

Table of Proposed Additional Modifications – February 2024

Policies

SCHEDULE OF PROPOSED ADDITIONAL MODIFICATIONS TO SUBMISSION DRAFT BARNET LOCAL PLAN

This schedule contains all proposed additional modifications to Barnet's Local Plan that was submitted for examination on November 26th 2021.

Modifications

Ref	Chapter / Policy Number /	Proposed Modification Strikethrough text = text proposed for removal compared to submission version <u>Underline text</u> = new text proposed for addition compared to submission version	Reason for Modification
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AM1	Chapter 1 – Introduction	<p>1.1.1 The Council is progressing <u>Barnet has a new Local Plan. The existing previous</u> Local Plan (comprising Core Strategy and Development Management Policies Development Plan Documents) was adopted in 2012. Appendix C sets out how these <u>2012 Local Plan policies are being</u> have been 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.</p> <p>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.</p> <p>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:</p> <p>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;</p> <p>Justified – an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence;</p>	Update
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		<p>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</p> <p>Consistent with national policy – enabling the delivery of sustainable development in accordance with the NPPF.</p> <p>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.</p>	
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AM2	Chapter 1 – Introduction Figure 2	<p data-bbox="600 199 1366 231">Figure 2 - Relationship of Local Plan to Council Strategies</p>  <p data-bbox="750 247 1332 758">The diagram illustrates the relationship between the Local Plan and various Council Strategies. The Local Plan is the central focus, represented by a dark blue hexagon. It is surrounded by several other strategies, each represented by a light blue hexagon. The strategies are: Health & Wellbeing, Housing Strategy, Corporate Plan, Growth Strategy, Children & Young People, Parks and Open Spaces, Transport Strategy, Arts & Culture, Other Strategies, Fit & Active Barnet, Homelessness & Rough Sleeping, and Playing Pitch. A diagonal line is drawn across the diagram from the bottom-left to the top-right.</p>	Update with inclusion of Sustainability Strategy
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AM3	Chapter 1 – Introduction	<p>1.4 Evidence Base</p> <p>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 <u>on the Council’s website at Appendix A</u>. Reference is also made here to data and information the Council has been collecting to support its response to COVID19.</p> <p>1.4.2 In addition, a combined Sustainability Appraisal (SA), <u>Habitats Regulations Assessment (HRA)</u>, 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.</p> <p>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, incorporating <u>the requirements of the SEA Regulations</u>, 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 <u>impacts are considered through the SA process and that the emerging policies and site proposals and that the policies and site proposals included within the Local Plan</u> promote sustainable development.</p> <p>1.5 Community Engagement and Duty to Co-operate</p> <p>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</p>	Updates and clarifications
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2017, through several rounds of public consultation up to participation in the examination in public in 2022 / 2023 ~~have helped to 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 Statements and ~~the~~ Initial Statements 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 the 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 was adopted in October 2021. ~~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.~~

AM4	Chapter 2 – Challenges and Opportunities Sections 2.1 to 2.8	<p><u>2.1 Response to COVID19 and Changes to the Use Classes Order</u></p> <p>2.1.1 <u>In May 2023 the World Health Organisation declared that COVID19 no longer presents a global health emergency. This does not disguise the shadow cast by COVID19 and that 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</u> Whilst primarily a health issue, the unprecedented responses the pandemic has necessitated means meant that it is also became 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.</p> <p>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 COVID19 particularly in terms of rising unemployment, worsening mental health and reduced physical activity. Existing health inequalities in Barnet have been became further heightened.</p> <p>2.1.3 Although local evidence on the long term impact of COVID19 is still emerging, particularly through the Council's COVID19 Recovery Programme, COVID19 exposed deep inequalities within communities across Barnet. The Local Plan helps to form the basis of a response to the pandemic. Effective implementation of the Plan will help make a difference by fighting inequalities, reducing poverty, being family friendly and helping our residents to live well. It reflects Council priorities: to support residents to improve their skills and get good jobs in the post-COVID economy; <u>to enable residents to access and enjoy more opportunities for active lives; to enable helps town centres to be for everyone and be places that have good business health and vitality;</u> and our delivers regeneration that benefits local communities and improves well-being areas to thrive; and creates an environment</p>	Updates with respect to COVID19 and clarifications
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~~where residents and in which businesses benefit from green opportunities, skills and employment can succeed and are supported by 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~~ for health and wellbeing ~~has been~~ was 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 one another ~~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~~ ensuring 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 needs to be considered in planning the future of the Borough.

