended as follows: <i>i) In assessing proposals for alternative uses to those outlined in (a), (b) and (c), on non-designated employment office and industrial sites, as well as London Plan Policy E7C the following will be taken into consideration:</i></p> <p>In relation to i) there should be no requirement for premises to be vacant for over 12 months. Where a lease is due to end and discussions around extending a lease indicate that the occupier will not be remaining in the premises, an owner would commence marketing ahead of vacancy. It would not be sustainable to leave the premises vacant for 12 months, where there could be opportunities to find an occupier earlier or to consider alternative uses within an earlier timeframe. The requirement for a period of vacancy should therefore be deleted, as the primary consideration should be whether there is a reasonable prospect of the site being occupied for the relevant employment use. In accordance with the NPPF, policies need to reflect changes in the demand for land in the context of making effective use of land; therefore, requiring vacancy would not be a reasonable approach. As such, the draft Plan is not considered to be 'justified' or 'consistent with national policy'.</p>
Brent Cross South Limited	ECY02	<p>We have concerns that the impact of the Plan's affordable workspace policies have not been fully considered as part of the evidence base. The BNP Paribas Real Estate Local Plan Viability Assessment (May 2021) tests the impact of the affordable workspace requirements at paras 6.18 to 6.19, however it is only</p>

Representor	Section	Summary of Comments
Partnership ('BXS LP'),		tested as part of mixed use, residential schemes – the development typologies tested in the assessment are listed at Table 4.5.1. In all cases the provision of commercial floorspace is ancillary to residential. As such, it would appear that the provision of residential is cross subsidising the ability of these typologies to viably support the affordable workspace policies. There is no typology which reflects a commercial-only scheme. Considering the outer London location of the borough, we would expect the viability of a standalone office development to be significantly more challenging. In the absence of a commercial-only typology we suggest that the Council include suitable wording that conditions the provision of affordable workspace by reference to scheme viability. The Plan provides for affordable workspace obligations to be provided either on or off-site. This is welcomed as in many cases the absolute obligation to provide on-site affordable workspace can affect the feasibility of commercial development. The Plan includes a formula that will be used to calculate off-site contributions, which multiplies the Gross Internal Area (of the affordable workspace requirement were it to be on-site) by a base build cost rate. The rationale for the formula is unclear and we cannot find anything in the West London Alliance Workspace Study that explains the adoption of this formula. The formula has the potential to require significant financial contributions, particularly in a Brent Cross context, so as above, reference to overall scheme viability is needed.
Brent Cross South Limited Partnership ('BXS LP'),	ECY02	If it is intended that this policy applies to the whole OA (as opposed to the Brent Cross Growth Area, part a) should be re-phrased to refer to the 'Brent Cross/Cricklewood Opportunity Area'. The policy does not set out the level of discount to market rents that the Plan expects the 10% of gross floorspace to be let at by the developer. This should be clarified. Reference should be made that the provision of the Council's affordable workspace policies are subject to viability. The policy is silent on the extent of fitting out obligations on the developer, which should be limited to Cat A fit out. This should be clarified within the policy or supporting text.
Clarion Housing Group and the Huntingdon Foundation	ECY02	ECY02 and the supporting text fail to fully comply with the provisions of London Plan (2021) Policy E3. It is considered unsound in the context of NPPF (2021) Para 35 on the basis it fails to provide sufficient detail to ensure flexibility and effective implementation. London Plan (2021) Policy E3 states that Boroughs should consider detailed affordable workspace policies in light of local evidence need and viability. Draft Policy EY02 states that "a minimum of 10% of gross new employment floorspace, or equivalent cash-in-lieu payment for off-site provision of affordable workspace" and fails to address viability matters. As drafted Draft Policy EY02 provides very little flexibility. We consider it is necessary to provide a level of flexibility which makes the policy and supporting text effective, to ensure the provision of affordable workspace and quantum should be subject to viability. Draft Policy ECY02 states that " (a) new employment space in the Borough's s designated employment areas and mixed use development, in Brent Cross, Edgware, New Southgate and District Town Centres should provide affordable workspace ...". The draft supporting text in relation to Draft Policy EY02 fails to set out what constitutes a 'designated employment area' and 'new employment space'. As previously mentioned in the representations set out in relation to Draft Policy ECY01 the Draft Local Plan fails to set out a definition for an 'Area of Business Location' . The Draft Plan should be updated to provide clarity on the definitions of a designated employment area, new employment space and an 'Area of Business Location'. Draft Policy ECY02 states that the 10% provision of affordable workspace should be calculated on the basis of 'gross new floorspace' . However, it would be more appropriate to calculate the provision on NIA (Net Internal Area) rather than GIA (Gross Internal Area) as the NIA better reflects the actual useable and lettable area of employment generating floorspace. Draft Policy ECY02 and the supporting text should be modified to ensure that the provision of affordable workspace is only required where viable to address an identified local need to ensure the policy requirement is justified and effective in accordance with NPPF (2021) Para 35 and the London Plan (2021). We would request that Criteria A of Draft Policy ECY02 is updated as followed: "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 (based on NIA), or equivalent cash-in-lieu payment for off-site provision of affordable workspace where viable".
Joe Henry	ECY03	The policy requires compliance with the Council's Delivering Skills, Employment, Enterprise and Training (SEET) from Development SPD (2014) or any subsequent SPDs. This in effect would make the SPD a policy. This is unreasonable because the SPD has not gone through the same challenge process as adopted policies. The SPD is also fundamentally flawed for many reasons and is nonsensical in many respects – previous objections and concerns raised about the SPD before adoption were ignored. The requirements of the SPD are massively onerous and monetary calculations are outrageously high with no proper justification. This document needs to be reviewed thoroughly as part of the new Local Plan requirements.
Brent Cross South Limited Partnership ('BXS LP'),	Policy ECY01	The reference to Brent Cross in Part b) of this policy should be Brent Cross Growth Area. In addition, and having regard to comments above in relation to the provision of industrial uses at Brent Cross, this policy should be amended as follows: j) Supporting <i>New employment space will be supported outside of the locations outlined in (a), (b) and (c) if the following criteria are met:</i> iv. <i>The site is not allocated in Annex 1 of this Plan (Schedule of Site Proposals) for an alternative use including residential, education or community uses.</i>

Representor	Section	Summary of Comments
Natural England	Chapter 10	<p>An increasing number of Local Authorities across England are formally declaring climate change emergencies. The UK became the first country in the world to declare a climate emergency and the government have recently set in law a climate change target to cut emissions by 78% by 2035 compared to 1990 levels, which will bring the UK more than three-quarters of the way to net zero by 2050. National planning policy outlines the need for Plans to take 'a proactive approach to mitigating and adapting to climate change', that policies should 'support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts'. The Government's 25 Year Environment Plan sets out a goal for mitigating and adapting to climate change. Natural England advise all Local Plans acknowledge the climate and ecological emergencies currently underway and recognise the important role of the natural environment to deliver measures that reduce the effects of climate change and enable nature recovery. We advise the Plan makes provision to secure appropriate reductions in carbon emissions over the Plan period to avoid further deterioration and make a clear commitment to net zero by an appropriate date that meets or exceeds the Government's international commitments. In considering climate change 'mitigation' (reducing levels of greenhouse gases in the atmosphere) and 'adaptation' (preparing for and dealing with the consequences of climate change), we strongly recommend that the Plan incorporates the important role of the natural environment to address the effects of climate change. This can be delivered via the implementation of 'nature-based solutions', which involves the restoration of ecosystems by means such as woodland planting on low grade agricultural land or in urban settings, restoration of permanent species-rich meadow pasture or removal of inappropriate plantations on former priority habitat with restoration of the latter, for the long-term benefit of people and nature. It is recommended such measures are brought together into a strategic approach that delivers multifunctional benefits to people and wildlife that links to other aspects of the Plan, including green infrastructure implementation, health and wellbeing, delivery of biodiversity net gain, natural flood management, air and water quality benefits, as well as carbon sequestration (climate mitigation) and climate adaptation. We recommend consideration is also be given to addressing issues on habitats and protected sites that will be exacerbated by climate change, such as fire risk, reduction of water resources and flooding. We also recommend the Plan makes clear that housing delivery policy will not be met at the expense of such targets or sustainability policies, to ensure sustainable development is properly achieved across the Plan period. Natural England would be happy to advise further on this aspect. Further advice on Climate Change adaptation can be found within Annex A below.</p>
Barnet Labour Group	Chapter 10	<p>We agree with the Barnet Society's submission earlier this year that stated: "This, 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, either in the draft Plan or in the Council's SPD on Sustainable Design and Construction. And the only reference to promoting a circular economy is a reference to Policy S17 in the London Plan. 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." The Labour Group does not believe Barnet Council has any sense of urgency when it comes to climate change, and actions do not go far enough to deal with it. One small example - the document commits the Council to zero carbon by 2050 - the London Plan target is actually 2030.</p>
Peter and Nargis Walker	Chapter 10	<p>The proposed building works will take several years to complete and will create undeniable chaos and pollution in the heart of many of Barnet's town centres. In Finchley Central, the construction of four tower blocks at the corners of key arterial roads in the town centre, Regents Park Road, Ballards Lane, Station Road and Nether Street, will severely impact neighbouring residential streets and businesses. Main roads will be closed or severely restricted and traffic rerouted through residential areas for months at a time. It will create noise pollution, environmental pollution, and disruption to utilities as new pipelines etc are laid. It will restrict light in every direction. The impact on our town centre and businesses could be catastrophic, and residents will suffer.</p> <p>The Northern Line, which is the key link between all these housing plans, is already overcrowded. Sudden, very large population growth at key points of the route, in particular 4 at Mill Hill and Colindale, will overwhelm the services. There is nothing in the proposals to alleviate this. Given the substantial population increases, there are no plans included for additional schools, GP and health services, hospitals, public transport or any of the other services required to support such growth. Finchley Central already struggles to cope with the demand for services of its existing population. There is little in these plans to underpin the vision statements and scant evidence that it actively seeks to preserve the character of the town or borough. While the plan talks of responding to the challenges of growth in the 21st Century by creating innovative solutions, in reality it serves up the same old discredited solutions. This plan will deface our town centres, impact negatively on small independent businesses and provide temporary housing in vast tower blocks on noisy railway lines and roads that will encourage people to move out and on as soon as possible. In other words it will create an itinerant rather than a stable, rooted population. The plan states somewhat grandly that 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. Indeed it can - but it does not. Its proposals are the polar opposite of those early town planners who created such desirable, sustainable and rooted communities. It does not deliver any of the desperately needed changes that Finchley Central and its residents would hope for and deserve. To conclude, this plan is really not fit for purpose.</p>

Representor	Section	Summary of Comments
Danielle Pollastri	Chapter 10	Today's long awaited IPCC report on global overheating shows much of the draft local plan to be completely out of date given this new and concerning information. We need to rethink how the built environment should accommodate and minimise CO2 emissions and its resulting extreme weather patterns. Cricklewood's subterranean infrastructure was created for less population density and a more temperate climate. It is already groaning from years of increased load and minimal maintenance. Just look at the way our roads quickly become flooded with short bursts of rain. And we are only in August. What will the noticeably wetter months bring? Every local family house sold to a developer has been converted into 2-4 flats, each with their own bathrooms. 2-4 families when before there was only one. High rise developments have multiple families and associated bathrooms, all flushing, showering and rinsing into Victorian plumbing systems unfit for modern purposes. Revise the draft plan for Cricklewood's B&Q site to reflect the urgency of the coming changes. If we don't adapt quickly, we will be more in need of boats and life jackets than poor value high density buildings.
Barnet Labour Group	Chapter 10	There must be more robust protection of green and open spaces and the greenbelt. The Council's Parks & Open Spaces Strategy is clear about the intention of building on green and open spaces - particularly on those deemed 'low quality, low value'. This category is unacceptable and should be scrapped. All Barnet's green and open spaces should be protected from development that is not park or leisure related. The Council's budget still has a budget headline included for building solar farms and batter storage units on 'low quality, low value' open spaces. This budget headline should also be scrapped - green and open spaces are not the appropriate place for solar farms and battery storage units, the Council's brownfield estate could accommodate this more appropriately. We also support many of the comments made in the submission by the Barnet Green Spaces Network (copy attached).
Pinkham Way Alliance	Map 7	3. Inconsistencies in Local Plan maps. The 2017 consultation on the Council's Green Infrastructure SPD revealed an inconsistency between the maps in the Local Plan 2012 and those presented in the GI draft. Map 10 of the adopted Local Plan had marked the Pinkham Way site as 'Local Park'; Map 7 of the GI draft omitted this. When a respondent pointed this out, the Council corrected Map 7 in the final GI SPD so that it was consistent with the Local Plan Map 10. The present draft Local Plan contains the identical omission at Map 7. Hollickwood Park is marked as 'Local Park', but once again the map omits to mark the council's portion of Pinkham Way as 'Local Park'. Policy ECC06 seeks to ' <i>... ensure that the requirements of the Green Infrastructure SPD are met</i> '. This must surely include accurate details of local sites in the adopted SPD. It is unacceptable for the Council to have repeated this inaccuracy; it should correct it as a matter of soundness. Although the Pinkham Way site is outside Barnet, it is nonetheless material to the supply of Open Space in the Freehold Area. Without the inclusion of the site, the Freehold is deficient in Open Space.
Canal & River Trust	Page 217	Our regulation 18 response explained that the 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. enhance the biodiversity, water quality and amenity value of the Pymmes Brook (10.26.14). We note from 10.14.5 that this may involve working within developers and the EA to reduce levels of urban runoff and remove invasive species.
Barnet Green Spaces Network	Sections 10.14 & 10.15	10.14 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 (needs to be become bolder – it must reach the highest classification level by 2027) 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. (If a 'good ecological level' is all that is being pursued it suggests that the recommended technologies and suite of design guidance SPDs are not up to scratch.) 10.15 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, Barnet will aim to rewild and restore its rivers and watercourses should be de-culverted and restored to a more natural state in order to improve biodiversity aiming to at least double biodiversity by 2036, improve water quality, provide a haven for nature and residents alike and help reduce the speed of run off. Buildings should not be sited over the top of new or existing culverts/ordinary watercourses.
Hertsmere Borough Council	Para 10.25.2	Neighbouring authorities in Hertfordshire, including Hertsmere, and elsewhere in London are having to look again at green belt boundaries in the context of housing need identified through the application of the standard method. It appears that only minor inconsistencies/errors in the current green belt boundary are addressed in the Barnet local plan, with there having been no assessment of whether exceptional circumstances exist which would justify release of green belt in order to enable a higher housing target to be achieved. Consideration of whether exceptional circumstances justifying the release of green belt exist such that a housing target closer to that indicated by the application of the standard method could be achieved should be undertaken.

Representor	Section	Summary of Comments
Peter Piper	Para 10.3.1	Para 10.3.1 has a brief, one sentence mention of the carbon offset fund. In 10.5.5 the statement “Where carbon reduction targets are unable to be met onsite” is <u>vague, if not meaningless</u> . Also this section does not say to how the resource generated from this fund will be either maximised or used. A revised wording is suggested below. I appreciate that it is still not a legal requirement for Barnet Council to seek carbon offset funding. However Barnet should exploit this resource to the full when approving developments that are not carbon zero, since it is a very valuable way generating funds for the “credible path to achieving net zero emissions” (6.13). This resource can then be used (as is currently being done very effectively by certain other London Boroughs) to retrofit its older housing stock for higher energy efficiency (an action which would, in turn, greatly benefit the residents of this older housing stock, many of whom are on limited incomes). At present Barnet is not being very transparent about how it uses carbon offset funding. For the reason given above carbon offset payments should not be merely “sought” – as stated in the draft plan (10.5.5) - but “deemed mandatory” for all new developments.
Peter Piper	Para 10.5.5	Under 10.5.5 I propose changing the text to: “Besides optimising the energy efficiency of new buildings Barnet will also seek to retrofit its older buildings for higher energy efficiency. Carbon offset payments will be deemed mandatory for new developments that are not carbon zero. These carbon offset payments will be used to provide part of the resource that will be needed to further the Council’s path to achieving net zero emissions.”
Sanjay Maraj	Paras 10.26.9 10.26.10	<ol style="list-style-type: none"> 1. 10.26.9 – it is an excellent idea to include this biodiversity measure, but the wording in 10.26.10 needs adjusting, as it means a developer can create buildings without providing any local biodiversity value, and the council can decide which other area in Barnet that developer should provide provision for to compensate. 2. This also has potential to be abused, with lower projected costs being estimated, which further dilute the contribution. 3. This is an opportunity for transparency with the developer engaging the council and local community to evaluate their alternative local solutions. <p>1- 10.26.10 should read: “Where this is proven not to be possible, there will be a requirement for the solution not delivered on site to be provided offsite at a location that benefits the community within the immediate vicinity of the development”</p> <p>There should also be something that ensures the developer has robustly explored alternative on site biodiversity solutions, with fully detailed costs.</p>
Home Builders Federation	ECC01	The policy is unsound because it is ineffective and contrary to the direction of national regulation. HBF advises strongly against local plans policies on matters relating to the construction and performance of residential buildings. This is an area that is subject to great change over the next few years as the Government, working with housebuilders and suppliers, devise a feasible pathway to zero carbon homes. Consequently, there is the risk that local plan policies in this area will become out-of-date swiftly. Local plan policies from the past on matters relating to the environmental performance on new dwellings have fallen short, such as the enthusiasm for district heating systems with residents bound-into expensive contracts from which they are unable to escape, and problems with over-heating (hence the new emphasis on ventilation in the revised Building Regulations – Part F). We advise a strongly against the Council making policy in this area.
Isabelle Ficker	ECC01 ECC02 ECC04	The Plan describes a biodiversity metric which purports to assess an area’s value to wildlife, helps to determine the impact of local development and therefore informs planning applications. The information on which this is based includes the conditions of each habitat parcel. While this does include air and noise pollution (p. 204), it does not and MUST include light pollution which has a well-documented impact on human and environmental health. “Given the current urgent need to save energy as our planet warms, and the evidence that waste light is a contributory factor to the rapid decline in biodiversity (www.sciencedaily.com/releases/2018/06/180619122456.htm), we should be urging all administrations, both local and national, to save energy and reverse biodiversity decline by tackling waste light.” (Chapter 3, https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf). Indeed the London Environment Strategy [LES] states (p. 134) : “Urbanisation can also have indirect impacts such, as: ... noise and light pollution affecting the ability of wildlife to breed or feed successfully; and exacerbating changes to the urban climate caused by climate change.” (https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf). Greening the built environment is properly identified as potentially making a significant contribution to climate change mitigation as well as supporting and being closely associated with priority species [LES, p. 139] Light pollution must be addressed as it is an important factor affecting plant metabolism and the health of insect populations which are essential for plants e.g. pollinators which in turn supports the food growing strategy (London Plan 2021 Policy G8). The NPPF, para 180 section c states the need to “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”. The NPPF further requires planning policies and decisions to contribute to and enhance the natural and local environment by “minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;” (NPPF, Chapter 15, para 174 (d)) “The Mayor of London has a legal duty* to set out policies and proposals in this strategy relating to the natural environment and biodiversity. The Greater London Authority is also subject to the ‘biodiversity duty’, which requires all public bodies to have regard to conserving biodiversity as part of their policy development, decision making and operational activities.” [LES p. 148] [* Natural Environment and Communities Act 2006]. DEFRA’s “UK Biodiversity Indicators” report from 2019 shows that there has been a sharp decline in insect numbers in recent decades, with a 31% drop in insect pollinators between 1980 and 2016 and a 60% decline in the 2,890 “priority” species from 1970 to 2016/12. Similarly, the National Biodiversity Network’s State of Nature report from 2019 says that “Increases in air, light

Representor	Section	Summary of Comments
		<p>and noise pollution, human disturbance and predation by domestic animals particularly affect biodiversity in urbanised areas.” [State of Nature Report, p. 31 https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf] The Mayor of London’s paper on Biodiversity www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/biodiversity specifically mentions the importance of pollinators e.g. bees. Lepidoptera (of which approximately 90% are moths) should also be recognised as pollinators since they contribute approximately 15% of all pollination. The London Environment Strategy https://www.london.gov.uk/what-we-do/environment/london-environment-strategy also includes protection of priority species. The increasing use of high CCT (blue spectrum) LEDs is extremely harmful and the choice of warm white, 2200K LEDs rather than LEDs in the 2700K – 4000K+ range, is vital. Barnet must also flag up the current legal framework as the statutory nuisance regime limiting the exemptions in section 79(5B) of the Environmental Protection Act 1990 needs to change. Under the current regime people affected by light nuisance from exempt premises can find it difficult to obtain redress. It would also provide much better protection for the bio-environment. If the exemptions were removed, local authorities would have a more effective method of preventing nuisance lighting from these premises. Further, the “best practicable means” defence would give adequate protection for the legitimate use of light for health and safety reasons, and responsible operators already employing “best practicable means” would not have to take additional measures to abate artificial light nuisance. The policy needs to include a specific para on Light quality and installation requirements. Public lighting must be dark sky-friendly and subject to a ‘proof of need’ and operated at the ‘lowest level of illumination’ requirement before installation. Exterior lighting must conform to the following : Institution of Lighting Professionals Guidance Note 1 for the reduction of obtrusive lighting 2021 : https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/ Institution of Lighting Professionals Guidance Note 8 Bats and Artificial Lighting https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/ Commission for Dark Skies (a section of the British Astronomical Association) Lighting Guidelines: https://www.britastro.org/dark-skies/pdfs/CfDS1703_E5_Good_Lighting_Guide.pdf These measures are all easy to adopt and will offer immediate and better protection of the bio-environment and health.</p>
Carolyn Simon	ECC01	<p>The plan fails to recognise the issue of light pollution – its impact on wildlife particularly birds, and on climate change through wasted energy. In addition to other forms of pollution (air, noise), this should be measured with the goal of reducing it. It is a great loss that in Barnet we can no longer see dark stary skies.</p> <p>Barnet’s plan has a duty to conform to the Mayor of London’s plan and the NPPF (see para 180 section c). The plan should specify light quality and installation requirements for the exterior of all buildings, following the guidelines drawn up by the Institution of Lighting Professionals and the Commission for Dark Skies. The plan should measure light pollution and include targets for reducing it.</p>
Historic England	ECC01	<p>We note and welcome new para 10.6.3 which provides helpful detail on potential refurbishment and retrofitting of existing and historic buildings. Similarly, we consider new para 6.27.1 in the supporting text to policy CDH08 to also be helpful in highlighting the challenges of improving energy efficiency of historic buildings without adversely affecting heritage significance. Nevertheless, we consider that it should be made clear (both at para 10.6.3 and clause h) of ECC01) that historic buildings may need different and non-standard interventions to reduce energy consumption and carbon emissions to avoid effects on significance. This should include reference to assessment and understanding of where buildings are currently deficient and that minimal or non-invasive approaches should be the starting point of an iterative strategy.</p>
Barnet Cycling Campaign	ECC01	<p>Climate emergency: The Paris Agreement placed a legally binding commitment on the UK to be carbon neutral by 2050. The Mayor and some neighbouring boroughs’ current vision is now for a carbon neutral London by 2030vii. Barnet also needs to declare a climate emergency and take proportionate and meaningful action to play its part in meeting the 2030 target of net zero for London. Carbon Dioxide emissions in Barnet stood at 3.3 tonnes per capita in 2016. The planned boom in construction to increase the population by 15.3% will increase construction traffic and disruption. The increased population living in these developments require extra services and online shopping deliveries, even if they don’t own a car themselves. This policy ECC01 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 and preserving current ones: speeding up the installation of solar panels: 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. Air and Noise Pollution. As the Local Plan states: Within Barnet, emissions from traffic have the most severe and pervasive impact on air quality and noise pollution. Noise and air pollution from traffic can be mitigated by reducing traffic volumes, by planning trees and vegetation as barriers. 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.</p>
Judy Marcus	ECC01 ECC02 ECC04	<p>The Plan describes a biodiversity metric which purports to access an area’s value to wildlife, helps to determine the impact of local development and therefore informs planning applications. The information on which this is based includes the conditions of each habitat parcel. While this does include air and noise pollution (p204) it does not and MUST include light pollution which has a well documented impact on human and environmental health. “given the</p>

Representor	Section	Summary of Comments
		<p>current urgent need to save energy as our planet warms and evidence that waste light is contributory factor to the rapid decline to biodiversity (www.sciencedaily.com/releases/2018/06/180619122456.htm), we should be urging all administrations both local and national to save energy and reverse biodiversity decline by tackling waste light. (Chapter 3, https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf). Indeed the London Environment Strategy [LES] states (p. 134) :“Urbanisation can also have indirect impact such as...noise and light pollution affecting the ability of wildlife to breed or feed successfully and exacerbating changes to the urban climate caused by climate change” (https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf). Greening the built environment is properly identified as potentially making a significant contribution to climate change mitigation as well as supporting and being closely associated with priority species. [LES, p. 139] Light pollution must be treated as important factor affecting plant metabolism and the health of insect populations which are essential for plants eg pollinators which in turn supports the food growing Strategy (London Plan 2021 Policy G8). The NPPF para 180 section c states the need to “limit the impact of light pollution from artificial light on local amenity intrinsically dark landscapes and nature conservation” the NPPF further requires planning policies and decisions to contribute to and enhance the natural and local environment by minimising impacts on and providing net gains to biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures (para174 (d)). “The Mayor of London has a legal duty* to set out policies and proposals in this strategy relating to natural environment and biodiversity. The GLA is also subject to the ‘biodiversity duty’ which requires all public bodies to have regard to conserving biodiversity as part of their policy development. Decision making and operational activities .” [LES p. 148] [* Natural Environment and Communities Act 2006]. DEFRA’s “UK Biodiversity Indicators” report from 2019 shows that there has been a sharp decline in insect numbers in recent decades, with a 31% drop in insect pollinators between 1980 and 2016 and a 60% decline in the 2,890 “priority” species from 1970 to 2016. Similarly, the National Biodiversity Network’s State of Nature report from 2019 says that “Increases in air, light and noise pollution, human disturbance and predation by domestic animals particularly affect biodiversity in urbanised areas.” [State of Nature Report, p. 31 https://nbn.org.uk/wpcontent/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf] The Mayor of London’s paper on Biodiversity www.london.gov.uk/what-we-do/environment/parksgreen-spaces-and-biodiversity/biodiversity specifically mentions the importance of pollinators e.g. bees. Lepidoptera (of which approximately 90% are moths) should also be recognised as pollinators since they contribute approximately 15% of all pollination. The London Environment Strategy https://www.london.gov.uk/what-we-do/environment/london-environment-strategy also includes protection of priority species. The increasing use of high CCT (blue spectrum) LEDs is extremely harmful and the choice of warm white, 2200K LEDs rather than LEDs in the 2700K – 4000K+ range, is vital. Barnet must also flag up the current legal framework as the statutory nuisance regime limiting the exemptions in section 79(5B) of the Environmental Protection Act 1990 needs to change. Under the current regime people affected by light nuisance from exempt premises can find it difficult to obtain redress. It would also provide much better protection for the bio-environment. If the exemptions were removed, local authorities would have a more effective method of preventing nuisance lighting from these premises. Further, the “best practicable means” defence would give adequate protection for the legitimate use of light for health and safety reasons, and responsible operators already employing “best practicable means” would not have to take additional measures to abate artificial light nuisance. The policy needs to include a specific para/table on Light quality and installation requirements. Public lighting must be dark sky friendly and subject to ‘proof of need’ and operated at the ‘lowest level of illumination’ requirement before installation. Exterior lighting must conform to the following: Institution of Lighting Professionals Guidance Note 1 for the reduction of obstructive lighting 2021: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obstrusive-light-2021 Institution of lighting professionals Guidance Note 8 Bats and artificial Lighting https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/ Commission for Dark Skies (a section of the British Astronomical Assoc) Lighting Guidelines: https://britastro.org/dark-skies/pdfs/CfDS1703_ES_Good_Lighting_Guide.pdf These measures are all easy to adopt.</p>
Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	ECC01	<p>Supportive of the Council’s position to minimise contributions to climate change. However, we note that in some instances due to site constraints such as the historic environment it may not be possible to achieve emission targets on site. Careful consideration needs to be given to particular technologies and their potential for impacts on matters such as the historic environment. A flexible approach is required as to the most appropriate technologies in any particular circumstances or whether a carbon offset payment would be preferable. While it is acknowledged that the objective of developments should be to achieve net zero carbon, policy should not be prescriptive with regard to how net-zero may be achieved. We request that the following point be added to proposed Policy ECC01 (the additions are shown underlined): <u>Flexibility should be afforded to developments which may be constrained by the historic environment, where net-zero cannot be achieved on site, a carbon offset payment would be supported.</u> These changes would ensure that the Publication Local Plan is effective and positively prepared in its delivery.</p>
Isabelle Ficker	ECC01 ECC02 ECC04 CHW02	<p>The Plan describes a biodiversity metric which purports to assess an area’s value to wildlife, helps to determine the impact of local development and therefore informs planning applications. The information on which this is based includes the conditions of each habitat parcel. While this does include air and noise pollution (p. 204), it does not and MUST include light pollution which has a well-documented impact on human and environmental health. “Given the current urgent need to save energy as our planet warms, and the evidence that waste light is a contributory factor to the rapid decline in biodiversity</p>

Representor	Section	Summary of Comments
	ECC06	<p>(www.sciencedaily.com/releases/2018/06/180619122456.htm), we should be urging all administrations, both local and national, to save energy and reverse biodiversity decline by tackling waste light.” (Chapter 3, https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf).</p> <p>Indeed the London Environment Strategy [LES] states (p. 134) : “Urbanisation can also have indirect impacts such, as: ... noise and light pollution affecting the ability of wildlife to breed or feed successfully; and exacerbating changes to the urban climate caused by climate change.” (https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf). Greening the built environment is properly identified as potentially making a significant contribution to climate change mitigation as well as supporting and being closely associated with priority species [LES, p. 139] Light pollution must be addressed as it is an important The Plan needs to include a specific table on Light quality and installation requirements. These requirements must apply to all Minor, Major and Large Scale developments and include all exterior public, commercial and domestic lighting. Exterior lighting must conform to the following : Institution of Lighting Professionals Guidance Note 1 for the reduction of obtrusive lighting 2021: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/</p> <p>Institution of Lighting Professionals Guidance Note 8 Bats and Artificial Lighting https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</p> <p>Commission for Dark Skies (a section of the British Astronomical Association) Lighting Guidelines: https://www.britastro.org/dark-skies/pdfs/CfDS1703_E5_Good_Lighting_Guide.pdf</p> <p>These measures are all easy to adopt and will offer immediate and better protection of the bio-environment and health.</p>
McCarthy and Stone Retirement Lifestyles and Churchill Retirement Living	ECC01	<p>The Council’s commitment to meeting both its and the UK Government’s target of net zero carbon emissions by 2050 is commendable and detailed at length in the justification to Policy ECC 01. The requirement for all major development to be net zero carbon detailed in sub-clause d) of Policy ECC 01 are linked to the corresponding policies in the London – namely Policy SI 2: Minimizing Greenhouse Gases Policy SI 3: Energy Infrastructure.</p> <p>Government has recently finished consulting on interim changes in both Part F and Part L of the Building Standards through the second consultation on The Future Buildings Standards and it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. At present it is expected that new homes built from 2022 will need to produce 31% less carbon emission than the current Building Regulations. Given the Government’s clear commitment and incremental progress towards achieving net zero, the respondents challenge the wisdom of implementing significantly enhanced sustainability measures particularly when balanced against other local plan priorities – for example affordable housing.</p> <p>In the Barnet Local Plan Viability Study (2021) (LPVS) allows for an uplift of between 1.48% to 6.52% of build costs for residential to cover the cost of climate change policies with the latter more representative in their experience of bringing development forward. The LPVS advises that “Where viability is already on the margins, other policy requirements may need to be reduced in order to compensate for these costs. In lower value areas, there may be a need for a trade-off of affordable housing to accommodate the higher climate change costs.” Development typologies where the viability is more finely balanced, such as specialist older persons’ housing, will therefore struggle disproportionately to provide the enhanced sustainability standards and affordable housing. The respondents have consistently stated that the viability evidence underpinning the London Plan was not fit for purpose, particularly in respect of specialist older persons’ housing typologies. The enhanced design and sustainability standards as required in the London Plan are not feasible as the evidence base supporting the policies is not credible. We wish to participate in the hearing sessions. Aspects of the approach detailed in the Local Plan Review are of significant concern and warrant further scrutiny should they not be amended prior to Examination in Public. McCarthy Stone and Churchill Retirement Living would welcome the opportunity to engage and reach agreement on these matters with Council Officers.</p>
Barnet Liberal Democrats	ECC01	<p>We have already commented on our views around over-intensification in some areas of the borough. In addition to requiring green spaces for health and wellbeing, and strengthen communities, we believe there should be specific reference to the need to avoid urban heat islands, and avoiding flash flooding, or overflow into rivers, by designing in, or retaining, green space.</p> <p>Modifications: Include reference to avoiding urban heat islands, and including green space areas to absorb heavy rainwater, which might otherwise cause flash floods, or overflow of drains into waterways.</p>
Barnet Climate Action Group	ECC01	<p>Para 10.3.1 states that the Mayor of London has set a target for London to become a zero-carbon city by 2050, and it is positive to see that London Plan’s proposals are supported by national Government with MHCLG recently stating “Most councils are already taking some form of action. Minister Hughes cited innovative work across the country - including in the capital, where the London Plan includes measures to ensure the environmental ambition of major developments is included at the start of the design process².” Under Policy ECC01 (Mitigating Climate Change), concentrating growth in the identified Growth Areas is supported, as infrastructure is able to be built here to ensure that climate impacts are reduced. However, the policies supporting the Growth Areas (GSS01 through to GSS08) do not specify any requirement around reducing carbon emissions and net zero development. The requirements set out elsewhere in this policy highlight the lack of ambition within the Barnet Draft Local Plan in tackling climate change and reducing carbon emissions. Many of</p>

² Minister Eddie Hughes thanks councils for efforts in tackling climate change, MHCLG Press Release 2 July 2021

Representor	Section	Summary of Comments
		<p>these need strengthening in terms of reducing energy use and reducing carbon emissions in line with the Government's increasing importance for new developments to play their part in not adding to increasing emissions in their local area including:</p> <ul style="list-style-type: none"> • The Planning for the future white paper is clear that transition to net zero should be embedded in the planning system. • From 2025, the Future Homes Standard is to ensure that new homes produce at least 75% less CO2 emissions than homes built now; and also • The NPPF (NPPF) sets out how councils should ensure new developments are not vulnerable to climate change. BCAG recommends that in Policy ECCO1: • Part d) of the policy does not set a proper target for reducing energy use. Meeting Part L of the Building Regulations and London Plan polices SI2 and SI3 is the minimum that is required for any development in London, and the targets set here are already inadequate in terms of meeting the challenges of climate change and reducing carbon emissions. Going 6% beyond Building Regulations for Minor Developments is also an unambitious target for development (and seems likely to fall short of the arrangements set out in the Future Homes Standard). More stringent targets should be introduced to drive better low carbon design. • Part e) should specify that any Decentralised Energy should be low or zero carbon in nature, otherwise there is the risk that developments will be connected to gas fired energy networks. In addition, the council should commission work on the future role of heat networks across the borough to advise developers on where heat networks should be expected and highlighting opportunities for linking in new district heating to existing potential large heat loads (i.e. existing housing, large heat loads such as hospitals, leisure centres, council buildings, education sites etc). • Part f) should highlight that schemes are required to incorporate renewable energy initiatives into development proposals, where feasible, rather than the current encouraged. • Part h) should strengthen the approach to supporting retrofitting existing buildings, as extensive retrofit of existing housing and commercial premises will be needed to achieve net zero by 2050. • Part i) should not simply tie the carbon price to whatever is set by the Mayor of London, but should use this as the minimum carbon offset price, giving Barnet to chance to vary the price according to the evolving (and likely increasing) price of carbon and to use this to encourage more net zero development as the need to further reduce emissions increases in urgency throughout the life of the Local Plan. The reference to 'a contribution' should be changed instead to "Where the Net Zero emissions target for a development cannot be fully achieved, a payment in lieu to achieve the Net Zero standard will be sought..." In addition, the council needs to be much more transparent to residents about carbon offset funds raised through these payments and how these funds are used: at present the council offers little information (the GLA's Carbon Offset Funds: Monitoring Report 2020 (March 2021) highlights that Barnet has collected £51,297 out of a total amount secured by legal agreement with developers of £2,158,942). The council ensure that all development is compliant with the London Plan's Net Zero target and that officers ensure the developers make up any shortfall in carbon emissions savings through carbon offset payments. In addition, there is no mention of stopping the use of natural gas as a fuel source in new development. Building fossil fuelled energy into new development is an approach that locks in carbon emissions for the long term and guarantees that replacement/retrofit will be required in the future. By not adequately addressing the need to reduce carbon emissions from new buildings in the borough, Barnet will be locking in carbon emissions for the long term where these need to be reduced from today. Retrofitting buildings in the future that are planned today is not an effective approach to ensuring we have a net zero borough by 2050 and is not a cost effective approach either. However, this is what will be required if standards are not adequately set in this version of the Local Plan.
Joe Henry	ECC02	<p><i>"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"</i> – the wrong tables are referred to. Table 18 requires: <i>"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."</i> This requirement includes all minor development (including conversion and the provision of one dwelling) which is unreasonable. The Policy needs to be amended to ensure this requirement is not applicable to all residential development.</p>
Peter Piper	ECC02	<p>Mitigating the impacts of air pollutants as set out in ECC02 is mentioned, but there should be clearer statements of how this can be achieved, as well as reference to Barnet's Air Quality Strategy. It is hard to overestimate the importance of this, given that Barnet – with its large and ever-increasing number of older people – was cited as one of the 4 London boroughs with the largest number of air pollution related deaths in 2019. Whilst working as Paediatric Registrar at Barnet Hospital my son, Dr Joseph Piper, became concerned about the number of children presenting with asthma-related conditions (a number of the borough's schools are close to busy roads). Air pollution is known to badly stunt child ling development. With much of Barnet outside the expanded ULEZ, the stated expectation (see 4.26.4) of lower air pollution and noise levels around Barnet's major roads is very, very unrealistic, at least for the next few years. Indeed with the increases in population and economic activity anticipated in this local plan, levels of traffic (especially of large diesel vehicles) will probably increase. The areas of the major developments planned around Brent Cross and the A5 corridor already have poor air quality and it is vital that this is mitigated for the proposed large-scale residential developments there. As Dame Sally Davies emphasised in her Annual Report of the Chief Medical Officer 2018 (Health 2040 – Better Health Within Reach) an important goal must be for individuals to be able to continuously monitor their health and their risk</p>

Representor	Section	Summary of Comments
		<p>exposures. Barnet should - in the very near future - be included in the London Air Quality Network as well as the Mayor's <i>Breathe London</i> real time monitoring of pollution. This would allow its residents, especially those with respiratory problems and those with children, to use the CityAir.app to know when best to negotiate Barnet's pollution hotspots (In accordance with 8.17.2 above). Barnet currently has two air quality monitoring stations, but I see no plans to have more. This is a shame. The costs of continuous, real time monitoring of pollutant levels have lowered dramatically of late, partly as a result of the Mayor's Breathe London initiative (not mentioned anywhere in the Plan). Also under 10.9 Air pollution I propose inserting:</p> <p>"Barnet will aim to be included in the London Air Quality Network as well as the Mayor's <i>Breathe London</i> initiative for real time monitoring of air pollution. Positioning of real time monitoring at sites where air quality is a major concern will allow its residents, especially those with respiratory problems and parents with children, to know (through such sites as the CityAir.app) when best to negotiate Barnet's pollution hotspots."</p>
Barnet Green Spaces Network	ECC02 Para 10.9.8	<p>Para 185 (c) of the NPPF states that development should "c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation." This issue is not addressed by policy within the plan. The All Parliamentary Group for Dark Skies in 2020 produced a report on "Ten Dark Sky Policies for the Government" which outlined some of the problems that light pollution can create including a literature review from Nature magazine in 2018 concluding that: "early results suggest that light at night is exerting pervasive, long term stress on ecosystems, from coasts to farmland to urban waterways, many of which are already suffering from other, more well-known forms of pollution". Add a new section after para 10.9.8 entitled "Dark Sky Barnet and Light Pollution" Text to add including reference to NPPF, Dark Sky policy document from APPG on Dark skies and: <u><i>"The Council aspires to achieve Dark Sky status especially within the area to be designated for the regional park and across other green spaces within the Borough. To achieve this substantial work will be required to reduce levels of existing light pollution across the borough and ensure that new light pollution is eliminated. To this end the Council will prepare a light reduction plan covering the borough."</i></u></p> <p>Add new section F to Policy ECC02: Environmental Considerations <u><i>F) to minimise light requirements externally and ensure that no light pollution is generated. The Council will also implement a light reduction plan across the borough in seeking to achieve Dark Sky Borough status.</i></u></p>
Joe Henry	ECC02A	<p>The LPA consider that a sequential test is required where any part of a site (including land not to be developed) falls outside a flood zone 1 area – this is challenged as being wholly unreasonable because it would restrict opportunities to build dwellings on areas inside flood zone 1, where amenity space may be within a flood zone. The Council justify their position with reference to; "The West London Strategic Flood Risk Assessment" which states in Para 4.2.1, titled 'Application of the Sequential and Exception Test: <i>"Proposed development sites within multiple flood risk zones are classed under the highest Flood Zone present on site. For example, a site that partly falls under Flood Zone 1 and Flood Zone 2 is formally classified as a site in Flood Zone 2. The Flood Zone that each proposed site falls under helps inform the approach needed for the site and the information required for the planning application. The Sequential Test will need to be applied to steer the entire proposed site to the areas with the lowest risk of flooding."</i> The advice contained within "The West London Strategic Flood Risk Assessment" has minimal if not no legal planning status because it is neither plan policy nor adopted local plan guidance. As such the council should not be relying on this advice but the advice contained within the NPPF (NPPF) document and the London Plan 2021. Para 158 of the NPPF states that "new development" (not application sites) should be steered to areas with the lowest risk of flooding. Para 159 repeats the requirement "for development to be located in zones with a lower risk of flooding" Para 163 of the NPPF states that development is not required to provide a sequential and exception tests where it can be demonstrated that: "a) within the site, the most vulnerable development is located in areas of lowest flood risk...." This part of the NPPF is contradicted by The West London Strategic Flood Risk Assessment advice which requires a sequential test even where the development is located in areas of lowest flood risk, if part of the application site is outside Flood Zone 1. The NPPF is clear with its reference to steering development to areas within Flood Zone 1. There is no reference to ensuring the whole of an application site for new development to be wholly within Flood Zone 1. London Plan Policy 5.12 states that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF. "h). <i>Proposals for minor and householder development incorporate SuDS where applicable...</i>" What does this mean? What does "where applicable" mean? "i) <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...</i>" What does "appropriate contributions made to the Council where necessary..." mean?</p>
Barnet Cycling Campaign	ECC02A	<p>The recent flash flooding in London has revealed the very real risks and dangers from intense rainfall which has been exacerbated by over development. We welcome the policy regarding sustainable draining for new developments, such as with verges and tree planting. We urge the council to create policies that protect and enhance existing greenspaces, such as front gardens and establish more green verges and tree planting along the kerbside.</p>
Environment Agency	ECC02A	<p>We fully support Policy ECC02A and its requirements for flood risk, surface water management, water infrastructure and watercourses. We think this aligns with the overarching framework for flood risk and conserving and enhancing the natural environment set out within the NPPF, and is based on evidence (justified) and delivering sustainable development (positively prepared). Part (a) is both positive and pro-active in requiring developments to deliver a positive reduction in flood risk from all sources by giving sufficient consideration to this issue early. We are already seeing the detrimental impacts of climate change on the ability of our rivers, urban landscapes, and drainage systems to cope with these extreme events, with recent events in London, Germany and now in</p>

Representor	Section	Summary of Comments
		<p>China. The Borough has experienced flooding both from surface water and rivers (our records in particular record flooding in 2015 and 2016). Therefore the standard to achieve a positive reduction in flood risk is justified but may need further guidance to set out what is expected to meet this standard. We also welcome the requirements set out in criteria (k) for ensuring there is sufficient capacity for water supply and waste water networks and that upgrades are carried out in time for development. We welcome the strength and clarity of (m) naturalise the watercourse and ensure an adequate buffer zone of at least 10 metres (greater if a tall building is being proposed) and enable public accessibility. <u>We fully support the Borough in stipulating this standard</u> as we are starting to see an unfortunate legacy of past decisions made where developments are in close proximity to rivers, with an increasing number of Flood Risk Activity Permit applications requesting hard engineered solutions for eroded/collapsed river banks because there is no longer enough space to implement a more natural solution. We tend to forget that rivers are subject to the natural processes of erosion and deposition and move through their landscapes regardless of what developments are there, so even where hard engineered solutions are installed, it's likely the erosion problem will simply move further downstream. Therefore we need to start planning for the long-term and the impacts of climate change which we are experiencing now. We hope to find a way of investigating the impacts of river erosion more scientifically via erosion modelling. In addition, we have evidence to show the dimensions (length, width) of the vehicles required to gain access to the buffer zone to undertake works (e.g. emergency repairs, removal of trees and blockages). With vehicle (plant/machinery) dimensions in excess of 7 and 8 metres it's logical and reasonable to expect a minimum of 10 metres. In addition the buffer zone either side of a watercourse is usually designated as functional floodplain (Flood Zone 3b), the area that is most likely to be flooded when a river bursts its banks so it makes complete sense to allow this area to perform its function and flood without the further impediment of development. We support that tall buildings may need greater setbacks given their propensity to overshadow, create light spill (which both can disrupt wildlife and habitats) and with deeper foundations impact the stability of the river bank. We also fully support the following policy criteria: n) Buildings are not sited over the top of new or existing culverts/ordinary watercourses. Culverts conveying fluvial (and surface water) flows are part of a flood risk management infrastructure network. We are seeking the deculverting of watercourses in line with our objectives in the Thames River Basin Management Plan. Ideally we want to see more of the Boroughs watercourses deculverted, opened up and reconnected to their floodplains to increase the Boroughs resilience to flood risk and climate change but also create riverine habitats. Even if this doesn't occur the culvert has to be protected to allow it to be accessed for maintenance (culverts get blocked), repaired and even replaced if there are no other options, so it continues to perform its function without increasing flood risk. We can't accept any buildings proposed over the top of culverts for those key reasons, therefore we welcome this requirement within the policy. Please note we have made some recommendations for minor changes to Table 19, Table 20 and criteria (i) on flood defences.</p> <p>Minor changes as follows:</p> <p>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 protection for the lifetime of development including climate change; and ii) land adjacent to flood defences is protected in order to allow space for flood water in the event of a breach, future replacement of defences and provision of public amenity and biodiversity; Above changes recommended to ensure clear standard that flood defences protect to lifetime of development including climate change and we acknowledge the issue of residual flood risk which is another reason why generous setbacks from flood defences are a sensible measure. <u>Table 19</u> The table has been improved but still has inaccuracies. <i>Proposed development will need to demonstrate application of the sequential test and exceptions test where inappropriate development is proposed in areas of flood risk.</i> The Sequential Test applies even when according to Table 3 of the PPG the development use is appropriate because the initial step should be to steer development to areas of lowest flood risk wherever possible. This is footnoted under Table 3 in the PPG as follows:</p> <ul style="list-style-type: none"> • <i>This table does not show the application of the Sequential Test which should be applied first to guide development to Flood Zone 1, then Zone 2, and then Zone 3; nor does it reflect the need to avoid flood risk from sources other than rivers and the sea;</i> Where Table 3 shows inappropriate development, it states it should not be permitted. Under 'development scale' for this category, although you have taken out minor development the Sequential Test would still applies to those developments that fall between the category of minor and major i.e. non-major developments e.g. 1 dwelling, 2 dwellings and up to 10 dwellings. Also for clarity we recommend the 'development scale' for when FRAs are required states 'All development in Flood Zone 2&3.' Table 20 We support but a water efficiency calculator would be required for the commercial as well as the residential to demonstrate how the water efficiency standard has been achieved.
Environment Agency	ECC02A	<p>We've unfortunately only very recently spotted and discussed the implications of the requirement set out in the L2 SFRA guidance for windfall development i.e. for FRAs to be submitted for sites within the 1% AEP plus 70% for fluvial climate change extent. This directly impacts on the content in the draft L2 SFRA and also Table 19 and Policy ECC02A part C iii in your Local Plan, where it requires FRAs for sites within the <i>1% AEP plus 70% climate change fluvial flood extent</i>. Although it's good that this approach has been proposed and considered, as ultimately it could help discourage development in areas at risk of future flooding, we think this could cause an issue for us particularly in terms of our effectiveness in defending this at planning appeals.</p>

Representor	Section	Summary of Comments
		<p>We have approached our National team before about us providing more bespoke flood risk comments to sites currently in Flood Zone 2 and sometimes in Flood Zone 1 where we know it falls within the 1 in 100 plus climate change extent, and we were advised we should only be giving advice in these scenarios where the applicant is willing to receive it, but ordinarily if a site would normally be covered by our National Flood Risk Standing Advice we should refer the applicant to this. The main concern from nationals perspective is that if we raise objections and it ends up in appeal, then it's unlikely to go in our favour if ordinarily we would have referred to National Flood Risk Standing Advice (FRSA). We are also concerned about the use of 70% climate change extents in particular, as this now massively exceeds the requirements set out by the latest climate change allowance guidance. The corresponding allowance based on the new update is 54%, but in terms of the design flood we are asking for developments to be designed to the central allowance of 17% and only essential infrastructure has to assess the higher central allowance of 27%. We think that in Barnet there could be quite a few areas that fall within the 1 in 100 year plus 70% that are current Flood Zone 2 or 1, and justifying the use of the 70% given the updated guidance is also likely to cause some issues. It may also result in an increase in planning applications needing to be reviewed by us and our resources are not really going in the right direction for that increase in workload at the moment, albeit it might not be a huge increase coming from one borough. We certainly don't want to discourage you from taking a more conservative approach to future flood risk. Requiring the Sequential Test to be provided should still be easily justified as if a site is at risk within the 70% climate change extent, there's still reason to apply the Sequential Test and demonstrate that there aren't alternative sites not at risk. The NPPF paragraphs 161 and 162 already support that approach by advocating a sequential risk based approach taking into account all sources of flood risk and current and future climate change. However we don't think we could review any FRAs in these instances and specifically object/condition these developments. Apologies for our delayed response to this as ideally we would have picked this up during our review of the L2 SFRA. We might be able to explore other options e.g. a form of Local Flood Risk Standing Advice perhaps but the content/efficacy of that advice would need to be discussed and considered. In the absence of any alternative approach though, our recommendation is to stick to what is required anyway via the NPPF and FRSA but remove the requirement for FRAs within 70% extent.</p>
Queen Elizabeth's School	ECC04	<p>The Galley Lane Sports Field Policy ECC04 (Barnet's Parks and Open Spaces) sets out the Plan's support for the provision of sports facilities. This objective is endorsed by the School.</p>
CPRE London	ECC04	<p>We oppose the "low value, low quality" provisions in Policy ECC04 as it has no basis: it is a subjective judgement and, in any event, open and green spaces can be, and in the past have been, improved to deliver important local amenity. Policy should seek to protect and enhance all open, green and play space in the borough with a presumption against development, to ensure the borough can meet the standards proposed now and in future. This element of the policy should be replaced with a strong statement supporting protection and enhancement of all green spaces to meet needs.</p>
Canal & River Trust	ECC04	<p>The Trust supports many of the aims of policy ECC04. We understand that the aspiration to manage and enhance open spaces providing improved accessibility (through point a(ii)) would apply to the Welsh Harp reservoir on the basis that it is designated as Metropolitan Open Land. However, we are surprised that policy ECC04 does not appear to give the council a clear policy mandate for seeking improvements to the quality and accessibility of areas such as the Welsh Harp reservoir through developer contributions. We would suggest that this is reconsidered in order that the council's aspirations under this policy are more capable of being delivered.</p>
Barnet Cycling Campaign	ECC04	<p>This 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. Routes through parks and open spaces need upgrading with wider, hard surfaces for use by cycles and wheelchairs.</p>
East Finchley Community Trust (EFCT)	ECC04	<p>For over ten years the N2 Gardeners have maintained, with the support of TfL a community garden adjacent to the Grade II listed building. This is not currently recognised in the details of Site 24 and should be. New Park for East Finchley: The Trust fully support the proposal by the Friends of Market Place Playground for this new park to help address an area of open space deficiency based on and around the current Market Place area. Extension to Cherry Tree Wood: The Trust fully support the proposals by the Friends of Cherry Tree Wood to extend the Wood to incorporate the end of Brompton Grove.</p>
Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	ECC04	<p>Supporting para 10.19.1 of proposed Policy ECC04 states that "The Schedule of Proposals in Annex 1 highlights new Local Open Space at Whalebones Park which will be designated in accordance with Para 99 of the NPPF [now para 101 of the NPPF updated 20 July 2021]". While Hill and Trustees are fully supportive of the delivery of new publically accessible open space, the site in its current form has no right of public access. Therefore, it goes to follow that the future public open space would only be designated subject to planning permission being granted and following an approved development being built out – this is a key point that the Publication Local Plan should better clarify. On page 290, the reference to "local green space" should be amended to "local open space" to be consistent with other references in the Publication Local Plan. With regard to point a) of proposed Policy ECC04, Hill and Trustees are fully supportive the need to optimize the benefits that open spaces can deliver, ensuring that as well as being family friendly, they consider all users and create a greener Barnet. With regard to point b) ii of proposed Policy ECC04, Hill and Trustees strongly support the Council's position on improving access to open</p>

Representor	Section	Summary of Comments
		spaces, particularly in areas of public open space deficiency identified by Map 7, which as noted above, includes the site. To provide emphasis on this position we request that the following text be added to point b) ii of proposed Policy EC04 (the additions are shown underlined): <u>The Council will seek to work proactively with developers to provide development which enables the provision of new public open space.</u> It is considered that the above changes would ensure that draft local plan is positively prepared and justified.
Barnet VCS Environmental Network.	ECC04	We oppose the "low value, low quality" provisions in Policy ECC04. We should be protecting and enhancing all open space in the borough not allowing development on it. The 'evidence' to justify this policy is out of date, extremely subjective in its judgements and should not be used. We propose removal of this element of the policy.
FORAB	ECC04	This section of the Plan was based on the Parks and Open Spaces Strategy (POSS). Its scoring and weighting methodology was questioned during the public consultation (over 5 years ago) and indeed produced some odd assessments – for example Hadley Wood, perhaps one of the Borough's most precious natural assets, was described as 'low quality and low value'. Following public interventions the Council has modified its stance on two 'low quality, low value' spaces – a proposal to install solar panels in Highland Gardens was dropped and £200.000 has been provided to restore the pavilion in Tudor park. In both case councillors and officers indicated that the POSS assessments were not helpful. Neither the Council nor the public has confidence in the policy in its present form and should not be reflected as the basis for section (e). Section (e) should be re-worded along the following lines: "No green space listed in the Barnet Parks and Open Spaces Strategy should be considered for redevelopment except in exceptional circumstances (i.e. criteria i.-iii)
Barnet Liberal Democrats	ECC04	<ol style="list-style-type: none"> 1. We do not believe that development should be permitted on Barnet's parks and open spaces in areas that are deficient in open space, unless alternative space of equivalent or better quantity and quality can be identified. We do not believe a cash in lieu payment is sufficient in areas that are already deficient in public open space. 2. We do not support development in areas assessed by the Barnet Parks and Open Spaces Strategy as being of low quality and low value, as being a matter of policy. Specifically, the assessment does not take into account whether the park or open space is in an area deficient in public open space. The assessment has been a barrier to investment in those areas in recent years, and has therefore been part of a self-fulfilling cycle of deterioration. We believe the assessment is a signal areas need investment. 3. We believe that open space and green space in areas which are deficient need stronger protection, in line with Barnet's Joint Health and Wellbeing Strategy, and NCL ICP's focus on reducing health inequalities. We believe that people ought to have access to open space/ green space within 1 km of their home as a matter of policy. <p>Modifications:</p> <ol style="list-style-type: none"> 1. We do not believe that development should be permitted on Barnet's parks and open spaces in areas that are deficient in open space, unless alternative space of equivalent or better quantity and quality can be identified. We do not believe a cash in lieu payment is sufficient in areas that are already deficient in public open space. 2. We do not support development in areas assessed by the Barnet Parks and Open Spaces Strategy as being of low quality and low value, as being a matter of policy. Specifically, the assessment does not take into account whether the park or open space is in an area deficient in public open space. The assessment has been a barrier to investment in those areas in recent years, and has therefore been part of a self-fulfilling cycle of deterioration. We believe the assessment is a signal areas need investment. <p>We believe that open space and green space in areas which are deficient need stronger protection, in line with Barnet's Joint Health and Wellbeing Strategy, and NCL ICP's focus on reducing health inequalities. We believe that people ought to have access to open space/ green space within 1 km of their home as a matter of policy.</p>
Sports England	ECC04	Policy ECC04 does not appear to have been amended since the Regulation 18 Draft as a result Sport England's comments previously made are still applicable (with the exception that the NPPF, para 97, is now effectively para 99). These are as follows: "Policy ECC04 does not make any reference to playing fields so it is not clear if playing fields would be addressed by this policy or another community policy or both. Policy ECC04 does, however, broadly appear to seek to enhance and provide provision but there appears to limited reference to protection of existing playing fields/open spaces, including its function. Any enhancement and new provision of playing field should meet the needs and actions identified in the emerging Playing Pitch Strategy Refresh which is not overly clear in this policy or the preceding paras. Sport England would like to note the NPPF, para 97, does specifically seek to protect playing fields (not just pitches) unless certain exceptions are met and this should be reflected in this policy. Sport England would also like to highlight that the Policy ECC04 E does allow loses when not viable but not being viable is not the same as strategically being identified as surplus. This should be amended as it is currently does not align with national policy."
Paul Smith	ECC04	We oppose the "low value, low quality" provisions in Policy ECC04. We should be protecting and enhancing all open space in the borough not allowing development on it. The 'evidence' to justify this policy is out of date, extremely subjective in its judgements and should not be used. The current plan is

Representor	Section	Summary of Comments
		<p>unsound in this respect. Current policy does not plan adequately for the impacts that this population and development increase will have on the open and natural environment. The evidence to support stronger policy is clear and but has not been fully and properly addressed. We propose removal of this element of the policy. • A Regional Park for Barnet based on the Green Belt. (Policy GSS13) This idea has been around for many years but there is nothing specific on how and when it will be delivered. The messages given in the plan on this idea are garbled. o We propose a much clearer statement MUST be included on how this is to be progressed including adding it to the key diagram, proposals map and identifying the resources to create it in the Draft Barnet Infrastructure Delivery Plan.</p> <p>• London became the world’s first National Park City on 22 July 2019. This is not recognised by the plan. London National Park City is a movement to improve life in London working with residents, visitors, and partners to: Enjoy London’s great outdoors more; Make the city greener, healthier and wilder; Promote London’s identity as a National Park City</p>
Barnet Green Spaces Network	ECC04	<p>Para e) of Policy ECC04 seeks to allow limited development on areas that have been assessed by the Barnet Parks and Open Spaces Strategy as being of “low quality and Low value.” The evidence base on which these assessments have been made is unsound, out of date and illogical. Does it relate to 44 or 111 spaces which are shown in different tables in the Study? The judgements made to make these assessments were wrong in 2016 and they are wrong today. Elsewhere in the plan Barnet recognise the value of “all” open space . 8.19.1 <i>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.</i> And again: 8.17.1 <i>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</i> With the Barnet population set to grow by 50,000 people over the plan period, this is not the time to be reducing the amount of open space available. To make policy ECC04 sound and based on evidence para e) i) – iii) should be deleted as should the relevant supporting text at para 10.19.3: First sentence.</p> <p>Para 10.19.4 – 6 inclusive – delete all. Replace this text with up to date support for the value of “all” open space “however small”.</p> <p><u><i>Further supporting evidence on the recognised value of all Green space can be found here:</i></u></p> <p>Public Health England 2020 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to Greenspace_2020_review.pdf</p> <p>New Scientist 2021 https://www.newscientist.com/article/mg24933270-800-green-spaces-arent-just-for-nature-they-boost-our-mental-health-too/</p> <p>WHO 2016 https://www.euro.who.int/en/health-topics/environment-and-health/urban-health/publications/2016/urban-green-spaces-and-health-a-review-of-evidence-2016</p> <p>Warwick University 2019 https://warwick.ac.uk/newsandevents/pressreleases/green_space_is/</p> <p>This is a complex and contentious policy area locally which, if Barnet are not prepared to delete the relevant parts of the policy, needs to be rigorously examined and debated.</p>
Barnet Green Spaces Network	ECC04	<p>We oppose the development of this site for housing on the basis that the policy driver behind the scheme is the misguided notion that this is a site of low value/low quality as set out in Policy ECC04 and which we have made separate representations on elsewhere. The evidence base on which these assessments have been made is unsound, out of date and illogical. The judgements made to make these assessments were wrong in 2016 and they are wrong today. Elsewhere in the plan Barnet recognise the value of “all” open space .</p> <p>8.19.1 <i>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.</i> And again: 8.17.1 <i>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</i> With the Barnet population set to grow by 50,000 people over the plan period, this is not the time to be reducing the amount of open space available. The amendment we seek is the deletion of Site No 32 from the list of developable sites. We would accept a policy proposal to improve the open space and increase biodiversity especially as the site lies long the northern Line a known wildlife corridor. Tied in with the representations we have made on ECC04 this is a site which</p>

Representor	Section	Summary of Comments
		demonstrates the misguided notion of low value/low quality and the unsound judgements that have led and could lead to more open space being lost. This needs to be aired at Examination.
Barnet Society Committee	ECC04 –	This Section of the policy depends entirely on a fundamentally flawed set of assessments in the Parks and Open Spaces Strategy (P&OSS). Its scoring and weighting methodology was challenged during the prior public consultation. Some of its assessments are bizarre: ‘low quality and low value’ spaces included, for example, Hadley Wood – surely one of the Borough’s most precious natural assets. Within the last year, in response to vociferous local objection to certain assessments, the Council has publicly modified its stance on ‘low quality, low value’ spaces. At Highlands Gardens, it has assured residents that development in the form of solar panels would not be considered after all, and at Tudor Sports Ground it has awarded £200k of funding to the restoration of the derelict cricket pavilion. In both cases, Councillors and Officers indicated that the P&OSS assessments were not helpful and needed review. Since neither Council nor public have confidence in the assessments, the policy (in its present form) would command little respect, and its adoption would weaken trust in other policies in the Local Plan. Section (e) should be reworded along the following lines: <i>Green spaces listed in the Barnet Parks and Open Spaces Strategy should be considered for development only under very exceptional circumstances...[criteria i-iii].</i> Yes – because the Barnet Society is familiar with the flaws of the Parks and Open Strategy, having analysed its methodology and assessments in detail during public consultation, and has been involved in subsequent cases when both methodology and assessments have been challenged.
Theresa Villiers MP	ECC04	Barnet Society comments that the assessments carried out under this policy are fundamentally flawed. For example, Hadley Wood is assessed as ‘low quality and low value’. Following local objections to some assessments, both councillors and officers have indicated that the Parks and Open Spaces Strategy assessments were not helpful and needed review. Section E should be reworded along the following lines: No green spaces listed in the Barnet Parks and Open Spaces Strategy should be considered for development.
Queen Elizabeth’s School	ECC05	Policy ECC05 (Green Belt and Metropolitan Open Land) advises that development proposals within the Green Belt will be considered in accordance with NPPF paras 133 to 147. With the publication of the revised NPPF in July 2021, the para references within the policy should be amended to paras 137 to 151.
All Souls College	ECC05	The plan is considered unsound as it does not safeguard land to meet future development needs which could be beyond the current plan period. The future need for housing and other uses such as employment and infrastructure such as a data centre in London may require the review of the Green Belt in sustainable locations. The objection seeks a review of Green belt boundaries relating to land in the vicinity of Bury Farm east of the A41, south of the M1 and west of London Gateway Motorway Service Area. It is proposed that this land (as shown on the location plan) is excluded from the Green Belt and is safeguarded for future development. The scale and uses could be a matter for a future local plan review. <u>Would like to participate at the examination hearings:</u> To explain why the Green Belt should be the subject of a review at Bury Farm to allow safeguarded land to meet future development needs.
Barnet Green Spaces Network	ECC05	The Barnet Green Spaces Network strongly supports policies aimed at protecting all of Barnet’s green spaces. Green Belt and MOL policies and boundaries in the plan have recently been the subject of a review which clearly sets out that the existing designated land meets the relevant criteria for designation and thus should be supported. No change. Others may wish to challenge the validity of current designations and seek changes and reductions in GB and MOL boundaries. If this is the case BGSN would wish to have the opportunity to contest those challenges in examination.
Natural England	ECC06	Natural England welcomes the inclusion in the local plan of a policy for biodiversity. The policy should refer to the benefits to Borough residents from the ecosystem services that being close to nature provides, and outline an expectation that offsite net gain must be sought as close to the development as possible. In some instances this may be difficult, and Natural England recommends that consideration is given to developing a suite of projects that development within the Borough can contribute to, thereby ensuring the biodiversity within the Borough is protected and enhanced. For example, partners that manage Local Nature Reserves and Sites of Importance for Natural Conservation in the Borough could submit projects to the local planning authority to enhance the ecological value of these sites. These projects could be funded by development that requires offsite compensation or additional enhancements to achieve biodiversity net gain. This approach can also be used by development with limited opportunities for biodiversity net gain on-site. The plan’s approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in para 175 of the NPPF. We welcome the planned guidance on how net gain will be applied within the Borough, but advise strengthening this wording within a net gain policy by making provision for a net gain supplementary planning document (SPD). Within this SPD, we would encourage the Council to consider requiring more than a 10% biodiversity net gain, where it can be appropriately evidenced locally that this is required. • Calculating net gain Please be advised that Biodiversity Metric 2.0 has been updated and replaced by Biodiversity Metric 3.0 which was published on the 7th July 2021. We advise that the Biodiversity Net Gain Policy includes this metric to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain.

Representor	Section	Summary of Comments
		<p>Please note that Natural England and Defra are developing an Environmental Net Gain/metric for Natural Capital Net Gain that can be used in conjunction with the Biodiversity Metric (but not instead of). Further information will be available later in 2021. • Monitoring of net gain Natural England advise that your Plan includes requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions. LPAs should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up front information on monitoring will help to streamline the project stage.</p>
Brad Blitz	ECC06	<p>The Draft Local Plan Reg. 19. Makes several references to biodiversity within Barnet, however, there is no mention of biodiversity in the sites set for redevelopment in Hendon, including those that adjoin parks and open green spaces, e.g. site 40 - the Meritage Centre – Middlesex University and the Burroughs, which sits within a conservation area, and an archaeological priority area, and backs onto Sunny Gardens Park (See p. 347). Further, with respect to Hendon, we note the following legal bases:</p> <p>Town and Country Planning (Environmental Impact Assessment) Regulations 2017</p> <p>Public authorities are required to conduct an Environmental Impact Assessment, which includes the information reasonably required to assess the likely significant environmental effects of the development, listed in regulation 18(3), and comply with regulation 18(4).</p> <p>Environmental Information Regulations 2004 (EIR)</p> <p>EIR Reg 12(5)(3), sets out the basis for exempting information, including the requirements of a public interest test.</p> <p>The UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention).</p> <p>Article 5 - Collection and Dissemination of Environmental Information</p> <p>1. Each Party shall ensure that:</p> <p>(a) Public authorities possess and update environmental information which is relevant to their functions;</p> <p>(b) Mandatory systems are established so that there is an adequate flow of information to public authorities about proposed and existing activities which may significantly affect the environment;</p> <p>Article 6 - Public Participation in Decisions on Specific Activities</p> <p>Para 3. The public participation procedures shall include reasonable time-frames for the different phases, allowing sufficient time for informing the public [in accordance with para 2 above' and for the public to prepare and participate effectively during the environmental decision-making.</p> <p>Para 4. Each Party shall provide for early public participation, when all options are open and effective public participation can take place.</p> <p>Para 8. Each Party shall ensure that in the decision due account is taken of the outcome of the public participation.</p> <p>Article 7 - Public Participation Concerning Plans, Programmes, and Policies Relating to the Environment.</p> <p>Each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public. Within this framework, article 6, paras 3, 4 and 8, shall be applied. The public which may participate shall be identified by the relevant public authority, taking into account the objectives of this Convention. To the extent appropriate, each Party shall endeavour to provide opportunities for public participation in the preparation of policies relating to the environment.</p> <p><u>Town and Country Planning (Environmental Impact Assessment) Regulations 2017.</u></p> <p>LBB has not conducted an Environmental Impact Assessment to assess the likely significant environmental effects of the development around sites 40 (page 347), listed in regulation 18(3), and comply with regulation 18(4) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.</p> <p>LBB published a Scoping Report on 2 June 2021, which was recommended by Hardeep Ryatt, Principal Planner - Major Developments on 12 July 2021. This document was signed off by Fabien Gaudin, Service Director – Planning and Building Control on 16 July 2021.</p> <p>The scoping report can be found here: https://publicaccess.barnet.gov.uk/online-applications/files/37CFFD6B4AFF2183A334D4CCD25E59D3/pdf/21_2885_ESC-SCOPING_REPORT-5173347.pdf</p> <p>The determination of acceptability is available here https://publicaccess.barnet.gov.uk/online-applications/files/2CDA83B8A9C3C4FFBE00C9D1DC3D7DF8/pdf/21_2885_ESC-DN_ES_SCOPE_ACCEPTABLE-5221344.pdf</p>

Representor	Section	Summary of Comments
		<p>The scoping report makes one reference to Natural England, but fails to acknowledge the biodiversity of the sites set for development that back onto Sunny Gardens Park and contain mature trees and wildlife habitats.</p> <p>Although the Scoping Report was dated 2 June 2021, it was not available for public consideration until 16 July 2021, and hence there was no opportunity for public consultation. We also note that Natural England was not consulted in the production of this report. Neither the Scoping Report, nor the Local Plan Reg. 19 make any mention of protected species that we know live on those sites including bats, birds, and slow worms, and they offer no specific suggestions as to how LBB will mitigate the effects of development on the natural environment.</p> <p><u>Environmental Information Regulations 2004 (EIR)</u></p> <p>LB Barnet has been withholding information since May 2019, when we first learned of this development scheme. Since then LBB officers have made it exceptionally difficult to engage in meaningful consultation, and to scrutinise plans that we believe will have a significant impact on the natural environment. While EIR Reg 12(5)(3), sets out the basis for exempting information, this must be subject to a public interest test. We now know that a public interest test was conducted after the production of much documentation, including the EIA Scoping Report, and that this Public Interest Test fails to meet the requirements as stipulated in the EIR, and case law (see FTT Greenwich v ICO EA 2012-1022 [Tribunal Reference: EA/2014/0122]).</p> <p><u>The UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention)</u>. LBB does not appear to have updated documentation on the biodiversity of the sites selected for development, otherwise it would surely have appeared in the thousands of pages of reports produced to deliver the proposed development scheme. Thus, we believe LBB may have violated Art 5(1)(a); further we do not believe there is an adequate flow of information within LBB. between the Planning, Governance and Legal Services sections, existing activities which may significantly affect the environment, thus raising concerns regarding a violation of Art 5 (1)(b). Since 13 June 2019, when documents were withdrawn from public consultation during the Housing and Growth Committee Meeting, LBB has been withholding information to prevent effective public participation in decision-making on environmental matters. As a result, we have submitted complaints to the Monitoring Officer, to the ICO and the Aarhus Convention Compliance Committee. We have charged LBB with specific violations of our Convention Rights, including 6 (4), 6(8) Violations of the Convention Article 6(4) include:</p> <p>a. Failing to provide access to environmental documentation, and by insisting on electronic consultations in the middle of the pandemic which disadvantaged older residents, and those without access to internet; and,</p> <p>b. Unlawfully redacting necessary environmental information in the draft Outline Business Case, contrary to EIR</p> <p>Violations of the Convention Article 6(8) include:</p> <p>Failing to take into account the outcome of public participation. LB Barnet has prevented public consultation and scrutiny, including by Natural England, as required by UK regulations regarding adoption of the Local Plan. Further, it has not published Environmental Policies ECC01, ECC02 ECC02A, ECC03, ECC04, ECC05, ECC06, that underpin the Local Plan, Reg. 19 on its website</p> <p>Article 7 - Public Participation Concerning Plans, Programmes, and Policies Relating to the Environment.</p> <p>Violations include:</p> <p>a. Failing to make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, by failing to publish Environmental Policies ECC01, ECC02 ECC02A, ECC03, ECC04, ECC05, ECC06, that underpin the Local Plan, Reg. 19 on its website.</p> <p>On 19 July 2021, a complaint was filed with the Office for Environmental Protection, which is under consideration (CMS-241). The Local Plan Reg. 19 should be modified to take into consideration Environmental Law. This includes: Providing up to date biodiversity information of all sites included the draft Local Plan. This would entail a comprehensive audit of biodiversity in the Borough. Specifically, with respect to Hendon, the Local Plan should include an audit of the biodiversity of site 40 – the Meritage Centre and Church End (Middlesex University and the Burroughs). The Local Plan should include reference to a full Environmental Impact Assessment for each of the sites listed for development, especially where development has already been approved.</p>
Environment Agency	ECC06	<p>We support the changes made to Policy ECC06 to acknowledge Biodiversity Net Gain but think the current policy wording is a bit too general and vague. The Borough could strengthen the policy with the BNG target of 10%. Although it will be mandatory requirement in the amended Town & Country Planning Act, following the Environment Bill's enactment in Autumn 2021, a solid reference to the 10% target would demonstrate the Borough's commitment and endorsement of BNG and it helps prepares applicant's early for the requirement. For example, Watford's Policy NE9.8 Biodiversity (Final Draft 2018-2036) states: <i>New development should seek to achieve an overall net gain in biodiversity. This must be measured through the use of the latest Natural England biodiversity metric. The biodiversity metric should demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site.</i> In addition, Barking and Dagenham's Regulation 19 Local Plan Policy DMNE 3: Nature Conservation and Biodiversity, states: <i>All development proposals are required to (b) demonstrate a minimum of 10% biodiversity net gain using the Defra metric (or agreed equivalent)...</i></p>

Representor	Section	Summary of Comments
		Therefore the target is being endorsed within Planning Policies and in line with best practice. We also think the policy could be strengthened by making it clear that BNG would need to be demonstrated even where development proposals do not result in biodiversity loss, and the normal mitigation hierarchy would still apply where any biodiversity losses are proposed. It's also worth highlighting that the BNG should be delivered on-site, off-site or via statutory biodiversity credits and that the habitat would be secured for at least 30 years via s106 or conservation covenants (in supporting text para 10.26.9 perhaps). Table 20 currently states: <i>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. 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.</i> Our understanding is that the actual calculation to determine BNG would be from the Defra Metric 3.0 which is available for use now. Applicants would need to demonstrate BNG via submission of a Biodiversity Net Gain Plan. Please see our recommendations in answer to question 3 above. We encourage the Borough to clarify and strengthen the wording of Policy ECC06, Table 21 and para 10.26.9.
Mary Dixon	ECC06	Because it does not follow London and national guidance: London Plan (March 2021) Policy G6 B(4) states: "Boroughs, in developing Development Plans, should: seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context" (page 325). NPPG Natural Environment Para 023 states: "How can biodiversity net gain be achieved? Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat" Add to Policy ECC06: <u>Developers should seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context. Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat. These should follow best practice guidance.</u>
Tony Sarchet	ECC06	The final para effectively undermines the stated purpose of the policy in providing a get-out clause for development which will have adverse impacts on biodiversity. There is nothing to suggest that 'mitigation measure' will not become the de-facto norm. I believe this would make the strategy ineffective and in effect undeliverable. Where adverse impacts from development on biodiversity cannot be avoided, planning officers should consult with local community green interest experts and their evidence taken into consideration before a planning application is decided.
Mike Priaulx	ECC06	The Local Plan is not sound because it does not follow London and national guidance: London Plan (March 2021) Policy G6 B(4) states: "Boroughs, in developing Development Plans, should: seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context" (page 325). NPPG Natural Environment Para 023 states: "How can biodiversity net gain be achieved? Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat" Add to Policy ECC06 to follow London and national guidance: Developers should seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context. Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat. Provision of these features should follow best practice guidance.
Barnet Green Spaces Network	ECC06 Policies Map	The plan fails to recognise B-lines, promoted by Buglife as part of the Governments National Pollinator Strategy https://www.gov.uk/government/publications/national-pollinator-strategy-for-bees-and-other-pollinators-in-england One of the B lines in London crosses parts of the Borough including the New Southgate opportunity area. B-Lines are an imaginative solution to the problem of the loss of flowers and pollinators; proposing action at a landscape-scale as advocated in 'The Natural Choice; securing the value of nature'. The loss of wildflower-rich grassland has been well documented; a 97% loss since 1930s which has played a major part in dramatic declines to our native pollinators (e.g. 66% large moths have declined, three quarters of butterfly species are in decline and there have been significant contraction in the ranges of wild bumblebees). The B-Lines networks are promoted as an approach to help restore populations of insect pollinators and to assist with the dispersal and movement in response to climate and wider environmental change. https://www.buglife.org.uk/our-work/b-lines/ To make the plan sound the evidence that is available from HM Government via the Pollinator Strategy and the document "The Natural Choice" should be referenced in supporting text. A new point (f) should be added to the Biodiversity Strategy to the effect that: "f) ensuring that specific and detailed measures supporting pollinators will be required wherever development lies within B-lines in the Borough and in particular for proposals impacting on New Southgate." Add references to B lines and the need to address them in all references to relevant site specific proposals including those in East Finchley and new Southgate that will be crossed by the B-lines. Proposals Map Add b-line extent as indicated on the website https://www.buglife.org.uk/our-work/b-lines/ to the proposals map.

Representor	Section	Summary of Comments
		This is a relatively new policy area that needs a proper hearing.
Thames Water Utilities Ltd)	Table 19	Thames Water supports Table 19 within the draft Local Plan which specifically requires developers to consult with Thames Water and confirm that specific schemes will not increase the risk of sewer flooding to other properties. The table however, refers to large schemes only. We would request that it should be that it should be for minor, Major and Large Scale development to contact Thames Water so that we are able to understand if there will an impact. To strengthen the requirement of the table we would request that additional text is included in Table 19 or the supporting text, which specifically refers to the following: <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>
Thames Water Utilities Ltd	Table 20	Thames Water supports Table 20 and the requirements for all new dwellings to be designed to ensure that a maximum of 105 litres of water is consumed per person per day.
TFL (Spatial Planning)	Chapter 11	We welcome changes made to the introductory text and the more positive emphasis placed on supporting sustainable transport and active travel alongside recognition of improvements planned or underway such as step free access at stations. We are encouraged to see references to the Mayor's and Barnet's mode split targets, ambitions to achieve Vision Zero, proposed transport projects linked to development proposals and the need to retain and improve public transport infrastructure including garages and depots. We note the continued emphasis on encouraging and supporting new orbital travel links and we aim to work with you to achieve this while recognising that many journeys are complex and there is often no clear distinction between orbital and radial routes. It is also the case that historic patterns of development—including that of the road network—will have greater influence on the direction of travel than many other factors. Reference should be made to our Regulation 18 response on this point.
Barnet Cycling Campaign	Para 11.1.1	ADD - and acted upon. We firmly agree with the statement from the London Plan below. This is the essence of what must be achieved to make a habitable city. Please make sure that active travel is always emphasised: 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. Barnet Council will have to make a considerable step change in provision for active travel after decades of under investment. 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.
Brent Cross South Limited Partnership ('BXS LP'),	Para 11.11.4	The para states that "The Brent Cross Growth Area will benefit from new and enhanced bus services including...rapid and orbital bus routes." The specific routing for the rapid transit service has yet to be determined or agreed and there is no funding strategy to deliver it. This should be appropriately and accurately referenced in this para. This para focuses on the public transport interventions associated with the Brent Cross Growth Area; however this area is not just a transitional space or destination or one which would be accessed solely by public transport. People will live and work in this Growth Area and priority must be placed on active travel improvements and integrated infrastructure to support walking and cycling as primary sustainable travel modes.
Brent Cross South Limited Partnership ('BXS LP'),	Para 11.11.7	We support the increased provision of the electric vehicle charging points across new developments in line with London Plan Policy T6, however LBB should also require new developments to provide both active and passive charging for on-street visitor spaces.
TFL (Spatial Planning)	Para 11.12	We welcome positive changes to the wording of this section and further progress in developing parking standards to better reflect the approach taken in the London Plan 2021. However, some of the wording needs to be updated to reflect the more positive approach including in 11.12.6 where reference to 'meeting parking requirements' is inappropriate when referring to maximum parking standards. There should be no minimum requirement for parking as is made clear in London Plan policy T6.1. As expressed in our Regulation 18. response, we have significant concerns about the use of 'orbital PTAL' and so we welcome the more nuanced approach which uses a range of measures of connectivity set out in 11.12.2. However, we would urge you to remove the requirement in 11.12.3 to measure the level of orbital access to determine parking requirements in PTAL 5 or 6. As previously stated, this is not a robust, objective measure and so it 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 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. Furthermore, if the strategic road network, town centres or high streets in an area are configured in a radial direction, it will necessarily mean that buses travel

Representor	Section	Summary of Comments
		in a radial direction to serve and connect local centres for at least some of their route. These services may be vital to residents and should not be discounted based on historical patterns of development.
Brent Cross South Limited Partnership ('BXS LP'),	Para 11.12.10	References to 'bicycles' should be amended to 'cycles' to reflect that not all cycles have two wheels. The London Plan cycle parking standards impose a very significant space requirement on developments. A more flexible approach to cycle parking would be appropriate whereby lower levels could be provided initially with more spaces provided in accordance with demand as monitored through the Travel Plans. Short-stay cycle parking can have a detrimental effect on public realm and should be viewed holistically with non-residential land uses sharing the overall provision flexibility to avoid excessive amounts of on-street cycle parking. This is particularly relevant in town centre locations where linked trips allow for reasonable reductions in short-stay cycle parking.
Brent Cross South Limited Partnership ('BXS LP'),	Para 11.12.2	We support the flexibility to apply local residential parking standards based on local circumstances with a presumption to restrain residential parking through careful car parking management.
Brent Cross South Limited Partnership ('BXS LP'),	Para 11.12.3	This para should be amended as Local Plan Table 23 and the Car Parking Standards Report 2021 states that only sites with PTAL 5 would be required to determine and consider Orbital PTAL in relation to car parking provision. This approach of considering a site's Orbital PTAL is intended to improve orbital bus services within Barnet. It is stated that sites below a certain Orbital PTAL threshold would be required to make financial contributions to TfL to improve orbital bus services. It is questionable as to whether LBB is able to influence TfL allocation of such contributions towards orbital bus services, nor whether TfL would consider such an approach to be a priority for the bus network. This is particularly relevant given TfL's significant concern in use of the Orbital PTAL methodology as per TfL's Regulation 18 representations.
Brent Cross South Limited Partnership ('BXS LP'),	Para 11.12.4	The London Plan does not offer parking standards for all land uses. LBB must offer guidance on the parking standard for these uses or determine how standards should be assessed as part of Transport Assessments.
Brent Cross South Limited Partnership ('BXS LP'),	Para 11.12.5	We support the need for CPZs where parking pressure is identified in residential areas, as well as restrictions on new occupiers obtaining parking permits through legal mechanisms.
Brent Cross South Limited Partnership ('BXS LP'),	Para 11.12.6	We support the acknowledgement that some developments may have difficulty meeting parking requirements and that flexibility will be adopted where public transport and active travel is available. LBB should also make reference to larger scale development in growth areas such as Brent Cross, where phasing of the development means that parking ratios need to be adopted flexibility to deliver early stages of development or across areas with differing levels of accessibility. An overall parking ratio for large masterplans should be adhered to, but with the opportunity to implement different parking requirements across areas of the Site.
Brent Cross South Limited Partnership ('BXS LP'),	Para 11.12.8	The Car Parking Design and Management Plan should be included as a supporting document at TRC01 c) iii). It should also be noted that TfL has not yet published its guidance on Car Parking Design and Management Plan.
Brent Cross South Limited Partnership ('BXS LP'),	Para 11.12.9	It is mentioned that the delivery of car clubs and pool cars as a sustainable alternative can reduce levels of car parking provision. However, the implementation of dedicated off-street car clubs or pool car schemes within developments are costly to operate and maintain and often have limited take-up from residents/employees. The location of the development in terms of PTAL, the proposed car parking provision and the availability of existing on-street commercial car clubs in the vicinity of the development should also be a consideration when assessing the sustainability of new developments. We consider the wording should be amended to also include appropriate allocation of onstreet car club spaces, as these are likely to be more viable than on-site spaces. Whilst we support the provision free membership for car clubs to incentivise their use, careful management and allocation of such incentives to ensure that the benefit remains for the actual household rather than the residents who may move away from the area (e.g. students and short-term renters).
Barnet Cycling Campaign	Para 11.2.1	We endorse this introductory statement and strongly support the investment in orbital links with priority given to active travel.
Brent Cross South Limited	Para 11.2.2	The COVID-19 pandemic has had a significant impact on how people travel, particularly for daily movements such as commuting to work. The pandemic and corresponding restrictions have brought forward changes to travel patterns and attitudes to home working which are likely to be long lasting. The implications of people working more from home may result in lower car usage, for instance for commuting, and the benefit of owning a car could be increasingly

Representor	Section	Summary of Comments
Partnership ('BXS LP'),		outweighed by its financial costs. There has also been a shift towards more active travel to avoid busy and confined public transport systems. It is too early to determine the true and long-lasting effect on Barnet's local transport network, however given the huge global impact COVID-19 has had on travel, a review mechanism and monitoring must be completed as part of the BLTTS which currently plans infrastructure improvement to 2041 as well as completing regular updates of the Strategic Transport Assessment. It is of paramount importance that infrastructure improvements are targeted in the right place following what could be a significant and long-term change to people's travel habits. This approach would ensure that Barnet's policies and strategies do not become ineffective and obsolete as a result of any long-lasting shift in the way people travel.
Barnet Cycling Campaign	Para 11.5.1	Is there a specific target for cycling and walking within the 72% combined target for the borough? There should be.
Barnet Cycling Campaign	Para 11.6.2	The topography of Barnet is not the reason that cycling is only 1% of trips. It is the lack of safe infrastructure, calm roads and secure storage. When cycling policy has been referred to in Barnet Council reports over previous years, there has been a serious lack of commitment to provision that would encourage and facilitate safe cycling, apart from cycle training schemes and cycle parking.
Barnet Cycling Campaign	Para 11.7.1	11.7.1 Promoting Active Travel – off-road and on-road cycle routes will be required.
Barnet Cycling Campaign	Para 11.7.2	Reducing discretionary car use, particularly for short car journeys will be key to improving air quality. Air pollution is thought to have caused 64,000 deaths in the UK in 2015. Improving air quality near schools is vital but how does the council intend to improve air quality in general outside the NCR?
Barnet Cycling Campaign	Para 11.7.5	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.
Barnet Cycling Campaign	Para 11.7.7	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. School Travel Plans need to consider suitable school uniforms. A blazer, collar and tie and long trousers are not ideal cycle clothing. 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.
Barnet Cycling Campaign	Para 11.8.3	and by comprehensively tackling the school run. ADD, ensuring that school travel plans include ambitious targets for walking and cycling.
Barnet Cycling Campaign	Para 11.8.5	Freight logistics via cargo bike for last-mile deliveries can make a significant contribution to the transport network and environment.
Barnet Cycling Campaign	TRC01	<p>The policy should clearly state the aim to enable as well as promote. Promotion can only succeed where sustainable transport modes are truly accessible to all residents. This would mean a commitment to deliver a safe and attractive walking and cycling Network. The positive policies such as "attractive and an accessible cycle links especially in development areas" and "good quality walking surfaces and off-road cycle routes" and the adoption of the Healthy Streets approach are all welcome, these should not be confined to development areas. These improvements will have a greater impact on modal shift if they are accompanied by further measures to make active travel safer, easier and cheaper than using the car.</p> <ol style="list-style-type: none"> 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 and removing on street parking from key routes in the borough where it obstructs buses or the development of strategic cycling routes. 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. Develop a programme to promote people to cycle their daily journeys, help them to get a bike, provide storage for it and teach them how to maintain it. 7. 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: - <ul style="list-style-type: none"> ◦ Build 50% of the prioritised strategic cycling corridors (as identified in TfL's Strategic Cycling Analysis) by 2024 and 100% by 2030.