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 suburbⁱ. An important part of the Borough's character, is that it is a family friendly place, ~~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.

2.3.4 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 such as 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.

2.4 Housing

2.4.1 The housing crisis in Barnet is felt most keenly by those who have no home at all, and the Council faces a great challenge to reduce the harms associated with this. ~~A significant challenge for the Local Plan will be to provide~~ Providing 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 remains a significant challenge. ~~The~~ A challenge that is not simply just a crisis of numbers and meeting targets. Although 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

		<p>changing demographic and economic make-up of Barnet. This Plan will <u>seeks</u> efficient use of previously developed land and Barnet's existing housing stock. It will <u>supports</u> opportunities for tenure diversity when it can bring development forward quicker. It and may also consider p<u>Precision</u> manufactured housing on long term regeneration sites <u>will also be considered</u> as an appropriate option in addressing Barnet's housing needs.</p> <p>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 with that supporting infrastructure being <u>is</u> 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.</p> <p>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.</p> <p>2.5 Economy and Town Centres</p>	
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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 as a whole. 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 wastewater 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. The Borough contains one Site of Special Scientific Interest (SSSI) – the Welsh Harp (Brent Reservoir) which, as the largest expanse of water in Barnet, provides an important recreational resource as well as a valuable wildlife habitat. Access to the Welsh Harp is being improved in response to growth in the west of Barnet. The Council supports 'Vision for the Harp' and will work in partnership to deliver proper protection for the Welsh Harp. Any increased access to

the Welsh Harp will be managed appropriately in partnership with the community's Vision for the Harp' and in consultation with Natural England to ensure its integrity as a SSSI is maintained.

2.6.2A In May 2022 the Council declared a Climate and Biodiversity Emergency. To make Barnet carbon neutral by 2050 the Council is progressing a Sustainability Strategy that sets out the actions to be taken ~~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.

2.7 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 2021 – 2025 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~~ 2022 – 2027 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 movement 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 trips than those made by car due to congestion. Map 1 shows existing levels of Public Transport Accessibility in the Borough.

2.8.3 On the basis of pre-COVID 19 data 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)ⁱⁱ, 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 vehicleⁱⁱⁱ. A challenge for the Local Plan is to reduce ~~increase the rate of change in terms of~~ car use, ~~which~~ This 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 are ~~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~~ for transport to 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

		<p>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.</p> <p>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 <u>on relating to</u> the highway network (strategic and non-strategic) and public transport (bus and rail).</p>	
AM5	<p>Chapter 4 – Growth and Spatial Strategy</p> <p>Section 4.2 Introduction</p>	<p>4.2 Introduction</p> <p>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.</p> <p>4.2.2 Good growth, especially that in response to the impact of COVID19, must be beneficial for existing and future Barnet residents, <u>and</u> 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.</p>	Update and clarification

AM6	<p>Chapter 4 – Growth & Spatial Strategy</p> <p>Brent Cross</p> <p>Sections 4.13 to 4.15</p>	<p>4.13 Brent Cross West (Thameslink)</p> <p>4.13.1 Working with public sector partners and Network Rail, the Council has delivered<u>is</u> 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 has <u>will</u> meant that the new station was completed <u>is delivered</u> much earlier than originally planned and will be opened and is operational <u>is</u> operational for the first development plots. And when completed (forecast for 2022) <u>Brent Cross West opened in 2023. With it will</u> accommodate up to eight trains per hour the with a journey time to Kings Cross St Pancras of <u>is</u> less than 15 minutes. The new station will also provides a much-needed 24-hour pedestrian link across the railway lines which will <u>opening</u> up access to neighbourhoods in LB Brent to the west.</p> <p>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.</p> <p>4.14 Sequence of Delivery within the Brent Cross Growth Area</p> <p>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.</p> <p>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 /</p>	Updates
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		<p>Cricklewood Lane junction were completed in 2020 with the improvement to Cricklewood Lane / A5 Edgware Road due to be completed in 2021.</p> <p>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 <u>a number of</u> development plots, <u>and items of infrastructure, including mixed use residential and retail development, student accommodation, a replacement primary school, a new public square and new neighbourhood park.</u> 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.</p>	
AM7	<p>Chapter 4 – Growth & Spatial Strategy</p> <p>Edgware</p> <p>Section 4.18</p>	<p>4.18 Edgware Growth Area</p> <p>4.18.4 Edgware is identified in the <u>London Plan town centres hierarchy as Barnet’s only Major Centre and is also highlighted in the Growth Strategy as one of Barnet’s main town centres,</u> 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.</p> <p>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 <u>are</u> attracted to out of town retail centres as they expand their offering.</p> <p>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 <u>are</u> is also a presence of leisure uses including a fitness gym.</p>	

AM8	Chapter 4 – Growth & Spatial Strategy Colindale Section 4.19	<p>4.19 Colindale Growth Area</p> <p>4.19.13 The <u>District</u> 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.</p>	Clarification
AM9	Chapter 4 – Growth & Spatial Strategy Barnet's District Town Centres Section 4.21	<p>4.21 Barnet's District Town Centres</p> <p>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 <u>was</u> amplified by the Covid19 <u>COVID19</u> pandemic.</p> <p>4.21.7 Barnet's <u>District</u> 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.</p>	Clarification

AM10	Chapter 4 – Growth & Spatial Strategy Existing and Major New Public Transport Infrastructure Section 4.22	<p>4.22 Existing and Major New Public Transport Infrastructure</p> <p>4.22.2 The longer-term impacts of Whilst post COVID19 are as yet unclear, but there is potential for more working from home. Nevertheless, proximity to public transport nodes is expected to remain is expected to remain a key support for growth as commuting and leisure trips are expected to return 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.</p>	Clarification
AM11	Chapter 4 – Growth & Spatial Strategy Existing Public Transport Nodes Section 4.24	<p>4.24 Existing Public Transport Nodes</p> <p>4.24.3 The Borough is also served by <u>seven</u> six Network Rail stations. Three <u>Four</u> of these are on the Midland Main Line in the west of Barnet. The introduction <u>opening</u> of the new Brent Cross West Station will be <u>represents</u> 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.</p>	Clarification
AM12	Chapter 4 – Growth & Spatial Strategy Redevelopment of Car Parks Section 4.27	<p>4.27 Redevelopment of Car Parks</p> <p>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 <u>Publicly</u> 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.</p>	Grammar

AM13	<p>Chapter 4 – Growth & Spatial Strategy</p> <p>Strategic Parks & Recreation</p> <p>Section 4.28</p>	<p>4.28 Strategic Parks and Recreation</p> <p>4.28.2B 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 <u>it</u> suffers from poor public transport. The adopted Copthall masterplan will deliver the following professional and amateur sports facilities: A new Leisure Ccentre 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; <u>and</u> 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.</p> <p>4.28.2C 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 Dollis Dells 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</p>	Grammar
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		<p>complement and improve accessibility to the existing woodland and conservation areas alongside ecological enhancements and new habitats to protect and improve local biodiversity.</p> <p>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.</p>	
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AM14	<p>Chapter 5 Housing</p> <p>Affordable Housing Section 5.4</p>	<p>5.4 Affordable Housing</p> <p>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:</p> <ul style="list-style-type: none"> • 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 <u>planning obligations / legal agreements</u> requirements. <p>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:</p> <ul style="list-style-type: none"> • Affordable housing for rent – for homes managed by a Registered Provider where the rent is set at up to 80 <u>per cent</u> % of market rent, inclusive of service charges, in accordance with the Government’s Policy Statement on Rents for Social 	Clarification
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		<p>Housing, and for Build to Rent affordable rental units that are to be maintained in perpetuity at affordable levels.</p> <ul style="list-style-type: none">• 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 <u>are set out in</u> Sections 2 and 3 of the Housing and Planning Act 2016. Implementation <u>remains</u> subject to secondary legislation.• Discounted market sales housing – sold at least <u>20 per cent %</u> 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. <p>5.4.6 In terms of meeting the objectively assessed need for affordable housing the SHMA states a need to provide as a minimum <u>23 per cent %</u> 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 <u>50 per cent %</u> affordable provision for residential proposals on public land, or where agreed with public sector landowners a target of <u>50 per cent %</u> affordable housing across a portfolio of sites where at least <u>35 per cent %</u> affordable housing is provided on each site</p>	
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AM15	<p>Chapter 5 Housing</p> <p>Residential Conversions and Redevelopment of Larger Homes</p> <p>Section 5.6</p>	<p>5.6 Residential Conversions and Redevelopment of Larger Homes</p> <p>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 buildings^{iv}. 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 <u>with good PTAL</u>; 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.</p>	Clarification
AM16	<p>Chapter 5 Housing</p> <p>Housing choice for older people</p> <p>Section 5.8</p>	<p>5.8 Housing choice for older people</p> <p>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 <u>and nursing services</u> for conditions such as dementia. and nursing services.</p>	Clarification