Representor	Section	Summary of Comments
		<ul style="list-style-type: none"> ◦ Match other boroughs and TfL by moving to a general 20 mph speed limit. <p>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 e-bike hire within the Borough</p> <p>10. Improvements to Pedestrian experience with pavement widening, continuous footways, more zebra crossings and improved timings for signalled pedestrian crossings]</p>
Hill Residential Ltd & Trustees of The Gwyneth Will Trust & Trustees of The Gwyneth Cowing 1968 Settlement	TRC01	Supportive the overall thrust of proposed Policy TRC01 which promotes sustainable transportation.
Regal JP North Finchley Ltd	TRC01	Policy TRC01 deals with sustainable and active travel. Criteria bii states that the Council will “Refuse proposals that have a negative impact on highway safety or on the road network that cannot be appropriately mitigated”. This wording is not consistent with para 111 of the NPPF which recognises that some impacts may be acceptable and only where impacts are ‘unacceptable’ or ‘severe’ should that result in refusal on highway grounds. The policy should be updated accordingly. Similarly criteria ci of Policy TRC01 states that for all major development the Council will require “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”. Para 111 of the NPPF is clear that only where highway impacts are ‘unacceptable’ or ‘severe’ should permission be withheld. Indeed the NPPF anticipates that there may be instances where there will be highway impacts but they may be considered to be acceptable when assessing the benefits of a development. As a result it is not necessarily appropriate for a Transport Assessment to mitigate ‘any negative impact’ and the wording should be amended accordingly.
Barnet Liberal Democrats	TRC01	<ol style="list-style-type: none"> 1. We believe that it should be policy to build a planned, connected network of cycling routes, alongside a policy to allow ancillary cycling infrastructure (such as bike sheds and bicycle parking). 2. We believe that supporting active transport needs to include thought for pedestrians, including 20 mph speed limits, safe pavements, benches and (as already mentioned) public toilets. 3. We believe active transport is a way to support local economies, improve health and wellbeing, strengthen community feeling and tackle climate change. We would support specific reference to equalities issues, in particular accessibility for women and girls, as well as older and disabled people, as we believe that structures that work for them (as primary users of public transport and active transport) will improve the borough for everyone. <p>Modifications:</p> <ol style="list-style-type: none"> 1. We believe that it should be policy to build a planned, connected network of cycling routes, alongside a policy to allow ancillary cycling infrastructure (such as bike sheds and bicycle parking). 2. We believe that supporting active transport needs to include thought for pedestrians, including 20 mph speed limits, safe pavements, benches and public toilets. <p>We believe active transport is a way to support local economies, improve health and wellbeing, strengthen community feeling and tackle climate change. We would support specific reference to equalities issues, in particular accessibility for women and girls, as well as older and disabled people, as we believe that structures that work for them (as primary users of public transport and active transport) will improve the borough for everyone.</p>
Hammerson UK Prop and Aberdeen Standard Investments	TRC01	Policy TRC01 deals with sustainable and active travel. Criteria bii states that the Council will “Refuse proposals that have a negative impact on highway safety or on the road network that cannot be appropriately mitigated”. This wording is not consistent with para 111 of the NPPF which recognises that some impacts may be acceptable and only where impacts are ‘unacceptable’ or ‘severe’ should that result in refusal on highway grounds. The policy should be updated accordingly. Similarly criteria ci of Policy TRC01 states that for all major development the Council will require “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”. Para 111 of the NPPF is clear that only where highway impacts are ‘unacceptable’ or ‘severe’ should permission be withheld. Indeed the NPPF anticipates that there may be instances where there will be highway impacts but they may be considered to be acceptable when

Representor	Section	Summary of Comments
		assessing the benefits of a development. As a result it is not necessarily appropriate for a Transport Assessment to mitigate 'any negative impact' and the wording should be amended accordingly.
Brent Cross South Limited Partnership ('BXS LP'),	TRC01	<p>We support the broad aim of Policy TRC01 to "deliver a more sustainable transport network ... by reducing car dependency, encouraging sustainable modes of transport and improving air quality". However, the following representations are made:</p> <p>TRC01 a) iii) ensures developments seek "opportunities for improvements to the wider walking and cycling environment", however this must only be applied when there is clear requirement which passes the three S106 tests:</p> <ol style="list-style-type: none"> 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. <p>TRC01 b) i) advocates support for delivery of new transport infrastructure identified in Policy TRC02 and the BLTTS. However, Policy TRC02 predominantly focuses on public transport infrastructure delivery and does not clearly set out measures that will be taken to promote walking and cycling within the Borough. This is considered a missed opportunity to promote two modes critical to achieving LBB's modal shift objectives and policy objectives relating to air quality and public health.</p> <p>TRC01 b) iii) does not make reference to Mayor's Vision Zero agenda and should be amended as follows: "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 to include speed reduction initiatives to support the Mayor's Vision Zero commitment; and" TRC01 b) iv) stipulates that the Council will "promote orbital travel improvements where appropriate"; however, Policy TRC01 does not reference these improvements, and it is not clear what steps will be taken to address this identified issue and further clarity on what constitutes "appropriate" should be set out in this policy. TRC01 c) iii) A Car Parking Design and Management Plan should also be included here as a supporting document submitted for all applications with car parking as mentioned in Para 11.12.8.</p>
TFL (Spatial Planning)	TRC01	As stated in the Regulation 18 response, we welcome the Council's commitment to active travel improvements and implementing the Healthy Streets Approach as well as the requirement for assessments and plans to show how they are contributing to meeting mode split targets.
Roger Chapman Ramblers Herts & North Middlesex	TRC01	<p>Amend - The Council will work to deliver a more sustainable transport network that supports a growing population and prosperous economy by promoting active travel 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 :</p> <ol style="list-style-type: none"> Promote active travel requiring all developments to address the needs of cyclists and pedestrians by ensuring : <p><i>NB Include struck out wording in supporting text.</i></p>
CPRE London	TRC02	no mention of shared mobility hubs or space for cycle infrastructure. This policy should include specific provision to reflect the spatial needs of a move to active travel and shared and electric mobility; as well as a move to consolidated goods delivery.
Barnet Cycling Campaign	TRC02	<p>The plan recognises the need to invest in public transport lines and interchanges and we support investment in orbital and radial public transport. 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.</p> <ol style="list-style-type: none"> Support more bus lanes and the introduction of bus gates in healthy streets neighbourhoods to make bus journeys more efficient than car journeys. Develop area-wide healthy streets neighbourhoods (low traffic neighbourhoods) to cover the entire borough by 2030 - it is not sufficient to confine healthy streets to new developments and occasional public realm schemes. Provide secure residential cycle parking [eg: cycle hangars] and cycle hubs. Planners should 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. Secure cycle storage / stands should be provided near key bus stops to enable mode sharing. Cycling a short distance and then catching the bus/train to travel further is particularly useful for longer or hilly orbital journeys [eg Routes 251, 10, 307]. Improve Pedestrian routes to public transport hubs, such as by ensuring all stations have proper pedestrian crossings on their main approach roads [Totteridge & Whetstone, New Barnet and Brent Cross are examples of stations lacking that].
FORAB	TRC02	These comments link to our comments on policy GSS09 This policy fails to disguise the paucity of improvements to transport capacity. Of the eight measures listed in (i) to (viii) five are merely improvements at interchanges and the last is meaningless. Whilst interchange improvements might be welcome they could be counter-productive if the trains and buses cannot cope with any extra traffic they generate. The only indications of improvements to capacity are the West London Orbital, which will only serve one corner of the Borough, and Crossrail 2 which is most unlikely to be delivered over the lifetime of this Plan. Over the past 20 years the population of the Borough has increased by some 50,000 with only modest increases in train capacity on the four north-south rail routes.

Representor	Section	Summary of Comments
		But between 2010 and 2017 alone the number of people entering and leaving High Barnet Station for example increased by some 50%. Rail capacity and predicted demand should be fundamental to any transport plan for the Borough but are absent from this part of the Plan. So services already stretched will have to cater for the additional traffic arising from a further 50,000 increase in the population. The transport plan and identification of infrastructure and service improvements needed should be informed of an assessment of current and future demand and capacity to deal with that.
Hendon Goods Yard Village Ltd	TRC02	Para A(iv) Our client supports the inclusion of upgrades to Hendon Station under Draft Policy TRC02 (para A(iv) – in seeking to help facilitate growth, as set out under Draft Policy GSS09 (i.e., intensification of housing at Hendon Station). This is in line with the strategic objectives of the NPPF Para 104 and is considered sound on this basis.
Brent Cross South Limited Partnership (‘BXS LP’),	TRC02	One of the key objectives of the Local Plan is to improve sustainable travel options including walking and cycling. However, the new infrastructure set out within Policy TRC02 is focused primarily on public transport delivery and does not clearly set out measures that will be taken to promote walking and cycling within the Borough. A list of key projects to enhance walking and cycling should be included as part of Policy TRC02.
TFL (Commercial Development)	TRC02	Our colleagues in TfL Spatial Planning will comment on this draft policy. However, consistent with our comments above in respect of Colindale station, we would suggest that a)iii is amended as follows: <i>A new underground station ticket hall building and enhanced public transport interchange at Colindale;</i>
TFL (Spatial Planning)	TRC02	As stated in the Regulation 18 response, we welcome the Council’s support for delivery of new and enhanced transport infrastructure. It would be helpful to confirm that where appropriate, development proposals will be expected to facilitate and contribute to the delivery of this infrastructure. We welcome the addition of a commitment to identifying and protecting land for enhancing rail capacity although this could usefully be expanded to refer to public transport capacity so that it included bus garages and standing facilities. We suggest that point iii refers simply to an ‘upgraded and enlarged Colindale Underground station’ and that point iv refers to a new London Overground passenger rail line.
Joe Henry	TRC03	<i>“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”</i> But local residents / councillors can currently block a CPZ – have the rules changed? <i>“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.”</i> This is wholly unreasonable, and the policy does not give any justification for these restrictions. The policy does not comply with London Plan Policy T6 (Car parking). This policy only seeks to restrict car parking <i>“in line with levels of existing and future public transport accessibility and connectivity.”</i> There are many parts of Barnet which have CPZ’s but don’t have a high PTAL rating. This policy at best should only be applicable to PTAL 5-6 areas. Many parts of the borough have poor public transport options going in northerly, easterly and westerly directions, especially northerly. In some areas public transport in a northerly direction is either very poor or close to non-existent. Developments in areas which do not have a very good PTAL rating could become unviable because of the devastating impact on sale values resultant of not having the ability to have a car in area which is not highly accessible. This policy would deter families from buying or renting family sized dwellings in areas which are not highly accessible. The policy does not deter off street car provision for developments but seeks to punish developments that provide car free development in areas where there is sufficient on street car parking provision. This cannot be right. The policy could be interpreted as allowing access for car parking permits for developments which provide some off street car parking (no matter how small the provision). <i>“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.”</i> This is massively onerous for small developments including the loss of one car parking space, unless the council agree to use common sense and allow photos to be provided to demonstrate sufficient on street car parking rather than a full car parking survey (which costs more than £1,000). <i>“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.”</i> The current wording makes this part of the policy a requirement for all development. This should not be applicable for minor schemes.
Friern Barnet & Whetstone Residents’ Association	TRC03	TRC03 is unsound as it fails to set out the requirements to apply where parking would not be provided in accordance with Table 23. Para 11.12.6 states that in certain situations the Council will show flexibility in the assessment of parking requirements, but this is not actually dealt with in the Policy TRC03 itself, where there is no CPZ. Likewise, the policy requirements to apply within an existing CPZ are not set out in the Policy. We assume that this "flexibility" will take the form of continuing to allow the Borough's streets to be used as overflow parking for developments with no or inadequate on-site parking. In relation to paragraph d), the wording is unsound as 1) the para currently only applies where proposals involve a reduction of existing off-street car parking spaces the term "local needs" lacks precision.
Friern Barnet & Whetstone	TRC03	Amend d) to read - Where development proposals <u>do not provide parking in accordance with Table 23</u> or 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 (<u>including the needs of both residents and visitors</u>).

Representor	Section	Summary of Comments
Residents' Association		
Home Builders Federation	TRC03	We note the requirement for compliance with the London Plan's requirements for electrical vehicle charging points. The Council should clarify how use of use of energy from electrical vehicle car-parking points will be paid and apportioned among residents in apartment schemes and how this will be apportioned among the flats. Residents who do not own electrical vehicles, should not be required to pay for the energy consumed by those who do. Presumably, this will be paid for by card. It would be helpful if the Council could clarify its expectations in this area.
CPRE London	TRC03	<u>Parking standards are too high: one third of Barnet households currently do not own a car and the council should be looking to reduce this further in line with transport strategy.</u> There should be a presumption in favour of zero car or 'car lite' (0.3 spaces for household) development as per the London Plan and no requirement for developers to provide the high levels of parking stated which will encourage private car ownership and in direct contradiction of the need to reduce private car use. Instead there should be a presumption in favour of public transport, walking and cycling. In areas of low PTAL, developers can work with car clubs to ensure availability of shared cars. The council can also ensure there is suitable cycle infrastructure and work to improve PTALs/public transport. <u>Introduction of Controlled Parking Zones and potential impact on front gardens:</u> We propose a new policy opposing use of front gardens for car parking as well as opposing any new Domestic Footway Crossovers, to underpin a move to sustainable modes of transport. This is particularly important to support the introduction of Controlled Parking Zones, which are a vital tool to reduce car trips, but which might encourage householders to park in their front garden to avoid costs and controls, which would remove the ability of the council to effectively manage parking and also create an unattractive and dangerous streetscape. <u>Promote car share as an alternative to car ownership.</u> It is essential to define policies which will promote car share as a means to reducing private car ownership in line with the London Plan.
Barnet Cycling Campaign	TRC03	This policy focuses on what's allowed in new developments but needs to extend borough wide. It needs to support policies ECC01, TRC01 and TRC02 to discourage private car use and favour active travel. We support the policies listed <ol style="list-style-type: none"> 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. Enforcing the ban on pavement parking. 5. The policy for electric charging points [f] should ensure that charging points do not take away any pavement space or create trip hazards. Barnet's preference for lamppost charging is better than the large on-pavement chargers seen in other boroughs. Even better would be to put the chargers in the roadway or confine to off-street car parks. 6. Providing car club vehicle parking where appropriate [g] 7. Restricting the type of vehicles 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 Planviii (rather than the increased levels proposed in Table 23).
Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	TRC03	TRC03 reverts to the London Plan standards, except in the case for residential development which it expects parking in accordance with Table 23 which sets out residential car parking standards. We consider that a flexible approach should be applied to residential parking and should be balanced out with regards to the site specific circumstances, having regards to Table 23 and the London Plan standards. To provide emphasis on this position we request that the following text be added to proposed Policy TRC03 (the additions are shown underlined): <u>As it relates to residential car parking, regard should be given to the specific site and location constraints (and any other relevant matters including the proposed design), Table 23 (Residential Car Parking Standards) and the London Plan.</u> This above change would ensure that the proposed policy conforms with London Plan Policy D3 (Optimising site capacity through the design-led approach) which seeks to maximise the capacity of sites through a flexible design-led approach. These changes would ensure that the Publication Local Plan positively prepared and consistent with national policy.
Landsec	TRC03	Landsec welcomes Draft Policy TRC03 seeking car parking for non-residential uses, electric vehicle charging points and cycle parking for all uses in accordance with the London Plan standards. With regard to car parking for residential uses, Landsec agree that the maximum car parking standards set out in Table 23 should be applied to each site with sensitivity to local circumstances, including parking stress, ownership of surrounding areas, and location and proximity to local services, in accordance with Supporting Para 11.12.2. Landsec welcome acknowledgment that 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, set out in Supporting Para 11.12.9. Landsec welcome the confirmation that up to 0.5 spaces per dwelling is to be allowed for developments within Opportunity Areas but consider this should be extended to the other locations identified for housing growth under Draft Policy GSS01 including Major Throughfares.

Representor	Section	Summary of Comments
Barratt London	TRC03	Barratt London welcome the revision to the wording of Policy TRC03 part b) with regards to Controlled Parking Zones (CPZ). The inclusion of new wording ' <i>if it is deemed a CPZ is necessary...</i> ' enables flexibility in the application of the policy so as not to hinder development – we are supportive of this.
Brent Cross South Limited Partnership ('BXS LP'),	TRC03	<p>Policy TRC03 states that “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.” The London Plan does not offer parking standards for all land uses. LBB must offer guidance on the parking standard for all uses or determine how standards should be assessed as part of Transport Assessments. This should be addressed in this policy and is linked to Para 11.12.4. The London Plan maximum standards for retail uses (London Plan Table 10.5) do not consider that customer car parking is essential for the viability of large format food retail uses where customers are collecting large and bulky items. Large foodstores can also form key anchors within town centres and this policy could inhibit the redevelopment of such uses which play an important role and function in attracting people to town centres. It should be made clear in Policy TRC03 that London Plan Policy T6.3 Part G does allow for flexibility in applying the retail car parking standards when they could adversely affect a town centre’s vitality and viability. The London Plan maximum standard for office uses at outer London Opportunity Areas is 1 space per 600 sqm GIA, however the Section 73 maximum standard for BX Town is 1 space per 300 sqm GIA. Whilst the maximum standard at BX Town is more generous than is prescribed by the London Plan, BXS LP is still experiencing difficulties with prospective office occupiers requiring much greater levels of car parking at around 1 space per 166 sqm GIA. This highlights the clear disparity between office occupier requirements for car parking and the difficulties in attracting ‘statement’ occupiers to outer London locations which are not yet established neighbourhoods or town centres. Flexibility and the need to provide adequate office parking to ensure the vitality and viability of town centres should be incorporated into the Local Plan. Furthermore, the London Plan does not provide sufficient clarity on appropriate car parking for leisure uses, outdoor amenities such as parks and sports pitches, or event requirements. These limitations of the London Plan policies should be noted in Policy TRC03 and LBB must offer guidance to developers on appropriate car parking provision for such uses. We consider the wording of Policy TRC03 a) should be amended as follows: “The Council will expect residential development to provide parking flexibly and in accordance with Table 23.” See responses above to Para 11.12.2 and Para 11.12.6 As regards Policy TRC03 b), we consider that, where CPZs are deemed necessary to mitigate a development, it is not reasonable to allow for the CPZ to be implemented prior to occupation. Given that CPZs are subject to time-consuming, and possibly unsuccessful, public consultation exercises; the approach set out would significantly fetter the commencement of construction for developments under such restrictions. Developers are unlikely to commence construction of an approved development at risk pending successful implementation of a CPZ. Furthermore, such policy would significantly conflict with London Plan Policy T6 Part C which states that “An absence of local on-street parking controls should not be a barrier to new development” – Policy TRC03 b) would be a significant barrier to new development. We consider the wording of Policy TRC03 b) should be amended as follows: “A developer contribution towards the implementation and monitoring of new or amended CPZs will be agreed as part of the planning permission for developments which could generate overspill car parking on local streets.” We consider the wording of Policy TRC03 d) should be amended as follows: “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 or agree to a developer contribution towards the implementation and monitoring of a new or amended CPZ”. Policy TRC03 e) “Cycle parking is to be delivered in accordance with London Plan Standards set out in Policy T5 Cycling.” The London Plan cycle parking standards impose a very significant space requirement on developments. A more flexible approach to cycle parking would be appropriate whereby lower levels could be provided initially with more spaces provided in accordance with demand as monitored through the Travel Plans. Short-stay cycle parking should be viewed holistically with non-residential land uses sharing the overall provision flexibility to avoid the public realm being detrimentally impacted by excessive amounts of on-street cycle parking. This should be addressed in this policy and is linked to Para 11.12.10. We consider the wording of Policy TRC03 g) should be amended as follows: “Spaces should be available for on-street car club vehicle parking along with car club membership for future residents of the development within the agreed car parking provision, taking into consideration existing car club provision within the vicinity of the development.” See response above to Para 11.12.9.</p>
TFL (Commercial Development)	TRC03	We note that Table 23 (Residential Car parking Standards) now broadly accords with the London Plan. We welcome the changes to TRC03 para b) following our Reg 18 representations in respect of CPZs. However, we consider that the text should be clear in respect of who decides whether a CPZ is required. In addition, the introduction of a CPZ does not fall within the control of a developer and this objective has to be driven and promoted by the Council. Therefore, we suggest the following amendment to reflect this: <i>Where development is proposed, and the Council decides that it is deemed a CPZ is necessary then the developer will need to make a contribution towards the implementation and monitoring of the CPZ in order that the Council can seek to ensure that it is should be in place within the surrounding area of the development before occupation. A The developer contribution towards the implementation and monitoring of the CPZ will be agreed as part of the planning permission.</i>
TFL (Spatial Planning)	TRC03	We welcome the changes to Table 23 which is now broadly in line with Table 10.3 in the London Plan 2021. We note that the standards in Table 23 differentiate between 1 – 2 bed and 3+ bed units in most areas and set a lower maximum for 1 – 2 bed units in PTAL 0 – 1 than the London Plan. This is

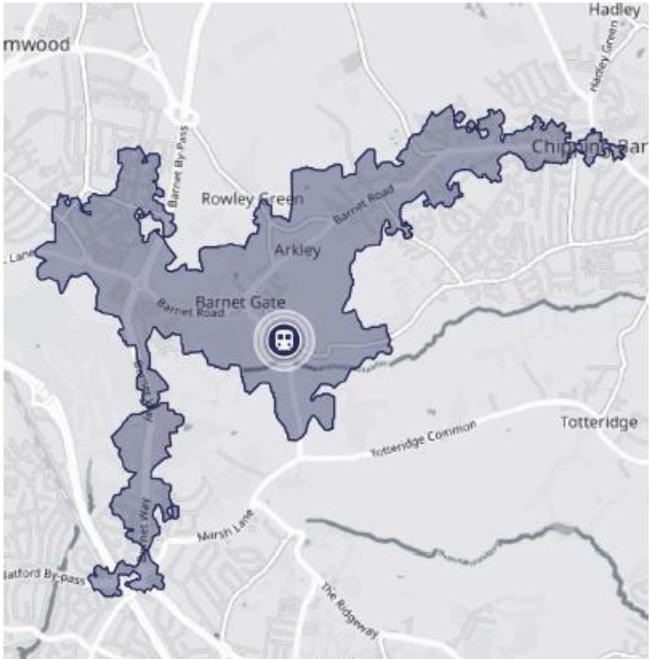
Representor	Section	Summary of Comments
		consistent with the footnote to Table 10.3 in the London Plan which states that 'Where development plans specify lower local maximum standards for general or operational parking, these should be followed.' We welcome the footnote which has been added to Table 23 requiring residential development in 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. The residential parking standards are now in conformity with the London Plan. We welcome the requirement that 'Cycle parking is to be delivered in accordance with London Plan Standards set out in Policy T5 Cycling' and we welcome the addition of a reference to the London Cycling Design Standards (LCDS) in 11.12.10 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 should count towards the maximum allowed). This is to avoid car clubs creating additional vehicular dominance and to ensure that car clubs are made viable.
Clarion Housing Group and the Huntingdon Foundation	TRC03	TRC03 is considered in unsound on the basis of NPPF (2021) Para 35; on the basis it is not considered to be effective. Draft Policy TRC03 states that the Council will expect residential development to provide parking in accordance with Table 23. The supporting text in relation to Table 23 notes that a maximum standard of 0.5 vehicle spaces per dwelling will be allowed for developments within Opportunity Areas. The vehicle parking standard applicable to Opportunity Areas should be explicitly set out in Table 23 and the supporting text. The Draft Policy TRC03 and supporting text need to make it clear, to ensure soundness and be effective, that the parking standards set out in Table 23 are maximum standards and should not be exceeded to comply with the central aim of the NPPF (2021) and London Plan (2021) which seek to achieve sustainable development. Draft Para 11.12.5 states: "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". No details on the 'appropriate levels of car club and visitor parking' are set out in the Draft Local Plan or Draft Policy TRC03. Draft Policy TRC03 states "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". The LB Barnet Car Parking Study (2019) and the LB Barnet Parking Standards Review Phase 4 Technical Note (2021) which form part of the evidence base for the Draft Local Plan fail to quantify an appropriate level of car club and visitor parking. We consider reference to car clubs and visitor parking should be omitted from the supporting text and Draft Policy TRC03. The reference is unjustified and unsound in the context of NPPF (2021) Para 35; it is not based on proportionate evidence and cannot be effectively delivered. Draft Policy TRC03 should be updated to explicitly reference the residential vehicle parking standards set out in Table 23 are maximum standards and that a lower maximum standard will be applied in relation to site located within Opportunity Areas. Draft Policy TRC03 (a) should be updated to state: "New residential development must not exceed the maximum vehicle parking standards set out in Table 23. Lower maximum standards will be applied in relation to sites located within Opportunity Areas and Growth Areas (0.5 vehicle spaces per dwelling)". Draft Policy TRC03 (g) should be omitted on the basis reference to car club vehicles is unjustified in the context of the supporting evidence base.
CasaBella Developments	TRC03	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 and other amenities such as social infrastructure and open spaces. 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. Furthermore, the policy should acknowledge (as per the London Plan) that development within and in close proximity to town centres "generally have good access to a range of services within walking distance, and so car-free lifestyles are a realistic option for many people living there".
Barnet Cycling Campaign	TRC04	This 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.
Elizabeth Silver and 18 Co-Signatories	Table 21	Unsound : Ambiguity contrary to NPPF 2021 para 16d The sentence allowing an offsite contribution to Biodiversity Net Gain (BNG) can be used as a loophole. This is because the contribution may not be visible to local residents ('offsite' could mean a long way away) or could be on existing Green Belt land which should be planted on anyway. Wildlife rules 'too easy to manipulate' by builders News The Times July 27 2021 "Independent scientists examined the plans and told <i>The Times</i> they detected multiple flaws. They concluded the plans could not be trusted to deliver the government's pledge. The central problem is that developers plan to destroy or damage wildlife sites now with a promise that compensatory habitat will be created and maintained over the next 30 years. Some plans rely partly on allocating biodiversity value to gardens of homes that will be built even though developers cannot guarantee what happens to those gardens, which could be paved, have artificial lawns or large outbuildings. Promises are also made to enhance small pockets of land within

Representor	Section	Summary of Comments												
		<p>sites but they will be surrounded by thousands of new residents and their cats and dogs, meaning wildlife may struggle to survive.” In addition, the BNG may be an unreliable metric if certain biodiverse habitats are undervalued (21 July 2021) New biodiversity algorithm ‘will blight range of natural habitats in England’ Biodiversity The Guardian</p> <p>To make this Table Sound and remove ambiguity, add these to Table 21: Para 1: Add: “BNG must be informed by the best ecological information available. Care must be taken that the BNG metric does not undervalue the habitat in question.” Para 2: Add: “Offsite contribution must be within 0.5 km of the site in question, and not be taken from existing Green Belt or Metropolitan Open Land.”</p>												
Brent Cross South Limited Partnership (‘BXS LP’),	Table 23	<ul style="list-style-type: none"> • Symbol ^ can be omitted. • Footnote for # should clarify what “higher density or in more accessible locations” means to avoid ambiguity. • Footnote “~With the exception of disabled persons parking, see London Plan Part G Policy T6 .1 Residential parking.” This should reference that this relates to the London Plan. 												
LB Brent	Table 23,	<p>LB Brent commented on this previously noting that parking standards in low PTAL were relatively high compared to the draft London Plan. LB Barnet’s Reg 19 draft Plan has reduced its standards consistent with London Plan’s maximum car parking provision for an outer borough. It is noted that LB Barnet has added a footnote to table 23 that states that ‘Metropolitan and Major Town Centres to be Car Free~; and Up to 0.5 spaces per dwelling be allowed for developments within Opportunity Areas’. Colindale Opportunity Area has a PTAL of 3-4. Cricklewood Opportunity Area has PTAL 4-6a. In Brent Cross Opportunity Area, the potential improvements to public transport offered by the West London Orbital station at Brent Cross West will increase PTAL levels. The footnote needs to be revised to exclude reference to OAs where PTAL is sufficiently high to support lower maximum standards, as the table sets out standards based on PTAL. Proposed modification <i>Metropolitan and Major Town Centres to be Car Free~; and Up to 0.5 spaces per dwelling be allowed for developments within Opportunity Areas</i></p>												
Brent Cross South Limited Partnership (‘BXS LP’),	Table 24	<p>It is suggested that the heading ‘Brent Cross and Brent Cross West’ is amended to ‘Brent Cross Growth Area and Brent Cross West Growth Area.’ As per comments above, we query the indicative housing numbers for the Brent Cross Growth Area. As highlighted within the representations from Steer appended to this letter, there is a need for better transport monitoring. The plan period is to 2036 and the monitoring indicators for transport relate solely to parking (relevant only to TRC03), with nothing on public transport capacity or active travel. In order to justify the growth being proposed by the Local Plan and ensure that the public transport infrastructure is effective, additional monitoring should be captured as part of the indicators within Table 24.</p>												
Barnet Cycling Campaign	Chapter 12	<p>The 2012 version of the Infrastructure Delivery Plan only had a few ‘critical’ and ‘necessary’ items on walking & cycling for 2011-16.</p> <table border="1" data-bbox="465 833 1563 1114"> <thead> <tr> <th>Type of infrastructure</th> <th>‘critical’ & ‘necessary’</th> </tr> </thead> <tbody> <tr> <td>Transport</td> <td>£12,200,000</td> </tr> <tr> <td>Highways</td> <td>£110,341,000</td> </tr> <tr> <td>Parking</td> <td>£600,000</td> </tr> <tr> <td>Cycling & pedestrians</td> <td>£328,000</td> </tr> <tr> <td>Movement and connectivity total</td> <td>£131,821,000</td> </tr> </tbody> </table> <p>This was just 2.5% of the total cost on movement and connectivity, the majority of which was on highways. With ongoing delays to schemes in North Finchley and Brent Cross, it would be useful to know how much has actually been spent since 2011 on walking and on cycling and what has been delivered. Studies have consistently shown that <u>investment enabling people to cycle</u>^x 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. It is clear that a step change is possible to significantly increase the proportion spent on walking and cycling. This will be necessary to deliver the aims that are needed in Barnet’s Local Plan.</p>	Type of infrastructure	‘critical’ & ‘necessary’	Transport	£12,200,000	Highways	£110,341,000	Parking	£600,000	Cycling & pedestrians	£328,000	Movement and connectivity total	£131,821,000
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Whetstone Properties Ltd	Chapter 12	<p>The draft Local Plan seeks to deliver a minimum of 46,000 dwellings during the plan period to 2036, with the plan based on the housing need of the London Plan of 35,460 dwellings or 2,364 dwellings per annum. For the reasons outlined above, we consider that this housing need is unsound to be used as for the Spatial Strategy for the plan. Notwithstanding this point, we also express serious concerns that the plan fails to properly identify specific and deliverable sites for years one to five of the Local Plan period. Para 4.8.1 of the Local Plan reflects para 68 of the NPPF and sets out how identified housing need can be met over the Plan period and it states that: “<i>The Local Plan sets out how the London Plan housing target can be met over the Plan period. It must demonstrate a</i></p>												

Representor	Section	Summary of Comments
		<p>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." Table 5 within the London Plan is replicated below and it identifies how the 46,000 dwellings would be delivered during the plan period, with Table 5A being added into the draft Local Plan at regulation 19 stage. Based on the approach outlined in the draft Local Plan, with the housing need of the London Plan taken at 2,364 dwellings per annum, this equates to a total of 11,820 over the first five years of the plan period. The Council's figures outlined above state that the Site Schedule of new Homes only identifies the delivery of 4,600 homes in the first five years of the plan period. As such, the plan is falling significantly below the required figure and substantially relies on the broad growth areas for the delivery of housing in the early years of the plan period. As outlined in para 68 and the Glossary of the NPPF, these sites can only be relied upon for years 6 to 10 and 11 to 15 of the plan and so the plan is failing to meet the requirements of para 67 of the NPPF, even with the housing need from the London Plan used as the base housing need requirement. Further to the above, a total of 1,309 dwellings would be developed at the Sainsbury's, The Hyde (site No.14). The source for inclusion of this site as an allocation is due to it being submitted as a candidate site. It seems highly unrealistic, and out of step with the other delivery timeframes within the allocations, to state that a development of this size could be progressed through the planning process and wholly developed out within a 5 year time period. Indeed, the current planning consent for development of the site envisages the scheme coming forward on a phased basis (3 phases) with the first two phases comprising enabling works together with construction of a new supermarket and 770 of the proposed residential units. The remaining 539 units only come forward in Phase 3 once the first two phases are complete. The EIA accompanying the application goes onto confirm that: "...the works are anticipated to complete in 2030". As such, 2030, is considered to be the full year of completion and occupation of the development, which falls well beyond the identified 1 to 5 year window for development in the site allocation. Further sites that are also relied upon for the 5 year land supply include Land at Whalebones (Site No.45) for 152 units, where a planning application for the same number of dwellings was refused in July 2019 (app reference: 19/3949/FUL) with the refusal reason relating to the loss of the open space and its impacts on the character and appearance of the Conservation Area. This is a fundamental issue with developing the land and if the Council have refused a planning application on these grounds, it cannot consider it deliverable and suitable for a housing allocation. The site at Broadway Retail Park is also listed as a site which will deliver housing in the first five years of the plan. For this site the allocation is stated as being 1,007 dwellings. However, a live application remains at the site (it is not refused as reference in the draft Local Plan, but this indicate the Council's previously intended direction of travel). The application has been subject to hundreds of objections and an amendment to reduce the height of the buildings within the site by six storeys. As such, it is not clear if the Council would support a development to the scale being suggested within the allocation, given the substantial public objection to the planning application at this site. Moreover, even if the site does gain planning consent, the accompanying EIA confirms that the actual construction programme will take in excess of five years. To, therefore, rely on this site delivering over 1,000 units in the first five year period from 2021 is simply unrealistic. The above three sites equate to 2,468 dwellings out of the total five year supply of 4,600 homes where we would identify significant concerns with these sites being deliverable within the first five years of the plan, at the numbers proposed. Therefore, we consider that the plan cannot be considered sound, as it significantly fails to identify a specific supply of deliverable sites for the first five years of the plan, as required by para 68 of the NPPF. In order to make the plan sound and in accordance with the NPPF, the Local Planning Authority must use the standard methodology to calculate its housing need, in accordance with para 61 of the NPPF. The only exception to this is if the Council justifies an alternative approach which also reflects current and future demographic trends and market signals, which it is yet to do so. Once the housing need has been assessed against the standard methodology, the Council should assess whether it meets the criteria under paras 140 and 141 of the NPPF, as outlined in our covering representation.</p>
Bob Hamilton	Para 12.7.1	The Burroughs road is unsuitable for heavy development traffic passing Grade 11 listed buildings and as such the council and the developers are responsible for any damage to these buildings and their foundations.
Ropemaker Properties Ltd	Glossary – Agent of Change	<p>The current definition for the Agent of Change lacks a crucial nuance. NLP Policy D13 states inter alia that 'B. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them'. NLP Policy D13 is therefore clear that the Agent of Change principle addresses both the future as well as the current operation of sites such as the Garrick Industrial Centre (i.e. as it may evolve, with or without need for planning permission). The definition set out in the BLP (Reg 19) Glossary is inconsistent with the NLP and is therefore unsound. Suggested modification: <i>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. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. 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.</i> The text shown as struck through does not relate to the 'Agent of Change Principle'.</p>

Representor	Section	Summary of Comments
Regal JP North Finchley Ltd	Annex 1	Annex 1 sets out a schedule of sites allocated for development, which in respect of North Finchley, align with the Key Opportunity Sites identified in the SPD. It is noted however, that there are other sites identified within the SPD (i.e. 'Parade Enhancement Areas' and 'Other Opportunity Areas') which represent significant opportunities for regeneration but which are not allocated in the draft Plan. We would therefore request further discussion with the Council in respect of these sites. Annex 1 provides indicative redevelopment capacities for allocated sites which are calculated using a density matrix approach based on PTAL. Whilst these figures are noted as 'indicative', the reliance on PTAL is not supported as it fails to consider the future increase in accessibility which is likely to be facilitated through the policies of the Local Plan. For example, the infrastructure improvements planned for North Finchley are likely to promote an increase in PTAL levels, which would create further opportunities for optimising densities. As such, we are concerned that the inclusion of these figures fails to respond to the requirements of the new London Plan which removes the density matrix and instead seeks to optimise outcomes using a design-led approach. We therefore consider that additional wording should be added to each of the North Finchley site allocations which clarifies that the Indicative Residential Capacities do not represent targets for development, and that appropriate residential capacity will be assessed on a case-by-case basis against the design policies within the Local Plan. Annex 1 provides site requirements and development guidelines for each site. In most cases these represent general good practice urban design principles. However, in some cases very specific guidelines are suggested eg development heights. It is unclear what evidence base material is driving these specific guidelines, but we consider that the Local Plan should not prematurely define height and density. Development density and design should be optimised through a design-led approach as required by the London Plan and other policies within the draft Local Plan. We therefore request that the content of the site requirements and development guidelines for each site in North Finchley be reviewed.
Michael Barker	Annex 1	I wish to object to Annex 1, the proposals for specific sites in the draft Barnet Plan Barnet is already struggling with overdevelopment and the poor quality of the new homes currently recently built. The infrastructure in Barnet (roads, pavements, schools, medical facilities, libraries etc) cannot cope with current demand let alone with tens of thousands of new flats. Additionally, some of the sites, such as Edgware Hospital, are likely to be more prone to flooding due to the Climate Emergency. I think all the sites need reconsideration in the light of the Climate Emergency and with a full review of likely demand for new homes post the Covid-19 pandemic.
Michael Barker	Annex 1	In order to make the new Barnet Local Plan sound much greater emphasis should be placed on: <ol style="list-style-type: none"> 1. The quality of new homes which will need radical improvement; 2. Space standards which should be increased so that home working is easier for all; 3. At least 50% of new homes should be genuinely affordable with rents set at the level of current long term secured Council properties and new tenures should be fully secured for families with children; 4. Ensuring the community infrastructure is built and enhanced at the same time as a development occurs, not years later or never at all! 5. Fully assessing the impact of the climate emergency and the potential for future flooding risks, overheated buildings and the effects of pollution on health and well-being; Giving local residents a much greater say in the level and scope of development in their neighbourhoods
OmniState 360 Burnt Oak Broadway	Para 16 Annex 1	It is noted that the Council's housing delivery has been challenged at a recent inquiry and it has been acknowledged that proposals which deliver additional housing (both market and affordable) should be afforded significant weight. Given the significant housing need and apparent lack of five-year housing land supply it is vital that opportunities to maximise housing delivery through the Local Plan are secured. This must include the allocation of suitable sites where it is clearly demonstrated that these are Suitable, Available and Achievable. Omnistate, in their representations to the Regulation 18 consultation, highlighted that land at 360 Burnt Oak Broadway, Edgware HA8 5AN should be added to the Schedule of Site Proposals and allocated for housing development on the basis it was Suitable, Available and Achievable. In assessing the previous comments, the Council's Schedule of Representations made the following comment: <i>"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."</i> It is not considered that such an approach is sound or in conformity to national policy. Para 121 of the NPPF states that LPAs <i>"should take a proactive role"</i> in identifying and helping to bring forward land that may be suitable for meeting development needs and use <i>"the full range of powers available to them"</i> . The length of time between a Call for Sites and adoption of a new Local Plan can be considerable – as can the length of time between reviews of Local Plans. Indeed, the new Local Plan, which isn't expected to be adopted until late 2022 replaces the 2012 Plan. Inevitably there are circumstances whereby new sites become available or their circumstances change in the intervening period which renders them suitable and achievable for redevelopment. LBB's Call for Sites ended in August 2018, meaning that already three years has passed since submissions were accepted. The Government's Procedure Guide for Local Plan Examinations states that evidence-based documents, especially those relating to development needs and land availability, that date from two or more years before submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older. As a minimum, any such documents should be updated as necessary to incorporate the most recent available information. The implication

Representor	Section	Summary of Comments
		of this, if not addressed during this consultation and subsequent examination is a limit on site allocations and the potential shortfall in deliverable sites over the plan period. In light of the uncertainty regarding the Council's housing land supply, the adoption of the New London Plan and revised NPPF in the intervening period, the soundness of this approach must be questioned. It is noted that the Inspectorate's advice note to LB Barnet of April 2021, when the removal of sites doing Reg 19 was queried, stated that "If there's a change in position e.g. they are no longer available/deliverable, then it's important to remove sites from the plan". It is considered therefore that the converse must be true. 360 Burnt Oak Broadway (and other sites submitted since the Call for Sites ended three years ago) should be considered for allocation and should not be discounted just because of the stage of consultation. The new Local Plan must be formed on the basis of an up to date evidence base. Omnistate are currently bringing forward redevelopment proposals for the site at 360 Burnt Oak Broadway.
Theresa Villiers MP	Annex 1 – Schedule of Site Proposals	I am deeply concerned about the inclusion in the emerging Local Plan of a list of sites designated for development. It seems that the presence of a site in this list makes it far more difficult than it is currently for the council's planning committee to turn down an application. This list therefore undermines democratic input into planning decisions. The list pre-judges the outcome of planning applications without providing anything like the scrutiny that would normally be given to a planning application.
Barratt London	Para 16.2	Para 16.2 Assessing Indicative Residential Capacity of Sites Within Annex 1 (Schedule of Site Proposals), the Council has applied the density matrix from the London Plan (2016) to assess the indicative residential capacity of sites (para 16.2.1). The London Plan 2021 deletes this approach to density and instead adopts a design led approach with intention to optimise housing delivery, therefore the Regulation 19 Plan should be updated to reflect this. Whilst indicative capacities should not be read prescriptively, they may unintentionally raise local communities' expectations around the appropriate capacity prior to any design analysis. The actual development capacity of a Site will ultimately need to be determined through the detailed design and planning approval process and this should be made clearer in the Regulation 19 Plan.
Mark Tuban	Section 16.14 and Site 33	While one reason stated for its inclusion are the proximity to local transport and shops, the objection I have is due to the potential for increased air pollution caused by traffic congestion. Barnet council owes residents a duty of care. Road transport already accounts for a significant portion of air pollution in cities and towns. As residents, under the Human Rights Act 1998, we have an inalienable right to life by being able to breathe clean air. This plan will invariably lead to more cars, more traffic, more congestion, and more pollution. This in turn will equate to poorer air-quality that risk the health of all nearby residents (especially children, and elderly residents, of which there are a number in Langley Park). During certain times of day, Mill Hill Broadway and its surrounds are packed with cars and traffic. In fact, the meeting of Hale Lane, Bunns Lane and Mill Hill Broadway are already a significant bottleneck at rush hour. This causes significant tail backs and pollution through idling cars. Moreover, given the council's commitment for environmental sustainability – and given the current congestion around Mill Hill Broadway and Mill Hill Broadway station – the addition of 43 houses and a hotel, will only exacerbate this issue of pollution. This plan as it stands will lower quality of life for residents and potentially put their health at risk. And I object to it. My recommendation to the council would be to separately, or in whole, relocate the 43 houses and hotel planned for Site 33 (Bunns Lane) to other sites on the plan where there will less impact caused by additional traffic pollution. For example: site 67.
Historic England	Site Allocations	Further to our comments on tall buildings above, we note a number of amendments to the development guidelines for sites referred to in Historic England's response to the Regulation 18 consultation (sites 11, 34, 39 and 41). However, we would reiterate our comments in relation to a number of other sites where we consider the development guidelines are such that there remains a risk that proposals will come forward that would conflict with policies elsewhere in the plan designed to conserve the historic environment. We consider that further detail at this stage will provide greater clarity and certainty for all stakeholders over what would be allowed on each site.
Berkeley Group (on behalf on St James Group Limited/St William Homes LLP	Site Allocations	The Council has applied the density matrix from the London Plan (2016) to assess the indicative residential capacity of sites. The London Plan no longer contains this matrix and instead adopts a design led approach with intention to optimise housing delivery, therefore Barnet's approach to site allocation numbers and capacity should be updated to reflect this. St William supports the principle of residential uses for Site Allocation 21 'New Barnet Gasholder'. Following further site analysis and in line with the Mayor's design led approach for sites to be optimised, St William understand that the site could deliver at least 250 homes as opposed to the 201 homes as currently shown within the allocation. The allocation should therefore replace the word 'indicative' with 'minimum of'. The optimised numbers for the Albert Road site follow the draft Plan's spatial strategy of focussing growth on brownfield sites and within town centre locations. It will meet provisions as set out in draft policy CDH01. It also follows the Plan's policy to optimise such sites as expressed in paras 2.12, 2.13 and 2.21 of this representation. The inclusion of '10% community uses' is too onerous and is not based on any sound 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.' St William hope the above

Representor	Section	Summary of Comments
		<p>comments are helpful and trust that their comments will be duly considered as the draft Local Plan is progressed. We look forward to maintaining an interest at Regulation 19 stage.</p>
<p>Mactaggart and Mickel Homes</p>	<p>Site Allocations</p>	<p>The NPPF has been updated to place renewed importance on placemaking and beauty. Mactaggart & Mickel recognise that this goes far beyond individual house type design. Places should be underpinned by sustainable growth with positive development outcomes. Moreover, they should lead to healthier lifestyles, cohesive neighbourhoods and the creation of buildings that have minimal negative impact on the environment. The below plan shows a 15-minute public transport isochrone from the site. This provides access to a range of service and facilities in the area, including: Barnet Hospital, Saffron Green Primary School; Northway School; Courtland School and a large Morrisons Supermarket. The emerging Local Plan is framed in the context of a pre COVID-19 environment. It seeks to respond to the demise of traditional retail and the changing landscape of town centres. It promotes high-density apartment-led living in areas with a strong public transport network. Whilst there is obvious role for this form of development the emerging Local Plan does need to provide balance within its strategic policies. In accordance with national policy, the emerging Local Plan should respond to needs over the plan period. And, for the Local Plan to be found sound under the four tests of soundness as defined by the NPPF the Local Plan must be positively prepared, justified, effective and compliant with national policy. We encourage the Council to consider the importance of land to the south-east of Barnet Gate as having the potential to bring forward a sustainable urban extension which incorporates traditional family housing with cutting-edge digital and sustainability components. Mactaggart and Mickel would like to work collaboratively with the Council and other stakeholders to ensure an ambitious plan is delivered for the residents, business and visitors of the London Borough of Barnet. We would welcome the opportunity to discuss the site and the contribution it can make to sustainable development of the Borough.</p> <p>Figure 4 – 15 mins Isochrone from the Site</p> 
<p>Haringey Council</p>	<p>Site Allocations</p>	<p>Annex 1 of the Barnet Draft Local Plan sets out a schedule of site proposals. We have no comments in regard to any of the identified sites. We do however note from paras 15.3.4 (and earlier para 4.2.0.6) that, with regard to the designation of New Southgate as an Opportunity Area in the London Plan and the delivery of Crossrail 2, Barnet will consider bringing forward a joint area planning framework with Enfield and Haringey. We welcome this commitment to working in close partnership with Haringey on this key cross boundary development opportunity. We note that East Finchley is identified as a District Town</p>

Representor	Section	Summary of Comments
		Centre, with plans for further development and growth in this area. We have no comments on the proposals but wish to express an interest in keeping updated on plans for this area, due to its proximity to Muswell Hill District Centre.
Diocese of London	Site Selection	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).
NHS Property Services	Sites	Within the NHS property portfolio, a number of sites are, or may become outdated and no longer suitable for modern healthcare without significant investment. In those cases, and where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services in that particular location, a more flexible approach for public service providers should be applied when considering a change of use to non-community uses. This should include a presumption in line with national policy that those sites are suitable for other uses and should not be subject to overly restrictive planning policies. In addition, arbitrary floorspace figures should be avoided. These figures can severely limit the quantity and quality of future healthcare facilities provided and are detrimental to the provision of NHS services within the borough.
TfL (Commercial Development)	Site 6	TfL CD appreciates the addition of the reference to improving interchange and contributing towards achieving station step free access.
TfL (Commercial Development)	Site 61	TfL has leasehold interests at this site related to the bus station. Our colleagues in TfL Spatial Planning will comment on this draft allocation.
TfL (Commercial Development)	Site 9	We note that site capacity has been reduced from 138 to 128 new homes since the Reg 18 consultation. Please could you let us know the reason for this.
Historic England	Site 1	Given the number of designated heritage assets either adjacent to or in close proximity to the site, we consider that there should be greater detail in the policy as to how effects of any development will be managed. This should include any potential effects on setting and include a requirement for archaeological assessment.
Thames Water Utilities Ltd	Site 1	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
Theresa Villiers MP	Site 3	Brunswick Park ward Opposed because of the overdevelopment this would involve. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals.
Theresa Villiers MP	Site 4	Brunswick Park ward Opposed because of the overdevelopment this would involve. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals.
Thames Water Utilities Ltd	Site 10	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 .

Representor	Section	Summary of Comments
TFL (Spatial Planning)	Site 10	We welcome the requirement for public transport access improvements.
Thames Water Utilities Ltd	Site 11	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 .
Thames Water Utilities Ltd	Site 12	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 .
Thames Water Utilities Ltd	Site 13	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 .
Roger Chapman Ramblers Herts & North Middlesex	Site 13	This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route. If the Strategic Walking Network is not adopted: Development proposals should take the opportunity to ensure effective connectivity on foot and open up its access to the Silk Stream with a walking and cycling route.
Canal & River Trust	Site 14	Although this site does not di significant impact on the 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. We support the requirement for the site development to avoid harm to the adjacent Site of Borough Importance for Nature Conservation, and include improvements to the Silk Stream River Corridor.
Environment Agency	Site 14	We are obliged to find the inclusion of the site unsound until we see evidence that the Sequential Test has been applied. Please see our representation to GSS01 for further information. Although this site has been assessed by a Level 2 SFRA, we disagree with some of the comments that have been made next to 'justification' and 'site requirements and development guidelines.' Justification: <i>The site has received planning permission (19/4661/FUL)</i> . Whilst this may be true, the part of the justification and basis for allocating this site for development is that the Level 2 Assessment has concluded this site can be safely developed. Planning permissions are not always implemented, and circumstances can change over time, e.g. flood modelling changes, the durability and condition of flood defences, climate change. <i>Site requirements and development guidelines: 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.</i> In our comments to the draft Level 2 SFRA we did highlight that although according to our flood model the site benefits from the protection of defences, there may be a residual risk of flooding if the defences are breached, and developers should ensure the necessary precautions are taken to account for this. We recommend developers consider the impacts of possible flooding in a breach event (including climate change) and raise floor levels and adopt flood resilience measures. Flood defences cannot be relied on absolutely, especially given the unpredictable nature of climate change. The Level 2 SFRA also highlights that defences are located upstream in Edgwarebury Park for the Silk Stream. As we have highlighted for the Growth Areas, early work is ongoing on a new Silk Stream Flood Alleviation Scheme. It's possible that planning contributions may be sought for this scheme and/or an improvement to the existing defences in order that this site can continue to benefit from that protection. Currently, although this allocation has been informed by a Level 2 SFRA, the site requirements are missing crucial points about (a) planning for residual flood risk in a breach event (b) the potential for offsite

Representor	Section	Summary of Comments
		<p>planning contributions being sought and (c) the opportunity to apply the sequential approach on site so that the most vulnerable uses of the scheme are steered towards the areas of lowest risk on the site. In addition a more explicit reference to the need to refer to the Level 2 SFRA requirements is required. Therefore the site requirements are not considered sound as they are not currently justified (an appropriate strategy based on proportionate evidence – in this case the Level 2 SFRA and our comments in response to the draft report). The site requirements are also not sound as they are not in the spirit of para 149, 155 and also para 163 part (a) ‘within the site, the most vulnerable development is located in the areas of lowest flood risk’ and (d) ‘any residual risk can be safely managed.’ The site requirements have also omitted some key requirements with regards to its position adjacent to the Silk Stream main river and Brent Reservoir SSSI. In regulation 18 version of the plan the following text had been included within the site requirements which we had been able to support: Proposals must manage flood risk and avoid harm to the adjacent Site of Borough Importance for Nature Conservation. Improvements to Silk Stream River Corridor required. We are unsure as to why improvements to Silk Stream River Corridor have been removed in the regulation 19 version. Even if the majority of the river corridor is outside the redline boundary planning obligations could be secured to achieve this. Our comments at the regulation 18 stage were as follows: <i>We support improvements to Silk Stream River Corridor required. 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.</i> Given the very sensitive position of the site adjacent to the Silk Stream main river, the Local Wildlife Site/Site of Borough Importance for Nature Conservation and in close proximity to the Brent Reservoir SSSI we think this warrants specific site requirements to be included to ensure soundness. Otherwise we think it would not be consistent with the NPPF specifically paras 170, 174 and 177 which set out the framework for Planning Policies to protect and enhance valued landscapes and habitats, protect SSSIs and achieve net gains for biodiversity. These concerns can be easily addressed through modifications to the text. Please see our recommendations under Question 4. We recommend the following modifications to address the concerns raised above: (a) The Sequential Test should be applied. See our representation to GSS01 for further detail. (b) 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. We recommend this is replaced with the following: The current flood model indicates the site is protected by flood defences up to the 1 in 100 year flood event. However, the possibility of residual flood risk from a breach in flood defences should be considered and precautionary mitigation measures included such as raised floor levels and flood resilience measures. Planning contributions may be sought to improve the strategic flood risk infrastructure benefitting the site. (c) A SFRA Level 2 has been carried out for the site and should be referred to for further guidance. (d) Given the location adjacent to the Brent Reservoir 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. Given the location of site adjacent to the Silk Stream main river and SINC habitat improvements to the river corridor should be sought involving engagement with Canals and Rivers Trust and the Environment Agency. Proposals should avoid harm to the SSSI through careful consideration of drainage proposals and habitat works.</p>
Thames Water Utilities Ltd	Site 14	<p>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.</p>
Thames Water Utilities Ltd	Site 14	<p>The proposed development is located within 20m of a Thames Water Sewage Pumping Station. Given the nature of the function of the pumping station and the close proximity of the proposed development to the pumping station we consider that any occupied premises should be located at least 20m away from the pumping station as highlighted as best practice in our Codes for Adoption . The amenity of those that will occupy new development must be a consideration to be taken into account in determining the application as set out in the NPPF (NPPF) 2019 at paras 170 and 180. Given the close proximity of the proposed development to the pumping station we consider that it is likely that amenity will be impacted and therefore object. Not with standing this objection, in the event that the Local Planning Authority resolve to grant planning permission for the development, we would request that the following informative is attached to the planning permission: “The proposed development is located within 20m of a Thames Water Sewage Pumping Station and this is contrary to best practice set out in Codes for Adoption (https://www.thameswater.co.uk/developers/larger-scale-developments/sewers-and-wastewater/adopting-a-sewer). Future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise.” With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior</p>

Representor	Section	Summary of Comments
		approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services .
Roger Chapman Ramblers Herts & North Middlesex	Site 14	This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route. If the Strategic Walking Network is not adopted: Development proposals should take the opportunity to ensure effective connectivity on foot and open up its access to the Silk Stream with a walking and cycling route.
Thames Water Utilities Ltd	Site 15	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
Roger Chapman Ramblers Herts & North Middlesex	Site 15	This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network.
Thames Water Utilities Ltd	Site 16	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
Theresa Villiers MP	Site 16	East Barnet ward Opposed because of the overdevelopment this would involve. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals
Roger Chapman Ramblers Herts & North Middlesex	Site 17	Development should provide walking and cycling route through allotments to Belmont Open Space
Thames Water Utilities Ltd	Site 18	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
Theresa Villiers MP	Site 18	East Barnet ward Opposed because of the overdevelopment this would involve. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals
Thames Water Utilities Ltd	Site 19	On the information available to date we do not envisage concerns regarding wastewater treatment capacity 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
Thames Water Utilities Ltd	Site 2	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
Roger Chapman Ramblers Herts & North Middlesex	Site 2	Development of this site should include green spaces and pocket parks with walking and cycling routes to provide access for residents and attractive linkages between Brunswick Park Road, Ashbourne Ave, Howard Close and Oakleigh Road.

Representor	Section	Summary of Comments
Thames Water Utilities Ltd	Site 20	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
Thames Water Utilities Ltd	Site 21	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
Roger Chapman Ramblers Herts & North Middlesex	Site 21	Development should incorporate key footpath linkages.
Theresa Villiers MP	Site 22	New Barnet Sainsbury's It would be unacceptable to build 199 flats on the Sainsbury's site. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals.
Thames Water Utilities Ltd	Site 22	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
Historic England	Site 23	It is important to be clear about the significance of any heritage assets present on site allocations – both listed buildings on the site should be identified in the policy, rather than one as at present.
Thames Water Utilities Ltd	Site 23	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
Judith Salomon	Site 24	I strongly support the redevelopment of the car park for housing, including affordable housing. Part of the site is outside the Town Centre, and part is on the edge. The Town Centre which is well-served by three supermarkets and a great number of independent stores, the site is not appropriate for retail including convenience retail. The viability of retail and town centres is incredibly fragile and would not be helped by an extension to the TC or retail provision, if anything the centre would benefit from consolidation. Any commercial uses should expressly exclude retail/convenience retail.- – the reference to E classes should be amended.
Historic England	Site 24	The identified capacity on the site is such that there will undoubtedly be impacts on the listed station building. As set out, there does not appear to have been any analysis of the heritage significance of the station or whether this significance will be affected by any development within the parameters set by the allocation. We would direct you to our advice note on this subject, which includes a step by step methodology for just such a scenario: https://historicengland.org.uk/images-books/publications/historic-environment-and-siteallocations-in-local-plans/ . We would stress that we are not opposed in principle to development on this site, but would urge some analysis of the likely impacts to be able to make an informed decision as to the effects on the historic environment. It should also be made clear that this location is not appropriate for a tall building.
East Finchley Community Trust (EFCT)	Site 24	Add to Site No. 24: An additional sentence is requested on the site description and development guidelines. Site description. "A community garden maintained by the N2 Gardeners has existed for over ten years on land adjacent to the Station." Development Guidance. "The community garden should be retained and respected in any new designs." We would hope that the addition to text at Site 24 will not be controversial and can be agreed with the Council but if it can't then the Trust would wish to make representations at the Examination on this site proposal. If there is opposition to the new park/open space proposals then the Trust would wish to be represented to make its views known.
Thames Water Utilities Ltd	Site 24	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

Representor	Section	Summary of Comments
TFL (Commercial Development)	Site 24	We appreciate the changes that have been made to address our concerns. However, we would suggest changes to the “Proposed Use” to delete the references to percentages (which may constrain the optimisation and delivery of new housing and development) and to be consistent with the approach to re-provision of commuter car parking on TfL sites (and therefore sound): <i>70% residential floorspace and 30% commercial uses (E Class), public realm including station drop-off and limited commuter public car parking</i> The “Justification” currently (and presumably erroneously) infers that development of this site would enhance car parking on the site. That would not be TfL’s intention and the “Justification” must be amended. We suggest: <i>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 reduce commuter public car parking based on adjacency to the underground station and local bus routes, and provisions to encourage active modes of travel.</i> And finally, the last sentence of the “Site requirements and development guidelines” must also be amended: <i>Public car parking requirements must be assessed and if there is a demonstrable need for limited replacement of some car parking, it may be supported through a more land-efficient design approach and should include spaces and re-provided as needed, and access ensured for people with disabilities.</i> Without these amendments, we do not consider that this site allocation would accord with the MTS or London Plan.
Roger Chapman Ramblers Herts & North Middlesex	Site 24	This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network.
Judith Salomon	Site 25	I strongly support the redevelopment of this redundant site for housing. I agree that the use should be overwhelmingly for housing and would question the viability/demand for any offices and suggest the reference is removed. Site capacity should be determined by the mix of homes (including affordable homes) and appropriate scale balancing the location close to the station, and proximity to the conservation area. As the site is not the Town Centre, and the TC is well-served by three supermarkets and a great number of independent stores, the site is not appropriate for retail including convenience retail. The viability of retail and town centres is incredibly fragile and would not be helped by an extension to the TC or retail provision, if anything the centre would benefit from consolidation. Remove reference to offices. Expressly state no retail/convenience retail
Thames Water Utilities Ltd	Site 25	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
Thames Water Utilities Ltd	Site 25	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
TFL (Commercial Development)	Site 25:	We appreciate the changes that have been made to address our previous concerns. The “Development timeframe” should be reduced to five years. The site has been acquired by a local developer who has commenced local community engagement with a view to submitting a planning application soon for mixed residential / commercial redevelopment.
Thames Water Utilities Ltd	Site 26	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
Thames Water Utilities Ltd	Site 26	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
Friends of Cherry Tree Wood	Site 26	An opportunity exists to create new open space adjacent to Cherry Tree Wood which is remnant ancient woodland, designated MOL and a site of local significance for nature conservation. It lies on an abandoned piece of tarmac (part of Brompton Grove) and the access to the High Road was cut off probably in the 1960s. The land is owned by Barnet Council. It has lain unused except as car parking until that was prevented in the last five years. The sensitivity of Cherry Tree Wood is noted in Site requirements given on the adjacent Park House site (site 26) in Annex 1 of the plan. The existing mature trees on that site

Representor	Section	Summary of Comments
		<p>are to be retained. The open space frontage if extended to this site would give a new landmark entrance to the Wood – which currently is recessed - opposite the Grade II listed East Finchley Underground station and would be a marked improvement on the Urban design of the current start to the East Finchley Town centre. It would remove a large section of tarmac which is currently only adding to the Heat island effect and replace it with natural open space which should be designed to complement the ancient woodland, provide shade and seek to improve pollinator activity to support the B line which runs through this site. Add new proposal 26A Extension to Cherry Tree Wood</p>  <p>A new proposal for land which has not previously been promoted should be examined .</p>
Betterpride Ltd	Site 27	<p>The draft Local Plan allocates this site for the intensification of housing and town centre uses. Residential capacity is estimated at 2,379 units, emphasising the strategic importance of this location in the delivery of the borough's housing targets. Given the importance of this site, within the borough's only major town centre, we support this site allocation. Further, the draft Local Plan notes that "Edgware is identified as a strategic location for tall buildings of 8 storeys or more. Tall buildings may be appropriate within the boundaries of the Town Centre"¹. While we welcome this acknowledgement that Edgware is an appropriate location for tall buildings, we ask that the detail of the site allocation is brought in line with Objective 4 of the draft Edgware SPG, which highlights that this area is also suitable for very tall buildings (over 15 storeys).</p>
Ballymore Group and TFL Commercial Development	Site 27 Site 28	<p>Site No. 27 comprises the Broadwalk Shopping Centre and car park and the Forumside sites (outside of Ballymore and TfL's ownership). The site also includes existing tall buildings at Premier Place which ought to be referenced in the "site description" section. Site description: 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. <u>There are tall buildings on the site including Premier House and Premier Place, currently under construction.</u> 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. Site 28 comprises Edgware bus and Underground stations, platforms and tracks and areas of open land to the south and east. Site 28 is in the ownership of TfL and is adjacent to Site 27. Collectively, both sites are intended to be the focus of intensification in the Edgware Growth Area, particularly in terms of housing delivery. Given the importance of these two sites within the town centre and their adjacencies, we consider that there is an opportunity to incorporate both in to one allocation. The separation runs along the ownership lines however, both landowners are working in partnership to deliver comprehensive master-planning and redevelopment of both sites as a singular piece. A consolidated approach to the will ensure that the Local Plan is effective in its delivery. The Council's approach to the site allocations is set out the Site Selection Background Report (2019). This explains that the indicative residential capacities have been derived using the density matrix from the old London Plan. Notwithstanding, in view of the new Standard Methodology and anticipated increases in Barnet's housing targets over the plan period, we consider that there is merit in presenting the indicative site capacities as minimums to ensure the site allocation policies are sufficiently flexible and effective in their delivery: Site 27 <u>Minimum indicative residential capacity: 2,379</u> Site 28 <u>Minimum indicative residential capacity: 2,317</u></p>

Representor	Section	Summary of Comments
		<p>With respect to non-residential uses, we note the following requirements:</p> <p>Site 27: 75% residential floorspace with 25% mixed uses of town centre commercial (retail and office), entertainment, community and car parking.</p> <p>Site 28: 70% residential floorspace with 30% mixed uses of town centre commercial (retail and office) and transport infrastructure</p> <p>Para 6.3.3 of the Site Selection Background Report states that an “assessment” on the requirement and suitability of non-residential uses was undertaken but no further detail on the methodology or assumptions is provided. Where the Edgware Town Centre sites (27 and 28) are required to deliver in excess of 4,500 units, a requirement of 25% and 30% non-residential uses respectively may constrain development and the delivery of new housing which would run contrary to the Growth Area objectives.</p>
Thames Water Utilities Ltd	Site 27	<p>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.</p>
Roger Chapman Ramblers Herts & North Middlesex	Site 27	<p>This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network.</p>
Thames Water Utilities Ltd	Site 28	<p>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.</p>
TFL (Spatial Planning)	Site 28	<p>We welcome the requirement for bus operations and the function of the bus station to be protected or re-provided as part of any redevelopment and that London Underground infrastructure and operations must also be maintained.</p>
Roger Chapman Ramblers Herts & North Middlesex	Site 28	<p>This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.</p> <p>If the Strategic Walking Network is not adopted: Development proposals should take the opportunity to ensure effective connectivity on foot and open up its access to the Silk Stream with a walking and cycling route.</p>
Mill Hill Preservation Society	Site 29:	<p>Site 29: Landscape planting needs to be included along the motorway to screen the site. (see accompanying letter) Site 29: Scratchwood Quarry NW7 3JA – Waste Management: This site has the potential for increased use, which is not disputed. However, this is an important location as it is on one of the main approaches to London viewed from the M1 and is highly visible. There is a clear need to improve the visual aesthetics of the site and reduce any additional air pollution with appropriate screen planting along the motorway. To ensure the effectiveness of the policy, it should be updated to include a requirement for screen planting along the motorway boundary. We suggested that previously but this has been ignored in the latest version of the Local Plan. MHPS believe this position should be reconsidered.</p> <p>Site 29: Include for screen planting alongside the motorway to limit views into the waste management site.</p>
Thames Water Utilities Ltd	Site 3	<p>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</p>
Roger Chapman	Site 3	<p>Use the opportunity to improve walking and cycling access to the primary school and to Brunswick Park open space.</p>

Representor	Section	Summary of Comments
Ramblers Herts & North Middlesex		
Peter and Nargis Walker	Site 30	<p>We have been homeowners in Finchley Church End, close to Finchley Central Station, for 21 years. We are very concerned about the proposed development plan for our neighbourhood in the Barnet Local Plan. We do not feel that it reflects the best interests of current and future residents in our neighbourhood. The proposal for 556 residential units, including 20 storey buildings, to be built on a small footprint, adjoining the Northern Line, and in a long-standing low-rise residential area, will have a devastating impact on the local environment and the preservation of the unique character of the area. The proposed changes in an already congested neighbourhood will neither enhance the quality of life for residents, nor will they address the existing needs of infrastructure, affordable housing or local independent businesses. The impressive aspirational statements expressed in the summary, are totally contradicted by the changes proposed. It would be hard to argue against any of the vision statements, and it is true that Finchley Central needs urgent change to update and clean up the increasingly shabby town centre and build more homes.</p>
Daniella Shalev	Site 30	<p>I cannot put this in stronger terms than this. This development is ill conceived, far too large for Finchley Central. The large tall 20 story blocks will darken, over crowd and dwarf the area, changing the neighbourhood's character beyond recognition. This area is not Camden or Archway stop trying to turn it into those crime ridden crowded neighbourhoods. Regents Park rd from Easy end rd to Finchley Central is already at a standstill from 3pm till 7pm everyday due to traffic and a road that cannot be widened, don't add more flats to this already overcrowded area, flats bring more people which will bring more cars, regardless of whether or not you tell me the new flats won't have car parking spaces. You need to start listening to residents of Finchley Central and stop ignoring our views. It's a loud NO to this huge monstrosity of a development which ruins the character of the area. I live on the claignmar estate and we chose to live here in Finchley for its leafy quiet character, let Greater London areas remain that and stop trying to turn them into inner London crime encouraging ghettos. Don't wreck this neighbourhood with this development. If TFL needs to raise money, it should do so through other means and not greedily selling the much needed car park - this is outer London, if you don't want us to drive to town then allow us somewhere to park our cars, many ppl who park here come from further outlying areas as well as local ppl who use it too who need to park after dropping children off at child care. They have no choice, but to park at the station. Many flats have been built in this area and north Finchley in the last ten years and further flats are not necessary and will not benefit this outer London leafy neighbourhood, it will only harm it. Building houses would far better meet the needs of this neighbourhood and for the character of this neighbourhood. As I said I strongly condemn the idea of twenty story towers in Finchley Central and ask that my strong objections be taken into account and not ignored.</p>
Ms Tricia Book & Dr Adrian Reuben	Site 30	<p>My husband and I wish to object most strongly to the extent of the proposed redevelopment at Finchley Central station, although obviously we understand the Government's desire for additional new housing. The political implications have caused residents to be fobbed off with blame laid on the Mayor of London and Transport for London, but we simply wish to focus on the plans themselves.</p> <ol style="list-style-type: none"> 1. The proposal for four tower blocks of 20 storeys each ignores the fact that there are no buildings even close to that height in the surrounding area so these blocks would be totally out of keeping with the existing environment. The maximum height of pre-existing buildings nearby is about 9 storeys! We are also concerned at the prospective loss of light in the immediate neighbourhood. 2. The area around the station is already crowded with residents creating volumes of litter in the adjacent streets. Finchley Central has become noticeably run-down by comparison with neighbouring areas such as Temple Fortune, North Finchley and Whetstone. It is not pleasant walking the streets at night. The addition of vast numbers of new properties at Finchley Central can only exacerbate these problems. 3. Pre-pandemic, the car park at Finchley Station was always full with commuters' cars. Whilst it is likely that a change in working habits will lead to lower daily usage by commuters, nevertheless there needs to be parking available for those who need to commute to their places of work; the surrounding streets are all restricted parking zones. 4. The plans seem to assume that the new residents will mainly use public transport and will not, therefore, require parking spaces. This is nonsensical as children have to be taken to school and residents need to get to their places of work; both activities could require use of a car so adequate parking facilities are vital. We are aware of the steps that Barnet Council and the Government are taking to encourage cycling, but bicycles are no answer for the elderly or for children. <p>We urge Barnet Council to reassess the proposals very carefully and recognise the need for a significant reduction in the height of any tower blocks plus the provision of car parking facilities for the new residents and commuters.</p>
Peter and Tina Schindler	Site 30	<p>We are writing to you as concerned local residents of Finchley Central. We live at Flat 15, Clementine Court, 4 Dollis Park, N3 1HG, just around the corner from the proposed new high rise development. The plan for Finchley and Golders Green includes a proposal to construct 556 residential units on Finchley Central Station car park. This is a very large amount of development for a small space and we have been informed in consultation that blocks of 20 storeys</p>

Representor	Section	Summary of Comments
		<p>are planned . This is despite the fact that buildings more than 15 storeys high are not permitted unless exceptional circumstances can be demonstrated. (Policy CDHO4). There can be no exceptional circumstances in a residential area such as Finchley Central as far as we can see. There is no explanation as to why the proposal for units at Finchley Central far exceeds the number of units at all other sites in Finchley and Golders Green. The indications we have been given is that there will be four 20 storey blocks completely changing the geography and landscape of Finchley Central and this will be completely out of keeping with the area. In addition, there are other considerations:</p> <ol style="list-style-type: none"> a. The development will lead to huge disruption for the area for a considerable time. This is an area that already struggles with congestion at the best of times. b. There will be a serious environmental impact by creating so many homes in such a small area, considering that we live in the direct vicinity of the Church End Conservation Area. There will be loss of light, increase in population density and no supporting infrastructure. c. There is already a great shortage of GPs and school places in the area and this will be seriously exacerbated by the addition of 556 new homes. d. As commuters to Central London on a daily basis we can vouch that travel from Finchley is already difficult. There is a service from Mill Hill East to Finchley Central which is now already full by the time it reaches Finchley Central as a result of the numerous homes already built in Mill Hill (and that development is not complete yet so will add a further strain to the Northern Line). A great many people will be trying to join the train at Finchley Central which will become impossible at rush hour. is already overcrowded on normal mornings and evenings. e. There is a limited bus service with only Number 13 going into Central London. f. The pressure to dispense with cars is totally unrealistic. People who are older, disabled, with children to deliver to different schools and going shopping will need cars. The public transport system as it is will not support the additional burden as it is at the moment g. Losing parking spaces to encourage cycling as proposed, will only suit the young and fit residents but does not take into account the many older people living in Finchley Central who depend on their cars to get around. These older residents will feel even more isolated. People who are disabled will find it impossible to manage without a reasonable number of disabled parking spaces. It is not possible to access many tube stations in a wheelchair. The proposals do not take this into account in any means. h. Our home will be directly impacted by the loss of light and air as our flat directly faces the proposed site. A lot of people's homes will be overshadowed. It is wholly unrealistic to imagine that the addition of large buildings will not affect people who live close by. i. As far as we can tell there appear to be vacant buildings that could be utilised rather than constructing totally unsuitable buildings in a residential area with practically no high buildings and nothing anywhere near 20 storeys. This will change the entire appearance of the area, but in a detrimental way. <p>Our preferred proposal would be to cancel the development entirely as it is inappropriate for Finchley Central and its environs.</p>
Lynne and Jeff Fisher	Site 30	My husband and I really object to the idea of you building flats in the Finchley Central car park. It would change the whole face of the are. We also have our family that use the station car park which would cause a real problem for people using the train.
Pavan Sadarangani	Site 30	<p>I live with my wife and 3 year old daughter near the Travelodge near Finchley Central station. We've come across the proposed developments that are outlined for new buildings near Finchley Central station. I am sure you've heard many others against this, I've been told by many they aren't pleased about this, but I'd like to share my personal experience. We truly love living where we do. It's wonderful at the moment, especially considering we have a three year old, it's great having easy access to Stephens House gardens, Victoria Park and Dollis Valley. With that said, there are certain times where things are not ideal. The Travellodge parking lot is always filled with troublemakers. There are no shortage of times my neighbors have had to call the police because they've seen those individuals dealing drugs in the parking lot, but the police simply told them there were no resources. We've had a new development come up next to us, again which has its own set of issues with troublemakers doing things like breaking glass and jumping over fences into properties where little children live.</p> <p>From my perspective, the Finchley Central area is great, but it seems the resources allocated at the moment are stretched thin to support the area. If there are 500+ new flats built, I can't imagine how those will be supported. How will you ensure there are resources to prevent adolescents engaging in this type of behaviour? Add to that the traffic is terrible whenever I go walking to drop off and pick up my daughter from nursery. I can only imagine it'll get worse adding 1000+ residents to the area. While I acknowledge the need for more housing in London, putting more housing in an already highly populated area doesn't make sense to me. We are firmly against this proposal. We are happy to discuss this further with you if there's anything you'd like us to elaborate on.</p>

Representor	Section	Summary of Comments
Peter R Walker	Site 30	Para 7.7.6 states that: "town centre development will be expected to enhance the public realm in order to improve accessibility, social spaces, safety and the environment" As a homeowner resident of Finchley Central for 21 years, I cannot see how the proposals contained in the draft Local Plan for Site No. 30 Finchley Central Station would achieve these objectives. Too many units of accommodation are proposed in what is a very small land footprint, mostly adjacent to or part of the Northern Line embankment, with no provision for new schools, health centres, doctors' surgeries and an unrealistic split between residential and other uses, if 556 residential units are to be created on such a small site. The only way this will be achieved will be through the construction of several very tall buildings. Para 6.18.12 makes it clear that this site is being considered for tall buildings up to 14 storeys. An engineering feasibility study of this site, which can be found on line, has already illustrated how challenging this would be. The development guidelines make very weak references to preserving the Church End Conservation Area and the "Finchley vernacular". The justification refers to this as a "highly accessible town centre location". I don't know what definition of "accessible" the authors of the Barnet Plan are using, but the traffic is often congested and at a standstill in Finchley Central. The construction process itself would create extreme congestion at a busy junction adjacent to a road bridge over a railway over several years and damage the local economy and infrastructure, which is already fragile post-pandemic. Your plan's first and a key objective is "to respond and recover from the impact of COVID19". How building high density residential units with no outside space on a very compact site would achieve this is unclear. Post-pandemic people want low-rise and outside space. Specifically, it is not clear how access would be achieved for the building proposed along the railway line behind the houses on Dollis Park between Crescent Street and Regents Park Road. Improvements need to be made to Finchley Central and the area around the station, including access to the station itself. The embankment areas adjacent to Station Road and Nether Street are in dire need of enhancement. If and when specific development proposals are brought forward for Finchley Central, they should include low-rise options, a significant reduction in the number of residential units it is possible to build on such a small land footprint, a clearer analysis of the supporting services required (from utilities to schools and healthcare) and a more specific description of the retail and business units to be created to benefit the development and wellbeing of the area.
Amanda Dean	Site 30	I wish to object to the proposal to build this, even in its revised form. Such an enormous structure would be totally out of keeping with the buildings currently in the area. A sudden large influx of further residents will be too much for infrastructure such as GPs and schools which are barely sufficient at present. I also believe that the consultations offered were inadequate – they were 'presentations' and did not give access to those with real input into the process.
Andy Astle	Site 30	I wish to object to the proposed building of a residential tower block on the site at Finchley Central Station. The proposed tower is grotesquely out of all proportion and scale to any surround buildings, and, judging from the designs so far released, has no redeeming architectural merit whatsoever. The additional burdens on local services seems to have been completely ignored. GP services in FC are almost impossible to access at present. The public 'consultations' regarding this proposal were little more than PR Presentations; objections being met with patronising remarks about how this tower and surrounding developments will improve all aspects of Finchley Centra life. It won't. I object.
Thames Water Utilities Ltd	Site 30	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
Jestyn & Valerie Phillips	Site 30	I believe that the 10 storey Central House office block at the corner of Nether St and Ballard's Lane N3 is already too dominant for the architectural balance of the area. We successfully campaigned to keep the Tesco site at its present height in the mid 70's after Pope's Garage was demolished despite suggestions then that a tall office block should occupy the site conjunctly. The area still retains a worthwhile character with its many Edwardian shop frontages and I strongly feel that the balance between that and the new developments should not be allowed to imperil this. Thus certainly no buildings higher than 10 storeys should be allowed. The Church End area should not be sacrificed at the expense of further office/residential blocks. The recent suggestions by LT of enormous blocks of 20 storeys and squeezing buildings in every possible spot regardless of the general neighbourhood should be totally unacceptable.
Dr Simon Wan	Site 30	consider the Tall Buildings policy unsound, especially the provision stating that tall buildings may be suitable for the Finchley Central town centre, including the Station site (proposed site 30). I do not consider the policy justified in that it would detract significantly from the residential amenity of surrounding residential streets: - A building of up to 14 storeys would tower over the houses of Station Road, Lichfield Grove, Hervey Close, Redbourne Avenue, all of which are at most two to three storeys tall. Many houses would be in permanent shadow. - It would change the nature and culture of the area indelibly and for the worse by changing the landscape of the town centre - It would cause serious congestion on Ballards Lane, where traffic is already a significant problem most of the day - Removing the Station Car Park would force all station parking onto surrounding residential streets, where residents already depend on off-street parking I do not consider the policy effective:

Representor	Section	Summary of Comments
		<p>- without addressing residential demand seriously. Post-COVID London residents no longer wish to reside in a tower block up to 14 storeys, especially one that is not within the heart of the city itself in Zone 1. Lots will remain vacant and unoccupied- Remove Finchley Central and North Finchley from the areas where Tall Buildings will be considered</p> <p>- Remove the ability for 'Very Tall Buildings' to be considered for development</p> <p>- Keep the station car park at Finchley Central Station as is as this would reduce the congestion on residential streets where station-goers already park their cars, forcing residents to park even further away</p>
Tamara and Michael Rabin	Site 30	<p>We were unable to navigate Part B of the form for responding to the Barnet Draft Local Plan as it is almost impossible for a lay person to understand so we are responding as individuals who are resident in the area We are of the opinion that the proposals for Finchley Central are totally unsuitable for the area. This submission is on behalf of Tamara and Michael Rabin</p> <p>Our reasons</p> <ol style="list-style-type: none"> 1. The proposal to build 556 residential units including four 20 storey buildings is not suited to a small area as proposed where all the surrounding development is low rise. Finchley Central has a character that will be completely lost by such a large and insensitive development. 2. Barnet policy only permits the construction of buildings over 15 storeys high when there are exceptional circumstances (Policy CDHO4). There is no evidence of any such circumstances here and such blocks would be completely out of keeping in the area. Looking at the Local Plan it appears that the plan for homes in Finchley Central far exceeds the number of homes planned in other Finchley and Golders Green sites. 3. The proposed buildings are totally inappropriate for this area and, rather than create a cleaner environment with open spaces, will create overcrowding, pressure on services and pollution. 4. The construction of four 20 storey blocks will not only be out of keeping but will overlook some properties and overshadow some restricting access to light and air. 5. There is a safety concern by putting so many people in a restricted space as demonstrated by Grenfell Tower. Escape in the case of a fire could be difficult, especially in the case of elderly or disabled residents making a quick escape very difficult if not impossible 6. Whilst we accept there is a need to improve the area of Finchley Central and provide more homes, the addition of 556 homes with four 20 storey blocks is totally inappropriate and has been proposed without any thought of the impact on the area 7. The proposal does not include any realistic parking provision and includes only a "micro park" to provide open space for 556 families. It is important that outside space and greenery are maintained for the benefit of the population and to assist in climate control 8. The proposal will result in complete paralysis of traffic in the area. The blocks are proposed in a location where their construction will affect Regents Park Road, Ballards Lane, Station Road and Nether Street. This will require re-routing of traffic through already crowded streets. This will adversely affect both businesses and residents in the area for a very long time as well as causing considerable pollution. A development of the size that is proposed will take a very long time to complete causing total disruption to the area for an extended period of time and irreparable damage to local businesses 9. It is already very difficult to find a GP, dentist or a school with places in the area. The addition of 556 families will place an unbearable burden on the existing services as well as local hospitals. The population is already struggling to access these services 10. The Northern Line is already very crowded, even now when passengers are limited due to the pandemic. There are very large developments in Mill Hill already putting a strain on the services. Most of the new properties using Mill Hill East where the trains come very infrequently would place increased pressure on the Northern Line at Finchley Central Station. There is a lot of development near Colindale station. The increased passenger load would put extreme pressure on the Northern Line which is already struggling. There are limited bus services in Finchley Central with only one bus going into the centre of London. 11. The lack of parking ignores the reality of the needs of the population. Whilst we all know that it is the aim of Barnet (and other local authorities) to reduce the use of cars and require people to cycle or walk where possible. It is not always possible as people have to care for elderly relatives, undertake family shopping, or take children to different schools. There are many situations in which use of a car is necessary and this plan has no regard for this. 12. It is documented that the population of Barnet has a higher proportion of elderly residents than all other London boroughs. The lack of parking will impact on these residents and their families unable to assist them <p>For the reasons stated above, we consider that if this development goes ahead it will be a disaster for the residents of Finchley and will create a stain on the good name of L B Barnet. We are not "Nimbys" - our backyard is already overcrowded and the services of medical, transport and health are already overstretched. We urge you to reconsider and reject this misconceived proposal."</p>

Representor	Section	Summary of Comments
Carolyn Ison	Site 30	<p>I strongly object to the proposal to build tower blocks for the following reasons: Currently there are well over 600 units being completed in Mill Hill without any visible infrastructure. The nearest underground is Mill Hill East. The nearest shop is Waitrose and the car park there is already stretched to its limits. Trains are infrequent and the majority of passengers traveling north have to change at Finchley Central. Has Barnet Council considered the knock on effects to the area from this development? The car park in Finchley Central serves people with disabilities and many older people who have no other means of getting to work unless they can park at the station. Reducing the size of the car park will have a devastating effect on their lives and the wellbeing of their families. How will we be able to drive to the station to collect or deliver elderly relatives and grandchildren? It is clearly desirable to clean up the area around the station and to provide cleaner and better looking entrances and exits but there is clearly no desire to have 20 storey tower blocks towering over our village and changing its character and our enjoyment of the area for ever. It would bring a raft of problems frequently associated with tower blocks. How will Barnet Council ensure the health and safety of residents? There are currently at least 2 new reasonably tall blocks of flats within minutes of Finchley Central many of which are rentals and another huge development proposed for Regents Park Road. As it is, it is almost impossible to find an NHS GP or an NHS dentist in the area and a dearth of primary school places. Parking in side streets would be worse than it is already as would all approaches to the main road for those residents already living in Church End. Regents Park Road (a main thoroughfare) would be permanently gridlocked with an additional 2000 people living on top of the station plus the 1000 or so new residents in the new blocks. The proposal to build such huge tower blocks is part of a larger proposal for FC. The latest proposals to create a community square is unnecessary as we have two large parks nearby and it would only be used infrequently by a tiny percentage of people living in the area because of the weather. It would not foster an increase in community spirit. I am convinced this proposal has been put forward to sugar coat the larger unwelcome proposal to increase the population density in Finchley Central. It would, however, produce more litter and Barnet have a problem clearing away our litter and waste already without more residents in an already over-crowded small area which is full of takeaways. Would it not be better to spend the money on improving the education of our children, repairing our roads, and helping the poorer members of our community? Dollis Park is a Conservation Area - many new blocks have already been built in the area. Has Barnet Council considered the question of density? There will also be a loss of light and sun when these hideous giant towers are erected, not to mention traffic congestion on a main north/south road which is almost at a fullstop for most of the time causing pollution and other problems to parents whose children go to different schools and who may be carers for their parents, to the disabled and others, who need to get about in a car. Will there really be affordable housing or will the developers take the best units for themselves? I hope Barnet Planning will be able to overturn this proposal and will not bow to the whims of developers and overseas financiers to support an over-sized development that is simply wrong for so many reasons.</p>
Fenella Young	Site 30	<p>I have lived in Finchley Central for 53 years I am devastated at the proposal to destroy both the character and ambience of the area. Having found it very difficult to navigate your website regarding objections to the above proposal and not having found an official form to fill out. Here are my objections to the planned development:-</p> <ol style="list-style-type: none"> 1. To build 556 residential units to include 4 x 20 storey tower blocks in an area of low rise property brings this into a description of urban not suburban which Finchley has always been. This smacks of the 1960's and what a disaster those buildings were. It has surely been proved that the health of those in high rise buildings however attractive the drawings are, is generally poor. 2. I understood that the Barnet policy only permits the construction of buildings over 15 storeys under exceptional circumstances. There is nothing to prove this is the case. 3. The proposal does not include sufficient parking and includes a "micro park" which is so small to be laughable. The present car park which provides essential spaces for those working out of the borough and for them to use the station to reach their workplace which leaves them without the means to do. It also ignores the needs of the present population most of whom do not or cannot cycle everywhere. They have not taken into account the fact that this borough has one of the largest number of elderly citizens. 4. This proposal will completely paralyse the traffic around the scheme and cause tremendous pollution as the traffic will have to be diverted to side streets. The traffic in the Ballards Lane is congested a lot of the time anyway. This will affect all the small businesses in the area which are struggling at the moment. A development of this size (totally inappropriate for the area) will cause pollution in the whole area. 5. The lack of provision for schools, surgeries and dentists in the area is patently obvious and there will be problems for those who rent or buy there as well as those that already live in the area and struggle to find places or GP surgeries which are open. Let alone dentists. <p>Finchley will become overcrowded and an unpleasant place in which to live, losing its total identity. It ignores the needs of the present population. Whilst I understand that TFL are in need of realising funds this should not be at the expense and health of Finchley Central residents. I trust this letter will join all the other objections.</p>

Representor	Section	Summary of Comments
TFL (Spatial Planning)	Site 30	We welcome the requirement that the development should reflect the Healthy Streets Approach with improved interchange facilities for pedestrians and cyclists.
Ivor and Tirza Jacobs	Site 30	As a resident my wife and I very much object to the proposal currently being put forward. There are many reasons for this that we know have been pointed out to you. The main one, as we see it, is the ability of the area to cope with the increase in traffic, both vehicle and pedestrian and the provision of services for their needs. The underground could be overwhelmed with the people also from the new Mill Hill developments. The parking and traffic even now at the Finchley Central end of Dollis Park is often chaotic. We feel some development does need to take place but at a realistic scale of less than half of current proposals.
Sara and Leor Okrent	Site 30	We are writing in response to the proposed development of 556 homes on the car park of Finchley Central station, in four massive 20 storey high rise blocks. This proposal is completely out of character for the local area, and will tower over our already shabby high street. It will be a blight on the area of low rise residential streets. More importantly there is no provision for the necessary infrastructure and services (doctors, dentists, schools, transport, parking) to accommodate over 500 more households. Schools in the area are already over subscribed and doctors and dentists already have full lists. There is also no provision for suitable outdoor recreational space for 500 more households leading to a poor quality of life for the new residents, and arguably a reduction in quality of life for everyone in the local community. In addition, as both home and business owners in the area (we own a high street business on Regents Park Road and live very near Finchley Central Station), we are extremely concerned on the impact of traffic congestion caused by both the building process and final development itself. This could make the area impassable for months at a time and could be catastrophic to our livelihood. We urge the council to reconsider this development which we think has the potential to utterly ruin this area.
Roger Chapman Ramblers Herts & North Middlesex	Site 30	This site lies near to the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network.
TFL (Commercial Development)	Site 30:	We appreciate the changes that have been made to address our previous concerns. However, we note that a number of matters have not been addressed in the updated allocation. The site address is incorrect ; in particular the reference to Squires Lane. It should be amended, we would suggest: <i>Squires Lane/ Regents Park Rd / Chaville Way / Nether St / Station Road / Crescent Rd St, Finchley N3 (land adjacent to railway verges and airspace above tracks and Finchley Central station)</i> As we have previously said, the scale of development sought on this challenging site, together with public realm, amenity spaces and other significant public benefits, can only be achieved through the development of one or more very tall building (15 storeys+) in addition to tall buildings (eight storeys +). This would accord with London Plan policies and the town centre, urban location is clearly appropriate for this scale of development. Therefore, the allocation should include sufficient flexibility to enable provision of both tall and very tall buildings/s. The "Proposed uses" still includes reference to: <i>50% residential uses with 50% retained transport infrastructure, commercial uses and car parking</i> We would prefer for the reference to percentages to be removed. However, if retained, it must be clarified that this refers to site area (not the floorspace provided within new buildings) and that it is an approximate figure only. As previously stated, this might be achieved in terms of site area, which includes underground railway tracks, the station and associated operational land and buildings. However, it would be neither desirable or achievable in terms of floorspace and therefore this needs to be clarified. In addition, as stated above, it is not TfL's intention to provide significant amounts of car parking on the site, either for commuters or new residents. Therefore, we suggest an amended "Proposed Uses": The text in [square brackets] would not be needed if reference to percentage is removed. <i>[Across the site: approximately 50%] residential uses with [approximately 50%] retained transport infrastructure, commercial uses and limited commuter car parking reflecting the site's highly accessible location and encouraging the use of public transport and active modes of travel.</i> This clarification would be 'sound'.
Theresa Villiers MP	Site 30	Finchley Central Station - I object to this site being on the list for the same reasons as set out above in relation to High Barnet station car park. This proposal is even worse. The height of the building and excessive number of units makes this proposal completely unacceptable. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals.
Thames Water Utilities Ltd	Site 31	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
Thames Water Utilities Ltd	Site 31	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

Representor	Section	Summary of Comments
		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
TFL (Commercial Development)	Site 31	TfL CD appreciates the amendments made in response to our Reg 18 representations
James Masters	Site 32	Please can you clarify the WARD that the Manor Park Road Carpark is in? On your Draft Local Plan summary document – P5 Site number 32 says 'Golders Green' for the Ward? My understanding from living on the road is that we are East Finchley Ward? Also on P290 of the full document? Considering this is currently parking and the school 50 meters away is running more and more activities that take up all the street parking how does potentially removing this fit with your published parking policies?
Thames Water Utilities Ltd	Site 32	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
Thames Water Utilities Ltd	Site 33	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 .
TFL (Spatial Planning)	Site 33	We welcome the use of residents' only parking controls to ensure that there is no 'overspill' parking.
Thames Water Utilities Ltd	Site 34	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
Thames Water Utilities Ltd	Site 35	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 .
Thames Water Utilities Ltd	Site 35	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
Thames Water Utilities Ltd	Site 36	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 .
Thames Water Utilities Ltd	Site 36	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

Representor	Section	Summary of Comments
		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
Thames Water Utilities Ltd	Site 38	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 .
Thames Water Utilities Ltd	Site 38	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
Bob Hamilton	Site 39	The Burroughs car park (Middlesex University and The Burroughs) Your description above of this car park should read "The Burroughs car park" with no connection to Middlesex University. It fails because: 15 The Burroughs has Right of Way through the car park and is not shown on plan. The proposed development for 6 houses contravenes density, daylight, noise levels. Furthermore it removes disabled parking and a community asset for residents, family visits, healthcarers, business and tradesmen visits. The plan does not conform or fit in this Conservation area. The properties either side & opposite are residential and the adjacent site no. 25 The Burroughs is for Dwellings (Class C3) 5 units.
Thames Water Utilities Ltd	Site 39	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 .
Thames Water Utilities Ltd	Site 39	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
Thames Water Utilities Ltd	Site 4	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
NHS Property Services	Site 4	NHSPS own the freehold to Brunswick Park Health Centre, and a copy of the title plan for the property is shown in Figure 2 below. This comprises of the southern portion of the site, which encompasses the existing healthcare facility only (outlined in red). NHSPS do not own any other portion of the site. Figure 2: Freehold title plan for Brunswick Park Health Centre

Representor	Section	Summary of Comments
		 <p>The proposed site allocation wording states that the site should deliver “50% residential floorspace with 50% floorspace to provide a replacement library and health centre”. Although we support the in-principle allocation of the redevelopment of the site, the provision of an arbitrary floorspace retention figure could work against the principles of NHS estate management programmes, which require flexibility in floorspace and service provision. The site should not be subject to prescriptive policies which seek to retain a percentage of floorspace in a health care use. We therefore suggest that the wording of Site Allocation 4 be amended to remove a nominal amount of floorspace being prescribed for retention in healthcare use. To address the above issues, we respectfully request that the following change be made to proposed Site Allocation 4: Delete the following: Proposed uses / allocation (as a proportion of floorspace): 50% residential floorspace with 50% floorspace to provide a replacement library and health centre Replace with: Proposed uses / allocation: Residential floorspace, along with a replacement library and health centre. It is noted that the proposed site allocation includes an indicative residential capacity of 16 units. Given that capacity testing is yet to be undertaken at the site, NHSPS respectfully request that this proposed number of units is removed. No indication of residential capacity at the site should be confirmed in a Local Plan document until capacity testing has been undertaken. Finally, it is noted that the site is listed under ‘ownership’ as a Council owned asset. This is not accurate as NHSPS own the freehold for the Brunswick Park Health Centre. We respectfully request that the ownership status of the site is amended to reflect NHSPS’ ownership of part of the site.</p>
Roger Chapman Ramblers Herts & North Middlesex	Site 4	Use the opportunity to improve walking and cycling access to the primary school and to Brunswick Park open space.
Historic England	Site 40	We understand that the Council has now adopted an SPD to guide redevelopment of this site. As such, we would simply direct you to our advice letter dated 19th July 2021 (ref PA01159685) regarding the Hendon Hub proposals for details of our position. We continue to consider that any buildings proposed to replace the existing Meritage Centre should be low-rise to avoid adverse impacts on the conservation area. I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.
Thames Water Utilities Ltd	Site 40	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

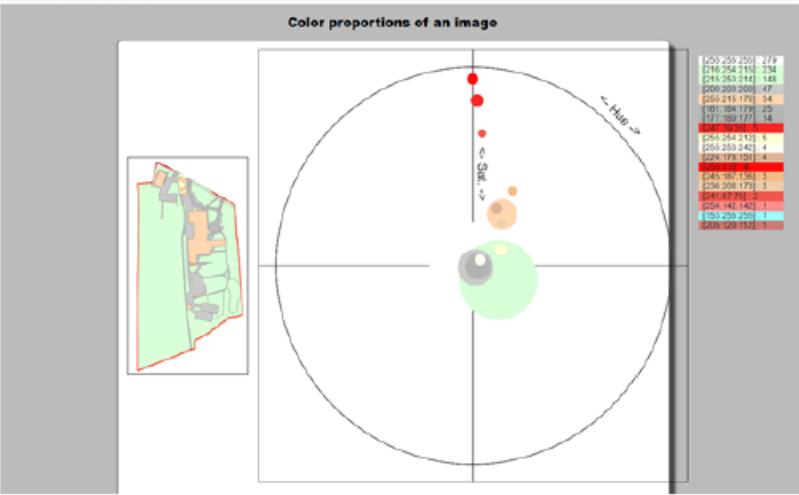
Representor	Section	Summary of Comments
		will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan 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 .
Thames Water Utilities Ltd	Site 40	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
Thames Water Utilities Ltd	Site 41	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 .
Thames Water Utilities Ltd	Site 41	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
Thames Water Utilities Ltd	Site 42	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 .
Thames Water Utilities Ltd	Site 42	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
Thames Water Utilities Ltd	Site 43	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
Helen James and Tom Hearnden	Site 43	Territorial army base plans - 1) The size of the plot seems inadequate to allow families and individuals to thrive, given the number of homes being proposed. How can over 190 'homes' be proposed on that space with enough space to live healthily and happily? The current pandemic has demonstrated that adequate indoor and some sort of private outdoor space is crucial. Even though the pandemic is becoming more controlled more people continue to work from home more often, meaning that the requirement for space to work from home and space to be outside at home is still a key requirement in the 'new normal'. The number of homes being proposed gives no assurance that this has been considered. 2) The plan doesn't indicate what type of properties are being planned. Buildings which are higher than that currently on the road would be out of character of the local area and could overlook many of the nearby properties which would be extremely unwelcome. We are very lucky to live in such a green area - building high rise accommodation would be extremely distressing for people who live nearby. 3) The number of properties being planned would introduce significantly more people to the local area. It looks to be a higher number than that being proposed at Barnet Station which appears to be a much larger site, which is absurd. The infrastructure in Barnet is already stretched: traffic on the high street is consistently horrendous, the GP surgery seems overwhelmed when dealing with the basics, littering in St Georges' fields and on the Green is getting

Representor	Section	Summary of Comments
		worse, not better and the quality of some of the roads in the area is frankly dangerous. An increase in traffic and noise and disturbance, along with the additional strain of a significant increase in the number of people living nearby is a genuine concern for those of us living here. 4) We live in a conservation area and (rightly) have extremely tight restrictions on what we are able to do to our properties to maintain the appearance of the local area. We have a genuine concern about the design and appearance of the development and the impact that this may have on the building and conservation area which we have worked hard to maintain. 5) How is the perceived increase in parking proposed to be managed? The volume of properties being proposed would indicate a sizeable increase to the number of cars and traffic, with an increase of people trying to park locally. The roads from Puller Road to Byng Road are already at capacity in terms of the number of people trying to park and the roads close to Hadley Green are equally stretched. How can the volume of properties currently being proposed allow adequate parking facilities for the people living there without impacting on the existing residents? Barnet Station - I also have concerns about Barnet Station proposals which would remove all car-parking facilities. In addition, the number of properties being proposed at that site seems excessive given that people need and want more internal space with some external space as people continue to work from home more. I appreciate there is a need for new housing, but this should be done with consideration for all parties - current residents and new residents, and I don't feel these plans have given consideration to either.
TFL (Spatial Planning)	Site 43	Any improvements to road junctions should follow the Healthy Streets Approach.
Theresa Villiers MP	Site 43	Army Reserve depot Chipping Barnet Opposed because of the overdevelopment this would involve. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals
Thames Water Utilities Ltd	Site 44	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
TFL (Commercial Development)	Site 44	TfL CD appreciates the amendments made in response to our Reg 18 representations. We will be seeking a development partner to deliver our housing-led scheme on this site later in the year and intend to submit a planning application later in 2022. Therefore, the “Development timeframe” should be brought forward to the next five years. In our view the description of “Proposed uses / allocation (as a proportion of floorspace)” is currently unsound because it is unclear and unfeasible. As currently written, it suggests that 25% of the floorspace of the development should be provided as “commercial uses”; <i>it is not clear whether the “public realm and public car parking” also falls within the 25%. Certainly the provision of 25% for “commercial uses” would be unfeasible, would compete with the designated high street and would not accord with officers’ pre-application advice and Council aspirations.</i> It is TfL’s intention to provide a mix of uses on the site which delivers the housing that Barnet needs and commercial floorspace that is complimentary to the high street at Chipping Barnet (and also Underhill). Therefore we propose the following amendment to the “Proposed uses”: <i>75% Residential-led with floorspace with 25% commercial uses, public realm and limited commuter public car parking reflecting the site’s highly accessible location and encouraging the use of public transport and active modes of travel. Designated within UDP (2006) as Site 26 supporting B1 uses, hotel and leisure.</i> We have also deleted the reference to the UDP as it is out-of-date and no longer relevant.
Barnet Society Committee	Site 44	We generally support the building of some housing and upgrading of the public realm on this site. But a great opportunity to reconfigure High Barnet as a transport modal interchange is being lost. We are also highly critical of the overbearing mass of 6-7 blocks proposed (see also our comments on policy CDH04). And we have serious reservations about the loss of so many car parking places (see also our comments on policies GSS09 & 12). In our view, the indicative residential capacity of 292 dwellings is greatly over-optimistic. The quantity of proposed homes should be significantly reduced and the number of car parking spaces increased.
TFL (Spatial Planning)	Site 44	We welcome the requirement that development must reflect the Healthy Streets Approach with improved interchange facilities for pedestrians and cyclists.
Roger Chapman Ramblers Herts & North Middlesex	Site 44	Provide pedestrian bridge over the railway line to Potters Lane (as it is not possible to provide a footway down the east side of Barnet Hill south of the station slip road)
Theresa Villiers MP	Site 44	High Barnet Station - I am totally opposed to this site being included in the Schedule given the importance of retaining the car park for public use and the overbearing nature of the proposal (6-7 blocks). I believe that the site set out above should be withdrawn from the Schedule of Site Proposals.

Representor	Section	Summary of Comments
Queen Elizabeth's School	Site 45	'Land at Whalebones'. The site is located to the south of the School on the opposite side of the A41 (Figure 3). The draft Plan proposes allocating the site for 152 dwellings, local open space and community facilities. The School wishes to comment upon the proposed allocation to request that the Council secure appropriate provisions (both during construction and operational phases of the development) within the Plan to prevent any undue impacts upon the School's operation and ensure pupil safety.
Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	Site 45	The NPPF is clear that plans need to provide a 15 year time horizon on adoption. Given that the plan is unlikely to be adopted until 2022 to the earliest, the plan period needs to extend until 2037 at least. Given the length of time local plans are currently taking in general, we consider 2038 would be a lower risk option. As noted above, Hill and Trustees are fully supportive of the principles of the Proposed Site Allocation to deliver a residential-led development, with local open space and community facilities. We note that in the draft Local Plan the site is subject to the following: Proposed Site Allocation 45 Land at Whalebones (on pages 353 to 354); and is within an Area of Deficiency in Access to Public Open Space – as illustrated in Map 7 "Public open space deficiency". The Proposed Site Allocation should be renamed to "Land adjoining The Whalebones" as this would accurately describe the site. This is because The Whalebones itself does not form part of the site and is in separate ownership. As currently drafted, the name of the Proposed Site Allocation could mislead and is likely to result in confusion. We also note that the site size detailed on page 353 of the draft Local Plan states 2.20 hectares. However, this should be updated to read 4.3 hectares which would reflect the red line boundary of the attached Site Plan. We propose that the site allocation boundary be amended to correspond to that for which the planning application was submitted (but excluding the public highway land). These changes would ensure that the redevelopment potential of the Proposed Site Allocation is accurate and the Publication Local Plan would therefore be positively prepared to deliver the aspirations of the Proposed Site Allocation. Whilst Hill and Trustees support the indicative residential capacity of 152 units it should be made explicit that the figure is not a maximum requirement. It is noted that in Table 4 'List of Sites – Summary Table' on page 290 of the Publication Local Plan states 149 in the "Indicative Units" column. This should be updated to state 152 units so that it is consistent with page 354 on the Publication Local Plan. It should also be made explicit that the figure is not a maximum. This would ensure that the Publication Local Plan is positively prepared and effective in its delivery of new homes, as well as affordable homes. With regard to the proposed uses / allocation as a proportion of floorspace detailed on page 354 of the draft Local Plan, Hill and Trustees are fully supportive of the proportion of floorspace for 90% residential and 10% local open space and community facilities. Hill and Trustees fully support the aspiration of delivering public open space on site which is a significant public benefit as the site is currently private and not, and has never had any right of public access. The site is also within an Area of Deficiency in Access to Public Open Space, therefore the delivery of new public open space as part of the wider redevelopment of the site would be a substantial public benefit and is fully supported and considered to be justified and consistent with national policy. It must also be recognised that the London Plan does not meet London's needs as set out by the Secretary of State in his letter to the Mayor of 29th January 2021. The Proposed Site Allocation is an opportunity for a sensitive, high quality, residential-led development on the site which would significantly contribute to the significant housing need. As noted above it must be made clear that the indicative residential capacity of 152 units of the Proposed Site Allocation should not be considered as a maximum requirement. This would ensure that the Proposed Local Plan is positively prepared and effective in its delivery of new homes, as well as affordable homes.
Thames Water Utilities Ltd	Site 45	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
Barnet Society Committee	Site 45	The proposal is unsound because it is in flagrant breach of Barnet Council's own policies regarding Conservation Areas and open spaces, as well as the Mayor of London's environmental and farming policies. We are also opposed to the building of so many homes on this site, and wish to see more imaginative use of the open space, preferably for educational, therapeutic and food production purposes. The site should be allocated a fraction of the proposed number of homes, or omitted altogether. Yes – because the Barnet Society has played a leading role in opposing development of this type and scale, which contributed to the refusal of the planning application in November 2020.
Theresa Villiers MP	Site 45	Land at Whalebones - It would be completely wrong to develop this green field site in a conservation area. The council's planning committee was correct to turn down the recent planning application and should not have their decision undermined by including the fields in the Reg 19 sites list. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals.
Thames Water Utilities Ltd	Site 46	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

Representor	Section	Summary of Comments
Mill Hill Preservation Society	Site 46	This site was included in the Millbrook Park land use strategy as 'employment' and it should be retained as such. (see accompanying letter) This site was showing as Residential with 20% B1 uses in Reg.18 Plan and is now showing as residential only and the employment use (formerly B1 use) has been dropped. The site was used as part of the evidence base for the adjacent Millbrook Park development. As part of that application this site was used as justification for the development mix on this adjacent site, with all employment provision being provided on the IBSA House site. There has been no evidence provided to demonstrate why this employment use is no longer required, particularly when para 4.5.1 of the draft Plan indicates that an additional 27,000 jobs are now required to support the housing growth within this Plan period. The loss of the employment uses in favour of increased residential provision is not deemed sustainable and only serves to actively encourage movements out the area, contrary to 'the fifteen-minute neighbourhood' as set out in the Local Plan – for example see para 2.1.4.
TfL (Spatial Planning)	Site 46	We welcome that 'the potential for the development to increase traffic must be assessed and mitigated.' This may require public transport or active travel improvements as well as offering alternatives to car ownership.
Roger Chapman Ramblers Herts & North Middlesex	Site 46	Footpath connectivity across this site should be explored and provided.
Thames Water Utilities Ltd	Site 47	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 .
Thames Water Utilities Ltd	Site 47	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
TfL (Commercial Development)	Site 47	TfL CD appreciates the amendments made in response to our Reg 18 representations. However, we would suggest changes to the "Proposed Use" to be consistent with the approach to re-provision of commuter car parking on TfL sites (and therefore sound): "60% residential floorspace residential-led with 40% retained rail infrastructure and limited commuter car parking reflecting the site's accessible location and encouraging the use of public transport and active modes of travel."
Elizabeth Silver and 18 Co-Signatories	Site 47	1. Non-Compliance with Duty to Cooperate, with Mayor and TfL The Mayor's comments have been disregarded. From Appendix B Reg 18 Schedule of Representations & Responses p.10: " 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 ". TfL says the same on p. 195. TfL states (ibid. p.46) "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.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." 2. Unsound and Not Legally Compliant Contravention of London Plan Policies T3 and T5: Building on the surrounds of Mill Hill East Station will impede expansion of train capacity which is central to the Barnet Plan for dominant use of public transport (Reg 19 11.5 and Policy TRC01). Thousands of homes are being built e.g. on the Ridgeway that are not within walking distance of the station and that have a reduced number of car parking spaces, with the expectation that public transport and cycling will become the main forms of transport. Therefore parking for cycles in the hundreds will be essential. The car park at Mill Hill East holds 42 car parking spaces. This could be converted to only about 160 cycle spaces, so building on the station car park is unsound. At present, 50 % of the total area, as calculated from the figure in Local Plan Reg 19, is taken up by rail infrastructure and parking. The Local Plan Reg 19 states 40% should be rail infrastructure and parking, which is a 20 % decrease. Taken in conjunction with the thousands of new homes in the area, this

Representor	Section	Summary of Comments
		<p>decrease is not feasible because it will lead to overcrowded public transport at Mill Hill East. To allow for enhanced capacity, the unused land should be reserved for a possible second track and platform within the station itself.</p> <p>To Legally Comply with London Plan Policies T3 and T5 and to make Sound: Remove plans for dwellings on Mill Hill East station to allow for increased train capacity, increased footfall and to reserve space for extra cycle parking.</p> <p>Remove the site as part of Mill Hill East Growth Area</p>
Roger Chapman Ramblers Herts & North Middlesex	Site 47	This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network
Thames Water Utilities Ltd	Site 48	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
Victor Montefiore	Site 49	<p>A. The local plan annex states 80% of the 7.31 hectares, i.e. 5.85 hectares, of the site should be retained as undeveloped green belt.</p> <p>B. The sales particulars for the site say that the western parcel is 38,565m² (i.e. 3.86 hectares) and the eastern parcel is 32,629m² (i.e. 32.6 hectares) totalling 71,194m² (7.12 hectares) [1,2]</p> <p>C. The sales particulars for the site say that the undeveloped green belt on the western parcel is 38,064 m² (i.e. 3.81 hectares) and the eastern parcel is 28,058m² (i.e. 2.81 hectares) totalling 66,122m² (6.61 hectares), that is to say 92.88% of the current site is undeveloped green belt. [1,2]</p> <p>D. Systematised graphical analysis of the built areas of Barnet's site map gives a similar percentage - that is to say 91.4% of the site is undeveloped green belt [3]</p> <p>E. On the 16th March 2020 Debbie Jackson, GLA's Director for the Built Environment, wrote to Nick Lynch stating in relation to site 49 that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt"[4 (see page 11)] and "Draft Local Plan Policy GSS07 – Mill Hill East should make it explicit that Green Belt must not be developed, except on previously developed land." [4 (see page 3)]</p> <p>F. Barnet responded "Agreed – GSS07 revised" and with regard to site 49 Barnet responded "Agreed. Proposal reflects this".[5]</p> <p>G. However Barnet's responses were duplicitous (not duplicative) and non-cooperative because whilst para 5 of GSS07 was revised, para 3 of GSS07 was not revised to account for the reduction in the number of new residential units that could be delivered i.e. the figure of 547 needs to be revised downwards as it is based on the erroneous estimate of 224 units on site 49, which in turn is based on the erroneous calculation of 80% of the site being undeveloped green belt.</p> <p>H. Note that planning application W03005AJ (September 1997) "Excavation to provide a hard surfaced tennis court and surrounding fencing" (and similar) does not constitute a building on the green belt such that a building could be erected on this part of the footprint.</p> <p>[1] Source: https://web.archive.org/web/20210725180220/https://ibsaproperty.com/properties/watchtower-house/ and https://ibsaproperty.com/properties/watchtower-house/</p> <p>[2] Source: https://web.archive.org/web/20210725180417/https://ibsaproperty.com/properties/conf-centre-and-open-field/ and https://ibsaproperty.com/properties/conf-centre-and-open-field/</p> <p>[3] Source: Representation sent in relation to Reg 18 sent by Victor Montefiore on 15th March 2020 and illustrated overleaf</p> <p>[4] Source: https://www.london.gov.uk/sites/default/files/PAWS/media_id_491869/Mayor%20Response%20Barnet%20Reg%2018%20final.pdf</p> <p>[5] Source: https://barnet.moderngov.co.uk/documents/s65265/Appendix%20B%20-%20Barnets%20Local%20Plan%20Schedule%20of%20Representations%20and%20Responses%20to%20Preferred%20Approach%20.pdf</p>

Representor	Section	Summary of Comments
		 <p>Undeveloped Green Belt count (green plus grey) = 234 + 148 + 47 + 25 + 14 = 468 Existing footprint of the building (orange) = 34 + 4 + 3 + 3 = 44 ⇒ Undeveloped Green Belt = 468 / (468 + 44) = 91.4%</p>
Victor Montefiore	Site 49	<p>A. The percentages in the statement "80% retained as undeveloped Green Belt with 18% residential and 2% community floorspace" in the annex for site 49 need recalculation based on Barnet's commitment to the GLA that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt" etc.</p> <p>B. The 'Indicative residential capacity' in the annex for site 49 of 224 needs to be recalculated based on Barnet's commitment to the GLA that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt" etc.</p> <p>C. The figure of 547 in para 3 of Policy GSS07 "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" needs recalculation based on Barnet's commitment to the GLA that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt" etc.</p>
Douglas Keely	Site 49	<p>Firstly, I am happy with the legal compliance of the plan. However, I would like to enquire regarding site #49 – Watch Tower House and Kingdom Hall on The Ridgeway, Mill Hill, NW7 1RS. Please could you confirm that the proposed use of "80% retained as undeveloped Green Belt with 18% residential and 2% community floorspace" for this site will remain as it is in the planning proposal. In other words that there will not be any change of use to the large green field on this site (which is covered by Green Belt). This is a point that needs firm confirmation and that is not clear in the planning proposal</p>
Marstead Living Limited/IBSA	Site 49	<p>This allocation, as drafted, is considered not legally compliant and unsound on the basis that it is not consistent with national policy and not fully justified in respect to the extent of developable land and the required land uses. The proposed uses/allocation states "80% retained as undeveloped Green Belt with 18% residential and 2% community floorspace". No justification is provided for the inclusion of the 18% and 2% figures. Previously Developed Land It is assumed that the 2%/18% figures may be intending to reflect the extent of existing previously developed land on the site. If this is the case, then the figures are incorrect. Previously Developed Land (PDL) is defined at NPPF Annex 2: "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape." The entirety of the Watchtower House (WTH) part of the site comprises PDL (for the purposes of the NPPF definition), in that it is land which is occupied by permanent structures and associated fixed infrastructure (including the associated curtilage). However, it should not be assumed that the whole of the site can be developed (with reference to NPPF para 149(g)). A reasonable application of this would be that if the extent of land</p>

Representor	Section	Summary of Comments
		<p>within the site proposed to be developed with permanent structures and associated fixed infrastructure (and the landscape spaces immediately in between them) (the 'developed envelope') was equal to or less than the existing, then this should be acceptable in principle. The extent of the existing 'developed envelope' of the WTH site is 17,264sqm. This equates to 23.8% of the whole site allocation area, rather than the 18% suggested by the draft allocation (please see appended Existing Site Area Plan). The northern part of the KH part of the site comprises PDL. It comprises a 'developed envelope' which extends to 3,190sqm. This equates to 4.4%, rather than the 2% suggested by the draft allocation. It follows that a proposed developed envelope that is equal to or less than this should be acceptable in principle (please see appended Existing Site Area Plan).</p> <p>Land Uses – Residential - Policy H13 (Specialist Older Person Housing (SOPH)) of the London Plan advocates that Boroughs should identify sites suitable for SOPH. In doing so they should 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. In order for the plan to be sound as a whole, it should identify specific sites to accommodate SOPH needs (linked to Policy HOU04). Site ref. 49 is an example of a proposed housing allocation site that would be suitable in locational terms for SOPH (and the landowner is keen to bring the site forward for SOPH development) and therefore should be considered as an appropriate site to be allocated for conventional housing 'and/or' SOPH. The following points are relevant:</p> <ul style="list-style-type: none"> • There is a clear need for SOPH as shown in the Local Plan targets and LBB evidence base; • The 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: <ul style="list-style-type: none"> ○ 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 ○ The 221 Bus Route stops 150m to the south of the site, along Engel Park, and runs between Edgware Bus Station and Turnpike Lane Station. <p>Land Uses – Community - The requirement for 2% community use floorspace is not justified. Context - The site forms part of a group of sites located off The Ridgeway in Mill Hill that are currently (or have until recently been) owned and occupied by the International Bible Student Association (IBSA). IBSA is a registered charity of the Jehovah's Witnesses in Britain. Its charitable aims are recorded at the Charity Commission as: 'Promoting the Christian religion by helping congregations of Jehovah's Witnesses and others with their spiritual and material welfare. This includes providing facilities for printing bible literature and housing volunteers engaged in this. Also, we buy religious literature and distribute free to all who will read it. Conventions for Christian education are arranged and the public are invited' In order to accomplish these purposes, IBSA produces magazines/brochures and similar online content, alongside undertaking other activities. It accomplishes this work with the help of volunteers ('Members'). Members are not employees, however receive board and an allowance to cover their expenses for the period of time that they are volunteering, which typically ranges from a few weeks to several years. Members originate from all over the world and the principle is that Members live and work on the same site (or as close to as possible). Until recently, these activities were undertaken from a group of sites in/around Mill Hill, as follows: (1) Watch Tower House;</p> <p>(2) IBSA House and associated printworks (200m to east of Watch Tower House): administrative accommodation and printing facilities associated with the production and distribution of IBSA's magazines. This site is subject of a planning application for residential redevelopment which was approved at committee on 06/04/21 (ref. 19/6551/FUL);</p> <p>(3) Kingdom Hall: conference and meeting facility; and</p> <p>(4) A portfolio of residential and commercial properties in the local area which were acquired on an incremental basis to support the expansion of the Association. In 2014 IBSA took the decision to acquire a 33ha site known as Temple Farm at West Hanningfield near Chelmsford with the aim of replacing its existing accommodation in/around Mill Hill with a new purpose built single consolidated facility (an estate rationalisation strategy). Chelmsford City Council (as Local Planning Authority) granted planning permission (ref. 14/01971/OUT) in 2015 for: 'live/work charity headquarters (sui generis) covering a maximum floorspace of 112,500 sqm & including a printery, accommodation units, offices, a communal dining room, audio-visual studios & recreational facilities together with on-site parking, a new roundabout on the B1007 & site access road, an internal perimeter road and a landscaped belt surrounding the core development area' The Planning Statement which supports the application states that the development includes the following: A printery producing bible-based literature; Warehouses for packing and distribution to national and international destinations; Offices used principally for administration and translation; Video and sound production studios; An auditorium (used for meetings, conferences, dinners and other functions); Maintenance workshops and storage; An energy centre; A maximum of 594 one and two bedroom accommodation units for IBSA Members and visitors; Residential support facilities (e.g. laundry);</p>

Representor	Section	Summary of Comments
		<p>Health care facilities;Recreational facilities; A visitor centre; and Car parking, Infrastructure, and other associated works. The new development is almost complete. In addition, a new Kingdom Hall (to be used for congregation meetings) is nearing completion on the site pursuant to a separate planning permission. IBSA relocated its operations from Mill Hill to the new facility in early 2020, with the exception of a skeleton group of mainly caretaking and maintenance volunteers who remain in Mill Hill for the time being. Accordingly, the portfolio of sites in/around Mill Hill are now redundant, vacant (or are about to be vacated), and are being disposed. All of the existing accommodation, facilities, uses, and functions that were previously provided at the sites in/around Mill Hill have been re-provided to a better standard in both quantitative and qualitative terms at Temple Farm, where all Members (i.e. the users of the site) have relocated (or are relocating) to. Loss of the Existing Use The Kingdom Hall part of the site currently accommodates a vacant single large building most recently used as a Kingdom Hall of Jehovah's Witnesses. It operates under planning permission ref. W03005AB which allows the building to be used as a place of worship (with associated car parking). We consider this to fall within Use Class F1(f) (public worship or religious instruction (or in connection with such use)).In practice the building was historically used for conferences, lectures, volunteer training, congregation meetings, and weddings. While in our view the site comprises a standalone planning unit, it functioned as a piece of infrastructure (or ancillary use) that supported the IBSA activities operating in/around Mill Hill, in that its primary purpose was to provide meeting/function space for Members based at these sites. The location of the need for the meeting space has now shifted to Chelmsford (where Members have relocated to) where a new replacement facility has been provided (the auditorium), and an additional Kingdom Hall is in the development pipeline. The skeleton staff that remain on-site for the time being have joined congregations at other existing Kingdom Halls in Friern Barnet and Hendon, both of which have capacity to expand the number of attendees. Historically, public access/use of the building was possible only in very limited circumstances. Members of the public were welcome to attend congregation meetings which typically took place at set times 1-2 times per week, however in practice IBSA Members resident at Watch Tower House and other IBSA sites in/around Mill Hill made up the overwhelming majority of attendees. Individual members of the public were also able to attend specific other meetings from time to time with prior invitation only, however this was very limited. The existing facility has been reprovided in a more appropriate location to satisfy social needs and this has not caused a shortage of provision of such facilities or any other harm/deficiency in/around Mill Hill. In our view, this satisfies London Plan Policy S1 and draft Local Plan Policy CHW01 (which it should be read in conjunction with), and therefore there should be no policy issues associated with the loss of the existing use. The remainder of the site (Watch Tower House) is a Sui Generis use not a community use, therefore there are no policy issues associated with its loss. Need for Alternative Community Uses There is no evidence of a need for an alternative community use on the site, and restricting 10% of the site's developable area to community uses would prevent other needs being met (for which there is demonstrable evidence). The allocation should be amended to confirm that the extent of the future developed area should not exceed the extent of the existing developed area, which should be measured in line with the NPPF definition of previously developed land (deleting the 2%/18% figures) or replace the 2%/18% with the more accurate (justified) measurements of 4.4%/23.8%. The allocation should identify that residential (conventional housing and/or SOPH) should be the main use and that community uses are also acceptable (but not required). To be considered effective and justified, the amount of community use should not be prescribed as a quantum but should follow the requirements outlined by Policy CHW01</p>
Thames Water Utilities Ltd	Site 49	<p>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</p>
Geoffrey Silver	Site 49	<p>1. The proposal for Green Belt and Conservation Area Site No. 49 Watch Tower House & Kingdom Hall is not legally compliant with The London Plan of March 2021. The proposal to include Green Belt Site 49 in the Mill Hill East Growth Area, and so increase the residential units from the current 85 in Watch Tower House (none in Kingdom Hall) to an indicative capacity of 224, is contrary to The London Plan as follows:</p> <ul style="list-style-type: none"> • Policy G2 (Green Belt) para A1: "development proposals that would harm the Green Belt should be refused except where very special circumstances exist" • Para 8.2.1: "The Mayor strongly supports the continued protection of London's Green Belt." • Para 8.2.2: "Openness and permanence are essential characteristics of the Green Belt" • Policy G6 (Biodiversity) paras A, B1 and B3: A: "Sites of Importance for Nature Conservation (SINCs) should be protected", relevant because Site 49 is contiguous with the Drivers Hill SINC. B1: "... identify SINCs and ecological corridors to identify coherent ecological networks", relevant because there is an ecological corridor from Drivers Hill through site 49 to adjacent gardens in Bittacy Park Avenue and Engel Park. • Policy G6 (continued):

Representor	Section	Summary of Comments
		<p>B3: "... support the protection and conservation of priority species", relevant at the least to badgers photographed in Bittacy Park Avenue gardens, and barn owls.</p> <ul style="list-style-type: none"> • Policy G7 (Trees and Woodlands) para A: "woodlands should be protected", relevant because the Jehovah's Witnesses were allowed to replace publicly accessible woodland with a spacious garden for Watch Tower House, albeit constrained by Tree Preservation Order TRE/HE/6 dated 1953. <p>In summary, in the 1950's, Watch Tower House replaced the single residential unit of Bittacy House, and now to include this Green Belt site in the Mill Hill East Growth Area and propose a further almost tripling of residential units from 85 to 224 is to effectively propose its continued destruction by obviously large steps, even though, at public presentations I have twice been told "we don't intend to extend the footprint."</p> <p>2. The proposal for Green Belt and Conservation Area Site No. 49 Watch Tower House & Kingdom Hall is unsound with respect to the NPPF of July 2021. The proposal to include Green Belt Site 49 in the Mill Hill East Growth Area, and so increase the residential units from the current 85 in Watch Tower House (none in Kingdom Hall) to an indicative capacity of 224, is contrary to the NPPF as follows:</p> <ul style="list-style-type: none"> • Chapter 12 (Good Design), para 127: "... Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics", relevant because all the owners of neighbouring properties strongly object to the proposed huge increase in housing in a site with defining characteristic of Green Belt in a Conservation Area. • Chapter 13 (Protecting Green Belt), paras 137, 138, 140, 147 and 149: <ul style="list-style-type: none"> 137: "The Government attaches great importance to Green Belts. 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." 138: "Green Belt serves five purposes:" <ul style="list-style-type: none"> a) "to check the unrestricted sprawl of large built-up areas", in this case the sprawl of Mill Hill East into the Green Belt and Mill Hill Conservation Area. d) "to preserve the setting and special character of historic towns", in this case the Conservation Area of historic Mill Hill Village. 140: "... Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period", but this proposal obviously continues to dismantle the site's Green Belt status. 147: "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." 149: "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: <ul style="list-style-type: none"> c) "the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building" 149 (continued): <ul style="list-style-type: none"> d) "the replacement of a building, provided the new building is ... not materially larger than the one it replaces; • Chapter 15 (Natural Environment) para 174a: "protecting and enhancing valued landscapes, sites of biodiversity ... (in a manner commensurate with their statutory status or identified quality in the development plan)", in this case Green Belt, Conservation Area, and contiguity with a SINC. • Chapter 16 (Conserving ... Historic Environment) para 189: "Heritage assets range from sites ... of local historic value. ... These assets are an irreplaceable resource, and should be conserved". This Green Belt, Conservation Area, and green corridor to the Drivers Hill SINC are heritage assets of local historic value.
Geoffrey Silver	Site 49	<p>Site No. 49. The following changes solve the problems explained under Question 3:</p> <ul style="list-style-type: none"> • Remove "Mill Hill Growth Area" from the title, as Green Belt and Growth Area are diametrically opposed. Site 49 can be more sensitively dealt with outside the Growth Area. • Remove "Major Developed Site in the Green Belt (UDP 2006)" from the Planning Designation as this in itself cannot justify almost tripling the indicative residential capacity. • Adjust the indicative residential capacity down to one which does not extend the footprint, scale, massing and roof height beyond the existing building. <p>For consistency, corresponding adjustments will also be needed in:</p> <ul style="list-style-type: none"> • Map 2 Key Diagram: remove the growth area orange colouring from Site 49 (just left of the words Mill Hill East) to leave it purely green to indicate unambiguous Green Belt. • Map 3E Mill Hill East Area: remove site 49 from this Growth Area map. • Policy GSS07: remove the semi-rural site "Watchtower House" from the para 3 list of sites for suburban growth.
Elizabeth Silver and 18 Co-Signatories	Site 49	<p>1. Unsound - plans for Site 49 not justified • Incorrect classification of site. The term "Major Developed Site in the Green Belt" for site 49 is quoted from the Barnet UDP of 2006 in which Planning Policy Guidance PPG2, then current, stated that development should: iii. Not exceed the height of the existing buildings; and iv. Not occupy a larger area of the site than the existing buildings.</p>

Representor	Section	Summary of Comments
		<p>6Planning Policy Guidance has been superseded by the NPPF 2021 which does not mention the phrase “Major Developed Site in the Green Belt”, so to use it out of context to justify increasing the footprint, is unsound. • Barnet Council states explicitly in Appendix B Reg 18 Schedule of Representations & Responses (pages 175,179,184) that “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. “ Development on this site as proposed will effectively remove this site’s designation as Green Belt.</p> <p>2. Non-compliance with Duty to Cooperate • Mayor’s Comments disregarded The Mayor has stated about Site 49 (in Appendix B Reg 18 Schedule of Representations & Responses p 154): “Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt”. Allowing the built footprint to go up from 7% to 20% (see below) goes directly against the Mayor’s instructions.</p> <p>3. Lack of Legal Compliance and Soundness • Contravention of London Plan Policy G2 and NPPF 2021 Paras 137, 140, 141, 147-149: Any increase in footprint or volume, if permitted, will effectively de-designate the Green Belt and destroy its permanence. The current built footprint is 7.1 % over the two sites: $7.1\% = (4571 + 501) / (32,629 + 38,565)$ https://ibsaproperty.com/properties/watchtower-house/ https://ibsaproperty.com/properties/conf-centre-and-open-field/ “Major development” in the NPPF 2021 is defined as 10 or more homes or 1000 m2 of non-residential floor space. This does not in itself justify increasing the built footprint up from the current 5072 m2. Replacement of hard-standing (e.g. tennis courts used as parking) by buildings three or more stories high, which would occur if the current 7% footprint went up to 20 %, and the present residential capacity of 85 units went up to 224. This would triple the footprint and built volume, which would not be legally compliant in a Green Belt setting.</p> <p>• Contravention of London Plan Policies G1 and G6-B3, G7-B, and NPPF 2021 Para 179: The Watchtower House site forms part of a continuous green corridor going westwards from the gardens of Bittacy Park Avenue to Drivers Hill, a Site of Borough Importance for Nature Conservation Grade II, and is part of an important habitat. Increasing the footprint or building volume will fragment the habitat and be detrimental to biodiversity. A mature oak tree supports thousands of insects and animals so replacement vegetation will have to be more extensive and will take decades to be as effective so we cannot afford to lose mature trees. There are a number of veteran trees with TPOs (TRE/HE/6 1953) on the site. An increase in build volume will inevitably lead to more access roads and ancillary built facilities and some of the mature trees will be felled. This happened repeatedly when the Jehovah’s Witnesses took over the Bittacy House site (94% woodland and green space in 1950s) in the 1960s and gradually expanded the buildings.</p> <p>3. (Continued) Lack of Legal Compliance and Soundness • Inconsistency with other Barnet Local Plan Policies: Loss of habitat would be inconsistent with Barnet Local Plan Policies ECC05 and ECC06. Development on this site also contradicts Policy CDH07 since a development with a larger footprint and volume will mean mature trees removed and they cannot be replaced with a tree of “suitable size and species”.</p> <p>To make the Plan for Site 49 and Map 2, Sound and Legally Compliant • Remove the words “Mill Hill East Growth Area” or “Mill Hill Growth Area” from the title. • Remove the orange colouring from Green Belt Site 49 on Map 2 Key Diagram • Remove the phrase “Major Developed Site in the Green Belt UDP (2006)”. • Change “indicative residential capacity of 224” to “maximum residential capacity of 100”. • Add: “Development should not extend beyond the existing footprint of the buildings and should not have a greater impact on the openness of the Green Belt than the existing development “</p>
Roger Chapman Ramblers Herts & North Middlesex	Site 49	<p>This site lies near to the Strategic Walking network and a public footpath crosses the site. Development proposals should take the opportunity to ensure effective connectivity to this network</p> <p>If the Strategic Walking Network is not adopted: A public footpath crosses the site. Development proposals should take the opportunity to improve the existing footpath and to ensure effective connectivity on foot.</p>
Mill Hill Preservation Society	Site 49:	<p>This proposal infers loss of Green Belt: the site boundary does not comply with NPPF: the inclusion of this site in the Plan as it stands is not sound: the resulting density of development will not take into account the impact on the heritage assets. (see accompanying letter) The 80% retained as Green Belt should be excluded from the allocation boundary. Policy CDH08 needs to be included: The NPPF in respect of Green Belt boundaries needs clarification and as they stand they fail to accord with NPPF else the special circumstances associated with Green Belt release have not been met and the allocation of this site is not sound. See our accompanying letter dated 6th August 2021 for further detail. Site 49: Watchtower House & Kingdom Hall, The Ridgeway NW7 1RS/1RL – We are concerned about this proposal as it seems to infer a loss of Green Belt, something the Society strongly opposes. Due to its location in the Green Belt and the Conservation Area we agree with the stated ‘Site requirements and development guidelines’. In addition, we are clear that the field below the Kingdom Hall, and to the west of the public footpath, should be retained untouched. Furthermore, we do not understand why the original development potential was stated at 219 units which has now been increased to 224 in this version of the Local Plan. As stated above this site is located within both the Green Belt and Conservation Area. It is appreciated that part of the site is classed as previously developed land, however, the proposal allocation covers</p>

Representor	Section	Summary of Comments
		<p>more than double the area of developed land and will remove a significant green pocket from the within the Conservation Area. Again, the Society strongly opposes this. It is noted that the policy seeks to retain 80% of the site as under-developed Green Belt; on this basis, this 80% should be excluded from the allocation boundary. Furthermore, the ever-increasing housing density, based on the development areas set out in the policy will equate to a density of 191.5dph on the development parcel. The impact on protected trees will be extensive and this scale of development will be out of keeping with the character and appearance of the Conservation Area. The policy doesn't, and clearly should, reference policy CDH08: Barnet's Heritage. Para 143 of the NPPF advises that Green Belt boundaries should not include land which it is unnecessary to keep permanently open. It is for this reason that the land identified to be retained as open land on this site, should be retained within the Green Belt. The lack of consideration of the site's constraints and impact on heritage assets fails to demonstrate that this site, at this scale is deliverable, thus resulting in the policy being unsound. Moreover, the Council accept that 80% of the site should be retained as Green Belt but propose to allocate the entire site. This is contradictory in itself, fails to accord with the NPPF and needs to be rectified, otherwise the special circumstances associated with Green Belt release have not been met and the allocation of this site is not sound. Summary There are considerable concerns regarding the efficacy of the above elements of the Plan and therefore its overall soundness. There is a lack of consistency within the Plan as to whether it is a Mill Hill Growth Area or Mill Hill East Growth Area. However, either approach has a direct impact on Mill Hill as a designated Conservation Area, with developments over recent years highlighting this point. The Plan lacks any meaningful consideration of the ongoing impacts of development on what is left of the Conservation Area character and does not therefore adequately demonstrate that this Growth Area is achievable without detrimental effects on the Conservation Area. This completes our comments on the Draft Local Plan V.19 and we look forward to taking part in future hearing sessions as the Plan evolves. MHPS wish to ensure that matters of local concern are raised with the inspector and in order to do this personal representation is considered necessary.</p>
NHS Property Services	Site 5	<p>Montagu Evans LLP acts on behalf of NHS Property Services ('NHS PS') in respect of Edgware Community Hospital ('ECH'; Figure 1). The site boundary has been amended since our Regulation 18 submission because an application was submitted (and validated in January 2021) in respect of the redevelopment of land between the main hospital building and Burnt Oak Broadway. We made detailed representations at the Regulation 18 stage of the local plan in relation to the Edgware Community Hospital site in March 2020. NHS Property Services is a property owner and manager, providing specialist healthcare environments for the delivery of local healthcare services by other parties. Healthcare services are provided by NHS trusts in accordance with local commissioners' requirements. Whilst at ECH some services are delivered from modern accommodation, large parts of the estate are not of the same quality; some buildings are over 100 years old. It is NHS PS's aim to invest in the estate to ensure that occupiers can provide all of their services from modern accommodation that is fit for the future. Such investment is paid for by receipts or income from surplus assets, including from the development of surplus land. Commitment to the Provision of Healthcare Floorspace at ECH In our Regulation 18 Representations we highlighted that the potential development of this site for residential-led development does not mean that it will require current occupiers to leave the site or that it will force any diminution of services. Whilst ultimately NHS PS is a specialist space provider and therefore has no influence over the services that are provided at ECH (services are commissioned by local CCGs), any NHS PS proposals for this site will not require any current occupiers to leave the site; it considers that better use can be made of the land by way of space reorganisation. However, if in the future occupiers do choose to leave the site (for example because they want to provide commissioned services from other sites / locations), NHS PS will explore alternative uses for any surplus land. On page 238 of the Regulation 18 draft Local Plan the following assumption is set out: <i>"25% hospital continuing in use, with associated car parking"</i>. We assume that the reference to <i>"25% hospital continuing in use"</i> should refer to the site area rather than hospital floorspace. On page 299 of the Regulation 19 draft, under the heading 'Proposed uses / allocation (as a proportion of floorspace)', it is stated that: <i>"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."</i> Our objection relates to this provision which, in terms of the tests as at para 135 of the 2019 NPPF, is not justified and not consistent with national policy.</p> <p>(a) 'Not Justified' The requirement for 75% of the site by floorspace to continue in use as a hospital is not based on any evidence. Indeed, even as site owner NHS PS itself cannot say precisely how much floorspace will be needed in the future. This is because commissioning and service location decisions are wholly beyond its remit; these are made by CCGs and, in the future, will be decided by Integrated Care Boards. However, NHS PS is certain that all of the current floorspace is not needed, not least because there is a significant amount of unused or inefficiently-used floorspace on the site. Furthermore, evolving models of care are likely to affect the amount of floorspace that is needed across the whole healthcare estate and in this regard the Government has recently noted that one of its key objectives is <i>"moving services out of hospitals and into the community, focusing on preventative healthcare."</i>¹ Such change can be rapid as demonstrated by the significant shift to online / telephone outpatient consultations as a consequence of the Covid-19 pandemic. Changes such as these can have wide-ranging benefits and therefore should be fully supported by the planning system. Benefits include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> time savings for patients and staff – enabling everyone to be more productive; <input type="checkbox"/> improved infection control – a significant consideration in improving patient outcomes;

Representor	Section	Summary of Comments
		<p><input type="checkbox"/> reducing the need to travel (and thus improving congestion and air quality);</p> <p><input type="checkbox"/> a more efficient use of space, thus reducing the costs of operating facilities and enabling land to be used for other purposes.</p> <p>NHS PS's aspiration is to consolidate existing services into the under-occupied main hospital – which is one of the most modern and best-quality buildings on the site – or in to other improved buildings, and then to release remaining areas for redevelopment. If NHS PS was required to retain an arbitrary proportion of the existing floorspace on the site this would result in avoidable costs (maintenance, security, power and so on) which would have to be met out of the public purse.</p> <p>(b) 'Not Consistent with National Policy' National planning policy (NPPF para 117) is clear that: <i>“Planning policies and decisions 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”.</i> (our emphasis) If an arbitrary restriction is placed on the redevelopment of the site, it cannot be said that the opportunity is being taken to make as much use as possible of this previously-developed land. Thus, the site allocation as currently drafted would not be consistent with national policy.</p> <p>4. Requested Changes To address the above issues, we respectfully request that the following change be made to the draft site allocation: Delete the following: 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. Replace with: Proposed uses / allocation: Residential use on surplus land subject to evidence being provided that either: (a) any service(s) that would be displaced have already been or will be relocated elsewhere on the site; or (b) service commissioners and / or providers have confirmed that service(s) no longer need to be provided from the site. At this stage it is not possible to accurately estimate the potential dwelling yield of the site. However we note that the land between the south-western side of the main hospital building and Burnt Oak Broadway is subject of an application for 129 dwellings (21/0274/OUT) and based on that site's capacity, we consider that the capacity of any surplus land to the east / north-east of the main hospital building could be significantly in excess of the 336-dwelling indicative capacity set out in the Regulation 19 draft local plan (we estimate the capacity to be in the region of 450 to 500 dwellings). We request that this indicative capacity be reflected in the site allocation.</p> <p>There are other minor changes that we request be made to the proposed site allocation:</p> <p><input type="checkbox"/> update the site's area – the area shown on Figure 1 is 4.15 ha;</p> <p><input type="checkbox"/> replace the red line boundary plan with Figure 1;</p> <p><input type="checkbox"/> correct the spelling of 'Burnt Oak' in 'Site Description';</p> <p><input type="checkbox"/> correct the spelling of 'metre' in 'Site requirements and development guidelines';</p> <p><input type="checkbox"/> delete the following <i>“Any tall building should be located away from Silk Stream main river”</i> on the basis that if any tall buildings are proposed, regard should be paid to the Building Heights SPD. Thus it is not justified to add additional restrictions at this stage;</p> <p><input type="checkbox"/> correct the 'Site Description' to reflect actual building heights: An NHS hospital on a relatively low density site, with buildings of 1-2 storeys An NHS hospital on a relatively low-density site, with buildings of 1-5 storeys To the north and south are 3-4 storey residential blocks To the north and south are 3-6 storey residential blocks</p> <p><input type="checkbox"/> amend the requirement for a 10 metre buffer along the Silk Stream to reflect the Environment Agency's requirement for an 8 metre buffer alongside a Main River so as not to unnecessarily constrain flexibility in delivering development in proximity to the Main River.</p>
Environment Agency	Site 5	<p>We are obliged to find the inclusion of the site unsound until we see evidence that the Sequential Test has been applied. Please see our representation to GSS01 for further information. We concur with the L2 SFRA findings that there is scope to incorporate mitigation measures which should aim to achieve a reduction in flood risk. We support the following text within the site requirements and development guidelines, as follows: <i>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.</i> However, the risks are significant given the fact the confluence of two rivers (Deans Brook and Silk Stream) converge at the northern part of the site, then flowing to the Silk Stream. Any proposal would need to control the fluvial flood risk from two rivers with no current defences, in addition to the other sources of flood risk from surface water, etc. The proposed uses/allocation as proportion of floorspace is stated as 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</p>

Representor	Section	Summary of Comments
		<p>residential. The indicative residential capacity is 366 for this site. Although this is a relatively large site as 2.87 hectares it's clear from the description of proposed uses that the majority of the site will be preserved as a hospital use and this use is already occupying the proportion of the site at lowest fluvial flood risk (Flood Zone 1). Therefore, the residential element will likely to be located in the area of highest risk (flood zone 2 and 3). There are likely to be some potential challenges in achieving a sustainable balance between the set back from Silk Stream and Flood Zone 3b, sequential approach on-site, flood risk mitigation and the number of housing units required. There might need to be some flexibility in terms of what this site can reasonably achieve in housing units, but it's not easy to tell at this stage. This site is likely to form part of potential strategic solutions we are currently identifying to protect the site and wider locale from flood risk from the Silk Stream. The flood management options being looked at on this stretch of the Silk Stream form part of the Silk Stream Flood Alleviation Scheme. We would definitely want to engage with developers to see how these flood management options could be incorporated into development proposals. Please see our recommendations below for modifications to the 'Site requirements and development guidelines text. a) The Sequential Test should be applied. See our representation to GSS01 for further detail. b) We recommend the following modifications to text based on new information we weren't aware of at regulation 18 stage and to strengthen/clarify the requirements: <i>Proposals should refer to the SFRA Level 2 for flood risk avoidance and mitigation measures. The sequential approach should be applied on site to direct more vulnerable uses to the areas of lowest risk including climate change within the site based on a Flood Risk Assessment. 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. Early engagement with the Environment Agency is advised to discuss potential flood management solutions being considered as part of the Silk Stream Flood Alleviation Scheme.</i> We will continue to support the Borough to resolve our concerns. If necessary, we are available to attend the examination hearings.</p>
Roger Chapman Ramblers Herts & North Middlesex	Site 5	<p>This site lies on the Strategic Walking network and a footpath runs along the back of the hospital grounds alongside the railway line. Development proposals should take the opportunity to ensure effective connectivity to this network and improve the environment of this footpath and open up its access to the Silk Stream.</p> <p>If the Strategic Walking Network is not adopted: A footpath runs along the back of the hospital grounds alongside the railway line. Development proposals should take the opportunity to ensure effective connectivity on foot and improve the environment of this footpath and open up its access to the Silk Stream.</p>
Thames Water Utilities Ltd	Site 50	<p>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.</p>
Thames Water Utilities Ltd	Site 50	<p>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</p>
TFL (Commercial Development)	Site 50	<p>TfL CD appreciates the amendments made in response to our Reg 18 representations. We understand that our colleagues in Operational Property are also looking at an option to use this site for transport operations, which should be referred to in the site allocation to provide flexibility for housing or transport operations or a combination of both.</p>
Roger Chapman Ramblers Herts & North Middlesex	Site 50	<p>This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network</p> <p>If the Strategic Walking Network is not adopted: Development proposals should take the opportunity to improve local connectivity on foot.</p>
Thames Water Utilities Ltd	Site 51	<p>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</p>

Representor	Section	Summary of Comments
Thames Water Utilities Ltd	Site 52	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
Theresa Villiers MP	Site 52	Kingmaker House - Opposed because of the overdevelopment this would involve. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals
Thames Water Utilities Ltd	Site 53	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
TfL (Commercial Development)	Site 53	TfL owns a substantial part of the allocated development site, including the station car park, bus standing and depot to the north. Need for additional operational facilities As set out previously, London Underground (LU) is assessing the need for additional train stabling across the Northern Line network to facilitate upgrade works. At the present time, LU is investigating requirements and locations and therefore the exact extent of the additional operational facilities required on the site have not yet been determined. As such, safeguarding is necessary as per London Plan Policy T3 which states that: <i>“Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London’s needs, including by “2) identifying and safeguarding new sites / space and route alignments, as well as supporting infrastructure, to provide necessary strategic and local connectivity and capacity by public transport, walking and cycling, as well as to allow for sustainable deliveries and servicing.”</i> The draft allocation therefore needs to be worded to allow flexibility with regard to the need for future additional operational facilities and also allow for the event that additional development could be accommodated should LU conclude that the site is not needed. In the latter case, a greater capacity of residential accommodation could be provided. This approach is necessary in order to make the site allocation positively prepared and justified, and the Local Plan sound. Need for a comprehensive development approach Although the site is in three separate ownerships, a comprehensive development across the land ownership boundaries would be the most efficient way to develop the land for the optimum amount and mix of uses. It would be helpful for the allocation to refer to this requirement. Taking the above two points into consideration, it is suggested that the wording for the site requirements and development guidelines is updated along the following lines: <i>A portion of the site should be safeguarded for TfL / London Underground for operational purposes, to serve a future Northern Line upgrade, with the extent to be established by London Underground following feasibility studies. Should TfL conclude that this site is not required for transport infrastructure then additional residential development would be appropriate. Station functions must be maintained. Landowners should work with TfL and the Council to identify a comprehensive scheme. 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 although there is some capacity for taller buildings particularly along High Road. Homes near to the Northern Line must be provided with noise mitigation, with trains running through the night on Friday and Saturday.</i> Percentage of land uses The use of percentage figures is an overly simple approach which may constrain the delivery of new housing and development. Further, the extent of LU operational facilities that may be required on the site has not yet been established. Therefore, the figure of 46% for TfL rail infrastructure, commercial, community and car parking could mean a different quantum of development dependant upon the extent of LU operational facilities required. As suggested in our previous Reg 18 representations, in the site allocations which deal with more complex and strategic sites the reference to % should be removed and it is suggested that the wording is updated along the following lines: <i>Proposed uses/ allocation(as a proportion of floorspace): 46% for TfL rail infrastructure and / or residential-led with commercial (office and light industry), community and car parking and 54% residential floorspace reflecting the site’s highly accessible location and encouraging the use of public transport and active modes of travel.</i> Site capacity figures Considering that the extent of requirements for LU operational facilities has not been established, the site could accommodate additional residential development should LU determine that the site is not required for additional infrastructure. We therefore suggest that the indicative residential capacities are given as minimum figures: <i>Indicative minimum residential capacity: 600</i>
TfL (Spatial Planning)	Site 53	We welcome the safeguarding of a portion of the site for new London Underground infrastructure which would be needed for a potential future upgrade of Northern line services and the requirement for station functions to be maintained.
Roger Chapman	Site 53	This site lies near to the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network

Representor	Section	Summary of Comments
Ramblers Herts & North Middlesex		
Baxendale Residents Association	Site 54	<p>I am writing on behalf of our clients, the Baxendale Residents Association to make representations in relation to site allocation no. 54 – Barnet House. Whilst we do not object to the redevelopment of the site, we consider that this prominent site (which sits at the edge of the town centre and in close proximity to suburban residential properties) should be developed in accordance with a more detailed site allocation in the emerging development plan, in order to set the broad parameters for development and secure a high quality and contextually appropriate redevelopment. The recently published NPPF (2021) (the Framework) confirms that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (para 126). Good design is a key aspect of sustainable development and clarity in design expectation is essential for achieving this. The Framework confirms that plans should set out a clear design vision and expectation, with policies developed in accordance with local communities, so that they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics (para 127). Our clients support the allocation of the site as a 'Development Proposals Site' and note the indicative number of units (139) and proposed mix of uses (predominantly residential with community and office uses). However, we suggest that the development potential of this site would be better fulfilled through a more detailed site allocation which sets out the broad parameters for development to include the following; <input type="checkbox"/> The maximum number of dwellings (139 as stated in both the Regulation 18 and 19 Site Allocation) to ensure that the density of development is consistent with the character of the area and is contextually appropriate; <input type="checkbox"/> Indicative floorspace quanta by indivual use i.e. community, employment and other commercial, with reference to the Council's most up to date employment land review and other relevant studies to ensure that sufficient employment floorspace is retained to meet identified local need; <input type="checkbox"/> To secure the demolition of the tower. A site allocation which confirms these parameters for development would set out a clear vision and expectation for the site, thereby achieving a high quality design that better reflects local aspirations and the areas defining characteristics in accordance with the revised Framework (2021). The Context The Barnet House site is immediately in front of the Baxendale Care Home, which sits at a lower level than Barnet House and faces the rear wall to the underground car park and the existing surface level car park. The redevelopment of this site represents an opportunity to improve this relationship through a high-quality design which has due regard to the scale, massing and character of the home and other neighbouring properties. Paulston House is also poorly related to the existing buildings on site, being very close to the northern boundary of the site. The existing inter-relationships give rise to potential for amenity issues (overlooking/daylight/sunlight) resulting from any redevelopment. As above, the site allocation in the emerging plan should confirm the need for a high-quality development, which responds to local context in scale, form and density. The site is immediately adjacent to and has sole vehicular access from Baxendale Road, which is a low-density, low-rise housing estate with a coherent and consistent design (three storey individual dwelling houses). The immediately adjacent site, to the south of Baxendale Road fronting the High Road, has recently been redeveloped with a mixture of apartments and town houses. These range from 2 – 7 storeys in height and have been designed to relate to the surrounding properties with descending heights to the rear of the site where they are in proximity to existing properties on Baxendale Road. The density of any new development at Barnet House should be consistent with the prevailing density of the area. This is an outer London borough which is generally suburban in character and the development density for this site should reflect this. The indicative density should be specified in the site allocation to confirm this. Mix of uses - The existing building is in office use (11,000 sq.m. floorspace), although it has been vacant for a short period (since March this year). The potential loss of office floorspace as a result of any redevelopment is significant and the site allocation should be used to secure a mix of uses to ensure that the appropriate quantum of replacement employment floorspace is achieved (to meet identified local market needs). The recent planning history confirms that the uncontrolled loss of office floorspace to residential use through permitted development has been particularly pronounced in Whetstone, with the result that an Article 4 Direction was issued to prevent further uncontrolled loss through permitted development conversions. However, this does not rule out loss through redevelopment requiring planning permission and the site allocation should guard against this by requiring mixed use redevelopment in its emerging policies. Site Allocation no. 54 should clearly set out the requirement for a mixed use redevelopment and provide an indicative quantum for replacement employment floorspace. There is an acknowledged increase in town centre housing within Whetstone and the immediately surrounding area, with a large number of residential redevelopments (recently completed, under construction and in pipeline) in close proximity. The emerging plan site allocation should include a requirement for appropriate community uses (as part of the overall mix of uses) to ensure that local infrastructure can accommodate the cumulative impacts of any redevelopment. The Existing Tower Barnet House is an existing 12 storey tower which sits in a very prominent position at the junction of one of the main access points to the town centre. Although it was designed by Robert Seifert & Partners, it is not considered to be of any particular architectural significance and is hugely discordant in scale, height and massing to buildings within its immediate context. The site allocation should encourage the removal of the incongruous tower to enable a contextually appropriate form of mixed use redevelopment. In conclusion, whilst we support the site allocation, we suggest that the wording is amended to enable a plan led, high-quality redevelopment at this prominent town centre site. The wording of the site allocation</p>

Representor	Section	Summary of Comments
		should be expanded to set the broad parameters for development (in physical form and use) and secure the removal of the existing tower. We trust that you will give these representations due weight and look forward to continuing to promote them through the plan making process.
Thames Water Utilities Ltd	Site 54	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
Baxendale Care Home	Site 54	<p>I am writing on behalf of our clients, the Baxendale Care Home to make representations in relation to site allocation no. 54 – Barnet House. Whilst we do not object to the redevelopment of the site, we consider that this prominent site (which sits at the edge of the town centre and in close proximity to suburban residential properties) should be developed in accordance with a more detailed site allocation in the emerging development plan, in order to set the broad parameters for development and secure a high quality and contextually appropriate redevelopment. The recently published NPPF (2021) (the Framework) confirms that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (para 126). Good design is a key aspect of sustainable development and clarity in design expectation is essential for achieving this. The Framework confirms that plans should set out a clear design vision and expectation, with policies developed in accordance with local communities, so that they reflect local aspirations and are grounded in an understanding and evaluation of each area’s defining characteristics (para 127). Our clients support the allocation of the site as a ‘Development Proposals Site’ and note the indicative number of units (139) and proposed mix of uses (predominantly residential with community and office uses). However, we suggest that the development potential of this site would be better fulfilled through a more detailed site allocation which sets out the broad parameters for development to include the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The maximum number of dwellings (139 as stated in both the Regulation 18 and 19 Site Allocation) to ensure that the density of development is consistent with the character of the area and is contextually appropriate; <input type="checkbox"/> Indicative floorspace quanta by individual use i.e. community, employment and other commercial, with reference to the Council’s most up to date employment land review and other relevant studies to ensure that sufficient employment floorspace is retained to meet identified local need; <input type="checkbox"/> To secure the demolition of the tower. A site allocation which confirms these parameters for development would set out a clear vision and expectation for the site, thereby achieving a high quality design that better reflects local aspirations and the areas defining characteristics in accordance with the revised Framework (2021). <p>The Context The Barnet House site is immediately in front of the Baxendale Care Home, which sits at a lower level than Barnet House and faces the rear wall to the underground car park and the existing surface level car park. The redevelopment of this site represents an opportunity to improve this relationship through a high-quality design which has due regard to the scale, massing and character of the home and other neighbouring properties. Paulston House is also poorly related to the existing buildings on site, being very close to the northern boundary of the site. The existing inter-relationships give rise to potential for amenity issues (overlooking/daylight/sunlight) resulting from any redevelopment. As above, the site allocation in the emerging plan should confirm the need for a high-quality development, which responds to local context in scale, form and density. The site is immediately adjacent to and has sole vehicular access from Baxendale Road, which is a low-density, low-rise housing estate with a coherent and consistent design (three storey individual dwelling houses). The immediately adjacent site, to the south of Baxendale Road fronting the High Road, has recently been redeveloped with a mixture of apartments and town houses. These range from 2 – 7 storeys in height and have been designed to relate to the surrounding properties with descending heights to the rear of the site where they are in proximity to existing properties on Baxendale Road. The density of any new development at Barnet House should be consistent with the prevailing density of the area. This is an outer London borough which is generally suburban in character and the development density for this site should reflect this. The indicative density should be specified in the site allocation to confirm this. Mix of uses The existing building is in office use (11,000 sq.m. floorspace), although it has been vacant for a short period (since March this year). The potential loss of office floorspace as a result of any redevelopment is significant and the site allocation should be used to secure a mix of uses to ensure that the appropriate quantum of replacement employment floorspace is achieved (to meet identified local market needs). The recent planning history confirms that the uncontrolled loss of office floorspace to residential use through permitted development has been particularly pronounced in Whetstone, with the result that an Article 4 Direction was issued to prevent further uncontrolled loss through permitted development conversions. However, this does not rule out loss through redevelopment requiring planning permission and the site allocation should guard against this by requiring mixed use redevelopment in its emerging policies. Site Allocation no. 54 should clearly set out the requirement for a mixed use redevelopment and provide an indicative quantum for replacement employment floorspace. There is an acknowledged increase in town centre housing within Whetstone and the immediately surrounding area, with a large number of residential redevelopments (recently completed, under construction and in pipeline) in close proximity. The emerging plan site allocation should include a requirement for appropriate community uses (as part of the overall mix of uses) to ensure that local infrastructure can accommodate the cumulative impacts</p>

Representor	Section	Summary of Comments
		of any redevelopment. The Existing Tower Barnet House is an existing 12 storey tower which sits in a very prominent position at the junction of one of the main access points to the town centre. Although it was designed by Robert Seifert & Partners, it is not considered to be of any particular architectural significance and is hugely discordant in scale, height and massing to buildings within its immediate context. The site allocation should encourage the removal of the incongruous tower to enable a contextually appropriate form of mixed use redevelopment. In conclusion, whilst we support the site allocation, we suggest that the wording is amended to enable a plan led, high-quality redevelopment at this prominent town centre site. The wording of the site allocation should be expanded to set the broad parameters for development (in physical form and use) and secure the removal of the existing tower. We trust that you will give these representations due weight and look forward to continuing to promote them through the plan making process.
TFL (Commercial Development)	Site 55	TfL CD appreciates the amendments made in response to our Reg 18 representations. For reasons as set out above, the reference to 20% re-provision of car parking is not 'sound' and should be deleted from the "Proposed uses" . We suggest it is amended: Residential with 20% limited re-provision of car parking <i>reflecting the site's highly accessible location and encouraging the use of public transport and active modes of travel.</i>
TFL (Spatial Planning)	Site 55	We support the continuation (and if necessary, extension) of local parking controls.
Theresa Villiers MP	Site 55	Woodside Park station - Opposed because of the overdevelopment this would involve. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals
Lodge Lane N12 Resident's Association	Site 56	Woodside Park Station West - is inappropriate and undeliverable. To accommodate 356 units on this thin strip of land in a suburban residential neighbourhood would require an excessive Very Tall building completely out of character with the surrounding area, overloading local amenities and overshadowing existing properties. In addition, work has started on part of the land to build 86 affordable flats ('pocket homes') under 19/4293/FUL, so it is unavailable for the massively more intense development required. Remove site 56 (and renumber accordingly), or replace with details of the approved development as per 19/4293/FUL. Adjust all related figures accordingly.
Andrew Cobbing	Site 56	Plans for the northern part of Site 56 Woodside Park Station West for 356 residential units are not legally compliant or sound because this construction would have a negative impact on the already limited light available to my property. Street plans indicate that the back gardens to the northwest of Woodside Park Station are quite long, which can easily prompt the erroneous assumption that new buildings on the Northern Line embankment would not have a significant impact on the light available to existing properties. Shadows cast as a result would cover only the rear of these gardens, and not the front areas closer to the buildings along Holden Road. This rationale does not apply in the case of 66 Holden Road, however, as there are four separate private gardens on this property as you can see from the attached plan , with the gardens of Flat 3 and Flat 4 situated towards the rear immediately adjoining the railway embankment. Flat 4's garden in particular already suffers from inadequate light (e.g. is totally invisible on Google Maps Satellite), since it is bounded to the south by, among other trees, nine immensely tall pines (marked blue on the attached plan), some of them protected, along the boundary with Meadowside Care Home. The construction of new residences on the embankment, therefore, would block out practically all the remaining light available and destroy Flat 4's garden as a viable space for leisure, recreation or any purpose usually associated with garden ownership. There is also a magnificent chestnut tree (marked red on the plan) at the back of Flat 4's garden, which is subject to a Tree Preservation Order . This tree provides not only the defining feature of the garden but is essential to the woodland character that gives the area its name, which Barnet Council is committed to preserve. New residences cannot be built under or immediately around the tree canopy, which extends over the boundary wall of Flat 4's garden. into Site 56. So as to be legally compliant and sound, besides deliverable and developable, the area on the railway embankment immediately behind 66 Holden Road needs to be removed from plans to develop Site 56. The issue of providing adequate access through Woodchester Court etc to Station Approach, the only conceivable exit route from the northwest portion of Site 56, also needs to be duly addressed in accordance with legal requirements for health and safety.
Joanna Neumann	Site 56	In order to be included within the schedule a site is required to be both deliverable and developable. Site No 56 is indicated to deliver a residential capacity of 356 units. I consider that this capacity has been based on a desktop calculation using the site area, PTAL and the density matrix rather than a physical evaluation of the site. The site to the north of Station Approach consists of a long narrow strip of land that forms a railway embankment with the levels rising steeply up from the rear garden boundaries of the properties in Holden Road to the rail line. In addition to which the land tapers significantly as it progresses northwards. Access would need to be achieved via an existing narrow driveway in close proximity to a number of existing dwellings. In order to deliver the proposed remaining 270 units (86 flats having consent to the south of Station approach) this would require cutting into the embankment which would potentially result in a significant safety risk to the rail line. Furthermore, due to the narrowness of the site and the need to include a means of access any new units would be in very close proximity to the rail line which would result in poor quality housing contrary to proposed policy CDH01 and due to the narrowness of the site there would be limited opportunities for amenity space (proposed policy CDH07). Access would be in close proximity to existing properties which would affect the living conditions of residents of these units. Finally, given the constraints of the site in order to deliver the number of units proposed buildings of a significant size and height would be required which would be out of character with the surrounding area. Whilst I accept, due to being

Representor	Section	Summary of Comments
		owned by TfL that the site would be available I do not consider that it would offer a suitable location for housing particularly at the volumes proposed and therefore it fails both the deliverable and developable tests. The northern part of the site needs to be reviewed and assessed as to whether the site could deliver the number of units proposed given the physical constraints of the site and to ensure that any housing delivered would be able to comply with the other proposed policies in the plan such as high-quality design. I accept that due to the current planning permission that the southern part of the site could deliver housing and should therefore remain in the Schedule of Site proposals. Preferably the site boundary should be redrawn to omit the land to the north of Station Approach or a proper site based assessment needs to be undertaken to assess how much of the area would be developable in a way that ensured the continued safety of the rail line, preserved the living conditions of existing residents and ensured that any development would not be out of character with the surrounding area and that potential future residents had appropriate living conditions and access to amenity space..
Thames Water Utilities Ltd	Site 56	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
Thames Water Utilities Ltd	Site 56	There are easements and/or wayleaves running through the site boundary.
TFL (Commercial Development)	Site 56	TfL CD appreciates the amendments made in response to our Reg 18 representations. For information, TfL is currently completing enabling works so that our partner Pocket Living can commence development of the planning permission for the redevelopment of the southern part of the site to provide 86 affordable self-contained flats within two x five storey blocks (application ref: 19/4293/FUL). Implementation of the planning permission is currently scheduled to begin in October 2021. The 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. At this stage, no feasibility studies have been carried out.
Roger Chapman Ramblers Herts & North Middlesex	Site 56	This site lies near to the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network If the Strategic Walking Network is not adopted: Development proposals should take the opportunity to improve connectivity of the local footpath network.
Theresa Villiers MP	Site 56	Woodside Park station Opposed because of the overdevelopment this would involve. I believe that the site set out above should be withdrawn from the Schedule of Site Proposals
Thames Water Utilities Ltd	Site 57	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
Thames Water Utilities Ltd	Site 58	On the information available to date we do not envisage concerns regarding wastewater treatment capacity 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
Thames Water Utilities Ltd	Site 59	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
Hari Dhanji	Site 6	<ol style="list-style-type: none"> 1. The neighbouring streets such as Barnfield Road have narrow pavements, what plans are being put in place to ensure the local roads are able to cope with the additional foot fall in the area. 2. The area is prone to high levels of water especially along the watercourse of the Silkstream River during periods of heavy rain fall. What will the council do to guarantee the new development being planned will not make the situation worse for residents in the area. The new development will cause an increase in Surface/Groundwater levels.