AM17	<p>Chapter 5 Housing</p> <p>Residential Care Homes</p> <p>Section 5.11</p>	<p>5.11 Residential Care Homes</p> <p>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% <u>per cent</u> 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.</p> <p>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 64-52 registered residential homes and 48-22 registered nursing homes. Together they provide capacity for over 3,000 <u>2,500 people</u>, 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.</p>	Update
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AM18	<p>Chapter 5 Housing</p> <p>Homes in Multiple Occupation</p> <p>Section 5.12</p>	<p>5.12 Houses in Multiple Occupation</p> <p>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 Licensing <u>Licensing</u> process, the Planning Enforcement Team will investigate the matter and take the appropriate action.</p>	Grammar
AM19	<p>Chapter 6 Character, Design & Heritage Accessibility & Inclusive Design Section 6.14</p>	<p>6.14.1 Inclusive design is fundamental to improving the quality of life for all Barnet's residents, 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.</p>	Grammar
AM20	<p>Chapter 6 Character, Design & Heritage</p> <p>Energy Efficiency and Historic Buildings Section 6.27.1</p>	<p>6.27.1 Whilst <u>The</u> 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. <u>However</u>, 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.</p>	Grammar

AM21	<p>Chapter 7 Town Centres</p> <p>Introduction Section 7.2</p>	<p>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.</p>	Grammar
AM22	<p>Chapter 7 Town Centres</p> <p>Town Centres Evidence Base</p> <p>Section 7.4</p>	<p>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. <u>Use Class A1</u> 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.</p> <p>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:</p> <ul style="list-style-type: none"> • There is scope for further improvement of Barnet's town centres in both quantitative and qualitative terms. <i>This remains a post COVID19 priority.</i> • All town centres could benefit from improvement to the leisure offer. <i>Improving the offer of town centres to their neighbourhoods and being accessible by walking and cycling is an increased priority.</i> • Colindale, The Hyde is a District Centre performing more like a Local Centre. <i>The immediate-impact of COVID19 on all town centres is being monitored.</i> 	Clarifications and update

		<ul style="list-style-type: none"> • Clustering of uses for gambling, betting, payday loan shops, hot food take-away bars have negative health implications for users. <i>This still remains an issue of concern in Barnet's town centres.</i> • Growing number of service sector units (e.g. hairdressers, nail bars), accounting for almost half of total retail unit provision in Local Centres. <i>The immediate impact of COVID19 on all town centres is being monitored.</i> • Opportunities to promote digital technologies in town centres to future-proof them against declining footfalls. <i>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.</i> • 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. <i>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.</i> • 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 <u>spend expenditure leakage</u> (57%) amongst cinema goers <u>going out of the Borough</u>. 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. 	
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		<ul style="list-style-type: none"> 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. <i>Further evidence is required on the revival of cinema following the COVID19 pandemic.</i> 	
AM23	<p>Chapter 7 Town Centres</p> <p>Vibrant Town Centres</p> <p>Section 7.6</p>	<p>7.6 Vibrant Town Centres</p> <p>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 <u>types</u> typology of workspace provision (see Policy ECY01).</p>	Grammar
AM24	<p>Chapter 7 Town Centres</p> <p>Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars</p> <p>Section 7.8</p>	<p>7.8 Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars</p> <p>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 <u>Betting</u> Betting 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.</p>	Correction

AM25	<p>Chapter 8</p> <p>Community Uses, Health and Wellbeing</p> <p>Introduction</p> <p>Section 8.2</p>	<p>8.2 Introduction</p> <p>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 <u>was</u> impacted by COVID-19 <u>and had</u> 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.</p>	Update
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AM26	<p>Chapter 8</p> <p>Community Uses, Health and Wellbeing</p> <p>Provision for Children and Young People</p> <p>Section 8.7</p>	<p>8.7 Provision for Children and Young People</p> <p>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:</p> <ul style="list-style-type: none"> • 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 <u>local authorities</u> and cross-border movement. 	Update
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AM27	<p>Chapter 8</p> <p>Community Uses, Health and Wellbeing</p> <p>Early Years</p> <p>Section 8.11</p>	<p>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 <u>2023-2027</u> 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.</p> <p>8.11.3 Barnet's Children and Young People's Plan 2019—2023 <u>2023-2027</u> 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.</p> <p>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.</p>	Grammar and Update
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AM38	<p>Chapter 8</p> <p>Community Uses, Health and Wellbeing</p> <p>Further and Higher Education</p> <p>Section 8.12</p>	<p>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 the <u>Economy Chapter 9</u>.</p>	Grammar and Clarification
AM29	<p>Chapter 8</p> <p>Community Uses, Health and Wellbeing</p> <p>Community Premises</p> <p>Section 8.14</p>	<p>8.14.1 A major challenge for the Local Plan is ensuring the <u>that</u> 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.</p>	Grammar

AM30	<p>Chapter 8</p> <p>Community Uses, Health and Wellbeing</p> <p>Promoting Health and Wellbeing Section 8.17</p>	<p>8.17 Promoting Health and Wellbeing</p> <p>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.</p>	Clarification and update
AM31	<p>Chapter 8</p> <p>Community Uses, Health and Wellbeing</p> <p>Access to Integrated Health and Care Services Section 8.18</p>	<p>8.18 Access to Integrated Health and Care Services</p> <p>8.18. 1 Predicted population growth coupled with housing growth locally will create additional demand on the existing health infrastructure. General Practitioners (<u>GPs</u>) 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 <u>local</u> health care models.</p>	Clarification
AM32	<p>Chapter 8</p> <p>Community Uses, Health and Wellbeing</p> <p>Healthy and Green Barnet</p>	<p>8.19 Healthy and Green Barnet</p> <p>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 <u>the</u> 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.</p>	Update

	Section 8.19		
AM33	Chapter 8 Community Uses, Health and Wellbeing Making Barnet a Safer Place Section 8.20	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 <u>to</u> create safer environments through well planned good growth is key to the 'place-shaping' agenda.	Grammar
AM34	Chapter 8 Community Uses, Health and Wellbeing Public Houses Section 8.21	8.21 Public Houses 8.21.1 Around <u>Over</u> 70 pubs have closed in Barnet since 2000. The COVID19 pandemic lockdown and social distancing measures have <u>has</u> had a significant impact on the hospitality sector with many pub businesses not surviving. However, COVID19 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 <u>The Council's</u> evidence on Public Houses (<u>Barnet Public Houses Review</u>) 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.	Update