Representor	Section	Summary of Comments
		<p>3. For the occupiers of the new development where will they park? Whilst we appreciate that there are public transport links in the area, we should highlight that in most cases residents also require private vehicles. If parking considerations are not considered this would result in residents of the new development parking on neighbouring roads.</p> <p>4. The LLFA (Local Lead Flood Authority) is mentioned throughout the document. Currently it is apparent that no one within the council knows which department / team are responsible for this role. This has become apparent when residents have tried to make contact with the council with regards to LLFA concerns issues in regards to new developments.</p> <p>5. With the additional foot fall what plans are there to ensure that there is an increase in capacity for residents with regards to access to Schools, Doctors, Healthcare facilities in the area.</p>
Environment Agency	Site 6	<p>Despite the concerns we have raised at both the regulation 18 consultation stage and our response to the draft Level 2 SFRA, the site is included as a site allocation for residential floorspace. Our first major concern is that a large proportion of the site (38%) lies within the functional floodplain (Flood Zone 3b) and the vast majority of the remainder of the site lies within the 1 in 100 year (Flood Zone 3a) fluvial flood extent with 95% of the site covered during the 1 in 100 year plus climate change event. Therefore flood risk is a very significant constraint at this site and compared to the other site allocations there is very limited scope to apply the sequential approach, provide floodplain compensation or ensure a safe means of access and egress. Allocating the site for residential development would be contrary to the aims of para 155 of the NPPF and Table 3: Flood risk vulnerability and flood zone 'compatibility' of the Planning Practice Guidance. More vulnerable development and less vulnerable development uses should not be permitted or allocated in Flood Zone 3b and this would usually trigger a policy (inprinciple) objection from us should a planning application locate this type of use in this zone. The only permissible use classes in this zone are 'water compatible' or essential infrastructure (the latter if it passes the Sequential and Exceptions Test). The Sequential Test would need to be applied for More Vulnerable and Less Vulnerable uses in Flood Zone 3a, and as previously stated we see no evidence to justify the choice of this site in this regard. As we have not seen appropriate evidence of how the Sequential Test has been applied to the site selection process, our view is that the choice of this site is not sound as it is not justified i.e. an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The basis for appraising the site within the Integrated Impact Assessment (IIA) against the flood risk objective was 'flood zones' and 'CDA.' The Sequential Test and SFRA should have been the basis for appraising the site against that objective. We also raised concerns with the assessment conclusions within the Level 2 SFRA for this site, specifically that although standard mitigation measures have been proposed within the site assessment we are not confident or reassured that they would be sufficient to protect the site or not impact flood risk elsewhere. In the site description and development guidelines, we are surprised why Flood Zone 3b isn't even specifically mentioned when it has for Edgware Hospital with minimal Flood Zone 3b, as follows: <i>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 those parts of the site at the highest level of flood risk.</i> The justification for the site states: <i>The location is highly accessible and has potential for significant intensification. Development should avoid those parts of the site at highest flood risk.</i> Our concern is the whole site is at high risk and is in effect acting as potential flood storage within Burnt Oak Town Centre. It's also not advisable to look at Flood Zone 3b in isolation, almost the entire site lies within the 1 in 100 year flood extent (Flood Zone 3) and would flood to a maximum depth of between 3.1 to 4.3 metres with a maximum velocity of 1.6 metres per second. The Flood Hazard classification is Danger to All. Also the area of lowest risk to the east and north-eastern areas of the site are surrounded by the functional floodplain making access and egress particularly challenging. Although we have no specific records about historic flooding on site, we are fairly confident it would have flooded in 2015 and/or 2016 based on our knowledge of water levels elsewhere in the catchment during those years. The site also appears to be at high risk of surface water flooding. Overall, given the evidence and potential risks we do not think this is a suitable or sensible site for a residential/mixed use development. The inclusion of this site in our view would not be consistent with the aims of national planning policy and it's not justified as based on evidence we've seen to date (i.e. not an appropriate strategy taking account reasonable alternatives based on proportionate evidence). We advised at the regulation 18 stage that other sites at a lower risk of flooding with similar capacity that were discounted during the earlier Site Selection process should be reconsidered as part of the Sequential Test process. As advised in our representation to GSS01, we haven't yet seen actual evidence that the flood risk Sequential Test has been applied so there is the opportunity to consider all options now. Our strong recommendation is that the site is withdrawn.</p>
Thames Water Utilities Ltd	Site 6	<p>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</p>

Representor	Section	Summary of Comments
		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 .
TFL (Spatial Planning)	Site 6	We welcome the potential requirement for planning contributions towards station improvements, including step free access.
Roger Chapman Ramblers Herts & North Middlesex	Site 6	This site lies on the Strategic Walking network and a footpath runs along the back of the car park alongside the railway line. Development proposals should take the opportunity to ensure effective connectivity to this network and improve the environment of this footpath and open up its access to the Silk Stream. If the Strategic Walking Network is not adopted: A footpath runs along the back of the car park alongside the railway line. Development proposals should take the opportunity to ensure effective connectivity on foot and improve the environment of this footpath and open up its access to the Silk Stream.
Thames Water Utilities Ltd	Site 60	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
Thames Water Utilities Ltd	Site 61	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
Thames Water Utilities Ltd	Site 61	There are easements and/or wayleaves running through the site boundary. There is a critical trunk sewer running through this site.
TFL (Spatial Planning)	Site 61	Any development proposals that affect the continued operation of the bus station would need to be the subject of early discussion with TfL London Buses and consistent with London Plan Policy T3 on protecting and safeguarding operational transport land
Alan and Julie Jones	Site 62	The proposal indicates a potential for 170 residential units on the tesco site in ballards lane. If this is intended for the car park area, it implies a sizeable tower block. We maintain that the proposal is not consistent with delivering sustainable development. There would be a loss of biodiversity which is contrary to barnet policy to demonstrate a net gain from a project. A tall building would reduce the sunlight for about 4 hours a day. The houses in the grove (numbers 10 to 44) have significant gardens with trees and plants. they face south-west and south-east and abutt the car park. A loss of sunlight from the south around the middle of the day would reduce the carbon that the vegetation captures. Beneath the tesco carpark is an underground water course. When excavating in 1976, tesco discovered two artesian wells and had severe problems with water on the site. There is another well in the corner of no. 22, below their car park. The o.s. map 1894 shows two wells 500m apart with tesco car park in the middle (one is near lovers' walk and one near lichfield grove). The cellars of houses in the grove and grove avenue used to flood in winter with several inches of ground water. It would be extremely unwise to build any tall structure that is on unstable and water-prone ground. By means of this document, barnet council are now aware of this potential danger to occupants of a building. Any development of the tesco site should be limited in height to the existing structures. It would be necessary to determine whether there is a water course beneath the tesco car park.
Thames Water Utilities Ltd	Site 62	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
Alan Jones	Site 62	the proposal indicates a potential for 170 residential units on the tesco site in ballards lane. if this is intended for the car park area, it implies a sizeable tower block. we maintain that the proposal is not consistent with delivering sustainable development. there would be a loss of biodiversity which is contrary to barnet policy to demonstrate a net gain from a project. a tall building would reduce the sunlight for about 4 hours a day. the houses in the grove (numbers 10 to 44) have significant gardens with trees and plants. they face south-west and south-east and abutt the car park. a loss of sunlight from the south around the middle of the day would reduce the carbon that the vegetation captures. beneath the tesco carpark is an underground water course. when excavating in 1976, tesco discovered two artesian wells and had severe problems with water on the site. there is another well in the corner of no. 22, below their car park. the o.s. map 1894 shows two wells 500m apart with tesco car park in the middle (one is near lovers' walk and one near lichfield grove). the cellars of houses in the grove and grove avenue used to flood in winter with several inches of ground water. it would be extremely unwise to build any tall structure that is on unstable and water-prone ground. by means of this document, barnet council are now aware of this potential danger to occupants of a building. Any development of the tesco site should be limited in height to the existing structures.

Representor	Section	Summary of Comments
Sanjay Maraj	Site 62	<ul style="list-style-type: none"> • A tall building on this site contravenes several of the council strategy/policies described in the plan • There would be a direct loss of bio-diversity - Policy CDH08 states that development proposals should improve existing wildlife habitat and trees for amenity and biodiversity. • The perimeter of the Tesco car park provides a vital wildlife corridor • There would be a direct negative impact on the amenity of neighbouring occupiers. 6.10.1 – proposals that significantly harm the amenity of neighbouring occupiers “overshadowing, blocking, or reduced sunlight” will not be allowed • 6.18.10 – medium builds are more sustainable than tall buildings • The Hackitt enquiry, and imminent Building Safety bill, place greater emphasis on all aspects of building safety. The structural integrity of this site for a tall building development is of significant concern, due to the site being directly over a subterranean water course • If disturbed, the ground water has potential to cause adverse environmental impact on surrounding houses. Note, we are residents, and our basement has been dry since we moved in (16 years ago). • Multiple recent building developments in the immediate area have increased the population which compound the problem of waste water drainage capacity. And there is a planning proposal for another tall building directly opposite the Tesco store. • The site fails to meet the criteria as specified in 16.1.4. • Remove this as a potential development site for tall buildings
TFL (Spatial Planning)	Site 62	We recommend that car parking is removed from the proposed uses due to the well-connected town centre location and future PTAL of 5.
Thames Water Utilities Ltd	Site 63	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 .
Thames Water Utilities Ltd	Site 63	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 .
Thames Water Utilities Ltd	Site 64	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
Thames Water Utilities Ltd	Site 65	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
Thames Water Utilities Ltd	Site 66	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

Representor	Section	Summary of Comments
Thames Water Utilities Ltd	Site 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
TFL (Spatial Planning)	Site 67	We welcome that '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.'
Roger Chapman Ramblers Herts & North Middlesex	Site 67	This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network and to improve the existing footpath. If the Strategic Walking Network is not adopted: Development proposals should take the opportunity to improve the existing footpaths and to ensure effective connectivity on foot.
Thames Water Utilities Ltd	Site 7	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 .
Thames Water Utilities Ltd	Site 7	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
Historic England	Site 8	We note the new reference to nearby conservation areas. It would be helpful to include a requirement to take into account the relevant conservation area appraisals and any key views in the development guidelines (as has been included with Site 11).
Thames Water Utilities Ltd	Site 8	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 .
Thames Water Utilities Ltd	Site 8	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
Railway Terraces Residents Association	Site 8	IT IS NOT LEGALLY COMPLIANT - It is not compliant with local or national planning policy, in that it fails to protect the Cricklewood Railway Terraces Conservation Area. The statement that the conservation area 'lies to the northwest of the site' is economical with the truth. It is immediately adjacent to Site 8 – only yards apart. A development of this height and density would cause harm to the setting of the Cricklewood Railway Terraces Conservation Area and would not preserve or enhance the character and appearance of that Conservation Area contrary to Policy 7.8 of the London Plan (2016), Policy CS5 of the Barnet Local Plan Core Strategy DPD (September 2012), and Policy DM06 of the Barnet Local Plan Development Management Policies DPD (September 2012). Policy 7.8 of the London Plan requires new development to conserve the significance of heritage assets and their settings by being sympathetic to their form, scale, materials and architectural detail . This development is not only out of scale with the Railway Terraces but with the whole of Cricklewood. The architecture has nothing in common with the local built environment, either in scale or design. It is just a series of huge, uninteresting towers in tightly packed blocks. Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

Representor	Section	Summary of Comments
		<p>The proposed development does not follow Barnet's Tall Buildings Update 2019, which makes a distinction between 'Very Tall Buildings' (15 storeys and above) and 'Tall Buildings' (8 to 14 storeys). Cricklewood Town Centre is designated as an appropriate area for Tall Buildings. The huge buildings proposed for the B&Q development will dominate Cricklewood town centre and are so densely packed that they overshadow each other as well as the surrounding townscape. There are six 'Very Tall' towers (19 x 2, 18, 17, 16 and 15 storeys) in the B&Q scheme. The site has been classified as CENTRAL, probably in order to justify the extreme height and density, yet it is only yards from the 1-13 Cricklewood Lane (Coop site) which was classified as URBAN. Barnet approved the Coop site at 9 storeys, reduced from 15.</p> <p>IT IS NOT SOUND Housing should be distributed evenly across the borough. A range of housing types is needed across the Barnet, so that people have choice about where they live and work. But there should be more evenly balanced communities. The intensification of the B&Q site (against the wishes of local people) and the number of housing units being proposed for Cricklewood is because other Barnet wards do not want intensification in their areas and everything is being shoved to the edge of the Borough. West Hendon, Colindale, Burnt Oak (the A5 corridor that leads north out of London) include pockets of poverty, overcrowding and poor health (resulting in the highest Covid rates in Barnet). Cricklewood Town Centre is very different in character and should not be subjected to the level of housing intensification proposed for the B&Q site. Certainly, it is a suitable site for housing, but on a more modest scale. Cricklewood is a strong and cohesive community that crosses the boundaries of three boroughs (Barnet, Brent and Camden). Introducing more than 1,000 units in very high rise, closely-packed blocks, which will be completely alien to the area, will create a divided community. It will alienate the people who currently live here. There is already considerable pressure on public services and infrastructure in Cricklewood. The thousands of extra people in B&Q development will bring that to breaking point.</p> <p>IT IS NOT COMPLIANT WITH THE DUTY TO CO-OPERATE No real attempt has been made by Barnet to engage with local people and meaningfully consult them about what is proposed for the site. From time to time Cricklewood has been told what is proposed but neither LBB nor Montreaux has taken any notice whatsoever of local feedback. Local people should feel involved in the Local Plan and they certainly don't in relation to the B&Q site. An exhibition should have been mounted in the B & Q store which is the Site 8 location, and also in the local Coop and Tesco stores. The access road is unadopted and owned by a third party. There has been no meaningful discussion with the third party, which has now raised legal challenges. Housing development on the B&Q site should be compliant with Barnet policies on Tall Buildings and with the London Plan. What is proposed is not. The access road to the site is owned by a third party. Local people should be properly consulted. The Local Plan for the Cricklewood Growth Area should be drawn up in co-operation with Brent and Camden. The Railway Terraces were built nearly 150 years ago and are an important part of the Cricklewood community. The people who live in the Railway Terraces Conservation Area Residents Association want their voices and views to be heard.</p>
Environment Agency	Site 9	<p>We note the Level 2 SFRA has assessed this site and recommended how the site can be mitigated. However, the SFRA findings also highlight the sites vulnerability, for example, the predicted flood risk extent for the climate change scenario is greater, leaving most of the site's area by the southern/western boundary at risk of flooding and approximately 24.8% of the site would be expected to be inundated during this event. The site description in the Local Plan states '<i>Difficult access also makes the site vulnerable to flood risk.</i>' Access and egress is likely to be challenging to address safely. Our concerns remain that <u>this is not a sensible site</u> to propose housing given its vulnerable position, a thin strip of land less than a hectare between a railway embankment and floodplain of the Silk Stream main river, the difficulty with access, and the implications of climate change both now and in the longer-term. Although the functional floodplain only currently covers 7.2% of site according to SFRA, the site is effectively surrounded by the functional floodplain to the south. Although we can't predict with absolute certainty what the nature of flood risk will be in 50 years or 100 years' time, it is likely that the sites vulnerability over time is going to increase not decrease. It would be difficult to compensate for the flood storage taken up by a development and therefore possible flood risk would be increased elsewhere to nearby properties. We would urge the Borough to consider the broader implications of the sites geography and location and longterm vulnerability. We believe the inclusion of this site to provide an indicative 128 residential units (even though informed by a Level 2 SFRA) is unsound as it's not justified i.e. an appropriate strategy taking into account reasonable alternatives (lack of Sequential Test evidence, a review of alternatives) and its position and location makes it very vulnerable to flood risk and climate change. It's inclusion as an allocation in our view goes against the principles outlined in para 149 of the NPPF in that it doesn't appear to a pro-active approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk. Para 150 goes onto state that: <i>New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure;</i> Our view is that this would be a very difficult site to mitigate given its geography and difficult to access by emergency services if a flood event occurred. In addition, as a greenfield site with extensive tree coverage, it's probably already serving quite a useful and protective function in providing an additional buffer to the Silk Stream floodplain, providing water attenuation and green infrastructure. This is likely to be of benefit to the existing area which is already vulnerable, e.g. as stated in our regulation 18 comments, flooding from the Silk Stream occurred in this area in summer 2016 with roads, gardens and properties flooded as a result.</p>

Representor	Section	Summary of Comments
		<p>Colindeep Lane also suffers regularly from surface water flooding. Also, para 156 makes an important point about SFRAs, cumulative impacts and the advice of risk management authorities in stating: <i>Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.</i> The Level 2 SFRA assessment of the site does include some useful information about the potential severity of risk, and although has recommended how the site can be mitigated to be made safe, should not be taken at face value. A level of interpretation needs to be applied to all the findings and we advise considerable caution should be applied in this case taking into account the sites vulnerable location, cumulative impacts and climate change We acknowledge the challenge in finding enough sites to meet housing needs. However, we advised at the regulation 18 stage that other sites at a lower risk of flooding with similar capacity that were discounted during the earlier Site Selection process should be reconsidered as part of the Sequential Test process. As advised in our representation to GSS01, we haven't yet seen actual evidence that the flood risk Sequential Test has been applied so there is the opportunity to consider alternative options now (whether this is alternative sites or redistribution of housing across other low risk sites with the potential to increase capacity). Unfortunately, our strong recommendation is that the site is withdrawn.</p>
Simon Wilkins	Site 9	<p>I believe the proposed development of Site No. 9 (Colindeep Lane adjacent to the Northern Line) is unsound for the following reasons; - The disruption to the existing woodland is disproportionate to the number of new homes proposed (128); - the current journey time between the northern end of Rushgrove Park & southern end of Colindale Park is approx. 10 minutes on foot. The proposed pedestrian & cycle route between the Northern Line & the Silkstream would have minimal impact on an already short journey; - access between Rushgrove Park & Colindale Avenue (at the northern end of Colindale Park) will already be improved by the proposed pedestrian & cycle route under the Northern Line linking Colindale Gardens to Colindeep Lane. This reduces any justification for the proposed pedestrian & cycle route between the Northern Line & the Silkstream. Additionally I believe the proposals to be non-compliant with the Duty to Co-operate because;- consultation closes while construction is ongoing on new residential blocks in close proximity to the proposed site (on the Colindale Gardens site on the opposite side of the Northern Line). Future members of the community, who will be most impacted by any construction work on the site, will not have an opportunity to submit representations. Site no. 9 should be removed as a potential site for development from the local plan for the reasons stated in my previous answer. A reasonable modification would be to;- grant permission for 128 additional homes on the adjacent Colindale Gardens site. This could be achieved either by increasing the height (and residential capacity) of buildings yet to begin construction at the south-eastern end of the site, or by utilizing parts of the land currently designated as Peel Square, orchard garden, or 4 acre park. <u>Would like to participate at the examination hearings:</u> I want to be sure that the existing benefits of linking Colindale Gardens to Colindeep Lane are being taken into account when considering Site 9 for future development. None of the maps used in the draft local plan show the new roads & footpaths that have / will be built on the adjacent Colindale Gardens site which already bring similar benefits to what is proposed.</p>
Thames Water Utilities Ltd	Site 9	<p>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.</p>
Thames Water Utilities Ltd	Site 9	<p>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.</p>
Rohit Kumar	Site 9	<p>This representation is in regards to Site 9 for the proposed construction of 128 homes in the draft local plan. Below are the points we want to raise in our representation on the draft local plan and request why the proposed site should be rejected for any construction: 1. It is extremely concerning that even when the draft plan recognises the site as a thickly wooded area with a water body (Silk Stream), it has still put the site under the potential housing construction space of (mere) 128 homes. This would mean cutting a lot of native and naturally grown trees in our vicinity, which is definitely not good for the climate and biodiversity and animals like fox that lives on the site. This is even more ironic that this site is owned by TFL, which is headed by Mayor of London who has</p>

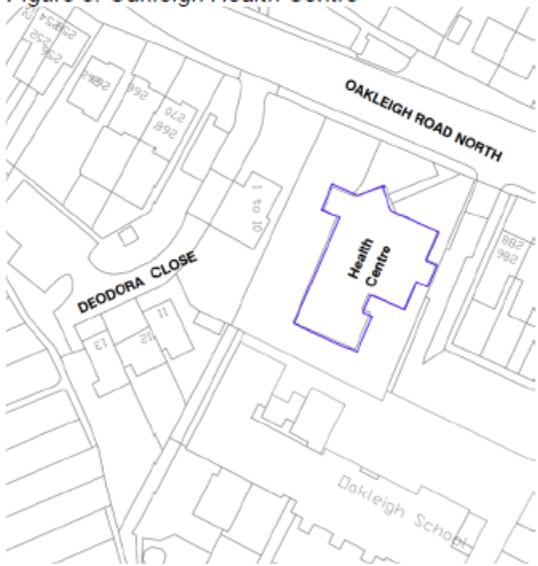
Representor	Section	Summary of Comments
		<p>been pushing for congestion charges and ULEZ to help stop climate change. This is clearly against the statement 'The Council is on a credible path to achieving net zero emissions and helping make London a zero-carbon city by 2050' as stated in para 6.13 in Draft Local Plan and the policies ECC01, ECC02, ECC06. This affects the biodiversity in the negative way and is against the vision statement in para 3.1 and 6.22.3 & 6.22.4 which states a requirement for delivering biodiversity net gain of at least 10% and the Council will seek to retain existing wildlife habitats such as trees, shrubs, ponds. This is not 'Justified' and 'Effective' as it is impossible to deliver in the current circumstances. 2. This also means the residents in Colindale Gardens open space have more tall buildings on the other side of the track instead of greenery space and more train noise would come in the children playground and houses after reflection from the new buildings and same would happen in the proposed built houses. This is not in line with the draft local plan para 6.10.3, 10.9 which aim to reduce noise pollution and vibration impact of the development site. This is against the policy ECC02 and GSS09 – "Avoids unacceptable levels of air and noise pollution for the new residents". This would not be 'Justified' and 'Effective' as it increases the noise for existing residents and for new resident who may occupy the homes if the proposal is to go ahead. 3. As per the council document, the area falls in flood zone 2 and zone 3 and is right next to Silk Stream. This is against the stated goal in para 2.6.1, in the Vision Statement para 3.1.1 and policy ECC02A which states that 'The Council will seek to ensure that development delivers a positive reduction in flood risk'. This would increase the flood risk not only for a new development on the site but also for houses in the vicinity of this site. This is also against the policy GSS01 which states that "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". It is concerning that even then the council has proposed this small site for house construction while an area of similar size has been left for children playground and an open space in the Colindale Garden, right on the opposite side of the proposed site. This explains that why this is not 'Justified' and 'Effective'. To summarise, we believe that this part of the draft local plan with respect to site 9 is not sound – not 'Justified' and 'Effective'. As described in the Answer 3, this site is highly unsuitable for any new housing development as it severely affects the people, environment and biodiversity in the area. Moreover, as the proposal only provides 128 new homes on this site, its severe impacts clearly outweigh the benefits for existing and new residents and the whole ecosystem and environment. As the Colindale Garden is already a site for close to 3000 new homes, this site can be easily rejected for other better alternative sites which brings positive changes for the Barnet community and not severely impacts it in a negative way. So, together we request that this site be rejected for any new construction and development for housing/buildings to avoid the negative impact on the whole ecosystem/community.</p>
Roger Chapman Ramblers Herts & North Middlesex	Site 9	<p>This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route. If the Strategic Walking Network is not adopted: Development proposals should take the opportunity to ensure effective connectivity on foot and open up its access to the Silk Stream with a walking and cycling route.</p>
Landsec	Site. 67	<p>Landsec continues to strongly support the allocation of the site for comprehensive or infill residential-led development. As a means of context, GNLP sits adjacent to the Finchley High Road (A1000), just north of the North Circular. The 3.45 ha out of centre leisure park is largely rectangular in shape and is made up of large 'box' leisure units of approximately two to five storeys in height and associated surface car parking. The site currently comprises an eight screen cinema and indoor bowling complex, with ancillary restaurants at ground floor; Finchley Lido Leisure Centre, comprising a gym with indoor and outdoor pools; four linked units, comprising four restaurants (one with drive through facilities); a small single storey building serving an onsite car wash; and 6surface car parking. Trees are present to the eastern boundary and a number of small street trees and hedges are dispersed throughout the car park. There are no statutorily or locally listed buildings on the site. Furthermore, the site levels have an approximate 5m fall in height across the site; from c. 76m AOD along the northern boundary to c. 71m AOD across the south. The site is bounded to the north by additional leisure facilities, which are accessed via a shared mini roundabout off Finchley High Road and Summers Lane to the north. To the north east and east of the site are public playing fields, accessed from Summers Lane to the north. An area of Metropolitan Open Land (MOL) lies to the east of the site, and the Glebelands Wood Nature Reserve borders the site to the south. The site lies approximately 750m south of North Finchley Town Centre, which provides many local amenities. Opportunities for development - The wider leisure industry is facing unprecedented challenges, particularly with respect to cinema, restaurant, indoor leisure uses and retail parks, and the competition offered by other locations (such as town centres) and online retailers. In this context there is considerable scope for a fundamental re-evaluation of what GNLP can offer and a greater opportunity for more comprehensive redevelopment than envisaged by the current draft allocation. Initial masterplan and feasibility studies were undertaken by Landsec in 2020 to ascertain the level of development potential on the site, taking into account the opportunity for comprehensive redevelopment. A high-level meeting was held with senior planning and planning policy officers from LB Barnet on 20th May 2020 following the submitted representations on the Regulation 18 Draft of the LB Barnet Local Plan. At this meeting four architectural concepts for residential-led redevelopment of the site were presented and discussed, all of which demonstrated the potential to deliver circa 800 homes with a mix of other uses through the comprehensive redevelopment of the site. Landsec considers the concept which offers the widest range of benefits to the local area to be the Vale of</p>

Representor	Section	Summary of Comments
		<p>Health, which is a specific approach to placemaking orientated around creating a health and wellbeing neighbourhood. This provides opportunity to develop a comprehensive residential-led mixed-use development which will fulfil the vision of the emerging Local Plan and bring forward much needed housing delivery. Landsec considers this development typology also offers opportunity to explore an appropriate and sustainable mix and quantum of non-residential uses and enables the reprovision of the lido. There are three overarching principles that feed into the Vale of Heath typology, which we consider closely align with the overarching aspirations of the Draft Local Plan:</p> <ul style="list-style-type: none"> • Connect the neighbourhood physically via access points and pathways, and visually to the surrounding area, and maximise the potential of orientation, aspect and views. • Create an attractive place people will want to dwell and visit, through use of pedestrian friendly streets and public spaces (minimising vehicular movement), landscaping approaches, and active frontage animation. • Use efficient building forms that successfully integrate residential uses with other uses and optimise residential quality. <p>Please find enclosed an illustrative masterplan and indicative scheme massing in relation to the Vale of Health concept. This illustrates the opportunity to provide high quality public and communal spaces with buildings set within these areas and sensitively responding to the MOL.</p> <p>Proposed Uses - The draft allocation includes an indicative residential capacity of 352 units. This is not based on any feasibility studies and must only reflect the option of infill development and not comprehensive redevelopment. Whilst a partial infill scheme is possible at the site, there is an opportunity to create a more holistic and well considered scheme by revisiting the entire site which will also allow optimisation and best use of land, in accordance with London Plan H1 and SD7, and Draft Local Plan GSS12. As such there is a clear rationale to increase the indicative capacity from 352 units to circa 800 units through comprehensive redevelopment and it is requested that the site allocation be revised upwards to reflect the likely capacity, as evidenced by the initial masterplan and feasibility studies were undertaken by Landsec in 2020. This will ensure the allocation is sufficiently flexible to address both the infill and redevelopment options, and is considered a sound approach. The allocation currently prescribes 60% residential floorspace with 40% commercial, leisure and community use floorspace. Landsec consider this approach of prescribing an explicit numerical split for land uses, without any supporting site-specific architectural feasibility work or analysis of the market demand, to be an overly restrictive and unsound approach. The allocation should acknowledge that the quantum of development including the split between different uses will be shaped by demand and by the nature and quantum of uses present within the wider area including North Finchley Town Centre, which can fluctuate over the life of a 15-year Local Plan. In particular we are aware of proposals for regeneration of North Finchley town centre, and want to ensure that GNLP provides a complementary leisure offer, rather than competition. The overall quantum of floorspace and the split between uses should be derived through an approach which is design-led and takes full account of market need and demand for this out of centre site, acknowledging that there is no planning policy protection on the loss of the existing retail and leisure uses, to ensure the proposed redevelopment creates a successful sustainable mixed-use place that makes the best use of land, as required by London Plan Policy GG2. On this basis, we request that the policy is altered to read: <u>“Proposed uses/ allocation: residential led scheme with commercial, leisure and community uses, with the quantum of floorspace to be determined through a design-led approach with regard given to need and demand”</u></p> <p>This approach will ensure that a scheme can come forward with an appropriate mix and quantum of uses, which can also be shaped in discussion with Officers and key stakeholders at pre-application stage. This approach also ensures the allocation retains sufficient flexibility to respond to any change in the market and/or in the specific needs of the immediate area and the wider Borough. Site Requirements and Development Guidelines - Landsec continues to strongly support the statement that ‘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’. Landsec supports the proposed guideline that proposals must reflect the context of a Major Thoroughfare and respond to the adjacent MOL. The Vale of Health development typology offers opportunity to introduce ecological and biodiverse landscapes, areas of public realm, high quality-built form with a range of uses and connection to the neighbouring MOL. Landsec supports the acknowledgment in the draft allocation that proposals should include measures that contribute towards modal shift away from private car use to more sustainable means of transport. The site currently includes a large amount of car parking for the leisure facilities on the site. The Vale of Health development typology offers opportunity to significantly reduce vehicle trips associated with existing use and therefore benefit the wider existing road network, whilst also supporting future occupants to utilise public transport, walking and cycling, in accordance with Draft Policy GSS11.</p>
TfL (Commercial Development)	Sites 27 & 28	TfL owns a small amount of land within Site No 27 and all of the land within Site No.28. TfL CD has been working with Ballymore, the owner of the Broadwalk Shopping Centre, whose landholdings comprise the majority of Site No.27, to look at a comprehensive development across both sites. We have undertaken an initial feasibility study covering both sites to inform this. As previously stated, TfL CD welcomes allocation of these highly accessible, brownfield, town centre sites for housing-led, mixed-use development. As set out in our representations to the Reg 18 consultation, given these two sites comprise a majority of the area within the Town Centre and their redevelopment would have a huge positive impact on the function and nature of the Town

Representor	Section	Summary of Comments
		<p>Centre, it is considered that they should be incorporated into one site allocation. This would reflect the need for a comprehensive approach to development on both of these adjacent sites including the best disposition of transport infrastructure and improved interchange, new homes, retail, and other commercial and community facilities. Given that both landowners are working in partnership, a separation upon ownership lines is therefore arbitrary.</p> <p>Site capacity figures As set out in our representations to the Reg 18 consultation, we are surprised that the methodology for calculating site capacity figures is based on the 2016 London Plan Density Matrix. Given the 2021 London Plan replaces the density matrix with a design-led approach, the methodology used in your Reg 19 consultation is no longer appropriate. We therefore suggest that the indicative residential capacities are given as minimum figures: <i>Site 27: Indicative minimum residential capacity: 2,379</i> <i>Site 28: Indicative minimum residential capacity: 2,317</i></p> <p>Uses as a percentage of floorspace As set out in our representations to the Reg 18 consultation (and in connection with other draft allocations above), no detail has been provided as to how the percentages have been calculated; the only reference to the use of a % for non-residential uses is in para 6.3.3 of this Site Selection Background Report and this only refers to an assessment having been carried out but does not provide any details of this assessment. The use of percentage figures for such large sites that are required to deliver over 4,500 homes is an overly simple approach which may constrain the optimisation and delivery of new housing and development. Further, requiring Site 27 to deliver 25% non-residential uses and Site 28 to deliver 30% non-residential uses would be difficult to monitor and assess considering that a comprehensive development which optimises uses across both sites will come forward. Again, as set out in our previous representations, it is suggested that, for more complex and strategic sites of this nature, these site allocations remove reference to the % and wording is updated along the following lines: <i>“Proposed use type/s: residential with 30% mixed uses (transport, retail/, office and community)transport and town centre uses to strengthen the high street including retail; food and beverage; leisure; office; community and public realm / open space.”</i></p>
John Doherty	Sites 34 to 42	<p>I write to express the strongest reservations about the Draft Local Plan. The Local Plan appears biased, unlawful and a wholly improper attempt to create a University campus in Hendon (an historic residential suburb), for literally thousands of students, whom it seems find travelling short distances on public transport too challenging / inconvenient. The Local Plan is focused on students and highly prejudicial to the Environment and the interests of local residents and others in the Borough of Barnet. Perfectly good two-storey buildings - some constructed in the last c.20years (Fenella House) are proposed for demolition and rebuilding to 7 storeys tall!! HAS ANY RATIONAL PLANNING PROFESSIONAL THOUGHT OF THE UNNECESSARY ENVIRONMENTAL IMPACT OF THIS MADNESS? The nature and scale of the development proposed is absurdly overblown and disproportionate and local residents' views are sought cynically, without any intention of heeding them in any significant or meaningful sense. Further, you should note the following: London Plan (March 2016) Policy: 2.6: Outer London: Vision and Strategy recognises that one of the key opportunities for Outer London is maintaining and enhancing the high quality of life that is already there. Delivery of “lifetime neighbourhoods” is an important part of preserving this quality of life. If Middlesex is allowed to dominate the area, Hendon residents will be excluded from every single civic building on The Burroughs. The overwhelming size and scale of developments will not only destroy the character of The Burroughs and Church End, but also put Heritage at risk. Plans do not follow advice given by Historic England, and could cause significant harm to heritage and conservation areas. The only potential development site to be completely removed from plans Middlesex University's own car park. Loss of parking for worshippers of local places of worship is discriminatory and would irreparably damage local businesses. Loss of parking for residents, their visitors and tradesmen would make residential properties on The Burroughs unliveable for families or those with additional needs and those who require a car for work and difficult for anyone. Barnet's own guidance documents (Local Plan SDP, Residential Design Guidance, Oct 2016) states that developments must ask the question 'Is there enough parking for residents and visitors?' (Appendix 1, Q10A). There is no up-to-date parking survey Additional parking pressure on residential roads leading off The Burroughs would negatively impact those residents. On street parking is hazardous for pedestrians and cyclists and causes accidents. Local school children could be put at risk during pick up and drop off. New homes on the car parks will block out light and cause safety and security issues for local residents. Housing on Burroughs Gardens car park would negatively affect local businesses situated to the rear and side of the car park. There is ample opportunity for Middlesex University to develop its campus within its own footprint.</p>
Rajesh Patel	Sites 34 to 42	<ul style="list-style-type: none"> • Provision suggested in Local Plan has singular agenda in creating University campus in a suburban residential setting. • This Local Plan would result in the introduction of 1712 students to be domiciled in the area. - 758 currently - 180 in newly council - approved private rooms- 774 in new blocks- This figures do not include numerous Private HMO's • This would result in dramatically alter the demographic of the area, so much as to be detrimental, replacing established residential neighbourhoods with transient ones. • If Middlesex University is allowed to dominate the area, Hendon residents will be excluded from every single civic building on The Burroughs. • The overwhelming size and scale of development will not only destroy the character of The Burroughs and Church End, but also put heritage at risk. • Plans do not follow advice given by Historic England and would cause significant harm to heritage and conservation areas. • The ONLY potential development site to be completely removed from plans Middlesex University's own car park. • Benefits for residents are still undefined. • Loss of parking for residents in Fuller Street , their visitors and tradesmen • Barnet's own guidance documents (Local Plan

Representor	Section	Summary of Comments
		<p>SDP, Residential Design Guidance, Oct 2016) states that developments must ask the question “Is there enough parking for residents and visitors?” (Appendix 1, Q10A). • There is no up- to-date parking survey. • There is no mention of parking provision for current or future residents. • Moving the PDSA on the Fuller Street car park will creat additional parking pressure on Fuller Street would negatively impact residents - Local school children would be put risk during pick up and drop off - PDSA on car park will block out light and cause safety and security issues for local residents and will put a strain on the infrastructure. - Overlooking/Loss of privacy - Noise and disturbance resulting from use - Safety from various animals • More than 17 privately owned buildings will be compulsorily purchased, and tenants forcibly moved out of their homes. • There is ample opportunity for Middlesex University to develop its campus within its own footprint • London Plan (March 2016) Policy: 2.6: Outer London: Vision and Strategy recognises that one of key opportunities for Outer London is maintaining and enhancing the high quality of life that is already there. Delivery of “lifetime neighbourhoods” is an important payoff preserving this quality of life</p>
Kathleen Richardson	Sites 34 to 42	<p>Provision suggested in the Local Plan has the singular aim of creating a University campus in a suburban, residential setting. The nature of London Universities is that they are largely commuter based with spread out campuses. There are no examples of campus universities in London. This local plan would result in the introduction of 1712 students to be domiciled in the area: 758 currently, 180 in newly council-approved private rooms, 774 in new blocks. This figure does not include private HMOs. The result of this would be to dramatically change the demographic of the area, so much as to be detrimental, replacing established residential neighbourhoods with transient ones. There will be, without a doubt, an increase in crime - already an issue pre-pandemic due to student drug use - and in littering. This directly contradicts the London Plan (March 2016) Policy: 2.6: Outer London, where the Vision and Strategy recognises that one of the key opportunities for Outer London is maintaining and enhancing the high quality of life that is already there. Delivery of “lifetime neighbourhoods” is an important part of preserving this quality of life. If Middlesex is allowed to dominate the area, Hendon residents will be excluded from every single civic building on The Burroughs, and more then 17 privately owned buildings will be compulsorily purchased, with tenants forcibly moved out their homes. The overwhelming size and scale of developments will not only destroy the character of The Burroughs and Church End, but also put heritage at risk. Plans do not follow advice given by Historic England, and could cause significant harm to heritage and conservation areas. The only potential development site to be completely removed from plans, after 4 rounds of extremely negative feedback, is Middlesex University’s own car park (!). The benefits for residents are still undefined, because there are none! Loss of parking for clients and customers would irrevocably damage local businesses. Loss of parking for residents, their visitors and tradesmen would make residential properties on The Burroughs unliveable for families or those with additional needs and those who require a car for work and difficult for anyone. This would adversely affect the local community and particularly put heritage houses at risk. Furthermore, Barnet’s own guidance documents (Local Plan SDP, Residential Design Guidance, Oct 2016) states that developments must ask the question ‘Is there enough parking for residents and visitors?’ (Appendix 1, Q10A). Please also note there is no up-to-date parking survey and there is no mention of parking provision for current or future residents. New homes on what are now car parks will block out light and cause safety and security issues for local residents. They will also put a strain on infrastructure, and the plans do not include guarantees re: the infrastructure. There is no historical proof. from other planning documents, of the council actually following through on delivering planned GP surgeries etc Lastly, I do not understand why there is no development undertaken on the existing Middlesex Uni campus. Low story buildings could get replaced with high story buildings, with student housing on top, and there is still open space on campus that is currently not used. Students really are OK commuting, so why would the land by Brent Cross not be off use? Why destroy families and business when you really don't need to, and there is no tangible, long term benefit?</p>
Sharon Rind	Sites 34-41	<p>With regard to feedback on this Local Plan, I am not a lawyer, architect or engineer, as I'm sure many Barnet residents are not, and therefore cannot comment on whether these plans are legally compliant, sound or compliant with duty to co-operate.. I am, however, a resident, and would like to feedback that notably sites 34-41 are morally wrong. Please see below a list of reasons why:</p> <ul style="list-style-type: none"> • Provision suggested in the Local Plan has the singular aim of creating a University campus in a suburban, residential setting. The nature of London Universities is that they are largely commuter based with spread out campuses. There are no examples of campus universities in London. • This local plan would result in the introduction of 1712 students to be domiciled in the area: 758 currently, 180 in newly council-approved private rooms, 774 in new blocks. This figure does not include private HMOs. • The result of this would be to dramatically change the demographic of the area, so much as to be detrimental, replacing established residential neighbourhoods with transient ones. • London Plan (March 2016) Policy: 2.6: Outer London: Vision and Strategy recognises that one of the key opportunities for Outer London is maintaining and enhancing the high quality of life that is already there. Delivery of “lifetime neighbourhoods” is an important part of preserving this quality of life. • If Middlesex is allowed to dominate the area, Hendon residents will be excluded from every single civic building on The Burroughs. • The overwhelming size and scale of developments will not only destroy the character of The Burroughs and Church End, but also put heritage at risk. • Plans do not follow advice given by Historic England, and could cause significant harm to heritage and conservation areas.

Representor	Section	Summary of Comments
		<ul style="list-style-type: none"> • The only potential development site to be completely removed from plans is Middlesex University's own car park. (Site 37) • Benefits for residents are still undefined. • Loss of parking for clients and customers would irrevocably damage local businesses. • Loss of parking for residents, their visitors and tradesmen would make residential properties on The Burroughs unliveable for families or those with additional needs and those who require a car for work and difficult for anyone. • This would adversely affect the local community and particularly put heritage houses at risk. • Barnet's own guidance documents (Local Plan SDP, Residential Design Guidance, Oct 2016) states that developments must ask the question 'Is there enough parking for residents and visitors?' (Appendix 1, Q10A). • There is no up-to-date parking survey • There is no mention of parking provision for current or future residents. • Public transport is inadequate • We have no idea how the public transport will change post pandemic • Removal of off-street parking is undesirable and dangerous. • Additional parking pressure on residential roads leading off The Burroughs would negatively impact those residents. • On street parking is hazardous for pedestrians and cyclists and causes accidents. Local school children could be put at risk during pick up and drop off. • New homes on the car parks will block out light and cause safety and security issues for local residents. • New homes which will put a strain on infrastructure. • Housing on Burroughs Gardens car park would negatively affect local businesses situated to the rear and side of the car park. • There is no data on the effects of the pandemic and Brexit on population flow. • More than 17 privately owned buildings will be compulsorily purchased, and tenants forcibly moved out their homes. • There is ample opportunity for Middlesex University to develop its campus within its own footprint. <p>I would also like to comment on the fact that while all these sites are proposed for student halls of residence, some are noted as educational and some are noted as community. I cannot see how any student halls of residence are community-based.</p> <p>And finally, what guarantee do Barnet leaseholders living in Barnet freehold properties have that in the next 15 years they will not have CPO's issued on them to further Barnet's "regeneration"?</p>
TFL (Spatial Planning)	Sites 4, 5, 6, 15, 22, 23, 24, 27, 30, 32, 33, 34, 35, 39, 47, 53, 55, 58, 61, 62, 64	<p>These sites all make reference to parking 'requirements' or 'needs', associated parking or replacement parking spaces. The re-provision of parking and any parking associated with new uses should be minimised, taking into account the negative impacts of parking and be justifiable in its own terms, not simply due to its prior availability. Any assessment of 'need' should take into account that the availability of parking creates demand for it and also factor in the extent of alternatives including public transport and active travel for accessing the site in question. Planning for a sustainable London must be based on demand management rather than predict and provide.</p>
NorthWestTwo Residents Association	Site 8 & 7	<p>Regarding the inclusion in Annex 1 – Schedule of Site Proposals of Broadway Retail Park with an indicative capacity of 1007 units and Beacon Bingo with an indicative capacity of 132 units. The council did not involve the community on this aspect of the plan or present this aspect as part of the Engage Barnet process. The only effective consultation has been the consultation on a planning application to build 1050 residential units on this site (the plan for 1007) to which there have been over 2000 objections. The council has not co-operated with neighboring boroughs to form any sort of masterplan for Cricklewood, in the town centre of which this site is, despite half Cricklewood and its town centre falling in neighboring Brent and around a quarter in Camden. Intensive development of these sites would have a major effect on the entire town centre and Cricklewood as a whole. No basis for the indicative Residential Capacity of 1007 residential units on 2.77 hectares is provided. At 363 units/hectare, this would only be in the maximum density range for a Central setting. Cricklewood is not an area with very dense development, large building footprints and typically buildings of 4 to 6 storeys within walking distance of a Metropolitan or Major Town centre; it fits the description of an urban setting of terraced houses and mansion blocks, medium footprints two to four storeys (in fact, two to three), with a small town centre and along an arterial route that in London hardly counts as main. The same applies to the indicative capacity of 132 units on the 0.47 ha Beacon Bingo site. The draft plan says planning application 20/3564 for 1100 units has been refused. This is not true; it has not yet been considered by the planning committee. It has been reduced to 1050. The 2000+ objections to the application, including from within Barnet Council</p>

Representor	Section	Summary of Comments
		<p>("gargantuan", "vast disparity and inappropriateness of scale, height and massing", impact on conservation area, and more), rehearse the many ways in which such high density is inappropriate for the setting and should be undeliverable per the borough's own general and particular policies including those summarized and reviewed in the Tall Buildings Update 2019. Ideally, planning application 20/3564 will indeed be refused and any future application will soundly comply with this local plan's policies for urban setting, the tall buildings and other policies, and the duty of co-operation. If however this indicative capacity remains in the Local Plan, it may be used as a justification for future applications or even, if matters drag on, for application 20/3564, and so it is important that it be rectified at this stage and not left as a threat hanging over Cricklewood. The indicative capacity of the sites should be reduced to mid-range for the urban setting. Necessary adjustments should be made to any other parts of the plan dependent on these values or which led to the use of the current excessive values.</p>
Mill Hill Missionaries	New site	<p>The site represents a logical and sustainable location for future residential-led development. It is Green Belt however it is urban in nature and is surrounded on three sides by built development (the Mill Hill area). It is available, suitable and achievable as a potential housing site in the short-medium term of the Council's Draft Local Plan period and would add flexibility to the Borough's housing delivery targets to ensure that objectively assessed requirements are met in full. The site also represents an opportunity for the Council to plan beyond their plan period and consider a longer term spatial strategy, in line with national planning policy requirements. The site can help to deliver high-quality residential-led development in a well-connected and sustainable location, and thus align with some of the fundamental principles and objectives of the Draft Local Plan. Furthermore, development of the site would deliver a diverse quantum of social, economic and environmental benefits in addition to making an important contribution to meeting the Borough's objectively assessed needs. We consider the site could come forward as part of the proposed strategy set out in the Draft Local Plan as a "other large site" or "windfall site", alternatively, should any further sites be required to meet the shortfall of housing across London overall, we consider Land East of Lawrence Street represents an excellent omission site, which offers the highest sustainability credentials. <i>(For further detail and map see the representation)</i></p>
NHS Property Services	New Site	<p>Oakleigh Health Centre Oakleigh Health Centre is located at 280 Oakleigh Road, N20 0DH. The property is a one storey NHSPS owned site which currently provides GP services. A site location plan is shown at Figure 3 below.</p> <p><i>Figure 3: Oakleigh Health Centre</i></p>  <p>The site is used for health purposes and is expected to stay in this use for the foreseeable future. However, the NHS estate is continually under review, and if for any reason the current need for health facilities in the borough changes and the site is in NHSPS ownership, then an alternative use may be considered appropriate. Any change would be implemented once commissioners have confirmed that it is no longer required for the delivery of NHS services. Alternative uses for the site would then be sought in accordance with Policy CHW01 and considering NHSPS suggested amendments.</p>

Representor	Section	Summary of Comments
		It is not possible to submit the site for an alternative use at this stage. However, NHSPS would like to reserve the ability to explore such an opportunity longer term, subject to ownership and health requirements for the site. Therefore, we would like to include the site as available within the longer term (5 years +).
Hurricane Trading Estate	New Site	We urge the Council to reconsider this proposed designation. More generally, we consider the supporting text to Policy ECY01 is well-founded, and recognises the opportunities presented in London Plan Policy E7 regarding Industrial intensification, co-location and substitution. We support the pursuit of opportunities for the co-location of industrial and residential uses. The Greater London Authority (GLA) has published extensive guidance on industrial intensification and co-location through plan-led and masterplan approaches and offers a viable means of addressing London's housing shortage by making better use of inefficient land. Its Industrial Intensification and Co-Location Study (2018) provides best-practice guidance on successful co-location development typologies which could be applied to the Site and across the Borough more widely. This approach has been a particular success in London Boroughs such as Southwark and we would encourage LB Barnet to make best use of the planning powers at their disposal to follow a similar mixed use growth agenda. The Council has a prime opportunity to allocate the site for mixed-use development, thereby taking a proactive approach to employing an intensification strategy for under-use industrial land. With regards to the supporting text to Policy ECY01, para 9.7.8 states that while manufacturing and other industrial activity are 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. 'Industrial' type businesses require a 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. Further, para 9.2.3 highlights the importance of the new and wider Use Class E to provide greater flexibility to change between uses. As set out at para 9.7.3, Barnet envisages that it will meet identified need through intensification and windfall. Our client's emerging proposals would be flexibly designed to adapt to modern and future trends. It is not considered that retaining the site's existing status as NDIS would hinder its future industrial / commercial output because both London Plan E7 and emerging Policy ECY01 require a comprehensive assessment of the industrial function in any case. However, it would offer greater flexibility in terms of the residential portion of the site. Evidently, the existing condition of the Hurricane Trading Estate is inefficient and offers a relatively low employment yield for the size of site and its location. Further, Travis Perkins have now vacated their former site, leaving it redundant. There is a significant opportunity to not only increase the employment yield offered, but create flexible, modern industrial workspaces that can breathe new life into the location. This opportunity would be stifled if its status was upgraded to LSIS.
CasaBella Developments	New Site	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 statutorily 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 (6-7 storeys). 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): <input type="checkbox"/> 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) – under construction; <input type="checkbox"/> 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) – under construction; <input type="checkbox"/> 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) – under construction; <input type="checkbox"/> 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: H/04167/10) – completed; <input type="checkbox"/> 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, application approved July 2021 (LB Brent reference: 17/2284); <input type="checkbox"/> 363 Edgware Road – Demolition of existing showroom and multi-storey carpark building and erection of buildings 5 – 19 storeys in height to provide 165 residential units with a commercial use (Class E) at ground floor level, together with associated parking, application submitted March 2021 awaiting decision (LB Brent: 21/1124); and <input type="checkbox"/> Crown Honda – Phased mixed use redevelopment comprising of three buildings extending up to 24 storeys providing a range of uses including 470 residential dwellings, office and workspace, flexible community space and associated works, application submitted in August 2020 and

Representor	Section	Summary of Comments
		awaiting determination (LB Barnet: 20/3906/FUL). Site Allocation - The Local Plan should specifically allocate this site in order to provide support for the 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 (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 2021 London Plan encourages such allocations in preparing delivery-focused Development Plans.
Bridge Industrial and Extra MSA London Gateway Ltd	New Site	<p>The existing London Gateway Services site comprises the Welcome Break motorway services, for motorists and commercial traffic going to and from London via the M1 motorway. The existing MSA 'land take' is not fully utilised and the services themselves date back some 50 years. The site includes a significantly larger than required coach interchange which is out of date and is no longer fully needed. The services are in need of renewal and consolidation to provide a modern facility commensurate with the needs of today's motorway users, and consultation with Highways England MSA Policy division has commenced. The redevelopment of the northern section of the overall site creates the opportunity to provide a new and fully up-to-date MSA facility on the southern section of the site, to be operated in conjunction with the existing hotel. This would not be commercially deliverable in isolation and the ability to link the project with the development of the surplus land for employment purposes presents an excellent opportunity to deliver new services at the site. The new MSA facility would make an important contribution to 'road safety', being a significant improvement on the existing facilities. Bridge Industrial, together with Extra and Welcome Break are currently exploring redevelopment opportunities at the London Gateway Services site. The proposals would comprise a comprehensive redevelopment to consolidate and enhance the motorway services, whilst redeveloping the northern portion of the site to provide circa 27,000 sq m of industrial and ancillary office floorspace, with associated HGV loading and parking facilities. An overview of the key planning matters associated with the comprehensive redevelopment of the site is provided below. Given the ever-increasing pressure for suitable and available land to meet development needs, Section 11 of the NPPF strongly encourages both planning policies and decisions to promote an effective use of land in meeting development needs. Para 120 in particular explicitly states that the redevelopment of under-utilised land and buildings should be supported, whilst the utilisation of suitable brownfield land is prioritised. Para 121 and 122 note that local planning authorities should take a proactive role in identifying and helping bring forward land to meet development needs, reflecting current market dynamics. At a regional level, London Plan Policy GG2 echoes the approach outlined above, whereby development should seek to prioritise the development of brownfield land whilst proactively exploring the potential to intensify the use of land to support additional workspaces. Likewise, at a local level Draft Local Plan Policy GSS01 states that all development must make the best use of land, following a design-led approach that optimises the capacity of sites. London Plan Policy E4 clearly states that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided, including for light and general industry and storage and logistics/distribution. The provision of additional industrial capacity above that identified in designated employment locations should be prioritised in locations that are accessible to the strategic road network (our emphasis). The proposed redevelopment of the Gateway Services site is seen to comply with the policy objectives from local to national level identified above. The consolidation of the motorway services, allowing for employment floorspace to come forward, would allow a more efficient use of the site, whilst also providing enhanced and up-to-date motorway service facilities to meet current needs. Likewise, the redevelopment of this brownfield site to provide industrial floorspace would help to meet acknowledged needs for such more employment land in both Barnet and across London. Taking the above matters in to consideration, it is considered that the principle of employment land uses in this location is wholly supported by London Plan policy. The London Gateway Services site represents a deliverable and appropriate brownfield site located outside the green belt adjacent to the strategic highway network. As stated, the existing services are in need of modernisation for the benefit of motorists using the services, improvements which alone would not be deliverable. The comprehensive redevelopment of the London Gateway Services site provides an opportunity to update the motorway services facilities whilst also bringing forward a significant quantum of modern, high-quality employment floorspace within the borough. This addresses a need for additional employment land which the DLP presently fails to acknowledge. We trust that the above representations are of assistance in the ongoing preparation of the Barnet Local Plan. We wish to be kept up to date with the progress of the new Local Plan preparation, and we look forward to further opportunities to engage. We would be grateful if you could acknowledge receipt of these representations.</p>
Hertfordshire County Council	New Site	It is anticipated that Hertsmere Borough Council (HBC) will be consulting on a Regulation 18 version of their emerging local plan later this year (2021). The local plan that is being developed for Hertsmere has been subject to previous consultations in 2017, and 2018, where representations made by HCC have indicated that an additional secondary school site would be required in Borehamwood to meet the need arising from any quantum of proposed growth locally. This is a key consideration at the time of this representation as the Hertsmere local plan consultation document is yet to be published, and the housing numbers in the growth scenario is yet to be finalised. HCC has undertaken a secondary school site search exercise to identify an appropriate solution to meet the pupil yield need that will arise from future growth in the proximity of Borehamwood. The methodology utilised in the site search identified the required site size and site characteristics for a 8FE (form of entry) secondary school (in accordance with BB103); and completed a the sequential site search methodology

Representor	Section	Summary of Comments
		<p>used for searching for a site firstly in the urban area and then secondly in the non-urban area; and, finally completed an individual site analysis followed by site ranking. The site search found that there were no suitable urban sites within Borehamwood itself. This was also the case when exploring the opportunity to deliver split school sites with the built form on one site, and a detached playing field site within a 400m walking distance of the main school site. The sequentially preferred site, which ranked first, following a highways and planning appraisal as a potential site for an 8FE is land south of A411/London Road. This site is in the ownership of HCC, and given the findings of the site search work is deemed as a deliverable solution to meet the secondary school need that is likely to be created by future development within Hertfordshire. The land south of London Road site is a site that sits both within the administrative boundaries HBC (Hertfordshire) and LBB (Greater London). Further feasibility work has demonstrated that there is potential for the buildings required for the secondary school (and associated access arrangements) to be accommodated on land that is situated within Hertfordshire with playing fields and sports pitched located on land within the LBB. In order to deliver the school, HCC are proposing that the area required for school buildings should be removed from the Green Belt if at all possible and allocated as a part of a 'school build zone' within an education allocation on the wider site. This in turn allows the education allocation to be effective, deliverable and comply with the NPPF. Our experience has been that leaving future education sites wholly within the Green Belt has not been acceptable to local plan inspectors. As an example, this approach was accepted by the Inspector at the examination into the soundness of the Three Rivers Site Allocations document in 2014. Excluding the school building zones from the Green Belt would avoid the contradictory necessity of demonstrating very special circumstances at the planning application stage having been specifically allocated within the plan. The Inspector also stated that; <i>"the advantages of planning decisively by removing the building zones from the Green Belt for the specified purpose intended outweigh the disadvantages of the contradictory approach of leaving them within it, and by a very clear margin."</i> This technique allows indicative areas of playing fields, that comprise the remainder of the site, to form a part of the wider education allocation, but remain in the Green Belt. On that basis, HCC requests that is allocated for Education (playing fields) in an approach like that set out above. HCC welcomes the opportunity to work collaboratively with LBB to mitigate the impact of planned growth that will have shared impacts across both authorities. I hope these comments are of assistance and if you require any further details, please do not hesitate to contact me.</p>
TFL (Commercial Development)	New Sites	<p>Colindale Station Although the Council has adopted the Colindale Underground Station Supplementary Planning Document (SPD) we consider that it would help to strengthen the planning position, including Compulsory Purchase, if the site benefitted from the additional weight that can be accorded to a site allocation within the adopted Local Plan. In our view, this should reflect the site and capacity of development that has been granted planning permission. As officers are aware, we are relooking at the viability of the consented residential scheme with a view to finding a new partner to bring this forward, probably as a modified scheme. We would be happy to discuss this further with officers. Land at Golders Green Station Recently, officers have raised the prospect of improvements to the area at and around the station in order to enhance the town centre. TfL CD submitted representations to the Golders Green Town Centre Strategy Consultation in October 2019. As we set out in the comments submitted for that consultation: TfL CD are supportive of the vision for an <i>"improved bus station, providing new shops and facilities and injecting renewed life and vitality into the area"</i>. However, we strongly suggest that the vision also refer to how the redevelopment of Golders Green transport hub should make efficient use of a highly sustainable location and include the provision of residential uses. 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. Redevelopment of the site would align with NPPF paras 108 and 118d and DLP Policies H1, D1 and D8 which aim to focus residential development in the most sustainable locations." The entrance into the bus station and the pedestrian environment is overly complicated and not user friendly, which is exacerbated by having so many roundabouts in the vicinity. Therefore, there should be some consolidation of the public realm and regularisation of the road network, which would enable a more logical layout and create a more pedestrian-friendly environment. TfL CD would like to work with the Council to explore opportunities for this. TfL CD considers that Golder Green transport hub should have a site allocation. Whilst it is acknowledged that the Golders Green Town Centre Strategy has been prepared to provide the detail around development within Golders Green that does not mean that a site allocation cannot be provided in the Local Plan as well, particularly as supplementary planning documents hold less weight than an adopted Local Plan. To realise the transport and public realm benefits sought by the Council at and around the station, and in order for a scheme to be viable, it is most likely to require inclusion of a tall or very tall building/s; this would need to be referenced in a site allocation.</p>
Diocese of London	New Site	<p>h. The suitability of the site for education - 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 5% increase in the number of young people aged 0-19. 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</p>

Representor	Section	Summary of Comments
		<p>facilities on site, which aren't available at other schools in the area, which makes this site more attractive 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.</p> <p>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 95 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. This will make the Local Plan unsound on the basis that it is not justified or based on robust evidence. To rectify this the Council should look to identify sites for school expansion, including the necessary facilities. We consider our site at Moken Hadley can deliver just such infrastructure.</p>
Bridge Industrial and Extra MSA London Gateway Ltd	Evidence Base Employment Land Review	<p>In addition to the inadequacy of the proposed industrial strategy for the borough, it is noted that the economic evidence base underpinning the Draft Local Plan includes both the London Industrial Land Demand Study (LILDS) and the Barnet Employment Land Review (BELR). Both documents are four years old (prepared in June and October 2017 respectively) and are thus considered to inaccurately reflect existing supply and demand for industrial land uses. The LILDS identifies 7.3ha of industrial land would be required to meet industrial needs across the borough; however, given the significant time which has passed since the Study was published, and the effects of the Covid pandemic, this figure is inaccurate. To gain a greater understanding of the currently industrial market within both Barnet and London, and to further assess the applicability of the Barnet Employment Land Review in particular concerning current industrial market dynamics, high-level analysis has been undertaken by Savills Economics team. The analysis can be viewed in full in Appendix One. The five industrial demand scenarios across the draft plan period used within the 2017 BELR are taken from the 2017 LILDS. The scenarios however do not reflect the unprecedented demand for modern, flexible industrial premises that has taken place in Greater London and across the UK in recent years. Barnet's demand forecasts, if used to underpin the emerging planning policies for employment growth in the borough, should account for the critical role that industrial buildings now play in the economy and for the immediate floorspace shortage, which at present they do not. Barnet's approach to employment land does not reflect the reality of the industrial sector having had its strongest year in 2020. Savills Research from January 2021 'The Big Shed Briefing' reported that in 2020 gross take-up in the sector reached 50.1 million sq ft. of floorspace, 12.7 million sq ft. ahead of the previous record set in 2016 and 80% above the long-term average. Consequently, the 2017 BELR's Baseline Projection's methodology results in a general underestimation of future land needs. Another issue identified with the 2017 BELR is that the five scenarios used do not take into account the existing acute shortage of industrial premises in the borough. Barnet needs to address the current shortage, rather than focussing solely on future needs. Four of the five scenarios within the BELR suggest that Barnet could release a further 2 ha to 29 ha of employment land. This is clearly misaligned with today's industrial market dynamics and thus calls into question the reliability of the Review. In addition to the above findings, Savills Economics have also investigated existing industrial market conditions within Barnet. Findings suggest in the first instance that there has been limited if any delivery of new industrial floorspace since 2006, which significantly limits industrial growth capabilities, whilst also contributing to rising industrial rents further impacting operational costs to existing occupiers. Meanwhile, there is not a single available modern industrial building within the borough, with the average age of the five available units being 38 years. There are no buildings of a sufficient specification that satisfy the requirements of occupiers requiring modern premises. Such occupiers require flexible accommodation with sufficient head room, adequate loading areas and direct access to the strategic road network. This demonstrates a lack of available and suitable high quality, modern industrial floorspace within the borough, which is likely to be significantly hindering Barnet's industrial productivity and wider economic growth. At present, the industrial vacancy rate is 1.2% within Barnet, well below the general 8% rate considered by the GLA to be needed to ensure efficient operation of the market. There has also been limited if any industrial development activity in the last 15 years. Following a review of the Barnet Draft Local Plan, it is considered that the proposed strategy for meeting industrial demand across the borough is wholly inadequate and unachievable. Industrial intensification is not expected to deliver any new industrial capacity in the short to medium term. There appears to be no strategy beyond a reliance on intensification to meet the industrial</p>

Representor	Section	Summary of Comments
		needs of the borough, which could see industrial activity stagnate. Likewise, analysis undertaken by Savills Economics demonstrates that the economic evidence base underpinning the preparation of the Local Plan, particularly the BELR, is outdated, and unrepresentative of current industrial market dynamics within Barnet.
Sports England	Evidence Base	<p>The NPPF requires each Local Planning Authority to produce a Local Plan for its area that should be based on an adequate, up-to-date and relevant evidence base. Para 98 requires that: "Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." Sport England raised questions regarding the soundness of the evidence base relating to sport facilities in its comments to the Regulation 18 consultation as follows: "Sport England consider that specific polices relating to indoor and outdoor sport facilities, including playing fields, should be included within the Draft Local Plan and these should be 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, that would steer which types of indoor and outdoor sports facilities need protecting, enhancing and where new facilities, if any, are needed to meet current demand and the demand from future growth. These strategies would provide a clear strategy and action plan with delivery priorities for playing pitches and built sport facilities within the borough and therefore should direct the objectives and policies of the Draft Local Plan. Sport England is aware that the Council are currently developing a Playing Pitch Strategy Refresh which would provide a robust and up-to-date evidence base for any emerging polices. Sport England welcomes that the Council are undergoing this process and is/does intend to provide support throughout the strategy development however since, at the time of writing, this strategy has not been completed Sport England is concerned that the Council appear to relying on the previous Playing Pitch Strategy which has not been updated and appears to suggest different recommendations/actions than what appears in the Draft Local Plan, particularly in relation to the proposed facility mix of the sport hub sites in Policies BSS01 and GSS13. As a result, Sport England has no alternative than to consider that the policies that relate to sport facilities are not based on robust and up-to-date strategies therefore it has to consider that the policies are not sound at this point in time. Sport England, however, expect that once the Playing Pitch Strategy Refresh is adopted and the Indoor Sport and Recreation Facility Study is reviewed this objection should be addressed providing the policies in the Draft Plan are based on the key recommendations and action plan of the emerging strategic documents." Since Sport England submitted the above comments the circumstances have not changed in relation to the Playing Pitch Strategy and the Indoor Sport and Recreation Facility Study and both existing documents are another year older. If an evidence base/strategy has not been reviewed or updated within three years Sport England considers that the data and findings could be out of date. In consequence, given the position appears to remain the same as when Sport England was consulted on the Regulation 18 draft, Sport England does not consider that the draft Local Plan is informed by an up-to-date and robust evidence base in relation to sport facilities and, therefore, is not sound.</p>
Whetstone Properties Ltd	Evidence Base Green Belt Review	<p>In our previous regulation 18 consultation response, we advised that we considered that the draft Local Plan was not sound, as it the Council has failed to correctly identify it's housing need through the standard methodology. This has led it to conclude that it would not be able to establish the exceptional circumstances would not exist under para 140 & 141 of the NPPF (2021 version). In response to this submission, the Council response above states that it considers that the Green Belt Review does not support making the case needed to demonstrate that exceptional circumstances exist to justify a revision to the Green Belt boundary. It also notes that the Council considers that this review should be undertaken through the review of the next London Plan. We again reiterate that this approach cannot be considered to be in accordance with the NPPF and fails to properly assess whether a Green Belt boundary amendment can be justified through exceptional circumstances. The approach taken by the Local Planning Authority in this stance is similar to its approach over housing need. It is far too reliant on the London Plan, which was examined and found sound under the 2012 version of the NPPF, rather than the 2021 version that the draft Local Plan will be examined against. As outlined above, the Local Plan is failing to meet its identified housing need using the standard methodology and the shortfall using this is 44,955 dwellings over the course of the plan period. Therefore, the level of shortfall required to meet its identified housing needs means that the LPA must consider all options available to it, including an assessment over whether the plan meets the requirements of Paras 140 & 141 of the NPPF. In relation to relying on the London Plan green belt review the Panel Report for the London Plan, the Panel concluded that the capacity available within London is insufficient to meet the identified annual need for housing and the potential shortfall of industrial land in the medium to longer term. As such, in the Report they noted the following comments: 455. <i>Conflicting evidence has been provided about the extent of urban brownfield land and brownfield or other land within the Green Belt that might be suitable for sustainable development. The Plan itself observes that some Green Belt land is derelict and unsightly and does not provide significant benefits. In any event it is implausible to insist that the Green Belt is entirely sacrosanct without having considered what it comprises and the impact that it has on wider strategic objectives. Furthermore, the NPPF does not entirely rule out changes to Green Belt boundaries although exceptional circumstances are required to justify this.</i> 456. <i>The Mayor argues that however it is done such a review would take some time to complete. A commitment to undertake one could nevertheless be contained within the Plan. Indeed, from our perspective it would be a logical step to do this as part of on-going future plan preparation and to assess, as an option, whether it would be reasonable to release Green Belt land in order to close the gap</i></p>

Representor	Section	Summary of Comments
		<p>between housing need and supply in London. This is especially given the difficulty of accommodating growth in the wider South East. There is also a need to consider medium to longer term industrial needs. 457. Therefore from the evidence we heard 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. Given the above, the Panel recommended that the Local Plan be amended to include a commitment to a Green Belt review, as the Panel raised a serious concern that the capacity available within London is not sufficient to meet the identified housing need, when the standard methodology is used and a higher need figure required under the immediate review required by the Secretary of State. In the Panel Report consideration was given as to whether there should be an immediate review of the London Plan and they concluded in Para 595 that: "595. Furthermore, the position in London is that capacity for new housing development is finite. Indeed, the Plan relies on re-cycled land. The approach of sustainable intensification can only be taken so far without having an adverse impact on the environment, the social fabric of communities and their health and well-being. Therefore, in our view, there would be little to be gained from requiring an immediate review until such time as a full review of London's Green Belt has been undertaken as recommended to assess the potential for sustainable development there and whether and how the growth of London might be accommodated." Whilst the Panel's comments relate to the whole of London, given the extent of the shortfall and the housing numbers planned for by the draft Local Plan, we would suggest that a very similar position must exist within LB Barnet. Therefore, a full Green Belt review must be required to determine if release of land from the Green Belt can occur, given that the Local Plan will be required to use the standard methodology for its housing numbers, unless it can demonstrate exceptional circumstances. By attempting to rely on a future Green Belt review at a wider spatial level, the LPA are attempting to kick the can down the road, when it comes to properly planning to meet its identified housing need. The London Plan was adopted under the basis of 2012 NPPF and in recognition that it was failing to meet its identified housing need or properly assess if Green Belt released could be permitted under the NPPF. The draft Local Plan will not be afforded the same opportunity, as it will not be assessed under the 2012 NPPF, so it will need to plan for higher housing numbers which include properly considering whether the test of paras 140 and 141 of the NPPF. Provided as Document 2 is a detailed site assessment of our client's site. This provides a comprehensive assessment of their candidate site, which shows that it is free from any technical constraint that could not be suitably mitigated against by a well designed residential development. It also demonstrates that a residential development at the site would not conflict with any of the purposes for Green Belt, as outlined under para 138 of the NPPF.</p>
Mays Lane Gospel Hall Trust	Evidence Base Green Belt Review	<p>Our 2020 representations highlighted the following in respect of this specific site and how it was considered by LUC in their 2018 Green Belt Review:</p> <ul style="list-style-type: none"> - Checking unrestricted sprawl of large built-up areas – the Review concluded that the eastern part of the site performed weakly in respect of checking the unrestricted sprawl of built up areas. This is agreed given that the existing meeting hall on-site comprises a large single storey building adjacent to residential development. - Preventing neighbouring towns from merging into one another – the Review concluded that the site performed weakly in this regard which again we agree with due to there being no risk here of neighbouring towns merging in this location. - Safeguarding the countryside from encroachment – the Review concluded that the eastern part of the site performed weakly in this respect which is agreed given the existing building on-site. - Preserving the setting and special character of historic towns – the Review concluded that the entirety of the site performed weakly in this regard which is agreed given that the western boundary provides a natural buffer to the countryside from the boundary of the built settlement, and that there would be no harm to the setting of any historic towns. - Assisting in urban regeneration – this is the only criteria where the site was considered to contribute strongly towards a Green Belt purpose, but only because LUC took a blanket approach to the entire Green Belt rather than assessing sites on an individual basis. This blanket approach undermined the whole study as it was clear there was no site specific circumstances taken into account and that all existing Green Belt land was considered in the same way. It remains clear that the eastern part of the 310 Mays Lane site does not perform well to any of the primary functions of the Green Belt which is agreed by the 2018 Green Belt Study and therefore our position remains that the boundaries are revised accordingly to address this, taking this part of the site out of the Green Belt.
Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	<p>"However, where these criteria are not met the parking standards should be increased to 0.5 spaces per unit for car club schemes where suitable, to encourage movement around the borough" This sentence should be reviewed as the reference to car club schemes does not make sense. Car club schemes should be encouraged at all developments, regardless of PTAL, subject to discussions with car club operators as to the long-term viability of such schemes.</p>
Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	<p>"To enable orbital PTAL to be determined easily the Council recommends that a customer facing webbased calculation tool be devised." Should Orbital PTAL assessments be required by LBB, it is imperative that a consistent means of calculating a site's Orbital PTAL is produced. This should be available free of charge and regularly updated by LBB to ensure it remains current and valid. An Orbital PTAL tool should already include the orbital distance calculations for each bus route, as per the methodology presented in Appendix A. This webbased calculation tool should account for future PTALs as per TfL's WebCAT. It should also allow for manual calculations to ensure developers are able to account for potential new bus stops or services, pedestrian routes, etc. that would</p>

Representor	Section	Summary of Comments
		affect a site's public transport accessibility. Furthermore, consideration must be given to incorporate the WLO scheme into Orbital PTAL calculations should this approach be progressed further.
Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	"Whilst the public transport accessibility in these areas is poor" This para relates to locations with PTAL 2 to 3, which TfL's guidance states are defined as 'poor' and 'moderate' respectively. Therefore, "poor" should be replaced with "poor to moderate" to reflect this.
Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	under 'PTAL 5' section "Where Controlled Parking Zones (CPZs) are in place and orbital PTAL is calculated to be more than or equal to 4, we recommend the new London Plan is adopted by the LBB and developments should be car-free. However, where these criteria are not met the parking standards should be increased to 0.5 spaces per unit for car club schemes where suitable, to encourage movement around the borough, with developer contributions towards enhancing bus services to improve the orbital accessibility of the local area and extending Controlled Parking Zones." TfL has raised significant concerns with the Orbital PTAL methodology and it is queried whether financial contributions made by developers to TfL for improving orbital bus services would be allocated as such by TfL.
Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	Highfield Avenue, Brent Cross' – "This will further enhance the radial PTAL to a score of 6" This sentence should be amended as the para above it states that the radial PTAL would already be a 6a for Highfield Avenue, even before the introduction of Brent Cross West rail station.
Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	To reflect Policy T6, Part A of the London Plan, wording in this and subsequent chapters should be amended so that the analysis allows for future PTALs (as defined by TfL's WebCAT or manual calculations) rather than current PTALs.
Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	The text states that rail and underground services in LBB can all be categorised as radial routes, so only bus services need to be considered as part of Orbital PTAL calculations. Whilst it is stated at the bottom of page 23 that WLO would improve the Orbital PTAL for Highfield Avenue, Brent Cross; LBB should confirm what amendments would be required to the calculations when accounting for the WLO.
Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	The data referenced in these chapters is relatively old and more recent datasets could provide a more current perspective on trends in car club use and online shopping.
Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	"It is acknowledged that less than 1% of households actually apply for 4 parking permits, it is suggested that the current policy of issuing 4 permits per household to new residents in developments located in, or adjacent to, CPZ areas is reviewed." BXS LP supports the principle of Barnet's review of its parking permit policies for households within CPZs.
McCarthy and Stone Retirement Lifestyles and Churchill Retirement Living	Evidence Base – Viability Assessment	For further detail see the report document. Conclusion: Specialist older persons' housing typologies were not tested at all in the LPVS, which is atypical of viability evidence supporting emerging Local Plans in our experience and directly contrary to best practice. The affordable housing requirement for older persons' housing in Policy HOU 01 is therefore entirely reliant on the viability testing of the London Plan. The Respondents as part of a Retirement Housing Consortium have repeatedly voiced their concerns about the affordable housing threshold approach and the viability evidence underpinning this in the London Plan. As the Barnet Local Plan Review will be determined against the NPPF (2021), with its increased emphasis on robust viability assessments at the plan making stage, it is the Borough's responsibility to ensure its planning obligations regime is sufficiently robust and justified. The evidence we have provided in our viability appraisals for Sheltered Housing and Extra Care Housing typologies, concludes that these forms of development should be exempt from affordable housing provision.
Mays Lane Gospel Hall Trust	Evidence Base Green Belt Review	The Council has failed to fully consider and assess whether the requirements of paras 136 and 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. Releasing Green Belt land is necessary to: - Meet housing needs including a range of different tenures and sizes; - Deliver necessary infrastructure; and, - Increase affordability while maximising development on brownfield land within the built up settlement area. Certain 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.

Representor	Section	Summary of Comments															
		<p>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 within the Green Belt, the site at 310 Mays Lane meets the tests which make it deliverable. We do not consider this approach of taking a blanket approach to ruling out any Green Belt release 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. Releasing appropriate Green Belt sites such as 310 Mays Lane which do not perform the key functions of Green Belt land should be seen as a necessity to meet housing need in the area, including aiding the delivery of family sized homes and important infrastructure. 310 Mays Lane is a deliverable and available site which should be considered as being able to make a modest contribution to family sized accommodate in this part of the Borough. The expansion of the Council's key growth areas such as Colindale, Edgware, New Southgate etc are principally dominated by taller apartment blocks which generally lend themselves more to smaller apartments. Sites such as 310 Mays Lane can deliver purpose built, family sized houses which would make a valuable contribution towards this type of tenure in the Borough We urge the Council to follow the example recently taken by LB Enfield in exploring the potential of the Green Belt to meet housing requirements, rather than taking a blanket approach to resist any Green Belt release to 'assist in urban regeneration'. The draft Local Plan is evidently not sound as currently drafted when assessing against the tests of soundness set out in Para 35 of the NPPF. If you have any queries about the contents of these representations, please do contact Daniel Watney LLP to discuss further.</p>															
Diocese of London	Evidence Base Green Belt Review	<p>The have carried out a Stage 1 Green Belt Assessment as part of the Local Plan preparation. The site was assessed as having a strong contribution to 4 purposes of the Green Belt and a relatively weak contribution to purpose 2. Firstly, 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. The broad assessment of the Green Belt fails to fully assess refined sites. Furthermore, this Sevenoaks Local Plan was recently declared unsound and the Inspector was heavily critical of their approach which was similar to Barnet's approach. We have 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 Para 138 of the 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 above 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.</p> <table border="1" data-bbox="477 762 1675 1372"> <thead> <tr> <th data-bbox="477 762 779 790">Purpose</th> <th data-bbox="779 762 958 817">LUC's Assessment</th> <th data-bbox="958 762 1675 790">Our Assessment</th> </tr> </thead> <tbody> <tr> <td data-bbox="477 817 779 928">Purpose 1 Assessment – to check the unrestricted sprawl of large built up areas</td> <td data-bbox="779 817 958 845">Strong</td> <td data-bbox="958 817 1675 874">The site is boarded to the south and east by Mount House School and residential development situated in the Green Belt.</td> </tr> <tr> <td data-bbox="477 928 779 1034">Purpose 2 – To prevent neighbouring towns from merging into one another</td> <td data-bbox="779 928 958 983">Relatively weak</td> <td data-bbox="958 928 1675 1040">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.</td> </tr> <tr> <td data-bbox="477 1034 779 1168">Purpose 3 - To assist in safeguarding the countryside from encroachment</td> <td data-bbox="779 1034 958 1062">Strong</td> <td data-bbox="958 1034 1675 1177">The site contains an area of dense mature trees to the south west with Mount House School situated on the southern boundary of the site which contains the site the south. There are a number of non-green belt uses to the north east which the site does not contribute towards safeguarding.</td> </tr> <tr> <td data-bbox="477 1168 779 1372">Purpose 4 – to preserve the setting and special character of historic towns</td> <td data-bbox="779 1168 958 1197">Strong</td> <td data-bbox="958 1168 1675 1372">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. In any case, the main objective of this purpose is to protect the Green Belt setting of historic towns and cities such as Oxford or York where there is an intrinsic link between Green Belt and setting of the city, this does not apply to London in the same way.</td> </tr> </tbody> </table>	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 dense mature trees to the south west with Mount House School situated on the southern boundary of the site which contains the site the south. There are a number of non-green belt uses to the north east which the site does not contribute towards safeguarding.	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. In any case, the main objective of this purpose is to protect the Green Belt setting of historic towns and cities such as Oxford or York where there is an intrinsic link between Green Belt and setting of the city, this does not apply to London in the same way.
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Representor	Section	Summary of Comments
		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.
Barnet Labour Group	Evidence Base - Population	On the basis of current projections up to 2036, Barnet's population is expected to reach 452,000. [from 400,000 now]. However, London is now predicting a fall in population, mainly inner-city, our projections should not be based on old figures, we should wait for the 2021 census figures which will be available next year. A caveat should be added to the document, therefore, that the housing target could be reduced if the new projections show a smaller rise or even a fall.
Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base Strategic Transport Assessment	We support the principles of the Strategic Transport Assessment; however, there needs to be a monitoring and review mechanism to understand the mid- and long-term impacts of COVID-19 on travel behaviours and transport networks across Barnet. Furthermore, monitoring should establish the accuracy of the assumptions (e.g. around committed highway schemes) and assessments inherent within the Strategic Transport Assessment and the TfL strategic transport models that have been used. The monitoring must also allow Barnet to understand its progress towards targets identified in the Mayor's Transport Strategy and Barnet's LIP. This additional monitoring should be captured as part of further indicators within Table 24 of the Local Plan. This would ensure that the soundness tests, as set out in the NPPF, namely the effectiveness of the mitigation and measures identified within the Local Plan.
Ropemaker Properties Ltd	Map 40	Map 40 as shown on the Changes to the Policies Map (Reg 19) 2021, does not relate to the Garrick Industrial Centre. What is shown appears to relate to Granard Business Centre and is a duplicate of Map 42. Map 40 therefore does not fulfil its legal requirements in showing the boundaries of the Garrick Industrial Centre LSIS and the Plan is therefore unsound on this basis. The error on Map 40 should be corrected to show the Garrick Industrial Centre LSIS boundary (as existing) and the proposed area of LSIS to be added
Haringey Council	Duty-to-cooperate	The London Borough of Haringey adopted a new suite of Local Plan documents in July 2017. These were informed by engagement with Barnet through the plan-making process. Haringey remains committed to engaging with Barnet through the plan-making process, working together on strategic matters and cross-boundary issues, particularly in respect of the New Southgate area where both boroughs have strategic objectives for managing growth and development. In this regard, please find our comments on the Barnet Draft Local Plan below.
Barnet Green Spaces Network	New enforcement policy Para 12.3.1	Enforcement is a key component of the planning regime and vital if good planning outcomes are to be achieved. The plan contains a statement at the para 12.3.1 which suggests a strong approach yet is very heavily caveated and should be strengthened along with the inclusion of a specific enforcement policy. Amend Para 12.3.1 to read as follows: " <i>The Council aims to will ensure that all 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.</i> " Add new policy on enforcement: <i>Effective enforcement action will be taken by the Council in all cases where there is a breach of planning permission including noncompliance with conditions.</i>
Roger Chapman	New policy	Climate Change is already having adverse impacts on the country of which recent rainstorms in London is one small example. These have been well articulated in numerous research studies and by central government. The approach to building design within the plan fails to adequately address the seriousness of the current situation and needs to be amended if it is to be found sound. Of particular, but not inclusive note, in recent times is the publication by Historic England "Heritage Counts" in 2020. This early research shows that sympathetically upgrading and reusing existing buildings, rather than demolishing and building new, could dramatically improve a building's energy efficiency and would make substantial energy savings because the CO ₂ emissions already embodied within existing buildings would not be lost through demolition. The logical end of this debate is to seek the creative reuse of all existing buildings in preference to demolition and thus make a key contribution to tackling CO ₂ increases. Add new Strategic Policy GSS14 Development proposals should recycle and reuse existing buildings instead of building new to address increasing CO ₂ emissions which cause climate change.
Barnet VCS Environmental Network.	New Policy	London became the world's first National Park City on 22 July 2019. This is not recognised by the plan. London National Park City is a movement to improve life in London working with residents, visitors, and partners to: Enjoy London's great outdoors more; Make the city greener, healthier and wilder; Promote London's identity as a National Park City. Add new policy supporting the principles of London National Park City and amend relevant policies in line with these principles.
Barnet VCS Environmental Network.	New Policy	Rewilding. No mention can be found about the importance of rewilding in Barnet. Enfield Council have taken a lead locally on such approaches. We propose a new policy should be added identifying key areas for rewilding in the borough, include such areas in the Draft Barnet Infrastructure Delivery Plan.