AM35	<p>Chapter 9</p> <p>Economy</p> <p>National and London Plan Policy Context</p> <p>Section 9.1</p>	<p>9.1 National and London Plan Policy Context</p> <p><i>NPPF</i> <i>Section 6 Building a Strong and Competitive Economy specifically paras 80, 81 and 82.</i></p> <p><i>London Plan</i> <i>Policy SD10 Strategic and local regeneration</i> <i>Policy D13 Agent of Change</i> <i>Policy HC5 Supporting London’s culture and creative industries</i> <i>Policy HC6 Supporting the night-time economy</i> <i>Policy E1 Offices</i> <i>Policy E2 Providing suitable business space</i> <i>Policy E3 Affordable workspace</i> <i>Policy E4 Land for industry, logistics and services to support London’s economic function</i> <i>Policy E6 Locally significant industrial sites</i> <i>Policy E7 Intensification, co-location, and substitution</i> <i>Policy E8 Sector growth opportunities and clusters</i> <i>Policy E11 Skills and opportunities for all</i></p>	<p>Clarification and update</p>
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AM36	<p>Chapter 9</p> <p>Economy</p> <p>Introduction</p> <p>Section 9.2</p>	<p>9.2 Introduction</p> <p>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 <u>post</u> 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.</p>	Update
AM37	<p>Chapter 9</p> <p>Economy</p> <p>Local Economy Evidence Base</p> <p>Section 9.4</p>	<p>9.4 Local Economy Evidence Base</p> <p>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 <u>All</u> 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.</p>	Clarification

AM38	Chapter 9 Economy Employment Space Section 9.5	<p>9.5 Employment <u>Space</u></p> <p>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 <u>still</u> remains unclear if greater flexibility for commercial uses will strengthen <u>its</u> it's protection from conversion to residential.</p>	Clarification and grammar
AM39	Chapter 9 Economy Office Section 9.6	<p>9.6 Office <u>Space</u></p> <p>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 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. While the Office Guidelines provided in Annex 1 of the London Plan advises that the Council should only protect small office capacity <u>only</u> 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.</p> <p>9.6.3 The impact of greater flexibility on changing between commercial uses and changes in work practices as a consequence of COVID19 is 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.</p>	Clarification and grammar
AM40	Chapter 9 Economy		Clarification and grammar

	<p>Industrial Space</p> <p>Section 9.7</p>	<p>9.7 Industry <u>Industrial Space</u></p> <p>9.7.6 Co-location of residential uses in a LSIS can prove problematic for both the existing businesses and new residents in regard 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 the Council and placing pressure on businesses to close or relocate. For these reasons any applications for co-location in an a LSIS must be employment led^v 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.</p> <p>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 <u>is</u> expected as set out above in para 9.7.6.</p>	
AM41	<p>Chapter 10</p> <p>Environment and Climate Change</p> <p>Air and Noise Pollution</p>	<p>10.9 Air and Noise Pollution</p> <p>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 <u>are</u> 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</p>	Grammar

	Section 10.9	particles is PM2.5. 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 (PM2.5). 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 Strategy will be important material considerations in assessing proposals.	
AM42	Chapter 10 Environment and Climate Change Flood and Water Management Section 10.13	10.13 Flood and Water Management 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.	Grammar
AM43	Chapter 10 Environment and Climate Change Watercourses Section 10.15	10.15 Watercourses 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.	Clarification

AM44	<p>Chapter 10</p> <p>Environment and Climate Change</p> <p>Playing Pitches and Outdoor Sports</p> <p>Section 10.21</p>	<p>40.24 10.20 Playing Pitches and Outdoor Sports</p> <p>40.24.1 10.20.1 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.</p>	Change to numbering
AM45	<p>Chapter 10</p> <p>Environment and Climate Change</p> <p>Biodiversity</p> <p>Section 10.26</p>	<p>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, <u>badgers</u>, 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.</p>	Reinstate badgers as a protected species