Representor	Section	Summary of Comments
Barnet VCS Environmental Network.	New Policy	Reuse of buildings. Substantial amounts of carbon are embodied in our existing built environment. Demolition of buildings releases this carbon and adds to emissions driving climate change. This should stop. Add new policy making it obligatory to stop the demolition of all existing buildings and press for reuse. New building can be added to existing.
Barnet VCS Environmental Network.	New Policy	The value and importance of trees and hedges to our biodiversity and environment gets short shrift in the plan. Hedges get limited mention and Trees are subsumed within generalised policies. We propose a strengthened, separate policy to protect existing Trees and hedgerows and promotion of new hedges, trees and additional landscaping in new proposals coming forward.
Barnet VCS Environmental Network.	New Policy	B-lines – No mention is made in the plan of these pollinator highways, promoted by Buglife as part of the Governments pollinator strategy. The north-south corridor through London cuts across parts of the borough including parts of Finchley and New Southgate where there is a growth area and a number of site-specific proposals. https://www.buglife.org.uk/our-work/b-lines/ We propose that B-lines should be added to the Key diagram, proposals map, appropriate policies and site-specific proposals.
Barnet VCS Environmental Network.	New Policy	Temporary use of sites for open space. There is a policy on 'meanwhile uses' for temporary housing but not for open space. We propose the addition of a new policy supporting temporary use of development sites for open space and community growing projects.
Barnet VCS Environmental Network.	New Policy	Front garden use for car parking. The Local plan contains no policy to prevent turning front gardens into car parking on those roads where planning permission is required. See issues and evidence involved here. https://frontgardens.nationalparkcity.org/ We propose a new policy opposing use of front gardens for car parking.
Barnet Green Spaces Network	New Policy	Within some policies e.g. GSS02 and town centres policy there is some support given to "meanwhile uses" though in the glossary and supporting text the emphasis is on Temp use of sites for housing. However, the approach is not a general one across all sites in the borough and this requires amendment. Thinking in this area is developing fast and recent publications such as the Arup report Meanwhile Use for London demonstrates how this policy can be taken forward as a contribution to COVID recovery. It is an especially important area for creating temporary additional open space, growing space, parklets etc which will assist in COVID recovery and engage with local communities. New Policy GSS14 Meanwhile Uses Meanwhile uses for vacant buildings and land across the borough will be supported. The Council will work with landowners and local communities to encourage the use of such sites for a range of meanwhile uses including open space, food growing spaces and parklets as well as temporary housing. Include additional supporting text and note on: Engaging with the community; Developing a database of meanwhile sites and looking to marry them up with alternative users. Funding opportunities available for developing meanwhile uses. Glossary Review glossary definition to include references to open space and growing space provision. Meanwhile Uses policy has been developing quickly and in response to the COVID pandemic. This is the opportunity to get the policy right and make it relevant across Barnet and not just in specific areas of the plan. This should be subject to examination.
Barnet Green Spaces Network	New policy: London National Park City	The London National Park City is a movement to improve life in London working with residents, visitors and partners to: Enjoy London's great outdoors more - Make the city greener, healthier and wilder - Promote London's identity as a National Park City. It is supported by the Mayor of London and one target is to physically seek to make London 50% green. The vision and aspirations of the movement should be reflected in the Barnet Local Plan which lacks ambition in this respect. Proposed new Policy: GSS14 London National Park City - The Council supports the establishment of the London National Park City. Development proposals must avoid adding to the loss of nature and habitats in the Borough and instead aim to contribute to the capitals green-blue infrastructure when creating new or renovating existing built environment. The use of previously developed "brownfield" land whilst desirable also requires care and attention to retain particular natural features and species that have come to occupy them having been displaced from other locations. The London National Park City is a relatively new area for planning policy and will need examination and discussion. The lack of ambition in the plan for high quality green design needs debate.
TFL (Commercial Development)	General	Our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning will provide a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties. TfL CD is working with the Council to deliver mixed-use development and new homes across the borough. Across our portfolio of London sites, TfL CD will be delivering 50% of new homes / habitable rooms as genuinely affordable housing in a range of tenures. In Barnet, our schemes will range from policy-compliant 35% affordable housing and up to 100% – please see below. Our partner Kuropatra is nearing completion of 97 new homes at Beechwood Avenue (50% affordable housing) and Pocket Living is due to start work shortly on building 86 new homes at our site to the west of Woodside Park station (100% affordable housing – discounted market sales). We have received planning permission to build 313 new homes as part of a comprehensive development which delivers a new station ticket hall building at Colindale Avenue (50% affordable housing). housing development opportunities at High Barnet station and on land to the east of Dollis Park within the next six months. In addition,

Representor	Section	Summary of Comments
		<p>we have a portfolio of major sites that we will be looking to develop in years to come – focussed on delivery of optimal, high quality housing and public realm around stations – in areas such as Edgware town centre, Finchley Church End, East Finchley and Mill Hill. All of TfL CD's projects are focussed on delivering optimal, high-quality housing, within schemes that relate to and strengthen their neighbourhoods, which make places that people are proud to live in, and which are founded on transparent engagement and best practice. As one of the biggest public sector landowners in the borough, TfL is a very important partner to deliver high-quality housing in the borough and we have a strong appetite to continue working with the Council to achieve this. TfL CD has previously submitted representations on the emerging Local Plan at the Regulation 18 Issues and Options stage. As we have previously stated, TfL CD broadly supports the draft Plan's vision for sustainable 'good growth', including the delivery of a significant amount of new housing throughout the plan period to meet LBB's housing needs. In addition, we consider that the draft Plan, taken as a whole, is generally legally compliant, sound and compliant with the duty to cooperate. However, we do have a number of representations in respect of specific policies, supporting text and site allocations. NPPF The Local Plan will need some redrafting to refer to the July 2021 version of the NPPF. In particular for references to: the use of Article 4 Directions; the use of masterplans, design guides or codes (including the National Design Guide and National Model Design Code) to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community; the significant weight to be given to outstanding or innovative designs which promote high levels of sustainability; improved street design; the emphasis on incorporating trees in new developments and streets; and the faster delivery of public service infrastructure.</p>
Brent Cross South Limited Partnership ('BXS LP'),	General	<p>Given the complexity of land designations, delivery mechanisms and land ownerships within the Brent Cross/Cricklewood Opportunity Area, it is important that the Plan is clear and consistent in its use of terminology when referring to the Opportunity Area and its constituent and related parts. However, we feel that there are areas of the Plan where the terminology could lead to confusion.</p> <ul style="list-style-type: none"> • Throughout the Draft Plan, 'Brent Cross' is used interchangeably to describe the Growth Area and the wider Brent Cross/Cricklewood Opportunity Area, as well as used to describe the Brent Cross area of the borough generally. This should be clarified so that the Brent Cross Growth Area and Brent Cross/Cricklewood Opportunity Area are always referred to by their full name (being careful to ensure that the latter is consistent with the London Plan 2021). • It should be made clearer how the Growth Areas designated in the Plan relate to and reflect the Opportunity Area as designated in the London Plan 2021. A map showing the Brent Cross/Cricklewood Opportunity Area (including West Hendon and Cricklewood Town Centre) with the Growth Areas delineated with it would be helpful, perhaps at the beginning of Chapter 4 of the Plan. This would help to show the interrelationship between these designations, rather than showing the three growth areas on three separate maps. • The impression is given that the outline planning permission, which is referred to throughout the Plan, covers only the Brent Cross Growth Area. However, the red line boundary of the outline consent also applies to parts of the Brent Cross West Growth Area and a very small part of the Cricklewood Growth Area as designated in the Plan. • The name of the Brent Cross West Growth Area is confusing as this is the name used in the outline planning permission and subsequent applications to describe the sub-area where the new Thameslink Station is being developed. We suggest an alternative name is adopted to avoid confusion. • We would suggest that the terms used to describe the constituent parts of Brent Cross Growth Area – including Brent Cross Town – are included within the Glossary (the term 'Brent Cross Town' is used several times before it is fully explained in Chapter 4). <p>We have highlighted in the table below the specific instances where the terminology might be changed to provide clarity.</p>
Peter and Nargis Walker	General	<p>The plan is to be delivered between 2022 and 2036. There is no breakdown of how and in what order change will be delivered. It is possible that as before, some of the headline changes – high density housing crammed into already crowded town centres - will be prioritised to meet central government requirements. Meanwhile, the improvements to infrastructure, green spaces and quality of life, could well be deferred and possibly even dropped altogether, for lack of funds at a later date. Before any works are begun it is important to publish a clear timeline for delivery of the plan. This must include the proposed management of the massive disruption to local lives and severe traffic congestion such a building programme will cause at an already congested junction, where traffic is often at a standstill during the day. The fact that all of these changes are to be managed by CAPITA, a company to which so many of our current services have already been outsourced and have suffered as a result of being managed at distance from call centres elsewhere in the country, does not create confidence. Below are some of the other headline points for discussion in the plan.</p>
Peter and Nargis Walker	General	<p>We agree that there is a clear need for new, affordable housing for rental and purchase as family homes in Finchley Central. However, what the current pandemic has demonstrated is that what people want and need is small scale, affordable family housing to rent or buy. This would include outdoor space, schools, communal spaces for play and recreation, and supporting services. Homes where it would be possible to build thriving local communities. This plan will not deliver any of this.</p>
Peter and Nargis Walker	General	<p>The plan proposes building densely packed high rise blocks, with no access to outside space and concentrated in town centres, near existing Underground access. This is land easily available from a cash strapped TFL, and will provide density of housing in a small space. Whether any of the housing will be</p>

Representor	Section	Summary of Comments
		<p>genuinely affordable or desirable is a moot point. In Finchley Central in particular, erecting four 20 storey high rise blocks that loom over both the High Street and residential areas, is directly contradictory to other stated aims in the document; i.e. maintaining the character of the area (essentially that of a low rise suburb), and creating a cleaner, greener environment. It will place excessive strain on an already struggling infrastructure of roads, on parking and traffic, and have a negative impact on local businesses. Engaging Wimpey Taylor to develop housing that is sustainable and to a high quality standard, when they are known to have opposed plans to cut emissions in new homes, https://www.theguardian.com/business/2021/jul/05/housebuilder-taylor-wimpey-opposed-plans-cut-new-home-emissions is highly questionable. In what way would this be high quality, sustainable, or environmentally friendly?</p> <p>The type of build that is being proposed, prefabricated units in high rise build is also worrying. These builds are unproven from the point of view of safety, in particular the fire risk as demonstrated by recent events in buildings in Shetland where this method was used https://www.bbc.co.uk/news/uk-scotland-north-east-orkney-shetland-57942459 Does Barnet really need a potential Grenfell?</p>
Queen Elizabeth's School	General	<p>The School supports the Regulation 19 Plan in general. The comments raised in this representation would enhance the “soundness” of the Plan in line with para 35 of the NPPF (“NPPF”) (February 2019) to ensure the Plan is positively prepared, justified, effective and consistent with national policy. The recommended revisions would ensure that the Regulation 19 Plan fully endorses the provision of educational facilities that are necessary to sustain the academic excellence of schools such as Queen Elizabeth's School and supply the community infrastructure to support planned housing growth. We will of course be pleased to clarify and/or discuss these representations at any time.</p>
Bridge Industrial and Extra MSA London Gateway Ltd	General	<p>We write on behalf of our clients Bridge Industrial (Bridge) and Extra MSA London Gateway Ltd (Extra), to submit formal representations to the Barnet Local Plan. These representations concern the policies in the draft Plan in relation to the provision of employment land and specifically in respect of land at London Gateway Services, Edgware, HA8. The entire site as edged red on the enclosed site location plan is owned freehold by Extra MSA London Gateway Ltd, a wholly owned subsidiary of Extra MSA Group. The company is in discussions with Bridge and also with Welcome Break (the tenant operator of the services) in relation to the redevelopment of the site.</p> <p>Extra MSA Group is the freehold investment owner of this site and eight other Welcome Break tenant-operated MSAs, in addition to being the owner of 10 other MSA property assets in the UK. These provide a range of important facilities for motorway users including fuel and EV charging, food and drink, overnight accommodation, meeting facilities and parking. Bridge Industrial is an integrated real estate company and investment manager, focussing on the acquisition and development of land and existing industrial facilities in both the U.K. and the U.S. Since their expansion to the U.K. in November 2020 Bridge Industrial has assembled a pipeline of sites intended to come forward in the next few years, demonstrating their commitment to investing in the U.K. market in the short and long-term. These representations, prepared by Savills London Planning, are supported by an analysis of industrial land supply in Barnet, prepared by Savills Economics. The analysis also includes a review of the 2017 Barnet Employment Land Review, which has helped to inform the Barnet Draft Local Plan and the relevant policies therein. The analysis can be viewed in Appendix One of these representations. The London Gateway site is located in northwest Barnet, measuring approximately 8 hectares in total. The site comprises the Welcome Break motorway services, accessible from the M1 motorway for motorists travelling to and from London. The main services building is located to the southeast of the site, adjacent to coach and car parking facilities. There are additional coach parking facilities to the north and south of the Welcome Break services building, together with a petrol station. Along the northern site boundary sits an area of dense vegetation, with a hardstanding storage area. Motorists enter and exit the site from the M1, whilst the site itself is also accessible to employees via a service road leading from Ellesmere Avenue to the south. The site is enclosed to the immediate north and east by the M1 motorway, and by the West Coast mainline railway line to the immediate west. There is a Ramada Hotel (c200 bedrooms with ancillary restaurant and meeting rooms) located immediately adjacent to the site to the south (and also operated by Welcome Break), with built development extending further southwards and westwards from the site. The site is not located in a conservation area and it does not contain any statutory or locally listed buildings, nor are there any statutory or locally listed buildings in the surrounding area. Green belt land extends to the wider north, east and west of the site although the site is very well separated from the green belt by the substantial infrastructure of the motorway and railway lines. The site is located within Flood Zone 1 which represents the lowest probability of flooding from rivers or the sea. The closest bus stops to the employee site entrance at Ellesmere Avenue are located circa 480 metres northeast along Barnet Way, providing frequent services to destinations including Cockfosters, Colindale and Edgware. We consider that the draft Local Plan (DLP) fails to properly understand the need for new employment land in the borough, or to make any provision for new sites to come forward. Further provision should be made in order to meet a pressing need and the London Gateway Services site provides an excellent opportunity to develop new high quality logistics employment facilities, immediately accessible to the strategic road network, on a brownfield site outside the green belt and away from any residential areas. At the same time the existing motorway services are of some age and are in need of upgrading to meet current needs. There is surplus land on the site and it should be allocated in the DLP for mixed-use development comprising a replacement motorway service area and new employment land.</p>

Representor	Section	Summary of Comments
Oakfield House, Burtonhole Lane, Mill Hill	General	<p>The need to deliver 35,460 new dwellings over the next 15 years is acknowledged and is based on the London Plan 2021, however, it is not considered that the impact on Mill Hill has been fully explored or appreciated. Mill Hill started its life in the 15th Century as a rural part of Hendon, but by the 18th Century estates, comprising large houses were being formed, attracting staff for the houses and estate workers to the area. Many of these houses exist today, however, many were lost to housing and commercial development, a trend that continues today. By the late 60's Mill Hill had developed into an outer London Suburb typical of others in the London fringes. However, through the introduction of Green Belt policy and the work of the Mill Hill Preservation Society, Mill Hill still benefits from the retention of large properties in green space, which is still in agricultural or institutional use. The feeling of green is what makes Mill Hill desirable and forms an integral part of its character. With the closure of many of the institutions within the area, this character and history is being eroded as the sites are lost to dense residential development. To date Mill Hill has seen the following extent of development: - Inglis Barracks. Closed in 2007 Outline planning permission was approved in September 2011 for: "the comprehensive redevelopment of the site for residential led mixed use development involving the demolition of all existing buildings (excluding the former officers mess) and ground re-profiling works, to provide 2,174 dwellings, a primary school, GP Surgery, 1,100sqm of 'High Street' (A1/2/3/4/5) uses, 3,470sqm of employment (B1) uses, a district energy centre (Sui Generis) and associated open space, means of access, car parking and infrastructure (with all matters reserved other than access). Full application for the change of use of former officers' mess to residential (C3) and health (D1) uses." Reserved Matters have been submitted on a phased basis and is still under-construction. As a result of increased densities across the site, a further full planning permission was granted for an additional 82 residential units and 615sqm of employment space. Total 2256 dwellings National Institute for Medical Research. Full planning permission approved in December 2017 for: "Redevelopment of the site to provide 460 new residential units following demolition of all existing buildings. New residential accommodation to consist of 448 self-contained flats within 19 blocks ranging from three to nine storeys with basement car parking levels and 12 two storey houses with lower ground floor levels. Associated car and cycle parking spaces to be provided. Provision of new office (B1a) and leisure (D2) floorspace and a new publicly accessible café (A3). Reconfiguration of the site access and internal road arrangements and provision of new publicly accessible outdoor amenity space. New associated refuse and recycling arrangements" A further full planning permission was granted in November 2020 for: "the construction of 5 buildings of between 5 - 8 storeys in height, with associated basement, comprising up to 189 residential units and provision of new office (B1a) and leisure (D2) floorspace and a new publicly accessible café (A3). Associated car and cycle parking, refuse storage and amenity space" An additional application was then granted in June 2021 for: "Alterations to the basement, lower ground, upper ground and first floor of the existing Block A Building to provide 16 new residential units, a gym, and a cafe, including associated alterations to landscaping and car parking" Total 665 dwellings - IBSA House. Application for full planning permission pending consideration for: " Demolition of existing printworks/factory buildings and redevelopment of the site (to provide a total of 197 residential units) including conversion of the existing IBSA House office building into 61 flats with associated external alterations. Erection of 5 no. new blocks ranging from 3 to 6 storeys in height to provide 136 flats. Provision of private amenity space, communal rooftop terraces, refuse storage, 344 cycle parking spaces and basement and surface level parking for 197 cars. Single storey extension to the existing gate house to provide management/security office. Associated alterations to landscaping and ancillary work" Total 197 dwellings In addition to the above, smaller scheme amounting to some 57 dwellings have been approved. This draft Local Plan seeks to add a further circa 470 dwellings to this total. In addition to the residential development, the commercial development also generates an impact. At present an application for a B8 storage and distribution depot for Amazon is currently pending consideration by the Local Planning Authority. The scale of this development alone, (with the potential for in excess of 300 additional traffic movements in the AM peak period) on the edge of Mill Hill (Pentavia Retail Park) will have a huge impact on the road network in and around Mill Hill, which their own Transport Assessment shows is operating at capacity. This should sit aside the recent news that a new movie studio is coming to the area also. As a result of this quantum of, in part completed, but also committed development, the impact on Mill Hill has been enormous. Traffic flows before the pandemic were ever increasing, with the main road networks reaching, if not exceeding, theoretical capacity and on street parking, primarily as a result of inadequate parking provision within the new developments, becoming a norm and obstructing the free flow of traffic, thus exacerbating the traffic issues locally. See photographs at Appendix 1. Mill Hill is a Conservation Area, designated for the first time in 1968 and last reviewed in 2008. The designated area also benefits from an Article 4 Direction which removes many domestic permitted development rights. The Conservation Area map is attached at Appendix 2. The Conservation Area Appraisal at Appendix 3 identifies a number of notable views and vistas many of which are now dominated by on street parking, including the northwest views along The Ridgeway which are framed by heavy planting. It proceeds to advise that "Much of the open spaces and fields that contribute to the rural and open character of the conservation area lie beyond its boundaries. However areas within the conservation area such as the green fields around Nan Clarks Lane and Highwood Hill, the open and spacious setting to the large institutional buildings on the northern side of The Ridgeway and the school playing fields bordering Wills Grove, add to this rural quality." Generally the Conservation Area Appraisal acknowledges that the following list, which is not exhaustive, are having negative effects on the quality of the Conservation Area - :Trying to balance traffic and associated noise against the character of the area. - Pressure resulting from declining religious communities on the development of their institutional buildings and sites that form part of the character of the area. - Associated pressure on the need to increase capacity in infrastructure such as</p>

Representor	Section	Summary of Comments
		schools which impacts on the rural nature of their site. - The increasing pressure arising from ongoing housing and commercial developments in the area was not only having a severe impact on the highway network but was already impacting on the Conservation Area when it was last assessed in 2008. This background information is particularly relevant when considering whether the emerging Local Plan, particularly in respect of Mill Hill, is sound.
Oakfield House, Burtonhole Lane, Mill Hill	General	<p>NPPF 2021, against which this emerging Plan will be assessed, including, as stated at para 16 b) that they be positively prepared in a way that is aspirational but deliverable. The Strategic Transport Assessment that sits behind the emerging Local Plan is based on the Regulation 18 version of the Plan. Since then, numbers on sites have changed, accordingly, this evidence base is out of date and should be updated to reflect the Draft Local Plan Regulation 19 version. The Assessment at para 3.2 also acknowledges the new TfL model suite MoTION but proceeds to use out of date modelling. Further, whilst focusing on active travel, which is understood, at para 6.1 it suggests that as a result of the traffic forecasts being pre-Covid, the actual traffic levels will be lower than those forecast. Certainly, this is not seen elsewhere in the Country where Local Highway Authorities are seeing traffic levels return to their pre-Covid levels and certainly is not reflective of general traffic movements across Mill Hill. There is no evidence, only assumption, that traffic levels will not return generally to pre-Covid levels and continue to increase as was originally forecast. Covid is being used as an excuse to justify lower traffic forecasts than modelling tends to demonstrate. Whilst it is appreciated that there is only a requirement to produce a Strategic Transport Assessment to support an emerging Local Plan, there is a need to demonstrate that sites are deliverable. Mill Hill is identified as a Growth Area, a greater designation that an area for intensification as it is currently in the adopted Local Plan, however, there is no supporting assessment at a more localised level that will ensure this growth can actually be accommodated on the already strained road network and without having further detrimental affects on the Conservation Area. Of greatest concern is the proposed allocation of Site No. 49, Watchtower House and Kingdom Hall. Situated within the Green Belt and Conservation Area and deemed to be within the Mill Hill Growth Area, the site does offer some opportunity for re-development as a result of the site no longer being required for its existing users. It would therefore be classified as 'previously-developed' and development that had no greater impact on the openness of the Green Belt could be forthcoming. However, the proposed site allocation is more than double the size of the area of the site that could be deemed to be 'previously-developed', it is comprised of many trees that are protected and adds value to the history of the Conservation Area. Whilst Policy GSS07 requires any development proposals to consider impacts on the Conservation Area and Green Belt designations, it only seeks to address public transport improvements, not the impact on the highway network or preservation of the protected trees on this site. There is a requirement for a Local Planning Authority to ensure that proposed allocation sites are deliverable and to ensure that policies are sympathetic to local character and history and that developments can add to the overall quality of the area (NPPF Para 130). The site appraisal for Watchtower House is at page 358-359 of the draft Local Plan. It acknowledges that 80% of the site should be retained as Green Belt, but does not address which part of the site, in fact the entire remains within the proposed allocation. It then suggests that only 18% of the overall site is suitable for housing, with a capacity of 224 dwellings (an increase on the Reg18 figure). 18% of the site is 1.17ha. To achieve 224 dwellings on this site a density of 191.5dph would need to be achieved, whilst also avoiding TPO trees and having regard to the character of the Conservation Area. Where is the evidence base to demonstrate that this scale of development is deliverable on this site, without further undermining the character of the Conservation Area by virtue of the scale of development and transport impact. Whilst the ability to construct some residential development on the previously-developed element of the site is accepted, the Council has not published any evidence to demonstrate how the strategy to development on Site 49 to the extent proposed is the most appropriate strategy, furthermore the upgrading of Mill Hill to a growth area has not been justified. There is a distinct lack of evidence to demonstrate that this proposed strategy is the most appropriate and that there are no other alternatives available that will not result in significant detrimental and irrevocable harm to this heritage asset. Such that the site allocation is not justified. The site has not been demonstrated to be deliverable particularly for the quantum of development proposed. Cumulatively this results in the Plan being unsound. In order to overcome this objection, the following would need to occur:</p> <ul style="list-style-type: none"> - Strategic Transport Assessment looking at the impact of development on Mill Hill as a growth area. To satisfy residents that the impact on the highway network will not continue to deteriorate and result in highway safety issues as a result of further excessive on street parking or significant traffic growth. - Reduce the Watertower House site down to the developable area only. - Review the site in some detail (high level masterplan) to demonstrate that 224 dwellings can be accommodated without impacting on the Conservation Area and Protected Trees.
Historic England	General	Thank you for the opportunity to comment on the above consultation document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process. Our comments are made in the context of the principles relating to the historic environment and local plans within the NPPF (NPPF) and the accompanying Planning Practice Guide (PPG). Historic England notes and welcomes the many of the amendments introduced in this draft of the local plan. In particular, we consider the new references to the historic environment both within the vision, themes and objectives section (at para 3.2.2 and Table 2) and policy BSS01 Spatial Strategy to be important. These help demonstrate the Council's and the Plan's

Representor	Section	Summary of Comments
		commitment to both a positive strategy for the historic environment as per the NPPF para 20 and successfully achieving its conservation and enhancement. Nevertheless, there remain some areas where we believe the draft Plan continues to fail to reflect the requirements of national and regional planning policy.
Barnet VCS Environmental Network.	General	The plan is predicated on an increase of over 50,000 people in the borough in the next 15 years. In a time of Climate Emergency, it is vital that not only should the impacts of this population increase be mitigated and addressed through built environment policy but that our open space and wildlife must be protected, increased, improved and nurtured. The current plan is unsound in this respect. Current policy does not plan adequately for the impacts that this population and development increase will have on the open and natural environment. The evidence to support stronger policy is clear and but has not been fully and properly addressed. We propose the following changes should be made to begin to address these impacts.
Comer Homes Group	General	These representations set out our support that the allocation of the NLBP site has been updated since the Regulation 18 version of the Local Plan was published, however does highlight continued concerns with the draft policies of the Regulation 19 version as currently drafted. In summary, Comer Homes welcome that the allocation of their site has been updated to take account of the 2020 planning permission for 1,350 homes up to 9 storeys in height (herein referred to as the "2020 permission"). However, Policy CDH04 relating to tall buildings as currently drafted, does not represent a sound Local Plan by virtue of it not being positively prepared, justified or effective and is inconsistent with the NPPF (2021). The omission of the NLBP site from Policy CDH04 is also inconsistent with the London Plan Policy D9 which sets out an expectation for Boroughs to determine if there are locations where tall buildings may be an appropriate form of development, particularly when the SoS has already deemed it an 'appropriate' site. The Council's position towards tall buildings on the NLBP site which is reflected in the wording of Policy CDH04 is not based on up-to-date or relevant evidence and does not give appropriate weight to the SoS's decision to grant 1,350 homes up to 9 storeys (defined as tall buildings by LB Barnet) on the site. This will have negative impacts on Comer Homes' aspirations for further intensification of the site for redevelopment which is not to the benefit of creating sustainable development and goes against the objectives of plan-making as set out in national policy. These elements, which are expanded on below, must be reviewed prior to submission of the draft Local Plan for examination to ensure the SoS decision is fully recognised, to allow the site capacity to be optimised, and for the Plan to be sound. We have had initial discussions with LB Barnet on these matters but the wording of the Reg 19 version of the Local Plan demonstrates that our concerns have not been taken on board to date and the Local Plan currently does not pass the tests of soundness.
LB Enfield	General	Close cooperation with LB Barnet has been well established between the two councils for many years. Discussions to address specific cross boundary issues arising from the LB Enfield Regulation 18 consultation have been undertaken from mid 2017 onwards. At the Duty to Cooperate (DtC) meeting held with officers on 28 July 2021, the discussion focussed on several strategic matters, including a greater understanding of cross-borough transformational growth and regeneration potential. LB Enfield welcomes ongoing discussions regarding cross boundary matters with LB Barnet as some of the strategic matters relate to housing growth, infrastructure provision and finally place making around the New Southgate area, where both authorities have 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. In summary, I feel there are no strategic cross-boundary matters of concern for Enfield Council. There are several positives related to sub-regional orbital outer London transport and active travel connectivity, the regeneration potential at New Southgate aligned with the New London Plan Opportunity Areas designation and a new Regional Park designation in the Brent Valley and Barnet Plateau. However, LB Enfield would welcome stronger links between the eastern parts of the Barnet area to Enfield, especially in terms of creating better connections through the enhancements of east-west connectivity particularly around walking, cycling and public transport to enable Enfield's residents to benefit from the regeneration associated at New Barnet and New Southgate. LB Enfield looks forward to continuing to work with the LB Barnet to deliver improved connectivity and public realm improvements. I hope the above comments serve to assist in moving the Barnet Local Plan forward. From Enfield's perspective we look forward to continuing cross-boundary development conversations particularly regarding housing growth, infrastructure planning and town centres that both authorities are progressing beyond Local Plan preparation and adoption. Finally, as mentioned by officers at your meeting in July, Enfield Council is undertaking a consultation on the draft New Enfield Local Plan under Regulation 18. The consultation plan has a hybrid nature with strong consultation elements designed to seek people's views on the spatial planning challenges Enfield as a borough faces and the range of policy options being considered. It also contains the council's preferred policy options. Consultation closes on the 13 September 2021 and I look forward to receiving Barnet's response.
Hammerson UK Prop and Aberdeen Standard Investments	General	I write on behalf of Hammerson UK Properties plc and Aberdeen Standard Investments ("H/ASI") to submit representations to the London Borough of Barnet draft Local Plan Regulation 19 consultation. As the Council will be aware H/ASI are the long leaseholders of Brent Cross Shopping Centre, and have been working with the Council over the last 2 decades to facilitate its revitalisation as part of the wider Brent Cross Cricklewood Opportunity Area. H/ASI successfully secured outline planning permission in 2010, a Section 73 permission in 2014, reserved matters approval for the detailed design of Phases 1A North and 1B North, and the local authority promoted compulsory purchase order to enable delivery of these initial phases of the project. Since that point the retail sector has experienced a significant and unprecedented structural change. As a result of the economic uncertainties in the retail market, H/ASI took the decision to delay the delivery of development north of the A406. It was originally hoped that this delay would be temporary whilst the

Representor	Section	Summary of Comments
		<p>market stabilised, however, the changes that have occurred to the retail sector are so significant, partially due to the implications of the COVID 19 pandemic, that it calls into question the appropriateness of a retail led development north of the A406. H/ASI remain committed to enhancing the existing Shopping Centre and redeveloping the surrounding land as part of a new Metropolitan Town Centre, and are evaluating the conceptual changes to the retail market and the role of town centres in the context of Brent Cross. H/ASI would welcome the opportunity to take this work forward in collaboration with the Council. Overall, H/ASI remain supportive of the Council's general approach to development within the Brent Cross Growth Area, however, for the reasons expressed in this representation at present the Local Plan is considered to be technically unsound. H/ASI would welcome the opportunity to discuss these matters in more detail including the selective amendments required to address the soundness tests.</p>
<p>Ballymore Group and TFL Commercial Development</p>	<p>General</p>	<p>Ballymore is a major national and international developer, with considerable experience in delivering sustainable, much sought-after homes and communities. Ballymore is committed to the development of the sites it owns with a multi award-winning portfolio of some of Europe's largest and most transformative urban development projects, for example London City Island (completed) and the Brentford Project (under construction). Ballymore has worked with numerous industry leading partners to develop mixed-use regeneration schemes, creating partnerships with similar ideals has become our core strategy, to create authentic places which all stakeholders are proud of. TfL CD is already working with the Council to deliver mixed-use development and new homes across the borough. All of TfL CD's projects are focussed on delivering optimal, high-quality housing, within schemes that relate to and strengthen their neighbourhoods, which make places that people are proud to live in, and which are founded on transparent engagement and best practice. Ballymore acquired the Broadwalk Shopping Centre in Edgware in 2020 which together with the Forumside sites is subject to a site allocation in the draft local plan with an indicative residential capacity of 2,379 (Site 27). The neighbouring Edgware Stations site is also subject to an allocation with an indicative residential capacity of 2,317 (Site 28). Ballymore and TfL CD are forming a partnership in order to bring the two sites forward concurrently for a comprehensive redevelopment in the heart of the town centre. This joint approach to the delivery of both sites will maximise planning benefits and opportunities for coordinated master-planning and design. In addition to new housing, public realm and commercial floorspace, a fundamental element of the development brief is the provision of new public transport infrastructure including a new bus depot, bus stops and other upgrades. Investment on this scale aligns with the Mayor's transport strategy for London, which in general terms commits TfL to increasing passenger capacity across its network and reducing emissions through a shift to electrification. The significance of Edgware's capacity for growth is reflected in the recently adopted Edgware Growth Area SPD. This identifies the shopping centre and stations as the largest site with high development potential in the town centre where both the SPD and the emerging Local Plan set out a target for 5,000 new homes. The Local Plan seeks to shape growth and change in Barnet over the next 15 years as the borough seeks to meet a pressing need for new housing and recover from the effects of the global pandemic. We are looking forward to continuing to work with the Council to realise these growth ambitions, particularly in Edgware. In that vein, we have undertaken a review of the draft Local Plan and our individual comments on a number of policies are set out below.</p>
<p>DTZ Investors UK Ltd</p>	<p>General</p>	<p>DTZ are appointed to manage Friern Bridge Retail Park on behalf of the owners, Strathclyde Pension Fund. These representations are submitted in respect of Friern Bridge Retail Park on Pegasus Way (herein "the Site").</p> <p>The Site is a well-established retail park of approximately 12 acres (4.8 hectares) in size, which has been operating since the early 1990s. The Site accommodates 12no units that provide approximately 16,500sqm (c178,000 sqft) of retail floorspace. Current operators include B&Q, Sports Direct, London Furniture, Halfords, Furniture Village, Carpetright, Pets at Home, Smyths Toys, Currys PC World and Dunelm, as well as McDonald's, Subway and Costa Coffee. It is served by 600 car parking spaces and servicing access is provided to the rear of each unit. The Site is located on the eastern boundary of Barnet, within the New Southgate Opportunity Area, as designated in the Draft Local Plan. The Site has direct access onto the A406 (North Circular) via Pegasus Way, making it very well connected to the surrounding road network. It is well connected by public transport, with New Southgate station approximately 100m to the north and frequent bus services from bus stops located on the A406, approximately 100m to the south. It is also well connected for pedestrians, with footpaths leading into the site from an area of public open space to the west, and from the residential area to the north. The owners intend to continue managing the Site as a successful retail destination. However, the retail sector is especially dynamic and needs to respond swiftly to the changing demands of consumers and the operational requirements of retailers. We anticipate various changes and developments will therefore be needed over the coming years to keep this destination vibrant and relevant to the requirements of modern city retailing. Whilst an excellent retail destination, the site is large, well-located, highly accessible and therefore suitable for redevelopment for a number of alternative uses. In particular, it is likely to work well for distribution and logistics uses. The proximity to public transport would also make it suitable for high density residential use. As such, these representations are submitted in respect of draft retail policies associated with the Site's current use, but also highlighting the potential of the Site's suitability for redevelopment for logistics or residential in the future. Our suggested amendments seek to ensure that the plan is positively prepared, justified, effective and consistent with national policy and we trust that they will be taken into account during the preparation of the Barnet Draft Local Plan (Reg 19) 2021 to 2036.</p>

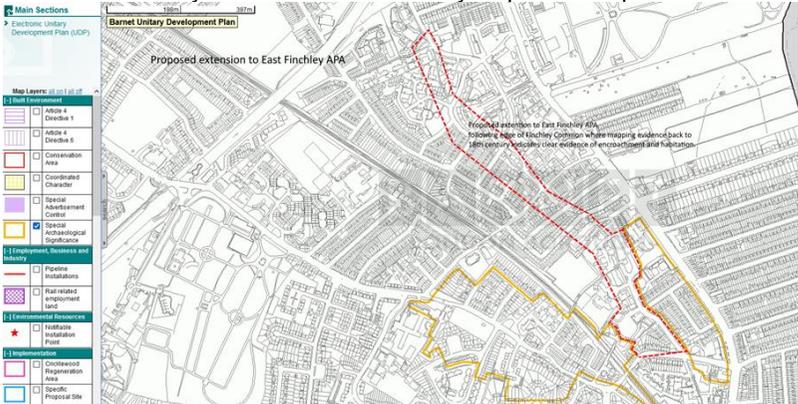
Representor	Section	Summary of Comments
Whetstone Properties Ltd	General	<p>These Representations are submitted on behalf of Whetstone Properties Limited (WPL) who are the promoters of the site known as “<i>Land to the south of Barnet Road and east and west of Glebe Lane</i>”, hereinafter referred to as ‘the site’. In response to the London Borough of Barnet Draft Local Plan (Regulation 18) Preferred Approach Consultation, Simply Planning Limited submitted a detailed representation to the public consultation to outline how we considered that the preferred approach could not be considered sound or in accordance with the NPPF. The full details of this representation will not be repeated in this submission, but a copy of our regulation 18 consultation response is provided as Document 1. A brief summary of our previous representations are as follows: • The draft Local Plan fails to use the Standard Methodology to establish the Borough’s housing need for the next plan period, or provide any exceptional circumstance to justify an alternative approach; • The plan fails to demonstrate a five year land supply for housing that are available and deliverable to meet the Council’s stated housing need within the draft Local Plan; • The Council has failed to properly assess whether the tests under the NPPF are met for a release of Green Beltland to be accepted, in order to meet its required housing need.</p> <p>In the Council’s ‘Local Plan Regulation 18 Town and Country Planning (Local Planning) (England) Regulations - Schedule of Representations and Responses - June 2021’ they provided the following comments in relation to our previous representations.</p>
Diocese of London	General	<p>These representations are produced on behalf of the Diocese of London and seek to demonstrate how the release of the site can assist the London Borough of Barnet in achieving one of its key principles of increasing housing supply and key objective of delivering social infrastructure to support this growth. This can be delivered through a mixed use cross-subsidy approach as highlighted earlier in this document. We consider that the site is a broadly sustainable option for the delivery of housing and educational facilities and therefore the Council should consider its release from the Green Belt through this Local Plan cycle. In comparison to brownfield sites, Green Belt sites are considered deliverable in the short term, rarely have problems with contamination, can provide infrastructure on site if needed, and can also provide high quality, landscaped environments. The Council should therefore strongly consider releasing this area of land to accommodate these uses throughout the plan period, whereby the LDF’s landholding is suitable, available and achievable.</p>
Barratt London	General	<p>Previous representations have provided information about Barratt London and their recent investment in Barnet. To summarise:• Barratt London is a market-leading residential developer with nearly 40 years’ experience delivering high-quality homes in the capital. Barratt London have an extensive portfolio of developments across London. • Barratt London has made a major contribution to the delivery of new high-quality homes and investment in Barnet. Recently Barratt London has invested significantly in the regeneration of Stonegrove and Spur Road Estate known as Evolution in the north of the Borough. It has also created a new residential setting for the Welsh Harp known as Hendon Waterside, delivering new homes, community facilities and a new waterside park. Barratt London has committed to delivering at least 3,752 homes for the Borough of which 1,471 are affordable homes. Barratt London recognises the ambitions of Barnet, and wishes to work with the authority to deliver the following recognised objectives (summarised) for the Borough, as set out within the Regulation 19 Plan: • To respond and recover from the impact of COVID 19 • 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. • To improve connectivity and sustainable travel options. • To conserve and enhance the distinctive character and identity of Barnet’s town centres and suburbs. • To support strong and cohesive communities and promote healthy living and wellbeing. • To deliver an environmentally sustainable Borough. • To ensure new development is high quality, sustainable, and capable of adaption to meet the needs of residents over their lifetime. Barratt London can help achieve these objectives. 2 Conformity with the London Plan and National Planning Policy</p> <p>Barratt London are generally supportive of the Regulation 19 Plan, notably in seeking efficient use of previously developed land to meet boroughs needs as well as 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. However owing to the existing policy direction within National Policy and adopted London Plan, we comment on a number of policies within the Regulation 19 Plan to ensure that they are sound, and in particular that they are flexible, effective and consistent with national policy.</p>
Barnet Climate Action Group	General	<p>Barnet Climate Action Group (BCAG) is made up of concerned residents in the London Borough of Barnet from across faith, cultural, environmental & political organisations, wanting to take action tackling our current climate emergency. BCAG has met monthly since May 2019 at St Mary’s Church Finchley to explore opportunities for reducing greenhouse gas emissions and wider environmental action in the borough of Barnet. Since lockdown meetings have gone online and have been well-attended covering issues such as Decarbonising Transport in the Suburbs, Net Zero Finchley, Nudging Barnet: Behaviour Change and the Climate Emergency, Barnet’s Future Waste, and a briefing on the forthcoming COP26. BCAG is currently working on a Climate Action Plan for Barnet. Details of our events and other activities can be found at www.barnetclimate.org.uk Comments BCAG welcomes the new Barnet Draft Local Plan as a step forward in addressing climate change and is largely supportive of the proposals set out within the document. BCAG also welcomes the opportunity that has been afforded local residents and stakeholders to input into the Barnet Draft Local Plan, however, BCAG is concerned over the relatively short period of consultation time given over for response (close to half of which is during holiday-time for many people) on what is a major strategy document for the borough. BCAG does not believe that the Barnet Draft Local Plan goes far enough in tackling climate change. The challenge of reducing carbon emissions of</p>

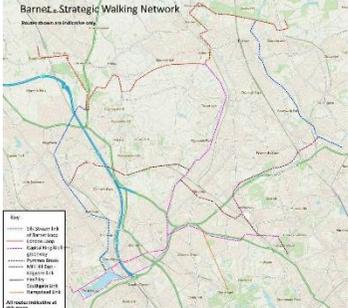
Representor	Section	Summary of Comments
		<p>new build – and opportunities to use new build to reduce emissions of nearby existing buildings though the use of heat networks/decentralised energy options - across the borough are not fully addressed in the Local Plan. While the Barnet Draft Local Plan is stronger on adaptation measures, BCAG believe there is more that needs to be done to protect the borough's communities and infrastructure from the impacts of climate change. Barnet is clearly striving to ensure that it's planning policies and approach are in line with the minimum required of it under the London Plan, however it does not go beyond or seek to go beyond the London Plan's requirements and address climate related requirements that are specific to Barnet. BCAG welcomes the commitment to develop a Sustainable Design Guidance Supplementary Planning Document and hopes that more detail on how developments can reduce carbon emissions and prepare for the impacts of climate change will be provided here. Likewise, BCAG hopes that the Green Infrastructure Supplementary Planning Document will be renewed soon to further emphasise the policy objectives set out in the Barnet Draft Local Plan. A clear timescale for the production of both of these documents should be set out as soon as possible. In addition, there will be a need to rigorously enforce the requirements that are set out in the Barnet Draft Local Plan, so that developers are not able to exploit the 'get-out' clauses that are within the policies set out.</p>
Sports England	General	<p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in developing their evidence base for sport. Sport England aims to ensure positive planning for sport by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need for all levels of sport and for all sectors of the community. To achieve this aim our planning objectives are to PROTECT sports facilities from loss as a result of redevelopment, ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose and meet demands for participation now and in the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found via the following link: https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/ Sport England has reviewed the draft in light of these planning objectives and national planning policy set out in the NPPF (NPPF) and does not consider that the draft complies with this policy framework. Sport England therefore does not consider the draft Local Plan policies are sound and objects to the draft. These objections, and some other comments, relating to the document are detailed out below:</p>
Brent Cross South Limited Partnership ('BXS LP'),	General	<p>On behalf of our client, Brent Cross South Limited Partnership (hereafter 'BXS LP'), we are writing to submit representations on the Barnet Draft Local Plan (Regulation 19 version) published on 28 June 2021 and associated evidence base documents, particularly the Barnet Local Plan Viability Study (May 2021), West London Alliance Workspace Study (April 2021), Strategic Transport Assessment (June 2021), Car Parking Study and Car Parking Standards Review (June 2021). BXS LP is bringing forward the comprehensive development of Brent Cross Town (formerly referred to as 'Brent Cross South') within the Brent Cross Growth Area as identified and allocated within the Draft Local Plan and pursuant to outline planning permission reference F/04687/13 (hereafter referred to as 'the outline planning permission' or 'outline consent'). BXS LP welcomes the opportunity to comment on the Draft Local Plan as a key stakeholder within the Borough, particularly given the importance of Brent Cross Town to meeting the objectives and policies in the Plan, including the ambitious housing delivery targets set out in Chapter 4. We are pleased to note that many of the comments set out in our representations to the Regulation 18 version of the Plan have been considered and are reflected in the Regulation 19 draft.</p> <p>BXS LP continues to support the policy objectives of the Draft Local Plan, and welcomes the importance attached to realising the comprehensive development of the Brent Cross Growth Area, which is capable of delivering very significant regeneration benefits and making a substantial contribution to Borough targets for new homes and jobs. In general, BXS LP considers that the Plan has been well considered and positively prepared. However, in our considered opinion there remain some key areas where the Plan may not be justified, effective, deliverable or consistent with national or London Plan policy. Detailed comments, by chapter and para, are set out in the schedule on page 6 of this submission, along with our recommendations. Comments have also been provided by Steer, on behalf of BXS LP, in relation to Chapter 11 (along with the Strategic Transport Assessment, Car Parking Study and Car Parking Standards Review). These representations have been enclosed with this letter. Our comments mostly fall into one of five areas of concern, outlined below.</p>
Mays Lane Gospel Hall Trust	General	<p>Mays Lane Gospel Hall Trust (MLGHT) own the freehold of 310 Mays Lane and previously made representations to the Regulation 18 version of the Local Plan Review in March 2020. This previous letter of representation is attached for reference given that the arguments remain the same, and was prepared on two grounds: (i) Requesting that LB Barnet corrected the boundaries of the Green Belt as had been done in some other instances to reflect the existing urban character of the eastern third of the site which comprises an existing 5,000 sqm building. (ii) That LB Barnet should consider greater Green Belt release more generally to deliver housing given their housing need, historic under delivery and over-reliance of a number of sites that are unlikely to be brought forward in the early stages of the Plan period. It is evident from the release of the Regulation 19 version Local Plan and the schedule of representations presented to the Policy & Resources Committee in June 2021 that LB Barnet have not made any meaningful revisions to the latest draft of the Plan or reconsidered their approach to Green Belt release. In the schedule of representations, the Council have noted that 310 Mays Lane was not highlighted as a potential minor Green Belt adjustment in the study and that their 2018 Green Belt review demonstrates no justification for making significant revisions to existing Green Belt</p>

Representor	Section	Summary of Comments
		and MOL boundaries. Whilst in respect of housing need across the Borough, they suggest they have capacity to deliver a minimum of 35,460 new homes from 2021 to 2036. The Council have confirmed that the Regulation 19 version Local Plan that they have submitted for consultation will be the version that is subsequently submitted to the Inspectorate for Examination. We therefore wish to reinforce our representations made on behalf of the Trust at Regulation 18 stage ahead of any future Examination in Public.
Barnet Labour Group	General	The Labour Group voted against the draft Local Plan at Committee. The document has some merit in places, but lacks ambition on climate change, protection of green space, and protection of the Borough against mass overdevelopment. We agree with many of the comments made by the Barnet Green Spaces Network in their submission, and we largely agree with the Barnet Society submission made earlier this year (both attached). Our main objections to the draft Local Plan are below, although these are not exhaustive.
Berkeley Group (on behalf on St James Group Limited/St William Homes LLP	General	. It should be noted that these representations are made solely on behalf of St William, notwithstanding any representations made by other divisions of the Berkeley Group or National Grid. As part of the Berkeley Group, St William focuses on transforming sites into exceptional places where sustainable communities thrive and create homes and neighbourhoods on this basis. We therefore support the Council's overarching themes and objectives of the draft Local Plan, particularly those that emphasise high quality homes and placemaking.
Barnet Green Spaces Network	General	NPPF para 22 was recently amended " <i>to encourage local authorities to employ long-term thinking in developing their local plan visions, where appropriate, to enable sustainable development. These proposals for a long-term vision for new settlements and major urban extensions were welcomed, and our consultation response set out that the Government would consider whether further clarification might be required in guidance to clarify the evidence base needed to support a 30-year vision</i> ". (Letter Robert Jenrick (SoS) to CEO Planning Inspectorate 2 nd August 2021) Even if it is argued that this does not strictly apply to the Barnet Local plan, at this stage -although there is a debate to be had on that point - the existing 10-15 year strategy is not fit for purpose as it lacks ambition in order to deal with the very serious issues confronting us and in particular climate change and biodiversity loss. The overall strategy needs rethinking and indeed a 30 year horizon would be more appropriate in Barnet given the significant housing and population increases being promoted. COVID related changes to behaviour are not yet fully understood. Clearer trends may be apparent by the time of the Examination and initial responses may need to be debated on that score as well. Please see attached paper for a list of changes proposed to make the plan sound in strategic terms. The current strategy of Barnet appears to dwell almost entirely on the housing numbers debate. It is not about creating sustainable communities but largely about creating large flatted housing estates. It lacks imagination and ambition on tackling major issues such as Climate change, environmental improvements to the Barnet landscape and generally improving the lives of all residents. This needs to be addressed through debate at examination.
Barnet Green Spaces Network	General	We would strongly encourage the Local Plan to be more ambitious. It is good to see environmental elements in lots of the plan but they are safe and low to mid level. The plan appears quite old fashioned and there is a real opportunity for it to be bolder and more ambitious. The council should be competitively ambitious. Perhaps this should be done with a little carrot and stick! Stick – where is the risk register for Climate Change We see mention of flooding but less about buildings less able to cope with heat for example, storm damage, energy outages.... There are huge risks that should be included more comprehensively. Carrot – being opportunity to access investment, win awards, attract funding, green jobs – and actually transform the borough in the process of course! The borough needs to become a beacon / leading example of green action. Some top line suggestions: <ul style="list-style-type: none"> ➤ Linked to the Country/ London's announcement Barnet should declare a climate emergency – this should be front and centre (as Covid is in places) and frame the new policies around this ➤ Ambition to become London's most green borough <i>recognising it's not just the right thing to do for the environment but also for families, children, the heritage, appearance, budget and future of the borough</i>. Ideally push this even higher – UK's Greenest Council / Leading European Council Bigger targets are required in the document – that will serve the borough well not just from an eco perspective but also in order to attract future Prizes/ Investment – e.g. <ul style="list-style-type: none"> ➤ Doubling Tree Canopy ➤ Doubling Wildlife ➤ Becoming litter free ➤ Being Carbon neutral by 2030 – aiming for zero carbon homes ➤ Sourcing all energy from renewables

Representor	Section	Summary of Comments
		<ul style="list-style-type: none"> ➤ Add to B lines / Increasing Wildlife Corridors – esp in respect to new developments – ensuring that wildlife corridors are kept / increased in face of new development ➤ Wise to include a school target as many schools want to do more – so could be a good extra win
TfL (Spatial Planning)	General	<p>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development to reflect TfL's interests as a landowner and potential developer. As you are aware, the London Plan 2021 has just been published and now forms part of the Development Plan. We strongly welcome your aspiration to 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 and achieve mode split targets, 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 you on the considerable progress you have made in developing car parking standards that will make growth in the borough more sustainable, taking into account the extent of alternatives in different locations. As a result, the parking standards are now in conformity with the London Plan 2021. We do however have concerns that some of the accompanying policy text and site allocations need to be updated to reflect the approach to parking. In particular, references to parking 'requirements' or 'needs' should be further qualified and related only to disabled persons parking and operational parking. Although the reliance on assessing orbital travel has been modified slightly, we continue to have concerns about using a connectivity measure that could be open to challenge or used inappropriately. We would like to see the need to measure orbital travel when considering parking requirements removed entirely. We welcome your support for delivering improved public transport capacity and infrastructure in the borough including protection of transport land and where there are opportunities to do so, contributions towards provision of step-free access and capacity enhancement. We also welcome your support for the West London Orbital rail scheme, which will improve public transport connectivity within Barnet and to neighbouring boroughs. However, it may be prudent to adopt more cautious wording about its delivery to reflect the fact that the scheme remains unfunded at the present time. 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 given to Crossrail 2 and the major benefits the scheme could bring to Barnet and to New Southgate in particular. We strongly welcome your 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 you 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 the 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.</p>
Pinkham Way Alliance	General	<p>1. Pinkham Way Alliance (PWA) is a community campaign group which came together in early 2011 when residents living in the surrounding area of the Pinkham Way site became concerned about plans by the North London Waste Authority (NLWA) and Barnet Council to develop the site for a large scale MBT waste facility and waste vehicle depot respectively. Since then, PWA, which has some 2,700 supporters, has taken an active interest in and has participated in the preparation of both Submission versions of the North London Waste Plan, the Haringey Local Plan: Strategic Policies document and the Haringey Site Allocations DPD, having made representations to and appeared at the examinations in public of all those plans. PWA confirms that it intends to participate in the Examination in Public of Barnet's Local Plan 2021-2036.</p>
Hertfordshire County Council	General	<p>General Commentary (HCC highways) The growth that is proposed in the LBB Regulation 19 Draft Local Plan has been accounted for in HCC's transport modelling and transport work. HCC as highway Authority undertake annual modelling work to understand the impacts of development to the Hertfordshire transport network. This work also includes and accounts for growth beyond Hertfordshire, utilising government growth numbers and planning data to account for new development of residential and employment. Our method also includes a buffer zone around Hertfordshire where more detailed growth and settlement inputs are accounted for to best understand the impacts to Hertfordshire. In its role as highways authority, HCC supports the local plan's approach to transport matters. The direction of growth to the most sustainable locations with good transport and active travel choices is endorsed by HCC. HCC's own Local Transport Plan seeks to support a similar ambition within Hertfordshire by supporting the creation of built environments that will encourage greater use of sustainable transport modes, and ultimately promote a shift away from use of the private car. Whilst HCC supports, in principle, LBB's growth strategy as it relates to transport matters there are growth areas that will be of interest to HCC as development proposals progress. Should the detailed planning applications, and associating transport assessments, relating to development sites identify impacts to HCC's transport network we would request early engagement on such matters and the opportunity to work collaboratively with interested parties to identify appropriate mitigations and solutions.</p>

Representor	Section	Summary of Comments
Canal & River Trust	General – Welsh Harp Reservoir	<p>The Trust is a statutory consultee in the Development Management process. The Trust owns and manages the Brent Reservoir (Welsh Harp) and the Silk Stream (only between the reservoir and the A5) within the LB Barnet. Our waterways do, or have the potential to, provide important areas for recreation, biodiversity, sustainable active transport (with related health and air quality benefit), business, tourism, a focal point for cultural activities, and they are heritage assets. Waterways can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. The Welsh Harp, or Brent Reservoir, is owned and managed by the Trust. You will be aware that the reservoir falls within the administrative boundaries of both LB Barnet (to the north) and LB Brent (southern section). The reservoir is designated a Site of Special Scientific Interest and is a very important over wintering location for birds, as well as for other biodiversity. The Trust has the following comments to make on the draft Local Plan: The Welsh Harp (Brent Reservoir) is a key focus area for the Trust, and we are continuing to work on interpretation, waymarking and improved access to the reservoir to enhance the visitor experience. We know that access to water supports the wellbeing of visitors to our waterway network (see Simetrica, Assessing the wellbeing impacts of waterways usage in England and Wales). We believe that by improving the quality of the visitor experience, alongside environmental quality, the reservoir can further support wellbeing (including mental and physical health) within Brent, Barnet and the wider area. concern over debris/litter, siltation and the general environment condition. To address this, a consultation with the various stakeholders is being held to develop a comprehensive management plan. £100k obtained also be used to develop a pilot project that aims to create new wetland habitat for birds. The current bird rafts on the reservoir are over 30 years old. The plan is to replace them and put in new rafts that can attract birds, consistent with an ambition to improve the SSSI status. In addition, the story of the reservoir from its early 19th-century origins has an important role to play in public engagement and the promotion of the site as a visitor attraction. Securing a circular route around the reservoir would require overcoming constraints that are chiefly located in the LB of Brent, yet such a key achievement would also benefit the LB of Barnet's connectivity vision. We suggest that this should be identified as an aspiration within the Local Plan. The Trust are supportive of the activities and involvement of other groups on the reservoir, including those from the West Hendon redevelopment. We believe there are improvements that can be made on working together, and this is understood and recognised by other parties, such as the Environment Agency, Natural England and the London Wildlife Trust. It should be noted, however, that the Trust are required to follow a specific process when permitting third parties to carry out work at the reservoir, under Section 28I of the Wildlife & Countryside Act.</p>
LB Brent	Statement of Common Ground	<p>The Council is looking forward to joint-working with LB Barnet on strategic matters. This has been highlighted in various section of the draft Plan. The Council feels it will be helpful to list those and looks forward to engaging with LB Barnet.</p> <ul style="list-style-type: none"> • Regeneration proposals for West Hendon and any future documents relating to the Brent Reservoir and strategies for the adjoining open spaces including West Hendon Playing Fields and Woodfield Park Sports Ground. No reference made. • Brent Cross West (Thameslink): The 24-hour pedestrian link across the railway lines and other potential improved pedestrian routes between it and the A5 Edgware Road which will open up access to neighbourhoods in LB Brent to the west. Reference made in para 4.13.1. • GSS03 Brent Cross West Growth Area - 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 will seek joint-working to develop plans for growth in cooperation with Brent Council and ensure that a coordinated masterplan for the area is prepared planning framework for this area potentially through an Area Action Plan or Supplementary Planning Document. Reference made in Policy GSS03. • GSS04 Cricklewood Growth Area - The Council will seek to be engaged at the preparation stage of the planning framework for this area with LB Brent/LB Camden/LB Barnet. • 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. Reference made in para 4.16.8. • Agree a scheme with TfL/ LB Barnet/ LB Brent for improving the junction between the A406 and the A5 at Staples Corner. The existing strategic highway network in the area is already congested with the junction 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. Reference made in para 4.16.7. • GSS06 Colindale Growth Area - Colindale town centre is Brent's priority town centres and falls within LB Brent and LB Barnet. Ensure that LB Brent are informed of any intention in future to produce new area planning frameworks affecting Colindale. • GSS08 Barnet's District Town Centres - The Council welcomes the identification of Burnt Oak main town centre as a priority location for investment and revitalisation. Ensure engagement with LB Brent/LB Barnet/LB Harrow in any initiative to consider a more co-ordinated way of addressing the future of the town centre as a whole

Representor	Section	Summary of Comments
		<ul style="list-style-type: none"> GSS11 Major Thoroughfares - A5 Watling Road is recognised as a major thoroughfare where parts of it has been identified for tall buildings in LB Brent's Local Plan. The Council would be willing to engage with LB Barnet at appropriate times in the production of the A5 tall buildings study that LB Barnet has indicated that it is looking to progress to ensure a complementary approach to tall buildings along the A5. CDH04 Tall Buildings and Tall Buildings update (supporting document) – The council supports the policy in relation to high quality design. It recognises the identification of the A5 as 'suitable for tall buildings in some sections'. As set out in response to Policy GSS11 it would welcome suitable engagement in further iterations of the strategy for the A5. <p>Protected views - Two protected viewing corridors toward Harrow on the Hill pass through Brent from Barnet. These include views from Millfields Park, and Golders Hill Park. LB Brent and LB Barnet have agreed a statement to establish a common ground on the designation of these corridors. In the statement, it was agreed that while Barnet progresses its Reg 19 Local Plan, it will review the Locally Important Views and the impact they have on our neighbouring boroughs. LB Barnet recognises that given the impact of existing tall buildings on these views, it will be important to assess the potential impact of any proposed tall building. As part of our Duty to Cooperate responsibilities, we look forward to discuss the two views from Golders Hill Park and Mill Field toward Harrow on the Hill to gain further certainty on their direction, extent and harm that development in Brent should seek to avoid.</p>
Roger Chapman HADAS	Area of Special Archaeological Significance (ASAS)	<p>This Area of Special Archaeological Significance (ASAS) [now known as Archaeological Priority Areas APAs) consists of two sections:</p> <p>a) East End (western area): A medieval hamlet is located here, which is believed to have developed in the 14th century. The East End Road was an ancient road connecting the hamlet with the hamlet at Church End.</p> <p>b) Park Gate (eastern area): East End and Park Gate, mentioned respectively in 1365 and 1375 AD, together formed a scattered hamlet where the East End Road met the Great North road. The traditional village centre was located at Market Place, which held a hog market in the 18th century.</p> <p>The attached map shows the two wings of the East Finchley APA. Unfortunately, the mapping evidence and recent excavations all point to the fact that the core part of historic East Finchley – that part which bordered Finchley Common - has been left out. To remedy this situation a new boundary incorporating Market Place and the Walks should be adopted. This will enable us to understand the mediaeval core of the hamlet of East Finchley rather than unwittingly lose it through an incorrectly drawn boundary.</p> <p>Substantial additional mapping and documentary evidence can be submitted to substantiate this boundary change.</p> <p>Add new boundary to APA for East Finchley as per the map below</p>  <p>The extension of the APA will require explanation and examination.</p>
CPRE London	Areas of open space deficiency	<p>Many residential streets have become unplanned car parks but it is possible to create safe, pleasant places for play and recreation simply by closing a street, or part of a street, to traffic and introducing greenery, seating or interest. The 'Grey to Green' movement also helps manage increased extreme rainfall and high temperature events. This type of intervention can be low cost if bollards are used. Then the local community can help with greening or other interest. Housing estates often allocate space to parking unnecessarily or with poor layout and a StreetParks policy can also promote better use of space within housing estates to create space for play, recreation or other amenities like secure cycle parking. We propose the plan includes a new policy to promote the transformation of parts of streets and estates into 'StreetParks' in areas of deficiency of open space / play space / green space.</p>

Representor	Section	Summary of Comments
Roger Chapman Ramblers Herts & North Middlesex	Barnet Strategic Walking Network	
Natural England	Brent Reservoir SSSI	<p>Natural England welcome the changes that have been made to the local plan after our consultation response at Regulation 18. We are pleased to see that the SSSI is now referred to as both Welsh Harp and Brent Reservoir throughout the plan, and that specific wording has been added to Policy ECC06 to reference the protection of the SSSI. We note that the Local Plan identifies the opportunity to improve access to Brent Reservoir through regeneration proposals for West Hendon (10.22.1), and as mentioned in our Regulation 18 response, would suggest that recreational pressures for the Local Plan will need to be considered if more of the site is accessible for public use.</p>
Home Builders Federation	Five Year Housing Land Supply and Housing Trajectory	<p>The Plan is unsound because it is contrary to national policy and negatively prepared. The information provided indicates that the Council may not be able to show a five-year housing land supply. The Council will need to provide a statement of what it considers its housing land supply to be for the next five years. Table 5 indicates that land for housing could be available for 14,250 homes (2021/22-2025/26) but Table 5A indicates that only 4,600 of these are on sites identified. The requirement is for an average of 2,364 net new homes a year. This would require a minimum 11,820 homes over the next five years, plus an allowance made for the appropriate buffer. The Local Plan has not provided a statement of what the buffer will be. We believe it ought to do so, even though we recognise that this is an evolving figure. We understand from Barnet Council's Housing Delivery Action Plan 2020 that it has delivered less than 95% of its requirement for the last three years, and consequently has to produce the action plan to demonstrate how it will correct the situation (NPPF, para 76). It will also need to apply a 10% buffer to the five-year land supply calculation. This indicates a need for 13,640 homes in the first five years on deliverable sites. Table 5 indicates that land for 14,250 homes may be available but Table 5A indicates that only 4,600 homes are on land that has been identified. This could be a weakness for the Local Plan. It will also need to assess whether these 4,600 homes are deliverable.</p>
Brent Cross South Limited Partnership ('BXS LP'),	Freight and Servicing	<p>As stated previously in the representation made in the Reg 18 Draft Local Plan consultation, one of the key transport issues facing transport systems and new development is that of servicing and freight activity. Both the London Plan and Major's Transport Strategy place significant importance on managing freight and servicing. 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 collision 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 and should be support through a specific policy.</p>
Barnet Labour Group	Gambling	<p>The plan is far too weak on restricting casinos and other adult gaming centres in our high streets and town centres and controls need to be significantly stronger. The Planning Inspector appeal decision was clear about this in relation to the Merkur Slots outlet in Finchley Central. The Inspector said: "The Council has raised concerns on the effect of the proposal on the Finchley Town Centre Strategy 2017, particularly the ambition to create 'Finchley Square'. However, little specific detail has been submitted to demonstrate that the proposal would hinder such aspirations being delivered. I have considered this appeal proposal on its own merits and concluded that it would not cause harm for the reasons set out above. " Unless we provide robust policies in the Local Plan and have SPD documents that reinforce these policies, Barnet will see the proliferation of gambling outlets which the Council will be powerless to prevent.</p>
DWD LLP	Garrick Industrial Centre LSIS Boundary	<p>We do not consider the continued inclusion of the Car Showroom site within the Garrick Industrial Centre LSIS is sound as it is not positively prepared or justified for the reasons set out in the above referenced Representations. 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 housing targets. Residential led redevelopment also offers opportunities to improve the public realm and pedestrian and cycling connectivity by the delivery of a new pedestrian bridge across the Silk Stream to connect approximately 2200 dwellings to the north of Silk Stream with Hendon Station. Residential led redevelopment of the Site would also compliment the recently approved residential led redevelopment of the Sainsburys site to the north by providing biodiversity enhancement measures</p>

Representor	Section	Summary of Comments
		<p>along the Silk Stream including restoration and improving accessibility to members of the public in connection with the provision of a new pedestrian bridge. The Sites continued allocation in the Garrick Industrial Centre LSIS would continue to prejudice the residential amenity of existing neighbouring dwellings to the south as well as the recently approved residential dwellings to the north, as well as prejudice the delivery of significantly public realm improvements to Edgware Road, Garrick Road, Silk Stream and improved pedestrian and cycling connectivity across Silk Stream. Our Consultation Representations on the Draft Local Plan (Reg 18) dated March 2020 (Enclosed for reference) set out the reasons why we consider it is appropriate to take the Site out of the current LSIS designation. Our Consultation Representations dated August 2021 offers an alternative approach which would involve a land swap of LSIS land which would increase the amount of LSIS and industrial land in a more appropriate location in the Borough. This would release the Car Showroom site for residential led redevelopment in a highly sustainable location and would also deliver other key Local Plan objectives including the Major Thoroughfare designation, biodiversity improvements to the Silk Stream as well as the pedestrian bridge across Silk Stream. I refer to our detailed consultation response enclosed dated March 2020 and August 2021 for more information.</p>
Natural England	Green Infrastructure	<p>We would advise green infrastructure to be designed in accordance with Natural England Framework of Green Infrastructure Standards, which is to be published in 2021, as well as being in line with the Accessible Natural Green Space Standards (ANGST). Natural England is currently leading national work on a Green Infrastructure Standards project, expected to launch later this year. This will be a vital contribution to delivery of the 25 Year Environment Plan. We will be happy to continue to advise your authority as this work progresses. Additionally, we recommend the Plan outlines the need for securing the long term management of new and existing green infrastructure (GI) and for protecting it from future development. Options could include the use of conservation covenant agreements, LNR declaration, Fields in Trust designation, green space designation in neighbourhood plans or Town and Village Green registration. Alternatively land can be passed on to a suitable NGO, or to your Council, or a Town or Parish Council. The Local Plan should also reference the following green infrastructure policy standards:</p> <ul style="list-style-type: none"> • Keep Britain Tidy runs the Green Flag Award scheme on behalf of Government. Anyone can apply to have their greenspace assessed against the Green Flag Award Quality standard, for payment of a fee. The Award is adaptable to a range of types of greenspace including parks, gardens, social housing, etc. • The Sensory Trust published 'By All reasonable Means' which sets good practice guidance on providing access to the natural environment for people of all abilities. Although not all areas will be able to provide this (such as some wildlife areas), the aim is to get the majority of areas accessible to all at least in part. • The Forestry Commission has developed guidelines for Tree canopy cover, to be set for a local area, based on evidence showing that 20% is a good aspiration, depending on the current level. • The Woodland Trust recommend woodland access standards. Accessible woodland of at least 2 ha should be available with 500 m of new homes and woodland of at least 20 ha within 4 km. <p>The plan should ensure new green infrastructure and habitat creation is monitored to ensure that it develops in accordance with its stated intention. New development located in easy walking distance from existing natural greenspace and publicly accessible nature reserves will benefit substantially by the presence of such facilities in the locality and will through an increase in visitors, inevitably increase ongoing visitor management costs. Where the management of the green infrastructure is not already secured, local plan policy should require development to make a financial contribution appropriate to the scale of the development to the managers of the reserve / greenspace to cover these additional costs. This is particularly important where the nature reserves, or nature parks, are run by charities that do not have secured income to cover the in perpetuity management costs associated with new housing development. The Plan should commit the authority to developing a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (as required by NPPF para 171). This should include detailed requirements for new areas of green infrastructure along with a review of existing to ensure that they are meeting the multifunctional benefits and thereby maximising their Natural Capital.</p>
Danielle Pollastri	Housing	<p>The ONS suggests that a million people have left the country at the end of 2020 with more recent reports showing 700,000 of these having left London. Brexit has been a predictable contributor to an exodus of mainly European "Londoners". People are not living longer. Covid-19 is with us for the foreseeable future and will be picking off people throughout the year. There will be inevitable variants and mutations. Concentrations of people in high rise buildings will only facilitate these. Another consideration, is the assumed affordability of these properties to those who will buy and live in them. Permanent jobs are on the decrease in London and mortgages are seldom offered to those in temporary, contract work or the self employed. Who will buy them? No doubt those living overseas who wish to "invest" their cash where their own governments can't tax it. This means foreign landlords renting out properties to people to live and work here. Is this what the residents of Cricklewood want or need?</p>
GLA – Planning	Housing	<p>The draft local plan commits the borough to meet the London Plan's 10-year housing target of 2,364 homes per year. These will be concentrated in the borough's Opportunity Areas, Growth Areas and District Town Centres, and this is welcomed. The draft plan sets out a delivery target of 5,100 homes on</p>

Representor	Section	Summary of Comments
		<p>small sites by 2036. This equates to 340 homes per year, below the London Plan 2021 target of 434. The intention to prepare a specific Design Code for Small Sites as part of the Sustainable Design Guidance SPD is supported. In the interim the borough should refer to the GLA's draft Good Quality Homes for All Londoners LPG and specifically Module B on small sites. The draft plan should mention the 50% affordable housing threshold for public sector land and loss of industrial land or reference the relevant London Plan policies, as these affordability levels could potentially be viable. This would also be useful, as some explanations within the draft plan lack clarity without such references. Para 5.4.10 also appears to be inconsistent with LP2021 Policy H5 C in that all the criteria must be met to follow the Fast Track Route. The West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2018) found no current or future need in Barnet for pitches and plots, and the Council has confirmed that it will work with the Mayor on the London-wide Gypsy and Traveller accommodation needs assessment. In the interim the borough should work with adjoining boroughs to consider if sites in Barnet could contribute to meeting their identified needs.</p>
Whetstone Properties Ltd	Housing Need	<p>In our previous regulation 18 consultation response, we highlighted that the regulation 18 draft Local Plan identified that the standard methodology for the London Borough of Barnet would mean a housing requirement of 4,126 dwellings per annum, giving a requirement of 62,000 dwellings during the plan period to 2036. However, since this time the government has amended the standard methodology to require the 20 largest cities within England to have a 35% uplift to their housing need. As such, the Council's identified housing need using the standard methodology with a 35% uplift would equate to 5,361 dwellings per annum, which is now a requirement of 80,415 dwellings during the plan period to 2036. As outlined above, the Council have responded to our previous regulation 18 representation to advise that the draft Local Plan has been updated to have a housing figure of 35,460 dwellings over the course of the plan period. This figure is the housing requirement which has been included in the 2021 version of the London Plan. The Council's response notes the guidance at para: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance, which states as follows: "<i>Where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategic or non-strategic policies.</i>" The above is noted and is a material consideration. However, during the examination and adoption of the London Plan the housing need that was planned for was a significant issue. The new London Plan was submitted for examination prior to 24th February 2019. Therefore, in accordance with para 214 of the NPPF (2019 version), the London Plan was assessed for soundness under the 2012 version of the NPPF and so was not subject to the requirements of Para 61 of the NPPF (2021 version), which requires the standard methodology to be used to determine local housing need, unless exceptional circumstances apply. The Secretary of State's Letter to the Mayor of London dated 27 July 2018 confirms that the Secretary of State amended footnote 69 of the revised NPPF so that the draft London Plan would be examined against the previous NPPF rather than new national policy. However, this was done on the basis that a review of the London Plan was commenced immediately after adoption, to ensure that it is brought into line with the revised NPPF in relation to house need assessment and the standard methodology. This was also re-iterated as necessary in his letter to the Mayor dated 12th March 2020. Most recently in agreeing to the publication of the London Plan 2021 the Secretary of State (in his letter of 29th January 2021) reiterated the need to commence work on the next London plan so as "<i>to bridge the significant gap between the housing it seeks to develop and the actual acute housing need London faces</i>". The same letter expressly references the Secretary of State's powers to direct review of the latest London Plan, with obvious implications given the past and acknowledged ongoing failure to deliver against London's true housing need. The draft Local Plan falls to be considered under the 2021 version of the NPPF. This national guidance is clear that the standard methodology is required to be used, unless exceptional circumstances are met. Whilst the guidance in the PPG relating to housing need and spatial development strategies are noted, this does not override the requirements for the Local Plan to be tested for soundness against the current version of the NPPF, which is something that was not undertaken or required when the 'spatial development strategy' (i.e the 2021 London Plan) was examined and found sound. It is acknowledged in writing by the London Plan EiP Panel and the Secretary of State that the new London Plan is failing to meet its identified housing need. Therefore, this cannot be considered a sound basis for establishing the housing need in the Local Plan, especially when this is due to be assessed against a different version of the NPPF and one which is explicit that the standard method that should be used to establish housing need. Given the above, we do not consider that the Council's approach to establishing its need is sound and in accordance with the NPPF as the guidance outlined in para: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance, is not an exceptional circumstances which justifies an alternative approach, as it does not reflect current and future demographic trend or market signals and is based on an approach which fails to identify the housing need for London. The standard methodology with the required 35% uplift gives a housing need for LB Barnet of 80,415 dwellings during the plan period to 2036. The draft Local Plan intends to proceed using the London Plan standard of 35,460 dwellings. As such, the plan is currently underproviding by 44,955 dwellings over the course of the plan and will meet well below the housing need identified using the standard methodology. Therefore, we consider that the regulation 19 draft Local Plan cannot be considered sound when assessed against the 2021 version of the NPPF, as it conflicts with para 61 by failing to use the standard methodology to identify its housing need or to provide an exceptional circumstance that would allow it proceed using an alternative approach which that reflects current and future demographic trends and market signals.</p>

Representor	Section	Summary of Comments
Diocese of London	Indoor Sports and Recreation Facilities	<p>i. Indoor Sports and Recreation Facilities We do not consider that the Council's approach to delivering supporting recreational facilities is sound and thus the Local Plan fails the tests of soundness due to it not being based on a robust evidence base. The Council has produced an Indoor Sports and Recreation 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, but no clear strategy for delivery of this is found within the Local Plan. 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: 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. Gymnastics and Trampolining • 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	Local Nature Recovery Strategies	<p>Work is underway within Natural England and with partners on several of the key elements of the Environment Bill, including Nature Recovery Networks and Local Nature Recovery Strategies. It should be noted that the term Nature Recovery Network (NRN) is used to refer to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife. Local Nature Recovery Strategies (LNRs) will be the key mechanism for planning and mapping local delivery of the NRN. LNRs will form a new system of spatial strategies for nature that will be mandated by the Environment Act. They will cover the whole of England and will be developed by Responsible Authorities (RAs) appointed by the Secretary of State, usually at a county scale. Each strategy will:</p> <ul style="list-style-type: none"> • Map the most valuable existing habitat for nature • Map specific proposals for creating or improving habitat for nature and wider environment goals • Agree priorities for nature's recovery <p>It is the government's intention that mandatory biodiversity net gain will provide a financial incentive for development to support the delivery of LNRs through an uplift in the calculation of biodiversity units created at sites identified by the strategy. LNRs have also been designed to help local planning authorities deliver existing policy on conserving and enhancing biodiversity and to reflect this in the land use plans for their area. There are currently 5 LNR pilots; these pilots are testing various aspects of development of LNRs, including their relationship to strategic planning, to inform secondary legislation and statutory guidance. According to the current timetable LNRs should be rolled out in Spring 2022. Given that national guidance on LNRs and their relationship to strategic planning is still in development, we advise that Local Plan policy recognises and references its support to the delivery of the emerging NRN and LNRs covering the area.</p>
DWD LLP	LSIS Substitution	<p>This Consultation Rep has been prepared to support an LSIS land swap in the Draft Local Plan in order to unlock the optimum long term planning use for the Hyde Site and secure the undesignated Retail Park for employment use. As this Consultation Rep demonstrates there would be significant planning policy benefits for the Council in terms of increasing the amount of LSIS and industrial land to reduce the identified deficit to need over the Draft Local Plan period. Releasing the Hyde Site from its designation would also unlock its full development potential which would provide additional housing to meet the Council's ascribed targets in addition to offsetting the loss of the 724 houses which were to be approved on the Retail Park under the withdrawn 2018 Application. In addition, when analysing the existing site contexts for both the Hyde Site and the Retail Park an LSIS land swap is the most logical approach in both instances owing to nearby properties and proximity to transport infrastructure. Therefore in line with the right to provide a consultation response on the Draft Regulation 19 Local Plan under the provisions of Regulation 20 (1) 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 swap the LSIS land designation of the Car Showroom, The Hyde, Edgware Road, London, NW9 6BH with the undesignated Pentavia Retail Park, Watford Way, London, NW7 2ET in the Draft Regulation 19 Local Plan. We would be grateful for an opportunity to discuss these matters further with the Planning Policy Team.</p>
Landsec	NPPF 2021	<p>The Draft Local Plan does not reflect the latest version of the NPPF, published in July 2021, including the revisions made in response to the Building Better Building Beautiful Commission Living with Beauty report. The changes include an expectation that all councils should develop a local design code. It is requested that the Council provide further clarity within the Draft Local Plan on its consistency with the NPPF.</p>
GLA – Planning	Opportunity Areas	<p>The Plan includes specific policies for the Opportunity Areas identified in the London Plan. The Mayor supports Barnet's intention to work with the adjoining boroughs on a planning framework for New Southgate. In order to be consistent with London Plan policy D9, the boundary of any areas in New Southgate</p>

Representor	Section	Summary of Comments
		that are appropriate locations for tall buildings must be set out in a development plan document. The GLA and TfL would be happy to work with the boroughs on scoping a potential planning framework for the area.
Barnet Labour Group	Overdevelopment	The document does not go far enough to protect the Borough from over-intensification, inappropriate density and inappropriate height of new buildings - especially in town centres which in Barnet are suburban in nature. The policies around these issues are not robust enough. Barnet is already seen as a soft touch by developers, and we have seen completely inappropriate planning applications submitted in a large number of locations as a result - Homebase in North Finchley is just one of them. We are extremely concerned about the effect that a weak Local Plan will have for the future of Barnet. The draft Local Plan suggests that super tall buildings of up to 25 storeys will be allowed in some town centre locations - this is unacceptable. Equally, tall buildings of up to 14 storeys in some town centre locations are also not acceptable. Maximum heights should be much lower, and not left to a separate SPD on height and tall buildings, which will not be taken as seriously as the Local Plan by developers. The Local plan should specify the maximum height and reiterate this in the SPD. The Schedule of Site Proposals is unacceptable in many places, and we cannot agree to the overdevelopment proposed in this schedule. The supply of sites for 46,000 new homes within the document is too high, and the lower London Plan target of 35,460 should be used (2,364 p.a.). Also, the Government are likely to impose their own target of 5,000 new homes a year - clearly this is ridiculous and unacceptable.
Pinkham Way Alliance	Pinkham Way, LB Haringey	<p>4.1 Brief details of the Pinkham Way site.</p> <ul style="list-style-type: none"> • Area c 6 ha. Provides home, breeding and foraging for endangered species. Rich in invertebrates. • Well over 100 plant species, including around 1500 trees (3.5ha). Included in National Forest Inventory. • Areas of priority habitat (open mosaic and lowland deciduous woodland). • Marked on Haringey's Green Grid map and on ALGG Finchley Ridge map as Green Space. • Stands foursquare within London Plan definition of Open Space. This status reinforced by London Plan definitions of Green Space and Green Cover. • Identified by Haringey Nature Conservation Officer as '<i>... an important part of a larger ecological complex and corridor including other SINC's (Hollickwood Park, Muswell Hill Golf Course, Tunnel Gardens and Bluebell Wood, Albert Rd Rec and Rhodes Avenue Spinney).</i>' To the north this green chain connects with Coppetts Wood and Glebelands LNR, to the south with Alexandra Park LNR and Parkland Walk LNR. • Natural England's Reg 18 submission to North London Waste Plan considers the site to be of Metropolitan Importance, a designation identified in London Environmental Strategy Appendix 5 as of '<i>... the highest priority for protection</i>'. • Haringey's ecological consultant described the site in 2014 as '<i>... a rare resource for Haringey of high ecological value</i>'. • Meets the criteria for exclusion from the NPPF and LP definitions of brownfield land / PDL. • The NLWP Sustainability Appraisal comments that the site is '<i>... unlikely to be considered as previously developed land</i>'. The same document detailed potential negative consequences of development as '<i>loss of green infrastructure which could help alleviate the impacts of higher summer temperatures expected as a result of climate change ... a negative impact on the maintenance of open space ... loss of habitat ... loss of trees</i>'. <p>At 2.1.3, the Council's Green Infrastructure SPD 2017 acknowledges that the "duty to cooperate" created by the Localism Act 2011 places a legal duty on the Council to engage constructively, effectively and on an on-going basis on strategic cross-boundary issues. Public bodies have a duty to cooperate on planning issues that cross administrative boundaries. The duty recognises that climate change mitigation and adaptation, biodiversity, ecological networks and flood risk management are all matters better planned at a strategic scale. Thus the Council should provide evidence that it has assessed the site to meet the above requirements in the following sections of the NPPF, July 2021: 98, 99, 119, 120 (b), 153, 174, 175 & 179. The Council, as part owner, should also be aware of footnote 47 to NPPF 119, relating to making as much use as possible of brownfield land / PDL: <i>Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.</i></p> <p>4.2 The Council's management of and attitudes towards the Pinkham Way site. The Council took ownership of Pinkham Way in 1965, and sold the majority of the site to North London Waste Authority in 2011. Around one third of the area it sold - c 1.5 ha - was infested with Japanese knotweed, a classic sign of long term neglect. Giant hogweed was also present, but in smaller quantities The NLWA has now effectively controlled these. During the sale negotiations the Council sought estimates for dealing with the problem, but never followed these through. The result of its egregious lack of long term care described above contrasts with the Council's commitment at 10.26.8 of this draft: '<i>...the Council will work with our existing partnerships, the Mayor, neighbouring boroughs and developers to develop and implement an approach to eradicate such species [ie invasive plant species] ...</i>'. A Council-owned SINC, especially a Grade 1, is an ideal opportunity for a Council to showcase the robustness of its own policies towards open space and biodiversity, without the problems of cajoling owners into meeting their Biodiversity Duty. The London Environmental Strategy, in the narrative to Proposal 5.2.1c, states: <i>Planning policy to protect or create areas of nature conservation value is ultimately ineffective if the habitats protected or created are not properly managed.</i> The commentary might have been written specifically to highlight Barnet's neglect of its own property, in spite of which the site is still so ecologically rich that it is designated SINC Grade 1 (Borough Importance). Barnet's attitude towards the site throughout its period of ownership, above all in its ill-conceived and</p>

Representor	Section	Summary of Comments
		incompetently drafted 2017 housing proposals, indicates, over and above its neglect, an shocking lack of awareness of national and regional guidance, and even of its own policies. We look forward to the opportunity in future consultations to comment in greater detail, with particular reference to Policies ECC04-ECC06.
Canal & River Trust	Strategic Parks and Recreation	The Trust generally welcome the intention to increase walking and cycling connections across the borough and in particular to the Brent Reservoir and inter-connecting green and blue spaces. In principle, we also welcome the intention to open up inaccessible waterways where this is possible and promote them as recreational and commuting routes, to enhance the offer to Barnet residents for health and wellbeing, strengthen the walking and cycling network, and potentially help to address some of the littering that currently goes on in these, at times, unseen places. We also support the promotion of new green chain walking and cycling routes, and long-distance routes, such as the Edgware - Brent Reservoir route, the Barnet Loop, and the two new strategic routes proposed by the Ramblers connecting to either end of the Brent Reservoir We note the proposals for a new Brent Cross West station at the eastern end of the Brent Reservoir with new and enhanced walking and cycling connections. This provides an opportunity to legibly connect to the reservoir, especially across the railway and M1 providing an alternative to the poor-quality environment of the Brent Park Road underpass/tunnel. Whilst it is not a Trust waterway, we note that the spelling of Dollis Brook requires correction in the fourth line of p79.
Pinkham Way Alliance	Summary	<p>PWA considers the draft Local Plan to be unsound, and to lack positive preparation. This opinion is based on, but not limited to, the following reasons.</p> <ul style="list-style-type: none"> • Failure in the Council's duty to cooperate on Strategic Flood Risk with the Boroughs to the east of Barnet. (Haringey, Enfield and Waltham Forest) • Failure to produce a Strategic Flood Risk Policy. • The SFRA excludes the flood impacts that developments in Barnet have on the Lower Lea river network and is therefore not fit for purpose. • Failure to apply the Sequential Test to sites allocated in the Plan and identified as being in flood risk areas. • Failure to carry out a) the "exception test" on sites identified as being in flood risk areas and b) to apply the suitability test set down in Annex 3 of the NPPF. • Failure to assess potential "increase in flood risk elsewhere" from all sites allocated in the Plan. • Failure to assess the safeguarding of land, in particular Pinkham Way, for its suitability for future flood management and for mitigation of the impacts of climate change. • Failure to assess how Green Spaces both within and contiguous to Barnet, including Pinkham Way, reduce the causes and impacts of flooding. • Failure to examine how new development can contribute to reducing the causes and impacts of flooding both inside and outside Barnet. • Failure to assess and develop an integrated approach to flood risk management. Failure to examine how existing development, identified in flood risk areas, could be relocated to more sustainable locations.
GLA – Planning	Transport	The plan supports the West London Orbital rail scheme, setting out areas where this scheme could be a catalyst for growth. The plan could adopt a more cautious wording about its delivery to reflect the fact that the scheme remains unfunded at the present time. The parking standards in the plan conform with the London Plan and this is welcomed. The accompanying text and site allocations will need to be updated to reflect this approach. In particular, references to parking 'requirements' or 'needs' should be further qualified and related only to disabled persons parking and operational parking. Although the reliance on assessing orbital travel has been modified slightly, TfL continues to have concerns about such a connectivity measure that could be used inappropriately and also open to challenge.
Barnet Climate Action Group	Transport and Communications	Reducing car dependency, encouraging sustainable travel and improving air quality are all supported as part of Policy TRC01 (Sustainable and Active Travel). However, Barnet's ambition of 72% for sustainable modes of transport is far below the Mayor of London's Transport Strategy aim for 80% of all trips in London to be on foot, by cycle or public transport by 2041 and this should be improved. While the ambition shown in the Barnet Draft Local Plan does not aim to reach 80%, there is also a lack of ambition around electric vehicle charging infrastructure, which will be required if Barnet remains a private vehicle focused borough. Policy TRC02 (Transport Infrastructure) highlights a commitment to provide infrastructure with little to say on what needs to be provided and TRC03 (Parking Management) highlight commitments to reach London Plan standards but not about assessing and addressing the local need for EV charging within that development.
Haringey Council	Waste	Barnet Council has joined with Haringey and five other North London Boroughs to produce the North London Waste Plan (NLWP) which will form part of our respective Development Plans and sit alongside the North London Joint Waste Strategy to secure the sustainable management of waste in the region. Haringey supports Policy ECC03 Dealing with Waste which sets out a range of ways Barnet will encourage sustainable waste management including safeguarding all existing waste facilities in Barnet. Haringey will continue to work with Barnet and the five other North London Boroughs in progressing the NLWP through to adoption and designating sites to meet an aggregated apportionment target across the seven North London Boroughs.

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- ⁱ <https://cyclingindustry.news/a-sale-every-3-minutes-electric-bikes-oussell-electric-cars-in-uk-during-2020/>
- ⁱⁱ <https://ebiketips.road.cc/content/news/bosch-reckons-half-of-all-bikes-sold-in-2025-will-be-electric-3199>
- ⁱⁱⁱ A guide to Low Traffic Neighbourhoods <https://lcc.org.uk/pages/low-traffic-neighbourhoods>
- ^{iv} <https://www.healthystreetscorecard.london/>
- ^v Waltham Forest mini-Holland evidence: <https://wfcycling.wordpress.com/mini-holland/evidence/#LocalEconomy>
- ^{vi} Cycling in London and Holland: <https://youtu.be/zq28fU2AuMU>
- ^{vii} Enfield declares climate emergency: <https://new.enfield.gov.uk/news-and-events/council-declares-climate-emergency/>
- ^{viii} Residential parking in The London Plan: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-10-transport/policy-t61-residential-parking>
- ^{ix} Value of cycling report: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509587/value-of-cycling.pdf

Local Plan related documents	Regulatory Stages and Timetable					
<p>Documents listed below, together with the Mayor's London Plan, comprise Barnet's local development documents.</p> <p>Development Plan Document (DPD)</p>	<p>Evidence gathering and pre-preparation stage</p> <p>(Including consulting on sustainability reports where applicable)</p>	<p>Reg 18: Preparation of Local Plan and Consultation</p> <p>Opportunity for interested parties and statutory consultees to be involved at an early stage.</p>	<p>Reg 19: Publication of Local Plan</p> <p>The Council publishes the draft plan allowing a period of at least 6 weeks to make representations on the draft plan.</p>	<p>Reg 22: Submission</p> <p>The Council submits the Local Plan and supporting evidence to the Secretary of State together with Reg 19 representations received.</p>	<p>Reg 24: Examination in Public</p> <p>Conducted by an independent Planning Inspector</p>	<p>Reg 26: Adoption</p> <p>Subject to outcome of examination, the Council formally adopts the plan.</p>
<p>Local Plan for Barnet DPD</p> <p>The new Local Plan for Barnet looks ahead to 2036 and comprises a suite of strategic and development management policies together with site proposals and a Policies Map. The existing AAPs for Mill Hill East and Colindale remain extant. Adoption of the new Local Plan replaces the Core Strategy and Development Management Policies documents (adopted in 2012).</p>	2017-ongoing	2019/20	Mid 2021	Late 2021	Mid 2022	Early 2023
<p>North London Waste Plan DPD</p> <p>Allocates sites for development of waste management facilities and provides a planning policy framework for decision making on waste management facilities.</p>	2014-2017	Late 2014	2018/19	Mid 2019	Late 2019	Late 2021
<p>Neighbourhood Plans</p>	<p>Reg 14 Pre Submission & Consultation</p>			<p>Examination</p>	<p>Referendum</p>	<p>Adoption</p>
<p>West Finchley Neighbourhood Plan</p>	2019			Mid 2020	Mid 2021	Late 2021
<p>Supplementary Planning Documents (SPD)</p>	<p>Evidence Gathering / Production</p>			<p>Consult</p>	<p>Reg 13 - Reqs Assessment</p>	<p>Adoption</p>

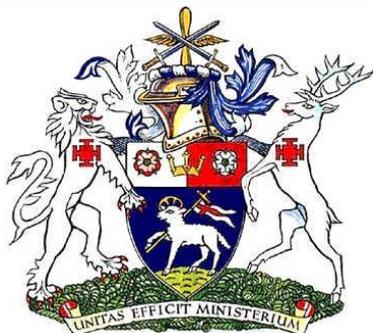
Documents listed below add further detail and guidance to the policies contained in Barnet's Local Plan				
Brent Cross Cricklewood Growth Area * The SPD will be based on review of the 2005 Planning Development Framework for Brent Cross and Cricklewood Regeneration Area	2022 - 2023	2023	2024	2024
Designing for Density SPD The SPD will provide detailed parameters to Local Plan policy to provide a well-considered response to achieving higher density development that takes account of best practice and guidance in optimising land use and development capacity; including the assessment of appropriateness of tall building proposals in strategic locations with identified site-specific, and character considerations to ensure that the development of tall buildings occurs in the most appropriate parts of the borough. It will identify typologies related to uses, form, public realm, safety, amenity, and microclimates. The SPD will progress in stages alongside and following the adoption of the Local Plan.	2021-2022	Late 2022/23	2023	2023/24
Sustainable Design & Development Guidance SPD Merge, review and update of existing 2016 Residential Design Guidance and Sustainable Design and Construction SPDs to supplement relevant Local Plan Policies. The SPD will be updated following the adoption of the Local Plan. It will provide guidance on implementing a range of sustainability measures including increased energy efficiency, reduced carbon emissions, reduction of land, water, noise air pollution, reduce resource use and waste.	Mid 2022	Late 2022	Late 2022	2023
Planning Contributions SPD Review and merge existing Planning Obligations and Skills Employment Enterprise & Training SPD to supplement emerging Local Plan Policies.	2021 - 2022	Mid 2022	Late 2022.	Late 2022

Green Infrastructure SPD Review and update as necessary existing SPD to supplement emerging Local Plan Policies. The SPD will be updated following the adoption of the Local Plan. It will provide guidance on delivering green measures including biodiversity net gain, urban greening factor and restoration of Barnet's blue infrastructure.	2022	Late 2022	Early 2023	Late 2023
Other Planning Documents	Evidence Gathering / Production			
Community Infrastructure Levy (CIL) Charging Schedule The CIL charging schedule is the primary means of funding local infrastructure.	2019 - 2020	Mid 2021	Late 2021	Early 2022
Colindale and Burnt Oak Masterplan ** To support the continued implementation of Colindale AAP - and establish future priorities for healthy and connected places, place-based initiatives	2021 - 2022	Mid 2022	2023	2023

**Delivered by Brent X Team with planning support*

***Delivered by Growth / Regeneration Team with planning support*

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Policy and Resources Committee

30 September 2021

Title	West Finchley Neighbourhood Plan - Adoption
Report of	Chairman of the Policy and Resources Committee
Wards	West Finchley
Status	Public
Urgent	No
Key	Yes
Enclosures	<ul style="list-style-type: none"> • Appendix A – West Finchley Neighbourhood Plan • Appendix B – Inspector’s Report • Appendix C – Referendum Result
Officer Contact Details	Nick Lynch – Planning Policy Manager Nick.Lynch@barnet.gov.uk

Summary

The West Finchley Neighbourhood Plan has been prepared by the West Finchley Neighbourhood Forum and will following adoption form part of the statutory development plan for the area. This means that its policies will be the starting point for decision makers when determining any planning application either partly or wholly within the neighbourhood area. This is the first Neighbourhood Plan to reach adoption in Barnet.

The Neighbourhood Plan has passed examination by an independent planning inspector as well as a confirmatory referendum on 8th July 2021. Following the community’s endorsement of the plan the final step is for it to be formally ‘made’.

Recommendations

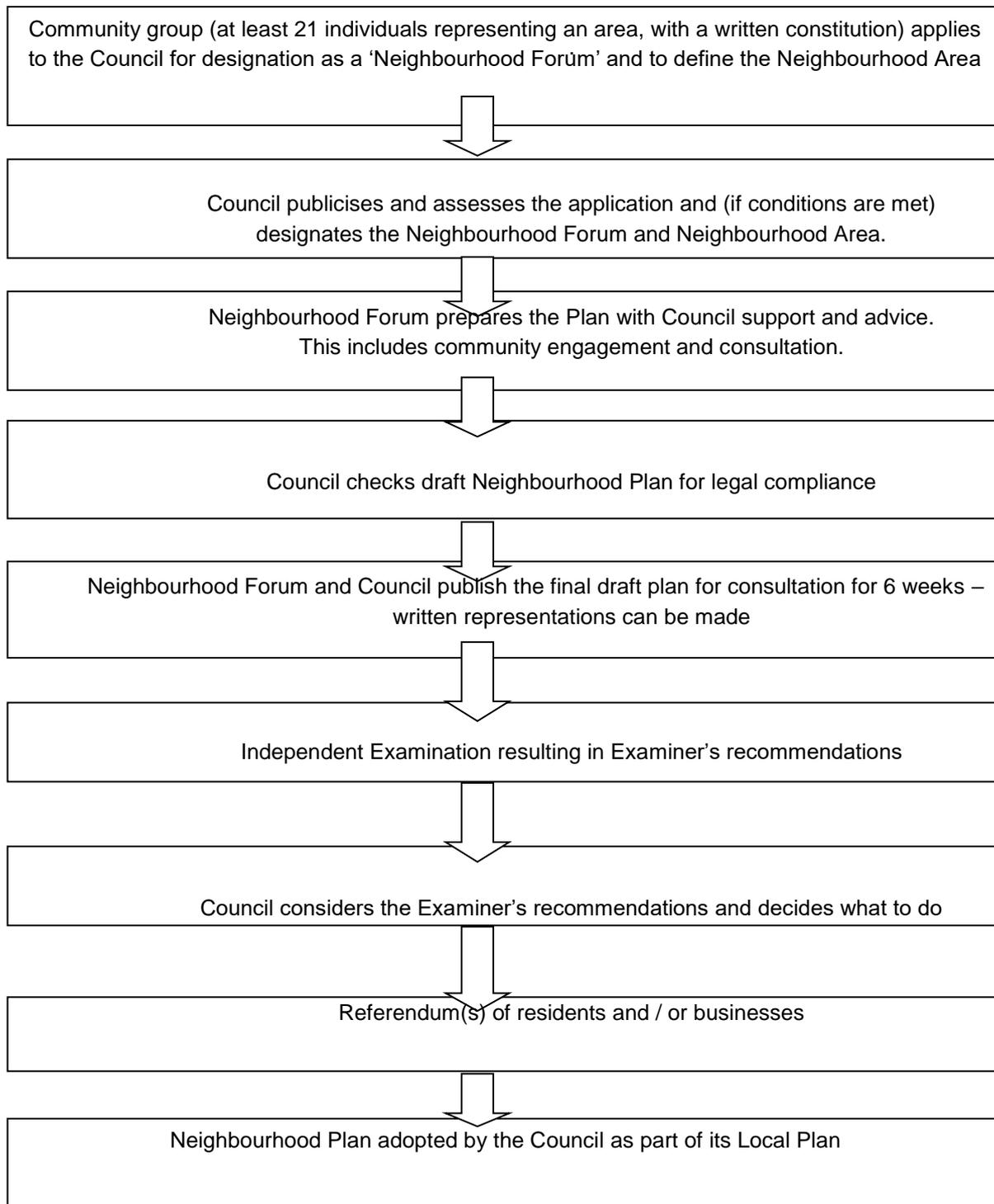
That the Policy and Resources Committee:

- 1. Note the contents of the Inspector's Report (Appendix B) and the results of the West Finchley Neighbourhood Plan referendum held on 8 July 2021 (Appendix C)**
- 2. Approve the West Finchley Neighbourhood Plan (WFNP) (Appendix A) for reference to the meeting of Council on October 19th 2021 for formal adoption.**

1. WHY THIS REPORT IS NEEDED

- 1.1 The Localism Act 2011 introduced a new right for communities in England to undertake Neighbourhood Planning. The 2011 Act places duties on local planning authorities to support the preparation of Neighbourhood Development Plans (NDPs). These are statutory planning documents which are prepared by a Parish Council or designated body known as a "Neighbourhood Forum". Within Barnet the West Finchley Neighbourhood Plan (WFNP) is the first NDP to have reached adoption.
- 1.2 NDPs can establish general planning policies for the development and use of land in a neighbourhood. Plans can be detailed, or general, depending on what local people want; and, if appropriate, they can focus on a single planning issue. NDPs must support growth and should not be used to block development. They must be in general conformity with the strategic policies in the existing development plan. They must also comply with other relevant legislation, including EU directives and the Human Rights Act 1998.
- 1.3 A summary of the process of Neighbourhood Forum designation and NDP preparation is set out at Table 1. Adoption of a Neighbourhood Development Plan should usually be completed within the initial five-year designation period. For West Finchley it has taken 6 years.
- 1.4 The West Finchley Neighbourhood Plan Area is a residential suburb of predominantly inter-war semi-detached housing. The area covers around 35 hectares and has a population of 3,000 people. The WFNP covers 5 main themes to support development that will occur in the area through to 2035. These are that follows:
 - Residential Development – which covers policies on utilising the Neighbourhood Plan Design Guide, Secure Homes, Layout of New Residential Development and Basement Developments
 - Amenities – which covers policies on Local Parade of Shops, Community facilities, Local Green Spaces and Utilities Infrastructure
 - Streetscape – which covers policies on Local Character and Heritage and Public Realm Improvements
 - Local Environment – which covers policies on Dollis Valley Greenwalk Flood Risk, Trees and Air Quality
 - Transport – which covers policies on Electric Charging Points, On Street Parking and West Finchley Underground Station

Table 1: Summary of the Neighbourhood Development Plan preparation process



2. REASONS FOR RECOMMENDATIONS

2.1 In accordance with the Localism Act the Council has a duty to support Neighbourhood Planning in terms of the following:

- Designation of Neighbourhood Areas and Forums
- Advising and supporting Neighbourhood Forums in production of Plans
- Publicise Neighbourhood Development Plan proposals
- Arrange for independent examination
- Arrange referendums on the Neighbourhood Development Plan
- Adopt Neighbourhood Development Plans, where all requirements have been met.

Examination of Neighbourhood Plan

2.2 The Council and the West Finchley Forum agreed upon an independent examiner to consider the contents of the draft WFNP in terms of its legal requirement to meet 'basic conditions' including regard to national planning policies as well as those contained within Barnet's development plan consisting of London Plan and Local Plan. The Examiner's report concluded that, subject to making recommended modifications (incorporated into WFNP at Appendix A), the WFNP meets the basic conditions and should proceed to Referendum. The Examiner also recommended that the neighbourhood area is an appropriate area within which to hold a referendum. The Council agreed with the Examiner's recommendations.

Referendum on Neighbourhood Plan

2.3 The WFNP Referendum was held on 8 July 2021. Voters were asked '*Do you want the London Borough of Barnet to use the Neighbourhood Plan for West Finchley to help it decide planning applications in the neighbourhood area?*'

2.4 All residents on the electoral register within the WFNP area were entitled to vote. There is no minimum turnout for the referendum to be valid. The result is based on a simple majority. If there is a majority 'no' or tied vote then the Neighbourhood Plan will not be adopted.

2.5 The verification statement and full results from the referendum are attached at Appendix C. There were 396 ballot papers issued (a turnout of 28.6%). From the 396 ballot papers 329 voted in favour of the WFNP (83.08%) and 67 voted against (16.92%). Under the legislation the Council is now legally bound to make the Neighbourhood Plan.

2.6 The Neighbourhood Planning Regulations require the Council to publish a Decision Statement as soon as possible after the local planning authority makes the decision on whether to make the Neighbourhood Plan part of the development plan.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

3.1 The alternative option is to not adopt the WFNP. This decision could be legally challenged. The Council's reputation will be damaged by this as there is a duty to support NDPs and the WFNP has passed examination and a confirmatory referendum.

4. POST DECISION IMPLEMENTATION

- 4.1 Upon adoption the WFNP will become part of the statutory development plan for Barnet.
- 4.2 The West Finchley Neighbourhood Forum will continue to engage with the wider community in the implementation of the Neighbourhood Plan as well as continuing to work the West Finchley Residents' Association, local residents and West Finchley Ward Councillors to promote and improve the social, economic and environmental well-being of the West Finchley Area.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 The Council's Corporate Plan 2021-2025 sets out four priorities for the Council, these are:
- Clean, safe and well run – a place where our streets are clean and anti-social 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 health lives; and
 - Thriving – a place fit for future, where all residents, businesses and visitors benefit from improved sustainable infrastructure & opportunity.
- 5.1.2 These key priorities are reflected throughout the Neighbourhood Development Plan for West Finchley Area, in particular family friendly and clean, safe and well-run. A NDP helps provide a more local dimension that reflects boroughwide Local Plan as well as Corporate Plan priorities. A basic condition for a Neighbourhood Forum is that it promotes or improves well-being through the production of a NDP giving local people more influence over the future of their area.

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

- 5.2.1 To date the primary cost to the Council associated with the WFNP has been officer support time, examination of the Neighbourhood Plan and the Referendum. This has been absorbed by Re and thus contained within existing budgets. No specific allocation of Council resources has been approved to support expenditure relating to production of NDPs or the re-designation of the Forum.
- 5.2.2 Financial support for local planning authorities in the form of Neighbourhood Planning Grant is currently available from MHCLG. At present this amounts to £30,000 for non-parished areas such as London Boroughs and is paid as the Neighbourhood Development Plan progresses to adoption. The first payment of £10,000 is made following Neighbourhood Area and Forum designation including re-designation. The second payment of £20,000 is made on successful completion of the examination. The Council have received both payments.

5.2.3 NDP may also impact on decisions relating to the allocation of CIL (Community Infrastructure Levy). Following NDP adoption the area covered by the Plan can access 25% of CIL arising from the development that takes place in their area if it is generated as a consequence of the implementation of the NDP. This money will be retained by the Council but must be spent in accordance with local infrastructure priorities as highlighted in the NDP.

5.2.4 The costs associated with developing the Neighbourhood Plan have been met by the West Finchley Forum.

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. Neighbourhood Development Plans can help secure such benefits.

5.3.2 Social benefits will also be secured by the Neighbourhood Development Plan providing a local dimension to the housing and infrastructure requirements of Local Plan policy.

5.3.3 Economic benefits will be delivered through the Neighbourhood Development Plan's focus on the local economy including the shopping parade and employment spaces within West Finchley.

5.3.4 Environmental benefits will be delivered by a Neighbourhood Development Plan's response to resolving local issues as regards biodiversity, climate change mitigation and adaptation, sustainable travel, flood risk management and improved air and water quality.

5.4 **Legal and Constitutional References**

5.4.1 A legal challenge can be brought by any interested person in relation to:

- A LPA declining to make an NDP if an applicable referendum resulted in over half of those voting (50% plus 1) in favour, as soon as reasonably practical. The LPA is not subject to the duty if it considers that the making of the plan would breach, or otherwise be incompatible with any retained EU obligation or any of the Convention rights within the meaning of the Human Rights Act 1998
- The consideration of inspector's recommendations and decisions made upon them
- The conduct of the referendum

5.4.2 Should a challenge be brought on some or all of the above grounds this would necessarily delay adoption of the WFNP. Furthermore, the LPA would need, in consultation with the West Finchley Neighbourhood Forum and interested others, to assess the benefits of defending such a challenge against the potentially considerable costs involved.

5.4.3 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 (except for matters reserved to Full Council).

5.5 Risk Management

- 5.5.1 If the Council decides not to make the Plan, there is a risk that this decision could be legally challenged together with potential risks arising out of a legal challenge on other grounds.

5.6 Equalities and Diversity

- 5.6.1 There are no specific equalities issues identified with the Council adopting the WFNP part of the development plan for Barnet.

5.7 Corporate Parenting

- 5.7.1 N/A

5.8 Consultation and Engagement

- 5.8.1 Statutory consultation has taken place during the preparation of the WFNP. A confirmatory referendum has taken place.

5.9 Insight

- 5.9.1 N/A

6. BACKGROUND PAPERS

- 6.1 Planning Committee, 13th October 2020 (Decision Item 9) approved Re-designation of West Finchley Neighbourhood Area and Forum Applications for adoption <https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=703&MId=10130&Ver=4>
- 6.2 Planning Committee, 26th November 2015 (Decision item 11) approved Designation of West Finchley Neighbourhood Area and Forum applications for adoption. <https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=703&MId=8303&Ver=4>
- 6.3 Council, 11 September 2012 (Decision item 4.1) approved the Local Plan Core Strategy and Development Management Policies for adoption. <http://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=162&MId=6671&Ver=4>
- 6.4 Policy and Resources Committee, 23 October 2018 (Decision item 13) approved Barnet's Statement of Community Involvement <https://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=692&MId=9459&Ver=4>

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WEST FINCHLEY
NEIGHBOURHOOD FORUM



West Finchley Neighbourhood Plan 2020-2035

JUNE 2021



Contents



- 1.0 Introduction
- 2.0 A Portrait of West Finchley
- 3.0 Planning Policy Context
- 4.0 Overall Vision
- 5.0 Residential Development
- 6.0 Amenities
- 7.0 Streetscape
- 8.0 Local Environment
- 9.0 Transport
- Glossary

Supporting Documents

- A. Proposals Map
- B. West Finchley Neighbourhood Plan Design Guide

Evidence Base Documents

- A. West Finchley Neighbourhood Plan Heritage and Character Assessment
- B. Engagement Report
- C. Baseline Report
- D. Local Green Spaces Designation Paper
- E. Basic Conditions Statement
- F. Map of WFNP Area
- G. West Finchley Evidence Base and Policy Development Report

1.0 Introduction

Purpose of the Neighbourhood Plan

- 1.1 This Neighbourhood Plan has been created to ensure residents of West Finchley can positively influence the future of our neighbourhood over the next 15 years.
- 1.2 The Neighbourhood Plan acts both as a community strategy and a formal planning policy document. For this reason, aspects of the Neighbourhood Plan are written in technical planning language. Technical terms used in the text are defined in the Glossary at the back of this report.

What is a Neighbourhood Plan?

- 1.3 A Neighbourhood Plan is a statutory planning policy document, against which applications for planning permission within its boundaries must be considered. A Neighbourhood Plan sets out a framework for planning decisions at a local scale, allowing local people to determine what type of development they would like to see in their neighbourhood and identify locations where growth should be accommodated. It is important to note that the Neighbourhood Plan policies are not applied retrospectively. The policies only apply to new development that comes forward after the Plan is adopted.
- 1.4 The Neighbourhood Plan does not have any effect on development allowed by the Town and Country Planning (General Permitted Development) (England) Order 2015 (the 'GPDO'). While permitted development is exempt from being assessed against development plan documents, landowners and developers are strongly encouraged to have due regard for the vision and objectives of the Neighbourhood Plan and the Design Guide (as included at Supporting Document B), even if a planning application is not required.
- 1.5 Neighbourhood Plans sit alongside Development Plan Documents prepared by the Greater London Authority (GLA) and the London Borough of

Barnet (LB Barnet). The current Development Plan is composed of the London Plan 2021, the Barnet Core Strategy (2012) and development Management Policies (2012).

- 1.6 In order to pass examination, the West Finchley Neighbourhood Plan must be in 'general conformity' with the strategic policies of the adopted Development Plan Documents produced by the GLA and LB Barnet. It must also have regard to national planning policy and guidance, uphold the principles of sustainable development and conform to a number of EU Directives. The Basic Conditions Statement (Evidence Base Document E) demonstrates compliance with these requirements. The policies in this Neighbourhood Plan are based on robust evidence and seek to fit into the wider planning context.

Key Facts

- 1.7 The West Finchley Neighbourhood Plan is prepared in accordance with the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan Area was formally designated by LB Barnet following approval at Planning Committee on 26th November 2015. The Neighbourhood Plan has a base date of 2020 and will run to 2035.
- 1.8 The Neighbourhood Plan Area covers approximately 35 hectares (0.14 square miles), is home to about 3,000 people (based on 2016 Office for National Statistics population projections) and includes around 700 individual addresses.

Who has created the West Finchley Neighbourhood Plan?

- 1.9 The West Finchley Neighbourhood Forum, a designated neighbourhood forum comprised of people living, working or representing the West Finchley Neighbourhood Plan Area, oversees the preparation of the West Finchley Neighbourhood Plan. The day-to-day management of the



WEST FINCHLEY NEIGHBOURHOOD FORUM

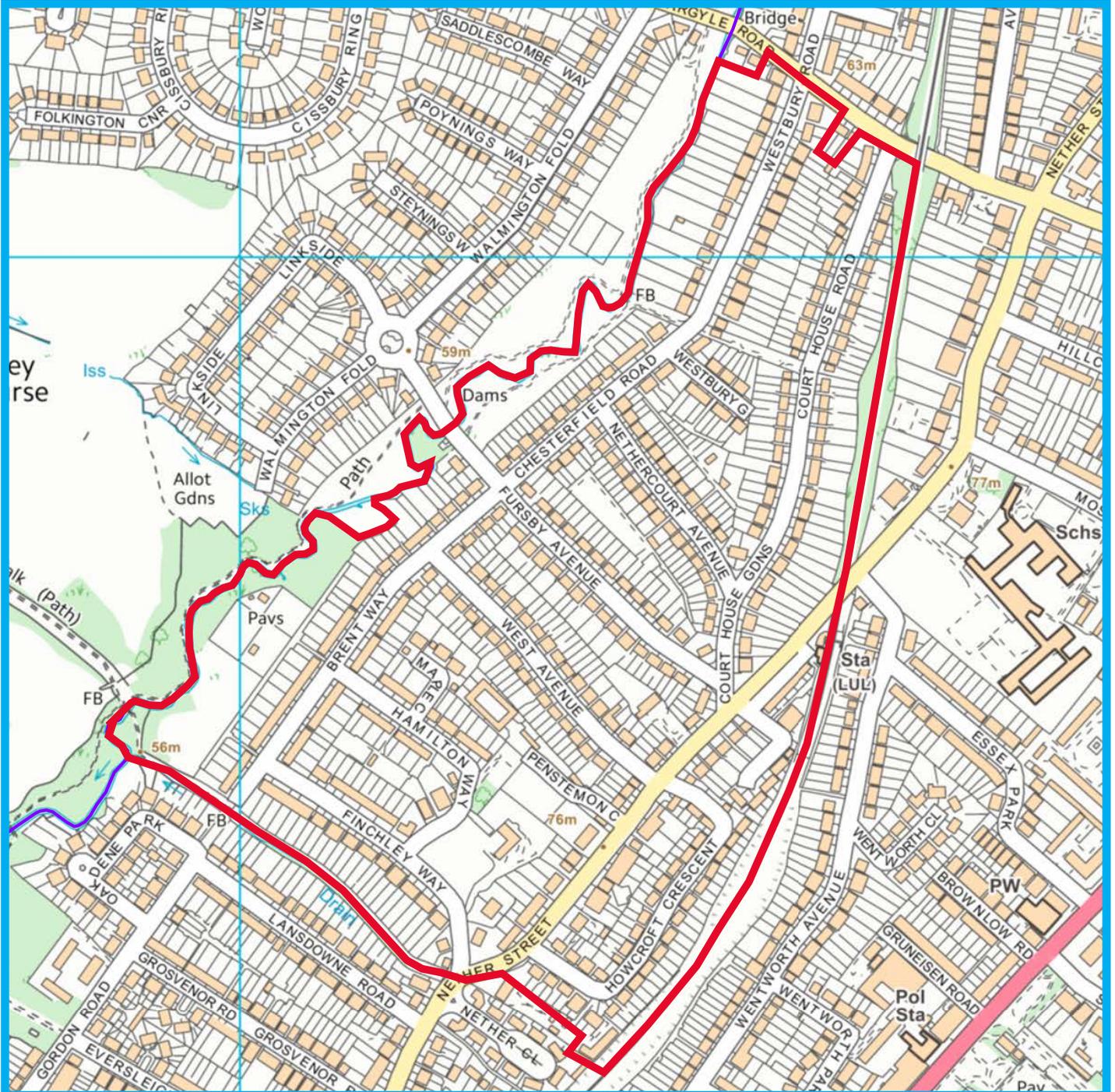


Figure 1.1: West Finchley Neighbourhood Plan Boundary

Neighbourhood Plan is devolved to an elected Executive Committee of Forum members. The Neighbourhood Plan has benefited from the professional support of Nexus Planning, a planning consultancy with a track record of supporting the preparation of Neighbourhood Plans. Nexus Planning's support has been paid for through grant funding from central government.

How has the community been engaged?

1.10 To date, there have been three rounds of comprehensive community engagement. These exercises and the feedback received are detailed in full in a separate **Engagement Report (Evidence Base Document B)**, but can be summarised as follows:

1. Engagement 1: Key Issues (February 2015).

This round of engagement was completed prior to the commencement of the West Finchley Neighbourhood Plan, scoping the local appetite for a Neighbourhood Plan and the issues residents thought it ought to address. In total, volunteers spoke directly with an estimated 40% of households in the Neighbourhood Plan Area. A survey was also conducted with 124 individual responses. The responses to the survey, which focused on the positive and negative features of the area, have informed the scope of the Neighbourhood Plan.

2. Engagement 2: Vision and Objectives (October – November 2017).

This round of engagement presented the draft Vision and Objectives of the West Finchley Neighbourhood Plan, which the policies will seek to deliver. The engagement involved a leaflet drop to all addresses in the Neighbourhood Plan Area and two consultation events. Residents were invited to complete an online survey with paper copies available. In total, 133 responses were received, which were supportive of the proposed vision and objectives and the comments made have

been used to inform this draft Neighbourhood Plan, including refinement to those objectives presented at Consultation.

3. Engagement 3: Regulation 14 Consultation (April – July 2019).

This round of consultation was the pre-submission consultation and publicity as required by Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. The engagement involved a flyer drop, leaflet drop, and two public drop-in sessions. During the leaflet drop volunteers spoke to an adult at about 40% of addresses. Residents were invited to complete an online survey with paper copies made available. In total, 129 responses were received, the majority of which were supportive of the Neighbourhood Plan proposals.

How to read this Neighbourhood Plan

1.11 This Neighbourhood Plan is broken down into a number of themes related to Key Themes, which are:

Section 5.	Residential Development
Section 6.	Amenities
Section 7.	Streetscape
Section 8.	Local Environment
Section 9.	Transport

More detail on each of the Key Themes is contained in Section 4 of this Neighbourhood Plan.

1.12 Each theme includes Introduction, Vision, Objectives and Policies as well as supporting diagrams. In addition to the diagrams within each theme, this Neighbourhood Plan is supported by a Proposals Map (Supporting Document A), which includes all land designations relevant to the policies of the Neighbourhood Plan.



WEST FINCHLEY

NEIGHBOURHOOD FORUM



2.0 A Portrait of West Finchley

- 2.1 This Section summarises the findings of the **Baseline Report (Evidence Base Document C)**, which compiles various sources of evidence available to build a profile of the West Finchley Neighbourhood Plan Area.
- 2.2 The WFNP Area is located in North London, within LB Barnet. The area is approximately 35 hectares in size. The Dollis Brook (west), Lovers Walk (south), the Northern Line (east) and Argyle Road (north), mostly define its boundaries. Argyle Road itself is not within the area. A map showing the area is provided on page 5 of this document and in high resolution as **Evidence Base Document F**.
- 2.3 The area is predominantly in residential use, with a prevalence of inter-war semi-detached housing, interspersed occasionally with other types of residential developments. Over 60% of the area is comprised of residential buildings and their gardens.
- ### Population and people
- 2.4 At the time of the 2011 Census, the population of the WFNP Area was about 3,000. In recent years, the population has generally stayed around this mark, despite year-on-year fluctuations. This is in comparison with LB Barnet, London and England, which have all seen steady growth.
- 2.5 The 2011 Census showed that the WFNP Area has a resident age profile that is broadly consistent with other areas. This is with the exception of young adults (aged 16-29), where the percentage of the population is considerably lower than the LB Barnet overall, London and England populations (around 5% lower at about 15%). This is not altogether surprising in an area with family-sized housing, however, it is worth noting that the young adult population has fallen steadily since 2001. Children aged 0-15 and the population over the age of 30 relatively evenly make up the difference. There is also a relatively high proportion of residents who are over the age of 80, (5% compared with 3% for London and 4.6% for England).
- 2.6 The 2011 Census shows that the ethnic profile in the WFNP Area is diverse, with a lower proportion of white residents (just over 50%) in comparison to LB Barnet overall (about 65%), London (about 60%) and England (about 85%). Most non-white residents in the area are of Asian/British Asian heritage (about 30%) or 'other' heritage, which includes Arab/Middle-Eastern (about 8%), with a small Black/African/Caribbean/Black British population (about 2-3%).
- 2.7 The WFNP Area is highly diverse when it comes to religion, as indicated in response to the 2011 Census. It has a much lower number of Christians (about 35%) than England (just below 60%) and to a lesser extent London (just below 50%) and LB Barnet overall (just above 40%). It also has a significant Jewish population (about 10%) when compared to London (about 2-3%) and England (about 1%), but not as high as LB Barnet overall (about 15%). The Muslim (about 8%), Buddhist (about 4%) and Hindu (about 10%) populations are also higher than the LB Barnet overall, and London and England proportions. Finally, a proportion of the population either is non-religious (about 22%) or did not state their religious views (about 10%).
- 2.8 Just over 40% of WFNP Area residents were born outside of the UK, which is noticeably higher than LB Barnet overall and London and almost three times more than in England. Of that population, about 30% were born outside of the EU, 10% within the EU (excluding Ireland) and 2% in Ireland.
- 2.9 Concerning deprivation, the WFNP Area is in the 20% least deprived areas in the country in terms of the main domains of income deprivation, employment deprivation, education skills and training deprivation and health deprivation and disability. It is more deprived in terms of the lesser



WEST FINCHLEY

NEIGHBOURHOOD FORUM



three domains, namely crime, barriers to housing and services and living environment deprivation, but this deprivation is minor and does not affect the area's profile as an relatively affluent area.

Housing

- 2.10 Most properties in the WFNP Area are interwar semi-detached housing. Over time a small number of these properties have been converted into flats. In addition, there is a small amount of detached housing, terraced housing and purpose built flats.
- 2.11 A considerable number of properties in the WFNP Area are owner occupied (over 60%). Most remaining properties are privately rented (just below 30%) and the remaining 10% are socially rented.
- 2.12 There is a mix of household composition, with a significant proportion of couple households (about 60%, which are split quite evenly in terms of having dependent children or not), a number of one person households (about 20%) and about 15% of households are of unrelated adults living together.
- 2.13 The London Plan 2021 gave a ten year housing target for LB of Barnet of 31,640 new homes between 2019/20 and 2028/29. However, there is little opportunity to contribute to meeting this need in the WFNP Area due to a lack of empty plots or housing in need of renewal.

Employment

- 2.14 Most people of working age in the WFNP Area are economically active (almost 75%). A considerable number of economically active residents work in either professional occupations (over 30% compared to about 25% in LB Barnet overall, 20% in London and 15% in England) or in managerial, directorial or senior roles (just below 20% compared to about 15% in Barnet, 12% in London and 10% in England).

- 2.15 Most residents travel to work either by train (including the London Underground) (over 45%) or by car (over 30%). The most common distance travelled to work is 10km-20km, which includes most employment clusters in central London (including the West End, the City and Canary Wharf) and some towns immediately north of London (such as Watford). The remainder of residents generally work closer to home, including about 15% of working age people who work primarily from home.

- 2.16 There are no formal employment locations in the WFNP Area, such as offices or industrial locations. However, there are a small number of uses that provide employment, including retail units, a nursing home and an osteopath.

Retail

- 2.17 The WFNP Area includes a limited retail offer, with a row of small retail units along Nether Street, adjacent to West Finchley Underground Station.

Transport

- 2.18 Transport accessibility in the WFNP Area is regarded to be poor-moderate in the context of London by TfL. However, the presence of West Finchley Underground Station and a bus route offer a range of options and locals regard the area to be accessible.
- 2.19 London Cycle Network Route 85, which runs from Barnet to Ealing, crosses through the WFNP Area, towards its west edge from the boundary with Argyle Road, along Westbury Road/Chesterfield Road/Brent Way to the boundary with Lovers Walk. While streets in the WFNP Area are useable by cyclists, none have formal cycle lanes or paths.
- 2.20 Segregated walking routes in an around the area include Dollis Valley Greenwalk, which follows the Dollis Brook, running from the Moat Mount Open Space, north of Edgware, and continuing south



WEST FINCHLEY

NEIGHBOURHOOD FORUM



to the Hampstead Heath Extension, and Lovers Walk, a historic pathway that forms the southern boundary of the WFNP Area. The Greenwalk is mostly a shared cycle/pedestrian route.

- 2.21 On-street parking in the WFNP Area is mostly unrestricted. This is with the exception of Nether Street, which has some double yellow line road markings. These markings also extend along limited sections of roads that connect to Nether Street in the vicinity of West Finchley Underground Station. The WFNP has conducted a Parking Survey of the area to further understand pressure on on-street parking spaces. The Parking Study is contained in the **Baseline Study at Evidence Base Document C (Chapter 8)**.

Leisure, community facilities and social infrastructure

- 2.22 The WFNP Area includes the following formal and informal leisure and community facilities (including green spaces):

- **An open space (between Hamilton Way, Finchley Way, The Drive and Penstemon Close), owned by LB Barnet** – although not formally designated, this space is the largest green open space within the area and is used by local residents, who can freely access it through three gates.
- **Gordon Hall** – located off Huntly Drive, this venue was purpose built as a Scout Hut and is owned by a Trust on behalf of the 10th Finchley (Scottish) Scout Group. The venue continues to be used by the Scouts, but is also let out to the community for local events and activities such as yoga, Beavers, and a day nursery each day. A local Hindu religious group holds events there most Saturday evenings.
- **Finchley Lawn Tennis Club** – located off Brent Way, the tennis club has five all-weather courts and serves a broad catchment within the wider

Finchley area. The club house has recently been refurbished as part of the club's centenary celebrations. The clubhouse can be rented by local residents and groups. Additionally, the club has a social membership for non-players and a 'Crinkleys' club for those no longer able to play tennis which meets every Wednesday morning. The club also provides coaching for adults and children, including free sessions for Year 4 pupils at Moss Hall Primary School. The land is owned by LB Barnet and leased to the Tennis Club.

- **The Dollis Valley Greenwalk (and public open space to the east of the Walk)** – running along the Dollis Brook, this area provides a venue for use of informal public open space and formal footpaths. The Greenwalk is owned by LB Barnet.
- **Two sets of allotments** – One adjacent to the Lawn Tennis Club off Brent Way (Brent Way Allotments) and one accessed from Nethercourt Avenue (Nethercourt Avenue Allotments). The allotments are owned by LB Barnet and leased to Finchley Horticultural Society. The Brent Way Allotment site has nine plots, while Nethercourt Avenue site has 13 plots. Neither have vacancies and both have substantial waiting lists.

- 2.23 Community infrastructure is limited within the WFNP Area, with residents using schools, health centres (including doctors and dentists) and other services outside of its boundaries.

Environment and sustainability

- 2.24 The Dollis Brook forms the western boundary of the West Finchley Neighbourhood Plan area. Its immediate surrounds are recorded by the Environment Agency as areas of flood risk, ranging from low to high.
- 2.25 Surface water flood risk can be found along a number of routes in the area, including Chesterfield Road, Nethercourt Avenue, Hamilton Way, Lovers Walk and most noticeably Fursby Avenue. Local people have rarely experienced



WEST FINCHLEY

NEIGHBOURHOOD FORUM



surface water flooding along these routes and therefore, as these roads slope fairly steeply towards Dollis Brook, they may be channels that feed in to the Dollis Brook rather than locations where surface water accumulates as standing water.

- 2.26 A number of bird species have been spotted in the area and the Department for Environment and Rural Affairs officially notes it as hosting three bird species, lapwings, tree sparrows and turtledoves. It also records the presence of Deciduous Woodland spanning the area immediately surrounding the Dollis Brook, which is important for flood control.
- 2.27 The undeveloped land surrounding the Dollis Brook is partially Metropolitan Green Belt and partially Metropolitan Open Land. This site is also a Site of Borough Importance for Nature Conservation, as shown in Figure 2.1.
- 2.28 The WFNP Area is notable for a range of trees, including along streets, within the Dollis Valley Greenwalk, in the open space between Hamilton Way, Finchley Way, The Drive and Penstemon Close, within the grounds of Cedar Court, in residential gardens and along Lovers Walk. These are mostly mature or semi-mature, comprise a range of species and are mainly in good health. In recent years a number of trees have been removed, some of which have yet to be replaced.
- 2.29 The WFNP Area falls within a borough-wide Air Quality Management Area (AQMA). However, the LB Barnet 2015 Air Quality Management Report does not note the WFNP Area as being an area with particularly poor air quality and it is evident that local environmental features contribute to a good level of air quality.

Heritage and design

- 2.30 A considerable amount of land within the eastern portion of the Neighbourhood Plan Area is designated a Site of Special Archaeological

Significance. This designation recognises the potential for this area to contain archaeological remains.

- 2.31 There is only one statutory Listed Building in the WFNP Area, the Grade II Listed Cedar Court. LB Barnet retains a list of buildings within the borough that it considers to have local architectural or historic interest. In the WFNP Area locally listed assets are Fursby House (on Nether Street) and the West Finchley Underground Station footbridge.
- 2.32 The WFNP Area is typified by high quality, inter-war semi-detached housing. While the scale and massing of this housing is quite homogenous, usually comprising two storeys plus roof space, the architectural detailing varies considerably throughout the Neighbourhood Plan Area.
- 2.33 Over the years, certain types of alteration to existing houses have included roof extensions and conversions, rear extensions, conversion of front gardens to off-street parking and limited basement-level works.



WEST FINCHLEY NEIGHBOURHOOD FORUM

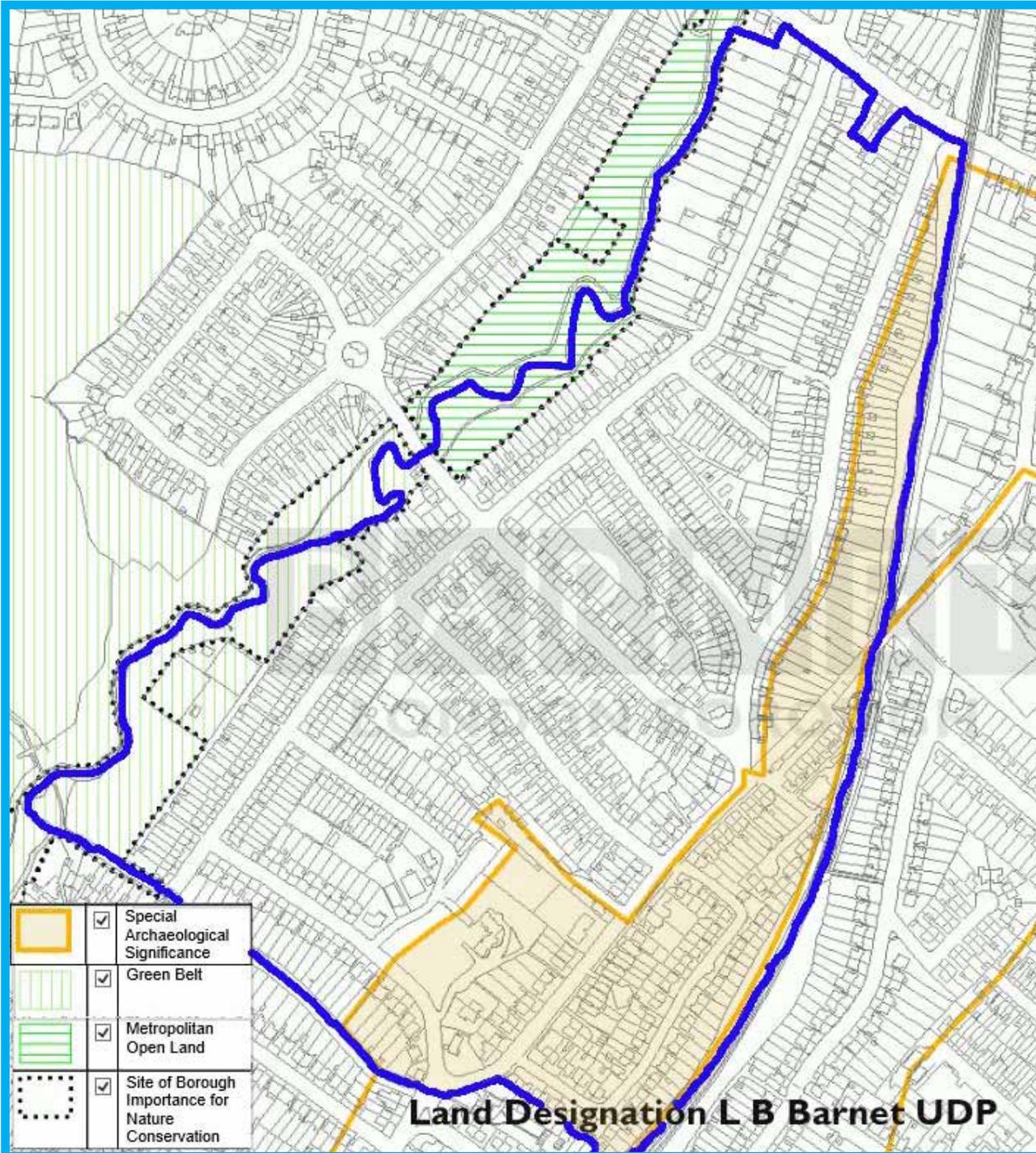


Figure 2.1: Site of Borough Importance for Nature

3.0 Planning Policy Context

3.1 The planning policy framework in England comprises three spatial tiers at national, local and neighbourhood level. The expectation is that with each tier the level of detail should increase. In London, an intermediate tier is added between national and local policy, which is policy prepared by the Greater London Authority.

3.2 Planning law requires decisions on planning applications to be made in accordance with the Development Plan, unless 'other material considerations' indicate otherwise. National Policy is not part of the Development Plan, but is an important other material consideration and sets a template for the preparation of Development Plan Documents. In addition, many authorities prepare guidance documents such as Supplementary Planning Documents that expand on the intention of Development Plan Policies and form part of the Development Plan. In addition there are a range of other material considerations to the determination of planning applications that are afforded different weight. The West Finchley Neighbourhood Plan Design Guide (Supporting Document B) is an example of another material consideration. Other material considerations are not simply limited to national policy and guidance documents and may include a range of information. There is no set list of what can be another material consideration.

3.3 Authorities are expected to regularly review and update Development Plan Documents. Therefore, at any given time it is likely that there will be a number of "emerging" documents. Authorities are allowed to give emerging documents some weight in decision making prior to adoption, but only once draft policies are refined and clearly supported with evidence.

3.4 Table 1 sets out the current and emerging Development Plan Documents and most relevant other material considerations in relation to the emerging West Finchley Neighbourhood Plan. Development Plan Documents (including emerging documents) are **bold**.

3.5 The Neighbourhood Plan seeks to fit within the existing planning policy framework set out in this theme. This ensures the Neighbourhood Plan is in accordance with the strategic policies of the London Plan and LB Barnet Development Plan and also allows it to be focused, resisting any unnecessary duplication of policies contained in other Development Plan Documents. Therefore, to understand the role of the Neighbourhood Plan it should be read alongside the other Development Plan Documents to which it adds detail.

3.6 The Baseline Report contains a wider review of the documents identified in Table 1 and how the West Finchley Neighbourhood Plan Area fits into this document, highlighting strategic policies to which it must be in general conformity.



Table 1: Development Plan Documents and Material Considerations

Title	Purpose of the document	Date of adoption/ emerging timeline
National Planning Policy and Guidance		
National Planning Policy Framework (NPPF)	The NPPF is the overarching planning policy framework in England. It sets out a broad agenda for decision taking and plan making.	Latest version adopted in February 2019.
National Planning Practice Guidance (NPPG)	NPPG supports the NPPF with more detailed guidance, responding frequently to developments in the planning system.	The Government frequently updates the NPPG.
Regional - Greater London Authority (GLA) Planning Policy and Guidance		
The London Plan (London Plan)	The London Plan is a strategic statutory planning policy document that covers all 32 London Boroughs and the City of London, with shared responsibility between those local authorities and the Mayor of London.	Latest version adopted in 2021
London Plan Supplementary Planning Guidance (SPGs)	<p>A number of SPGs add detail to the London Plan, some of which may contain content of relevance to the WFNP. These include:</p> <ul style="list-style-type: none"> • Housing; • Social Infrastructure; • Accessible London: achieving an inclusive environment; • Character and context; • Sustainable design and construction; and • Planning for equality and diversity in London 	<p>2016</p> <p>2015</p> <p>2014</p> <p>2014</p> <p>2014</p> <p>2007</p>
Local - London Borough of Barnet (LB Barnet) Planning Policy and Guidance		
Core Strategy Development Plan Document ('Core Strategy')	The Core Strategy sets out the long-term spatial vision for Barnet.	2012

Title	Purpose of the document	Date of adoption/ emerging timeline
Development Management Policies Development Plan Document ('DMPD')	The DMPD sets out detailed development management policies in LB Barnet. It adds detail to the Core Strategy.	2012
Residential Design Guidance SPD	Specific guidance in relation to the design of residential development.	2016
Sustainable Design and Construction SPD	Specific guidance in relation to sustainable development and construction in development.	2016
Green Infrastructure SPD	Guidance relating to capacity for green infrastructure to deliver benefits to local communities	2017
Emerging LB Barnet Local Plan	This will replace both the Core Strategy and DMPD to provide a new planning policy framework for LB Barnet from 2021 (base year for monitoring) to 2036.	The latest timeline for production is set out in the LB Barnet Local Development Scheme (2018). A draft of the Local Plan was consulted on between 27th January and 16th March 2020.
Neighbourhood – West Finchley Neighbourhood Plan and Guidance		
West Finchley Neighbourhood Plan (this document)	To add distinct local policies to the existing policies of the Development Plan.	Made June 2021.

4.0 Overall Vision

The West Finchley Neighbourhood Plan will support the sustainable development of the neighbourhood to 2035. The key assets of the area will be retained and new development will have improved the character and sustainability of our area.

4.1 The Overall Vision provides a simple mission statement for the Neighbourhood Plan, supporting positive developments that will improve the Neighbourhood Plan Area through to 2035.

Key Themes

4.2 To deliver the Overall Vision, a number of Key Themes are identified, which form the themes of the Neighbourhood Plan. The themes are detailed below with some brief information on the content of each theme:

- 1. Residential Development** – this theme concerns all aspects of residential development, which is the dominant type of development in the Neighbourhood Plan Area. It works alongside the streetscape theme to support high quality design in the Neighbourhood Plan Area.
- 2. Amenities** – this theme relates to the identification, protection and enhancement of amenities in the Neighbourhood Plan Area, including shops, green spaces and community facilities.
- 3. Streetscape** – this theme addresses the public realm in the Neighbourhood Plan Area, seeking opportunities to improve the streetscapes.

- 4. Local Environment** – this theme concerns our local environment, considering how to manage and improve the local environment, addressing issues such as flood risk and air quality.
- 5. Transport** – this theme relates to the improvement of travel within and through the Neighbourhood Plan Area.

5.0 Residential Development

- 5.1 Residential housing is the primary land use within the Neighbourhood Plan Area. The area has a dominance of semi-detached style housing, more so than the wider LB Barnet, London and England (Figure 15 of Baseline Study). The area also has a population density that is higher than LB Barnet, London and England, further indicating that housing is the primary land use in the area. There is an identified need for family housing in the area, and the costs of housing within the West Finchley and surrounding areas indicates there is unmet demand.
- 5.2 We therefore wish to make sure that future residential development, whether new or replacement, is in keeping with the existing character of the area, whilst providing for the needs of the local community. Further information regarding the residential population and housing can be found in Chapter 4 and Chapter 5 of the Baseline Study (Evidence Base Document C).
- 5.3 The Neighbourhood Plan has not allocated sites specific for housing development. This does not mean that the Neighbourhood Plan restricts development. Where new development is proposed, this should be of a design that complements the existing character and form.

VISION

Where proposals for new housing developments arise, we wish to make sure the resulting homes are high quality, in keeping with the character of the area and do not negatively affect the amenity of neighbours. We also wish to see alterations to existing homes that are sympathetic to the character of the area.

OBJECTIVES

1. **To ensure that the design of residential development, whether in the form of new homes or alterations to existing ones, is appropriate in the context of the neighbourhood, including its density, scale, massing and architecture.**
2. **To promote an appropriate mix of housing types, whilst also protecting family homes from subdivision to small flats and preventing the unnecessary demolition of houses to construct blocks of flats.**
3. **To encourage use of sustainable materials, construction methods and support low-carbon development.**
4. **To manage residential development to prevent the possibility of damaging environmental impacts, especially to biodiversity and flood risk.**
5. **To minimise disruption to residents during construction.**

Policy RD1 – Utilising the Neighbourhood Plan Design Guide

5.4 National planning policies enable neighbourhood plans to develop robust and comprehensive policies that set out the quality of development that is expected for the area. In this regard, Supporting Document B – Neighbourhood Plan Design Guide, sets out the expectations for development that is the subject of a planning application.

Policy RD1: Proposals involving new or enlarged residential properties, or alterations to the exterior of buildings of a scale which require planning permission, should be designed to reflect the prevailing local character and should not disrupt the street scene. All proposals should seek to demonstrate how regard has been had to the Neighbourhood Plan Design Guide.

5.5 A Design Guide has been prepared by Nexus Planning, based on evidence set out in the Heritage and Character Assessment (HCA), and Evidence Base and Policy Development Report (EBPD) both prepared by AECOM. We expect the use of this by anyone seeking to provide new or altered residential development in West Finchley through a formal planning application. Under circumstances where development benefits from permitted development rights and therefore is not required to submit a planning application to the LB Barnet, the design of that development should have regard to the Design Guide wherever possible.

Policy RD2 – Secure Homes

5.6 As with many suburban areas of London, the West Finchley Neighbourhood Plan Area experiences burglaries with some regularity, as identified in Chapter 12 the Baseline Report using Metropolitan Police statistics. Well-designed

homes can discourage burglary attempts and reduce the success of burglaries, not simply to the subject property but to the wider area in general. Conversely, poorly designed properties can attract criminals and have knock-on implications for the wider area.

Policy RD2: Proposals involving alterations to existing homes should at least maintain the existing level of security and, where possible, should incorporate measures to increase security for existing residents (including neighbours).

Proposals involving the creation of new dwellings should seek advice from LB Barnet and/or the Metropolitan Police regarding designing out crime with the ambition of achieving a development that is regarded secured by design.

- 5.7 Further information in relation to Secured by Design may be found at www.securedbydesign.com. Reference should also be made to Chapter 6 of Supporting Document B – West Finchley Neighbourhood Plan Design Guide.
- 5.8 Security measures that should be considered include:
1. careful layout of residential buildings, allowing for passive surveillance of areas accessible from public highways, particularly entrances to properties;
 2. secure storage of bicycles, preferably in secure storage sheds (particularly in the case of flatted development);
 3. secure rear gardens;
 4. use of high quality secure doors and windows;
 5. appropriate lighting around properties;
 6. burglar alarms; and
 7. fences and boundary walls

Policy RD3 – Layout of New Residential Development

5.9 The Neighbourhood Plan is supported by a Heritage and Character Assessment, which sets out the established character of the Neighbourhood Plan Area. This includes a number of examples that show the role of verges and alleyways between properties as integral to the area's 'semi-rural' feel, which was something residents who responded to the first engagement exercise said that they valued. The purpose of Policy RD3 is to ensure that future residential development continues to reflect the layout of residential streets including the historic alleyways and verges. Reference should also be made to Chapter 4 of the West Finchley Neighbourhood Plan Design Guide.

Policy RD3: Proposals involving the redevelopment of existing sites in residential use should respect the current layout of residential streets. In particular, historic alleyways and verges should be maintained unless in exceptional circumstances, where the application improves on current layouts.

5.10 The Neighbourhood Plan Design Guide provides further detail on the layout of new residential development.

5.11 Most homes in the Neighbourhood Plan Area were built with a front and back garden, as identified in the Heritage and Character Assessment. Over the years, many residents have chosen to convert front gardens to driveways. The Heritage and Character Assessment identifies that front gardens are beneficial to the character of the area (Section 5.1), which is harmed to an extent when driveways are created.

5.12 New front driveways can be constructed under permitted development rights, but the Neighbourhood Plan supports well-designed driveways that do not increase run-off, and thereby reduce flood risk, through use of permeable materials (such as gravel or permeable paving) and retain an element of planting. This reduces surface-water run-off rates in the Neighbourhood Plan Area. Planting has an additional benefit of reducing the impact of new driveways on the character of the Neighbourhood Plan Area. The Neighbourhood Plan Design Guide provides further detail on the layout of new residential development, including for driveways and planting. It is recommended reading for all those proposing alterations to front driveways.

Policy RD4 – Basement Developments

5.13 This policy applies to all new basement development within the Neighbourhood Plan Area. Basement development is defined as the construction or extension of one or more storey of development below the prevailing ground level. This policy also applies to the development of 'sub basements', whereby excavation is limited to levelling off a slope beneath the prevailing ground level.

5.14 Basement development is becoming increasingly popular across London. As a result there is some concern amongst local residents regarding the impact of basement developments on local water tables, ground stability and the potential for poorly managed basement development to have a negative impact on neighbouring properties. Further information around ground conditions and underground water courses is provided in Chapter 10 of the Baseline Report.

5.15 In 2016 a Finchley home collapsed following the excavation of a basement (Goldswine and Hale, 2016). The Department of Communities and Local Government published a Call for Evidence for Basement Development and the

Planning System in November 2016. The summary of responses, which was published in December 2017, confirmed that issues had been raised regarding how basement development was being managed, and confirmed that local planning authorities should consider the introduction of local plan policies and Article 4 directions to control basement development. The adopted Local Plan for LB Barnet does not include a policy that controls basement development. The Barnet Draft New Local Plan, however, contains Policy CDH06 which sets out design principles for proposals for basements. It refers to the LB Barnet Residential Design Guidance and Sustainable Design and Construction SPDs, which should also be followed when basement development is proposed.

5.16 The Neighbourhood Plan Area is likely to be at risk from the impacts of basement development for a combination of reasons including high population density, high proportion of semi-detached and terraced housing, a complex geology and numerous underground watercourses. Policy RD5 sets out the Neighbourhood Plan requirements for any development that incorporates a basement as defined above. The measures are included to make sure that any such development would not put the host dwelling or any neighbouring dwellings at risk.

5.17 Thames Water advises that basement developments should incorporate devices to prevent sewage backflows and flooding. This is because the wastewater network may surcharge to ground level during storm conditions. Such measures are required to comply with the NPPF, which highlights the need to avoid flooding, and also in the interests of good planning practice, as recognised in Part H of the Building Regulations.



RD4: Basement development should be subtly integrated into buildings, and:

- a. should be limited to excavation that 'levels off' a slope to create an additional storey at the rear of the property only;**
- b. should not result in a large increases in built footprint; and**
- c. should be mostly invisible from the front of properties**

Proposals for basement developments must:

- a. Be of reasonable proportion in comparison to the subject dwelling, covering less than 50% of the existing building footprint and of no more than one storey;**
- b. Have an acceptable impact on the character of the West Finchley area, retaining the traditional appearance of properties when viewed from street level;**
- c. Be supported by appropriate evidence that there would be no adverse effect on neighbouring ground water or local ground conditions. All basement development should incorporate a positive pumped device or other suitable flood prevention device to avoid the risk of sewage backflows which can cause sewer flooding.**
- d. Include proportionate Sustainable Drainage Systems that would mitigate impact on surface water flood risk.**
- e. Provide details of construction, especially noise levels and times, to ensure minimal disruption to neighbours.**



WEST FINCHLEY

NEIGHBOURHOOD FORUM



6.0 Amenities

- 6.1 The residential population of West Finchley have access to a range of public amenities including shops, open spaces and leisure and community facilities. It is important therefore, that these facilities are protected and continued to be utilised, and are not lost unnecessarily. In reading these policies, reference should be made to Chapter 9 of the Baseline Report.

VISION

Shops, open space, leisure and community facilities will continue to operate and improve during and beyond the plan period, supporting the continued development of our community.

OBJECTIVES

- 1. To provide amenities that meet the needs of our diverse community, including people of all ages, ethnic backgrounds and those with disabilities.**
- 2. To encourage a quality retail offer along Nether Street that generates the footfall needed to remain viable and meet the needs of local residents.**
- 3. To protect and enhance local green spaces, including informal spaces and allotments, for walkers, games, fitness activities and other recreation as well as to support local wildlife and air quality.**
- 4. To identify and protect important leisure and community venues in the Neighbourhood Plan area.**
- 5. To encourage access to healthcare, childcare and education resources within walking distance of the area.**



Policy A1 – Local Parade of Shops

6.2 The small parade of shops (nine units) on Nether Street has the potential to provide a selection of local convenience and service-orientated retail options to local residents. This is particularly useful in a community with an ageing population that is separated from the nearest larger shopping area, in Finchley along Ballards Lane, by a 10-15 minute walk along uphill streets. Given this context, residents would certainly support further growth in the number of service-orientated shops, such as pharmacies and a Post Office, an issue that has frequently been mentioned in engagement exercises.

current shopfronts are in a state of some disrepair, so proposals to improve the shopfronts would be supported. The Neighbourhood Plan Design Guide includes some guidance in relation to shopfront design that should be followed when improving shopfronts.

Policy A2 – Community Facilities

6.4 Community facilities are an important aspect of any neighbourhood, giving local residents and residents from further afield, the opportunity to hire and utilise the facilities that are offered. The purpose of Policy A2 is to ensure that local community facilities are protected.

Policy A1: The row of shops on Nether Street, as shown on Figure 6.1, an important local community asset. Change of use to non E Class uses in the retail units along the parade will be resisted unless evidence of no viable demand for the unit, based on continuous marketing over a 12 month period, can be demonstrated.

In the units of the local parade of shops, the following proposals are encouraged:

- a. The change of use to a service-orientated use accessible to local people, such as a pharmacy; and**
- b. Appropriate improvements to shopfronts and signage that would improve the appearance of the Local Parade of Shops.**

6.3 From 1st September 2020, Government changes to the Use Classes Order came into effect. A new Class E (Commercial, business and service) will combine the following use classes: shops (A1); financial/professional (A2); cafes/restaurants (A3); indoor sport/fitness (D2 part); medical health facilities and crèche/nurseries (D1 part) and office/business use (B1). Policy TOW02 of the emerging Barnet Draft Local Plan which aims to protect retail uses unless specific criteria are met is also relevant to the future of the shopping parade. Many of the

Policy A2: The following sites, identified at Figure 6.2, are identified as community facilities by the Neighbourhood Plan:

- 1. Gordon Hall; and**
- 2. Finchley Lawn Tennis Club**

Loss of these community facilities would not be supported unless in exceptional circumstances, for example where a new improved community facility would replace the existing use.

Subject to compliance with other policies of the Development Plan, proposals involving the creation of new community facilities intended for the use of local residents are supported.

6.5 Gordon Hall and Finchley Lawn Tennis Club, along with the Local Green Spaces identified by Policy A3, are key community facilities in the Neighbourhood Plan Area. Each support the development of a local community and provide a space for leisure activities. Both the Gordon Hall and the Tennis Club are very well utilised by residents of the Neighbourhood Plan Area and those who live further afield. The loss of these facilities would be detrimental to the local community unless in exceptional circumstances, where a proposed new use would actually provide improved community facilities. (See 2.22 above for details of usage of these premises.)

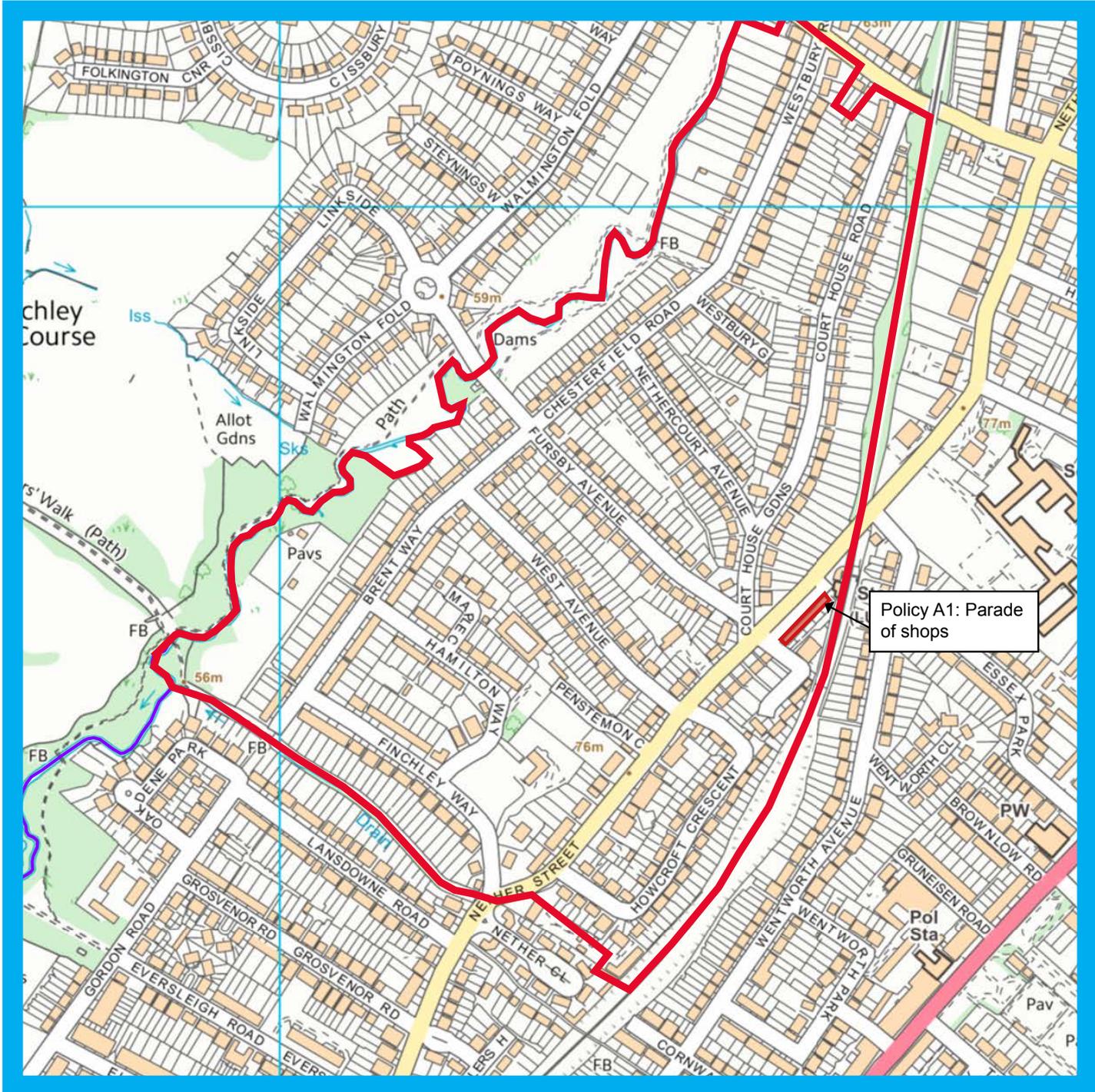


Figure 6.1: Local Parade of Shops



WEST FINCHLEY NEIGHBOURHOOD FORUM

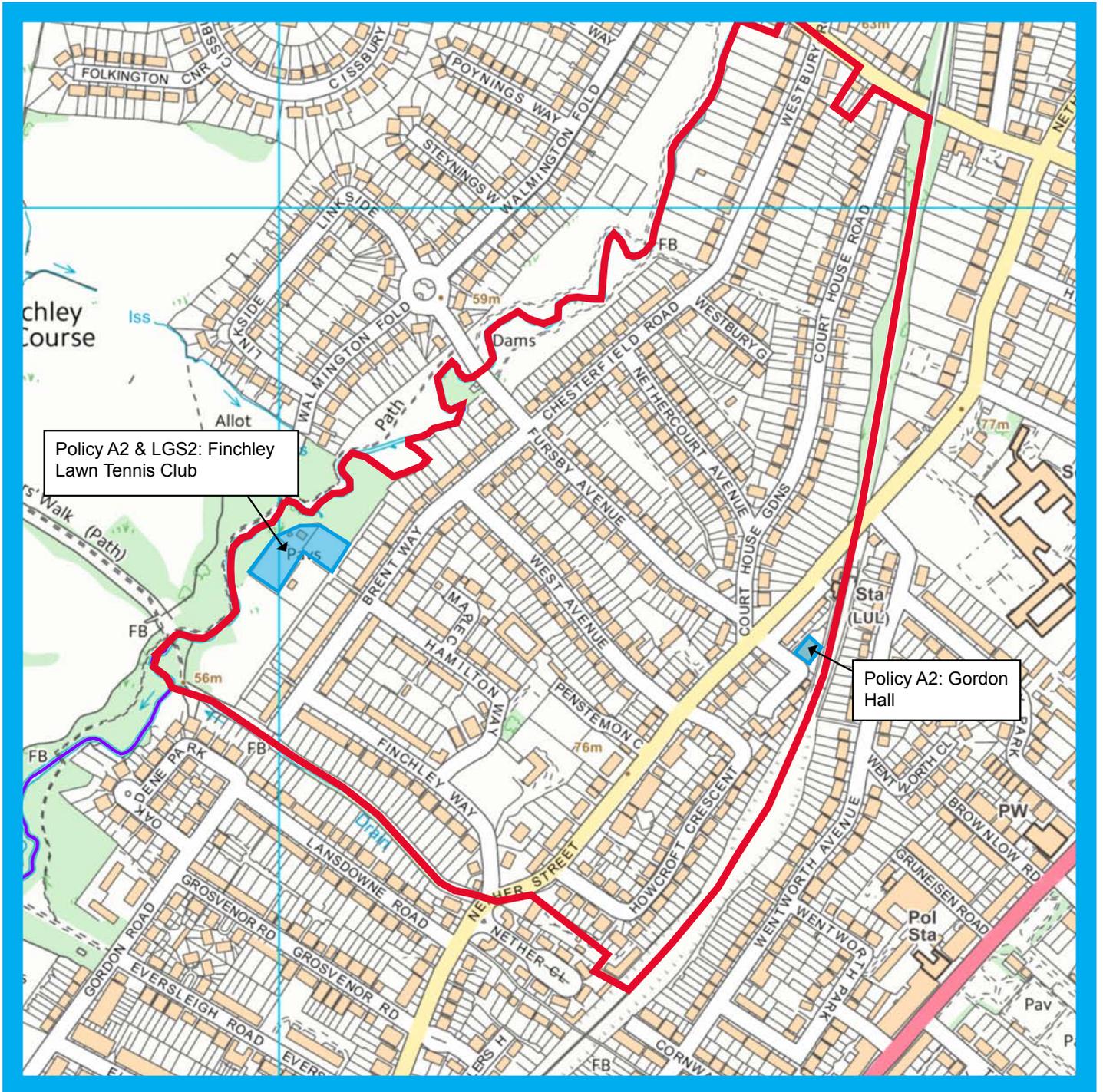


Figure 6.2: Community Facilities

Policy A3 – Local Green Spaces

- 6.6. National planning policy (Paragraphs 99 and 100 of the National Planning Policy Framework) allows neighbourhood plans to designate land as Local Green Space where the green space is:
- in reasonably close proximity to the community it serves;
 - demonstrably special to a local community; and
 - local in character and not extensive.
- 6.7 Evidence Base Document D (Local Green Spaces Designation Paper) sets out justification for the designation of the Local Green Spaces included in Policy A3 in accordance with the requirements set out in the National Planning Policy Framework. Six Local Green Spaces have been designated as part of the Neighbourhood Plan set out in Policy A3.

Policy A3: The following areas are designated as Local Green Spaces as shown on Figure 6.3:

LGS1 Former grounds of Brent Lodge¹.

LGS2 Dollis Valley Greenwalk.

LGS3 Nethercourt Avenue Allotments.

LGS4 Brent Way Allotments.

LGS5 West Finchley Station Parade & Nether Street Grass Verges

In accordance with the National Planning Policy Framework, development of these sites would only be acceptable in very special circumstances.

¹ It is bounded by Finchley Way, the unadopted section of Hamilton Way, the side of No. 33 Hamilton Way, Penstemon Close, the carpark of Chilvins Court (172 Nether Street) and The Drive. It surrounds the gardens of Cedar Court, a Grade II listed block of flats on three sides.

Policy A4 – Improvements to Local Green Spaces

- 6.9 The Neighbourhood Plan supports appropriate proposals to improve the Local Green Spaces. In particular, proposals to improve the former grounds of Brent Lodge Local Green Space would

be supported to enhance its role as an important green space within the Neighbourhood Plan Area.

Policy A4: Appropriate proposals for improvements to Local Green Spaces that enhance their role would be supported.

Policy A5 – Utilities Infrastructure

- 6.10 Good utilities infrastructure is crucial to the quality of life of new and existing residents. Policy A5 puts a reasonable expectation on developers to engage with the relevant authorities at the outset of a planning application, ensuring that capacity is not adversely impacted. For example, developers need to consider the net increase in water and waste water demand to serve their developments, and also any impact the development may have off-site further down the network, if no/low water pressure and internal/external flooding of property is to be avoided. Thames Water encourages developers to use its free pre-planning service. <https://www.thameswater.co.uk/preplanning> This service will tell developers at an early stage if there will be capacity in the water and/or wastewater networks to serve their development, and what can be done if not. This enables Thames Water to serve new development at the point of need and speed up the delivery of new development.

Policy A5: Subject to compliance with other policies of the Development Plan, proposals resulting in the improvement of local utilities infrastructure, including gas, water, electricity, broadband, public Wi-Fi and mobile phone reception would be supported.

Major development proposals should be supported by robust evidence of capacity within the existing utilities network (for water, sewage, electricity, gas and broadband) to accommodate the proposed development without a negative impact on existing residents and users. This should be in the form of confirmation from the relevant authority.



WEST FINCHLEY NEIGHBOURHOOD FORUM

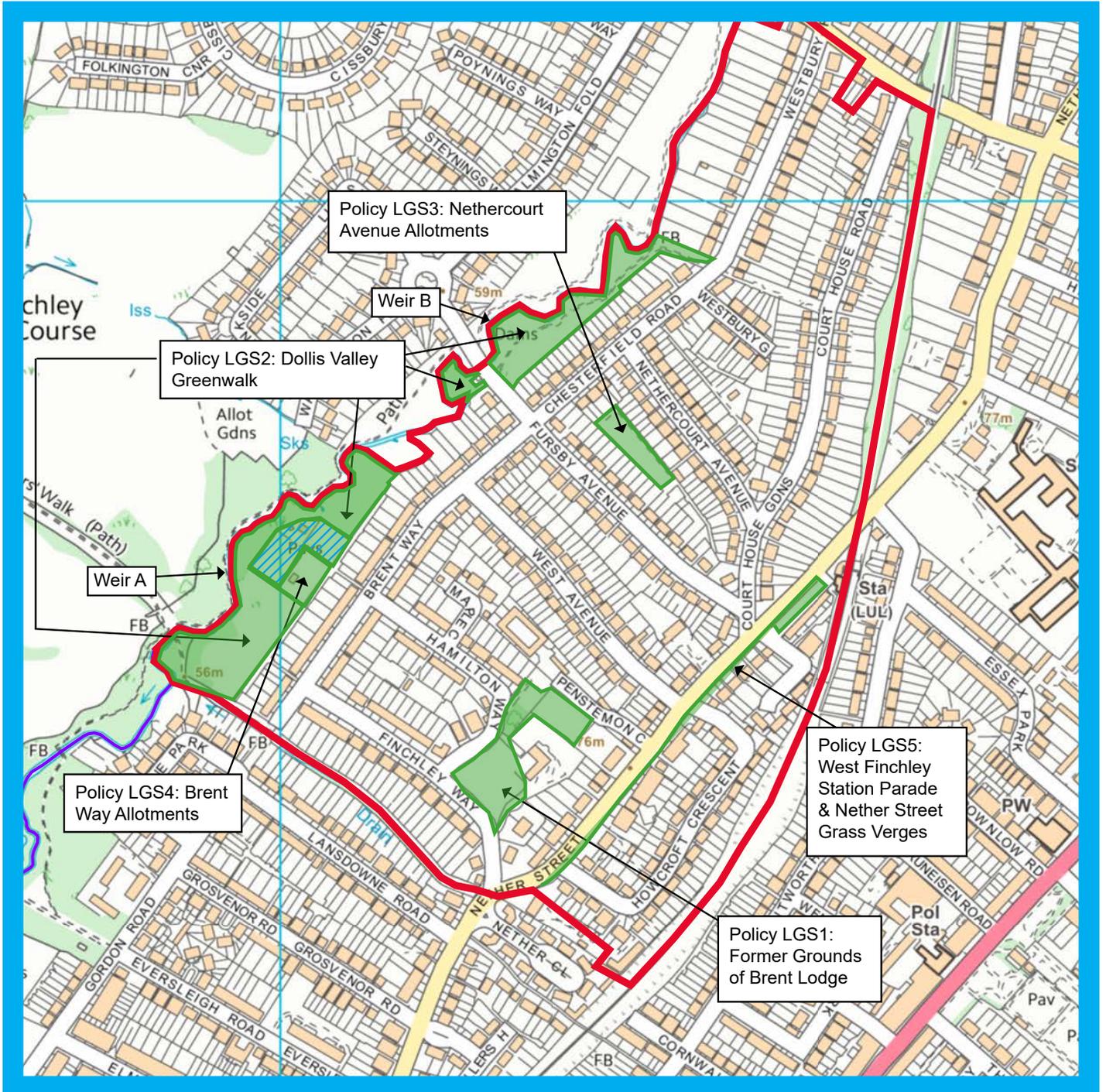


Figure 6.3: Local Green Spaces

7.0 Streetscape

- 7.1 Well-designed streets can contribute to making neighbourhoods safer, healthier and greener. The West Finchley Neighbourhood Forum welcomes the opportunity to contribute to making London a safer place by incorporating policies that enhance the streetscape and local environment, protect local character and heritage, and improve urban design.

VISION

The streetscape in West Finchley is enhanced over the next 15 years through high quality landscaping schemes. New development over the next 15 years will be conscious of the potential threat of crime and will be designed to prevent it.

OBJECTIVES

1. To promote the use of good design in order to reduce opportunities for crime and increase the safety of residents, pedestrians and other road users.
2. To seek opportunities to improve street furniture, pavements and other features.



Policy S1 – Local Character and Heritage

- 7.2 It is important that all development in the Neighbourhood Plan Area, not just residential development, makes a positive contribution to the character of the area. This is particularly pertinent in the public realm, where the Heritage and Character Assessment identifies many negative features, such as inconsistent street signs, poor quality pavements and paths, tree stumps and areas where street trees have been removed but pavements not appropriately repaired or the tree replaced.

Policy S1: New developments that affect the streetscene, including in the public realm, to front gardens or to the exterior of non-residential buildings, should have regard to and complement the positive aspects of character in the Neighbourhood Plan Area, as set out in the Heritage and Character Assessment and highlighted in the Neighbourhood Plan Design Guide.

Where possible, proposals must conserve or enhance the setting of heritage assets within the Neighbourhood Plan Area. Proposals affecting the fabric or setting of any nationally or locally listed heritage assets in the Neighbourhood Plan Area, as identified in Section 4.2.4 of the Heritage and Character Assessment, must be supported by a proportionate assessment of the impact on the significance of the heritage asset and an outline of the public benefits of the proposals. Proposals that would result in a negative impact to the significance of a heritage asset without an adequate public benefit to counterbalance that impact would not be supported.

- 7.3 The Heritage and Character Assessment identifies the following nationally and locally listed heritage assets in the Neighbourhood Plan Area (Section 4.2.4):

- Cedar Court (Grade II Listed);
- Fursby House (Locally Listed by LB Barnet); and
- West Finchley Underground Railway Footbridge (Locally Listed by LB Barnet).

Reference should be made to any update to Barnet's Local List of Heritage Assets.

- 7.4 The HCA further identifies that 82-84 Westbury Road is considered to be of historic interest and positively contributes to the local distinctiveness of the area. Additionally, 200 Nether Street (shown below) is under consideration for local listing as it was the gatehouse to the now demolished Brent Lodge.
- 7.5 Policy S1 is consistent with national policy as it seeks the public benefits of a proposal affecting a heritage asset to be 'weighed up' against the level of harm to that asset. This policy focuses on locally listed heritage assets.

Policy S2 – Public Realm Improvements

- 7.6 Policy S2 sets out a number of desirable features that would improve the public realm, many of which are referenced in the Heritage and Character Assessment, or would address negative features identified in that document (refer paragraph 4.2.5).

Policy S2: Proposals involving the following public realm improvements would be supported:

- a. Replacement of road naming plates with 'old style' naming plates appropriate to the 1920s and 1930s when most of the properties in the area were built;**
- b. Provision of new planters in appropriate locations where a future maintenance plan can be demonstrated and they would not adversely affect the movement of pedestrians or cyclists;**

- c. Planting of new trees in appropriate locations;**
- d. Improvements to pavements and roads, taking account of original styles wherever possible;**
- e. Where it would not have an adverse impact on the movement of pedestrians and cyclists, an increase in the number of litter bins, especially around the parks and open spaces and replacement of existing litter bins all to be of high quality and hygienic "smart" litter bins; and**
- f. Improvements to the junction of Nether Street and Courthouse Gardens where they do not adversely affect local bus routes.**

- 7.7 The Neighbourhood Plan Design Guide contains further guidance on how Policy S2 can be delivered.



200 Nether Street c.1906

8.0 Local Environment

- 8.1 Maintaining an enjoyable, healthy and safe local environment is of the utmost importance to the West Finchley Neighbourhood Forum. At the heart of environmental issues are flooding and air quality. The London Plan partly addresses these issues through the Healthy Streets Approach and the Mayor's Transport Strategy. This section of the Neighbourhood Plan addresses these issues by incorporating policies for flood risk, trees and air quality. The evidence base for policies in this section can be found at Chapter 11 of the Baseline Report.

VISION

To maintain and enhance the green areas and to ensure that matters such as flood risk and air quality will be considered alongside planning applications.

OBJECTIVES

1. To identify opportunities of benefit to the local environment, including in terms of flood risk and air quality.
2. To protect and maintain trees and other vegetation and areas of green space and to actively support appropriate urban greening in the neighbourhood to enhance the local ecosystem and support wildlife.