AM46	<p>Chapter 11</p> <p>Transport and Communications</p> <p>National and London Plan Policy Context</p> <p>Section 11.1</p>	<p>11.1 National and London Plan Policy Context</p> <p>Specific National and London Plan Policies to be taken into account:</p> <p><i>NPPF</i></p> <p><i>Section 9 Promoting sustainable transport specifically paras 102, 103, 104, 105, 106, 107, 108, 109, 110, 111.</i></p> <p><i>Section 10 Supporting high quality communications specifically paras 112, 113, 115, 116.</i></p> <p><i>London Plan</i></p> <p><u><i>Good Growth Objective Policy GG3 Creating a healthy city</i></u></p> <p><i>Policy D13 Agent of change</i></p> <p><i>Policy SI6 Digital connectivity infrastructure</i></p> <p><i>Policy T1 Strategic approach to transport</i></p> <p><i>Policy T2 Healthy streets</i></p> <p><i>Policy T3 Transport capacity, connectivity, and safeguarding</i></p> <p><i>Policy T4 Assessing and mitigating transport impacts</i></p> <p><i>Policy T5 Cycling</i></p> <p><i>Policy T6 Car parking</i></p> <p><i>Policy T6.1 Residential parking</i></p> <p><i>Policy T6.2 Office parking</i></p> <p><i>Policy T6.3 Retail parking</i></p> <p><i>Policy T6.4 Hotel and leisure uses parking</i></p> <p><i>Policy T6.5 Non-residential disabled persons parking</i></p> <p><i>Policy T7 Deliveries, servicing and construction</i></p> <p><i>Policy T8 Aviation</i></p> <p><i>Policy T9 Funding transport infrastructure through planning</i></p> <p><u><i>Mayor of London's Sustainable Transport, Walking and Cycling LPG</i></u></p>	Clarification
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AM47	<p>Chapter 11</p> <p>Transport and Communications</p> <p>Introduction</p> <p>Section 11.2</p>	<p>11.2 Introduction</p> <p>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.</p> <p>11.2.3 Fewer journeys by <u>people on</u> public transport has <u>post COVID19</u> <u>have had</u> 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 <u>the an</u> 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 <u>allowing to ensure</u> the transport policies set out in the London and Barnet Plans <u>to be</u> are delivered.</p>	Update
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AM48	<p>Chapter 11</p> <p>Transport and Communications</p> <p>Barnet's <u>Existing</u> Public Transport Network</p> <p>Section 11.3</p>	<p>11.3 Barnet's <u>Existing</u> Public Transport Network</p> <p>Existing Network</p> <p>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 <u>Two</u> 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.</p> <p>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 <u>is</u> fully accessible.</p> <p>11.3.6 The improvement of orbital travel for Barnet is a focus of the Barnet Long Term Transport Strategy (BLTTS). The <u>BLTTS</u> 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.</p> <p>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.</p>	Clarification
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AM49	<p>Chapter 11</p> <p>Transport and Communications</p> <p>Walking and Cycling in Barnet</p> <p>Section 11.6</p>	<p>11.6 Walking and Cycling in Barnet</p> <p>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 <u>undertaking</u> exercise.</p>	Clarification
AM50	<p>Chapter 11</p> <p>Transport and Communications</p> <p>Promoting Active Travel and Improving Health</p> <p>Section 11.7</p>	<p>11.7 Promoting Active Travel and Improving Health</p> <p>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. † <u>The Council</u> 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 (including school streets) which will complement the STPs.</p>	Clarification

AM51	<p>Chapter 11</p> <p>Transport and Communications</p> <p>Investing in Infrastructure</p> <p>Section 11.9</p>	<p>11.9 Investing in Infrastructure</p> <p>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 <u>decreasing</u> the level of reliance of Barnet residents on private vehicles.</p>	Clarification
AM52	<p>Chapter 11</p> <p>Transport and Communications</p> <p>Digital Communication</p> <p>Section 11.13</p>	<p>11.13 Digital Communication</p> <p>11.13.4 Barnet <u>The Council</u> 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.</p>	Clarification

AM53	<p>Chapter 12 Delivering the Local Plan</p> <p>Working with partners</p> <p>Section 12.2</p>	<p>12.2 Working with partners</p> <p>12.2.2 Barnet's <u>Through a number of Statements of Common Ground it is shown</u> how the Council has been <u>is</u> working with neighbouring boroughs, the wider West London sub-region and other north London local authorities to ensure that Barnet's the adopted <u>Local Plan has taken</u> 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 <u>the Council has met</u> we meet the Duty to Cooperate.</p> <p>12.2.3 The Council will <u>continue to</u> ensure that a consistent approach is taken in relation to Growth Areas and town centres which adjoin or cross borough boundaries <u>with Barnet</u>.</p>	Clarification
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ii 2011 Census – Method of travel to work (local authorities England and Wales)

iii 2011 Census

iv Barnet Residential Conversions Study 2019

v An employment led development is one where the employment generating (as defined by ECU01) floorspace is greater in proportion to the other uses proposed on the site,