Policy LE1 – Dollis Valley Greenwalk Flood Risk

- 8.2 There is some identified flood risk in the Dollis Valley Greenwalk area, as set out in Chapter 11 of the Baseline Report. Proposals that would alleviate this flood risk without displacing this flood risk to elsewhere or damaging the appearance or ecological value of the Greenwalk would be supported.

Policy LE1: Proposals that would reduce the amount of flood risk in the Dollis Valley Greenwalk would be supported provided there would be no significant damage to biodiversity or the enjoyment of the Dollis Valley Greenwalk. Proposals for development should contribute to, and enhance, the natural and local environment by minimising impacts on, and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; and preventing the unacceptable risk or occurrence of soil, air, water or noise pollution, or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Where major development is proposed, in order to protect and enhance biodiversity and geodiversity, plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks; wildlife corridors and stepping-stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and promote the conservation, restoration and enhancement of priority habitats, ecological networks and priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.



WEST FINCHLEY NEIGHBOURHOOD FORUM

- 8.3 In responding to this policy, regard should be had for the Paragraphs 155-161 of the National Planning Policy Framework and Planning Practice Guidance (PPG). Table 3 of the PPG sets out the types of development appropriate to each flood zone. Only 'water compatible' development types are appropriate in the functional floodplain.
- 8.4 The Environment Agency has advised that Water Framework Directive action measures for the area of the Dollis Brook located within the Neighbourhood Plan Area would include:
- Install rock ramp fish pass (or suitable alternative) for weir at Finchley Lawn Tennis Club (shown on Supporting Document A Proposals Map as Weir A);
 - Remove unnecessary wooden toe boarding and hard revetment and introduce gravel riffles where appropriate along 1.2 km of Dollis Brook from Fursby Avenue through Oakdene Park to the railway viaduct (Dollis Road)(only partially within the Neighbourhood Plan area); and
 - Fish easement for weir at Fursby Avenue (shown on Supporting Document A Proposals Map as Weir B).

These proposals are considered to improve the biodiversity and water quality of the Dollis Brook. Other proposals that can demonstrate that they would result in improved water quality and biodiversity would also be supported.

The National Planning Policy Framework states that planning policies and decisions should protect and enhance valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the

most versatile agricultural land, and of trees and woodland.

Policy LE2 – Trees

- 8.5 The Baseline Report (Chapter 10) includes details of a tree audit that shows a significant number of trees along streets have been felled in the Neighbourhood Plan Area in recent years; not all have yet been replaced. The Heritage and Character Assessment identifies the importance of trees to the character of the Neighbourhood Plan Area (Section 5.1). In addition, evidence shows the value trees can have from an amenity, environmental and ecological perspectives. In addition to Policy LE2, regard should also be had for LB Barnet's Tree Policy 2017 and the Green Infrastructure SPD.

Policy LE2: Proposals should seek to protect trees and avoid removal where possible. In particular, ancient, veteran and mature trees or trees and hedgerows of ecological, arboricultural or amenity value should be retained.

Where trees must be lost as a result of development, or for safety reasons, these must be replaced at a ratio of at least 1:1 within the vicinity of the lost tree, with a preference for native trees and for fruit and nut trees in keeping with those already in the area. The responsible planting of additional trees that reduce or absorb air pollution from traffic and/or have the potential to provide habitats will be supported throughout the Neighbourhood Plan Area, to accord with Mayor of London's policy on increasing tree numbers.

8.6 Given the loss of trees in the Neighbourhood Plan Area and the fact that trees can improve air quality, we consider that the expectations of policy LE2 are more than reasonable. Seeking to retain valuable trees in the first instance and, in situations where that is not feasible, ensuring adequate replacement assists with maintaining the green nature of the area. Moreover, the greening of an area can have a positive impact on the mental health of residents. In general, tree planting in areas where they are currently lacking is encouraged.

Policy LE3 – Air Quality

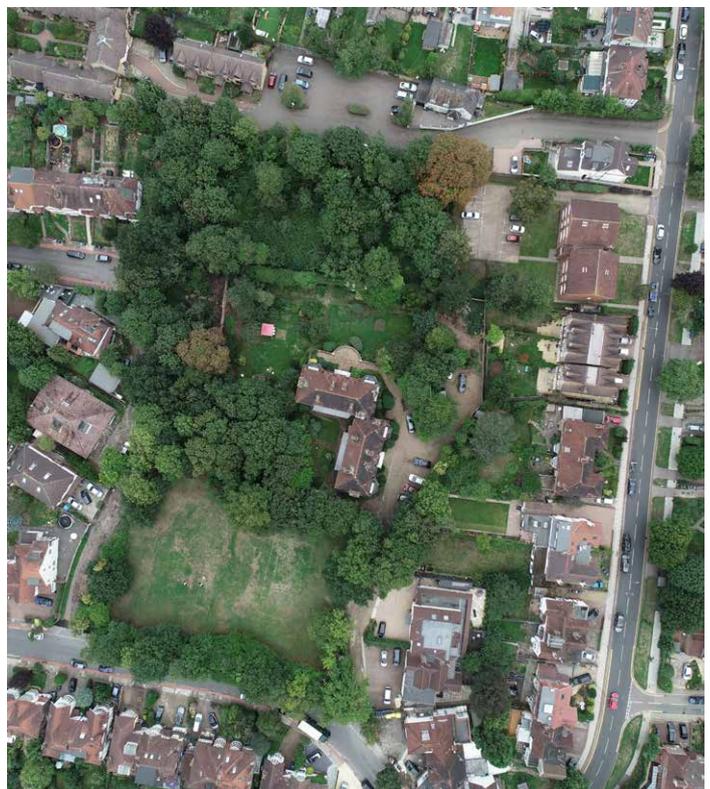
8.7 The Baseline Report identifies West Finchley Neighbourhood Plan Area as forming part of an Air Quality Management Area. Therefore, it is important that proposals do not worsen air quality and where possible improve air quality across the Neighbourhood Plan Area.

Policy LE3: Proposals should not result in a reduction in air quality within the Neighbourhood Plan Area. Where possible, measures to improve air quality should be included, such as features that absorb poor air or measures that reduce emissions. Similarly, proposals that reduce the number of car trips (such as car clubs) and that encourage active travel (e.g. walking, cycling and using scooters), will be supported.

8.8 London's Healthy Streets Approach as addressed in draft London Plan Policy T2 provides a platform for improving air quality, reducing congestion and helping to make London's diverse communities greener and more attractive. The London Plan has also made a commitment to ensure that Good Growth occurs within London. This includes directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking and cycling network.

8.9 Development proposals that would result in a reduction in the number of car trips would be supported. For example, development proposals that involve provision of car clubs should be encouraged. Similarly, improvements to walking and cycling infrastructure should be supported to encourage the use of active transport measures including walking, cycling and scooters.

8.10 Notwithstanding the desire to reduce the overall number of car trips made in the Neighbourhood Plan Area, the Forum is conscious that mobility issues can make it difficult for some residents to reduce the number of car trips. Programmes such as 'dial-a-ride' will continue to be supported in instances such as this.





9.0 Transport

9.1 Transport for London's 'Vision Zero for London' is a programme designed to eradicate deaths and serious injuries from London's roads to make the city a safer place for all. The Vision Zero Action Plan¹ sets out how the ambitious programme can do so, through safe streets, speeds, vehicles and behaviours. Similarly, these issues are addressed in the draft London Plan's Healthy Streets Approach, the Good Growth Initiative and the Mayor's Transport Strategy. The Neighbourhood Plan has set out in this section, policies that aim to address the Vision Zero aspirations. In reading this section of the Neighbourhood Plan, reference should be made to Chapter 8 of the Baseline Report.

VISION

We want our area to help all residents to travel to and from their homes safely, efficiently and sustainably.

OBJECTIVES

1. To seek opportunities to improve public transport accessibility for all residents, including elderly, disabled and young residents.
2. To support proposals that improve our pavements and pathways, making them safer and accessible to all.
3. To support proposals that promote responsible cycling in the Neighbourhood Plan area, while ensuring that other users of shared paths and roads are protected.
4. To ensure that residents are able to park cars on the street conveniently and to support proposals that reduce the impact of commuter parking and thereby the pressure to pave front gardens, thus reducing the impact of hard landscaping.

5. To support any appropriate upgrades to West Finchley Underground Station.
6. To support any appropriate upgrades to bus routes and services that result in an increase in accessibility for local residents.
7. To ensure attractive street environments that prioritise people rather than cars, and are safe and well designed for all road users.



¹ <https://tfl.gov.uk/corporate/safety-and-security/road-safety/vision-zero-for-london>

Policy T1 – Electric Charging Points

- 9.2 Electric vehicle ownership is steadily increasing and there is an expectation that in the long-term electric vehicles will replace vehicles using fossil fuels. The government’s intention to ban the sale of petrol and diesel vehicles by at least 2035 (including hybrid vehicles) underlines the movement away from polluting vehicles. Policy T1 seeks to support the staged adaptation of the Neighbourhood Plan Area to this future reality. In responding to this policy, applicants should have regard for the future of electric cars, and should consider how electric vehicle technology is continuing to advance.

Policy T1: Proposals involving the installation of new electric car charging points will be supported subject to compliance with the other policies of the Development Plan.

New off-street parking spaces for residential or other development should have the capability to provide an electric charging point in the future (i.e. passive electric vehicle charging point).

- 9.3 In line with the London Plan, where electric vehicle charging points are to be provided onstreet, physical infrastructure should be located off the footpath. Where charging points are to be located on the footpath, a ‘pedestrian clear zone’ must be maintained, and the infrastructure accessible to all.

Policy T2 – On Street Parking

- 9.4 The Neighbourhood Plan Area mostly has unrestricted parking, as identified in Chapter 8 of the Baseline Report. Parking can have a negative impact on other road users, including buses, cyclists and pedestrians, including illegal parking near to road junctions. This policy supports highways interventions that would increase the free flow of traffic for all road users, without having a major impact on the amount of available parking or introducing a blanket Controlled Parking Zone

designation, which would be unpopular with the majority of local residents as demonstrated in our consultation to date.

Policy T2: Proposals that seek to improve the current parking layout in the Neighbourhood Plan Area would be supported. This includes proposals that allow for the creation of bus passing points within areas of heavy car parking, measures to prevent parking on corners and at crossing points and allowing for vehicle passing points. Parking should not dominate or overburden residential streets to the detriment of other road users, including cyclists and pedestrians.

- 9.5 In responding to Policy T2, regard should be had for Policy DM17 of the Local Plan.

Policy T3 – West Finchley Underground Station

- 9.6 West Finchley Underground Station is a key feature of the Neighbourhood Plan Area, serving many residents within and outside of its boundaries for their commute to work and leisure. Improved cycle parking facilities may encourage people to cycle to the station rather than drive and park nearby and waiting room facilities would improve the experience for all users of the station. Although outside of the Neighbourhood Plan Area, proposals to extend access to the Underground Station from Wentworth Avenue would be supported as this would provide step free access to the southbound platform.

Policy T3: Proposals involving the improvement of West Finchley Underground Station would be supported, including:

- a. The creation of improved cycle parking facilities;**
- b. Improved waiting room facilities;**
- c. Step free access; and**
- d. Improved public realm and landscaping.**



Glossary

Area of Archaeological Significance

Sites identified as containing remains of archaeological significance and are afforded greater protection from potentially harmful development. The Council with the assistance of English Heritage, the Museum of London and the Hendon and District Archaeological Society, have identified 19 specific sites in which are considered to be 'Local Areas of Archaeological Significance'.

Basic Conditions

The Basic Conditions is a set of requirements that draft Neighbourhood Plans must meet in order to proceed to a community referendum. These comprise the sole set of requirements of the content of a Neighbourhood Plan. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan);
- b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders;
- c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders;
- d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development;
- e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);

- f) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations; and
- g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

Change of Use

The process of changing the use of a property from one Use Class to another, with or without the need for planning permission (see the separate definition of Use Class).

Development Plan

The Development Plan is the collective term to refer to all statutory planning policy documents adopted relating to a particular area. The West Finchley Neighbourhood Plan will become part of the Development Plan once adopted, sitting alongside the Barnet Local Plan. Over time Development Plan documents are developed and replace existing documents.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that decisions on planning applications should be made in accordance with the development plan unless material considerations indicate otherwise.

Flood Zones

The Environment Agency categorises all land into 'Flood Zones' based on the probability of flooding from rivers or the sea. The Flood Zones are:

- Zone 1 (low probability) comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)
- Zone 2 (medium probability) comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual

probability of river flooding (1%- 0.1%)

- Zone 3a (high probability) comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%)
- Zone 3b (the functional floodplain) comprises land where water has to flow or be stored in times of flood.

Green Belt

A Green Belt is a designation that affects how land may be used. The approach to managing Green Belt Land is set out in the NPPF.

A Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Green Belt status is not a reflection of the quality of rural land; it simply reflects whether that land serves the Green Belt purposes set out above.

Most forms of development are regarded as inappropriate in the Green Belt by the NPPF and therefore can only be supported in 'very special circumstances', which are undefined and must be proposed in support of planning applications. The following forms of development are regarded as exceptions to inappropriate development:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection

with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

The NPPF sets out how the Green Belt should be managed. Green Belt boundaries can only be defined (or redefined) in Development Plan Documents. New Green Belts are expected to be created only in exceptional circumstances. When Green Belt sites are allocated in Development Plan Documents for new residential, commercial or institutional development to meet an identified need, they are generally 'released' from the Green Belt so that future proposals are not 'inappropriate'.

Green Infrastructure

The NPPF defines Green Infrastructure as a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Heritage asset

The NPPF defines a heritage asset as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets, which include Listed Buildings, Listed Parks and Gardens and Conservation Areas, Scheduled Ancient Monuments and World Heritage Sites, and 'undesigned' assets, which may be identified by the local planning authority or parish council (including locally listed buildings).

Infrastructure Delivery Plan

An Infrastructure Delivery Plan is a document that identifies infrastructure needs and priorities for a particular area, setting out how needed infrastructure will be funded and delivered. It can relate to many forms of infrastructure, such as highways, sewers, utilities infrastructure, green space, education and healthcare facilities and community halls. The Infrastructure Delivery Plan exists to add detail to the needs and priorities set out in the neighbourhood plan and to proactively set out how they will be assessed.

Listed Buildings, Structures, Parks and Gardens

Listing marks and celebrates the special architectural and historic interest of a building, structure, park or garden. It also adds special protection within the planning system, so that the asset can be protected for future generations. The older a listed asset is, the more likely it is to be listed. Listed Buildings are graded into three categories:

- Grade I buildings are of exceptional interest, only 2.5% of listed buildings are Grade I
- Grade II* buildings are particularly important buildings of more than special interest; 5.8% of listed buildings are Grade II*
- Grade II buildings are of special interest; 91.7% of all listed buildings are in this class and it is the most likely grade of listing for a home owner.

Works to Listed Buildings that affect its characteristics require Listed Building Consent, regardless of whether Planning Permission is also required or not.

Local Green Space

The NPPF states that a Local Green Space is an area of green space identified for protection in a Development Plan Document. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

Locally Listed Buildings, Structures, Parks and Gardens

The NPPF states that locally listed buildings, structures, parks and gardens are heritage assets identified at a local level. While these assets are technically 'undesigned' and Listed Building Consent is not required, the impact of a proposal on an undesigned heritage asset may be taken into account when determining a planning application.

Local Plan

The NPPF defines a local plan as a plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law, this is described as the development plan documents (see separate definition) adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Major Development

The Town and Country Planning (Development Management Procedure) (England) (Order) 2015 defines certain forms of development as major development. Major development means development involving one or more of the following:

- a) the winning and working of minerals or the use of land for mineral-working deposits;
- b) waste development;
- c) the provision of dwellinghouses where—
 - i. the number of dwellinghouses to be provided is 10 or more; or
 - ii. the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
- d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- e) development carried out on a site having an area of 1 hectare or more.

Major development is often treated differently within the planning system, including the statutory determination period for applications, which at 13 weeks is longer than the standard eight week period.

Metropolitan Open Land (MOL)

MOL covers areas of major open spaces within urban area that have more than borough-wide significance for their contribution to recreation, leisure and visual amenity and which receive same presumption against development as Green Belt.

The National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how

these should be applied to development. It also provides a framework within which locally-prepared plans for housing and other development can be produced.

Permitted Development

Permitted development rights are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted development rights are subject to conditions and limitations to control impact and to protect local amenity. Permitted development rights are contained within the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Policies Map

A map that shows the location of designations and allocations set in a Local or Neighbourhood Plan (or relevant other designations such as a conservation area). By virtue of simply providing a spatial illustration of Development Plan policies, Policies Maps form part of the Development Plan.

Site of Importance for Nature Conservation (SINC)

SINCs are areas protected through the planning process having been designated for their high biodiversity value. SINCs are classified into sites of metropolitan importance, borough and local importance for nature conservation.

Sustainable Development

The NPPF defines sustainable development. At a very general level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to

secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Use Classes

Updated to reflect changes to use class order September 2020.

Part B

- Class B2 – General Industrial
- Class B8 – Storage and distribution

Part C

- Class C1 – Hotels
- Class C2 – Residential institutions

- Class C2A – Secure residential institutions
- Class C3 – Dwellinghouses
- Class C4 – Small Houses in multiple occupation

Part E

- Class E(a) - Display or retail sale of goods, other than hot food
- Class E(b) - Sale of food and drink for consumption (mostly) on the premises
- Class E(c) - Provision of:
 - E(c)(i) - Financial services,
 - E(c)(ii) - Professional services (other than health or medical services), or
 - E(c)(iii) - Other appropriate services in a commercial, business or service locality
- Class E(d) - Indoor sport, recreation or fitness (not involving motorised vehicles or firearms)
- Class E(e) - Provision of medical or health services (except the use of premises attached to the residents of the consultant or practitioner)
- Class E(f) - Creche, day nursery or day centre (not including residential use)
- Class E(g) - Uses which can be carried out in a residential area without detriment to its amenity:
 - E(g)(i) - Offices to carry out any operational or administrative functions,
 - E(g)(ii) - Research and development of products or processes,
 - E(g)(iii) - Industrial processes

Part F

Class F1 - Learning and non-residential institutions - Use (not including residential use) defined in 7 parts

-
- F1(a) - Provision of education
 - F1(b) - Display of art (otherwise than for sale or hire)
 - F1(c) - Museums
 - F1(d) - Public libraries or public reading rooms
 - F1(e) - Public halls or exhibition halls
 - F1(f) - Public worship or religious instruction (or in connection with such use)
 - F1(g) - Law courts

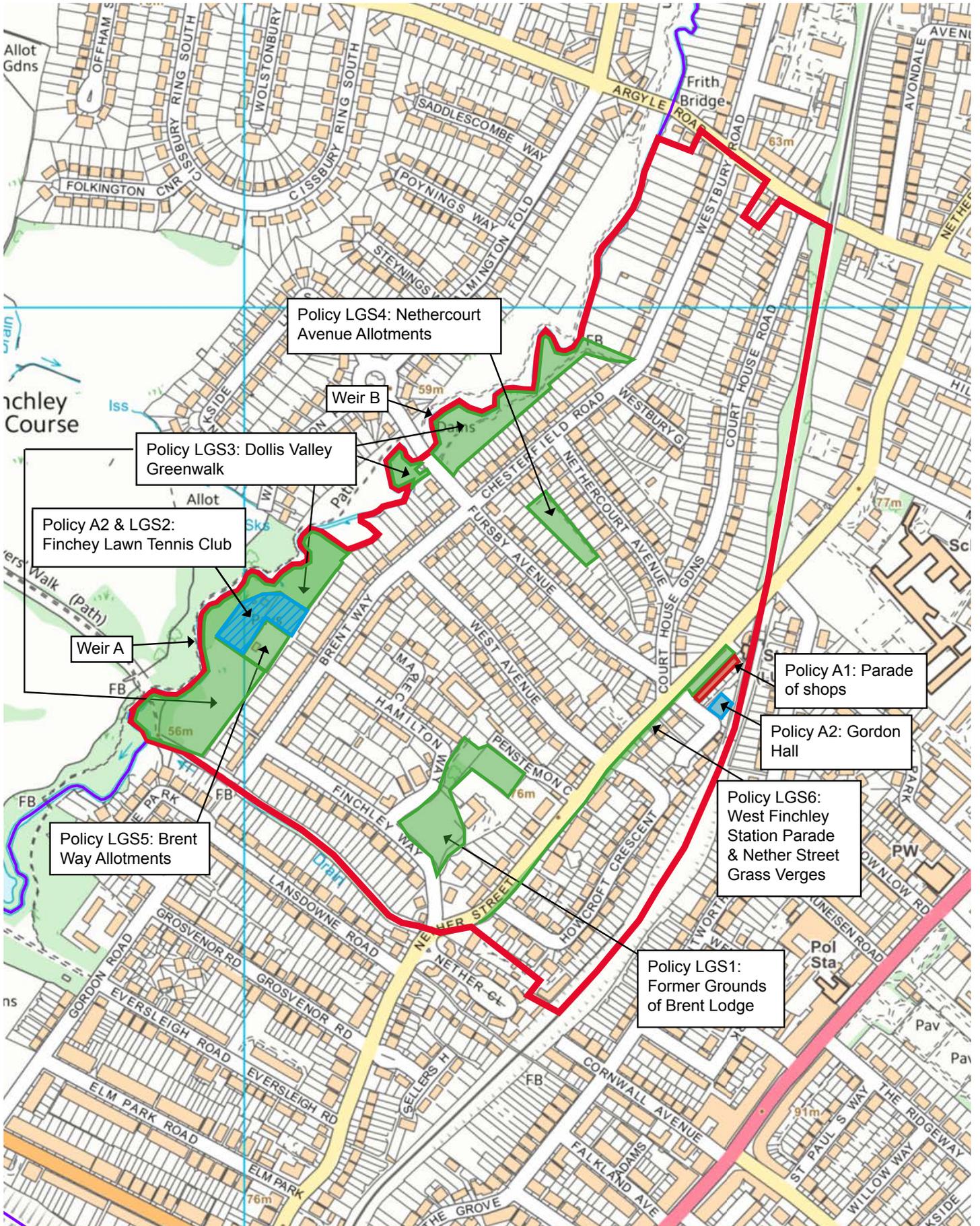
Class F2 - Local Community - Use as defined in 4 parts:

- F2(a) - Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres
- F2(b) - Halls or meeting places for the principal use of the local community
- F2(c) - Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms)
- F2(d) - Indoor or outdoor swimming pools or skating rinks

Not all uses of land or buildings fit within the use classes order. When no Use Classes order category fits, the use of the land or buildings is described as *sui generis*, which means 'of its own kind'. Examples of *sui generis* uses include: scrap yards, petrol stations, taxi businesses, casinos (these examples are not exhaustive).

Where land is or buildings are being used for different uses which fall into more than one class, then overall use of the land or buildings is regarded as a mixed use, which will normally be *sui generis*. The exception to this is where there is a primary overall use of the site, to which the other uses are ancillary. For example, in a factory with an office and a staff canteen, the office and staff canteen would normally be regarded as ancillary to the factory.

Supporting Document A: Proposals Map



Supporting Document B: West Finchley Neighbourhood Plan Design Guide

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Report on West Finchley Neighbourhood Plan 2020-2035

**An Examination undertaken for the London Borough of Barnet Council
with the support of the West Finchley Neighbourhood Forum, on the
November 2019 submission version of the Plan.**

Independent Examiner: Jill Kingaby BSc (Econ) MSc MRTPI

Date of Report: 27 August 2020

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Contents

	Page
Main Findings - Executive Summary	3
1. Introduction and Background	3
• West Finchley Neighbourhood Plan 2020–2035	3
• The Independent Examiner	4
• The Scope of the Examination	4
• The Basic Conditions	5
2. Approach to the Examination	6
• Planning Policy Context	6
• Submitted Documents	7
• Site Visit	7
• Written Representations with or without Public Hearing	7
• Modifications	8
3. Procedural Compliance and Human Rights	8
• Qualifying Body and Neighbourhood Plan Area	8
• Plan Period	8
• Neighbourhood Plan Preparation and Consultation	8
• Development and Use of Land	9
• Excluded Development	9
• Human Rights	9
4. Compliance with the Basic Conditions	10
• EU Obligations	10
• Main Issues	10
• General Issues of Compliance	10
• Specific Issues of Compliance of the Plan’s Policies	12
- Residential Development	12
- Amenities	15
- Streetscape	17
- Local Environment	17
- Transport	18
• Glossary	20
5. Conclusions	20
• Summary	20
• The Referendum and its Area	20
• Overview	20
Appendix: Modifications	22

Main Findings - Executive Summary

From my examination of the West Finchley Neighbourhood Plan (the Plan/WFNP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – West Finchley Neighbourhood Forum;
- The Plan has been prepared for an area properly designated – the West Finchley Neighbourhood Plan Area, as illustrated on Figure 1.1 of the Plan;
- The Plan specifies the period to which it is to take effect– 2020-2035; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to Referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

West Finchley Neighbourhood Plan 2020-2035

- 1.1 The West Finchley Neighbourhood Plan Area is a predominantly residential suburb within the London Borough of Barnet. Its western boundary is marked by Dollis Brook, and its eastern boundary by the track of the Northern Line underground service. The footpath, Lovers Walk, forms the southern boundary and Argyle Road marks the northern boundary, as is clearly shown on Figure 1.1. Inter-war, semi-detached housing is highly prevalent in the area, providing family housing for a range of age groups. There are also lesser numbers of terraced or detached dwellings and purpose-built flats interspersed with the semi-detached properties.
- 1.2 West Finchley covers some 35 hectares and has a resident population of about 3,000 which has remained fairly stable over the last 10 years, as the 2011 Census and 2016 Office for National Statistics population figures confirm. The area has a diverse ethnic profile, and is also a relatively affluent area, with high levels of economic activity among people of working age. About half of the economically active residents occupy professional or managerial, directorial or senior occupations. There are no formal employment locations of significant size in the Neighbourhood Plan

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Area, and most residents travel to work some 10-20kms away in Central London, or nearby towns to the north such as Watford. Transport accessibility is regarded as poor-moderate by Transport for London (TfL), probably because of the distance of West Finchley from Central London. However, the area is served by the underground (West Finchley station) and buses, notably Nos 326 and 221. There is a parade of local shops on Nether Street beside the tube station, as well as Gordon Hall which provides for community events and activities including a day nursery. Public open space is available along Dollis Valley. The former grounds of Brent Lodge, Finchley Lawn Tennis Club and two sets of allotments also provide outdoor space for sport and leisure activity. Schools and health centres are not present within the neighbourhood area, so that residents rely on such services outside West Finchley.

- 1.3 In February 2015, the West Finchley Residents' Association carried out an initial consultation exercise to understand the demographic structure of the area, and to seek opinions as to what people liked or disliked about West Finchley, and what they felt the area needed. Residents were informed about the Residents' Association and pending Neighbourhood Plan and asked whether they wished to become part of the Neighbourhood Forum. The West Finchley Neighbourhood Forum (the Forum) was formed, and meetings were held regularly throughout the period 2016 to 2019, as plan-making progressed. The emergence of the Plan and consultation process is described more fully in section 3 of this report.

The Independent Examiner

- 1.4 As the Plan has now reached the examination stage, I have been appointed as the examiner of the West Finchley Neighbourhood Plan by the London Borough (LB) of Barnet Council, with the agreement of the West Finchley Neighbourhood Forum. I am a chartered town planner and former Government Planning Inspector, with prior experience examining neighbourhood plans in London and elsewhere in England. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.5 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:

- Whether the Plan meets the Basic Conditions;
- Whether the Plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development';
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
 - whether the referendum boundary should be extended beyond the designated area, should the Plan proceed to referendum; and
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

1.7 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.8 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;

- Be compatible with and not breach European Union (EU) obligations; and
 - Meet prescribed conditions and comply with prescribed matters.
- 1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.¹

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of the London Borough of Barnet, not including documents relating to excluded minerals and waste development, includes the London Plan 2016, and Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) adopted by the LB of Barnet. The Core Strategy 2012 and Development Management Policies DPD 2012 form the current Local Plan for Barnet.
- 2.2 A new draft London Plan underwent Examination in Public between January and May 2019, with the Inspectors' report sent to the Mayor of London in October 2019. The Mayor wrote to the Secretary of State on 9 December 2019 indicating his intention to publish the new London Plan with a statement as to his reasons for not accepting some of the Inspectors' proposed recommendations for modification. The Secretary of State replied to the Mayor on 13 March 2020 with Directions to be addressed before publication, especially around issues of housing delivery. On 24 April 2020, the Mayor wrote back to the Secretary of State indicating his willingness for conversations to take place between the two parties over the Directions. Whilst the new draft London Plan does not yet form part of the Development Plan for the area, it is relevant to assessing the Basic Conditions in so far as the requirement to have regard to national policies and advice should be met.²
- 2.3 The LB of Barnet is currently preparing a new Local Plan, and consultation on the draft Plan was held between 27 January and 16 March 2020. Publication of a revised draft Local Plan is expected in winter 2020/21 for submission to the Secretary of State in Spring 2021. Again, although I do not test the WFNP against the policies in the emerging Local Plan, the

¹This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

² Planning Practice Guidance (PPG) Ref ID: 61-006-20190723, "Neighbourhood plans are not tested against the policies in an emerging local plan although the reasoning and evidence informing the local plan process may be relevant to the consideration of the basic conditions against which the neighbourhood plan is tested".

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reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the Basic Conditions against which the Plan is tested. It is on that basis that I consider the emerging Local Plan.

- 2.4 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 19 February 2019, and all references in this report are to the February 2019 NPPF and its accompanying PPG.³

Submitted Documents

- 2.5 I have referenced all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- The West Finchley Neighbourhood Plan: Regulation 16 Draft Neighbourhood Plan, November 2019;
 - Figure 1.1 of the Plan which identifies the boundary for the area to which the proposed Neighbourhood Development Plan relates;
 - the Engagement Report (Evidence Base Document B), November 2019, detailing all public consultation and engagement that has occurred;
 - the Legal and Basic Conditions Statement (Evidence Base Document E), November 2019;
 - Baseline Report (Evidence Base Document C), November 2019;
 - Additional Evidence Base Documents A, D, F & G, all November 2019;
 - Supporting Document B: Design Guide, November 2019;
 - all the representations that have been made in accordance with the Regulation 16 consultation;
 - the Strategic Environmental Assessment Screening Opinion of the LB of Barnet, Appendix E1 to the Legal Compliance and Basic Conditions Statement; and
 - the responses of the LB of Barnet of 22 May 2020 and West Finchley Neighbourhood Forum of 4 May 2020, to the questions annexed to my procedural letter of 7 April 2020.⁴

Site Visit

- 2.6 I made an unaccompanied site visit to the Neighbourhood Plan Area on 14 July 2020 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

- 2.7 This examination has been dealt with by written representations.

³See paragraph 214 of the NPPF. The Plan was submitted under Regulation 15 to the local planning authority after 24 January 2019.

⁴ View at: <https://www.barnet.gov.uk/planning-and-building/planning-policies-and-local-plan/neighbourhood-planning>

I considered hearing sessions to be unnecessary as the Regulation 16 consultation responses, together with responses to my questions of 7 April 2020 from the London Borough of Barnet and West Finchley Neighbourhood Forum Executive Committee clearly articulated objections to the Plan and put forward possible modifications. They also presented arguments for and against the Plan's suitability to proceed to a referendum, which I have taken into account.

Modifications

- 2.8 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The WFNP has been prepared and submitted for examination by West Finchley Neighbourhood Forum. The Forum (the qualifying body) and Neighbourhood Plan Area were designated by the LB of Barnet on 26 November 2015.
- 3.2 It is the only Neighbourhood Plan for West Finchley and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan specifies in 1.7 of the Introduction to the WFNP the period to which it is to take effect, which is from 2020 to 2035. However, for the avoidance of doubt, the Plan should specify the period to which it is to take effect on the front cover and I recommend accordingly in **PM1**.

Neighbourhood Plan Preparation and Consultation

- 3.4 In February 2015, the West Finchley Residents' Association carried out an initial consultation exercise comprising two surveys – a) an anonymous demographic survey; and b) a key issues survey, to seek opinions as to what people liked or disliked about West Finchley and what they felt the area needed. Residents were informed about the Residents' Association and pending Neighbourhood Plan and asked whether they wished to become part of the Neighbourhood Forum. 191 responses were received to the demographic survey, 124 to the key issues survey, and 39 people came forward to become members of the Forum. I consider this to represent a significant level of local interest and engagement in the Neighbourhood Plan preparation process. I note that Forum meetings were held three or four times each year 2016 - 2019.

- 3.5 In October-November 2017, the Forum sought views from residents on the emerging content of the WFNP (Vision, Objectives and policy ideas for a series of themes). Door-to-door calls and a leaflet drop, alerting residents to a questionnaire on paper and online, was supported by two engagement events. Between 18 March and 13 May 2019, in accordance with Regulation 14, consultation was carried out on the draft Neighbourhood Plan. The consultation was also reopened to allow some additional statutory bodies to comment between 5 June 2019 and 17 July 2019. Statutory bodies, local community and religious groups, as well as local residents, were notified using a variety of techniques. All were given the opportunity to provide feedback.
- 3.6 The revised submission WFNP was subject to public consultation in accordance with Regulation 16 between 15 January and 26 February 2020, and 24 responses were received, which I have taken into account in my examination of the Plan. Evidence Base Document B – Engagement Report, November 2019, provides a full account of the public consultation process adopted, as well as details of the information provided, and the views expressed by local residents and other parties. I am satisfied that the consultation process has met the legal requirements i.e. procedural compliance and has been fair and inclusive, having regard to the advice in the PPG on plan preparation.

Development and Use of Land

- 3.7 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

- 3.8 The Plan does not include provisions and policies for 'excluded development'.

Human Rights

- 3.9 Submitted Evidence Base Document E: Legal Compliance Statement (including the Basic Conditions Statement) states in section 5.0 that the Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights, and complies with the Human Rights Act. The LB of Barnet has not suggested that Human Rights (within the meaning of the Human Rights Act 1998) would be breached by the WFNP, and from my independent assessment I see no reason to disagree.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The WFNP was screened for Strategic Environmental Assessment (SEA) by the LB of Barnet, which found that it was unnecessary to undertake SEA. Having read section 5 of the Evidence Base Document E, and Appendix E1: SEA Screening letter (dated 13 May 2019), I support this conclusion.
- 4.2 Evidence Base Document E also records that the need for Habitats Regulations Assessment (HRA) was considered as part of SEA Screening, which concluded that HRA was not triggered by the WFNP. The Plan area is not in close proximity to a European designated nature site. Natural England raised no objections to the Plan in its letter of reply to the Regulation 16 consultation (dated 20 March 2020). From my independent assessment of the need for HRA, I have no reason to disagree.

Main Issues

- 4.3 I have approached the assessment of compliance with the Basic Conditions of the WFNP as two main matters:
- General issues of compliance of the Plan, as a whole; and
 - Specific issues of compliance of the Plan policies.

General Issues of Compliance

- 4.4 Chapter 1.0 Introduction to the Plan is concise and clearly written, and informs the reader as to the WFNP's purpose, its significance in the planning framework, and how it has been produced (led by the Forum and following community engagement). Figure 1.1 on Page 5 clearly shows the extent of the West Finchley area, and the photographs on Page 7 provide readers with views of some main features including the underground station, residential streets, allotments and tennis club. Five key themes: residential development, amenities, streetscape, local environment and transport are identified in Chapter 1, and they are the headings for chapters 5 to 9.
- 4.5 Chapter 2.0 A Portrait of West Finchley provides background information as to the area's location in North London, its demographic profile, housing and employment characteristics. Useful statistical information, notably from the last Census (2011), is given to describe the area's profile and compares it with Barnet and London overall, as well as England. The area's features in terms of retail offer, transport infrastructure, leisure, community facilities and social infrastructure, the environment, heritage and design, are described in a succinct but wide-ranging fashion. Points of interest are raised which are pursued in more detail in later chapters.
- 4.6 Paragraph 2.13 contends that there is little opportunity in West Finchley to contribute to meet the LB of Barnet's housing need figures, as set out in the emerging London Plan. The NPPF sets out the Government's

objective to significantly boost the supply of homes and ensure that a sufficient amount and variety of land can come forward where it is needed. I consider it important, therefore, to consider whether the Plan area should contribute towards the provision of much-needed new housing. Paragraph 2.13 of the Plan notes that the emerging London Plan “currently” expects the LB of Barnet to provide 31,340 new homes over the next 10 years. The LB of Barnet Draft Local Plan’s Policy GSS01: Delivering Sustainable Growth proposes substantial new housing development in growth areas at Brent Cross, Edgware Town Centre, Cricklewood, Colindale and Mill Hill East, as well as in district town centres. There is no reference in the adopted Core Strategy or emerging Draft Local Plan to new housing allocations on sites in West Finchley. I am therefore satisfied that the statement in paragraph 2.13 of the WFNP that “*there is little opportunity to contribute to meeting this need in the WFNP Area*” is reasonable and in line with the emerging Local Plan housing policy for the Borough, having regard to the advice in the PPG.

- 4.7 I note that there is currently uncertainty as to the precise housing requirement figure for the LB of Barnet, as neither the emerging new London Plan nor Draft Local Plan have yet reached the adoption stage. The emerging London Plan (Intend to Publish version December 2019) expects the LB of Barnet to provide nearly 30,000 new homes over the next 10 years (23,640 net housing completions with 4,340 on sites of 0.25 hectares or less), which is different from the figure of 31,340 cited in 2.13 of the WFNP. I recommend that text in the WFNP is modified to reflect the fluidity of the current situation regarding strategic housing policy. Proposed modification **PM2A** should be made to achieve this. Overall, from my site visit and from reading the background evidence to the Plan, I am satisfied that Chapter 2.0 provides a good overview of the area, which should assist readers and users of the WFNP. In my letter to the Forum of 7 April 2020, I requested that a map be added to show the extent of Green Belt land within the WFNP area, and I now recommend, in PM2A, that the map submitted on 4 May 2020 should be included as an illustration to paragraph 2.27. PM2A is necessary having regard for national policy.
- 4.8 A brief overview of Planning Policy Context is given in chapter 3.0, and I consider this to be very helpful for readers, especially those who may not be familiar with all the policy and regulations. Table 1: Development Plan Documents and Material Considerations which describes national, regional, local and neighbourhood level documents provides a useful point of reference. I propose some modification to chapter 3, to update the references to the emerging new London Plan and LB of Barnet Local Plan, and to remove the West Finchley Neighbourhood Plan Design Guide from Table 1 (for reasons given in 4.12-4.13 below). **PM2B** includes revised text so that the Plan will have regard for national planning policy.
- 4.9 Chapter 4.0 Overall Vision “*provides a simple mission statement for the Neighbourhood Plan, supporting positive developments that will improve the Neighbourhood Plan Area through to 2035*”. The key assets of the

area will be retained, and new development will improve the character and sustainability of the area, it is suggested. I am satisfied that this Vision has regard for national and emerging local planning policy and should contribute to the achievement of sustainable development. Chapter 4 identifies the key themes which are the subject of the following five chapters. The Glossary at the end of the Plan is also very helpful for readers.

- 4.10 In my initial questions to the Forum, I asked whether a new section on Implementation should be added, which might address issues of permitted development rights, the potential for Article 4 Directions, and the possible use of Community Infrastructure Levy (CIL) funds in West Finchley. The LB of Barnet pointed out that the Forum's role would end once the Neighbourhood Plan has been adopted. Notwithstanding this, in its response the Forum advised that it is in the process of applying for redesignation (consultation is now taking place and redesignation will be considered at the October LB of Barnet Planning Committee meeting). It is through the Forum, working with the West Finchley Residents' Association, that the Vision and Objectives will be monitored and any proposals concerning CIL monies discussed. I acknowledge that, once made, the Plan will be part of the Development Plan for the area for which the local authority is responsible. So whilst I shall not formally recommend a new chapter on Implementation be added to the Plan, I very much hope (assuming the Forum designation will be renewed) that the LB of Barnet and the Forum will in practice be able to work in partnership to monitor and review the Plan. Having regard for this information, I conclude on the first issue that the WFNP has a succinct and user-friendly structure and adopts a positive vision for future development of the area. As long as PMs 2A and 2B are made, the Basic Conditions for neighbourhood plans are met.

Specific Issues of Compliance of the Plan's Policies

Residential Development

- 4.11 Chapter 5.0 Residential Development confirms that the Plan has not allocated sites specific for housing development, but states, in line with national planning policy, that "*This does not mean that the Neighbourhood Plan restricts development*". The Vision is for new housing developments, or alterations to existing homes, to be high quality, in keeping with the character of the area and not harmful to the amenity of neighbours. Five objectives are set out and these seek in brief: good design; appropriate housing mix; use of sustainable materials and construction methods; no damaging environmental impacts, especially to biodiversity or flood risk; and minimum disruption during construction. The Vision and Objectives, in my view, meet the Basic Conditions for neighbourhood planning, and provide a helpful introduction to the policies for residential development in West Finchley.

- 4.12 Policy RD1 is intended to maintain the distinctive character and appearance of West Finchley’s residential streets, in which the repetitive use of specific materials, roof patterns, details of fenestration and spaces between properties play an important role in defining the streetscene. I fully support the thrust of the policy, which has regard for chapter 12 Achieving well-designed places, in the NPPF. Chapter 12 expects planning policies to give clear guidance to prospective developers as to what is expected from new development, and I recognise that Policy RD1 aims to do this, within the specific context of West Finchley. However, many alterations and extensions to existing properties can be carried out as permitted development, without the requirement for planning permission, and this should be made clear in the Plan. I am concerned that expecting applicants to demonstrate through a “proportionate statement” how they have had regard for the Neighbourhood Plan Design Guide overlooks permitted development rights and has insufficient regard for national policy. As I explained in my letter of 7 April 2020 to the Forum, the WFNP Supporting Document B: Design Guide does not form part of the Neighbourhood Plan, and does not have the same status as a DPD or a local authority’s SPD.
- 4.13 In order to have regard for national planning policy, the WFNP should make clear that its Design Guide is an advisory document and not integral to the WFNP. The requirement to submit a proportionate statement should be removed. However, I accept it is entirely reasonable and proportionate to promote the need to demonstrate that due regard has been had to the Design Guide. Paragraph 5.5 should be retained and should encourage all potential developers requiring planning permission to take account of the Design Guide. However, Policy RD1 should be modified, as in **PM3**, having regard for national planning policy, and for the achievement of sustainable development.
- 4.14 Regarding Policy RD2, and designing out crime, the LB of Barnet commented that it requires proposals to reflect “Secured by Design”. It advised that there is no national or local requirement for minor or household planning applications to provide supporting justification as to how the proposal is resilient to crime. I note that Policy CS12 of the Core Strategy and Policy CDH01 of the emerging Draft Local Plan seek to secure streets and environments that reduce opportunities for crime and help minimise the fear of crime. The WFNP should not replicate the policies in the Local Plan⁵ or place unreasonable requirements on minor applications for planning permission. However, the supporting text to the policy reports that the West Finchley Neighbourhood Plan Area experiences burglaries with some regularity. For this reason, I am satisfied that Policy RD2 should be retained, but propose modifications to the wording, as agreed by the Forum Executive (in its letter to me dated 4 May 2020) and as included in **PM4**. This should ensure that the policy aligns with national policy, is in general conformity with the strategic

⁵ NPPF paragraph 16 f).

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approach of the Local Plan and would not prevent the achievement of sustainable development.

- 4.15 Policy RD3 expects redevelopment proposals for existing residential sites to respect the current layout of streets and maintain historic alleyways and verges. I was able to appreciate the character of the street layout at my site visit and confirm that this policy should contribute to the achievement and protection of well-designed places, as expected by the NPPF.
- 4.16 Policy RD4 aims to restrict the use of impermeable materials when new driveways are created and retain planting in front gardens. However, the LB of Barnet pointed out that the development of driveways is covered by permitted development rights and questioned the merits of the policy. The LB is the Highway Authority for Barnet and it adopted a Domestic Vehicle Crossover Policy in April 2019, which provides some control over the provision of access from the highway into front gardens. I appreciate that this does not provide the degree of protection which the Forum seeks but consider that Policy RD4 should be removed and replaced with text which advises a cautionary approach to new driveway development. In reply to my letter of 7 April 2020, the Forum put forward some revised wording. **PM5** has regard for this wording albeit only in supporting text. The modification is necessary, having regard for national planning policy.
- 4.17 Policy RD5 Basement Developments raises a relatively new issue for West Finchley. As mentioned in paragraph 5.15 of the WFNP, the adopted Local Plan for the LB of Barnet does not include a policy for basement development, but in 2016 "*a Finchley home collapsed following the excavation of a basement*". The emerging new London Plan outlines the need for Boroughs to establish local policy to address the negative impacts of basement development where necessary. The Draft Barnet Local Plan includes Policy CDH06 Basements, and guidance as to how developments should be carried out is contained in Barnet's Residential Design Guidance SPD 2013, and Sustainable Design and Construction SPD, October 2016. I have taken account of the case put forward by Henry Planning Limited against Policy RD5, and the argument that building regulations already require adequate standards to be secured. However, Thames Water supported the WFNP policy and requested that it be strengthened to avoid incidents of flooding.
- 4.18 I consider that Policy RD5 should be retained but accept that some modification is needed to reflect the concerns raised. These include that the policy should not require excessive amounts of technical information which could be too onerous for developers and render acceptable schemes unviable, and could place unreasonable demands on the LB of Barnet which would have to scrutinise all impact assessments. The Plan text might helpfully cross-reference the Draft Local Plan Policy CDH06 and existing SPDs, and I consider the requirement for all proposed developments to be supported by detailed Basement Impact Assessment should be removed. In addition, the modified policy should take account

of the concerns of Thames Water. **PM6** should be made to Policy RD5 so that the Plan aligns better with the emerging new London Plan and Draft Barnet Local Plan, having regard to the advice in the PPG and in order to contribute to the achievement of sustainable development.

Amenities

- 4.19 Chapter 6.0 Amenities, has a Vision for shops, open space, leisure and community facilities to operate and improve, supporting the continued development of the local community. Five objectives to realise the Vision are set out which have regard for chapters 7 and 8 of the NPPF, Ensuring the vitality of town centres and Promoting healthy and safe communities. It was clear to me on my site visit that the parade of shops on Nether Street next to the West Finchley underground station provides an important community resource for local people, especially for elderly or mobility-impaired people, being within easy walking distance of many homes. I support the aim of Policy A1 to resist the loss of these units and to encourage the introduction of new facilities such as a pharmacy or post office.
- 4.20 In examining this policy, I have had regard for the Government's proposed changes to town centre use classes, which will come into force on 1 September 2020.⁶ These will introduce a new all-inclusive use class: Class E (Commercial, business and service) which will include shops (A1), financial/professional services (A2), cafes/restaurants (A3), indoor sports/fitness (D2 part), medical health and crèche/nurseries (D1 part) and business (B1). The effect will be that change of use between these uses (eg. from shop to restaurant) will no longer necessitate planning permission to be obtained. The Government's aim is to promote more diversification in town and local centres in a way that can respond to changes in the retail and leisure sectors. However, Policy A1 of the WFNP will need to be modified to have regard for this new national policy, as it seeks to prevent change of use from A class uses.
- 4.21 Prior to the Government's announced changes, the LB of Barnet Council argued that Policy A1 was too restrictive and inflexible and should be more closely aligned with Policy TOW02 in the Draft Barnet Local Plan. I appreciate the Council's concern that Policy A1's requirement for "exceptional circumstances" for a change of use, and the need for new uses to deliver "a greater community benefit" than the existing use, could be controversial and difficult to demonstrate. Emerging Local Plan Policy TOW02 seeks to protect A1 retail uses unless specified criteria can be met, including evidence that there is no viable demand for a use, supported by evidence of continuous marketing over a 12 month period. That draft policy, which would arguably protect the retail units in Nether Street, may also need to be revised in view of the latest Government statement on use classes. However, I consider that the requirement for

⁶ The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

evidence of non-viability based on a marketing exercise could be applied in West Finchley. I recommend that Policy A1 and the supporting text are modified as in **PM7**, to take account of new national policy, whilst maintaining the objective of protecting the parade of shops on Nether Street. In addition, the reference to a “designated” local parade of shops in the first sentence of Policy A1 should be removed, having regard to the evidence in Table 13 of the Draft Local Plan, which sets out the Borough’s hierarchy of shopping centres, and does not name all the smaller parades such as the one in West Finchley.

- 4.22 Policy A2 – Community Facilities seeks to protect two key facilities at Gordon Hall and Finchley Lawn Tennis Club. I saw at my site visit that both are well-used, and fully support their retention through this policy, as well as the encouragement given to the creation of new community facilities.
- 4.23 Policy A3 seeks to designate a number of areas within West Finchley as Local Green Spaces (LGSs), and the supporting text explains that their designation would comply with the criteria set out in paragraph 100 of the NPPF.⁷ Having read the Evidence Base Document D, referenced in paragraph 6.7 of the Plan, and having seen all the green spaces during my site visit, I am generally supportive of the policy. I questioned the need to designate Finchley Lawn Tennis Club in my letter of 7 April to the Forum and LB of Barnet. The Forum, in its response, consulted the Chair of the Tennis Club and provided clarification on court surfacing and plans for future development. On the question as to whether LGS designation would be appropriate, however, the LB of Barnet agreed with my concern that adding LGS designation to the site’s existing and strong designation as Green Belt would give no additional benefit. The Government’s PPG indicates that, where sites are already part of the Green Belt, the matter of additional benefit should be considered when LGS designation is proposed (PPG Reference ID: 37-010-20140306). As the Tennis Club is named in Policy A2 as a key community facility for protection, as well as being in the Green Belt, I am satisfied that its omission from Policy A3 will not lessen the Club’s future protected status and community value. **PM8** to remove Finchley Lawn Tennis Club from Policy A3, and to modify Figure 6.3, should be made having regard for national planning policy.
- 4.24 Figures 6.1, 6.2 and 6.3 illustrate the sites within West Finchley of the facilities which are subject to Policies A1, A2 and A3. I commend the Forum for providing such clear maps. Policy A4 supports improvements which could enhance the role of LGSs, and it meets the Basic Conditions for neighbourhood planning.
- 4.25 Policy A5 supports proposals which result in improvements to local utilities’ infrastructure and expects major development to be accompanied by evidence that there is sufficient capacity within the utilities’ network. Thames Water expressed support for the approach and proposed some

⁷ See also PPG Reference IDs: 37-005-20140306 to 37-022-20140306.

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additional text to encourage developers to make early contact with its pre-planning service. I recommend that paragraph 6.10 is expanded accordingly, as in **PM9**, to contribute to the achievement of sustainable development.

Streetscape

- 4.26 Chapter 7.0 Streetscape has a Vision to enhance West Finchley's streetscape over the Plan period, with objectives to promote the use of good design for safety reasons, and to improve street furniture, pavements and other features. Policy S1: Local Character and Heritage refers to the Heritage and Character Assessment (Evidence Base Document A, submitted with the WFNP). This contains a thorough assessment of West Finchley's history, past development and key characteristics. Nationally and locally listed heritage assets are named in paragraphs 7.3 and 7.4 of the Plan, and a fuller description of their character and significance is given in the Heritage and Character Assessment. The Evidence Base Document refers to Policy 7.4 of the London Plan, Consolidated Version, 2016; Policy D1 of the Draft New London Plan 2018; and Policy DM06 of Barnet Core Strategy. I consider that Policy S1 is in general conformity with the adopted strategic policies, and has regard for the NPPF, Chapter 16 Conserving and enhancing the historic environment.
- 4.27 Policy S2 – Public Realm Improvements is described as setting out a number of desirable features that would improve the public realm. I note the LB of Barnet's comment that Policy S2 be amended to set these out as CIL aspirations, with the Forum's response that it does not envisage development of a scale to generate CIL funds.⁸ In general, I support the aspiration to achieve public realm improvements, where possible. It has regard for the NPPF's goal for achieving well-designed places (Chapter 12), and I propose no modifications to Policies S1 and S2.

Local Environment

- 4.28 The Vision in Chapter 8.0, Local Environment, is to maintain and enhance green areas and to reduce flood risk and air pollution. As pointed out by the Environment Agency at the Regulation 14 consultation stage, the NPPF as updated in 2018/19 supports the pursuit of opportunities for net gains for biodiversity (paragraphs 170 and 174). The Forum, in its letter to me dated 4 May 2020, proposed changes to Policy LE1 and the supporting text to have regard for the updated national policy. I support the proposed enhancement of the policy, although I consider that the requirement to identify, map and safeguard habitats and wider ecological networks could be viewed as restrictive and onerous by some developers. It should be a requirement only for major developments, in my view. The Environment Agency pointed out that Dollis Brook is within the functional

⁸ Although not material to this examination, the Government is currently consulting on the abolition of CIL in its green paper, "Planning for the future".

floodplain where water has to flow or be stored in times of flood. Only “water compatible” development is appropriate in the floodplain, and this is made clear in paragraph 8.3 following Policy LE1. Paragraph 8.4 describes improvements to Dollis Brook from the Water Framework Direction within the Thames River Basin Management Plan. I recommend that **PM10** is made to ensure that Policy LE1 will contribute to the achievement of sustainable development and have regard for national planning policy.

- 4.29 Policy LE2 seeks to protect trees and avoid their removal, where possible. In accordance with the Mayor of London’s policy, it supports an increase in tree numbers. The supporting text refers to the LB of Barnet’s Tree Policy 2017 and Green Infrastructure SPD 2017. I note that the Tree Policy aims to increase the number of trees across the Borough and replace trees on a one to one ratio basis when tree removal is necessary. Policy LE2 is in general conformity with Policy DM01 of the adopted Barnet Development Management Policies document 2012 (and aligns the emerging Local Plan Policy ECC04: Barnet’s Parks and Open Spaces, in my opinion).
- 4.30 Policy LE3 aims to protect air quality and support sustainable travel practice, and has regard for the NPPF, notably chapters 9 Promoting sustainable transport and 14 Meeting the challenge of climate change, flooding and coastal change. The supporting text refers to West Finchley forming part of an Air Quality Management Area. Draft London Plan Policy T2 and the London’s Healthy Streets Approach are also mentioned. These are intended to create high quality, pleasant and attractive environments with clean air and enough space for dwelling, walking, cycling and public transport use. The dominance of vehicles should be reduced and measures that improve Londoners’ experience of individual streets, including greening, should be embedded in new development. Policy LE3 supports measures that would reduce the number of car trips and encourage active travel. I consider that Policy LE3 should contribute to the achievement of sustainable development and is in general conformity with the strategic policies for London and the LB of Barnet.

Transport

- 4.31 Chapter 9.0 addresses the issue of Transport in greater detail. Its Vision, to help all residents to travel to and from their homes safely, efficiently and sustainably, is clear. Seven objectives are set out, which address all travel modes and the effect of transport infrastructure (eg. pavement and pathways, and paved front gardens). Transport for London (TfL) supports the references in the WFNP to the Healthy Streets’ Approach, Vision Zero (TfL’s strategy for safety on London’s roads) and the Good Growth initiative. Policy T1 Electric Charging Points is in line with Government policy to ban the sale of petrol and diesel vehicles. Paragraph 9.3 makes clear that a ‘pedestrian clear zone’ must be maintained where charging points are located on a footpath, and the infrastructure made accessible to all. However, paragraph 9.2 indicates that the ban on petrol and diesel vehicles will occur by 2040, whereas the latest intention is by at least

2035. Paragraph 9.2 should be modified, as in **PM11**, to provide the updated timescale and ensure that Policy T1 will have regard for national policy.

- 4.32 On-street parking is permitted throughout West Finchley except on Nether Street and close to the underground station. On-street parking occurs widely in the area, even though many of the predominantly semi-detached properties offer off-street parking. There is also significant incidence of parking in front gardens, which can result in the loss of planting and greenery and detract from the appearance of the streetscene. I appreciate that West Finchley is an Outer London location where the Public Transport Accessibility Level (PTAL) is modest compared with much of the Metropolitan area. Paragraph 2.15 of the Plan explains that some 30% of local employed residents travel by car to work, and most employed people travel some 10-20kms to their workplace. Paragraph 9.4 of the WFNP states that "*a blanket Controlled Parking Zone designation ... would be unpopular ... as demonstrated in our consultation to date*". However, TfL commented that there is ambiguity in the Plan towards parking; it would prefer to see a stronger commitment to encourage alternatives to car use. TfL suggests that this will be necessary to prevent higher congestion as the population grows; in some instances, measures such as controlled parking zones may be needed.
- 4.33 I agree with TfL that a stronger commitment to reduced car use, when the WFNP addresses on-street parking, would be desirable. It would contribute to the achievement of sustainable development. I note the support for a Low Traffic Neighbourhood (LTN) scheme from Barnet Cycling Campaign. However, control of on-street parking and/or the introduction of a LTN would be matters for the LB of Barnet as highway authority. Although it is conservative, I accept that Policy T2, with the reference to Local Plan Policy DM17 in paragraph 9.5, which includes policy to manage parking in new developments, meets the Basic Conditions.
- 4.34 Policy T3 supports proposals to improve West Finchley underground station which should, in my view, increase the attractiveness of public transport and contribute to the achievement of sustainable development. TfL queried the need for improvements to waiting facilities and pointed out that extending the opening hours for step-free access from Wentworth Avenue was unlikely to occur in the immediate future. However, I am satisfied that Policy T3 is supportive of sustainable transport and includes some positive aspirations for improvement to the underground facility. It accords with the Basic Conditions for neighbourhood planning.
- 4.35 I have taken account of the concerns expressed in the Regulation 16 responses to the submitted Plan that the Bye-Laws relating to Pleasure Grounds do not permit cycling along Dollis Valley Greenwalk. The Forum advised that the issue of pedestrian and cycle use along the Greenwalk has been contentious, especially since the LB of Barnet upgraded some of the paths and added new signage. It understands that cycling is

permitted between Fursby Avenue and Lovers Walk from the signposting. The LB of Barnet advised that use by cyclists can be permitted along the Greenwalk just as in other parts of the park, without affecting the status of the public footpath. I shall not recommend modification to the WFNP on this matter.

Glossary

- 4.36 A Glossary of terms is included at the end of the Plan, which should assist all readers to understand planning procedures and use of language. On Page 40, SINC is described. It appears that the full title – Site of Importance for Nature Conservation - has been abbreviated, and I recommend that it is set out in full, as in **PM12**. In addition, the last sentence explaining Development Plan would be clearer if it referred to decisions “on planning applications”, and I propose a minor change to wording, also in PM12. Providing all the above proposed modifications are made, I conclude that the policies in the WFNP will meet the Basic Conditions

5. Conclusions

Summary

- 5.1 The WFNP has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The WFNP as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

- 5.4 I appreciate that the West Finchley Neighbourhood Forum has worked very hard over the past five years to develop its Neighbourhood Plan and

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follow all the necessary procedures for consultation with the community, and to produce a Plan which meets the Basic Conditions. I congratulate the Forum on producing such a concise but comprehensive Plan, with a clear and logical structure, and high quality illustrations (maps and photographs). I am most grateful to the Forum Executive Committee and LB of Barnet for responding during May to my initial questions, in spite of the Covid-19 restrictions, so that the examination could progress.

Jill Kingaby

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Front cover	Insert 2020-2035 after the Plan's title.
PM2A	Page 10	<p>2.13 The emerging Draft New London Plan 2018 currently expects <i>gave a ten year housing target for</i> LB of Barnet of to provide 31,340 new homes between 2019/20 and 2028/29, with an annual monitoring target of 3,134, <i>based on the 2017 Strategic Housing Land Availability Assessment. The more recent Intend to Publish version of the emerging London Plan, December 2019, provided a lower figure of 23,640 net housing completions for the same period. There is currently uncertainty as to the housing target for the Borough. However,</i> there is little opportunity.....</p> <p>2.27 The undeveloped land This site is also a Site of Borough Importance <i>for</i> Nature Conservation, <i>as shown in Figure 2.1.</i></p> <p>Add a new Figure 2.1 to illustrate Green Belt, Metropolitan Open Land and the SINC, as well as the site of Special Archaeological Significance.</p>
PM2B	Pages 15-16 and Page 3	<p>Table 1: Development Plan Documents and Material Considerations</p> <p><u>The London Plan (London Plan)</u></p> <p>Third column, second sentence:</p> <p>A New London Plan is being prepared and underwent draft consultation in January-March 2018 <i>an EIP in 2019. The Secretary of State issued a Direction to secure amendments to the Plan in March 2020. It is currently uncertain as to precisely when</i> tThe Mayor <i>will</i> expects to adopt the new London Plan in Autumn 2019.</p>

		<p><u>Emerging LB Barnet Local Plan</u></p> <p>Modify the second column:</p> <p>This will replace both the Core Strategy and the DMPD LB Barnet from 20162021(base year for monitoring) to 20312036.</p> <p>In the third column, replace the second sentence with: <i>A draft of the Local Plan was consulted on between 27th January and 16th March 2020.</i></p> <p>Remove the last entry on Page 16 relating to West Finchley Neighbourhood Plan Design Guide.</p>
PM3	Page 19	<p>Policy RD1 – Utilising the Neighbourhood Plan Design Guide</p> <p>Policy RD1: Proposals involving new, or enlarged or exteriorly altered residential properties, or alterations to the exterior of buildings of a scale which require planning permission, should be designed street scene. All proposals should be formed with due regard seek to demonstrate how regard has been had to the Neighbourhood Plan Design Guide. This should be demonstrated through the submission of a proportionate statement.</p>
PM4	Page 19	<p>Policy RD2 – Secure Homes</p> <p>Policy RD2: Proposals involving(including neighbours). When submitting applications....are resilient to crime.</p> <p>Proposals involving the creation of new secured by design.</p> <p>5.8 Security measures</p> <p>1., 2., 3.,</p> <p>4. Use of</p>
PM5	Page 20	<p>Policy RD4 – Driveways</p> <p>5.11 Most homes in the Neighbourhood</p> <p>Policy RD4: Planning applications including to water run-off.</p> <p>5.12 While the Neighbourhood Plan understands</p>

		<p>the desire to create New front driveways can be constructed under permitted development rights, it but the Neighbourhood Plan supports well-designed driveways that do not increase run-off, and thereby reduce flood risk, through use of permeable materials (such as gravel or permeable paving) and retain an element of planting. This reduces surface-water run-off rates in the Neighbourhood Plan Area. Planting has an additional benefit of reducing the impact of new driveways on the character of the Neighbourhood Plan Area. The Neighbourhood Plan Design Guide provides further detail on the layout of new residential development, including for driveways and planting. It is recommended reading for all those proposing alterations to front driveways.</p>
PM6	Pages 20-22	<p>Policy RD5 – Basement Developments</p> <p>5.15 In 2016 a Finchleycontrols basement development. The Barnet Draft New Local Plan, however, contains Policy CDH06 which sets out design principles for proposals for basements. It refers to the LB Barnet Residential Design Guidance and Sustainable Design and Construction SPDs, which should also be followed when basement development is proposed.</p> <p>5.16 The Neighbourhooddwellings at risk.</p> <p>New 5.17 Thames Water advises that basement developments should incorporate devices to prevent sewage backflows and flooding. This is because the wastewater network may surcharge to ground level during storm conditions. Such measures are required to comply with the NPPF, which highlights the need to avoid flooding, and also in the interests of good planning practice, as recognised in Part H of the Building Regulations.</p> <p>Policy RD5: Basement development should be ...</p> <ul style="list-style-type: none"> a. should be limited ... b. should not result

		<p>c. should be mostly invisible.....</p> <p>Proposals for basement developments must:</p> <p>a.....</p> <p>b.....</p> <p>c. Be supported by a Basement Impact Assessment (BIA) comprising</p> <p>i. ii. iii. iv. completion. appropriate evidence that there would be no adverse effect on neighbouring ground water or local ground conditions. All basement development should incorporate a positive pumped device or other suitable flood prevention device to avoid the risk of sewage backflows which can cause sewer flooding.</p> <p>d. Include proportionate</p> <p>e. Provide details to neighbours.</p>
PM7	Page 25	<p>Policy A1: The row of shops on Nether Street, as shown on Figure 6.1, is designated as a Local Parade of Shops an important local community asset. Change of use to non AE Class uses in the retail units along the parade would only be acceptable in exceptional circumstances, where the new existing use. will be resisted unless evidence of no viable demand for the unit, based on continuous marketing over a 12 month period, can be demonstrated.</p> <p>In the units</p> <p>6.3 From 1st September 2020, Government changes to the Use Classes Order come into effect. A new Class E (Commercial, business and service) will combine the following use classes: shops (A1); financial/professional (A2); cafes/restaurants (A3); indoor sport/fitness (D2 part); medical health facilities and crèche/nurseries (D1 part) and office/business use (B1). Policy TOW02 of</p>

		<i>the emerging Barnet Draft Local Plan which aims to protect retail uses unless specific criteria are met is also relevant to the future of the shopping parade.</i> Many of the current
PM8	Pages 28-29	Policy A3 – Local Green Spaces LGS2 Finchley Lawn Tennis Club should be removed from the list of LGSs in Policy A3. Figure 6.3 should be modified to remove LGS2 Finchley Lawn Tennis Club.
PM9	Page 28	Policy A5 – Utilities Infrastructure 6.10 Good utilities ... adversely impacted. <i>For example, developers need to consider the net increase in water and waste water demand to serve their developments, and also any impact the development may have off-site further down the network, if no/low water pressure and internal/external flooding of property is to be avoided. Thames Water encourages developers to use its free pre-planning service. https://www.thameswater.co.uk/preplanning This service will tell developers at an early stage if there will be capacity in the water and/or wastewater networks to serve their development, and what can be done if not. This enables Thames Water to serve new development at the point of need and speed up the delivery of new development.</i>
PM10	Page 32	Policy LE1 – Dollis Valley Greenwalk Flood Risk Policy LE1: Proposals that would reduce the amount of flood risk in the Dollis Valley Greenwalk would be supported provided there would be no significant damage to biodiversity or the enjoyment of the Dollis Valley Greenwalk. Proposals that seekencouraged and supported. <i>Proposals for development should contribute to, and enhance, the natural and local environment by minimising impacts on, and providing net gains for biodiversity, including by establishing coherent ecological</i>

		<p>networks that are more resilient to current and future pressures; and preventing the unacceptable risk or occurrence of soil, air, water or noise pollution, or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</p> <p>Where major development is proposed, in order to protect and enhance biodiversity and geodiversity, plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks; wildlife corridors and stepping-stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and promote the conservation, restoration and enhancement of priority habitats, ecological networks and priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</p> <p>Add the following text after paragraph 8.4:</p> <p>The National Planning Policy Framework states that planning policies and decisions should protect and enhance valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the most versatile agricultural land, and of trees and woodland.</p>
PM11	Page 36	<p>Policy T1 – Electric charging points</p> <p>9.2 Electric vehicle ownership sale of petrol</p>

		and diesel vehicles by 2040 at least 2035
PM12	Pages 37-42	<p>Glossary</p> <p>Development Plan</p> <p>The Development Plan isreplace existing documents.</p> <p>Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that decisions on <i>planning applications</i> made should be made in accordance</p> <p><i>Site of Importance for Nature Conservation (SINC)</i></p>

Neighbourhood Planning Referendum - West Finchley Area

I, John Bailey, being the Deputy Counting Officer at the above local referendum, do hereby give notice that the number of votes recorded for each answer to the referendum question is as follows:

Referendum question:

"Do you want the London Borough of Barnet to use the Neighbourhood Plan for West Finchley to help it decide planning applications in the neighbourhood area?"

Yes	329
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No	67
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And I therefore declare that electors voted **Yes** to the referendum question.

The number of ballot papers rejected is as follows:

<i>Want of Official Mark</i>	0
<i>Voting for more than one candidate</i>	0
<i>Writing or mark by which a voter could be identified</i>	1
<i>Blank or Void for Uncertainty</i>	0

Turnout: 28.6%

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Policy & Resources Committee

30 September 2021

	<p style="text-align: right;">AGENDA ITEM 12</p> <p style="text-align: center;">Policy & Resources Committee</p> <p style="text-align: center;">30 September 2021</p>
<p style="text-align: center;">Title</p>	<p style="text-align: center;">Proposed Extension of the Shared Service Agreement with Harrow for the Provision of Legal Services (HBPL)</p>
<p style="text-align: center;">Report of</p>	<p>Chairman of the Policy and Resources Committee</p>
<p style="text-align: center;">Wards</p>	<p>All</p>
<p style="text-align: center;">Status</p>	<p>Public (with the exception of the Appendix 2 containing hourly rates which is exempt information which is not for publication by virtue of paragraph 3 of Schedule 12A of the Local Government Act 1972 as amended (commercially sensitive information)).</p>
<p style="text-align: center;">Urgent</p>	<p>No</p>
<p style="text-align: center;">Key</p>	<p>Yes</p>
<p style="text-align: center;">Enclosures</p>	<p>Appendix 1 – Key Performance Indicators Appendix 2 (Exempt) – Legal Services Hourly Rates</p>
<p style="text-align: center;">Officer Contact Details</p>	<p>Andrew Charlwood, Head of Governance, andrew.charlwood@barnet.gov.uk, 020 8359 2014</p>

Summary

In 2012 Barnet Council entered a shared service agreement for legal services with Harrow Council which commenced on 1 September 2012 for a minimum of five years. The agreement was extended in 2016 for a further five years with the current arrangement due to expire on 31 August 2022.

Under the terms of the agreement the parties may agree to extend the agreement for a further period of up to five years. If the agreement is not to be extended it will be necessary to start planning now for the end of the agreement and the future provision of legal services for Barnet Council. Officers have considered alternative options and, following an assessment of those options, it is recommended that the agreement is extended, and the delivery of legal services is delegated to the shared legal service.

Officers Recommendations

- 1. That the Committee agree to extend the agreement with Harrow for a shared legal service for a further period of five years until 1 September 2027 (in accordance with paragraph 2.2 of the agreement).**
- 2. That the Committee agree that the London Borough of Harrow discharge Barnet Council's function in respect of the delivery of legal services in accordance with section 101 of the Local Government Act 1972 and the inter authority agreement.**
- 3. That the Committee delegate authority to the Executive Director Assurance to:**
 - (a) commence formal review of the arrangements;**
 - (b) seek agreement in principle to the extension from the London Borough of Harrow;**
 - (c) review the existing inter authority agreement to ensure that it is fit for purpose; and**
 - (d) negotiate and agree any amendments required.**

1. WHY THIS REPORT IS NEEDED

Background

- 1.1 HBPL provide a comprehensive legal service to Barnet Council. However, the Council can use other legal providers for specific pieces of work if it wishes to do so (e.g. work relating to Brent Cross Cricklewood, instructing counsel in a particular matter, etc.) The service is a shared service between Barnet and Harrow, but Harrow are the lead authority in relation to the operational delivery of the service. An Inter Authority Agreement (IAA) is in place to set out the shared objectives which are, in summary, to:
 - Provide a high-quality service, commitment to staff and clients of the service and to long term savings and benefits to both parties
 - Adopt a systematic approach to partnership working and problem resolution
- 1.2 This partnership approach has overall been successful. HBPL provide a full legal service across all areas of the Council's work and legal work is carried out by HBPL where possible. This has led to a reduction in the use of counsel and instructions to external firms on more routine matters. Overall HBPL meets its performance targets and clients are broadly satisfied with the quality of the service.
- 1.3 In addition to providing legal services to the London Borough of Barnet and the London Borough of Harrow, HBPL also provide services to the London Borough of Hounslow and Slough Borough Council.

Process Improvements

- 1.4 Several process improvements have been implemented over the last 18 months:
 - Introduction of quality meetings with services and directorates to deal with matters and issues not reported via KPIs

- Improvements to contract management and monitoring arrangements (including regular contract management meetings, escalation of performance issues, etc.)
- Review of all legal budget codes and responsible officers
- Updated Legal Services content HBPL - Home (sharepoint.com) including:
 - Up to date contact lists for HBPL staff
 - Order forms for legal services including instructions and legal code
 - Income process maps
- Distribution of legal income to services from 2021/22 (i.e. property (legal fees, surveyor fees, solicitor fees), highways, CAFT, planning, community safety)

Performance Indicators

- 1.5 The following performance indicators are monitored at quarterly Contract Management Meetings attended by the HBPL Head of Legal Practice, the Head of Governance (Client Lead for the HBPL contract) and the Contracts and Partnership Lead, Assurance Directorate. Performance information is also reported quarterly to the Financial Performance and Contracts Committee. A summary of performance information regularly reported is as follows:
- Overall number of hours worked with breakdown by client and work type;
 - Cost of disbursements by client and work type;
 - Volume of new instructions in that month by client and work type;
 - Overall number of open matters by client and work type;
 - Number of matters closed by client and legal work type with total hours charged for each matter; and
 - Cost of external Barristers and Solicitors in a quarter by client and legal work type.
- 1.6 During 2020/21 and into 2021/22 discussions have taken place with directorates and services regarding the quality of services provided by HBPL as service quality is not a measure captured in KPIs. Overall feedback has been positive across all services and directorates. Where issues have been identified these have been or are being addressed between HBPL and the services, with oversight from the council's Contracts Lead and Client Lead.
- 1.7 Bi-monthly contract Management Meetings are in place which regularly review: quality issues; risks, issues and complaints; and intranet content.

Value for Money

- 1.8 HBPL has a very competitive blended hourly rate¹ in comparison with private sector firms. Exempt Appendix 2 details comparative hourly rates. Since the start of the IAA hourly rates for legal services have been increased in line with inflation.

¹ A blended hourly rate means that Barnet pay a single rate for legal services, rather than a scaled rate dependent on experience and/or seniority.

- 1.9 Overall spend on legal services is set out in the Resources section below.
- 1.10 An objective of the current IAA is to deliver savings and benefits to both parties. It does not exist to make a profit and so its hourly rate is very competitive. Under the terms of the agreement with Harrow any budget surplus is either reinvested in the service or shared between Barnet and Harrow. Details of the surplus received is set out in the Resources section below.

Other Considerations

- 1.11 In addition to the budget surplus share, the Council benefit from being part of a shared service in the following ways: reduced management costs and the costs of overheads are shared; lawyers can specialise rather than be generalists; sharing learning from experience gained at other councils (subject to rules on client confidentiality); sufficient work for HBPL to recruit some specialists into the shared service; better operational flexibility to cover leave periods and peaks in workload; and HBPL has greater purchasing power than a smaller department.

2. REASONS FOR RECOMMENDATIONS

- 2.1 The Council are required to use legal services in the discharge of their functions and responsibilities to ensure that the Council acts lawfully and that the Council's interests are safeguarded. These arrangements should achieve an appropriate balance of value for money and quality. Alternative options have been evaluated and a preferred option is recommended.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 The Council have the option to undertake a procurement exercise for the provision of legal services. An open market tender exercise in accordance with the Council's Contract Procedure Rules could be undertaken, or a call off contract from an existing public sector legal framework could be used. This is not recommended because:
- HBPL is a shared legal service which Barnet have a degree of control over;
 - The agreement is an IAA which comes within the exceptions to public contract procurement rules in Regulation 12 of the Public Contracts Regulations 2015. A procurement exercise will take time and resources to complete and there is no guarantee of achieving better value for money or delivering improvements in service quality;
 - Loss of shared budget surplus;
 - Likely to impact on Barnet's Monitoring Officer arrangements;
 - Re (Regional Enterprise Limited, a joint venture between the London Borough of Barnet and Capita for the provision of regulatory services) will be required to enter into a separate agreement with HBPL, or find an alternative provider of legal services.
- 3.2 The Council have the option to set-up an in-house legal department at Barnet. This option is not recommended because:
- There are likely to be significant set up costs including (but not limited to) project costs, staff transfers, pension costs/liabilities, accommodation costs, IT, recruitment, and training;
 - Developing an in-house service will take significant resources to deliver and there is no guarantee of achieving better value for money or delivering improvements in service quality;
 - Loss of shared budget surplus;
 - Likely to impact on Barnet's Monitoring Officer arrangements; and
 - Re will be required to enter into a separate agreement with HBPL, or find an alternative provider of legal services.

4. POST DECISION IMPLEMENTATION

- 4.1 Commence formal review of the arrangement with HBPL and seek agreement from relevant Members and officers at LB Harrow to agree in principle to extend the agreement to 2027. Following agreement in principle, LB Harrow to seek Cabinet approval to extend the arrangement.
- 4.2 Review the existing IAA to ensure that it is fit for purpose and negotiate and agree any amendments required.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 Access to good legal advice is central to achieving all of the council's priorities as set out in the Barnet Plan 2021 - 2025. Continuing with a shared legal service is in line with the council's priority of Clean, Safe and Well Run. It also accords with the council's duty to

obtain best value.

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

5.2.1 From 2017/18 onwards departments and services were given a delegated legal budget. Prior to this, legal services were received by departments and services on their instructions but were paid for from a central budget managed by the Commercial team. As present, legal services expenditure forms part of the council's revenue budget as it has been disbursed to departments and services. Overall expenditure on legal services over the duration of the current IAA has been as follows:

2017/18 - £3,534,411

2018/19 - £4,464,542

2019/20 - £3,536,940

2020/21 - £4,240,971

5.2.2 Details of the budget surplus received by the Council since the commencement of the shared service arrangements is as follows:

2014/15 - £67,000

2015/16 - £233,000

2016/17 - £95,000

2017/18 - £260,793

2018/19 - £510,421

2019/20 - £125,055

Current expectations are that there will be no budget surplus in 2020/21 or 2021/22 due to reduced case volumes as a consequence of Covid and HBPL's procurement of a new case management system. Future budget surplus received will be disbursed across services proportionate with legal spend.

5.2.3 Any legal income received (e.g. property (legal fees, surveyor fees, solicitor fees), highways, corporate anti-fraud, planning, community safety, etc.) is distributed back to services. Income totals are as follows:

2018/19 - £1,712,228

2019/20 - £413,808

2020/21 - £341,521

5.3 Legal and Constitutional References

5.3.1 Pursuant to the decisions referred to in section 6, the Council entered into Inter Authority Agreements with the London Borough of Harrow for the establishment and continuation of a shared legal service covering the period from 17 August 2012 to 31 August 2022.

5.3.2 The approved arrangement for the Joint Legal Service was that the London Borough of Harrow would discharge this Council's function in respect of the delivery of legal services in accordance with [Section 101 of the Local Government Act 1972](#) and the [Local](#)

[Authorities \(Arrangements for the Discharge of Functions\) \(England\) Regulations 2012.](#)

- 5.3.3 The arrangement is also in accordance with section 113 of the Local Government Act 1972 which provides power for local authorities to place any of their staff at the disposal of another local authority.
- 5.3.4 On [11 September 2012](#) a meeting of Council agreed that the Constitution be amended to reflect the delegation of functions. If Committee agrees to extend the IAA, the delegation of these legal functions for the extended period would also need to be confirmed.
- 5.3.5 [Council Constitution, Article 7 \(Committees, Forums and Working Groups\)](#) sets out the terms of reference of the Policy & Resources Committee and states that the committee is responsible for the strategic direction of the council including strategic partnerships and effective use of resources.
- 5.3.6 The agreement is an inter-authority agreement which comes within the exceptions to public contract procurement rules in Regulation 12 of the Public Contracts Regulations 2015.
- 5.3.7 Under the Authorisation and Acceptance Thresholds in the [Council's Contract Procedure Rules](#), the Policy & Resources Committee as the relevant theme committee can agree to the extension of the agreement.
- 5.3.8 The Committee must also satisfy itself that the extension of the inter-authority agreement meets the Council's best value duty under the Local Government Act 1999 to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness, as well as according with wider fiduciary duties to tax payers.

5.4 **Insight**

5.4.1 N/A

5.5 **Social Value**

5.5.1 N/A

5.6 **Risk Management**

- 5.6.1 Risks will be effectively managed in line with the Council's corporate risk management approach, including via the Council's Client Lead and Contract Manager for the service, and the Strategic Monitoring Board set up pursuant to the inter authority agreement.
- 5.6.2 Extending the existing agreement is low risk as there are established processes and procedures for obtaining legal advice and decision-making. A tendering exercise leading to a change in the identity of the service provider would be higher risk as there would initially be a lack of knowledge of Barnet's policies, procedures and decision making, and in addition there would also be a financial risk as the cost of the legal services required would be likely to be significantly increased

5.7 Equalities and Diversity

- 5.6.1 HBPL are committed to equalities and diversity in their employment practices and are experienced at giving legal advice on any equality and diversity implications of decisions.
- 5.6.2 An Equalities Impact Assessment was conducted in relation to the shared services agreement at its outset, and which contained a phased milestone approach to reviewing equality impacts of the proposals. Any equality issues identified were addressed through an agreed monitoring process.

5.8 Corporate Parenting

- 5.7.1 N/A

5.9 Consultation and Engagement

- 5.9.1 The London Borough of Harrow have been consulted on the extension of the agreement and have confirmed their willingness for this to take place.
- 5.9.2 The London Borough of Harrow have undertaken that any staff placed at the disposal of the Council under section 113 of the Local Government Act 1972 will have been duly consulted prior to being placed at the Council's disposal

6. BACKGROUND PAPERS

- 6.1 Cabinet Resources Committee, 4 April 2012, Legal Shared Service: [Meeting of Cabinet Resources Committee on Wednesday 4th April, 2012, 8.00 pm \(moderngov.co.uk\)](http://moderngov.co.uk/Meeting-of-Cabinet-Resources-Committee-on-Wednesday-4th-April-2012-8.00-pm)
- 6.2 Delegated Powers Report 17 August 2012
[Decision - 1777 - Legal Shared Service with the London Borough of Harrow \(moderngov.co.uk\)](http://moderngov.co.uk/Decision-1777-Legal-Shared-Service-with-the-London-Borough-of-Harrow)
- 6.3 Council, 12 September 2012, Report of the Head of Governance, London Borough of Barnet / London Borough of Harrow Joint Legal Service – Consequential Changes to the Constitution: [Agenda for Council on Tuesday 11th September, 2012, 7.00 pm \(moderngov.co.uk\)](http://moderngov.co.uk/Agenda-for-Council-on-Tuesday-11th-September-2012-7.00-pm)
- 6.4 Policy & Resources Committee, 1 September 2016, Proposed Extension of the Shared Service Agreement with Harrow for the Provision of Legal Services (HBPL): [Agenda for Policy and Resources Committee on Thursday 1st September, 2016, 7.00 pm \(moderngov.co.uk\)](http://moderngov.co.uk/Agenda-for-Policy-and-Resources-Committee-on-Thursday-1st-September-2016-7.00-pm)

KPI No	KPI Description	Frequency	Target	2013/14	2014/15	2015/16	2016/17	2017/18 ¹	2018/19	2019/20 ²	2020/21
HBPL/C1	Acknowledge emails within 1 working day	Quarterly	95.0%	100%	100%	95.7%	87.2%	96.1%	90.7%	85.7%	100%
HBPL/C2	Reply to emails within 5 working days	Quarterly	95.0%	100%	100%	97.9%	100%	94.9%	95.6%	100%	100%
HBPL/C3	Reply to fax or letter within 5 working days	Quarterly	95.0%	100%	100%	100%	100%	100%	100%	100%	100%
HBPL/C4	New instructions assessed and acknowledged within 3 working days	Quarterly	95.0%	100%	95.2%	95.2%	92.3%	93.6%	90.3%	100%	50%
HBPL/C5	Respond to non-urgent requests within 10 working days	Quarterly	95.0%	100%	100%	100%	100%	96.2%	97.1%	100%	100%
HBPL/C6	Respond to further instructions on existing matters within 5 working days	Quarterly	95.0%	100%	100%	97.3%	100%	98.0%	97.1%	100%	100%
HBPL/C7	% of draft committee reports and delegated power reports cleared within 5 working days	Quarterly	95.0%	96.1%	97.7%	98.8%	98.2%	95.0%	Not available	Not available	Not available
HBPL/C8	Overall satisfaction	Quarterly	90.0%	98.2%	96.0%	90.0%	100%	98.4%	96.0%	100%	100%
HBPL/C8a	Satisfaction with performance	Quarterly	90.0%	100%	93.0%	90.0%	100%	97.9%	94.0%	100%	100%
HBPL/C8b	Satisfaction with quality of work	Quarterly	90.0%	98.2%	93.0%	100%	100%	97.9%	100%	100%	100%
HBPL/C8c	Satisfaction with time taken	Quarterly	90.0%	100%	100%	90.0%	100%	100%	94.0%	100%	100%

¹ Only Q2 2017/18 data available

² Only Q2 2019/20 data available

HBPL/C8d	Satisfaction with timeliness of response and completion	Quarterly	90.0%	100%	100%	80.0%	100%	100%	96.0%	100%	100%
HBPL/C9	Appropriate accreditation of the service	Annually Q1	100%	100%	100%	100%	100%	100%	100%	100%	100%
HBPL/C10	Ensure all staff are appropriately qualified	Annually Q3	100%	100%	100%	100%	100%	100%	100%	100%	100%

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Policy & Resources Committee

AGENDA ITEM 13

30 September 2021

Title	Assurance Group Update
Report of	Chairman of Policy and Resources Committee
Wards	All
Status	Public
Urgent	No
Key	No
Enclosures	Appendix A – Proposed new structure chart for the Assurance Group Appendix B – Draft Role Profile, Assistant Director - Assurance
Officer Contact Details	Clair Green – Executive Director of Assurance clair.green@barnet.gov.uk

Summary

This paper gives an update on the recent changes to the strategic and operational expansion of the Assurance Group roles and responsibilities. This includes the adoption of the Barnet Plan through the strategic priority of 'Clean, Safe and Well Run' and associated Assurance Group objectives.

In addition, the paper seeks Committee approval to create, advertise and recruit to an Assistant Director in the Assurance Group.

Officers' Recommendations

That the Committee:

- Note the recent changes to the strategic and operational expansion of the Assurance Group that supports the vision and purpose of the 'Clean, Safe and Well Run' corporate priority.**
- Note and comment on the planned changes within the Assurance Group that aim to support the corporate priority of Clean, Safe and Well Run which will include implementing the outcome of an organisation wide Enforcement review, restructure**

of the Community Safety Team and look to improve governance, oversight, assurance and compliance arrangements.

3. Note that following a formal staff consultation, the new proposed structure of the Community Safety Team will be reported to Constitution and General Purposes Team for approval and implementation in January 2022
4. Note the prior recent change made to an existing post of Assistant Director of Community Safety and Regulatory Services to Assistant Director - Counter Fraud, Community Safety and Protection.
5. Approve the creation of a new Assistant Director - Assurance, as set out in this report; and give authority to recruit to that post on a permanent contract.

1. WHY THIS REPORT IS NEEDED

- 1.1 The Barnet Plan vision is that: 'We care about the borough and want it to be a great place to live, work and visit. Listening to and working with residents and others, we want people to have opportunities to live healthy and fulfilling lives in safe and thriving communities. Providing good quality customer service in all that we do'.
- 1.2 The plan has been developed against the backdrop of COVID-19. This has been an unprecedented national challenge and has a profound impact on both the council organisationally and the Barnet community.
- 1.3 The long-term impacts of the crisis are emerging and will extend beyond the scope of this plan. People and organisations across the borough have had to adapt to new ways of working, living, and providing services in response to the crisis. We will continue to respond to the COVID-19 pandemic and the foundations of that work have been reflected in the plan.
- 1.4 The [Barnet Plan 2021-2025](#) outlines the key outcomes of the council and how it will work to achieve those outcomes. The council and its partners will focus on four priorities over the next four years to realise its' vision:
 - **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.
- 1.5 Under the council's priority of 'Clean, safe and well run' the focus is on:
 - Improving Customer Service
 - Providing better environmental services and a cleaner borough
 - Address issues of anti-social behaviour such as frauds, fly-tipping, noise nuisance and parking
 - Ensure robust financial management
 - Unlocking and optimising the potential of Parks and Open Space

- 1.6 This report gives an overview of the Assurance Group responsibilities as well as the planned developments to ensure it supports the corporate priority of Clean, Safe and Well Run.
- 1.7 Our main vision for Clean, Safe and Well Run is: A place where our streets are clean and anti-social behaviour is dealt with so residents feel safe. Providing good quality, customer friendly services in all that we do.
- 1.8 To support this, the Executive Director of Assurance and the Executive Director of Environment are joint sponsors for the council's priority of Clean, Safe and Well Run. As such have commenced a programme of activities and projects that will to deliver corporate priority.
- 1.9 As an independent and objective department, the Assurance Group is responsible for the delivery and management of all assurance functions as well as providing oversight and assurance to the Council Management Team (CMT) and Members on governance procedures and business processes.
- 1.10 The Assurance Group has expanded its' remit to drive forward the corporate priority, taking responsibilities for additional enforcement, assurance and improvement responsibilities. These areas include:
- Maintaining an appropriate and effective Covid-19 response across the organisation whilst ensuring that a full response can be 'stood up' at any time dependent on national and local situation
 - Taking on the role of Strategic and Client lead for Re Regulatory Services including the upcoming strategic contract review.
 - Undertaking an Enforcement review which includes implementing new ways of working with a 'one team' approach, increase visibility and a place based presence, ensuring the best use of enforcement powers, intelligence handling and reporting.
 - Undertaking a CCTV review - including maintenance and update current CCTV network, project around planned move of the CCTV control room, contract re-procurement exercise including consultation on increasing CCTV coverage. The CCTV review will be reported to the [CLL Committee](#) in October 2021
 - Organisational improvements and assurance work - including implementing a range of corporate and ombudsman complaints developments that will drive business improvements, improve oversight of complaints and increase resident satisfaction with the Council
 - Compliance and Assurance review and associated improvements
 - LGBCE Ward Boundary Review - including associated pre- and post-implementation actions
 - Governance review - which includes implementing best practice recommendation from the Committee on Standards in Public Life and undertaking a self-assessment of the Council's Governance arrangements in accordance with the Centre for Governance and Scrutiny framework.
 - Increased organisational focus on internal control environment and associated key improvement areas as set out within the Annual Governance statement
 - Progress organisational assurance improvements agenda, ensuring highest possible levels of service quality, assurance and governance.

- 1.11 In November 2019 responsibility for Community Safety transferred from the then Executive Director of Environment to the Director of Assurance on an interim basis.
- 1.12 From March 2020 to date the Community Safety Team, supported by CAFT and the Emergency Response Team, have been responding to new Covid-19 Business Enforcement requirements.
- 1.13 In May 2021, a further review took place and the following transfer of services have now been made on a permanent basis. The movement of services was essential to begin to lay the foundations for delivery of the objectives within Clean, Safe and Well-Run priority.
- 1.13.1 Responsibilities as outlined the Community Safety Accreditation scheme of Powers have been retaining within the Assurance Group - Community Safety Team, and include:
- Crime and Disorder Reduction Partnership
 - Environmental Crime
 - Anti-Social Behaviour (ASB)
 - Prevent Agenda (including Hate Crime)
 - CCTV
 - Covid-19 Enforcement
- 1.13.2 The move of some areas into Family Services strengthens transitional support for older adolescents and aligns the good work being undertaken in these areas, plus further maximises opportunities for whole family/system support. Family Services have therefore taken on new areas of responsibility, including
- Domestic violence
 - Violence Against Women and Girls
 - Reduced Offending
 - Integrated Offender Management
 - Violence, Vulnerability and Exploitation
- 1.13.3 Following this review amendments, were made to the role profile of the vacant Assistant Director Community Safety and Head of Counter Fraud Operations merging into a revised role of Assistant Director - Counter Fraud, Community Safety and Protection. Changes to the post were re-evaluated by HR and remain at the same level of Assistant Director.
- 1.13.4 The incumbent post holder of Head of Counter Fraud (who had been covering the vacant Assistant Director post since the beginning of 2020) has been approved by HR for assimilation into this amended post, this change took effect on 1st July 2021. The change in the designation of the post was agreed by the Executive Director of Assurance under delegated powers.
- 1.13.5 We have commenced an organisational enforcement review which aims to increase the visible officer presence on the street alongside improved productivity and outcomes by exploring opportunities for different enforcement operational models, joint working/multi-tasking across the range of functions by creating a creating a specialist investigation and enforcement capability for the council.
- 1.13.6 As part of this review we have increased the size of the Community Safety Team on an interim basis and will be shortly commencing staff consultation a new proposed structure

alongside new way of working. The outcome of this review will be reported to Constitution and General Purposes Team for approval and implementation in January 2022.

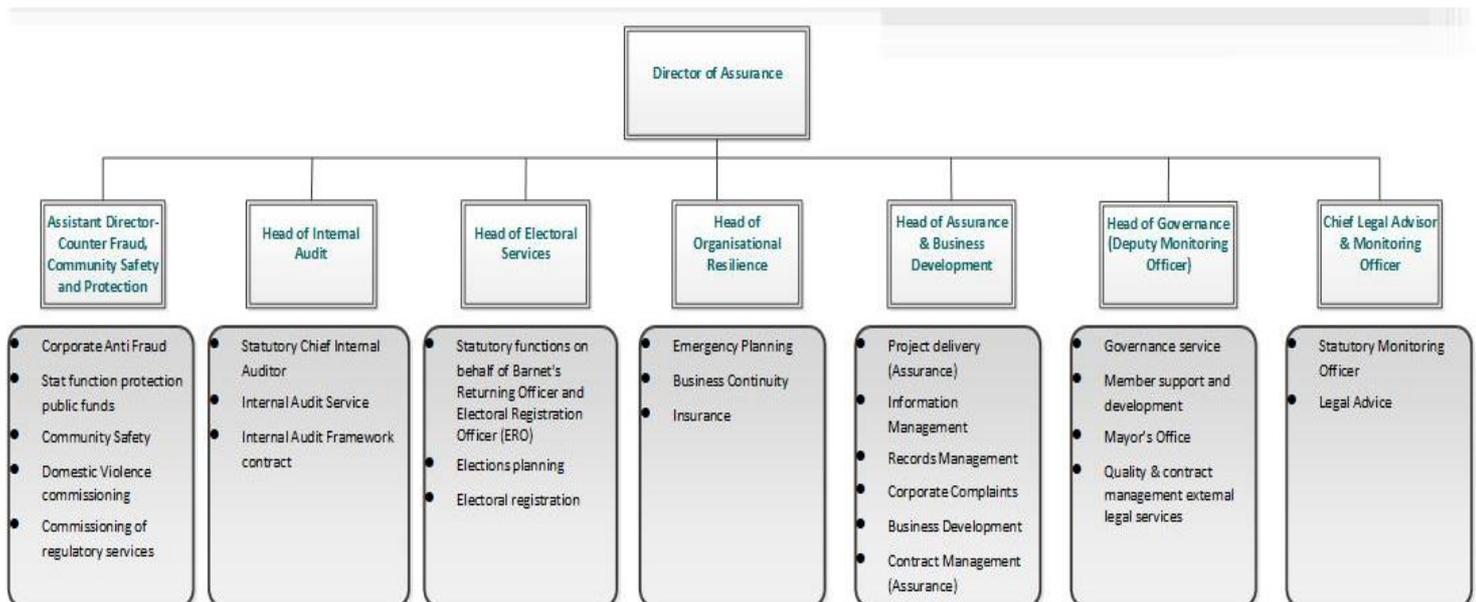
- 1.14 The paper also requests approval for the creation of a new Assistant Director – Assurance role within the Assurance Group and to give authority to recruit to that post on a permanent contract.
- 1.14.1 Over the last three years, many services and associated responsibilities have been subsumed into the Assurance Group, such as Community Safety but also Emergency Planning, Organisational Resilience, Corporate and Ombudsman Complaints and Records and Information Management, however the senior management team has remained flat with all Head of Service posts reporting directly to the Executive Director of Assurance. The creation of a new Assistant Director role will align the Assurance Group management structure more closely with the hierarchy and senior leadership capacity as seen to benefit other directorates.
- 1.14.2 This new post also aims to bring together several current Assurance Group services to provide clear strategic and dynamic leadership along with improvements to collaboration and opportunities for new ways of cross-service working. The proposed job description can be found in Appendix B.
- 1.14.3 By providing additional senior capacity into the Assurance Group, the new Assistant Director will support and deliver the range of workstreams (as set out at 1.10) to enable delivery of the corporate priority.
- 1.14.4 The Assistant Director - Assurance will give strategic direction to the effective delivery of any new and future requirements as set out in the Barnet Plan including driving progress to ensure a consistent organisational assurance continuous improvement agenda, ensuring highest possible levels of service quality, assurance and governance at all times.

2. REASONS FOR RECOMMENDATIONS

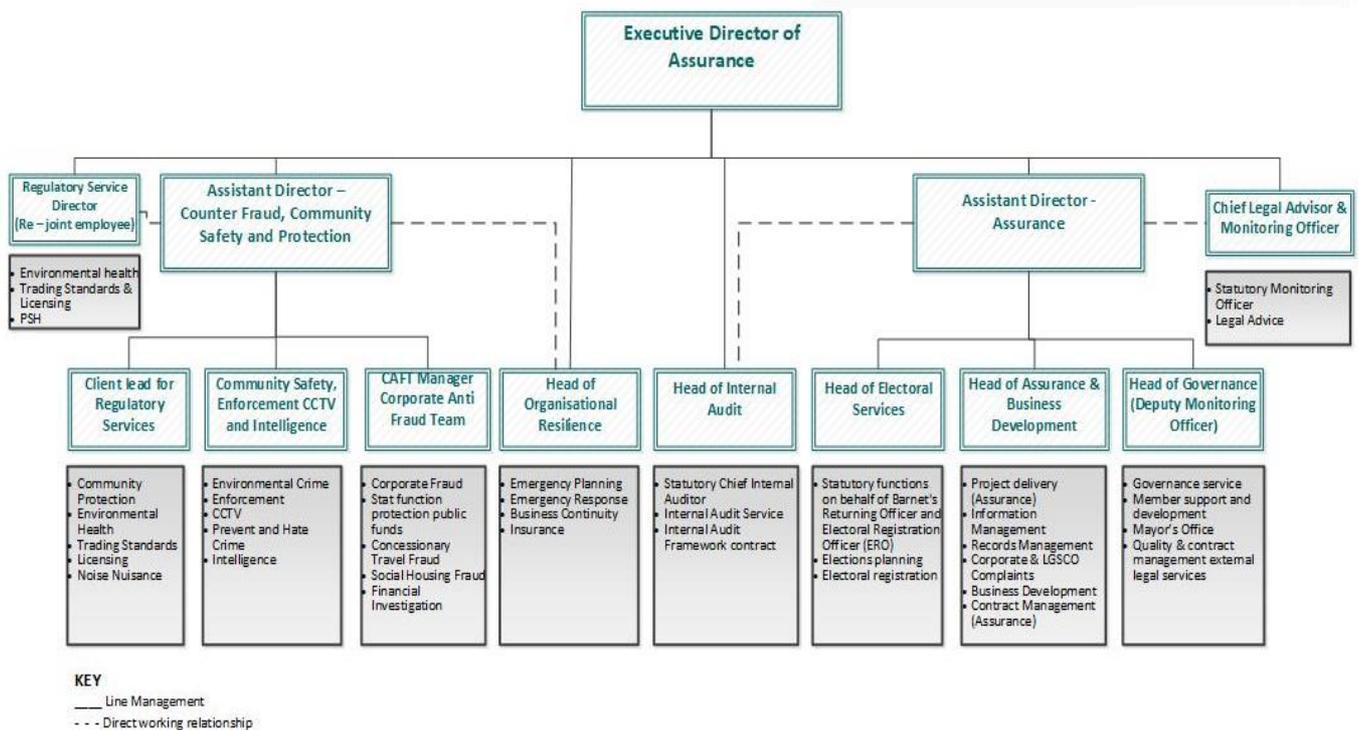
- 2.1 The proposal to create the Assistant Director, Assurance position arises in the wake of significant change and expansion of the remit of the Assurance Group as set out in 1.10.
- 2.2 The service finds itself under significant operational pressure due to current workloads, challenges and projects as set out within the report, as well as the increase in workload following from responding to, and recovering from, Covid-19.
- 2.3 The new post of Assistant Director - Assurance will provide additional capacity and will bring together several current Assurance services to provide clear strategic and operational dynamic leadership to those assurance services along with developing improved collaboration and opportunities for new ways of cross service working.
- 2.4 Reporting to the Executive Director of Assurance, the Assistant Director - Assurance will take lead responsibility for the following:
- Assurance and Business Development - includes, Corporate Complaints, Local Government Ombudsman (LGO) Complaints, Information Governance, Business Improvement, Project and Contract Management (Assurance)

- Electoral Services - includes statutory functions on behalf of Barnet's Returning Officer and Electoral Registration Officer (ERO) including elections planning, electoral registration, polling place and polling district reviews
- Governance - includes Committee System Administration (also known as Democratic Services), Mayors Office and Civic Events
- Act as the Strategic lead for liaison for HBPL (Harrow and Barnet Public Law)
- Act as a key point of liaison and support for the councils 'Monitoring Officer' especially in terms of delivering improvement relating to Governance and constitutional matters
- Act as a key point of liaison and support for the Councils Head of Internal Audit especially in terms of co-ordinating key areas of improvement as set out in the council's Annual Governance Statement
- Lead on relevant associated Assurance Group Barnet Plan priorities, including but not limited to:
 - Organisational improvements and assurance work - including implementing a range of corporate and ombudsman complaints developments that will drive business improvements, improve oversight of complaints and increase resident satisfaction with the Council
 - Compliance and Assurance review and associated improvements
 - LGBCE Ward Boundary Review - including associated pre- and post-implementation actions
 - Governance review - which includes implementing best practice recommendation from the Committee on Standards in Public Life and undertaking a self-assessment of the Council's Governance arrangements in accordance with the Centre for Governance and Scrutiny framework.
 - Increased organisational focus on internal control environment and associated key improvement areas as set out within the Annual Governance statement
 - Progress organisational assurance improvements agenda, ensuring highest possible levels of service quality, assurance and governance at all times

2.5 The current Senior Management structure for the Assurance Group is:



The proposed Assurance Group Structure Chart is as detailed below (also Appendix A):



3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 **Do nothing:** The Policy and Resources Committee could choose to maintain the status quo in respect of the management structure within the Assurance services and not approved the new proposed Assistant Director post. However, this would result in a lack of sufficient leadership capacity to implement the agreed Barnet Plan and associated Assurance priorities. It would also hinder the Assurance service from being able to effectively deal or respond to current workloads, challenges and projects as set out within the report, as well as the increase in workload following from responding to, and recovering from, Covid-19.
- 3.2 In addition, if the Policy and Resources Committee choose not to support the organisation wide Enforcement review, including the restructure of the Community Safety Team and look to improve governance, oversight, assurance, and compliance arrangements this will impact the delivery of the Barnet Plan priority of 'Clean, Safe and Well Run' and associated Assurance Group Objectives.

4. POST DECISION IMPLEMENTATION

- 4.1 Should the Policy and Resources Committee approve the proposed creation of the new Assistant Director (Assurance) post, the role profile will be finalised, advertised, and a

recruitment exercise will be undertaken. The post is expected to be offered based on a permanent contract.

- 4.2 Following staff consultation on the restructure of Community Safety team the final proposed structure will be presented to the Constitution and General Purpose Committee in January 2022 for final approval and implementation.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 The Barnet Plan outlines the council's strategic approach how we will keep Barnet green, the streets clean, and every person in the borough feeling safe and secure - delivering better services while ensuring value for money for all our residents and businesses to approach to provide a fair deal for our residents and a commitment to delivering services that matter most by making decisions to prioritise our limited resources. The aims of this proposal and Assurance Group structure changes support the key aims outlined in the Plan in line with the agreed priority outcomes.

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

- 5.2.1 The grading of the new Assistant Director post to be at Grade 6, within a salary band of £90,866 - £111,178. It is proposed that the post is funded in-year from contingency budgets. The post is expected to be appointed to in December 2021 and be graded at the mid-point of the band (c. £140,000 with on costs). The part year allocation required in 2021/22 will be c.£35,000. It is recommended that the CFO has delegated authority to approve the one-off contingency funding allocation (which will come back to P&R at a later meeting).
- 5.2.2 The longer-term funding for the new Assistant Director - Assurance post is already committed to be funded from on-going Corporate contingency from 2022/23.
- 5.2.3 The current interim structure for Community Safety Team is already funded in-year and the longer-term proposals are included within the 2022/23 budget planning process.

5.3 Social Value

- 5.3.1 N/A

5.4 Legal and Constitutional References

- 5.4.1 In accordance with Appendix A to the Responsibility for Functions sections of the Council's Constitution, the Constitution and General Purposes Committee has responsibilities for staffing matters other than those within the remit of the Chief Officer Appointment Panel.
- 5.4.2 The HR Regulations in the Council's Constitution (Section 2.1) require all new posts at Assistant Director level or above shall be created by Committee decision (the Constitution and General Purposes Committee, Policy and Resources Committee or Urgency Committee) and not by delegated powers.

5.4.3 A decision on the creation of the post of Assistant Director of Assurance was previously included on the agenda for the Policy & Resources Committee on 20 July 2021 but was withdrawn from the agenda. The Leader has requested that the Assurance Group Update report, which includes the creation of that post, be reported back to the Policy & Resources Committee for review and approval. Members of the Constitution & General Purposes Committee will be informed of decisions as required.

5.4.4 Executive Directors only have delegated authority to undertake service restructures affecting less than 20 employees. As these decisions affect all employees in the Assurance Directorate, committee approval is required.

5.4.5 Council Constitution, Article 7, Section 7.5 states that “If any report appears to come within the remit of more than one committee, to avoid the report being discussed at several committees, the report will be presented and determined at the most appropriate committee. If this is not clear, then the report will be discussed and determined by the Policy and Resources Committee.”

5.5 Risk Management

5.5.1 The long-term funding for both the Assistant Director post and Community Safety structure are subject to approval within the 202/23 Budget planning process. It should be considered that making permanent appointments in an uncertain fiscal environment could add to the Council’s revenue pressures.

5.5.2 If the Policy and Resources Committee choose not to support the recommendations within this paper it could impact on the delivery of the Barnet Plan priority of ‘Clean, Safe and Well Run’ and associated Assurance Group Objectives.

5.6 Equalities and Diversity

5.6.1 The 2010 Equality Act outlines the provision 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 from different groups, and
- Foster good relations between people from different groups.

5.6.2 The broad purpose of this duty is to integrate considerations of equality and day to day business and keep them under review in decision making, the design of policies and the delivery of services.

5.6.3 The job description for the Assistant Director role will be evaluated within normal HR practice.

5.6.4 As per any staff restructure, an Equalities Impact Assessment will be completed to assess any possible impact of the Community Safety Team staffing changes.

5.7 Corporate Parenting

5.7.1 The changes have no direct impact on looked after children or care leavers.

5.8 **Consultation and Engagement**

5.8.1 Following the Managing Organisational Change policy, there will be a 30-day staff consultation for the restructure of the Community Safety Team.

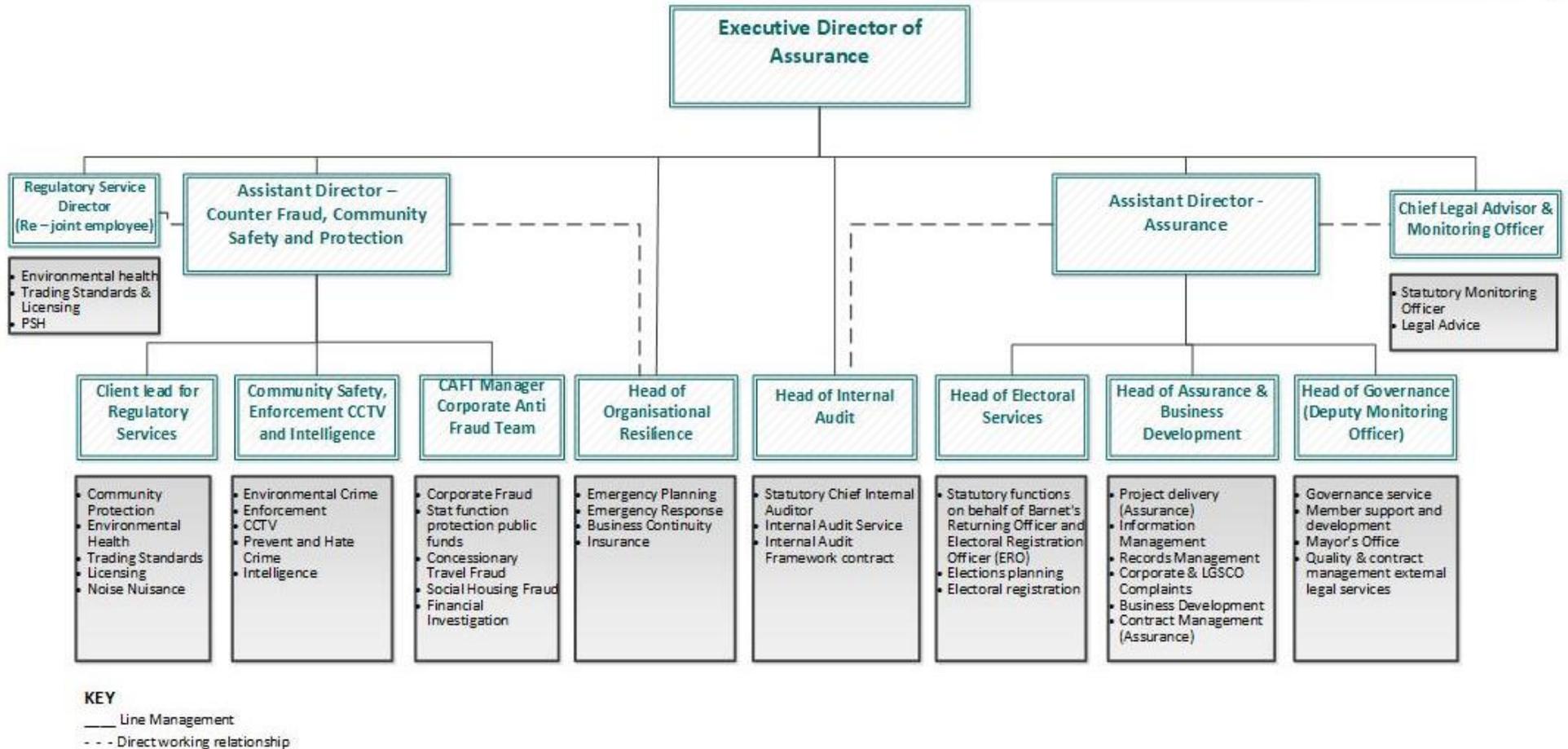
5.9 **Insight**

5.9.1 N/A

6. **BACKGROUND PAPERS**

6.1 [Community Leadership and Libraries Committee - Wednesday 9th June - Community Safety Governance Review](#)

Appendix A – Proposed new structure chart for the Assurance Group



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Role Profile (DRAFT)

Service:	Assurance Group
Job Title:	Assistant Director - Assurance
Grade:	6
Post No.:	TBC
Reports to:	Executive Director of Assurance

1. Purpose of Job:

In line with new Barnet Plan strategic objective of Clean, Safe and Well Run, this newly created post brings together several current Assurance services to create a new portfolio for the post holder.

The post will provide additional capacity and will bring together several current Assurance services to provide clear strategic and operational dynamic leadership to those assurance services along with developing improved collaboration and opportunities for new ways of cross service working.

The aim of this post is to provide clear strategic and operational leadership to those Assurance services along with developing improved collaboration and opportunities for new ways of cross service working. The post holder will also need to develop an organisational assurance continuous improvement agenda, ensuring highest possible levels of service quality to be provided always.

The portfolio covers the following assurance operational areas.

- i. Assurance and Business Development - includes, Corporate Complaints, Local Government Ombudsman (LGO) Complaints, Information Governance, Business Improvement and Project and Contract Management (Assurance)
- ii. Electoral Services - includes statutory functions on behalf of Barnet's Returning Officer and Electoral Registration Officer (ERO) including elections planning, electoral registration, polling place and polling district reviews
- iii. Governance - includes Committee System Administration (also known as Democratic Services), Mayors Office and Civic Events
- iv. Act as a key point of liaison and support for the councils 'Monitoring Officer' especially in terms of delivering improvement relating to Governance and constitutional matters
- v. Act as a key point of liaison and support for the Councils Head of Internal Audit especially in terms of co-ordinating key areas of improvement as set out in the council's Annual Governance Statement

Barnet operates a Committee System of governance. Decisions are made by Full Council, or are delegated to Committees, Theme Committee Chairmen and Chief Officers as set out in Article 10 of the constitution. As such there is a requirement of the post holder to ensure that there is effective member, resident and staff communication and implementation of decisions.

As well as providing guidance to senior managers, elected members, partners, for the services managed making the Council effective and efficient as possible and supporting the council in delivering the Barnet Plan and its overall strategic priority of Clean, Safe and Well Run the post holder will take the lead in the management of high level, high risks and issues within the posts portfolio.

This post will need to consider local and national policy, re-shaping policy to fit within the local environment, turning functional policy into reality where thinking is beyond the year ahead and is open to external influences.

The post holder will have oversight of the delivery of member, public awareness and communication activities and to lead Assurance projects stakeholder consultation for - including with but not limited to: members, residents, electors, staff and statutory bodies.

2. Key accountabilities/duties/responsibilities:

Assurance and Business Development

- To provide strategic leadership and oversight on planning, delivery and coordination of a wide range of Assurance Group services (Information Governance Services, including Information Management and Governance, GDPR, FOI, Transparency and Openness, Records Management, Corporate and LGO Complaints) projects and programmes that have a both a council-wide and borough-wide impact with a key focus on developing an organisational improvement agenda.

Elections

- To provide strategic leadership and oversight to the Council's Elections service ensuring elections are run in accordance with best practice and undertake duties as required by the Returning Officer and Electoral Registration Returning Officer. The post holder will be required to ensure that an ongoing culture of compliance, assurance, transparency and continuous improvement is embedded within the service.

Corporate Governance and Ethical Standards

- To ensure that the Council has in place effective and transparent arrangements for corporate governance and ethical standards that enable the provision of improved outcomes for local people and that are recognised as good practice by our regulators. Due to the complexities of operating a 'committee system' of governance there is also a requirement to continually improve our council's constitutional and decision-making processes to achieve the best results for local people.

Other

- To develop effective working arrangements with the Monitoring Officer and if, required act as the council's Deputy Monitoring Officer (as defined under section 5 of the Local Government and Housing Act 1989) if so, appointed by the Monitoring Officer.
- To ensure that the authority and its members and officers adhere to high standards of behaviour and conduct and prevents the authority from contravening the law or maladministration.
- To develop effective working arrangements with the Head of Internal Audit, especially in terms of co-ordinating key areas of improvement as set out in the council's Annual Governance Statement
- To participate in the Council's emergency planning 'on call' rota and co-ordinate responses to emergency situations as and when required to do so.

- To be honest and above reproach in all dealings, displaying the highest quality standards of professionalism always, maintaining complete confidentiality.
- Ensure full compliance with the Council's Health and Safety policies and maintain a high Health and Safety profile for all the work of the sections.
- To attend appropriate Council Committee meetings, Corporate Officer groups and external meetings and to prepare and present reports for such meetings as appropriate.
- To build and maintain relationships and work effectively with Members, Senior Management, trade unions and all other stakeholders in support of the agreed Service and Corporate objectives.
- Regularly liaise with Committee Chairmen and Ward Members as appropriate.
- To build teams and ensure effective working relationships and managing the learning and professional development for staff within the council's framework.
- To ensure high calibre staff are recruited and developed to deliver service objectives.

Core Accountabilities:

- *Financial and resource management* – Act as the Business and Finance Lead for Assurance Service as well as ensuring that resources are allocated with your own service effectively for the delivery of intended outcomes in manner which demonstrates value for money and compliance with relevant policies and guidelines.
- *Leadership and people management* – Provide strong visible and collective leadership across the council and its partners which builds a culture of high performance, inspires people and supports delivery of the Council's strategic objectives.
- *Customer Experience* – Ensure that there is a clear and consistent focus across the Council and its partners on delivering an inclusive and outstanding customer experience to all citizens and communities of Barnet.
- Respond to internal audit reviews and implementation action plans within agreed deadlines.
- Pro-actively manage capital expenditure, income and revenue expenditure proposals for the service areas managed. Ensure that services provided are managed, monitored and adjusted to meet financial service and business targets in line with Member priorities.
- Be responsible for the contract management of all contracts and projects within your control. This includes certifying payments, certificates and that instructions issued ensure the proper administration of contracts and compliance with financial regulations.
- Establish, develop, and manage systems which maximises income to be obtained from external sources.

Expert and Advisory Accountabilities:

- *Political Management* - providing guidance and support to members in translating their political objectives and priorities into coherent initiatives that will deliver intended outcomes.
- *Professional Leadership* – Provide professional leadership for defined disciplines to ensure that the Council access national best practice and ensure on-going professional development.
- *Policy Development* – Lead the development of policies which support the delivery of corporate objectives and comply with all relevant legislation and statutory requirements within an acceptable level of risk.

Commissioning Accountabilities:

- *Customer and Market Analysis* - Lead analysis of the needs of citizens and communities and the available market provision for a defined range of services to support the commissioning and delivery of best possible outcomes.
- *Service Planning and Design*- Lead the planning and design for a defined range of services to support commissioning and delivery of the best possible outcomes for the citizens and community of Barnet.
- *Service procurement and Contracting* - Lead the procurement and contracting for a designed range of services to ensure they deliver the intended outcomes in a manner which represent long-term value for money at an acceptable level of risk for the Council.
- *Partnership Development* – Contribute to the development of key relationships for the Council with a defined range of external organisations to enable the development of effective outcomes through collaborative, joined-up working.

Delivery Accountabilities:

- *Contract Management* – Lead the management of significant contracts for the Council to ensure service provider compliance with contractual requirements and targets so that the highest possible levels of service quality are provided.
- *Performance Management* – Lead the service delivery of a defined range of services for the Council and partnership ensuring that intended outcomes are being achieved through effective management against key performance indicators.
- *Operational Management* – Lead and drive a culture of continual improvement for the Council and partnership ensuring that business processes are effective and efficient and enable the highest possible levels of service quality to be provided.
- *Programme and Project Management* – Lead strategic programmes and projects for the Council ensuring that they are managed and controlled in an effective manner in order to achieve their intended benefits and goals.

3. Promotion of Corporate Values

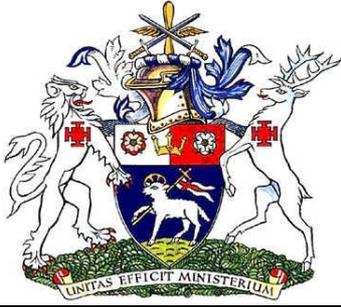
- To ensure that customer care is maintained to the agreed standards according to the council's values. To ensure that a high level of confidentiality is maintained in all aspects of work.

4. Flexibility

- The jobholder may be required to carry out other reasonable duties commensurate with the grade, as requested by the line manager.
- This job description is not exhaustive and may change as the post or the needs of the Council develop. Such changes will be subject to consultation between the post holder and their manager and, if necessary, further job evaluation.

5. The Council's Commitment to Equality

- To deliver the Council's commitment to equality of opportunity in the provision of its services. All staff are expected to promote equality in the work place and in the services the Council delivers.



Policy & Resources Committee

AGENDA ITEM 14

30 September 2021

Title	Local Contact Tracing for COVID
Report of	Chairman of Policy and Resources Committee
Wards	All
Status	Public
Urgent	No
Key	Yes
Enclosures	Appendix A – Chief officer in consultation with committee chairman delegated powers report, Local Contact Tracing for COVID, 13.05.21 Appendix B – Chief officer in consultation with committee chairman delegated powers report, Local Contact Tracing for COVID, 02.08.21
Officer Contact Details	Julie George, Director of Public Health julie.george@barnet.gov.uk 020 8359 4645

Summary

In response to the Coronavirus pandemic, the Urgency Committee on the 27th April 2020 provided delegation to Chief Officers (in consultation with the relevant Committee Chairmen) to take decisions on business-critical matters normally reserved to theme committees. The Committee resolved that any and all such decisions taken, shall be reported back to the relevant Committee for post-decision scrutiny.

This scrutiny report examines the two delegated power reports that were submitted to cover the council's approach in responding to the urgent requirement to establish large-scale local contact tracing service within the borough through the appointment of Capita Regional Enterprise (RE) to establish and operate a service on the council's behalf. The first delegated power report (Appendix A) submission covered the set up of the service. The second

delegated power reports (Appendix B) submission covered the contract extension required before the Policy and Resources committee.

Officers Recommendations

- 1. To note the decisions taken by Chief Officers (in consultation with the relevant Chairmen), via delegated powers in response to the Coronavirus Pandemic, specifically in regards to the local contact tracing service.**

1. WHY THIS REPORT IS NEEDED

- 1.1 The Urgency Committee on the 27th April 2020, provided delegation to Chief Officers (in consultation with relevant Theme Committee Chairman) to take decisions within the remit of that Committee, that needed to be taken in response to the Coronavirus pandemic or other related matters. The Committee resolved that any and all such decisions taken, shall be reported back to the relevant Committee for post-decision scrutiny. This report is pursuant to that requirement.

2. REASONS FOR RECOMMENDATIONS

- 2.1 In response to the recommendations agreed by the Urgency Committee on the 27th April 2020.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 Considerations were made as to whether the local authority could go to market to procure the service. However, due to time constraints created by the national requirement to set up local contact tracing within a matter of weeks, going to market was not an option. Barnet Council were also in a position to utilise the Special Project Initiation Request (SPIR) framework within the existing main contract with Capita Re who provide the Barnet professional Environmental Health Services (EHO). EHOs already provide local contact tracing for some conditions other than COVID and have the professional expertise to run the service. Using this approach also enable Capita to redirect some Business-as-Usual resources to assist with the setup, enabling an earlier start to the service. For these reasons, Capita Re were considered the best option over any other.

4. POST DECISION IMPLEMENTATION

- 4.1 The Local Contact Tracing Service will be delivered until such point as the requirement for local authorities to provide the service change. This will be continually reviewed in light of Public Health policy landscape. If a service is required beyond the current SPIR extension, usual procurement procedures will be followed to extend the service.

5. IMPLICATIONS OF DECISION

- 5.1 **Corporate Priorities and Performance**

5.1.1 During the emergency period, the Council moved to delivering critical services only and undertook additional responsibilities required by Government while aiming to continue to deliver as many elements of the Corporate Plan (Barnet 2024) as possible. Now that the remainder of the London Borough of Barnet are moving mainly back to business as usual, the Public Health team are continuing to provide a COVID response, including maintenance of the local contact tracing service.

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

5.2.1 Appendix A (Section 5.2 pg.10-11) shows where the funding for the service was sourced from through the Contain Outbreak Management Fund provided by the Department of Health and Social Care. It establishes the fixed start-up costs (£319,489) and variable monthly costs of (£45,279). It also summarises the staffing capacities and outputs of the service. Please see Appendix A for more detail.

5.2.2 Appendix B (Section 5.2 pg.20-21) outlines the current maximum cost over the entire period of the service including the SPIR extension (December 2020 to March 2022) is £1,197,016. It also summarises the staffing capacities and outputs of the service. Please see Appendix B for more detail.

5.3 **Social Value**

5.3.1 N/A

5.4 **Legal and Constitutional References**

5.4.1 The Council's Constitution, Article 7 (Committees, Forums and Working Groups) – the terms of reference of the Policy & Resources Committee include "...to be responsible for those matters not specifically allocated to any other committee affecting the affairs of the Council." The terms of reference of the Health & Wellbeing Board include "...Overseeing public health and promoting prevention agenda across the partnership."

5.4.2 The Urgency Committee on the 27th April 2020 provided delegation to Chief Officers (in consultation with relevant Theme Committee Chairman) to take decisions within the remit of that Committee, that needed to be taken in response to the Coronavirus pandemic or other related matters.

5.4.3 Chief Officers making decisions using the delegations approved via the Urgency Committee report need to record all decisions via a Delegated Powers Report. Decisions should record that consultation has taken place with the relevant Chairman with a copy of the report published to the Council's website and circulated to members of the relevant committee for information.

5.5 **Risk Management**

5.5.1 Regularising emergency decisions taken and providing a delegation to officers to decide matters normally reserved to committees enables the business of the Council to continue whilst maintain the appropriate level of Member oversight and decision recording.

5.6 Equalities and Diversity

- 5.6.1 The service specification for Local Contact Tracing is set nationally and therefore is set to with all groups in consideration.
- 5.6.2 We have ensured that we have access to interpreting services to ensure we can communicate with people from different ethnic groups who may not have English as a first language.
- 5.6.3 We are currently working on better access for people who are hard of hearing.
- 5.6.4 In making these decisions officers have had regard to the public-sector equality duty. 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 decision makers have regard to the statutory grounds in the light of all available material.

5.7 Corporate Parenting

- 5.7.1 The service is operated in accordance with the requirements of National Test and Trace Service. As outlined in both Delegated Powers Report attached as appendix A (Section 5.8 pg.12) and B (Section 5.8 pg.22).

5.8 Consultation and Engagement

- 5.8.1 N/A

5.9 Insight

- 5.9.1 Analysis of positive test numbers and the number of cases transferred to the Local Contact tracing service was analysed to understand the likely number of calls the Local Test & Trace service were likely to be able to make. This analysis was undertaken by ward and compared to the wards which had consistently high case rates.
- 5.9.2 As capacity within the local team was exceeded by case numbers requiring local contact tracing, we were able to prioritise the wards which the local team would focus on, with the emphasis placed on local areas where a strong offer of support could make a difference to individuals' ability to self-isolate.
- 5.9.3 The caseload and the capacity of the team were monitored weekly using the internally created dashboard which allowed the local contact tracing team to adapt staffing in consultation with Barnet Public Health.

6. BACKGROUND PAPERS

- 6.1 Urgency Committee 27th April 2020, Approval of Emergency Decisions and Delegation to Chief Officers report:
<https://barnet.moderngov.co.uk/documents/s58641/Urgency%20Committee%20-%20Emergency%20Decisions%20Final.pdf>

APPENDIX A

	<h3>CHIEF OFFICER IN CONSULTATION WITH COMMITTEE CHAIRMAN DELEGATED POWERS REPORT</h3>
Title	Local Contact Tracing for COVID
Report of	Director of Public Health (in consultation with the Leader and Chairman of the Health & Wellbeing Board)
Wards	All
Status	Public
Enclosures	None
Officer Contact Details	Julie George julie.george@barnet.gov.uk 020 8359 4645

<h2>Summary</h2>
<p>This report sets out the council's approach in responding to the urgent requirement to establish large-scale local contact tracing service within the borough and seeks approval to that approach, including the appointment of Capita Regional Enterprise (RE) to establish and operate the service on the council's behalf.</p>
<h2>Decisions</h2>
<p>1. Approve the arrangements that have been put in place to meet the council's obligations in local contact tracing.</p>
<p>2. Approve the appointment of Capita RE to provide the service.</p>

1. WHY THIS REPORT IS NEEDED

1.1. At its meeting on 27th April 2020, the Council's Urgency Committee

agreed the following recommendation:

“That the Committee delegate authority to Director of Public Health in consultation with the Chairman of the Health & Wellbeing Board any matters within the remit of the Board and public health related matters that need to be taken in response to the Coronavirus pandemic or other related matters, or in response to directions given by HM Government, London Strategic Coordination Group and London Local Authority Gold. In the event of the Chairman’s absence, the Board Vice-Chairman and Leader shall be consulted. Any and all such decisions shall be reported back to Committee for post-decision scrutiny.”

- 1.2. In September 2020, the council was asked to establish a pilot local contact tracing service to complement the national NHS Test and Trace service, to be operational by latest end of November 2020 and funded from the Contain Framework Funding. The council’s Deputy Director of Public Health was tasked with leading on this piece of work, working closely with the commercial team and other council colleagues and the Council’s regulatory services partner, Re. Partnership with RE was pursued because Environmental Health Services are delivered, on the Council behalf, by RE, at the time. The council’s proposal for local contact tracing service was accepted by the NHS Local Tracing Partnerships on 26.11.21, with go live date of 4th December approved by on 1st December 2020.
- 1.3. The initial focus was developing the service specification in line with well-established health protection principles of contact tracing conducted by professionally trained workforce such as Barnet’s Environmental Health Officer-led service responsive to local residents’ which provided good analytics into service delivery as well as meet the constantly changing national service requirements.
- 1.4. The project team consulted with other London local authorities as well as the local contact tracing partnership about possible models of delivery and challenges faced with different approaches used across London.
- 1.5. Negotiations with Capita to agree a SPIR for the RE contract covering Barnet’s regulatory services has started in November 2020 and was completed at the end of March 2021, although the local contact tracing service has been provided in pilot form from early December 2020, using commercial cover. The initial estimate (ROM – rough order of magnitude) was £605,825, excluding on-going IT costs. The agreed SPIR includes fixed and start-up costs (£319,489), monthly staffing costs which will vary based on the agreed service level (£45,279), monthly fixed costs for IT and licensing (£1012), and variable costs which include IT support, delivery of additional leaflets above agreed minimum and additional IT systems development costs if required. The contract runs from December to August.

Current maximum costs are projected to be £842,878 due in large part on-going extended IT support needed to respond to national changes to IT systems. Due to uncertainty with ongoing requirements and changing nature of the pandemic, it was mutually agreed to review SPIR periodically.

1.6. Key elements of the service contracted are:

- A contact tracing team with additional recruitment of professional workforce from public health, environmental health, other related disciplines or with previous experience in the national Test and Trace service
- A professionally qualified Environmental Health Officer (EHO) service manager
- A Customer Relations Management (CRM) IT system created to capture key information to provide insight to help inform the COVID and local contact tracing response
- Analytic dashboards covering operational delivery, insight for public health and KPI for contract management
- Links to sources of support for self-isolation including financial and other forms of support
- Use of translated materials and access to interpreters where needed
- Outgoing email and SMS message sent as soon as the case is assigned encouraging residents to ring the contact tracing service
- Inbound telephone number where people can ring (which the national service does not provide)
- Calling card delivered to resident's address if contact cannot be made on the first day
- On-going quality improvement meetings to continue to meet changes national requirements and local improvements including closer working between isolation support and contact tracing.

2. REASONS FOR RECOMMENDATIONS

2.1. The urgency of the requirement to set up a local contact tracing pilot, a highly complex service which needed to meet national requirements required a rapid response from the council. Having assessed the various options for delivering the requirement, it was concluded that appointing our local regulatory services partner RE was the only option that would meet DHSC and Public Health requirements, given that EHO professional services were already being delivered by RE, on behalf of the Council.

2.2. Whilst this report seeks retrospective confirmation of decisions that were made in an emergency, it should be noted that both the Director of Public Health and the Chief Executive were engaged fully in that process.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

3.1. The project group considered the options of redeployment of existing council staff into a service under public health leadership or using the customer services contact centre. However, it was anticipated that the council will be asked to maintain this service long term so the redeployment option was not viable, especially given the capacity of public health to supervise the service in the run up and during the second wave of the pandemic. The option to use the customer services contact staff was also discounted because of the need to have professional supervision to meet the technical requirements of this service.

3.2. The tendering option on the open market was not pursued because of the urgency to mobilise the service offer, and the fact that specialist expertise needed to deliver services were already available in RE and Capita. In addition, the requirements from government and the solution have been and are still developing through a process of iteration, requiring a high degree of collaboration which was thought to be best afforded through the existing partnerships with RE and Capita. This option also enabled us to recruit staff with knowledge or experience in public health, environmental health or previous contact tracing experience, including environmental health students from Middlesex University.

4. POST DECISION IMPLEMENTATION

4.1 The operation of the local contact tracing service will continue to be reviewed, both through quality improvement meetings and the more formal monthly contract review meetings. The SPIR, funded by the Containment Outbreak Management Fund, currently runs until the end of August 2021. The terms of the 2021/22 Public Health Grant indicate that a local contact tracing service will continue to be required over the coming year however, current funding within PH Grant is not sufficient to continue funding current local model. National discussions are taking place on the future of the national NHS Test and Trace and expectations of local government to support contact tracing as well as assurance that responsibilities, if transferred to local government, will be adequately resourced.

4.2 The service is participating in a pilot project to contact cases as soon as test results become available which is so far working well. This pilot will help inform the shape of the service going forward and will be ceased on 30th April.

5. IMPLICATIONS OF DECISION

5.1. Corporate Priorities and Performance

5.1.1. The provision of local contact tracing will assist the council contain local outbreaks of the COVID-19 and manage the next phase of the pandemic.

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

5.2.1. The local contact tracing pilot has been funded by the Contain Outbreak Management Fund provided by the Department of Health and Social Care. As mentioned above, The agreed SPIR includes fixed start-up costs (£319,489), monthly costs which will vary based on the agreed service level and agreed IT service support (£45,279) and variable costs which include additional IT systems development if required.

5.2.2. Staff on substantive contracts include the service lead and 3 shift supervisors, while the contact tracers are on temporary contracts paid based on shifts worked.

5.2.3. The throughput was estimated at a base level of 28 cases, surge level of 125 and a super-surge level of 160 cases per week. At the peak of the second wave the service managed in excess of the super-surge numbers, which were agreed between the Contact Tracing Service Manager and Public Health.

5.2.4. The service has responded to 1,951 cases in the current year to date, with 108 over the last full month. In the local zero pilot, where the team have undertaken all contact tracing for COVID cases resident in Barnet, the team achieved 90% contact success, a 4% increase on the national teams contact success, indicating the value of the local service.

5.3. Legal and Constitutional References

5.3.1 Council Constitution, Article 7 (Committees, Forums and Working Groups) – the terms of reference of the Policy & Resources Committee include “...to be responsible for those matters not specifically allocated to any other committee affecting the affairs of the Council.” The terms of reference of the Health & Wellbeing Board include “...Overseeing public health and promoting prevention agenda across the partnership.”

5.3.2 The Urgency Committee on the 27th April 2020 provided delegation to Chief Officers (in consultation with relevant Theme Committee Chairman) to take decisions within the remit of that Committee, that needed to be taken in response to the Coronavirus pandemic or other related matters.

5.3.3 Chief Officers making decisions using the delegations approved via the Urgency Committee report need to record all decisions via a Delegated Powers Report. Decisions should record that consultation has taken place with the relevant Chairman with a copy of the report published to the Council's website and circulated to members of the relevant committee for information.

5.3.4 COVID-19 is a dangerous disease and the pandemic poses a significant risk to life.

Regulation 32(2)(c) of the Public Contracts Regulations 2015 (as amended) (PCR) is designed to deal with this sort of situation.

Regulation 32(2) states that a direct contract award can be made without prior publication:

- insofar as is strictly necessary where, for reasons of extreme urgency brought about by events unforeseeable by the contracting authority, the time limits for the open or restricted procedures or competitive procedures with negotiation cannot be complied with.
- the circumstances invoked to justify extreme urgency must not in any event be attributable to the contracting authority.

The current serious health impact of the COVID-19 pandemic coupled with the urgent government mandated requirement to set up large-scale asymptomatic testing sites to support the national and local pandemic response justifies reliance on Regulation 32 (2) to make these direct contracts awards to Number 8 Events Ltd and QMatic.

5.4. **Insight**

5.4.1. Data on infection rates was used to assess the likely capacity required for the contact tracing team over the duration of the contract as well as identifying languages required for translated materials.

5.4.2. An insight dashboard has been developed by the Insight & Intelligence Hub which is reviewed regularly to support decision making within the service.

5.4.3. A KPI dashboard for contract monitoring has been developed to inform the contract monitoring discussions.

5.5. **Social Value**

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5.6. **Risk Management**

Operational risk management are the responsibility of RE, are covered within the agreed SPIR and reviewed at contract meetings.

5.7. **Equalities and Diversity**

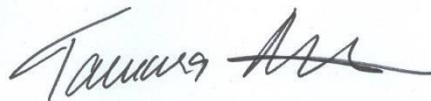
5.7.1 Interpretation and translation is available for any local resident who cannot answer the questions in English. Individuals can complete the information via the national contact tracing website if that process is more suitable for them.

5.8. **Corporate Parenting**

5.8.1 The service is operated in accordance with the requirements of National Test and Trace Service. Where a case lives in a complex setting such as a children's home, to date the contact tracing has been done either by the regional health protection team or the local Public Health Department.

5.9. **Consultation and Engagement**

5.9.1. Not applicable.



Signed:

Designation: Director of Public Health and Prevention

Date: 13 May 2021



Signed:

Designation: Leader of the Council

Date: 13 May 2021

APPENDIX B

	<h1>CHIEF OFFICER IN CONSULTATION WITH COMMITTEE CHAIRMAN DELEGATED POWERS REPORT</h1>
Title	Local Contact Tracing for COVID
Report of	Director of Public Health (in consultation with the Leader and Chairman of the Health & Wellbeing Board)
Wards	All
Status	Public
Enclosures	None
Officer Contact Details	Julie George julie.george@barnet.gov.uk 020 8359 4645
<h2>Summary</h2>	
<p>This DPR documents the decision to extend the current contract with RE for the provision of local contact tracing until 31st March 2022, should the service continue to be required, via a single tender action.</p> <p>The DPR for the original local contract tracing Special Project Initiation Request (SPIR) through the contact with Capita Regional Enterprise (RE) was agreed in May 2021. The decision to use the existing contract with RE, was to enable the Council to respond quickly to the urgent requirements to establish large-scale local tracing services within the Borough.</p> <p>This report outlines the reasons why a further extension to the local contract tracing SPIR with RE is required.</p>	
<h2>Decisions</h2>	
<p>Approve the continuation of arrangements for local contract tracing to be provided through the SPIR with RE for a further 3 months, with an option to extend until 31st March 2022, should the service continue to be required.</p>	

1. WHY THIS REPORT IS NEEDED

- 1.1 At its meeting on 27th April 2020, the Council's Urgency Committee agreed the following recommendation:

"That the Committee delegate authority to Director of Public Health in consultation with the Chairman of the Health & Wellbeing Board any matters within the remit of the Board and public health related matters that need to be taken in response to the Coronavirus pandemic or other related matters, or in response to directions given by HM Government, London Strategic Coordination Group and London Local Authority Gold. In the event of the Chairman's absence, the Board Vice-Chairman and Leader shall be consulted. Any and all such decisions shall be reported back to Committee for post-decision scrutiny."

- 1.2 In September 2020, the council was asked to establish a pilot local contact tracing service to complement the national NHS Test and Trace service, to be operational by latest end of November 2020 and funded from the Contain Framework Funding. The council's Deputy Director of Public Health was tasked with leading on this piece of work, working closely with the commercial team and other council colleagues and the Council's regulatory services partner, Re. Partnership with RE was pursued because Environmental Health Services are delivered, on the Council behalf, by RE, at the time. The council's proposal for local contact tracing service was accepted by the NHS Local Tracing Partnerships on 26.11.21, with go live date of 4th December approved by on 1st December 2020.
- 1.3 The initial focus was developing the service specification in line with well-established health protection principles of contact tracing conducted by professionally trained workforce such as Barnet's Environmental Health Officer-led service responsive to local residents' which provided good analytics into service delivery as well as meet the constantly changing national service requirements.
- 1.4 The project team consulted with other London local authorities as well as the local contact tracing partnership about possible models of delivery and challenges faced with different approaches used across London.
- 1.5 Negotiations with Capita to agree a Special Project Initiation Request (SPIR) for the RE contract covering Barnet's regulatory services had started in November 2020 and was completed at the end of March 2021, although the local contact tracing service had been provided in pilot form from early December 2020, using commercial cover. The initial estimate (ROM – rough order of magnitude) was £605,825, excluding on-going IT costs. The agreed SPIR included fixed and start-up costs (£319,489), monthly staffing costs which varied based on the agreed service level (£45,279), monthly fixed costs for IT and licensing (£1012), and variable costs which include IT support, delivery of additional leaflets above agreed minimum and additional IT systems development costs if required. The contract runs from December 2020 to August 2021. The maximum costs for the original SPIR were projected to be £842,878 due in large part on-going

extended IT support needed to respond to national changes to IT systems. The maximum costs to extend the SPIR to the end of March 2022 is projected to be a further £354,138, leading to an overall maximum cost of the providing the service of £1,197,016.

1.6 Due to uncertainty with ongoing requirements and changing nature of the pandemic, it was mutually agreed to review the SPIR periodically.

1.7 Key elements of the service contracted are:

- A contact tracing team with additional recruitment of professional workforce from public health, environmental health, other related disciplines or with previous experience in the national Test and Trace service
- A professionally qualified Environmental Health Officer (EHO) service manager
- A Customer Relations Management (CRM) IT system created to capture key information to provide insight to help inform the COVID and local contact tracing response
- Analytic dashboards covering operational delivery, insight for public health and KPI for contract management
- Links to sources of support for self-isolation including financial and other forms of support
- Use of translated materials and access to interpreters where needed
- Outgoing email and SMS message sent as soon as the case is assigned encouraging residents to ring the contact tracing service
- Inbound telephone number where people can ring (which the national service does not provide)
- Calling card delivered to resident's address if contact cannot be made on the first day
- On-going quality improvement meetings to continue to meet changes national requirements and local improvements including closer working between isolation support and contact tracing.

1.8 When the initial contract was set, the initial hope was that the requirement for local contact tracing would no longer be required by August 2021. Unfortunately, this has not proved the case. WHO has not declared the pandemic over. In Barnet, the COVID case rates are currently at similar or higher levels as were seen in December 2021. The provision of a local contact tracing service continues to be needed to support the pandemic response.

1.9 There also continues to be considerable uncertainty about what will be required of local authorities around local contact tracing as part of the changes being brought in with the creation of the UK Health Security Agency (UKHSA). To date there has been no definitive guidance on what will be required, which makes any medium to longer term planning particularly challenging. Continuing the current arrangements while the national requirements are clarified is considered to be the most efficient approach to meeting existing and future obligations.

- 1.10 Procurement have advised that a single tender action is an appropriate contracting arrangement to extend the SPIR with Re for continuation of the local contact tracing service.

2. REASONS FOR RECOMMENDATIONS

- 2.1 The original urgency of the requirement to set up a local contact tracing pilot, a highly complex service which needed to meet national requirements, required a rapid response from the council. Having assessed the various options for delivering the requirement, it was concluded that appointing our local regulatory services partner RE was the only option that would meet DHSC and Public Health requirements, given that EHO professional services were already being delivered by RE, on behalf of the Council.
- 2.2 The service provided by RE has been responsive and efficient, with regular changes to requirements both in terms of capacity and approach made by mutual agreement. Given the high levels of uncertainty around future requirements both in terms of national requirements of local authorities and development of the pandemic, continuation of the existing service should continue until at least confirmation of the national requirements.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 The project group considered the options of redeployment of existing council staff into a service under public health leadership or using the customer services contact centre. However, it was anticipated that the council will be asked to maintain this service long term so the redeployment option was not viable, especially given the capacity of public health to supervise the service in the run up and during the second wave of the pandemic. The option to use the customer services contact staff was also discounted because of the need to have professional supervision to meet the technical requirements of this service.
- 3.2 The tendering option on the open market was not pursued because of the urgency to mobilise the service offer, and the fact that specialist expertise needed to deliver services were already available in RE and Capita. In addition, the requirements from government and the solution have been and are still developing through a process of iteration, requiring a high degree of collaboration which was thought to be best afforded through the existing partnerships with RE and Capita. This option also enabled us to recruit staff with knowledge or experience in public health, environmental health or previous contact tracing experience, including environmental health students from Middlesex University.

4. POST DECISION IMPLEMENTATION

- 4.1 The operation of the local contact tracing service will continue to be reviewed, both through quality improvement meetings and the more formal monthly contract monitoring meetings. The SPIR, funded by the Containment Outbreak Management Fund, currently runs until the end of August 2021.

- 4.2 With approval via this DPR, the SPIR will be varied in the first instance by 3 months to end of November with a further variation to end of March undertaken if required.
- 4.3 The terms of the 2021/22 Public Health Grant indicate that a local contact tracing service will continue to be required over the coming year. However, current funding within PH Grant is not sufficient to continue funding current local model. National discussions are taking place on the future of the national NHS Test and Trace and expectations of local government to support contact tracing as well as assurance that responsibilities, if transferred to local government, will be adequately resourced. It is expected that further detail on requirements of local authorities and relationships with the UKHSA will be confirmed during the autumn.
- 4.4 The DPR will be taken to the Policy and Resources committee at the next opportunity for post decision scrutiny.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 The provision of local contact tracing will assist the council in containing local outbreaks of the COVID-19 and continue to manage the next phase of the pandemic.

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

- 5.2.1 The local contact tracing pilot has been funded by the Contain Outbreak Management Fund provided by the Department of Health and Social Care. As mentioned above, the agreed SPIR includes fixed start-up costs (£319,489), monthly costs which will vary based on the agreed service level and agreed IT service support (£45,279) and variable costs which include additional IT systems development if required. The current maximum cost over the entire period (December 2020 to March 2022 is £1,197,016).
- 5.2.2 The month to month costs of the service have varied depending on staffing levels (in response to case rates in Barnet) and IT developments needed to keep up with the national requirements of Test and Trace.
- 5.2.3 Staff on substantive contracts include the service lead and currently 2 shift supervisors, while the contact tracers are on temporary contracts paid based on shifts worked.
- 5.2.4 The throughput was estimated at a base level of 28 cases, surge level of 125 and a super-surge level of 160 cases per week. Staff are currently responding to about 20 cases a day or 140 cases a week, with the National Test and Trace responding to the other cases. The team will start to focus on wards in the most deprived parts of the Borough where the local offer of support may make the greatest difference in

enabling individuals to self-isolate to maximize the value of having a local service.

5.3 Legal and Constitutional References

5.3.1 Council Constitution, Article 7 (Committees, Forums and Working Groups) – the terms of reference of the Policy & Resources Committee include “...to be responsible for those matters not specifically allocated to any other committee affecting the affairs of the Council.” The terms of reference of the Health & Wellbeing Board include “...Overseeing public health and promoting prevention agenda across the partnership.”

5.3.2 The Urgency Committee on the 27th April 2020 provided delegation to Chief Officers (in consultation with relevant Theme Committee Chairman) to take decisions within the remit of that Committee, that needed to be taken in response to the Coronavirus pandemic or other related matters.

5.3.3 Chief Officers making decisions using the delegations approved via the Urgency Committee report need to record all decisions via a Delegated Powers Report. Decisions should record that consultation has taken place with the relevant Chairman with a copy of the report published to the Council’s website and circulated to members of the relevant committee for information.

5.3.4 COVID-19 is a dangerous disease and the pandemic poses a significant risk to life.
Regulation 32(2)(c) of the Public Contracts Regulations 2015 (as amended) (PCR) is designed to deal with this sort of situation.

Regulation 32(2) states that a direct contract award can be made without prior publication:

- insofar as is strictly necessary where, for reasons of extreme urgency brought about by events unforeseeable by the contracting authority, the time limits for the open or restricted procedures or competitive procedures with negotiation cannot be complied with.
- the circumstances invoked to justify extreme urgency must not in any event be attributable to the contracting authority.

The current serious health impact of the COVID-19 pandemic coupled with the urgent government mandated requirement to set up local contact tracing to support the national and local pandemic response justifies reliance on Regulation 32 (2) to make the original award and the SPIR variation with Re.

5.4 **Insight**

5.4.1 Data on infection rates was used to assess the likely capacity required for the contact tracing team over the duration of the contract as well as identifying languages required for translated materials.

5.4.2 An insight dashboard has been developed by the Insight & Intelligence Hub which is reviewed regularly to support decision making within the service.

5.4.3 A KPI dashboard for contract monitoring has been developed to inform the contract monitoring discussions.

5.5 **Social Value**

Not applicable.

5.6 **Risk Management**

5.6.1 Operational risk management are the responsibility of RE, are covered within the agreed SPIR and reviewed at contract meetings.

5.6.2 Strategic risks are owned by Public Health and have been identified as continuing providing a service despite the considerable policy and pandemic uncertainty. Continuing to contract with the existing strategic partner until there is greater clarity about the national policy for local authorities is a key mitigation of this risk.

5.7 **Equalities and Diversity**

5.7.1 Interpretation and translation is available for any local resident who cannot answer the questions in English. Individuals can complete the information via the national contact tracing website if that process is more suitable for them.

5.8 **Corporate Parenting**

5.8.1 The service is operated in accordance with the requirements of National Test and Trace Service. Where a case lives in a complex setting such as a children's home, to date the contact tracing has been done either by the regional health protection team or the local Public Health Department.

5.9 Consultation and Engagement

5.9.1 Not applicable

6. **BACKGROUND PAPERS**

6.1 None appended

7. **DECISION TAKER'S STATEMENT**

7.1 *I have the required powers to make the decision documented in this report. I am responsible for the report's content and am satisfied that all relevant advice has been sought in the preparation of this report and that it is compliant with the decision-making framework of the organisation which includes Constitution, Scheme of Delegation, Budget and Policy Framework and Legal issues including Equalities obligations. The decision is compliant with the principles of decision making in Article 10 of the constitution.*

Chairman: Cllr Daniel

Thomas Signed:

**Chairman of Policy
and Resources Committee**

Dated: 31.7.21

Chief Officer: Cath Shaw

Signed: Deputy Chief

Executive Dated: 2.8.21



Policy and Resources Committee

30th September 2021

Title	Post-decision scrutiny cover report for Carers and Young Carers Support Services DPR Waiver.
Report of	Chairman of Policy and Resources Committee
Wards	All
Status	Public
Urgent	Yes
Key	Yes
Enclosures	Appendix 1- Waiver to extend the Barnet Carers and Young Carers Support Services contract by a further 6 months from 3 rd October 2021 until 31 st March 2022.
Officer Contact Details	Sameen Zafar, Health and Social Care Commissioner Sameen.Zafar@Barnet.gov.uk Sarah Perrin, Head of Commissioning for Mental Health & Dementia, Sarah.Perrin@Barnet.gov.uk

Summary

Carers and young carers support services deliver a range of preventative support to adult and young carers in Barnet. On 16th February 2016 the Policy and Resources Committee agreed to authorise the procurement of carers and young carers support services and the services were put out to tender on 22nd April 2016. Following a competitive procurement process, it was recommended that the contract was awarded to Barnet Carers Centre (BCC). The contract term was for three years from 3rd October 2016 to 2nd October 2019 with the option to extend for a further two years, subject to performance and finances.

The contract is an integrated contract for both Adult Social Care and Family Services. The total contract value for the initial 3-year term of the contract was £1,171,999, with a total global contract value of up to £1,937,048 in the event the contract was extended by up to a further two years. In July 2019 a two-year extension with the provider was agreed and the current contract

is due to end on 2nd October 2021.

The DPR report attached (Appendix A) sought authorisation for a waiver to extend past the initial extension term by a further 6 months from 3rd October 2021 until 31st March 2022. This extension was requested on the basis that the Covid 19 pandemic delayed procurement of a new contract and would allow a full competitive procurement exercise to be undertaken. The new contract for carers and young carers support services will be in place following the procurement process being completed for 1st April 2022.

Officers Recommendations

- 1. That the Committee note the waiver decision taken by the Chief Officer via the delegated powers report in consultation with the theme Committee Chairman.**

1. WHY THIS REPORT IS NEEDED

- 1.1 This report is pursuant to the requirement under article 12.2 of the Contract Procedure Rules which state that approved Officers may take decisions on emergency matters (i.e., an unexpected occurrence requiring immediate action) in consultation with the Chairman of Policy and Resources Committee providing they report to the next available Policy and Resources Committee, setting out the reasons for the emergency waiver.
- 1.2 The signed DPR enclosed under appendix one sought authority for a waiver under article 12 of the Contract Procedure Rules to extend the carers and young carers support services contract past the initial extension term by a further 6 months from 3rd October 2021 until 31st March 2022. This extension was requested on the basis that the Covid 19 pandemic delayed procurement of a new contract and would allow a full competitive procurement exercise to be undertaken. The new contract for carers and young carers support services will be in place following the procurement process being completed for 1st April 2022.

2. REASONS FOR RECOMMENDATIONS

- 2.1 As outlined in the Delegated Powers Report attached as an appendix.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 As outlined in the Delegated Powers Report attached as an appendix.

4. POST DECISION IMPLEMENTATION

- 4.1 As outlined in the Delegated Powers Report attached as an appendix.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 As outlined in the Delegated Powers Report attached as an appendix.

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

Sustainability)

5.2.1 As outlined in the Delegated Powers Report attached as an appendix.

5.3 Social Value

5.3.1 As outlined in the Delegated Powers Report attached as an appendix.

5.4 Legal and Constitutional References

5.4.1 Section 12.2 of the Contract Procedure Rules which states that approved Officers may take decisions on emergency matters (i.e., an unexpected occurrence requiring immediate action) in consultation with the Chairman of Policy and Resources Committee providing they report to the next available Policy and Resources Committee, setting out the reasons for the emergency waiver. A copy of the relevant Policy and Resources Committee report must be provided to CSG Procurement and stored on the Council's contract repository. Any waiver should only be granted for a maximum period of 12 months, except in exceptional case.

5.4.2 This report meets the requirements pursuant to Section 12.2 of the Contract Procedure Rules.

5.5 Risk Management

5.5.1 As outlined in the Delegated Powers Report attached as an appendix.

5.6 Equalities and Diversity

5.6.1 As outlined in the Delegated Powers Report attached as an appendix.

5.7 Corporate Parenting

5.7.1 None in the context of this report

5.8 Consultation and Engagement

5.8.1 As outlined in the Delegated Powers Report attached as an appendix.

5.9 Insight

5.9.1 N/A

6. BACKGROUND PAPERS

6.1 The Policy and Resources Committee agreed the Annual Procurement Forward Plan 2021-22 on 8th December 2020, which includes authorisation for Adults and Communities to procure carers and young carers support services (line 302: <https://barnet.moderngov.co.uk/documents/s62439/Appendix%201%20Annual%20Procurement%20Forward%20Plan%20202122.pdf>)

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	CHIEF OFFICER DELEGATED POWERS REPORT IN CONSULTATION WITH THEME COMMITTEE CHAIRMAN
Title	Waiver to extend the Barnet Carers and Young Carers Support Services contract by a further 6 months from 3 rd October 2021 until 31 st March 2022.
Report of	Executive Director, Adults and Health
Wards	All
Status	Public
Enclosures	None
Officer Contact Details	<p>Sameen Zafar, Health and Social Care Commissioner Sameen.Zafar@Barnet.gov.uk</p> <p>Sarah Perrin, Head of Commissioning for Mental Health & Dementia, Sarah.Perrin@Barnet.gov.uk</p>

Summary
<p>Carers and young carers support services deliver a range of preventative support to adult and young carers in Barnet. On 16th February 2016 the Policy and Resources Committee agreed to authorise the procurement of carers and young carers support services and the services were put out to tender on 22nd April 2016. Following a competitive procurement process, it was recommended that the contract was awarded to Barnet Carers Centre (BCC). The contract term was for three years from 3rd October 2016 to 2nd October 2019 with the option to extend for a further two years, subject to performance and finances</p>
<p>The contract is an integrated contract for both Adult Social Care and Family Services. The total contract value for the initial 3-year term of the contract was £1,171,999, with a total global contract value of up to £1,937,048 in the event the contract was extended by up to a further two years. In July 2019 a two-year extension with the provider was agreed and the current contract is due to end on 2nd October 2021.</p>
<p>This report seeks authorisation for a waiver to extend past the initial extension term by a further 6 months from 3rd October 2021 until 31st March 2022. This extension is requested on the basis that the Covid 19 pandemic delayed procurement of a new contract and will allow a full competitive procurement exercise to be undertaken. The new contract for carers and young carers support services will be in place following the procurement</p>

process being completed for 1st April 2022.

Decision

1. To authorise a waiver to extend the Barnet Carers and Young Carers Support Services contract by a further 6 months from 3rd October 2021 until 31st March 2022.

1. WHY THIS REPORT IS NEEDED

- 1.1 This report seeks authorisation to apply a waiver to further extend the Barnet Carers and Young Carers Support Services contract by a further 6 months. The current contract for Barnet Carers and Young Carers Support Services is due to end on 2nd October 2021.
- 1.2 Carers and young carers support services are a key component of the Council's early intervention and prevention offer and aims to support carers and young carers to maintain and maximise their health and wellbeing. The services delivered through this contract provide an integrated service offer across both Adult Social Care and Family Services.
- 1.3 The carers and young carers support services contract forms part of the Council's statutory duties under the Care Act 2014 including duties regarding; promoting wellbeing (see section 1 of the Care Act 2014), prevention (see Section 2 of the Care Act 2014), information and advice (see Section 4 of the Care Act 2014), transition to adult care and support (see Sections 58-66 of the Care Act 2014) and, the duty and power to meet a carer's need for support (see Section 20 of the Care Act 2014). This contract also forms part of the Council's statutory duties under the Children and Families Act 2014 regarding assessments for young carers.
- 1.4 The Annual Procurement Forward Plan 2021/22 includes authorisation for both Adult Social Care and Family Services to carry out a competitive procurement exercise for carers and young carers support services. However, following discussion with colleagues across Adults and Family Services it was recommended that the current contract in place was extended by a further 6 months beyond the current contract end date (2nd October 2021). This extension was recommended to ensure that there was sufficient time to complete a competitive procurement exercise. The tender for carers and young carers support services is currently out to the market and is due to close on 28th September 2021. The intention is that a new contract for carers and young carers support services will be in place from 1st April 2022.
- 1.5 The granting of this waiver will amount to a global contract value of £1,846,180.
- 1.6 The Council seeks a waiver in accordance with Rule 12.2 of the Authority's Contract Procedure Rules (**CPRs**), which states that approved Officers may take decisions on emergency matters (i.e., an unexpected occurrence requiring immediate action) in consultation with the Chairman of Policy and Resources Committee providing they report to the next available Policy and Resources Committee, setting out the reasons for the emergency waiver. A copy of the relevant Policy and Resources Committee report must be provided to CSG Procurement and stored on the Council's contract repository. Any

waiver should only be granted for a maximum period of 12 months, except in exceptional case.

2. REASONS FOR RECOMMENDATIONS

- 2.1 The Council has statutory duties to ensure there is a high-quality carers and young carers support services. The services help the council to manage the demand of people needing care and support, whilst also ensuring that carers and young carers have access to a range of support to maintain and maximises their health and wellbeing.
- 2.2 The recommendation to authorise a waiver to extend the contract for a further six months is made on the basis that the extension period takes into account the impact of Covid 19 and provides additional time for a full competitive procurement exercise to be undertaken with time to support mobilisation of a new contract.
- 2.3 A full competitive procurement process is currently underway, and this extension ensures continuity of services, until the new contract is awarded and mobilised effectively for 1st April 2022.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 Commissioners considered completing a competitive procurement exercise for these services to ensure that a new contract would be in place by 3rd October 2021. However, this option was not recommended as it presented a high level of risk in view of the impact of Covid 19 and the current role that the provider of these services has played in response to the pandemic. This is particularly with regard to supporting with the local Covid 19 vaccination programme for carers. Additionally, due to the complexity of this contract, commissioners recommend an extension to the current contract term to support additional time for mobilisation of a new contract.

4. POST DECISION IMPLEMENTATION

- 4.1 If there is agreement to authorise a waiver to extend the current contract by a further 6 months, the Council, supported by HB Public Law will put into place a further contract extension with the current provider.
- 4.2 For the duration of the contract extension, the incumbent provider will be monitored by the Council to ensure that ongoing performance meets the requirements set out in the performance framework.
- 4.3 Alongside this, a competitive procurement is underway to ensure that a new contract is in place for this service from the end of the recommended contract extension.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 The Council's Corporate Plan strategic objectives are that the Council, working with local, regional, and national partners, will strive to ensure that Barnet is the place:

- Where people are helped to help themselves, recognising that prevention is better than cure
- Where responsibility is shared, fairly
- Where services are delivered efficiently to get value for money for the taxpayer.

5.1.2 Authorising a waiver to extend the current contract in place for carers and young carers support service will support the Council in meeting these objectives.

5.1.3 The contract with the provider will be robustly monitored and reviewed including their performance through key performance measures and outcome indicators.

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

5.2.1 Through applying a waiver to authorise a further extension to the contract by 6 months, the total contract value for 2021/2022 will be £355,091. This comprises £226,823 from the Adults budget and £128,268 from the Family Services budget and is within the existing budget envelope. The total global spend of the contract will be £1,846,180.

5.2.2 Regular financial monitoring forms part of the contract, as does working within the ethos of continuous service improvement. The provider will be required to evidence key performance indicators that will form part of performance monitoring.

5.2.3 Contract monitoring will continue to take place on a quarterly basis.

6. Social Value

6.1 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. Before commencing a procurement process, commissioners should think about whether the services they are going to buy, or the way they are going to buy them, could secure these benefits for their area or stakeholders. There is no definitive list of what those improvements could be. The Act is deliberately flexible, giving public bodies freedom to determine what best suits local needs, as well as providers the opportunity to innovate.

6.2 Social Value will be considered as part of the evaluation of bids received following a competitive procurement process.

7. Legal and Constitutional References

7.1 Given that the overall contract value plus extension is within the budget approved via the Annual Procurement Forward Plan, the appropriate authorisation document for this decision as set out in the CPRs is via a Full Delegated Powers Report as the value of the

original contract, subsequent extensions as well as the proposed 6-month extension totals to over £500,000. This is in accordance with CPR 11.3.

7.2 **CPR 11** (*Extensions and Variations*) applies where a contract is to be extended or varied.

7.2.1 All extension options under the current contract have been exhausted. Where this is the case, CPR 11.1 states that 'under Regulation 72 of the Public Contract Regulations 2015, certain amendments, extensions, or renewals of an existing Contract can be made without triggering a requirement for a new Procurement exercise, subject to financial limits. Regulation 72 (1)(b) allows for additional services to be provided by the original provider where it has become necessary but was not contemplated in the original contract, and where a change of provider would cause significant inconvenience or substantial duplication of costs for the contracting authority', as long as the value of the extension does not exceed 50% of the original contract value.

7.2.2 The current contract in place for carers and young carers support services expires on 2nd October 2021 and the Council will be unable to complete the full competitive procurement exercise underway and mobilise a new contract prior to the expiry date of the current contract. This would mean a gap in service provision for carers and young carers in Barnet and statutory duties not being fulfilled; and thus 'causing significant inconvenience'. The 6-month extension requested allows the Council adequate time to complete the competitive procurement exercise, whilst ensuring the service continues to be delivered. The original contract value is £1,937,048, and with the extension value being £186,545, the value of this extension is below 50%, and thus, justification is established under Regulation 72(1)(b).

7.2.3 CPR 11.4 has further requirements in addition to justifying the use of Regulation 72, these are addressed as followed:

- The initial contract was based on a CPRs compliant tender process.
- The value of the extension does not exceed the original authorisation threshold and would not in any case due to it being at the maximum threshold i.e., over £500,000.
- The extension has relevant budget allocation as it was included in the Annual Procurement Forward Plan.
- This extension option was not declared in the original OJEU contract notice nor in the original acceptance report. However, this is where the Council would seek to rely on CPR 12.2, due to the extension being an unexpected occurrence requiring immediate action, to waive this part of CPR 11.4.

7.3 Section 12.2 of the Contract Procedure Rules in the Council's Constitution, states that approved Officers may take decisions on emergency matters (i.e. an unexpected occurrence requiring immediate action) in consultation with the Chairman of Policy and Resources Committee providing they report to the next available Policy and Resources Committee, setting out the reasons for the emergency waiver. A copy of the relevant

Policy and Resources Committee report must be provided to CSG Procurement and stored on the Council's contract repository. Any waiver should only be granted for a maximum period of 12 months, except in exceptional case.

- 7.4 Subject to authorisation through this Delegate Powers Report, HB Public Law will enact the extension to the current contract.

8. Risk Management

- 8.1 Further extending the current contract in place is unlikely to raise public concern as it will ensure continuity in service provision. There would be a risk of significant levels of public concern were the services not to be continued.
- 8.2 A full competitive procurement process is underway and a new contract for carers and young carers support services will be in place effective from 1st April 2022. The current procurement allows sufficient time to ensure that key mobilisation activity can occur ahead of the new contract commencing.
- 8.3 There are no risks to the Council with regards to the Transfer of Undertakings (Protection of Employment) Regulations 20016 ('TUPE') for the extension period.
- 8.4 The carers and young carers contract provides high quality support to carers and young carers in the borough, and the terms of the contract set out the responsibilities to deliver a high-quality service.

9. Equality and Diversity

- 9.1 The core provisions of the Equality Act 2010 came into force on 1st October 2010 and the public sector equality duty (section 149 of the Act) came into force on 5th April 2011. Under section 149, the Council must have due regard to the need to eliminate discrimination, harassment and victimisation prohibited under the Act and to advance equality for opportunity and foster good relations between those with protected characteristics and those without.
- 9.2 The protected characteristics are age; disability; race; gender reassignment; pregnancy and maternity; religion or belief; sex; and sexual orientation. They also cover marriage and civil partnership regarding eliminating discrimination.
- 9.3 Any organisation providing public sector services is subject to scrutiny by the Council to ensure that delivery complies with the public sector equality duty.
- 9.4 The contract for carers and young carers support services includes explicit requirements fully covering the Council's duties under equality legislation and the specification requires that hard to reach groups are to be identified and have the opportunity to receive the service.
- 9.5 The carers and young carers support services contract will continue to target resources to those most in need and there will be contract monitoring to ensure that the service meets the needs of hard-to-reach groups. The provider will continue to be asked to provide statistical data and evidence that the service is accessible to all.

- 9.6 The service specification requires involvement and inclusion of the wider community in all areas of work. The success of engagement with the wider community and hard to reach groups will be monitored through the contract monitoring processes and the provider will be required to address any anomalies where potential under-representation can be rectified or when an action has unintended consequences.

10. Corporate Parenting

- 10.1 None in the context of this report.

11. Consultation and Engagement

- 11.1 Engagement activity with residents has been carried out to inform the development of the future service and remains a vital aspect of the service delivery.

12. Insight

- 12.1 N/A

13. BACKGROUND PAPERS

- 13.1 The Policy and Resources Committee agreed the Annual Procurement Forward Plan 2021-22 on 8th December 2020, which includes authorisation for Adults to procure carers and young carers support services (line 302:

<https://barnet.moderngov.co.uk/documents/s62439/Appendix%201%20Annual%20Procurement%20Forward%20Plan%20202122.pdf>

Chairman: **Cllr Thomas**

Has been consulted

Signed



Date 19/09/2021

Chief Officer: **Dawn Wakeling**

Decision maker having taken into account the views of the Chairman

Signed

D. Waleling

Date 17/09/2021

**London Borough of Barnet
Policy and Resources
Committee Work Programme**

December 2021 – March 2022

Contact: Faith Mwende – Faith.mwende@barnet.gov.uk

Title of Report	Overview of decision	Chief/Lead Officer(s)	Issue Type (Non key/Key/Urgent)
9 December 2021 [deadline for cleared reports Tuesday 30 November]			
Business Planning	To approve the Business Planning report prior to a period of public consultation	Director of Resources (Section 151 Officer)	Key
Q2 2021/22 Strategic Performance Report (to cover April to September)	This report also seeks Committee approval for a series of budget management decisions for	Q2 2021/22 Strategic Performance Report (to cover April to September)	Non-Key
Annual Procurement Forward Plan 2022-23	To approve the Annual Procurement Forward Plan	Director of Finance (Section 151 Officer and Chief Finance Officer) Director of Commercial and Customer Services	Key
North London Waste Plan	Adoption of the North London Waste Plan	Deputy Chief Executive	Key
Social Value Policy	Members to approve the adoption of the updated Social Value Policy for Procurement alongside the recommended Terms of Measurement	Director of Resources (Section 151 Officer) Assistant Director, Investments and Innovation	Key
Annual Equalities Report	To consider and approve the annual equalities report for approval	Director of Resources (Section 151 Officer) Director of Public Health	Non-key
Telecare – Request for a 1-year contract waiver	Requests Committee to approve a waiver of the Contract Procedure Rules for the extension of the contract with Argenti for the provision of the Telecare services from 1st April 2022 for the period of one year up to 31st March 2023.	Executive Director, Adults and Health	Key/Urgent

Title of Report	Overview of decision	Chief/Lead Officer(s)	Issue Type (Non key/Key/Urgent)
Community Benefit Assessment Tool policy update	To approve the updated Community Benefit Assessment Tool policy	Assistant Director – Estates, Acquisitions and Development	Key
Authorisation of Barnet's Closed Churchyard Management Plan	To approve the Closed Churchyard Management Plan for the London Borough of Barnet	Assistant Director – Estates, Acquisitions and Development	Key
9 February 2022 [deadline for cleared reports Monday 31 January]			
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
24 March 2022 [deadline for cleared reports 15 March]			
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)	
TBC			
Local Heritage Site Review	Approval the nomination for the Heritage List	Deputy Chief Executive	

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